

Report of Director of Placemaking, Decarbonisation and Engagement

Subject: Caravan and Camping in the Pembrokeshire Coast National Park – Managing Impacts – Proposed Consultation

Purpose of Report

The purpose of this report is to seek approval to consult on whether to make a formal Article 4 Direction to exclude some permitted development rights for camping and caravanning in order to provide a planning framework that will allow the National Park Authority to promote regenerative tourism in a sustainable manner.

The positive benefits of camping are well documented with potential to provide opportunities to visit and explore the National Park and improving well-being and mental health. Leisure and tourism are also a crucial part of the Pembrokeshire economy. As the Authority and other organisations move towards a regenerative tourism strategy, it is important to ensure that visitors have a positive experience and a positive impact, delivering a net benefit to the natural environment, its communities and nature.

This paper and supporting documentation explains where the operation of permitted development rights¹ in relation to some camping and caravan sites are undermining the regenerative tourism strategy. The paper sets out the options considered by Officers and a preferred option which would:

- Provide an improved framework to help manage the current impacts of 28-day² temporary (pop-up) campsites by removing this permitted development right;
- Improve dialogue and collaboration with Exemption Organisations³ regarding the selection and operation of sites in compliance with National Park planning policies and other statutory undertaker requirements through the introduction of a voluntary code of conduct⁴.

This preferred approach has been developed with the benefit of engagement through workshops and meetings both internally and externally. It is considered that these proposals should be subject to public consultation and the responses reported back to Members before a formal decision is made on whether and how to progress. The consultation will also provide an opportunity for members of the public and

¹ Permitted Development Rights. You can perform certain types of work without needing to apply for planning permission. These are called "permitted development rights". They derive from a general planning permission granted not by the local authority but by Government.

² The General Permitted Development Order 1995 provides an exemption for the use of land for temporary 'pop-up' campsites for up to 28 days a year without the need for planning permission.

³ In terms of camping and caravanning in the UK, an exempted organisation is one that has the authority to run or approve sites—without the need for planning permission or a licence.

⁴ Including Habitat Regulation Assessment, Natural Resources Wales and Public Protection requirements.

stakeholders to comment on the current preferred option and/or propose other options for Member consideration.

Background

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

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

All of the above therefore lie outside the control of the National Park Authority via the planning system.

Prior to the pandemic, concerns were being expressed about the number of campsites operating in the National Park and their impact on local communities and the wider National Park. However, during the pandemic, because of restrictions on travel and the greater propensity for “staycations” numerous additional campsites began operating and many of those have continued to operate even though travel restrictions have lifted.

The current legal framework, including the 28-day exemption has resulted in some cases in significant landscape impacts, with pitches being placed and, in some cases, gaining certificates of lawful use in locations in which planning permission would normally be refused.

There is potential under the current legislation for significant individual and cumulative landscape impacts as well as other associated impacts on infrastructure and the environment such as unregulated foul water discharges adversely affecting watercourses. The current situation is also placing a significant burden on the Authority’s enforcement officers who are asked to assess whether camping and caravan sites are in breach of planning regulations.

Permitted Development Rights for camping and caravan sites

The exemptions allowed in the Town and Country Planning (General Permitted Development) Order 2015 (‘the GPDO’) ⁵ are founded on much earlier legislation that includes the Caravan Sites and Control of Development Act 1960⁶ and the Public Health Act 1936.⁷ Taken together, planning permission is not normally required in the following instances:

⁵ [The Town and Country Planning \(General Permitted Development\) Order 1995 \(legislation.gov.uk\)](#)

⁶ <https://www.legislation.gov.uk/ukpga/Eliz2/8-9/62> = [Caravan Sites and Control of Development Act 1960 \(legislation.gov.uk\)](#)

⁷ <https://www.legislation.gov.uk/ukpga/Geo5and1Edw8/26/49/contents> = [Public Health Act 1936 \(legislation.gov.uk\)](#)

	Description	Permitted development	Site License Required?	Duration/Number of units	Certificate of Exemption Renewal Period	Focus of this Report
1.	Caravan site within the curtilage of a dwellinghouse	Not if incidental to the enjoyment of the dwellinghouse.	No	Not specified.	N/A	x
2.	Use by a person travelling with a caravan for up to two nights	One caravan and used by the person bringing it onto the site for a maximum of 2 nights.	No	1 caravan 2 nights at a time No more than 28 days per calendar year (on land in same ownership).	N/A	✓
3.	Tent Sites	Temporary use of land for up to 28 days in any one calendar year	No	Up to 28 days in any calendar year	N/A	✓
4.	Land holdings of 5 acres or more	Up to 3 caravans for no more than 28 days per calendar year	No	3 caravans 28 days per calendar year	N/A	✓
5.	Sites supervised and occupied by exemption organisations (paragraph 4 exemption) ⁸	Up to 28 days per calendar year.	No	Units not specified. Up to 28 days	Shall specify the date on which it is to come into force and the period for which it is to continue in force, being a period not exceeding one year.	✓
6.	Sites approved by exemption organisations (paragraph 5 exemption)	Up to 5 caravans for up to 60 days (no more than 42 consecutive days)	No	5 caravans 60 days (no more than 42 consecutive days in a calendar year)		✓
7.	Sites approved by exemption organisations ⁹	Tents for up to 60 days (no more than 42 consecutive days)	No	Unspecified number of tents 60 days (no more than 42 consecutive days in a calendar year)		✓
8.	Meetings organised by exemption organisations (paragraph 6)	Caravans/tents for up to 5 days	No	Unspecified number of caravans/tents for up to 5 days per calendar year	Arrangements made by exempted organisation	x
9.	Agricultural and forestry workers	Seasonal worker.	No	During a particular season	N/A	x
10.	Building and engineering sites	If that use is for the accommodation of a person or persons employed in connection with the said operations.	No	For carrying out the engineering work	N/A	x
11.	Travelling Showman	the use of land as a caravan site by a travelling showman	No	For the purpose of his business and specified times over the winter	Certificate granted – time period not specified	x

The increasing focus of concern for the National Park Authority is with exemptions available under rows 2 to 7 i.e 28-day sites known as pop-up sites and certificated sites for Exemption Organisations.

28 day sites

⁸ touring caravan exemption certificates (applications under paragraph 12 of Schedule 1 of The Caravan Sites and Control of Development Act 1960)

⁹ camping exemption certificates (applications under section 269(6) of The Public Health Act 1936 - applies to England and Wales, not Scotland)

Under the current legislation the so called '28 day rule' allows a landowner to use land without having to get formal planning permission for 28 days in a calendar year (see table row 3) for a campsite with no caravans.

Blocks of land of over 5 acres can be used for up to 3 caravans, or motorhomes or campervans for no more than 2 nights (see table row 4). Blocks of any size can be used for the siting of one caravan for no more than two nights (see table row 2).

The 28 days do not have to be consecutive. Sites set up under the 28-day rule are not subject to any form of scrutiny. Whereas landowners establishing sites in England are required to notify the planning authority in advance of opening, this is not required in Wales. No structures other than the most basic, temporary facilities such as a standpipe and portaloos are permitted without planning permission. The temporary nature of the sites is clearly to allow landowners to operate for a short period of time. There are no controls or licencing arrangements for temporary 'pop up' campsites – which makes them much easier to set up without any form of supervision or inspection. Many are low quality as a result.

Exemption Sites^{10,11}: With reference to rows 5 to 8 above a camping or caravan site licence and planning permission to use an area as a campsite is normally required. However, an exemption organisation can apply for an exemption certificate from Welsh Government if the organisation promotes leisure and recreation.

There are 3 types of exemption certificate for caravan organisations:

- Paragraph 4 Sites supervised and occupied by exemption organisations for up to 28 days per calendar year;
- 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 – this allows for use for a maximum of 60 days in one calendar year with a maximum of 42 of those days being for consecutive use;
- 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.

Both certificates are required if both tents and caravans are being used on the site at the same time.

Guidance produced by the Welsh Government suggests that organisations may wish to seek the views of the local planning authority prior to a site being used and that they should be sensitive to the concerns of local residents. No other consultation with

¹⁰https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/336772/com-bined-guidance_tcm6-9572.pdf

¹¹ <https://www.gov.uk/guidance/camping-and-caravanning-site-exemption-certificates-know-the-rules-and-how-to-apply>

infrastructure providers, licensing bodies or the general public is required. The National Park Authority is consulted by exemption organisations on applications for new sites in some but not all cases. In these cases, the Authority can submit representations and whilst these are sometimes considered, there is no obligation on the exemption organisation to do so.

Exemption organisations do apply their own guidelines and rules and exercise a degree of control over how their licenced sites are run and how rallies are organised. Sites are routinely inspected by the exemption organisations to ensure that the sites are operating within their prescribed guidelines and rules.

Certificates are issued annually by the Welsh Government for exempted sites. The Welsh Government do have the power not to re-issue a certificate providing a system of overall regulation in relation to exemption sites, albeit it is rare for them not to re-issue.

The public health/licensing teams within Pembrokeshire County Council also have a role to play, as they have responsibility and powers for ensuring licensing requirements are adhered to, although enforcement action is rare and tends to be reactive rather than proactive for reasons of resource availability and efficiency.

Issues arising in relation to 28-day sites and Exemption Sites

Appendix A is a Background Paper for consultation which provides details of issues arising from sites that are not regulated by the National Park Authority, i.e., where they are not subject to planning controls and other controls and self-checks (where they are in place) result in varying degrees of acceptability.

Appendix B Part 2 the Stage 1 Integrated Assessment which accompanies this report sets out in table format (page 33) the Pros and Cons of Permitted Development in the National Park which has been informed by the exploratory workshops and meetings.

In summary, camping can be beneficial, with the potential to improve well-being, mental health, a sense of community and more. Camping can provide life-enhancing and accessible experiences and provides a unique gateway to the great outdoors. Benefits to the local economy are also highlighted. However, issues arise including adverse landscape impacts (including cumulative impacts); accessibility, safety and wildlife impacts; difficulties with water connection, water provision on permitted sites; water quality issues; and difficulties with monitoring and enforcement. There is also a lack of public consultation associated with sites operating under 28 day rule and no formal requirement for public consultation for exempted sites.

Directions restricting permitted development

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.

Article 4(1) Directions are normally made when the character of an area of acknowledged importance would be threatened. They are most common in

Conservation Areas. The National Park Authority has historically put in place of Article 4(2) Directions for some Conservation Areas in the National Park.

The confirmation of an Article 4(1) Direction does not prevent planning permission being issued but instead 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 – it also allows for consultation with the general public and key regulators. It means that if necessary inappropriate development may be resisted.

Options for the Pembrokeshire Coast National Park Authority

In preparing this report a range of options were considered through workshops and meetings listed below.

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

Information from the workshops has been included in the issues identified within Appendix A Background Paper.

Appendix C to this report sets out the overall conclusions reached from the pre-consultation engagement undertaken on the following questions.

- Would you support some additional restrictions beyond those in place at present?
- Would you support a wholesale introduction – i.e., for the whole National Park or trial area?
- Would you support a 28-day rule Article 4(1) Direction?
- Would you support Article 4(1) on exempted organisations as well?

The responses received alongside information already gathered would suggest that the preferred way forward for the Authority could be to:

(A) introduce a non-immediate Article 4(1) Direction under the Town & Country Planning (General Permitted Development) Order 1995 (as amended in 2022) in

relation to the making of an Article 4 Direction to restrict camping sites from using the 28-day permitted development rule.¹²

(B) To publish an advice note, a draft of which is set out in Appendix D ‘How will Proposals be considered?’ to assist applicants applying for planning permission for temporary camping uses for which permitted development rights are removed by the Article 4(1) Direction.

(C) initiate biannual meetings with Exempted Organisations and other relevant parties to agree a voluntary Code of Conduct/ Working Protocol and to ensure there is an ongoing dialogue regarding the setting up and operation of exemption certificated sites in accordance with local and national policies and regulations.

However, before a formal decision is made by the Authority on an appropriate way forward it is proposed that a public consultation be carried out to allow feedback on the above preferred approach but also providing an opportunity to receive comments and ideas on alternative options. For Members information Appendix E includes a draft questionnaire that will be used for consultation.

Next Steps

The consultation will be co-ordinated by the Authority’s Strategic Policy Team and will include:

- Public notices in Pembrokeshire Herald and the Western Telegraph prior to the start of the consultation
- A press release
- An amendment to the relevant section of the National Park Authority’s website to refer to the consultation
- Notification of contacts on the Local Development Plan mailing list, planning agents and those who have already been contacted through meetings and workshops.
- A specific online drop in workshop for Town and Community councils
- A general drop in workshop for any interested parties
- Engagement via Visit Pembrokeshire networks

A proposed timetable for reporting back to Members is set out below. Steps below are dependent on feedback and NPA decision on the 23 October 2024. If the NPA agrees to progress an Article 4 Direction, then the following steps would need to be taken.:

Public Consultation on Preferred Option	June/July/August/mid Sept 2024
Report of consultations to NPA and decision as to whether or not to make a non-immediate effect Article 4 (1) Direction (taking effect 1 year from the date of the Authority meeting)	23 October 2024 NPA meeting
Notice of Direction given with a period for formal representation	3 months representation period

¹² <https://www.legislation.gov.uk/wsi/2022/997/made>

Report on formal representations to National Park Authority with a recommendation on whether to confirm or not. Members decide whether to confirm. If confirmed notice of confirmation must be given along with the date the Direction takes effect.	January/February 2025
Article 4 (1) Direction to take effect	23 October 2025

Financial considerations

The Authority has sufficient budget to carry out the consultation procedures. If an Article 4 (1) Direction was introduced then 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.

Risk considerations

Financial: The costs of implementation have been accounted for see above.

Legal: The Authority’s legal advisers are checking the procedures as the Authority progresses.

Political: Local Members (some serving on the National Park Authority) are likely to be contacted regarding the proposals. Officers intend to prepare some ‘Frequently Asked Questions’ to share with Members.

The full details of the consultation papers will also be provided. Members are also contacted regarding complaints about how sites are operating.

Public perception: In terms of public perception the Authority has carefully considered how to inform interested parties regarding the proposed consultation and what key outcomes are intended.

The use of a public consultation with background information provided in advance of making a formal decision on the way forward means that:

- Those consulted have an opportunity to influence decision making at a formative stage. The key message is that a final decision on whether to make an Article 4(1) Direction has not been made yet.

- Consultees can make an informed judgement based on the information provided. Feedback will provide Members with an opportunity to consider extensive views before coming to a final decision on whether to make an Article 4(1) Direction.
- Consultees will be given over three months to comment on the proposals which provides adequate time for consideration and response.
- Consultees will be given an opportunity to suggest alternative approaches to the Authority's preferred approach.

Currently the preferred option would be to consult on an Article 4(1) Direction without immediate effect. This would mean that if confirmed the requirement for planning permission would be delayed for example by 1 year. The timescale proposed for making and confirming an Article 4(1) Direction would allow individual landowners to explore moving from a 28-day permitted development site to one where the planning permission is required in sufficient time for the next visitor season.

Risk of not doing something: As set out in the attached Background Paper (Appendix A) and from feedback from workshops and meetings there are real dangers of undermining the strategy of the Local Development Plan and undermining the Authority's role as a National Park Authority by not acting on issues arising from unregulated caravan and camping sites. Landscape impacts, impacts on water quality, highway safety and a lack of opportunity for public consultation on proposals which impact on local communities are all significant issues. It is important however that wider public views are obtained before the National Park Authority makes a decision on how to progress.

Compliance

As set out in Appendix B Part 1 Stage 1 Integrated Assessment page 4; with the implementation of the preferred approach; under 'positive outcomes' the intention is to have a more comprehensive control in 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.

Human Rights/Equality issues

The planning system seeks to progress legitimate aims by managing the development and use of land in the public interest to contribute to achieving sustainable development. It reconciles the needs of development and conservation, securing economy, efficiency, and amenity in the use of land, and protecting natural resources and the historic environment. Human rights under Articles 1 (right to peaceful enjoyment to property), 8 (right to respect for the home, private and family life) and 14 (right to equality), are the most relevant ones. Proportionality means that the measure which interferes with the right must strike a fair balance between the aim and the right which it

interferes with.

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

The attached Stage 1 Integrated Assessment (Appendix B Part 1) provides a detailed appraisal of protected characteristics and issues of equality. In summary the potential impact of the preferred approach is positive.

If an Article 4(1) Direction is in due course confirmed then in relation to submitting a 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(1) Direction would:

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

The preferred approach, along with the opportunity to submit alternative options will be consulted upon and issues arising can be considered by the National Park Authority prior to any final decision being made.

Biodiversity implications/Sustainability appraisal

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

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

The framework of the Local Development Plan 2 would be used to assess proposals. The appraisal covers biodiversity, air, land, water quality, access to open space, built

heritage, CO2 emissions and sequestration etc. In summary, the proposals are likely to have a significant positive effect on the Authority's biodiversity duty and would support its decarbonisation agenda.

Welsh Language considerations

Welsh language considerations are also covered in Appendix B Part 1 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).

This consultation will be carried out in accordance with Welsh Language Standards.

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.

Recommendations:

Members are asked to approve:

- 1. A public consultation on:**
 - a) The potential introduction of an Article 4 (1) Direction removing permitted development rights for 28-day rule sites as set out in the Background Paper Appendix A.**
 - b) The potential introduction of a Code of Conduct / Working Protocol for Exempted Organisations as set out in the Background Paper Appendix A.**
- 2. The Stage 1 Integrated Impact Assessment in Appendix B Part 1 and Part 2 to be published simultaneously for information.**
- 3. A FAQs document, questionnaire and draft guidance note on how applications for a 28-day site would be assessed through the planning system to be published simultaneously for information.**

Background Documents

Pembrokeshire Coast National Park Local Development Plan 2 September 2020
<https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/>

Caravan and Camping Supplementary Planning Guidance

<https://www.pembrokeshirecoast.wales/wp-content/uploads/2021/07/Camping-SPG-Post-Cons-Eng.pdf>

(For further information, please contact Sara Morris Director of Placemaking, Decarbonisation and Engagement and Emma Gladstone Strategic Policy Manager)

Author: M and S Planning

Consulted/engaged with (internal and/or external stakeholders): Sara Morris, Emma Gladstone, Charles Felgate on report. Significant external engagement summarised in table within report.

Background Paper

Camping and Caravanning in Pembrokeshire Coast National Park –
Managing Impacts

May 2024

Pembrokeshire Coast National Park Authority

Contents

1.0	Introduction.....	3
2.0	The National Park.....	3
3.0	Planning Policy on Camping and Caravans	4
4.0	The Current Situation	4
	Table 1: Camping Sites granted Planning Permission/Certificate of Lawfulness between 2015 and 2023	6
5.0	Scrutiny and Control with Planning Applications	7
6.0	Permitted Development – Planning Permission not needed.....	8
	Table 2 Issues experienced	10
7.0	Actions Taken to Date.....	12
	Table 3: Actions to date to try to control unauthorised development.....	12
8.0	Options for Change	14
	Table 4: Options.....	16
9.0	Summary and Conclusions	16
	Table 5: Issues.....	17
	Table 6: Options.....	19
	Annexe 1: Landscape Character Areas – Summary of Capacity for Additional Camping, Caravan and Chalet Development.....	20
	Annexe 2: Policy 41 of the Adopted Local Development Plan.....	22
	Annexe 3: Pros and Cons of Camping and Caravan Sites established through permitted development rights	25

1.0 Introduction

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

2.0 The National Park

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

3.0 Planning Policy on Camping and Caravans

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

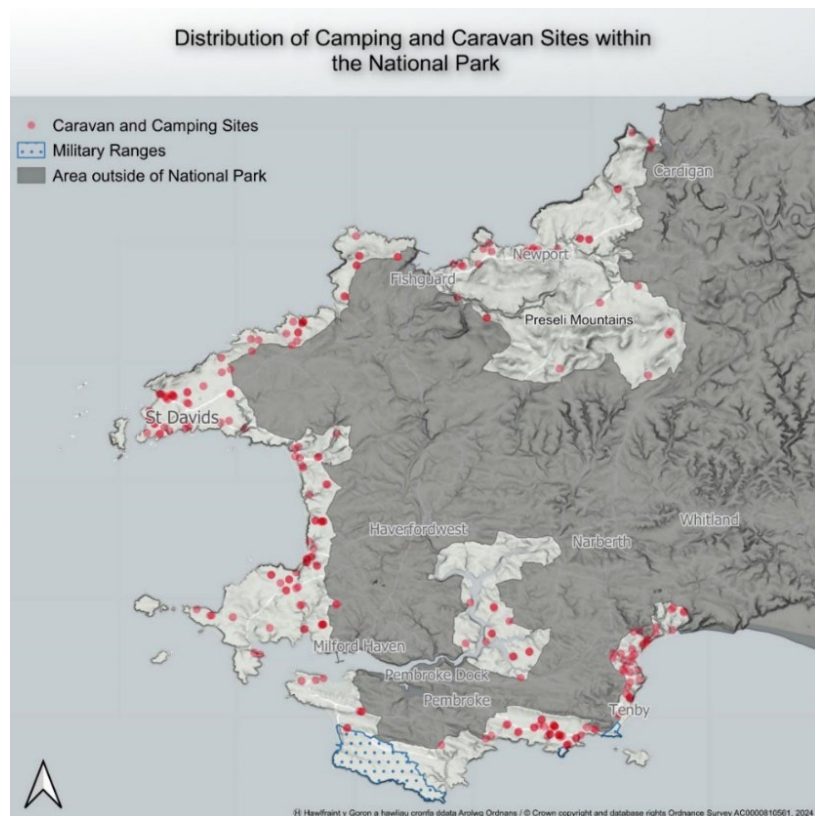
4.0 The Current Situation

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

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

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

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



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

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

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

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

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

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

5.0 Scrutiny and Control with Planning Applications

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

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

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

6.0 Permitted Development – Planning Permission not needed

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

6.2 Exemption Certificate Sites

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

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

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

6.4 There are 3 types of exemptions for caravan organisations:

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

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

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

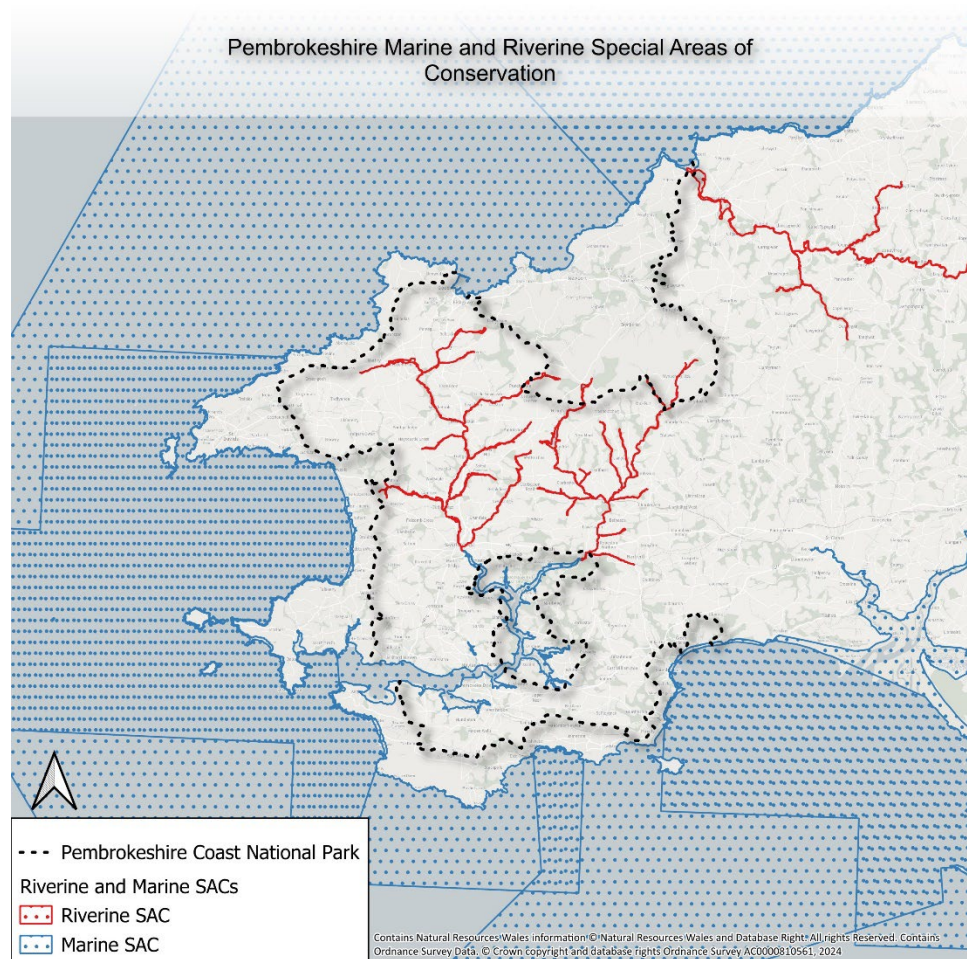
6.12 Sites set up through permitted development rights are not subject to the same scrutiny or public consultation as those requiring planning permission. Over the last few decades, laws and regulations to protect the natural environment have increased but permitted development sites are operating for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

Table 2 Issues experienced

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

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

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



7.0 Actions Taken to Date

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

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

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

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

³ [28 Day Guide](#)

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

8.0 Options for Change

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

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

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

8.4 **Experience from Elsewhere**

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

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

Table 4: Options

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

9.0 Summary and Conclusions

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

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

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

Table 5: Issues

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

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

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

Table 6: Preferred Options shown in bold⁴

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

⁴ Repeat of Table 4, above

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

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

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

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

Extract from adopted Supplementary Planning Guidance – Caravans and Camping

Annexe 2: Policy 41 of the Adopted Local Development Plan

Policy 41 Caravan, Camping and Chalet Development

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

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

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

Proposals coming forward as set out above must ensure that:

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

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

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

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

Table 7 Definition of Different Types of Development

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

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

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

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

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

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

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

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

Caravan and Camping in the National Park – Permitted Development ⁵ - Pros and Cons

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

Individual sites will exhibit these pros and cons to varying degrees												
Economic												
Income generation and spend in the locality ⁸	Employment generator	Temporary land take. Marginal land used. Exempted sites tend to be small scale. ⁹	Farmers can diversify.	Able to act now.			‘Uneven playing pitch’ for competitors	Agricultural land quality may be affected	Land temporarily withdrawn from agricultural use			
Visitor												
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.			Access to the National Park may not be in the ‘right place’.	Some hotspots – over visited	Amenity of neighbours. Noise Light. Unsocial hours	Potential for conflict with other visitors and communities	Visitor safety a concern ¹⁰	Sometimes visitor conflict is on the same site

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

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

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

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

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

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

Pros 6	A	B	C	D	E	Cons 7	A	B	C	D	E	F
					attract groups or can easily control those booking							
	Environment											
	Access to the National Park increased.	Connect to nature opportunity ¹¹	Connect with landscape opportunity	Connect to historic environment opportunity	Set aside opportunity. ¹²		Soil impaction/ erosion possible	Water Quality may be affected - Phosphates	Flood Zones may be impacted and site equipment damage from flood events	Landscape impacts. Special Qualities ¹³ Night sky.	Ecology ¹⁴ may be affected	Archaeology may be affected
								Water connection ¹⁵		Cumulative Impacts of camp sites in one location		
								Sewerage capacity Sewage disposal is a potential issue ¹⁶				

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

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

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

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

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

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

Pros 6	A	B	C	D	E	Cons 7	A	B	C	D	E	F
								Water supply ¹⁷				
								Water contamination ¹⁸				
	Traffic											
							May lead to congestion.	Vehicles unsuitable for minor roads	Opportunity to locate in more accessible locations potentially lost.	More likely to be reliant on the private car in remote locations.		

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

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

PCNPA Integrated Assessment Template

Title of what is being Assessed: Article 4 Direction 28-day Permitted Development

Is this a staged Integrated Assessment: Yes, the Stage 1 Integrated Assessment will be reviewed following the public consultation period.

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

Name of Strategic Plan, Policy or Decision being assessed	<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"> 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. 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 portaloos are permitted without planning permission.
Department/ Service Area	Planning
Officer Responsible for Impact Assessment	Name: Martina Dunne M & S Town Planning Ltd on behalf of Sara Morris (Stage 1 pre consultation)
Responsible Senior Manager	Name: Sara Morris Title: Director of Placemaking, Decarbonisation and Engagement
Timetable for the Assessment	Stage 1 Assessment to accompany the National Park Authority Committee papers NPA 1st May, (deadline 15th April). The Stage 1 Assessment will form part of a 3-month public consultation and will be updated to reflect representations received before the National Park Authority Committee consider progressing an Article 4 (1) Direction in the Autumn 2024. The draft proposal is to introduce a non-immediate Article 4 (1) Direction for 28-day caravan and camping sites.

Monitoring and Review of Assessment	See above under Timetable for the Assessment.
STAGE 1 (PRE PUBLIC CONSULTATION): Chief Executive Sign Off – Completed Assessment and Summary/ Recommendations	Sign off date:

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

What is its proposed purpose?
<p>To introduce a non-immediate effect Article 4 (1) Direction for the whole of the Pembrokeshire Coast National Park. The National Park Authority’s intention if taken forward following consultation would be to 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"> (a) Tents and trailer tents to be used for no more than 28 days in a calendar year. (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. (c) No more than one caravan 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. <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> <p>Explanatory Note of Permitted Development Rights under The Town and Country Planning (General Permitted Development) Order 1995: Part 5 A Permitted Development:</p>

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.

Is it new or existing and under review?

It would be new if taken forward.

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

See above under 'What is its proposed purpose?'

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.

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 – **Appendix D** to the Committee's Covering Report. The intention if the Authority progresses beyond consultation stage is to pursue an Article 4(1) Direction without immediate effect. This would provide sufficient time to seek planning permission by delaying introduction of the Article 4 Direction.

Detail the budget implications relating to it?

Budgetary provision is made for the consultation associated with an Article 4 (1) consultation within existing budgets. If an Article 4 (1) Direction was introduced then 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 positive.</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>	<p>Noted that potential impact is positive in terms of approach to introduction. Will re consider potential impacts following consultation period</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>This means that the process of introducing an Article 4 Direction would:</p> <ul style="list-style-type: none"> ➤ 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. ➤ Require consulting and seeking the opinion of those who are affected. ➤ ensure there is better control of unregulated caravan and camping sites thus ensuring that: <ul style="list-style-type: none"> ○ 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.¹ <p>It is also intended that the Authority would implement the Article 4 Direction across the Local Planning Authority area meaning that the implementation would be the same in every area.²</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 Assessment³ which screened all policies against 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>and representations received.</p>
--	--	--------------------------------------

¹ Workshop with Stakeholders 8th February 2024 and Pros and Cons table attached to this assessment.

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

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

	<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>	
Disability	<p>See previous for Age</p> <p>Pembrokeshire Council Licence Conditions for a Tent Site/ holiday site for touring caravans include following requirement:</p> <ul style="list-style-type: none"> • Particular consideration shall be given to the needs of the disabled in the provision made for water points, toilets, washing points and showers. 	<p>Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.</p>
Gender Reassignment	<p>See previous for Age</p>	<p>Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation</p>

		period and representations received.																								
Pregnancy and Maternity	See previous for Age	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.																								
Race	<p>See previous for Age</p> <ul style="list-style-type: none"> Pembrokeshire has a higher % of people identifying as White: Gypsy or Irish Traveller at 0.5% (560) than Wales at 0.1%. <table border="1"> <thead> <tr> <th rowspan="2">Ethnic group (detailed)</th> <th colspan="2">lacu2021:Pembrokeshire</th> <th colspan="2">country:Wales</th> </tr> <tr> <th>number</th> <th>%</th> <th>number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Total: All usual residents</td> <td>123,363</td> <td>100.0</td> <td>3,107,496</td> <td>100.0</td> </tr> <tr> <td>White: Gypsy or Irish Traveller</td> <td>560</td> <td>0.5</td> <td>3,370</td> <td>0.1</td> </tr> <tr> <td>White: Roma</td> <td>34</td> <td>0.0</td> <td>1,843</td> <td>0.1</td> </tr> </tbody> </table> <p>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.</p>	Ethnic group (detailed)	lacu2021: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 positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.</p> <p>The proposed introduction of a non-immediate effect Article 4 Direction for the whole of the Pembrokeshire Coast National Park will not</p>
Ethnic group (detailed)	lacu2021: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																						

	<ul style="list-style-type: none"> Local Development Plan 2 has Policy 53 Gypsy, Traveller and Showpeople Sites: 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 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’ 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>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 positive in terms of approach to introduction (as per Age). Will re consider

		potential impacts following consultation period and representations received.
Sex	See previous for Age.	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.
Sexual Orientation	See previous for Age	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.
Marriage and Civil Partnership	See previous for Age.	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts

		following consultation period and representations received.
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"> ➤ 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. ➤ require seeking the opinion of those who are affected. <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 in every area.</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.</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>Feedback from Exploratory Workshops has provided an opportunity to develop the Table identifying pros and cons attached to this 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>Both positive and negative implications are identified. 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.</p> <p>No application fees 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 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 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>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"> - A guidance note - See Appendix D to the Committee's covering report. - A no fee requirement for what are 28-day site proposals - A lead in time for introducing the Article 4
--	--	---

		<p>Direction to allow applicants an adjustment time to get their planning permissions in place (e.g.12 months)</p> <p>Will re consider potential impacts following consultation period and representations received.</p>
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.
Health and Well-being Outcomes and Inequalities	<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.</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>	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

	<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 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>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 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</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>applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated</p>
--	--	--

Public Sector Equality Duty Considerations

<p>How does the Strategic Plan, Policy or Decision being assessed promote equality of opportunity?</p>	<p>It would allow people the opportunity to influence what is happening in their community – see Group focused impact assessment above. 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 on the proposals and on individual planning applications would ensure representations are considered promoting good relations. The proposal should enable well planned campsites in accessible locations, avoiding those that cause amenity concerns for neighbours. The Authority can be proactive through both the biannual meetings and through pre-application advice etc. The refusal of a planning permission or misinterpreting the proposal as a complete stop to caravan and camping could cause bad feeling.</p>

Does this Strategic Plan, Policy or Decision have the potential to cause unlawful direct or indirect discrimination?	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.
Does this Strategic Plan, Policy or Decision have the potential to exclude certain group of people from obtaining services, or limit their participation in any aspect of public life?	Consultation on the proposals and on individual planning applications would ensure representations are considered promoting inclusivity. Currently 28-day site proposals do not require public engagement.
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</p> <p>If yes, what steps will you put in place:</p> <ul style="list-style-type: none"> - Requiring Exploratory Workshops as part of the commission - Requiring the preparation of an Integrated Impact Assessment of the proposal - Ensuring that formal consultation complies with the National Park Authority's Local Development Plan Delivery Agreement for engaging with the public. - Requiring papers to be prepared for workshops, Committee meetings including the preparation of reports of consultations on feedback from consultations carried out.

Data/ Engagement Gaps

Do you have any data/ engagement gaps?	A Background Paper has been prepared to accompany the formal consultation – Appendix A to the Committee Report. This document will form part of the consultation and comment invited on the data. The wider public consultation should assist with providing an informed view of the proposals.
--	---

	<p>These responses will be considered before the National Park Authority make a final decision on progressing the Article 4 Direction.</p> <p>Potential impacts will be re considered following the consultation.</p>
<p>If yes, can further information be obtained or additional engagement to fill any of these data gaps?</p>	<p>See previous answer.</p>

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

<p>Equality Summary/ Recommendation from Assessment:</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"> ➤ 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: <ul style="list-style-type: none"> • 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.⁴
--

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

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

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
Use of Welsh Language	<p>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).</p> <p>The proposal 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 during preparation and approval process.</p> <p>Positive that proposal would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas.</p> <p>Will re consider potential impacts following consultation period and representations received.</p>
Number of Welsh Speakers	See above.	See above.
Fluency and Confidence of Welsh speakers	See above.	See above.

and learners to use Welsh		
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 will form part of the consultation and comment invited on the data. The wider public consultation should assist with providing an informed view of the proposals.</p> <p>These responses will be considered before the National Park Authority make a final decision on confirmation of the Article 4 Direction.</p> <p>Potential impacts will be re considered following the consultation.</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).

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>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>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.</p>	This is a positive outcome.

	<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.</p> <p>Both positive and negative implications are identified. 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.</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"> ➤ Number and type of sanitation facilities. ➤ Disposal of refuse ➤ Water supply and wastewater disposal ➤ Appropriate locations for chemical toilet disposal <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.</p>	<p>This is a balanced outcome ensuring that access is managed to avoid harm to the National Park.</p>

	<p>The table in the 'Environment' Row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park.</p> <p>Both positive and negative implications are identified.</p> <p>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.</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>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>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. 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>
<p>CO2e Emissions or Mitigations</p>	<p>Stakeholders were provided an opportunity to comment at two exploratory workshops. When discussing the Pros and Cons table the table was</p>	<p>This is a positive outcome.</p>

	edited to include the need to locate sites in more accessible locations. By not progressing the Article 4 Direction the private car is more likely to be used.	
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"> ➤ Number and type of sanitation facilities. ➤ Disposal of refuse ➤ Water supply and wastewater disposal ➤ Appropriate locations for chemical toilet disposal ➤ Appropriate safety on site and appropriate licensing for any facilities on-site such as shops, restaurants, swimming pools, hot tubs etc. 	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 – Appendix A to the Committee Report. This document will form part of the consultation and comment invited on the data. The wider public consultation should assist with providing an informed view of the proposals.</p> <p>These responses will be considered before the National Park Authority make a final decision on progressing the Article 4 Direction.</p> <p>Potential impacts will be re considered following the consultation.</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

<p>Section 6 Biodiversity Duty and Decarbonisation Summary/ Recommendation from Assessment:</p> <p>In summary the proposals are likely to have a significant positive effect on the Authority’s biodiversity duty and would support its decarbonisation agenda.</p>

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 ⁵ 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 ⁶ 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.
A Healthier ⁷ Park/ Pembrokeshire / Wales	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. 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 more positive outcome is likely than is currently being experienced.

⁵ 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.

⁶ 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).

⁷ 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.

A More Equal ⁸ Park/ Pembrokeshire / Wales	<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"> <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. <input type="checkbox"/> mean the opinion of those who are affected would be sought. <input type="checkbox"/> mean that there is better control of unregulated caravan and camping sites thus ensuring that: <ul style="list-style-type: none"> • mean the amenity of neighbouring properties and local communities are more fully considered. • mean remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services. <p>See also commentary under a 'Prosperous Park' as well.</p>	A positive impact
A Park/ Pembrokeshire/ Wales of Cohesive ⁹ 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	Please see commentary under 'Welsh Language' above and under 'Built Environment, Heritage' under Section 6 'Biodiversity and Decarbonisation'.	Positive Impact.

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

⁹ Attractive, viable, safe, and well-connected communities.

Culture & Thriving Welsh Language ¹⁰		
A Globally Responsible ¹¹ 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 ¹²	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 ¹³	This is clearly identified through the first exploratory workshop undertaken and as shown in the Pros and Cons Table.	Positive outcome.
Integration ¹⁴	The proposed Article 4 Direction would nest within the Authority’s Local Development Plan’s Strategy for caravan and camping. The National Park Authority’s Corporate and Resources Plan 2023 to 2027 identifies priorities in relation to: <ul style="list-style-type: none"> - Boosting biodiversity and halting its decline - Destination Net Zero for the National Park 	The assessment has identified significant positive impacts in terms of biodiversity and. Contributions towards reducing carbon emissions, ensuring greater inclusivity in

¹⁰ 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.

¹¹ 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.

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

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

¹⁴ 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.

	<ul style="list-style-type: none"> - People being healthier and happier and more connected to nature and heritage. - People have a chance to live work and enjoy the National Park 	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).
Collaboration ¹⁵	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.	There has been collaboration.
Involvement ¹⁶	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 consultation on the proposal before a final decision is made regarding progressing.	Involvement continues.
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.

¹⁵ 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.

¹⁶ 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.

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

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

The proposals fit well within the Well-being Goals and the 5 Ways of Working. Horizon scanning will continue as the project progresses.

Section 4 – Follow up Actions – for inclusion in Integrated Assessment Log for Monitoring

Action	Responsible Officer	Timescales
Review this draft Integrated Assessment following the public consultation on the Proposals	Sara Morris Director or delegated Officer	August/September 2024
Welsh Language Standards to be complied with during preparation and approval process.	Sara Morris	

Please forward completed integrated assessments to mairt@pembrokeshirecoast.org.uk

Appendix B Part 2 Caravan and Camping in the National Park – Permitted Development ¹⁷- Pros and Cons

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

Pros ¹⁸	A	B	C	D	E	Cons ¹⁹	A	B	C	D	E	F
Economic												
	Income generation and spend in the locality ²⁰	Employment generator	Temporary land take. Marginal land used. Exempted sites tend to be small scale. ²¹	Farmers can diversify.	Able to act now.		'Uneven playing pitch' for competitors	Agricultural land quality may be affected	Land temporarily withdrawn from agricultural use			
Visitor												
	Health and wellbeing opportunities increased	Increased choice of place for	Increased access potential to	Smaller sites tend to be small scale friendly	Smaller sites tend to be quieter.		Access to the National Park may not be in the 'right place'.	Some hotspots – over visited	Amenity of neighbours. Noise Light.	Potential for conflict with other visitors	Visitor safety a concern ²²	Sometimes visitor conflict is on

¹⁷ **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.

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

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

²⁰ 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.

²¹ 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.

²² **Visitor's safety:** Permitted Development Rights is putting people into different locations for recreation than they would generally go. Recreation is managed through known access points, e.g. car parks. Visitor's to more remote areas may not benefit from advice or signage regarding, for example beach safety, or travelling on difficult terrain to access the beach.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
		recreational activity.	local history /culture, e.g		attract groups or can easily control those booking				Unsocial hours	and communities		the same site
	Environment											
	Access to the National Park increased.	Connect to nature opportunity ²³	Connect with landscape opportunity	Connect to historic environment opportunity	Set aside opportunity. ²⁴		Soil impaction/ erosion possible	Water Quality may be affected - Phosphates	Flood Zones may be impacted and site equipment damage from flood events	Landscape impacts. Special Qualities ²⁵ Night sky.	Ecology ²⁶ may be affected	Archaeology may be affected
								Water connection ²⁷		Cumulative Impacts of camp sites in one location		

²³ 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.

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

²⁵ **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.

²⁶ 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.

²⁷ **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.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
								Sewerage capacity Sewage disposal is a potential issue ²⁸				
								Water supply ²⁹				
								Water contamination ³⁰				
	Traffic											
							May lead to congestion.	Vehicles unsuitable for minor roads	Opportunity to locate in more accessible locations potentially lost.	More likely to be reliant on the private car in remote locations.		

²⁸ **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.

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

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

PCNPA Integrated Assessment Template

Title of what is being Assessed: Article 4 Direction 28-day Permitted Development

Is this a staged Integrated Assessment: Yes, the Stage 1 Integrated Assessment will be reviewed following the public consultation period.

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

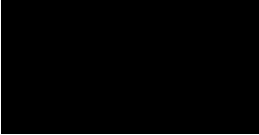
- Comply with the Public Sector Equality Duty (we are required to assess equality impacts under the Welsh Specific duties.)
- Demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-Economic 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

Name of Strategic Plan, Policy or Decision being assessed	<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"> 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. 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 portaloos are permitted without planning permission.
Department/ Service Area	Planning
Officer Responsible for Impact Assessment	Name: Martina Dunne M & S Town Planning Ltd on behalf of Sara Morris (Stage 1 pre consultation)
Responsible Senior Manager	Name: Sara Morris Title: Director of Placemaking, Decarbonisation and Engagement
Timetable for the Assessment	Stage 1 Assessment to accompany the National Park Authority Committee papers NPA 1st May, (deadline 15th April). The Stage 1 Assessment will form part of a 3-month public consultation and will be updated to reflect representations received before the National Park Authority Committee consider progressing an Article 4 (1) Direction in the Autumn 2024. The draft proposal is to introduce a non-immediate Article 4 (1) Direction for 28-day caravan and camping sites.

Monitoring and Review of Assessment	See above under Timetable for the Assessment.
STAGE 1 (PRE PUBLIC CONSULTATION): Chief Executive Sign Off – Completed Assessment and Summary/ Recommendations	<div style="text-align: right;">Sign off date:</div> <div style="text-align: center;">  </div> <div style="text-align: right;">17/04/2024</div>

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

What is its proposed purpose?
<p>To introduce a non-immediate effect Article 4 (1) Direction for the whole of the Pembrokeshire Coast National Park. The National Park Authority’s intention if taken forward following consultation would be to 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"> (a) Tents and trailer tents to be used for no more than 28 days in a calendar year. (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. (c) No more than one caravan 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. <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> <p>Explanatory Note of Permitted Development Rights under The Town and Country Planning (General Permitted Development) Order 1995: Part 5 A Permitted Development:</p>

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.

Is it new or existing and under review?

It would be new if taken forward.

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

See above under 'What is its proposed purpose?'

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.

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 – **Appendix D** to the Committee's Covering Report. The intention if the Authority progresses beyond consultation stage is to pursue an Article 4(1) Direction without immediate effect. This would provide sufficient time to seek planning permission by delaying introduction of the Article 4 Direction.

Detail the budget implications relating to it?

Budgetary provision is made for the consultation associated with an Article 4 (1) consultation within existing budgets. If an Article 4 (1) Direction was introduced then 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 positive.</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 positive in terms of approach to introduction. Will re consider potential impacts following consultation period

	<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>This means that the process of introducing an Article 4 Direction would:</p> <ul style="list-style-type: none"> ➤ 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. ➤ Require consulting and seeking the opinion of those who are affected. ➤ ensure there is better control of unregulated caravan and camping sites thus ensuring that: <ul style="list-style-type: none"> ○ 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.¹ <p>It is also intended that the Authority would implement the Article 4 Direction across the Local Planning Authority area meaning that the implementation would be the same in every area.²</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 ³ which screened all policies against 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>and representations received.</p>
--	---	--------------------------------------

¹ Workshop with Stakeholders 8th February 2024 and Pros and Cons table attached to this assessment.

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

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

	<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>	
Disability	<p>See previous for Age</p> <p>Pembrokeshire Council Licence Conditions for a Tent Site/ holiday site for touring caravans include following requirement:</p> <ul style="list-style-type: none"> • Particular consideration shall be given to the needs of the disabled in the provision made for water points, toilets, washing points and showers. 	<p>Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.</p>
Gender Reassignment	<p>See previous for Age</p>	<p>Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation</p>

		period and representations received.																								
Pregnancy and Maternity	See previous for Age	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.																								
Race	<p>See previous for Age</p> <ul style="list-style-type: none"> Pembrokeshire has a higher % of people identifying as White: Gypsy or Irish Traveller at 0.5% (560) than Wales at 0.1%. <table border="1"> <thead> <tr> <th rowspan="2">Ethnic group (detailed)</th> <th colspan="2">lacu2021:Pembrokeshire</th> <th colspan="2">country:Wales</th> </tr> <tr> <th>number</th> <th>%</th> <th>number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Total: All usual residents</td> <td>123,363</td> <td>100.0</td> <td>3,107,496</td> <td>100.0</td> </tr> <tr> <td>White: Gypsy or Irish Traveller</td> <td>560</td> <td>0.5</td> <td>3,370</td> <td>0.1</td> </tr> <tr> <td>White: Roma</td> <td>34</td> <td>0.0</td> <td>1,843</td> <td>0.1</td> </tr> </tbody> </table> <p>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.</p>	Ethnic group (detailed)	lacu2021: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 positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.</p> <p>The proposed introduction of a non-immediate effect Article 4 Direction for the whole of the Pembrokeshire Coast National Park will not</p>
Ethnic group (detailed)	lacu2021: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																						

	<ul style="list-style-type: none"> Local Development Plan 2 has Policy 53 Gypsy, Traveller and Showpeople Sites: 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 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’ 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>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 positive in terms of approach to introduction (as per Age). Will re consider

		potential impacts following consultation period and representations received.
Sex	See previous for Age.	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.
Sexual Orientation	See previous for Age	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts following consultation period and representations received.
Marriage and Civil Partnership	See previous for Age.	Noted that potential impact is positive in terms of approach to introduction (as per Age). Will re consider potential impacts

		following consultation period and representations received.
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"> ➤ 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. ➤ require seeking the opinion of those who are affected. <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 in every area.</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.</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>Feedback from Exploratory Workshops has provided an opportunity to develop the Table identifying pros and cons attached to this 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>Both positive and negative implications are identified. 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.</p> <p>No application fees 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 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 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>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"> - A guidance note - See Appendix D to the Committee's covering report. - A no fee requirement for what are 28-day site proposals - A lead in time for introducing the Article 4
--	--	---

		<p>Direction to allow applicants an adjustment time to get their planning permissions in place (e.g.12 months)</p> <p>Will re consider potential impacts following consultation period and representations received.</p>
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.
Health and Well-being Outcomes and Inequalities	<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.</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>	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

	<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 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>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 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</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>applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated</p>
--	--	--

Public Sector Equality Duty Considerations

<p>How does the Strategic Plan, Policy or Decision being assessed promote equality of opportunity?</p>	<p>It would allow people the opportunity to influence what is happening in their community – see Group focused impact assessment above. 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 on the proposals and on individual planning applications would ensure representations are considered promoting good relations. The proposal should enable well planned campsites in accessible locations, avoiding those that cause amenity concerns for neighbours. The Authority can be proactive through both the biannual meetings and through pre-application advice etc. The refusal of a planning permission or misinterpreting the proposal as a complete stop to caravan and camping could cause bad feeling.</p>

Does this Strategic Plan, Policy or Decision have the potential to cause unlawful direct or indirect discrimination?	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.
Does this Strategic Plan, Policy or Decision have the potential to exclude certain group of people from obtaining services, or limit their participation in any aspect of public life?	Consultation on the proposals and on individual planning applications would ensure representations are considered promoting inclusivity. Currently 28-day site proposals do not require public engagement.
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</p> <p>If yes, what steps will you put in place:</p> <ul style="list-style-type: none"> - Requiring Exploratory Workshops as part of the commission - Requiring the preparation of an Integrated Impact Assessment of the proposal - Ensuring that formal consultation complies with the National Park Authority's Local Development Plan Delivery Agreement for engaging with the public. - Requiring papers to be prepared for workshops, Committee meetings including the preparation of reports of consultations on feedback from consultations carried out.

Data/ Engagement Gaps

Do you have any data/ engagement gaps?	A Background Paper has been prepared to accompany the formal consultation – Appendix A to the Committee Report. This document will form part of the consultation and comment invited on the data. The wider public consultation should assist with providing an informed view of the proposals.
--	---

	<p>These responses will be considered before the National Park Authority make a final decision on progressing the Article 4 Direction.</p> <p>Potential impacts will be re considered following the consultation.</p>
<p>If yes, can further information be obtained or additional engagement to fill any of these data gaps?</p>	<p>See previous answer.</p>

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

<p>Equality Summary/ Recommendation from Assessment:</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"> ➤ 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: <ul style="list-style-type: none"> • 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.⁴
--

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

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

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
Use of Welsh Language	<p>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).</p> <p>The proposal 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 during preparation and approval process.</p> <p>Positive that proposal would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas.</p> <p>Will re consider potential impacts following consultation period and representations received.</p>
Number of Welsh Speakers	See above.	See above.
Fluency and Confidence of Welsh speakers	See above.	See above.

and learners to use Welsh		
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 will form part of the consultation and comment invited on the data. The wider public consultation should assist with providing an informed view of the proposals.</p> <p>These responses will be considered before the National Park Authority make a final decision on confirmation of the Article 4 Direction.</p> <p>Potential impacts will be re considered following the consultation.</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).

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>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>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.</p>	This is a positive outcome.

	<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.</p> <p>Both positive and negative implications are identified. 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.</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"> ➤ Number and type of sanitation facilities. ➤ Disposal of refuse ➤ Water supply and wastewater disposal ➤ Appropriate locations for chemical toilet disposal <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.</p>	<p>This is a balanced outcome ensuring that access is managed to avoid harm to the National Park.</p>

	<p>The table in the 'Environment' Row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park.</p> <p>Both positive and negative implications are identified.</p> <p>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.</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>	
Built Environment – Built Heritage	<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>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. Policy 8 d) 'the historic environment is protected and where possible enhanced' would be considered when reaching conclusions on applications submitted.</p>	This is a balanced outcome ensuring that the historic environment is not harmed.
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	This is a positive outcome.

	edited to include the need to locate sites in more accessible locations. By not progressing the Article 4 Direction the private car is more likely to be used.	
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"> ➤ Number and type of sanitation facilities. ➤ Disposal of refuse ➤ Water supply and wastewater disposal ➤ Appropriate locations for chemical toilet disposal ➤ Appropriate safety on site and appropriate licensing for any facilities on-site such as shops, restaurants, swimming pools, hot tubs etc. 	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 – Appendix A to the Committee Report. This document will form part of the consultation and comment invited on the data. The wider public consultation should assist with providing an informed view of the proposals.</p> <p>These responses will be considered before the National Park Authority make a final decision on progressing the Article 4 Direction.</p> <p>Potential impacts will be re considered following the consultation.</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

<p>Section 6 Biodiversity Duty and Decarbonisation Summary/ Recommendation from Assessment:</p> <p>In summary the proposals are likely to have a significant positive effect on the Authority’s biodiversity duty and would support its decarbonisation agenda.</p>

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 ⁵ 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 ⁶ 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.
A Healthier ⁷ Park/ Pembrokeshire / Wales	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. 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 more positive outcome is likely than is currently being experienced.

⁵ 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.

⁶ 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).

⁷ 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.

A More Equal ⁸ Park/ Pembrokeshire / Wales	<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"> <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. <input type="checkbox"/> mean the opinion of those who are affected would be sought. <input type="checkbox"/> mean that there is better control of unregulated caravan and camping sites thus ensuring that: <ul style="list-style-type: none"> • mean the amenity of neighbouring properties and local communities are more fully considered. • mean remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services. <p>See also commentary under a 'Prosperous Park' as well.</p>	A positive impact
A Park/ Pembrokeshire/ Wales of Cohesive ⁹ 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	Please see commentary under 'Welsh Language' above and under 'Built Environment, Heritage' under Section 6 'Biodiversity and Decarbonisation'.	Positive Impact.

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

⁹ Attractive, viable, safe, and well-connected communities.

Culture & Thriving Welsh Language ¹⁰		
A Globally Responsible ¹¹ 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 ¹²	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 ¹³	This is clearly identified through the first exploratory workshop undertaken and as shown in the Pros and Cons Table.	Positive outcome.
Integration ¹⁴	The proposed Article 4 Direction would nest within the Authority’s Local Development Plan’s Strategy for caravan and camping. The National Park Authority’s Corporate and Resources Plan 2023 to 2027 identifies priorities in relation to: <ul style="list-style-type: none"> - Boosting biodiversity and halting its decline - Destination Net Zero for the National Park 	The assessment has identified significant positive impacts in terms of biodiversity and. Contributions towards reducing carbon emissions, ensuring greater inclusivity in

¹⁰ 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.

¹¹ 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.

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

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

¹⁴ 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.

	<ul style="list-style-type: none"> - People being healthier and happier and more connected to nature and heritage. - People have a chance to live work and enjoy the National Park 	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).
Collaboration ¹⁵	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.	There has been collaboration.
Involvement ¹⁶	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 consultation on the proposal before a final decision is made regarding progressing.	Involvement continues.
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.

¹⁵ 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.

¹⁶ 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.

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

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

The proposals fit well within the Well-being Goals and the 5 Ways of Working. Horizon scanning will continue as the project progresses.

Section 4 – Follow up Actions – for inclusion in Integrated Assessment Log for Monitoring

Action	Responsible Officer	Timescales
Review this draft Integrated Assessment following the public consultation on the Proposals	Sara Morris Director or delegated Officer	August/September 2024
Welsh Language Standards to be complied with during preparation and approval process.	Sara Morris	

Please forward completed integrated assessments to mairt@pembrokeshirecoast.org.uk

Appendix B Part 2 Caravan and Camping in the National Park – Permitted Development ¹⁷- Pros and Cons

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

Pros ¹⁸	A	B	C	D	E	Cons ¹⁹	A	B	C	D	E	F
Economic												
	Income generation and spend in the locality ²⁰	Employment generator	Temporary land take. Marginal land used. Exempted sites tend to be small scale. ²¹	Farmers can diversify.	Able to act now.		'Uneven playing pitch' for competitors	Agricultural land quality may be affected	Land temporarily withdrawn from agricultural use			
Visitor												
	Health and wellbeing opportunities increased	Increased choice of place for	Increased access potential to	Smaller sites tend to be small scale friendly	Smaller sites tend to be quieter.		Access to the National Park may not be in the 'right place'.	Some hotspots – over visited	Amenity of neighbours. Noise Light.	Potential for conflict with other visitors	Visitor safety a concern ²²	Sometimes visitor conflict is on

¹⁷ **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.

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

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

²⁰ 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.

²¹ 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.

²² **Visitor's safety:** Permitted Development Rights is putting people into different locations for recreation than they would generally go. Recreation is managed through known access points, e.g. car parks. Visitor's to more remote areas may not benefit from advice or signage regarding, for example beach safety, or travelling on difficult terrain to access the beach.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
		recreational activity.	local history /culture, e.g		attract groups or can easily control those booking				Unsocial hours	and communities		the same site
	Environment											
	Access to the National Park increased.	Connect to nature opportunity ²³	Connect with landscape opportunity	Connect to historic environment opportunity	Set aside opportunity. ²⁴		Soil impaction/ erosion possible	Water Quality may be affected - Phosphates	Flood Zones may be impacted and site equipment damage from flood events	Landscape impacts. Special Qualities ²⁵ Night sky.	Ecology ²⁶ may be affected	Archaeology may be affected
								Water connection ²⁷		Cumulative Impacts of camp sites in one location		

²³ 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.

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

²⁵ **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.

²⁶ 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.

²⁷ **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.

Pros 18	A	B	C	D	E	Cons 19	A	B	C	D	E	F
								Sewerage capacity Sewage disposal is a potential issue ²⁸				
								Water supply ²⁹				
								Water contamination ³⁰				
	Traffic											
							May lead to congestion.	Vehicles unsuitable for minor roads	Opportunity to locate in more accessible locations potentially lost.	More likely to be reliant on the private car in remote locations.		

²⁸ **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.

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

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

Would you support some additional restrictions beyond those in place at present?

Summary of responses: There was a general acknowledgement that further work was needed to be done to better manage permitted development rights. Whilst some participants to the workshops considered that both 28-day sites and exemption organisations should be subject to an Article 4(1) Direction some considered that increased engagement with Exemption Organisations would be sufficient to improve working practices.

Would you support a wholesale introduction – i.e., for the whole National Park or trial area?

Summary of responses: On balance a Park wide introduction of an Article 4(1) Direction was favoured. There were some concerns that because of the wholesale introduction potentially causing unintended consequences in Pembrokeshire County Council's planning area, then a trial area might be more favourable. However, given the concerns outlined under the 'Pros and Cons table' used in the Workshops on balance a more wholesale introduction was considered to be appropriate. When discussing whether more sensitive zones could be considered it was felt that these issues were prevalent throughout the National Park, so it would be hard to pick out an area without referring to another.

Would you support a 28-day rule Article 4(1) Direction?

Summary of responses: This was the most supported element of the discussions. There were suggestions that the National Park Authority should do more to monitor such sites with reference to how, in England, local planning authorities are notified regarding such proposals. The notification requirement does not however, exist in Wales and could only be brought about by legislative change which is not within the National Park Authority's powers.

To assist those who wish to bring forward 28-day rule proposals a draft advice note (Appendix D) has been prepared for approval for consultation.

The intention is to allow feedback on the draft advice note over the consultation period. This consultation response will be reported back to Members when they consider whether to take forward the Article 4(1) Direction for 28-day rule sites.

Would you support Article 4(1) on exempted organisations as well?

Summary of responses: There was a mixed response on this proposal with some Exempted Organisations considering that there was a degree of self-regulation which should be sufficient. As Welsh Government ultimately issue certificates for exempted organisations, Welsh Government also do have powers to intervene and decline to issue a certificate if issues in terms of an organisations operational methods are identified. Given this position, removing permitted development rights

for exempted organisations at this stage was considered unnecessary, with a shared Protocol enabling better collaboration between exempted organisations and regulatory bodies preferred as a first step.

Initial thoughts regarding a protocol are that it would require the following, however a specific project looking at this could be established:

- Establish biannual meetings with organisations and regulators.
- Establishing a record of sites operating, days of operation and details of onsite structures, water supply and sewage disposal etc.
- Establishing communication channels to consider concerns by regulatory bodies where sites that cannot have concerns mitigated satisfactorily are not being taken forward.

This was considered to be a useful way forward and the National Park Authority could monitor the success of this approach and report outcomes to Welsh Government with a further opportunity to revisit the debate on Article 4(1) Directions if necessary, in the future.

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

On 31st October 2025 a Park-wide Article 4 Direction was introduced to protect the environment of the Pembrokeshire Coast National Park, its communities and special qualities by requiring planning permission for

- **All 28-day camping sites**

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

This advice note is for use only for those wishing to operate a camping site¹ for up to 28 days a year. It should be read alongside the National Park Local Development Plan and Supplementary Planning Guidance on Camping, Caravans and Chalets.

When considering a planning application for a 28-day camping site, the National Park Authority will base its decision on the policies set out in National Planning Policy (Planning Policy Wales)² prepared by the Welsh Government, the Local Development Plan 2 for the National Park³ and the adopted Supplementary Planning Guidance on Camping, Caravans and Chalets.⁴

Information on how to apply for planning permission can be found on the National Park Authority’s website⁵ – see [here](#).

Section 1: Before you apply

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

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

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

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

³ Local Development Plan 2 - Pembrokeshire Coast National Park

⁴ Caravan and Camping Supplementary Planning Guidance - Pembrokeshire Coast National Park

⁵ [Planning Advice - Pembrokeshire Coast National Park](#)

- The time-period during which you intend to operate your site in one calendar year. The 28 days do not have to be consecutive. (Temporary facilities⁶ sited on the land such as toilets/showers will count towards the tally – even if there are no pitches occupied.)
- How you will deal with waste generated by visitors to your site.
- How you will deal with grey water/sewage generated by visitors to your site.

Section 2: Things to be aware of

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

1. Land designated as a Site of Special Scientific Interest (SSSI)⁷.
2. High grade agricultural quality land (Grade 1,2 or 3a)⁸;
3. Land within a C2 flood zone (Zones 2 and 3 on the Flood Map for Wales)⁹;
4. Land at the coast or on the Preselis or in locations visible from the coast or Preselis¹⁰. (See Policy 41 of the Local Development Plan 2).

The Supplementary Planning Guidance¹¹ indicates which areas have landscape capacity to tolerate further camping sites. Table 6 (page 20) of this guidance provides a quick guide to show where capacity for more sites is available and which areas already are at capacity in terms of impact on the landscape. In all cases however, the effects of individual sites would need to be considered on an individual basis.

In addition, you will need to consider:

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

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

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

⁸ [Agricultural land classification | GOV.WALES](#)

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

¹⁰ [Local Development Plan 2 - Pembrokeshire Coast National Park](#)

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

Section 3: Good Practice

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

1. Avoid prominent and/or sensitive locations.
2. Use an enclosed area which helps to reduce visual prominence.
3. Make use of existing features and landscaping to help screen the site.
4. Skyline locations are best avoided.
5. Avoid using multiple fields.
6. Associate with farm complexes if possible.
7. Use improved pasture land, arable or brownfield land¹².
8. Avoid tranquil and remote locations.

How your application will be considered

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

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

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

A report will be written by a planning officer detailing all the information about your proposal, how it addresses policy requirements and any expert advice provided. Whilst some applications have to be considered by the Authority's Development Management Committee, most are determined through powers delegated by the Committee to the Chief Executive. You will need to plan ahead as planning applications can take 8 weeks to determine.

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

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

1. New permanent buildings/structures
2. Creation of access tracks

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

3. External lighting
4. Use of facilities such as outdoor kitchens/hot-tubs/individual toilets/showers
5. Amplified music

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

Your Planning Permission

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

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

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

Further information

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

Fees

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

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

Questionnaire for consultation on Art 4 Direction for Camping and Caravan

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

The Town and Country Planning (General Permitted Development) Order 2015 allows temporary caravan and campsites to operate without the need to apply for planning permission as follows:

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

The National Park Authority and other organisations in Pembrokeshire are moving towards a regenerative tourism strategy where visitors have a positive experience and positive impact and deliver a net benefit to the natural environment. Evidence set out in the Background Paper on Camping and Caravanning in Pembrokeshire Coast National Park – Managing Impacts – sets out issues that have arisen from an increase in camping and caravanning activity, particularly in the last decade. The Background Paper sets out a number of options to manage new camping and caravan sites and we are seeking your views on the options. Having carefully weighed the options available, the Authority's preferred option is to introduce an Article 4 Direction to remove permitted development rights for 28-day camping and caravan sites (option 3). Alongside this Officers of the Authority consider that increasing engagement with permitted development site operators, particularly Exempted Organisations by introducing a voluntary Code of Conduct / Working Protocol could improve and enhance standards and effective working practices (option 2). The Authority welcomes your views on the proposed options to inform the future action that the Authority will take.

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

Strongly Agree

- Agree
- Neutral
- Disagree
- Strongly Disagree

Please expand on your answer below:

Please indicate your views on each option.

Option 1: Do nothing	Strongly Support <input type="checkbox"/>	Support <input type="checkbox"/>	Neutral <input type="checkbox"/>	Oppose <input type="checkbox"/>	Strongly Oppose <input type="checkbox"/>	Reason for response:
-----------------------------	--	-------------------------------------	-------------------------------------	------------------------------------	---	----------------------

Option 2: Increase engagement with permitted development site operators (preferred option for Exempted Organisations alongside option 3)	Strongly Support <input type="checkbox"/>	Support <input type="checkbox"/>	Neutral <input type="checkbox"/>	Oppose <input type="checkbox"/>	Strongly Oppose <input type="checkbox"/>	Reason for response:
Option 3: Introduce the requirement for planning permission for camping and caravan sites which can operate for up to 28 days (preferred option)	Strongly Support <input type="checkbox"/>	Support <input type="checkbox"/>	Neutral <input type="checkbox"/>	Oppose <input type="checkbox"/>	Strongly Oppose <input type="checkbox"/>	Reason for response:
Option 4: Introduce the requirement for planning permission for camping and caravan sites which can operate with an exemption certificate	Strongly Support <input type="checkbox"/>	Support <input type="checkbox"/>	Neutral <input type="checkbox"/>	Oppose <input type="checkbox"/>	Strongly Oppose <input type="checkbox"/>	Reason for response:
Option 5: Introduce the requirement for planning permission for camping and caravan sites which can operate for 28	Strongly Support <input type="checkbox"/>	Support <input type="checkbox"/>	Neutral <input type="checkbox"/>	Oppose <input type="checkbox"/>	Strongly Oppose <input type="checkbox"/>	Reason for response:

days and can operate with an exemption certificate						
---	--	--	--	--	--	--

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

Which of the following best describes you?

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

What is your age group?

Under 18

18-24

25-34

35-44

45-64

55-64

65 and over

Prefer not to say

Thank you for your response to the consultation.

FAQs – National Park Consultation on How to Manage Impacts associated with Camping and Caravanning in Pembrokeshire

1. What is the National Park running a consultation on?

The National Park has published a Background paper on how best to manage the impacts associated with camping and caravanning in Pembrokeshire. This paper sets out a range of possible options, including two preferred options. The two preferred options include:

- a) Removing permitted development rights for camping and caravan sites to operate under what is commonly known as the '28 day rule'.
- b) Establishing a voluntary Code of Conduct / Working Protocol to ensure better engagement between exempted organisations who operate certificated sites and regulators, including two biannual meetings to discuss new sites and the operation of existing sites.

2. What is permitted development?

Permitted development is development which can be carried out without the need to apply for planning permission, as it is already granted by the Town and Country Planning (General Permitted Development Order) 1995, as amended for Wales.

3. What are 28 day rule sites?

There are two parts of legislation which enable use as a campsite for 28 days.

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.

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 Caravan Sites and Control of Development Act 1960. 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. However, Class B of Part 5 permits any development

required as a condition of a site license under the 1960 Act or the Mobile Homes (Wales) Act 2013.

The National Park is aware of some issues and problems as a result of these permitted development rights – these are set out in the Background Paper on managing impacts associated with camping and caravanning.

4. What is an exempted organisation?

Organisations which meet certain requirements can apply to the Welsh Government for exemption certificates¹ 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);
- 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.

5. What happens when there is an Article 4 Direction in place?

This is a Direction which 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

¹ [Camping licence \(England and Wales\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Article 4 Directions in place in relation to Conservation Areas in order to protect the historic environment.

6. If I already own a campsite will these proposals affect me?

The table below shows which sites might be impacted by the proposals:

Type of campsite	Is there an Option for additional controls in the public consultation?	What option is proposed?	What would this mean for my site if implemented?
Camping and caravan site with existing planning permission in place	No	N/A	No change.
Campsite operating under 28 day rule	Yes	One option sets out a potential introduction of an Article 4 Direction for these sites.	If chosen and progressed this would mean that sites would need to gain planning permission to operate for 28 days. No fee would be chargeable for this. The earliest potential date of introduction would be 2025.
Campsite operating under an exemption certificate for more than 28 days	Yes	Two options are included in the background paper for discussion – one is the potential of an Article 4 Direction for these sites. This is not identified as a Preferred Option however. Another option which is identified as a Preferred	If chosen and progressed an Article 4 would mean that sites would need to gain planning permission to operate for the current 60 days permitted via exempted organisations. No fee would

		Option is to develop a Code of Conduct /Working Protocol as a first step to improve collaboration between regulators and exempted organisations.	be chargeable for this. The earliest potential date of introduction would be 2025. If chosen and progressed the option of a Code of Conduct / Working Protocol would be developed with the exempted organisations in mid 2025.
--	--	--	--

7. If the changes in the consultation come into being, when will they take effect?

At this stage, the National Park Authority is simply gathering views and will feed these back to the Members of the National Park Authority in Autumn 2024. If a decision is made to progress with any of these options via an Article 4 Direction there will be a further opportunity to make representations, likely to be in Autumn 2024 and early 2025.

8. If I operate a site in Pembrokeshire, but outside the National Park am I affected by the consultation?

The consultation is only in relation to land located within the National Park. If you operate a site outside the National Park then the proposals in relation to an Article 4 Direction will not affect you.

Exempted Campsites operating outside the National Park may be invited to join a voluntary Code of Conduct for Exempted organisations however.

9. Will an Article 4 Direction on camp sites stop my family camping in my garden, or staying in a caravan on my drive for the night?

No – the proposals for an Article 4 Direction for campsites are aimed at land that does not have an existing residential use. People camping or staying in a caravan within a residential curtilage will not be impacted by these changes.

10. How do I know if I need planning permission to do something?

Pembrokeshire Coast National Park Authority operates a pre-application service which provides information on whether proposals are permitted development or not. The pre-application service also identifies whether planning permission is likely to be granted, where development does require planning. More information and the fees chargeable for this service are available here: [Pre-application Advice - Pembrokeshire Coast National Park](#)

11. When does the consultation run until?

The consultation runs until 5pm Friday 20th September 2024.

12. How do I comment on this consultation?

A questionnaire is available on our website. [Public Consultations - Pembrokeshire Coast National Park](#)

13. What happens after this consultation?

The results of this consultation will be reported back to the Members of the National Park Authority in Autumn 2024. Following this feedback, Members will consider the next steps required. If an Article 4 Direction is chosen as a preferred option then a formal notice regarding this process will be issued in October 2024 with the opportunity for formal responses to be made to the Authority over a 3 month period and the potential introduction of any such Article 4 Direction in Autumn 2025.