

Report of: Director of Place and Engagement

Subject: Confirmation of proposed Article 4(1) Direction for 28-day use of land for camping, caravans and /or mobile homes

Decision Required: Yes

Recommendation:

The Authority is recommended to:

- a) Confirm the proposed Article 4(1) Direction for 28 day use of land for camping, caravans and/or mobile homes
- b) Approve the attached documents for publication (see Appendix A – Consultation Report, Appendix B - Background Paper with updated appendices, Appendix C – Integrated Impact Assessment
- c) Note for publication Appendix D – Clarification statement (approved March 2025), Appendix E - Article 4(1) Direction with map (signed 11 December 2024), Appendix F – Working Proccol (approved 11 December 2024), Appendix G - Advice Note (approved 11 December 2024).

1. Key Messages

The Authority has been monitoring the situation with camping in the National Park area for many years but began a process of discussing options to introduce additional controls in Autumn 2023.

Stakeholder workshops with officers, members and agents as well as statutory undertakers and tourism stakeholders took place in Autumn 2023 and early 2024. This led to a non-statutory consultation on a range of options which took place between 29th May and 20th September 2024.

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

In accordance with the requirements of The Town and Country Planning (General Permitted Development Order 1995 (as amended) the Authority then publicised the opportunity for formal representations to be made. The opportunity to make formal representations closed on the 21st February 2025.

¹ [National Park Authority 11/12/2024 - Pembrokeshire Coast National Park](#)

Information on the feedback from consultation undertaken from 10 January to 21 February is summarised in Appendix A and in the background section below. A Background Paper with additional appendices setting out the evidence for an Article 4(1) Direction is published as Appendix B. An updated Integrated Impact Assessment is published as Appendix C.

In March 2025 the Authority published a clarification note on how any Article 4(1) Direction would operate, picking up on questions around non camping uses and how uses such as festivals and weddings might be impacted. In short camping ancillary to those uses would not be considered to be prevented by the Article 4(1) Direction. The clarification note is attached as Appendix D.

Members of the Authority are asked to take a formal decision on whether to confirm the notice of the Article 4(1) Direction. The Article 4(1) Direction would come into effect on 1 January 2026. The signed and sealed Article 4(1) Direction, as signed on 11 December 2024 is attached as Appendix E.

2. Background

2.1 What is an Article 4(1) Direction?

The legal context surrounding an Article 4(1) Direction is set out below, but in simple terms it is used to remove permitted development rights. Critically an Article 4(1) Direction does not mean that something is not permitted, but it does mean that there is a requirement to apply for planning permission – this can result in an application being approved subject to conditions or in some cases refused.

Article 4(1) Directions for camping already exist in some other parts of the UK including in the Gower where it was introduced in 1977 and in the New Forest National Park, where it was initially introduced in 2022.

2.2 What is being covered by the Article 4(1) Direction?

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:

- a) 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.
- b) 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 landholdings 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.

- c) Class B of part 5 of Schedule 2 of the Town and Country Planning Act (General Permitted Development Order) 1995 (as amended) permits the use of a mobile home for not more than 28 days with the siting of the mobile home for no more than 2 nights.

The consultation responses highlighted a lack of understanding regarding the scope of the Article 4(1) Direction. Concern has been raised regarding the Article 4(1) Direction applying to temporary car parks, weddings, saunas, festivals and other temporary activities. The Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025. The clarification statement outlines key details regarding the proposed Article 4(1) Direction. The statement confirms that the proposed restrictions will apply only to 28-day camping, caravan, and mobile home sites. Other temporary 28-day uses – including triathlons, filming, temporary car parks, and mobile saunas – will not be affected. Additionally, exempted certificate sites and bodies operating under exemption certificates will continue to operate as usual.

The statement also clarifies that camping and caravan use connected to other permitted temporary events, such as weddings, festivals, filming, or agricultural shows, will not require additional planning permission. In assessing whether camping is ancillary to an event, the Authority will consider factors such as licensing, advertising, site usage proportions, and event duration. To assist landowners and site operators, the Authority will offer a free pre-application service for those seeking to submit planning applications under the Article 4(1) Direction. The clarification note also provides guidance on the information required for planning applications.

In addition to the above the Authority has recommended working with other organisations to set up a voluntary Code of Conduct for Exempted Organisations regarding the selection and operation of sites

2.3 Why does the Authority consider an Article 4(1) Direction is needed?

The Authority has prepared a Background paper setting out the reasons that it considers an Article 4(1) Direction is required. This has been supplemented by additional appendices which share case studies illustrating the problems created by the current situation.

National Parks enjoy the highest level of landscape protection possible under legislation. There are two National Park purposes which are set out in the 1995 Environment Act – these are:

to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park;

and

to promote opportunities for the public understanding and enjoyment of the special qualities of the National Park;

These purposes are underpinned by the Sandford Principle which asserts the primacy of the first purpose over the second in cases of obvious conflict.

In accordance with Section 62(2) of the Environment Act (1995), any relevant Authority shall have regard to the national park purposes when performing any functions that would affect land within it. This statutory requirement is further reinforced by Planning Policy Wales Edition 12.

There is also a duty to consider the need to foster the economic and social well-being of local communities, provided this is compatible with the statutory National Park purposes.

The Authority's Background Paper identifies a number of real and specific threats and problems being created by the current situation – these issues are those created by the existing operation of rights under the 28 days permitted development rights. In some cases, there are also breaches of the rights which create further challenges.

2.4 Landscape and Historic Environment

A key issue presented by the current situation is potential adverse effects of 28 day temporary camping or the placement of single caravans on the National Park's landscape. As set out in the Background Paper – the Authority has prepared as part of its evidence base for the adopted Local Development Plan an assessment of the landscape capacity of the National Park to accommodate additional caravan or camping provision. This identified that of 26 Landscape Character Areas 11 were at capacity (including 1 which is the Skomer and Skokholm Islands where this is not considered appropriate) and a further 15 had limited capacity. The capacity study did not include temporary sites, only established camping and caravan sites either with permission or those which are certificated sites. Therefore in some areas, with temporary campsites being added in this would result in being beyond capacity. As set out within the Background paper – there is no ability under the current legislation to direct campsites to less visually sensitive locations. This inability to suggest less sensitive locations also impacts on historic assets – as demonstrated by the case studies, sites may locate even close to Scheduled Ancient Monuments under the current legislation, without control.

As the purpose of an Article 4(1) Direction is to necessitate a planning application so that a proposal might be considered, rather than to ban a use, the above information is considered to justify on landscape grounds the imposition of an Article 4(1) Direction. This would allow the Authority to take a proportional approach considering issues such as individual and cumulative impacts within a particular Landscape Character Area. It would also allow for the LPA to negotiate within individual landowners if required, for example suggesting alternative fields with lower landscape impacts to be considered for use as alternatives if necessary.

2.5 Biodiversity

As identified within the Background paper and appendices, the current situation of permitted development rights does not provide any ability for the Authority to consider sensitive wildlife or environmental constraints. Despite the River Cleddau having Riverine SAC status and the majority of the coast having Marine SAC status the Authority currently has no ability to consider how foul water is disposed of. It can also not consider whether for example a site is within a SSSI, or whether crossing a SSSI is needed to achieve access or operating very close to sensitive areas of bird nesting such as auks or seal pupping. It is acknowledged that permitted development rights do not apply unless consented by the Authority under the Habitats Regulations where there are likely significant effects on an SAC, but it is difficult for the Authority to monitor where there are no application requirements.

2.6 Infrastructure

There is no ability under the current legislation for the Authority to assess highway impacts, water supply or foul water disposal (especially to areas of biodiversity interest, as above).

2.7 Consultation

There is no requirement for public consultation before 28 day permitted development rights can be implemented under the current system and no ability to seek to negotiate alternative accesses or land use should the amenity of neighbouring residents be unacceptably impacted.

All of the above are issues caused even where sites are operating within the permitted development rights available to them and the Authority is not in a position to take any enforcement action as a result of the existence of the permitted development rights.

As set out in the Background Paper and appendices there are also breaches associated with such operations including operational development which is not permitted being left behind on sites (for example toilet blocks and tracks) with associated landscape impacts, which results in challenges to enforcement. The Authority has also had to grant Certificates of Lawful use in some circumstances where sites have repeatedly operated beyond their permitted days because of the challenges of enforcing such sites. It is acknowledged that there are mechanisms for enforcing against breaches of this kind. It is also acknowledged that the many well-run sites should not be penalised by the activities of those who do not follow the rules but, as a matter of judgement, it is officers view that the operation of 28 days rights does enable abuse and worsens the harm created by the problems of existing operations.

2.8 What are the economic and social impacts of introducing an Article 4(1) Direction?

These have been assessed under the Integrated Impact Assessment. This is an iterative document which has been updated at various stages of considering this matter.

As set out in that document, the application process is a free one, however there will be a cost to applicants associated with preparing a planning application in terms of time taken and expense should they wish to employ a planning agent. The Authority has sought to mitigate this by introducing free pre-application advice. Given that no elevational plans are required for this type of planning application, information necessary to support an application will be limited to information on site location (red line boundary, numbers of pitches, highways access point and information on disposal of foul water). In areas of ecological sensitivity an ecological survey will also be required, but this would not be necessary on improved agricultural land. Applicants would be able to apply for longer permissions if they wish to minimise costs involved in preparation of an application.

There is the potential that some sites will not operate either because they are refused planning permission or they simply close down because the application process is impracticable for them, with associated financial impacts on that landowner. There may be a reduction in the number of sites overall. There is also the possibility that there is a slightly higher cost to some families of staying in authorised sites who have invested in additional facilities. There is also potential for uncertainty for sites that do not apply for or receive permission promptly, with consultation processes meaning that applications will take a minimum of 5 weeks and statutory determination times of 8 weeks, with some applications potentially running over this. The Authority is seeking to minimise this risk by agreeing to prioritise the determination of these application types; and by carefully considering the timing of the confirmation decision and coming into force of the Article 4(1) Direction but it is acknowledged where permissions are granted on a temporary basis there is scope for repeated uncertainty.

Set against these considerations is the fact that the Authority already has 7,500 authorised pitches and that the research undertaken into pitch costs does not suggest a significant difference in cost of pitches between authorised pitches and those operating under 28 day rules. However, there is a slight difference, which reflects higher levels of amenities available on sites which are authorised.

Groups such as the Scouts organisation are a registered and certified organisation which will not be impacted by the limited Article 4(1) Direction being proposed. Certificated organisations will not be impacted by the introduction of the Article 4(1) Direction and nor will those existing authorised sites who either benefit from a planning permission or a certificate of lawful use.

Overall, whilst it is difficult to estimate the precise outcomes of the Article 4(1) Direction, there is likely to be some negative economic impact on a limited number of landowners.

There are also financial impacts for the National Park Authority, without additional funding and potentially impacts for other applicants for planning permission if delays in the planning system are caused. These are likely to be minimised, with the identification of resource available to deal with planning applications and with the previously agreed prioritisation of these application types.

The extent of any detrimental impact should be set against the benefits of higher standards for the environment and a better visitor experience.

Overall, the economic impact is not considered likely to be of a scale to materially impact on the wider economy of the National Park.

2.9 What has been the outcome of various consultations on this matter?

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

Feedback from statutory undertakers during these processes flagged that there was currently a lack of ability to check foul water discharge mechanisms.

On 1st May 2024 the Authority agreed to undertake consultation and engagement on a range of options to better manage camping and caravan site developments in the National Park. This consultation took place between 29 May and 20 September 2024. This consultation demonstrated majority support for an Article 4(1) Direction and led to this being progressed. A total of 120 responses were received via the online questionnaire.

- The majority of those who responded (62%) considered that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape
- The majority of those who responded to the survey (60%) considered that more controls are required for camping and caravan development
- There is majority support (61.7%) for introducing an Article 4(1)
- Direction to better manage sites currently operated under 28-day permitted development rights

The most recent public consultation took place over a 6 week period from 10 January to 21 February 2025. The majority of those responding to this consultation objected to the proposed introduction of an Article 4(1) Direction. 216 responses were received to the online questionnaire and 14 emails were received. Out of the 216 respondents to the online questionnaire:

- 180 respondents, 83% do not support the introduction of the Article 4(1) Direction
- 34 respondents, 16% support the introduction of the Article 4(1) Direction
- 2 respondents, 1% answered don't know whether to support the introduction of the Article 4(1) Direction.

When considering these responses Members should be aware that in some cases multiple responses were received from the same business and that during this consultation there was a significant campaign resulting in some misleading press coverage, including for example suggestions in headlines that all festivals would leave Wales if the Article 4(1) Direction was introduced.

As part of the most recent consultation, a number of objectors raised specific concerns in relation to the operation of festivals. The Authority has carefully considered this point and its clarification statement in March 2025 has made it clear that festivals where camping and caravanning is ancillary in use will not be captured by the current proposals.

The respondents who did not support the Article 4(1) Direction raised concerns regarding:

- The economic impact on small businesses and farmers and also on the wider local economy and tourism.
- Social impacts on young people and families on low incomes accessing affordable holidays
- Environmental impacts as camping is a low impact way to enjoy the countryside and connect with nature and the natural environment
- Lack of evidence regarding issues with 28 day campsites
- Lack of consultation and pre-determined outcome regarding the consultation
- Cost and time of preparing planning applications
- Impact on the Welsh language through less visitors to the area experiencing the Welsh language and culture and less business opportunities forcing Welsh-speaking people to leave the area

It is clear that when broad options for controls were considered there was widespread support for the option of a limited Article 4(1) Direction. It is clear that the majority of those responding to the formal representation period object to the proposals, however this must also be understood in a context of misleading reporting on this matter and multiple responses from some businesses. There was also widespread concern regarding the operation of festivals which has been addressed by the clarification note.

3. Legal Background

3.1 Article 4 Direction

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

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

Article 4(1) Directions can be made with or without immediate effect. Article 4(1) Directions are normally made when the character of an area of acknowledged importance would be threatened.

The Development Management Manual published by Welsh Government states:

3.2.10 In exceptional circumstances, the planning permission which the GPDO grants for a class of development may be withdrawn in a particular area by a direction made by the LPA or by the Welsh Ministers under article 4 of that order. Such action will rarely be justified unless there is a real and specific threat i.e. there is reliable evidence to suggest that permitted development is likely to take place which could damage an interest of acknowledged importance and which, in the public interest, should be fully considered through a planning application. Similarly, conditions should only be imposed on a planning permission to restrict or withdraw permitted development rights in exceptional circumstances.

As set out above in the Background section, the National Park is an area identified as being afforded the very highest level of landscape protection with specific purposes identified within the 1995 Environment Act. The threats identified to its landscape and wider environment by the current situation are clearly identified and evidenced in the Background Paper and supporting appendices.

The confirmation of an Article 4(1) Direction does not prevent planning permission being issued but requires planning permission to be sought for all proposals within the 28 day caravan and camping category. This provides the opportunity for the Authority to support development which is consistent with the strategy and policies of the Pembrokeshire Coast National Park Local Development Plan 2 and other planning policies - it also allows for consultation with the general public and key regulators. It also means that, if necessary, inappropriate development within the sensitive landscape of the National Park may be resisted, in accordance with the Authority's statutory purposes after consideration of Future Wales, The Local Development Plan and any other material considerations

3.2 Welsh Government Consultation on Permitted Development Rights

In taking a decision Members should consider that Welsh Government (WG) have recently published a consultation on permitted development rights in Wales. This consultation addresses a number of topics including in relation to 28-day temporary camping. The consultation document can be viewed in full here: [Consultation document](#)

The consultation notes that between November 2021 and February 2022, the Welsh Government consulted on a series of proposals for revisions to permitted development rights. WG note that there was broad support for all of the proposals, with the exception of the proposals for changes to the duration of temporary land use for the purposes of camping. WG note that operation of the 1995 Order grants planning permission for the temporary use of land for up to 28 days each year. An additional 28-day temporary permission was granted during the COVID pandemic, in order to support economic recovery and meet the demand for temporary uses including domestic tourism in the light of restrictions on international travel. This enabled up to a total of 56 days of camping without having to apply for planning permission. The temporary changes to the 1995 Order made by the Town and Country Planning (General Permitted Development) (Amendment) (Wales) (No. 2) Order 2021, applied to all temporary uses of land not just camping and caravanning. Following the end of the pandemic, the additional 28 day provision was not retained, however in England, a new permitted development class was created specifically for

recreational campsites which provided permission for a temporary change of use for up to 60 days each year.

WG state that as the extended operation periods have remained in England, but not in Wales, Welsh businesses assert that they are operating at a competitive disadvantage. WG acknowledge that as circumstances have changed since the COVID pandemic, there is a possibility that views on the issue may have shifted since the 2021 consultation. WG therefore are re-consulting stakeholders on the principle of amending the 1995 Order in respect of recreational campsites.

The WG proposals are to introduce a new specific class of permitted development for recreational campsites within Part 4 of Schedule 2 to the 1995 Order. Camping would then be excluded from Class B in Part 4, except when in connection with a festival.

This would allow campsites to operate for up to 60 days in Wales. There are a number of limitations proposed:

- Change of use could not take place within 100 metres of a protected building (this would be defined as a dwelling not occupied by the landowner or operate of the temporary campsite)

There would also be the following exclusions:

- a) on a site of a scheduled monument;
- b) in a safety hazard area;
- c) in a military explosives storage area;
- d) on a site of special scientific interest;
- e) on a site of a listed building;
- f) for the siting of any caravan except a caravan which is used as a motor vehicle designed or adapted for human habitation.
- g) within Flood Zones 2 or 3.

As with England, WG are proposing to introduce a prior notification process which would allow LPAs to consider matters of vehicular access and wastewater management. The consultation document also states:

We would expect LPAs to take a strategic approach to the use of Article 4 directions. Directions would be made before pop-up campsite proposals are brought forward, utilising their powers in a limited way only in those areas where the road network is severely restricted in width so cannot satisfactorily accommodate a temporary increase in traffic.

In considering the above proposals, Officers have the following observations.

- a) WG have not considered or referenced feedback from this National Park or others around potential landscape harm caused by existing or extended permitted development rights and the prior notification procedure proposed does not allow individual or cumulative impacts to be assessed.

- b) WG have not considered biodiversity impacts (other than to sites within SSSIs) and the prior notification procedure proposed does not allow these to be assessed. This appears to not allow Authorities to properly undertake their Section 6 Duty under the Environment (Wales) Act 2016.
- c) WG have not considered water capacity impacts and the prior notification procedure does not allow these to be assessed.
- d) No limit on campsite numbers is proposed (unlike in England where this is limited to 50 pitches)
- e) No evidence on the 100 metre buffer regarding impacts has been provided by WG as to why and how this adequately protects amenity and landscape impacts.
- f) No consideration appears to have been given to the legislative requirement for WG to consider National Park Duties in preparing legislation.
- g) No consideration on impacts on best and most versatile agricultural land or economic impact on agricultural practices appears to have been made (noting in England anecdotal evidence of farmers choosing to not grow crops that would remove the ability to use recreational campsites in some locations).

The status of this document at this time is one of consultation only.

Whilst the principle of establishing a prior notification procedure for campsites is supported, the extension of days to 60 for its occupation and the extremely limited matters that are proposed as matters for consideration in that process means that this proposal is considered likely to significantly exacerbate the issues facing the National Park currently. Officers will therefore seek to make strong representations suggesting changes and that Protected Landscapes should be exempt from any such introduction.

However, there is no guarantee given the consultation status of this document that these changes will be introduced or when.

Officers suggest that given this uncertainty, Members should proceed on the basis of the evidence before them to confirm the Article 4 (1) Direction as it stands and lobby WG to ensure that the issues facing the National Park and other attractive and sensitive landscapes are appropriately considered before introducing any such changes.

In the case of England – the New Forest National Park took the approach of re-confirming its Article 4 Direction with immediate effect when similar changes were made following its initial implementation. Depending on circumstances, this may be an appropriate route for PCNPA.

4. Financial considerations

The Authority has sufficient budget to undertake the procedures to introduce an Article 4(1) Direction.

When an Article 4(1) Direction is introduced, the Authority is not able to legally charge a planning fee for any planning application for a 28 day site received – this

would be a free application. There would therefore be a resource implication for the Authority in considering such applications. Set against this, however, is the fact that the Authority's Enforcement Officers are currently spending considerable time investigating reported planning breaches for which no fee is provided – overall it is the Officer view that the changes would simplify enforcement investigations and result in a net reduction in officer time on this area of work. Evidence from other areas operating an Article 4 in relation to camping, caravans and/or mobile homes (Gower AONB and the New Forest National Park) suggests that application numbers are relatively low, with some operators choosing to either seek permission for a longer period of time or join an exempted organisation (New Forest National Park).

Setting up a voluntary Code of Conduct / Working Protocol with exempted organisations, as is proposed, would also represent a cost to the Authority. The Authority currently operates a similar system with the Marine Code and Outdoor Charter at a cost of £15,000 per year to administer both codes. This would be an additional cost to the Authority.

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

5. Impact on our Public Sector Duties

5.1 Integrated Assessment Completed: Yes (see Appendix B)

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

A further updated Stage 3 Integrated Impact Assessment has now been prepared and is attached as Appendix C.

5.2 Welsh language impacts

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

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

Respondents to the consultation raised concern about the potential for reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture. Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area given that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. 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. This would enable impacts on the Welsh language to be assessed and suitable mitigation measures identified, if necessary.

5.3 Section 6 Biodiversity Duty and Carbon Emission Impacts

As set out in Appendix C, Stage 3 Integrated Assessment under ‘Section 6 Biodiversity Duty and Decarbonisation’ introducing and confirming the Article 4(1) Direction would enable planning control which means that steps must be taken to be able to change use, i.e. a proposal must obtain planning permission from the Local Planning Authority.

At present there is a risk to waterways (including Special Areas of Conservation and other designated sites) 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. It is acknowledged that there is a process under Regulation 75 of the Conservation of Habitats and Species Regulations 2017 for LPA consent where someone intends to exercise permitted development rights in a way that might have likely significant effects on a Special Area of Conservation, however the National Park has never received an application under this process for a 28-day camping or caravan site and it has limited capacity to monitor when such effects arise.

The framework of the Local Development Plan 2 would be used to assess proposals. The appraisal covers biodiversity, air, land, water quality, access to open space, built heritage, CO₂ emissions and sequestration etc. In summary, the proposals for an Article 4(1) Direction are likely to have a positive effect on the Authority’s biodiversity duty and would support its decarbonisation agenda.

5.4 Equality, Socio- Economic Duty, Human Rights

The Stage 3 IIA (appendix C) provides a detailed appraisal of protected characteristics and issues of equality.

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

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

- Introduce the Article 4(1) Direction procedure with non-immediate effect. This would provide a lengthy lead-in time prior to implementation to give land owners and site operators sufficient time to find out and undertake the requirements of preparing and submitting a planning application.
- Establish a working protocol for Planning Officers to fast track applications submitted following the Article 4(1) Direction for campsites seeking to operate for up to 28 days (see December 2024 NPA Report annexes)

- Officers would consider giving permanent permissions where appropriate.
- Officers will provide free pre-application advice

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

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

5.5 Well-being of Future Generations (Wales) Act

Appendix C, Stage 3 Integrated Assessment considers the proposals fit well within the well-being goals and 5 ways of working under the Future Generations (Wales) Act 2015.

6. Conclusion

The Authority is recommended to:

- a) Confirm the proposed Article 4 (1) Direction for 28-day use of land for camping, caravans and/or mobile homes
- b) Approve the attached background papers for publication.

7. List of background documents:

- Report of consultation (Appendix A)
- Updated Background Paper and Appendices (Appendix B)
- Integrated Impact Assessment, stage 3 (Appendix C)
- Clarification statement (Appendix D)
- Article 4(1) Direction with map (Appendix E)
- Working protocol (Appendix F)
- Advice Note (Appendix G)

(For further information, please contact Sara Morris via saram@pembrokeshirecoast.org.uk.)

Parc Cenedlaethol Arfordir Penfro
Pembrokeshire Coast National Park



Report of Consultations – April 2025

Article 4(1) Direction relating to 28 day camping,
caravan and mobile homes

(Consultation period 10 January to 21 February 2025)

Report of Consultation Article 4(1) Direction

1. Background

The National Park Authority undertook a consultation on Camping and Caravanning Development in the Pembrokeshire Coast National Park from 29 May to 20 September 2024. The consultation presented and considered five possible options to control camping and caravanning in the National Park:

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

A report of consultation was prepared and is available to view on the Authority's website: [Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#) The main findings of the consultation were:

- The majority of those who responded (62%) considered that temporary camping and caravan sites can have a harmful visual impact on the National Park's landscape
- The majority of those who responded to the survey (60%) considered that more controls are required for camping and caravan development
- There is majority support (61.7%) for introducing an Article 4(1) Direction to better manage sites currently operated under 28-day permitted development rights

The Report of Consultation was presented to the National Park Authority (NPA) on 11 December 2024 and Members were asked to approve the introduction of a non-immediate effect Article 4(1) Direction to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days (see NPA Report 47/24).

2. This consultation

The Article 4(1) Direction covering the whole of the Pembrokeshire Coast National Park to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days was signed and sealed on 11 December 2024. The procedures for undertaking an Article 4(1) Direction are set out in The Town and Country Planning (General Permitted Development etc) (Amendment) (Wales) Order 2022 (schedule 2A). The order requires the Authority to invite representations concerning the direction over a period of at least 21 days.

The Authority undertook consultation over a six week period from 10 January 2025 until 21 February 2025. Officers did not serve notice on every owner or occupier within the area, as it was considered impracticable to identify or locate every camp or caravan site owner.

The Authority undertook the following measures:

- A public notice of consultation for Article 4(1) Direction was advertised in the Western Telegraph Paper on 24 December 2024.
- A press release was issued on the PCNPA website
- Advertised the consultation via posts on social media
- The signed and sealed Article 4(1) Direction and map were displayed for public viewing at the Authority's office at Llanion Park, Pembroke Dock and at Oriel Y Parc.
- Bilingual notices to advertise the Article 4(1) Direction and consultation were displayed in the following locations:
 - Newport Memorial Hall
 - Newport Library
 - Saundersfoot Library
 - Da Valence Pavillion, Tenby
 - Oriel Y Parc, St Davids
 - Castell Henllys Iron Age Village
 - Carew Castle
 - Llanion Park, Pembroke Dock

Notification

Notification of the consultation was sent as follows:

- 343 letters were posted to those registered on the LDP database on January 7.
- 76 letters were posted to licenced, exempt and permitted planning campsites on January 7.
- 616 emails were sent to those registered on the LDP database on January 9.

- 310 emails were sent to licenced, exempt and permitted planning campsites operating in the National Park on January 9.
- 18 emails were sent to National Park Authority Members on January 9.
- 43 emails were sent to City, Town and Community Councils on January 9.
- 29 emails were sent to Councillors in the National Park on January 9.
- 29 emails were sent to key stakeholders on January 9.

A copy of the Article 4(1) Direction and map was sent to the following Welsh Ministers: Eluned Morgan MS (First Minister of Wales), Huw Irranca-Davies MS (Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs) and Rebecca Evans MS (Cabinet Secretary for Economy, Energy and Planning).

Website

The consultation launched on the Authority's website on January 10. The webpage included the following documents:

- Integrated Impact Assessment (Parts 1 and 2)
- Background Paper
- Notice of Article 4 Direction
- Article 4(1) Direction with map
- Officer's Working Protocol
- Advice Note for applicants
- Report of consultation (for consultation undertaken on Camping and Caravan Development 29 May to 20 September 2024)
- Frequently Asked Questions (FAQs)
- Questionnaire

Contact details were provided so that members of the public could respond by post or via email if they preferred to follow this method.

Press and media

The consultation attracted local and national press and media attention.

- BBC headline on 9 February [Camping: Planning rules could force festivals to leave Wales - BBC News](#)
- BBC Breakfast and BBC News at One on 10 February 2025
- BBC Radio Cymru and BBC Radio Wales on 10 February 2025
- Radio Pembrokeshire on 11 February 2025
- Countryfile on March 11 2025 ["To take away the campsite income would be devastating" – landowners and farmers alarmed at Pembrokeshire Coast National Park's pop-up campsite ban | Countryfile.com](#)

- Western Telegraph [Pembrokeshire Coast National Park in camping crackdown | Western Telegraph](#)
- Pembrokeshire Herald [Festival organisers warn of exodus over camping restrictions – The Pembrokeshire Herald](#) and [Farmers angered by Pembrokeshire Coast National Park’s pop-up campsite ban – The Pembrokeshire Herald](#)
- Farmer’s weekly [Plans to restrict Pembrokeshire pop-up camps alarm farmers - Farmers Weekly](#)
- Farmer’s Guide [Farmers angry as Pembrokeshire National Park plans to ban pop-up campsites - Farmers Guide](#)
- BBC Radio 4 on the ‘You and Yours’ programme on 17 March 2025.

3. Summary of consultation responses and officer's response

216 responses were received to the online questionnaire and 14 emails were received. A summary of responses received is provided below, with an officer response.

Questionnaire

The National Park Authority consulted on whether there was support or opposition for introducing the Article 4(1) Direction to remove permitted development rights for 28-day camping and caravan sites and a questionnaire was available online. The questionnaire also asked for views on the impact on the Welsh language, by imposing the Article 4(1) Direction. The questionnaire asked the following questions:

Question 1: Do you support the introduction of an Article 4(1) direction to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days?

Question 2: If you have any additional comments on your answers, or a different preferred option, please add below:

Question 3: Do you support the timescale for the Article 4(1) Direction to come into effect from 1 January 2026?

Question 4: If you have any additional comments on your answers, or a different preferred option, please add below:

Question 5: Which of the following best describes you: I live in Pembrokeshire, I visit Pembrokeshire, I operate a camping or caravan site, prefer not to say, other.

Question 6: If you would like us to contact you about the progress of this consultation, please provide your name and email address below.

Question 7: What, in your opinion, would be the likely effects of the Article 4(1) Direction on the Welsh language? We are particularly interested in any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.

Question 8: Do you think there are opportunities to promote any positive effects?

Question 9: Do you think there are opportunities to mitigate any harmful effects?

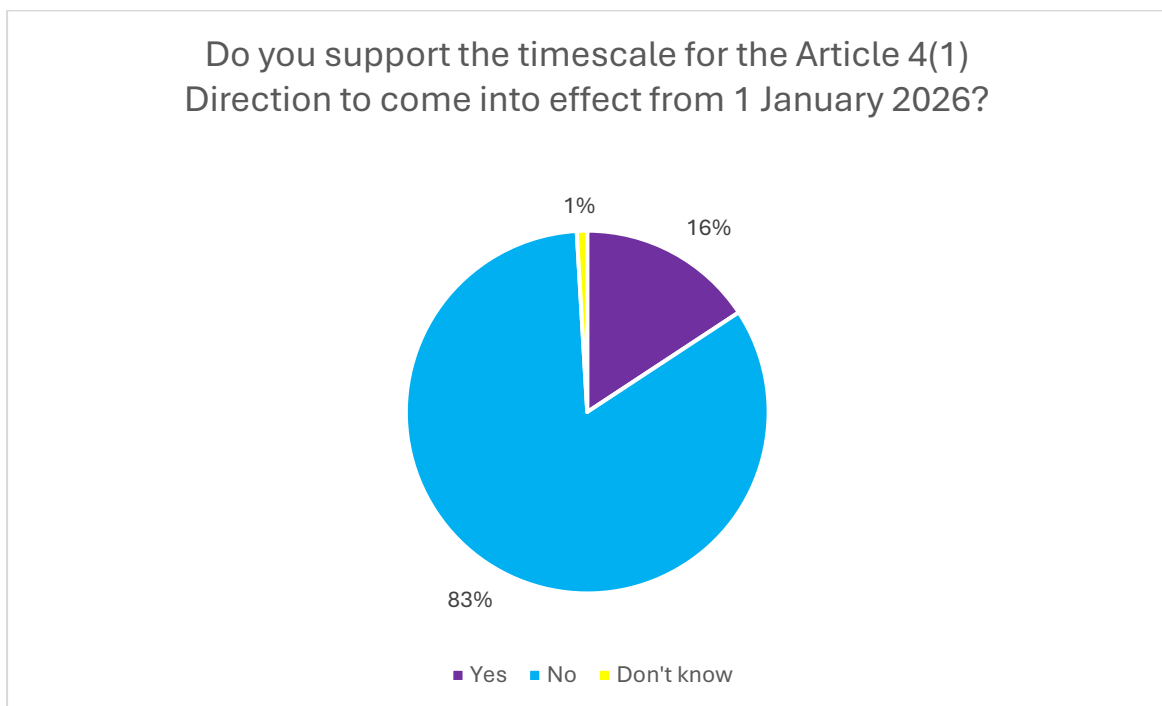
Question 10: In your opinion, could the proposed actions be formulated or changed so as to:

- have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or

- mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English?

Summary of questionnaire responses

Question 1: Do you support the introduction of an Article 4(1) Direction to remove permitted development rights to use land for camping, caravans and/or mobile homes for a period not exceeding 28 days?



The chart above shows the responses to question one received were:

- 180 respondents, 83% answered no and do not support the introduction of the Article 4(1) Direction
- 34 respondents, 16% answered yes and support the introduction of the Article 4(1) Direction
- 2 respondents, 1% answered don't know whether to support the introduction of the Article 4(1) Direction.

Question 2: If you have any additional comments on your answers, or a different preferred option, please add below:

Question two invited comments in response to the answer provided for question one. All themes and opinions have been consolidated in this section.

Answer: No, do not support the introduction of the Article 4(1) Direction.

83% of respondents, equating to 180 respondents answered "no" to question one and do not support the introduction of the Article 4(1) Direction. Key themes emerged in the comments invited under question two as follows:

Economic impacts

In response to question two, numerous comments raised significant concerns about the viability of small businesses due to the implementation of the Article 4(1) Direction. There was also considerable worry about the pressures on agricultural and farming communities. The impact on local economy and tourism and the service industry was a major concern for many respondents. Respondents raised concern and suggested that an economic impact assessment should be conducted before implementing the Article 4(1) Direction.

Social impacts

Concern was raised regarding the social impacts of the proposed Article 4(1) Direction as camping provides an affordable holiday. It was stated that there would be an impact on young people and families from high deprivation areas accessing outdoor opportunities. It was also argued that camping is a more appropriate form of accommodation than Air BnB and holiday homes which take residences out of circulation for local people.

Environmental Impacts

With regard to environmental impacts, camping was viewed as a low impact way to enjoy the countryside and beneficial in promoting a connection and understanding of land, nature and the natural environment. A few responses indicated that 28 days is a short period and would have minimal impact on the landscape. It was stated that licensing and environmental regulations already exist to manage potential issues.

Evidence

Comments were raised by some respondents that there has been a lack of evidence presented in the consultation regarding issues with 28-day campsites. It was suggested that information should be provided on evidence of complaints received, enforcement actions and mapping of compliance.

Consultation arrangements

A small number of respondents stated that the Authority had undertaken a lack of consultation and that the outcome of this consultation had been pre-determined. It was also stated that the previous consultation undertaken during summer 2024 had generated an inadequate level of response.

Impacts on Authority's resources

Some respondents consider a more appropriate option would be a focus on enforcement action and penalties for non-compliant operators, as the proposed measure is unfair for those operators who are complying. A small number of respondents believed that invoking Article 4(1) Direction would increase workloads for planning and enforcement staff of the Park. One respondent held the opinion that invoking Article 4(1) might even encourage unauthorised camping which could add to the National Parks' enforcement. It was suggested the Authority introduce a registration framework for camp sites. A few respondents did not view 28-day campsites as problematic and were unaware of any issues they caused.

Concerns were raised about the costs and time associated with preparing planning applications. Some responses mentioned the increased workload for planners and the burden for the Authority in determining an unknown number of applications and concern regarding the impact on determination of other applications. It was suggested that the proposal may lead to confusion and resentment.

Officer's response

A high level of opposition (83%) was received. This differs to the response received from the consultation on 'Camping and Caravanning Development in the Pembrokeshire Coast National Park' undertaken during the summer 2024 when there was majority support (61.7%) for introducing an Article 4(1) Direction to better manage sites currently operated under 28-day permitted development rights. Officers are aware that significant interest in the consultation was raised by organisers of a large festival in Pembrokeshire.

Of the 180 respondents who oppose the Article 4(1) Direction, 97 respondents provided comments under question 2. Of these 97 comments, 53 related to festivals, events, and the Eisteddfod, rather than the 28-day campsite operations. These concerns are considered to have been addressed by the publication of a clarification note by the Authority on 26 March 2025 (detail is provided below under the heading clarification statement).

Economic impact

The Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. The Authority also recognises that leisure and tourism are a crucial part of the Pembrokeshire economy and is not seeking to overly restrict sites, but ensure they are operating appropriately, respecting the landscape, environment, and consideration is given to their social and economic impacts. The submission of a planning application would enable officers to be made aware of where sites are operating and assess their impact.

The Authority has undertaken an Integrated Impact Assessment (IIA) which considers the potential impacts on the proposed Article 4(1) Direction in Appendix B to NPA Report 47/24 [Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#)

The IIA has been updated following this consultation which will be made available as an appendix to the report to the National Park Authority on 7 May 2025.

Committee Papers - Pembrokeshire Coast National Park

The IIA considers the potential impacts with regard to Equality, Socio-Economic Duty, Welsh Language Standards, Biodiversity Duty and the Well-Being of Future Generations Act. The Appendix to the IIA considers Pros and Cons of permitted development in a table, under the headings Economic, Visitor, Environment and Traffic (pages 37 to 40)

The IIA identifies that there is the potential for some negative economic impact on a limited number of landowners. Concern was raised by the Country Land Owners Association Cymru in response to the consultation undertaken in summer 2024. The IIA considers the economic impact on landowners and identifies that no planning application fee would be required, and no charge would be made for pre application advice but costs may be incurred where a planning consultant is engaged. Costs would also be incurred regarding the time taken to prepare information and make an application.

The Authority has identified a number of measures to reduce and potentially mitigate potential economic disadvantage by:

- Using the Article 4(1) Direction procedure which has a non-immediate effect to provide a 12-month lead in time prior to implementation. The Article 4(1) Direction was agreed on 11 December 2024 and would come into effect on 1 January 2026. This timescale would give land owners and site operators sufficient time to find out the requirements of preparing and submitting a planning application. This timescale also provides sufficient time for applications to be submitted free of charge from 1 January 2026 and determined by planning officers prior to the main summer season in 2026 when 28 day sites would usually operate.
- Officers will provide free pre-application advice for prospective applicants.

- Officers have prepared a working protocol for Planning Officers to fast track applications which are received due to the Article 4(1) Direction for campsites seeking to operate for up to 28 days.
- Officers will consider giving permanent permissions where appropriate.
- Officers anticipate there will be a number of applications received in January 2026. Where additional resources are required to determine applications, enforcement officers and the strategic policy team can provide additional resource.

The Authority considered whether a Regulatory Impact Assessment was required. The process for introducing an Article 4(1) Direction and the process was changed in 2022 and is set out in the Town and Country Planning (General Permitted Development etc) (Amendment)(Wales) Order 2022 - [The Town and Country Planning \(General Permitted Development etc.\) \(Amendment\) \(Wales\) Order 2022 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2022/1251) Article 4 directions must be supported by robust evidence. There is no requirement to produce a Regulatory Impact Assessment.

Social impacts

The Authority notes the concern raised regarding the potential for adverse impacts on lower income families to access affordable holidays. The Authority recognises the positive benefits of camping to provide opportunities to visit and explore the National Park and improve well-being and mental health. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation. There is the possibility that there is a slightly higher cost to some families of staying in authorised sites as this reflects the investment made by the site operators who have invested in toilet facilities with foul drainage.

The Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. A number of operators, such as the Scouts Association which are an exempted organisation which provides an opportunity for young people from all backgrounds to experience camping, will not be impacted by the limited Article 4(1) Direction. Certificated organisations will not be impacted by the introduction of the Article 4(1) Direction and nor will those existing authorised sites who either benefit from a planning permission or a certificate of lawful use.

The Authority wishes to promote a regenerative tourism strategy to ensure visitors to the National Park have a positive experience and a positive impact, to maintain and enhance the natural environment, its communities and nature. The proposed Article

4(1) Direction provides the opportunity to ensure all sites operate to an acceptable social and environmental standard in accordance with the statutory purposes of the National Park.

Environmental impacts

The Authority has identified environmental issues with the operation of some camping and caravan sites:

- **Adverse landscape impacts** (including cumulative impacts) on the National Park which is the highest designation of landscape protection in the UK. The National Park has two statutory purposes:
 - 1) To conserve and enhance the natural beauty, wildlife and cultural heritage of the national Park
 - 2) To promote opportunities for understanding and enjoyment of the special qualities of the National Park by the public

The duty to foster the economic and social well-being of local communities within the National Park is in pursuit of those purposes.

If there is a conflict between the purposes that cannot be resolved, the first purpose should have priority, in line with the Sandford principle.

The Authority has prepared as part of its evidence base for the adopted Local Development Plan an assessment of the landscape capacity of the National Park to accommodate additional caravan or camping provision. This identified that of 26 Landscape Character Areas 11 were at capacity (including 1 which is the Skomer and Skokholm Islands where this is not considered appropriate) and a further 15 had limited capacity. The capacity study did not include temporary sites, only established camping and caravan sites either with permission or those which are certificated sites. Therefore in some areas, with temporary campsites being added in this would result in being beyond capacity.

The above information is considered to justify on landscape grounds the imposition of an Article 4(1) Direction. This would allow the Authority to take a proportional approach considering issues such as individual and cumulative impacts within a particular Landscape Character Area. It would also allow for the Authority to negotiate within individual landowners if required, for example suggesting alternative fields with lower landscape impacts to be considered for use as alternatives if necessary.

- **Inappropriate highway access.** Site 1 in the '28-Day Camping and Caravanning Case Studies in annex 4 to the Background Paper shows a site is operating where the highway access is gained over a Site of Special Scientific Interest (SSSI). SSSIs are a statutory designated site of national importance. National planning policy states planning authorities have a duty "to further the

conservation and enhancement of the features by reason of which a SSSI is of special interest” (paragraph 6.4.24). Planning Policy Wales states, “Development in a SSSI which is not necessary for the management of the site must be avoided...What may be necessary for the management of a site will need to be considered on a case by case basis but it is likely to be limited to activities needed to meet its conservation objectives, including restoration and nature recovery, as well as site management infrastructure, natural flood management and other appropriate nature based solutions.” (paragraph 6.4.25).

- **Impacts on biodiversity, protected species and wildlife disturbances** in remote areas. Site 3 in the case studies annex 4 shows the removal of native vegetation and habitat disturbance. The permitted development rights do not allow the Authority to consider whether for example a site is within a SSSI, or whether crossing a SSSI is needed to achieve access or operating very close to sensitive areas of bird nesting such as auks or seal pupping.
- **Impacts on the historic environment and heritage.** Sites 2 and 4 of the case studies provides details of a temporary campsite situated within the immediate vicinity of a Scheduled Monument.
- **Unregulated foul water discharge** can adversely affect watercourses. The Cleddau and Teifi rivers both have significant problems with regard to phosphate pollution. Guidance from Natural Resources Wales (NRW) requires local planning authorities to assess the potential effect of development in riverine Special Areas of Conservation. The Authority currently has no ability to consider how foul water is disposed of. Permitted development rights do not apply where there are likely significant effects on a Special Area of Conservation but the Authority has no way of monitoring sites other than in response to enforcement complaints.
- **Unregulated and inadequate waste disposal** (see case study, site 1). Images show residual waste and abandoned toilet facilities from the 28 day site operation. Although permanent structures can be enforced they are often small scale and can go unnoticed but nevertheless could result in groundwater contamination and impacts on nearby statutory designated sites. Again, the Authority has no way of monitoring other than in response to complaints.
- **Flood Risk not assessed.** The case study, site 1 is accessed via a single access route which is within flood zone 3. This would impact on emergency evacuation in flood conditions, posing risks to visitors and would restrict emergency access.

Consultation arrangements

The Authority has undertaken considerable engagement and consultation which exceeds statutory requirements. The consultation on Camping and Caravan Development was undertaken during summer 2024 for a period in excess of three

months. The pre-consultation engagement undertaken is detailed in Table 1 and the consultation engagement events is detailed in Table 2 in the Report of Consultations (October 2024) Camping and Caravanning Development in the Pembrokeshire Coast National Park [Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#).

The procedures for undertaking an Article 4(1) Direction are set out in The Town and Country Planning (General Permitted Development etc) (Amendment) (Wales) Order 2022 (schedule 2A). The order requires the Authority to invite representations concerning the direction over a period of at least 21 days. This consultation has been undertaken for a period of six weeks and the advertisement and notification procedures is detailed in section 2 of this report.

Impacts on Authority's resources

The current situation of enforcing against 28 day sites is problematic as there is no requirement for site operators to notify the Authority prior to the operation of sites. To investigate whether sites are operating for 28 days takes significant enforcement resource. The background paper sets out statistics on enforcement action undertaken. Paragraph 4.6 details that between 2018 and 2023, over 60 separate files have been opened in relation to camping and caravanning. In 2022, the percentage of camping and caravan enforcement cases was 9.5% and in 2023 it rose to just over 12%. Additional evidence has been added in annex 5.

Offices anticipate there may be a number of planning applications submitted for 28 day sites in January 2026. As there is no notification procedure for 28 day sites, the Authority is unable to accurately predict the number of applications that may be submitted. Officers have developed an Officer's working protocol to prioritise the determination of 28 day site applications. If additional resources are required, then enforcement officers and planning officers from the Strategic Policy Team may be temporarily utilised.

Overall it is the Officer view that the changes would simplify enforcement investigations and result in a net reduction in officer time on this area of work. Evidence from other areas operating an Article 4(1) in relation to camping, caravans and/or mobile homes (Gower AONB and the New Forest National Park) suggests that application numbers are relatively low, with some operators choosing to either seek permission for a longer period of time or join an exempted organisation (New Forest National Park).

Clarification statement

The consultation responses highlighted a lack of understanding regarding the scope of the Article 4(1) Direction. Concern has been raised regarding the Article 4(1) Direction applying to temporary car parks, weddings, saunas, festivals and other temporary uses of land. The Authority issued a clarification statement that was agreed

by the National Park Authority on 26 March 2025. The clarification statement outlines key details regarding the proposed Article 4(1) Direction. The statement confirms that the proposed restrictions will apply only to 28-day camping, caravan, and mobile home sites. Other temporary 28-day uses – including triathlons, filming, temporary car parks, and mobile saunas – will not be affected and ancillary camping associated with those activities will not be prevented. Additionally, exempted certificate sites and bodies operating under exemption certificates will continue to operate as usual.

The statement also clarifies that camping and caravan use connected to other permitted temporary events, such as weddings, festivals, filming, or agricultural shows, will not require additional planning permission. In assessing whether camping is ancillary to an event, the Authority will consider factors such as licensing, advertising, site usage proportions, and event duration.

To assist landowners and site operators, the Authority will offer a free pre-application service for those seeking to submit planning applications under the Article 4(1) Direction. The clarification note also provides guidance on the information required for planning applications.

[Answer: Yes, support the introduction of the Article 4\(1\) Direction.](#)

16% of respondents, equating to 34 respondents answered "yes" to the first question and supported the introduction of the Article 4(1) Direction. A large number expressed support for stronger regulation and enforcement regarding camping and caravanning, noting a number of sites operate in excess of 28 days and some sites are constructing permanent structures without planning permission, which they find unsightly.

Some comments expressed worries about the additional strain on local infrastructure, increased traffic, and the impact on local residents. Others mentioned that these campsites can be detrimental to the landscape and visually unappealing. One respondent felt there should be records of each campsite and annual site visits should be undertaken. Some respondents felt that all campsites should adhere to the same rules, as the unregulated nature of 28-day sites creates an uneven playing field and threatens the sustainability of regulated campsites. Two respondents considered that the Article 4(1) Direction should be expanded to include exempted organisations. Respondents felt these campsites detract from the National Park's natural beauty and contribute to additional waste and noise nuisance. One comment highlighted concerns about the lack of regulation and potential safety issues at 28-day sites, which place strain on the Park's infrastructure and increases road traffic and that there are enough campsites in the county.

Officer's response

The issues raised by respondents with regard to operations exceeding 28 days, impacts on the National Park's landscape and beauty, waste, noise nuisance for neighbouring properties and traffic congestion are issues highlighted by officers in the background paper. These issues prompted the need for the Article 4(1) Direction.

[Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#)

The Authority's consultation on options to control camping and caravan development in 2024 considered the withdrawal of permitted development rights for exempted organisations. This earlier consultation received an equal level of opposition and support (40.2%) to an Article 4(1) Direction for sites currently operated by Exemption Organisations but with a greater strength of feeling expressed regarding opposition to the proposal. At the National Park Authority meeting on agreed on 11 December 2024, Members approved for officers to prepare a voluntary Code of Conduct /Working Protocol for Exempted Organisations.

Answer: Don't know whether to support the introduction of the Article 4(1) Direction

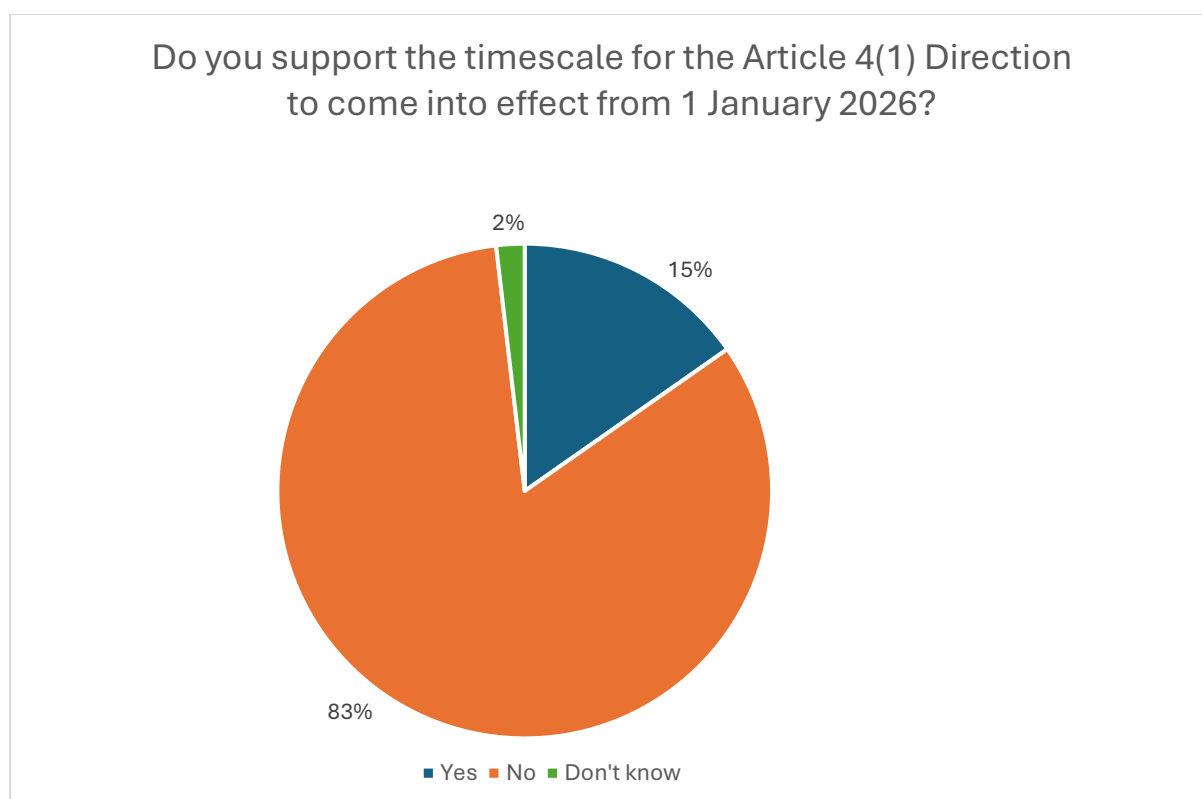
1% of respondents, equating to two respondents overall answered "Don't know" to the first question as to whether they support the introduction of an Article 4(1) Direction. One respondent had concerns about the acceptability of their own 28 day campsite gaining planning permission if the Article 4(1) Direction came into effect. They expressed frustration that the "few 'rouge' (sic) campsites" has led to this decision when others are operating in accordance with the rules. They also expressed concern that taking away 28 day sites would reduce affordable holidays for families. Another respondent raised concerns about viability of festivals as a result of implementing Article 4(1).

Officer's response

The Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. The Authority's clarification note published by the Authority on 26 March makes it clear that free pre-application advice will be provided in relation to any businesses who are unclear on how the Article 4(1) Direction will affect them, Officers are happy to engage in early discussions on any sites ahead of any formal introduction of Article 4(1).

The clarification note also explains that camping and caravan use connected to other permitted temporary events, such as weddings, festivals, filming, or agricultural shows, will not require additional planning permission. In assessing whether camping is ancillary to an event, the Authority will consider factors such as licensing, advertising, site usage proportions, and event duration.

Question 3: Do you support the timescale for the Article 4(1) Direction to come into effect from 1 January 2026?



The chart above shows the responses received in relation to question three were:

- 179 respondents, 83% answered no and do not support the timescale for the Article 4(1) Direction to come into effect from 1 January 2026
- 33 respondents, 16% answered yes and support the timescale for the Article 4(1) Direction to come into effect from 1 January 2026
- 4 respondents, 1% answered don't know whether to support the timescale for the Article 4(1) Direction to come into effect from 1 January 2026.

Question 4: If you have any additional comments on your answers, or a different preferred option, please add below:

Question four invited comments in response to the answer provided for question three regarding the timescale for implementation of the Article 4(1) Direction. The responses received have been summarised in this section.

Answer: No, do not support the timescale for the Article 4(1) Direction to come into effect from 1 January 2026.

179 respondents, equating to 83% of respondents answered 'no' to question three and did not support the proposed timescale for the Article 4(1) Direction to come into effect on 1 January 2026. A total of 61 comments were provided for this question, however only 16 comments related to question three and the proposed timescale. The majority of comments made were in relation to question one, where themes and opinions have already been documented in this report and a few comments were in relation to question five. The majority opposed the proposed introduction of the Article 4(1) Direction.

One respondent suggested that Article 4(1) should be implemented starting from July 2025. Several responses indicated that more time and research were needed to better understand the reasons for initiating the Article 4(1) Direction. Some respondents felt that setting a final implementation date implied that the Park had already decided to invoke Article 4(1) before the public consultation. Others suggested that a longer consultation period was necessary to fully understand the impacts of Article 4(1), and therefore a later initiation date was required. Additionally, some respondents felt that there was insufficient time for landowners and businesses to make the necessary adjustments to avoid disrupting their operations.

Officer's response

The Authority has provided a 12-month lead in time prior to the implementation date to give landowners and site operators sufficient time to find out about the requirements of preparing and submitting a planning application. This timescale also provides sufficient time for applications to be submitted free of charge from 1 January 2026 and determined by planning officers prior to the main summer season when the majority of 28 day sites would operate. Planning applications will also become free from 1 January 2026 and therefore officers consider that pushing back the date would have a negative impact on landowners as it would give less time to submit a planning application free of charge.

The Officer's Report to the National Park Authority on 1 May 2024 included a proposed timetable for progression of an Article 4(1) Direction. At this time, the Article 4(1) Direction was proposed to take effect on 23 October 2025: [Report-14-24-Article-4.pdf](#)

The date for implementation was amended from October 2025 to January 2026 to allow enable sufficient time for officers to consider the consultation responses received during summer 2024 and also give 12 months' notice prior to implementation of the Article 4 Direction.

The report to National Park Authority on 11 December 2024 sets out a proposed timescale for the Article 4(1) Direction to come into effect from 1 January 2026.

[Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#)

The Article 4(1) Direction was agreed on 11 December 2024. The date for the Article 4(1) Direction to come into effect is specified in the Article 4(1) Direction that was signed and sealed on 11 December 2024. The public Notice and Article 4(1) Direction was made available to view on the Authority's website:

[Article 4\(1\) Direction Consultation Page - Pembrokeshire Coast National Park](#)

[Microsoft Word - RHYBUDD CYHOEDDUS - Dwyieithog.docx](#)

[Article-4-Direction-signed-and-sealed-11-12-2024.pdf](#)

Answer: Yes, support the timescale for the Article 4(1) Direction to come into effect

33 respondents, equating to 15% of total respondents answered 'yes' to the third question and supported the timescale for the Article 4(1) Direction to come into effect.

Four comments were left in this section, including one comment addressing question one which has already been captured. Two respondents suggested that Article 4(1) should be implemented before January 1, 2026, while one respondent felt the timeline is sufficient, provided there has been thorough engagement with site owners.

Officer's response

Officers consider the proposed timescale is appropriate and provides 12 months' notice for site operators to be aware of the proposal and give landowners and site operators sufficient time to find out about the requirements of preparing and submitting a planning application.

Answer: Don't Know whether to support the timescale for the Article 4(1) Direction to come into effect

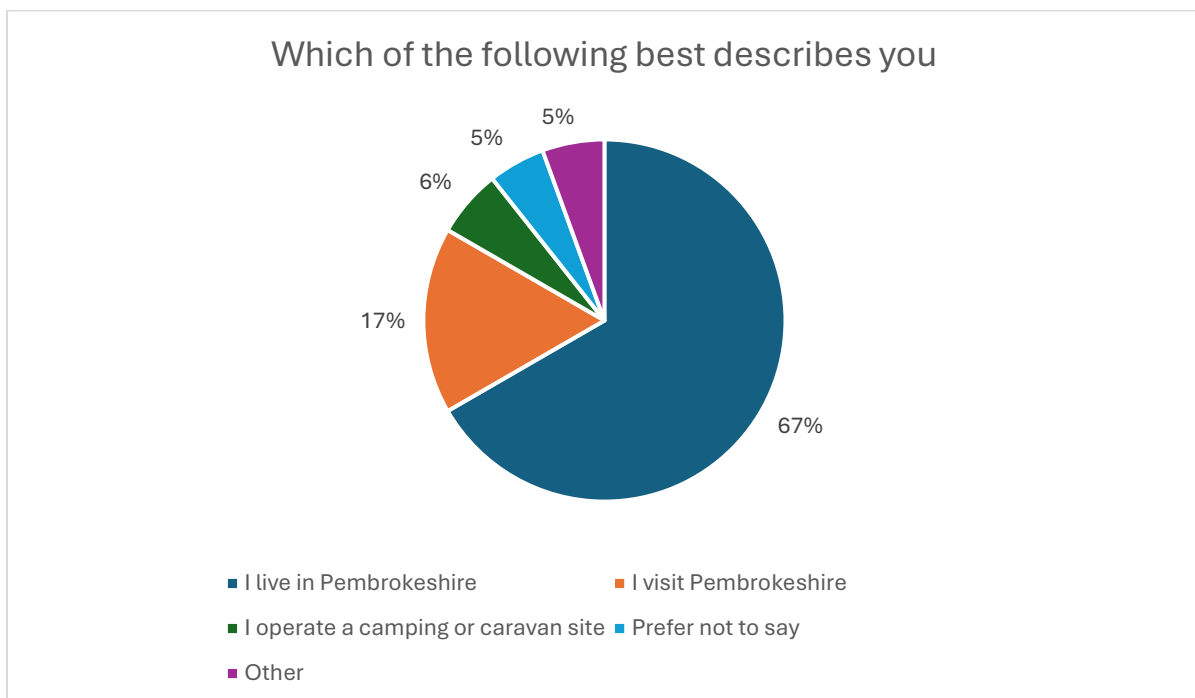
Four respondents, equating to 2% of respondents selected 'don't know' to question three. One respondent mentioned that events and festivals will be planning for the 2026 season and will need support to implement the necessary changes.

Officer's response

Officers consider the proposed timescale is appropriate to provide adequate time to plan ahead for 2026. With regard to planned events and festivals, the Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025. The clarification statement outlines key details regarding the proposed Article 4(1) Direction. The statement confirms that the proposed restrictions will apply only to 28-day camping, caravan, and mobile home sites. The statement also clarifies that

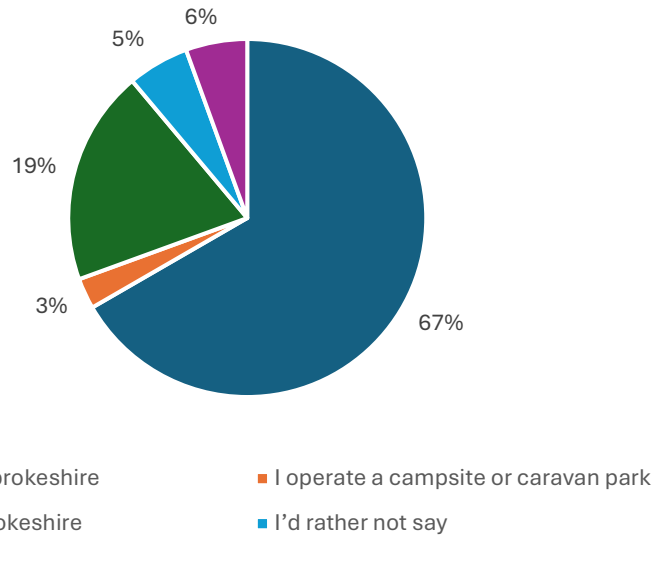
camping and caravan use connected to other permitted temporary events, such as weddings, festivals, filming, or agricultural shows, will not necessarily require additional planning permission provided it is ancillary to the main use. In assessing whether camping is ancillary to an event, the Authority will consider factors such as licensing, advertising, site usage proportions, and event duration. To assist landowners and site operators, the Authority will offer a free pre-application service for those seeking to submit planning applications under the Article 4(1) Direction. It is suggested that applicants contact the Authority to confirm whether permission will be required for the event.

Question 5: Which of the following best describes you?



- 67% of respondents, equating to 144 individuals, identified themselves as residents of Pembrokeshire. For question one, two respondents selected 'Don't know,' 22 supported the implementation of Article 4(1), and 120 opposed it.
- 17% of respondents indicated that they visit Pembrokeshire, this equates to 36 respondents.
- 6% of respondents, totalling 13 individuals, identified themselves as operators of campsites or caravan parks. Among them, eight supported the implementation of the Article 4(1) Direction, while five opposed it.
- 5% of respondents selected 'prefer not to say' to represent themselves, equating to 11 respondents in total.
- 5% of respondents categorised themselves as 'other' totalling of 12 respondents.

Respondents who oppose, broken down by 5 'Which of the following best describes you'.

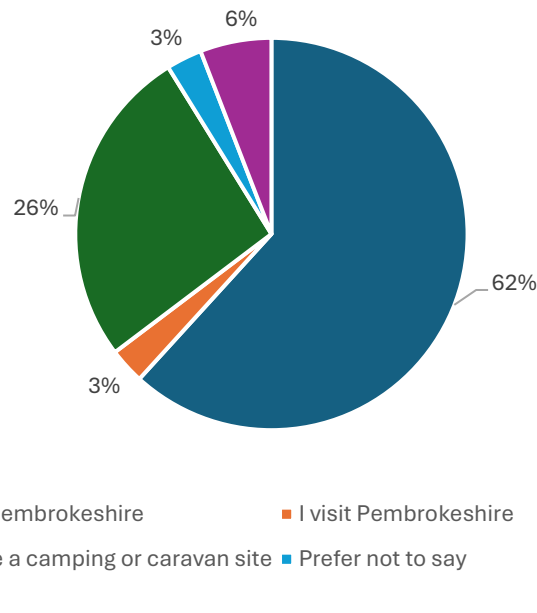


The chart above categorises the opposers of the questionnaire from question 1, based on question 5 which is 'Which of the following best describes you'. The chart shows of the 180 respondents who support the Article 4(1) Direction:

- 67% live in Pembrokeshire
- 3% operate a camping or caravan site
- 19% visit Pembrokeshire
- 5% prefer not to say
- 6% other

This shows there is a mix of support from both residents and those who visit Pembrokeshire.

Respondents who support, broken down by 5 'Which of the following best describes you'



The chart above categorises the supporters of the questionnaire from question 1, based on question 5 which is 'Which of the following best describes you'. The chart shows of the 34 respondents who support the Article 4(1) Direction:

- 62% live in Pembrokeshire
- 26% operate a camping or caravan site
- 3% visit Pembrokeshire
- 3% prefer not to say
- 6% other

This shows there is a mix of support from both residents and operators of camping and caravan sites.

Question 6: If you would like us to contact you about the progress of this consultation, please provide your name and email address below.

Officer's analysis

The analysis of the questionnaire highlighted to officers there was significant concern raised in relation to the operation of festivals. Further analysis of the responses received highlighted multiple responses had been received from the same respondent. From the comments received, three email responses and five questionnaire responses

were affiliated with the same event organiser, with some multiple responses coming from a single respondent. Additionally, three responses, including one email, were received from the same company operating within campsites. One individual submitted both an email and a questionnaire response. Representatives from Pitchup.com provided one questionnaire response and one email response, the latter serving as an extension due to word count limitations. This suggests that the questionnaire permitted multiple submissions from the same individual, potentially distorting the results. The Park values this as a learning opportunity and will implement more robust research methods in future consultations to ensure clarity of data.

Upon analysing the data, it was evident that at least 14 respondents who operate campsites have indicated 'I live in Pembrokeshire.' Among them, 12 oppose the Article 4(1) Direction, one supports Article 4(1), and one selected 'Don't know' for question one. This gives the impression that responses have been received from residents rather than campsite operators. The Park will use this opportunity for learning and ensure that it presents clearer questions in later consultations.

[Question 7: What, in your opinion, would be the likely effects of the Article 4 Direction on the Welsh language? We are particularly interested in any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.](#)

Not all respondents answered this question. A total of 140 comments were left by respondents for question seven. Among these, 40 comments were irrelevant and did not answer question seven. 38 comments indicated that there would be no impact. One comment received indicated there would be a positive impact. 55 comments received indicated there would be a negative impact. 6 respondents were either unsure of the impact or how to answer question seven.

It was suggested that we need to find ways to make the Welsh language accessible and engaging and give visitors a positive impression of the language.

Seven responses highlighted concerns about the effects on Welsh events, in particular the Eisteddfod which is being held in Pembrokeshire in 2026. It was stated that restrictions on landowners offering temporary campsites would impact negatively on young and low income families wanting to attend the Eisteddfod. A number of respondents raised concern about the reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture. A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4 Direction, thereby having a negative impact on local families and Welsh speaking communities. It was also commented by one respondent that the

requirement for a planning application may cause stress and impact the mental well-being of rural business owners. One comment criticised the authority for not conducting a full Welsh Language Impact Assessment and that it needs to be demonstrated how negative impacts will be mitigated.

Officer's response

With regard to the impact on Welsh events, such as the Eisteddfod, the Authority published a clarification note on 26 March 2025. The statement confirms that the proposed restrictions will apply only to 28-day camping, caravan, and mobile home sites. The statement clarifies that camping and caravan use connected to other permitted temporary events, such as weddings, festivals, filming, or agricultural shows, will not require additional planning permission. In assessing whether camping is ancillary to an event, the Authority will consider factors such as licensing, advertising, site usage proportions, and event duration.

To assist landowners and site operators, the Authority will offer a free pre-application service for those seeking to submit planning applications under the Article 4(1) Direction. The clarification note also provides guidance on the information required for planning applications.

The Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.

Concern was also raised that landowners or young people who may leave the area due to the inability to operate their businesses. Officers have liaised with other authorities who operate an Article 4(1) Direction. In the Gower, an Article 4(1) Direction has been in operation since 1977 and officers receive a low level of applications for the operation of 28 day sites. For example, two applications were made in the Gower for 28 day sites during the last year, of which one was refused.

The requirement for the submission of a planning application is considered by Officers to have a positive impact on the Welsh language as all planning applications must be determined in accordance with the development plan which comprises of Future Wales and the adopted Local Development Plan 2. The adopted LDP 2 has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas' (Policy

13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Proposals which would result in an unacceptable adverse effect on the Welsh Language would not be permitted under Policy 13.

A Welsh Language Impact Assessment has been undertaken for the Article 4(1) Direction and forms part of the Integrated Impact Assessment (IIA) (Stage 2 assessment can be viewed here: [Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#)) The stage 3 assessment is being undertaken to take account of the responses from this consultation and will be published online alongside the report to the National Park Authority meeting.

Question 8: Do you think that there are opportunities to promote any positive effects?

Not all respondents answered this question. Not all respondents were aware that this question related to the Welsh language and a number of comments were received that related to the principle of the Article 4(1) Direction.

Several responses highlighted the presence of bilingual signage and communication at campsites would be a positive measure and it was suggested the National Park should offer translation services.

Out of the 121 responses received for this question, 62 suggested there were no opportunities to promote positive effects. 32 comments received were irrelevant to question eight and did not answer the question. 21 comments received indicated there are opportunities to promote positive effects. 6 respondents advised they were unsure of there are any opportunities to promote positive effects or were unsure of how to answer question eight.

Multiple comments suggested the importance of Welsh festivals, while a few respondents mentioned employing Welsh speakers and people from the National Park area to work at campsites. A few comments expressed concerns that reducing campsites would decrease tourism and opportunities to share the Welsh language with visitors. It was suggested by one respondent that the National Park Authority should:

- Create a bilingual, fair registration system instead of a restrictive planning process
- Provide financial support to Welsh-speaking businesses affected by the Article 4(1) Direction

- Ensure that temporary accommodation remains available for Welsh language events

Officer's response

Officers will make it clear in future consultations that this question relates specifically to the Welsh language. Officers observe that a number of respondents commented on the potential for bilingual signage and this could be required for applications in Welsh Language Sensitive Areas.

A number of comments were restated with regard to the potential negative impacts of the Article 4(1) Direction on the economy and in Welsh speaking communities which is responded to in the Officer's response for question 7. In response to the suggestion for a bilingual registration system, the National Park Authority does not have the powers to create a registration system and this would be required by a change to legislation by the Welsh Government. The Authority is not required to provide financial support to businesses affected by the Article 4(1) Direction, although in some limited circumstances it is required to pay compensation. In response to the provision of temporary sites for Welsh language events, the Authority has published a clarification statement. See the officer's response under question two, under the title 'clarification statement'.

Question 9: Do you think that there are opportunities to mitigate any adverse effects?

Not all respondents answered this question. Not all respondents were aware that this question related to the Welsh language. 109 comments were received by respondents for this question. 54 comments received were irrelevant to question nine and did not answer the question. 29 comments received indicated there are no opportunities to mitigate harmful effects. 19 comments received suggested there are opportunities to mitigate harmful effects, and 5 respondents indicated they were either unsure of how to answer the question or whether there are opportunities to mitigate harmful effects. Finally, two respondents advised there are no adverse effects from Article 4(1) that would require mitigation.

Bilingual signage on all campsites was mentioned by several respondents. Multiple respondents were unsure how to answer the question, and many were uncertain about the relevance of the question. Additionally, it was commented that the Authority should conduct a full Welsh language Impact Assessment to assess the impact of Article 4(1) Direction on Welsh-speaking communities to:

- Examine the economic impact on Welsh-speaking landowners
- Assess the effect on Welsh-language events and festivals

- Determine whether the policy risks treating the Welsh language less favourably than English

It was also suggested by three respondents that financial support should be introduced for Welsh-speaking landowners affected by the Article 4(1) Direction to compensate for lost income and that the National Park should work with Welsh Government to create a grant or financial support scheme to help businesses transition to alternative income sources without forcing them to relocate.

Officer's response

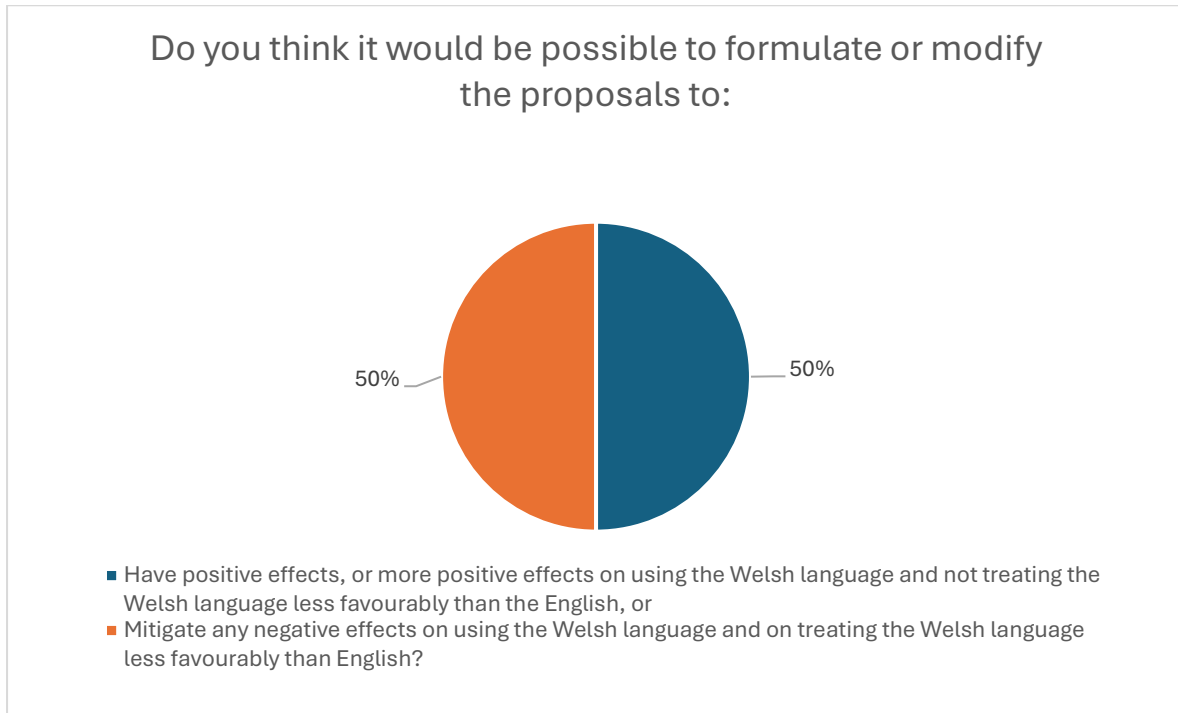
The submission of a planning application would enable the Authority to assess the impacts of proposals in Welsh Language Sensitive Areas, where the site measures more than 1 hectare. In accordance with the adopted Local Development Plan 2, policy 13 Development in Welsh Language-Sensitive Areas requires a Language Impact Assessment to be prepared, setting out the measures to be taken to protect, promote and enhance the Welsh language. Suitable mitigation measures may include bilingual signage or other measures which would help to promote Welsh language as an intrinsic element of design or site layout, or funding for Welsh language and cultural awareness initiatives.

The Welsh Language Impact Assessment has been undertaken and forms part of the Integrated Impact Assessment (IIA).

In response to the provision of economic impact on Welsh speaking landowners, see officer's response under question two, under the sub heading 'economic impact. With regard to the effect on Welsh language events and festivals, the Authority has published a clarification statement. See the officer's response under question two, under the title 'clarification statement'.

Question 10: In your opinion, could the proposed actions be formulated or changed so as to:

have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or
mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English?



66 respondents completed this question, with 50% selecting option one, and 50% selecting option two.

Officer's response

No further comments were provided in response question 10. Potential mitigation measures were identified in the previous questions regarding bilingual signage and information.

4: Email responses

14 consultation responses were received by email from four organisations and 10 members of the public. These responses are detailed below and an officer response is provided.

Pitch up

Pitchup.com believes considering the implementation of an Article 4(1) Direction is premature due to potential changes in consideration by the Welsh Government which will enable campsites to operate for 60 days. They believe the new regime in England addresses many objections and manages camping activities without affecting the area's character.

Concerns are raised about the impact on Pembrokeshire's tourism sector, particularly for agricultural communities and campsite operators who rely on income from temporary campsites. The move by Pembrokeshire Coast National Park Authority is seen as out of step with national trends, potentially undermining confidence and choice for those struggling to make ends meet. Testimonials from local operators highlight the importance of campsite income for their livelihoods and the positive impact on the community.

Pitchup.com emphasises the high quality of campsites in Pembrokeshire and the positive reviews from campers. They argue that temporary campsites help reduce pressure on residential housing and support local businesses. Pitchup believe that the Park has not provided evidence of exceptional circumstances or assessed the economic impact of removing permitted development rights, which could negatively affect local pubs, shops, and restaurants.

Many temporary campsites attract more visitors during their short season compared to small established sites. With fewer on-site facilities and visitors typically staying in tents, local businesses benefit more from visitor spending. Additionally, lower prices at temporary campsites leave visitors with more money to spend off-site. Removing permitted development rights prevents prospective campsite operators from testing demand without the costs and delays of a planning application.

Officer's Response

The Welsh Government has issued a consultation on 8 April 2025 to extend the permitted development rights from 28 days to 60 days. This is a consultation and officers will be providing a response, highlighting issues experienced in the National Park with regard to temporary camping and caravan sites.

Officers note the concerns raised with regard to the economic impacts and refer to the officer response provided to question two in this report.

The Authority has provided case studies in the background paper of 28 day sites in the National Park which are not operating in accordance with permitted development rights and are having harmful environmental and social impacts.

Port of Milford Haven

The Port of Milford Haven welcomes the opportunity to contribute to Pembrokeshire Coast National Park's consultation on the proposed Article 4(1) Direction. They express concerns that the policy could have unintended consequences for Pembrokeshire's tourism sector, potentially stifling growth and innovation. The Port highlights its diversification into the Hospitality and Tourism sector, emphasising the importance of a thriving tourism economy.

The Port respects the legal responsibility of Pembrokeshire Coast National Park to protect the Park but believes the proposed Article 4(1) Direction could negatively impact the local economy, particularly the events sector. They request further research into temporary camping policies in other UK regions and suggest a more targeted approach to avoid disadvantaging rural communities and established campsite operators.

The Port of Milford Haven makes several recommendations, including clear communication with current permitted development site operators, support for established operators to achieve planning permission, encouragement for event organisers, alignment with policies in other regions, and increased enforcement on offending operators.

Officer's Response

Officers note the concerns raised with regard to the economic impacts and refer to the response provided to question two in this report. The Authority agreed and issued a clarification statement that was agreed by the National Park Authority on 26 March 2025. Further information is provided in the officer response provided in response to question two.

Mathry Community Council

Mathry Community Council advised they do not support the Article 4(1) Direction, but did not provide any further information for their reasoning.

Officer's Response

Response is noted.

Visit Pembrokeshire

Visit Pembrokeshire acknowledges the rationale behind PCNPA's proposed Article 4(1) Direction to control unregulated development and protect the National Park's landscape. However, significant concerns have been raised by strategic partners, local businesses, stakeholders, and community organisations.

One key objective of Pembrokeshire's 2024-28 Destination Management plan is to extend the tourist season and support a year-round events calendar. Visit Pembrokeshire advise events rely on temporary camping facilities, which would require planning permission under the new proposals. Visit Pembrokeshire feel this process is often complex and costly, potentially jeopardising the viability of smaller events.

Boat operators in the north of the county, who benefit from temporary seasonal parking, fear their businesses may become unviable due to the Article 4(1) Direction. The impact on the local economy must be carefully considered, seeking compromises that protect the landscape while allowing responsible business operations.

The proposed Article 4(1) Direction applies only to the National Park area, creating an inconsistent approach across the county and unequal opportunities. Visit Pembrokeshire believes the current proposals could have unintended negative consequences on the economic ecosystem and the collective ambition to develop sustainable tourism. They urge PCNPA to consider these concerns when finalising the proposals.

Officer's Response

A number of mitigation measures have been identified to help and guide prospective applicants through the planning application process. A free pre-application advice service will be provided for all applicants requiring permission for up to 28 day sites for camping, caravan and mobile homes. The Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025 detailing the types of development that are not covered by the Article 4(1) Direction. The Article 4(1) Direction does not relate to parking. Further information is provided in the officer response provided in response to question two in this report.

With regard to an inconsistent approach across the County, concern was raised by Pembrokeshire County Council during the previous consultation that introducing an Article 4(1) Direction in the National Park only might result in landowners using other permitted development rights instead, there could be some small displacement of sites outside of the National Park where the site owner has land options available outside

of the National Park, however these would be limited to those specific circumstances as land cannot be moved. There is also potential for those currently operating 28-day sites within the National Park to sign up to Exemption Organisations. The National Park Authority approved on 11 December 2024 for officers to prepare a voluntary Code of Conduct / Working Protocol for Exempted Organisations.

Respondent 1

The submission argues that the Authority's decision to introduce the Article 4(1) Direction lacks firm legal grounding and exposes it to potential legal challenges. It claims the decision goes against national policy in both Wales and England and that the Authority has not adequately considered the communities affected by the direction.

The respondent suggests there is a lack of evidence and understanding of the social and economic impacts on families and businesses within the National Park. It criticises the Authority for not conducting an impact assessment and for failing to foresee the economic damage the direction could cause.

The respondent emphasises the need for the Authority to have all the facts and evidence to make balanced decisions. The respondent states they value the work of the National Park and calls for closer collaboration to help the Authority fulfil its duties effectively.

Officer's Response

Welsh Government issued a consultation on 8 April 2025 to extend the permitted development rights from 28 days to 60 days. This is a consultation document and officers will be providing a response to the consultation, particularly highlighting the issues experienced in the National Park with regard to temporary camping and caravan sites.

Officers note the concerns raised with regard to the economic and social impacts and refer to the officer response provided in response to question two.

The Authority has undertaken an Integrated Impact Assessment (IIA) which considers the potential impacts on the proposed Article 4(1) Direction in Appendix B to NPA Report 47/24 [Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#)

The IIA has been updated following this consultation which will be made available as an appendix to the report to the National Park Authority on 7 May 2025.

Committee Papers - Pembrokeshire Coast National Park

Respondent 2

The respondent argues that national policy allows Article 4 directions only in exceptional circumstances with a real and specific threat, which the NPA has not demonstrated.

The direction applies to the entire national park without identifying areas where temporary camping would cause harm. Permitted development rights for short-term use have benefits that outweigh potential harms, and the NPA has not provided evidence of real threats from lawful camping.

The proposal would reduce camping in the park, negatively impacting young people, those on modest incomes, and the local economy. The planning application process is costly and time-consuming, making temporary campsites unviable. This approach would also increase the Park's workload without additional funding.

The Park's direction undermines national policy and fails to consider the economic impact on the Park. The Article 4(1) Direction should be revoked as it does not meet the necessary criteria and adversely affects various stakeholders.

Officer's Response

Evidence for the proposal is provided in the Background paper and officers have added evidence from four case studies as an appendix to the background paper. Officers note the concerns raised with regard to the economic and social impacts and refer to the officer response provided in response to question two in this report.

Respondent 3

The respondent objects to the proposed Article 4(1) Direction to restrict permitted development rights for temporary camping and caravanning within the Pembrokeshire Coast National Park. They argue that the direction fails to meet national policy requirements, which state it should only be used in exceptional circumstances with a real and specific threat. The respondent suggests that the consultation documents lack concrete evidence of harm and appear to be a predetermined decision rather than genuine engagement.

The respondent believes that the engagement around the consultation led by the Park has been inadequate. They express concerns about the economic impact on local businesses, agricultural communities, and tourism operators, noting that PCNPA has not conducted a detailed economic assessment. The planning application process is seen as burdensome, with no guarantee of success, creating uncertainty and delays for landowners.

Additionally, the respondent points out that PCNPA has not considered the impact on disadvantaged groups who rely on affordable camping, such as youth groups and

lower-income families. They argue that the justification for the direction, aimed at enforcing against unauthorised camping, is flawed and should be addressed through proactive enforcement instead.

The respondent also raises concerns about the lack of clarity on how the direction will impact temporary events, suggesting that the policy has not been properly planned or engaged with stakeholders. They conclude that the Article 4(1) Direction is fundamentally flawed, lacks a clear evidence base, and should be revoked.

Officer's response

Officers note the concerns raised with regard to the economic and social impacts and refer to the officer response provided in response to question two. This section also provides information on consultation undertaken and the publication of a clarification statement by the Authority on 26 March 2025.

The Authority has undertaken an Integrated Impact Assessment (IIA) which considers the potential impacts on the proposed Article 4(1) Direction in Appendix B to NPA Report 47/24 [Report-47-24-Caravan-and-Camping-Consultation-Update.pdf](#)

The IIA has been updated following this consultation which will be made available as an appendix to the report to the National Park Authority on 7 May 2025.

Committee Papers - Pembrokeshire Coast National Park

Respondent 4

The respondent raises concerns regarding the impact of the Article 4(1) Direction on festivals. With 55 years of farming experience within the Park and a commitment to public access, the respondent endorses the case made for festivals.

Criticisms of the measure include inadequate consultation, minimal response, and lack of evidence. As the enabler of a significant festival, they emphasise the festival's long-term connection to the site and its role in serving National Park purposes by offering recreational access.

The respondent points out the lack of consideration for the measure's impact on special events, leading to potential damage to festivals. The festival relies on camping on an adjacent site for less than a week, which does not affect farming production. The event is well planned with professional camping sites, supported by Welsh Government and Visit Wales, and enjoyed by National Park staff.

The respondent mentions the damaging effect of the measure on other long-term activities at the site, including its designation as a candidate site for mixed tourism and leisure, its historical use for events for Scout and outdoor learning activities.

The respondent supports the National Park's essential purposes and enhances them through sustainable farming, woodland improvement, public enjoyment, and community engagement.

Officer's Response

Officers note the concerns raised with regard to the operation of festivals and the Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025 and refer to the officer response provided in response to question two in this report. Detailed information on the engagement and consultation procedures undertaken by the Authority is also provided in response to question two.

Respondent 5

The respondent emphasises that temporary camping structures are not permanent, generally unobtrusive, and provide vital income for farmers and smallholders who maintain the national parks. They argue that the proposal will harm many small rural businesses already struggling with increasing regulations. The respondent urges the Authority to abandon the idea to prevent further harm to rural workers.

Officer's response

Officers note the concerns raised with regard to the economic, social and environmental impacts and refer to the officer response provided in response to question two in this report.

Respondent 6

The respondent, objects to the proposed Article 4(1) Direction. They highlight that an event organised by them each year, held within the National Park for over 30 years, would be severely impacted by the requirement for planning consent. The camp has operated without major conflicts or complaints and complies with its TENS license conditions.

The respondent notes that the event is recovering from the financial strain of COVID-19 lockdowns, and the new planning consent requirement would add further expense and effort. As a not-for-profit group offering affordable activities, any increase in operating costs would burden families who can least afford it.

The event incorporates Welsh language and culture, and the respondent argues that the reasons for the proposed change do not apply to their activities. They have always complied with permitted development time limits and license conditions, maintaining a curfew on loud activities to respect nearby residents.

The respondent appreciates the planning authority's responsibility to maintain the park's peaceful environment but believes the blanket removal of the 28-day rule is unnecessary. They support action against abuses of the rule but argue that many farms benefit from it without causing problems.

Officer's response

Officers note the concerns raised with regard to the operation of the event. The Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025. Further information is provided in the officer response provided in response to question two in this report. Officers would encourage the respondent to submit a pre-application enquiry to the Authority and officers will confirm in writing whether planning permission would be required for the event. Officers also note the concerns raised with regard to the economic impacts and please refer to the officer response provided in response to question two.

Respondent 7

The respondent opposes the proposed Article 4(1) Direction to remove permitted development rights for campsites operating up to 28 days. They argue that the measure is ill-conceived, not evidence-based, disproportionate, and damaging to rural businesses.

The respondent feels that the Authority's consultation lacks concrete evidence of harm caused by the current system, relying instead on potential issues. They believe the measure addresses enforcement issues by penalising all operators rather than targeting those who are in breach of regulation.

The respondent feels that the consultation is predetermined, with minimal public engagement and support. The respondent notes that the rural economy relies on small campsites for income, and the proposed restriction would make this economic opportunity difficult due to uncertain planning consent.

The respondent also points out the wide-ranging impact of the measure, affecting activities such as children camping, weddings, and multi-day events. They argue that the planning application process is burdensome and costly and could increase enforcement workload.

The respondent suggests that festivals would be particularly affected, becoming unviable for investment and may have to potentially close or relocate.

The respondent suggests that the issues could be addressed by applying Article 4 restrictions only to campsites in breach of rules and regulation, which would be targeted, evidence-based, and proportionate.

Officer's response

Officers note the concerns raised with regard to the economic impacts and refer to the officer response provided in response to question two in this report. This section also provides information on consultation undertaken. Evidence for the proposal is provided in the Background paper and officers have added evidence from four case studies as an appendix to the background paper. The Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025. Further information is provided in the officer response provided in response to question two.

Respondent 8

The respondent highlights the importance of affordable camping holidays for many families in financially difficult times. They emphasise that small coastal villages in Pembrokeshire rely on tourism as their main industry. Revenue generated by campers during the summer season supports local businesses.

The respondent believes camping facilities should be available from the start of the school Easter holidays to the end of the half-term school holidays in October, leaving fields empty for five months. They see no benefit in reducing the camping season to four weeks, warning that it could lead to the closure of small businesses and redundancy for local people.

Officer's response

Officers also note the concerns raised with regard to the economic impacts and please refer to the officer response provided in response to question two in this report.

Respondent 9

The respondent expressed strong support for the proposal to mandate planning permission for all camping and caravanning sites, regardless of their duration. They highlighted that numerous landowners currently bypass existing regulations by permitting campers on their fields for periods exceeding 28 days without the necessary permissions. The respondent believes that this new requirement will ensure all camping activities fall under the supervision of Parks authorities, which they view as a positive development.

Officer's response

Officers note the comments and support for the proposal.

Respondent 10

In the consultation, the respondent expressed scepticism about the necessity of the proposed measure, stating they have not observed the problem it aims to address. They criticised the current planning permission system as divisive and autocratic, advocating instead for a system where permission is granted based on clear criteria, supplemented by expert advice. This approach, they argued, would place planners and developers on equal footing, rather than the current system, which they described as outdated.

The respondent emphasised the need for planning control and expert advice but highlighted that the current system often results in poor decisions that are visually and practically inferior to what could be achieved through collaborative discussions.

Additionally, the respondent pointed out that requiring planning permission for family gatherings who wish to camp is unnecessarily burdensome.

Officer's response

Evidence for the proposal is provided in the Background paper and officers have added evidence from four case studies as an appendix to the background paper. The case studies are sites operating in the National Park contrary to permitted development rights and are having a harmful social and environmental impact. In accordance with the Planning and Compulsory Purchase Act 2004, all planning decisions must be made in accordance with the development plan, unless material considerations indicate otherwise. The development plan comprises of Future Wales: The National Plan 2040 and the Pembrokeshire Coast National Park's adopted Local Development Plan 2. The development plans provide a clear policy basis for decision making.

The Authority issued a clarification statement that was agreed by the National Park Authority on 26 March 2025. This provides clarity on the camping activities which are exempt from the Article 4(1) Direction. Please refer to the officer response provided in response to question two in this report.

Background Paper

Camping and Caravanning in Pembrokeshire Coast National Park –
Managing Impacts

May 2024

Updated in November 2024

Annex 4 and 5 added April 2025

Pembrokeshire Coast National Park Authority

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Background and Purpose

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

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

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

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

1.0 Introduction

1.1 The benefits of camping and caravanning are well known and for many decades it has been a popular form of holiday for visitors to Pembrokeshire. Many of the large camping and caravan sites in the County were established in the 1950s and 60s, attracting holiday makers in their thousands. Alongside the sites offering space to pitch your own caravan or tent, many site owners started purchasing static caravans to let out during the holiday periods. Facilities within the caravans quickly developed with solid fuel heating, hot water and insulation allowing them to be used for longer period of the year. By the 1980s further refinements had become the norm with mains water and flushing toilets. The now luxurious interiors and plumbed in central heating have ensured their long-lasting appeal.

1.2 Touring caravans have also long been a familiar sight in Pembrokeshire, alongside tents – both of which have undergone their own evolution in terms of coping with the unpredictable weather and degree of comfort. The increase in size of the tourers and changes to driving licenses has led to many now being pitched on a single site for the entire season with the owners visiting as they wish. Alongside them has grown campervan ownership providing the ability to stop up for the night anywhere – on site or off, and the advent of

glamping. A wide variety of structures are now commonly available to hire affording a high level of luxury for visitors whilst still offering the positive outdoor camping vibes.

2.0 The National Park

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

3.0 Planning Policy on Camping and Caravans

- 3.1 The 1950s and 60s rise in popularity of camping and caravanning came with a rapid increase of large sites around the coast of west Wales. When Dyfed County Council was formed in the 1970s they were tasked with preparing a Structure Plan for the County which, for the National Park and many other areas around the coast. It contained policies for the whole County and also provided the context for Plans prepared by individual local authorities, including the National Park Authority.
- 3.2 The Structure Plan contained a policy to control any further development of camping and caravan sites. Within this context the first Local Plan prepared for the National Park and its successor Unitary Development Plan covering the whole of Pembrokeshire maintained the same policy position of restricting any further camping and caravan development within the National Park. The National Park Authority continued the same policy in the 2010 Local Development Plan. In all, that policy position was in place for over three decades.
- 3.3 After 2010, camping and caravanning started once again to increase in popularity. Many of the existing sites were seeking changes from tent and touring caravan pitches to static caravans and there was a notable rise in the number of people visiting in campervans and motorhomes. This was also the

start of glamping. Pressure was increasing for additional camping and caravan sites. As part of the review of the Local Development Plan and in preparation for its replacement, the National Park Authority commissioned a study in 2015 to examine the capacity of the National Park to absorb further camping and caravan development, without harming the landscape and its special qualities.

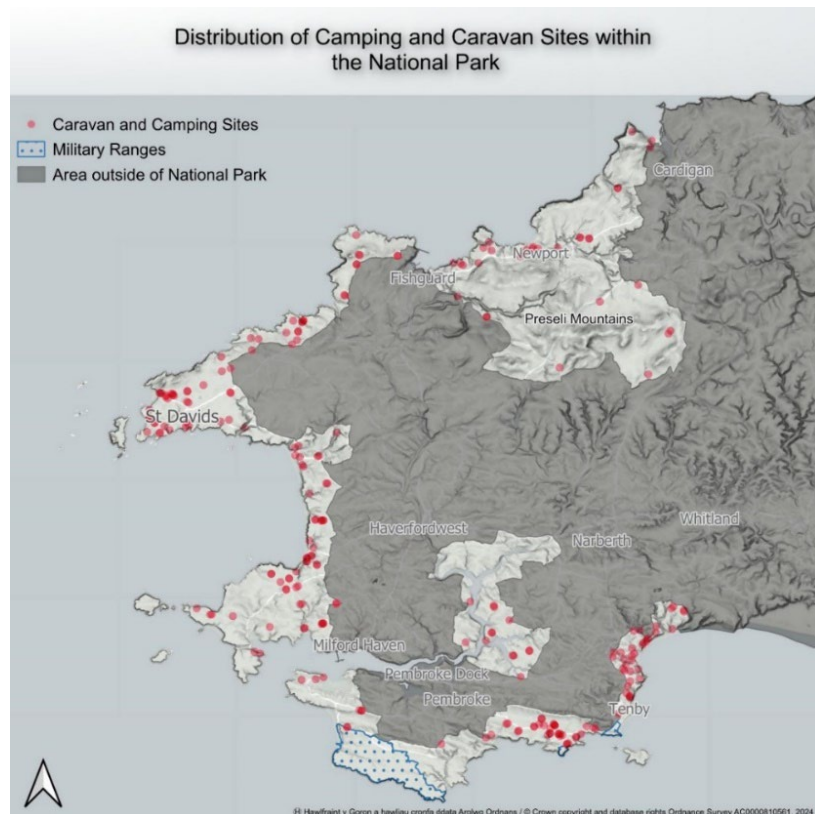
- 3.4 The study was used as part of the evidence base for preparing the policies of the second Local Development Plan (LDP2) and following adoption of the Plan in 2020 was published as Supplementary Planning Guidance¹. The Guidance identifies 28 landscape character areas throughout the National Park, 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;
 - 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.

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

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



- 4.5 In addition to the 7,500 pitches in the National Park, either with planning permission or operating under an exemption certificate, there remains a significant number of what are now popularly termed ‘pop-up’ camping sites. It would appear that these sites are using the 28-day permitted development rights to open a camping site without planning permission, but operate for a much longer period of time, which can be up to 6 months of the year (Easter to end of September).
- 4.6 Unauthorised camping and caravan sites form a significant element of enforcement work undertaken by the Authority. Since 2018, over 60 separate files have been opened. The actual number of planning breaches is much higher than this, but the Authority does not have sufficient resources to follow up each reported breach. Prior to the pandemic, camping and caravanning issues made up 11.35% of all enforcement cases (2019). The numbers fell during 2020 and 2021 due to lockdown measures being in place during which time there were national restrictions on sites operating and on-site visits being undertaken by National Park Authority staff. In 2022 the percentage of camping and caravan enforcement cases was 9.5% and in 2023 had risen to just over 12%.
- 4.7 In response to enforcement action taken by the National Park against breaches of the 28-day rights, it is common for landowners to submit a Certificate of Lawfulness application. This is granted when the landowner can demonstrate that they have operated for a period of 10 consecutive years, for longer than the 28-day period, immediately prior to the application being submitted to the Authority and without any enforcement action having been taken during that time. The National Park Authority is not able to consider the application of planning policy in these circumstances. Between 2015 and 2023 there were 9 successful Certificate of Lawfulness applications adding a further 400 pitches in the National Park. The table below shows that Certificate of Lawfulness

applications resulted in a much greater number of new pitches than those resulting from planning applications for new sites or changes within existing sites.

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

| | 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 that 86% (345 pitches) would not have been recommended for approval if judged against the Authority’s planning policies on camping and caravanning. This demonstrates a significant undermining of the evidenced and examined policies of the LDP2 resulting in potentially harmful landscape and infrastructure impacts on the National Park.

5.0 Scrutiny and Control with Planning Applications

5.1 When planning applications are submitted for camping and caravan sites the National Park Authority scrutinises the proposal against the policies of the Local Development Plan (LDP2), the Authority’s Supplementary Planning Guidance on Camping and Caravans (which is based on the landscape capacity study of 2015) and other relevant policies and guidance.

5.2 Policy 41 of LDP2 (see Annexe 2 to this document) relates to the provision and siting of new caravan and camping sites and extensions or changes to existing sites. New sites are permitted away from the coast and Preselis and in locations not intervisible with them. The policy refers to the need to avoid sensitive locations, for development to be assimilated into the landscape, that there should be no cumulative effects when considered in conjunction with other development, and the need to reuse existing building and structures rather than provide new, where possible.

5.3 The Supplementary Planning Guidance indicates where there is any space capacity in the landscape to accommodate new camping and caravan development, and advises on appropriate scale and operating times for new sites. It also provides guidance to minimise potentially harmful and visual impacts of new sites.

5.2 The Authority also seeks advice from statutory agencies including the Highway Authority, Natural Resources Wales, Dwr Cymru/Welsh Water and Pembrokeshire County Council's Public Health team. The outcome of the planning application is based on a thorough consideration of the policies and responses received.

5.3 Whilst each application will have particular elements, the main aspects for consideration by the Authority are:

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

5.4 When planning permission is granted planning conditions are used to control:

- The site area
- The number and type of pitches (static caravan, touring caravan, tent, glamping etc)
- The layout of pitches and protection of areas of sensitivity
- The period of operation of the site
- Use of accommodation on the site for holiday use

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

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

6.0 Permitted Development – Planning Permission not needed

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

6.2 Exemption Certificate Sites

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

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.

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

6.9 28-Day Sites

Sites set up under the 28-day rule are not subject to any form of scrutiny. Whereas landowners establishing sites in England are required to notify the planning authority in advance of opening, this is not required in Wales.

6.10 This way of setting up a camping site is allowed on land-holdings of 5 acres or more and permits the use of the land for up to 3 caravans or motorhomes or campervans and an unspecified number of tent pitches. No structures other than the most basic, temporary facilities such as a standpipe and portaloo are permitted without planning permission. The temporary nature of the sites is clearly to allow landowners to operate for a short period of time. The reality is, however, that sites operate in this way for several months at a time. This is clear in the number of Certificate of Lawfulness applications received by the National Park Authority in response to enforcement action being taken.

6.11 Complaints received about unauthorised sites include:

- Littering and use of public bins for dumping of waste
- Waste water cassettes being emptied in hedgerows
- Waste water cassettes being emptied in public toilets (often not connected to the mains sewer)
- Noise to neighbouring properties
- Congestion and traffic problems
- Fires
- Some communities have felt inundated with sites without any opportunity to raise their concerns other than through complaint after the sites are established.

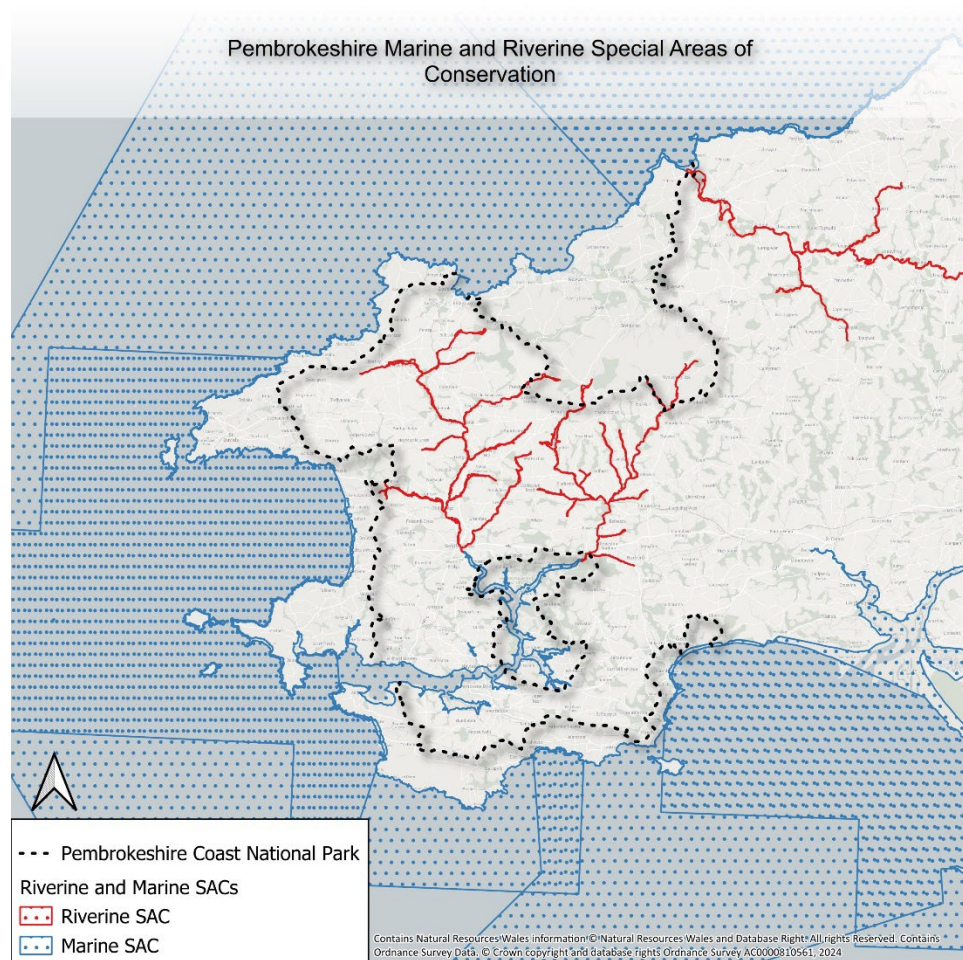
6.12 Sites set up through permitted development rights are not subject to the same scrutiny or public consultation as those requiring planning permission. Over the last few decades, laws and regulations to protect the natural environment have increased but permitted development sites are operating for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

Table 2 Issues experienced

| | Issue | Evidence and Reasons |
|----|--|---|
| a. | Risk to the landscape through individual and cumulative site impacts | There is very limited capacity in the National Park for additional sites without harm to the landscape. This has been demonstrated through the development of the evidence base for the Local Development Plan 2 and the supporting Supplementary Planning Guidance on Caravan and Camping (see extract in Annexe 1). There are no restrictions on the number of sites nor pitches within sites arising through permitted development rights. A high number of Certificate of Lawfulness applications granted permission that would be contrary to planning policies intended to protect the National Park and its Special Qualities. |
| b. | Over-burdening of infrastructure – | Parts of Pembrokeshire are affected by water supply issues which are generally highlighted |

| | Issue | Evidence and Reasons |
|----|---|--|
| | particularly water supply, sewage management and highways. | through the planning application process by Dwr Cymru/Welsh Water. Permitted development site operators are not subject to the same requirements with potential for consequent deterioration of the supply. Lack of consultation with the authorities over private water supplies with potential for significant public health impacts. Failing water quality in the riverine and marine Special Areas of Conservation in Pembrokeshire (see map 2 below) potentially arising from unregulated foul water discharges. Sites are often accessed by narrow lane network unsuited to large increases in traffic, particularly by larger vehicles and caravans. |
| c. | Potential for significant increase in phosphates. | The potential for unregulated water discharges identified in b may lead to potential increases in phosphates within riverine and marine Special Areas of Conservation. Outdoor kitchens, individual toilets and showers and hot-tubs have become commonplace on many sites. |
| d. | Camping sites being located in remote areas giving greater numbers of people instant access to sensitive locations and difficult terrains. | Potential for damage and increased erosion caused to footpaths. Potentially dangerous accesses created down steep cliff edges to beaches. Increased reports of disturbance to wildlife, e.g. seals and their pups on beaches. Gradual erosion of sense of remoteness and appearance of elements associated with more established and managed environments. |
| e. | Complaints from operators of sites with planning permission and site licenses about the lack of scrutiny and monitoring of permitted development sites. | A two-tier system is in operation with significant variation in the requirements needed for lawful operation and subsequent levels of cost. Potential for the cumulative impact of the proliferation of permitted development sites resulting in planning applications for new camping sites not being supported. |
| f. | Lack of opportunity for public engagement or consultation on 28-day sites. | No opportunity for the public to comment on sites prior to their establishment, as there would be with planning applications. Enforcement can be taken after 28 days has lapsed but lengthy procedures mean that sites have generally closed for the season before it is completed. |
| g. | Undermining of the planning system in the National Park. | The Authority's LDP2 has gone through extensive and rigorous consultation and examination to demonstrate it is founded on sound evidence. Widespread and increasing use of permitted development rights is undermining the planning system. |

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



7.0 Actions Taken to Date

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

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

| | 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 |

| | Action | What has it achieved? | Is it still happening? |
|----|--|---|---|
| | | | random visits to sites as part of the licensing scheme but their capacity to do this is constrained by resources. |
| 2. | We used aerial photography to maintain the survey work formerly undertaken by means of the flown survey. | Regular monitoring of existing sites to ensure compliance with planning permissions granted and pitch occupancy monitoring. It also highlights some unauthorised developments, particularly those linked to existing caravan sites. | Yes. Our data is updated when aerial photography updates are published by Welsh Government. |
| 3. | We compiled a comprehensive set of data, including mapping of all caravan and camping sites in the National Park. | Regular monitoring of existing sites to ensure compliance with planning permissions granted. It also helps to identify incidents of unauthorised development more promptly. | Yes. This is maintained and regularly updated. |
| 4 | We liaised with Pembrokeshire County Council to ensure that the number and type of pitches within each site tallied for the two Authorities. Regular liaison meetings continued for a time. | It provided a comprehensive and co-ordinated data set and identified anomalies which could be followed up via enforcement. | No. There was a change of personnel at PCC in 2016 following a re-organisation after which their resources were redirected to other issues. |
| 5. | In 2017 we produced and published an information leaflet for caravan and campsite operators. | It provided easy to read information for site owners and those intending to operate sites. | Yes. The leaflet remains available on our website 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 | Provided the evidence required to support a | Yes. The policy is in operation and the study is |

³ [28 Day Guide](#)

| | Action | What has it achieved? | Is it still happening? |
|-----|--|---|---|
| | to inform future local planning policy on camping and caravanning in the National Park. | policy change in the Local Development Plan from a long-standing policy of restraint to one identifying where limited further development can be considered. | used as Supplementary Planning Guidance. |
| 8. | In 2021 we had a meeting with the Welsh Government officer responsible for issuing the Exemption Certificates to organisations to communicate our concerns about the widespread abuse of the system. | Raised awareness of the problems facing this Authority with Welsh Government. | No. The issue wasn't recognised by the WG Officer and they were not minded to take any action. |
| 9. | We have raised the issue of unauthorised camping at the all Wales Camping and Caravan Forum, also attended by Welsh Government and representatives of the camping and caravan industry. | Provided information to the sector and others attending the meeting and garnered support for seeking further control for sites established under the 28-day rule. | Yes. The Forum meets twice a year and the issue is regularly discussed. |
| 10. | We have attended local meetings organised by the all Wales Camping and Caravan Forum and also by Pembrokeshire County Council to present information and awareness of issues to the local operators. | Provided information to the sector locally and garnered support for seeking further control of Certificated Sites and 28-day sites operating outside of their permitted rights. | Yes. We attend meetings whenever possible although they have been less frequent since the covid lockdown. |
| 11. | We liaised with Pembrokeshire County Council, the Police, National Trust and other agencies to control widespread and significant unauthorised camping in the 2020 and 2021 seasons. | Aimed to protect the landscape and environment from unauthorised camping outside of sites and the consequences of very high numbers of visitors to the area. | Yes. Meetings occur sporadically to deal with specific issues/locations. |
| 12. | Where opportunities arise and where appropriate we have encouraged operators of Exemption Certificate sites to apply for planning permission. | Ensures sites remain appropriate in terms of location, size etc. | Yes. Ongoing where opportunities arise. |
| 13. | We responded to the Welsh Government's consultation regarding | The Welsh Government has not yet responded to | Yes. Awaiting response/action from Welsh Government. |

| | Action | What has it achieved? | Is it still happening? |
|-----|---|--|---|
| | the extending of 28 days to 56 days for pop-up campsites stating the reasons why we would be opposed to such a change. | this element of the consultation. | |
| 14. | Further liaison with Welsh Government regarding the issuing of Exemption Organisation Certificates. | The Welsh Government has agreed to consider the issues raised further. | Yes. Awaiting response/action from Welsh Government. |
| 15. | Stakeholder workshops held with statutory undertakers and exemption organisations to raise awareness of the issues and initiate further action. | There was a range of responses including support for the removal of permitted development rights; increased engagement and not wanting any change to the current regime. | Yes. This current consultation exercise is the next step in gathering wider opinion on the issues and possible actions, if any, required. |

8.0 Options for Change

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

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

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

8.4 Experience from Elsewhere

- Cornwall – Extensive areas of the Cornish coast have been subject to Article 4 Directions to control camping and caravanning since the 1970s. Cornwall is very similar to Pembrokeshire in having a very long and dramatic coastline and is very popular with visitors. The areas are designated as Areas of Outstanding Natural Beauty.

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

8.5 There are several options available to Pembrokeshire Coast National Park Authority to manage new camping and caravan sites, which were subject to consultation with the public, stakeholders and campsites operating with planning permission and exempted organisations.

Table 4: Options

| | 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. |

| | Option | Outcome |
|------|--|--|
| iii. | To introduce an Article 4 Direction to remove permitted development rights for 28-day camping sites. | This would give the Authority the ability to properly consider applications for this type of sites as well as allowing opportunity for public consultation and liaison with other regulators. It would also reduce the potential for abuse of permitted development rights for sites operating for more than 28 days. |
| iv. | To introduce an Article 4 Direction to remove permitted development rights for Exemption Organisation camping and caravan sites. | This would give the Authority the ability to properly consider applications for sites currently operated under certificate. The likely effect would be for operators to cease membership of such organisations and therefore reduce any positive effects from increased engagement for good practice with the Exemption Organisations. |
| v. | To introduce an Article 4 Direction to remove permitted development rights for 28-day and Exemption Organisation camping and caravan sites | The outcome of this would be a combination of items iii and iv above. |

9.0 Summary and Conclusions

- 9.1 The National Park has long been a popular destination for visitors coming for camping and caravan holidays. Whilst recognizing the benefits of camping for those wishing to enjoy the National Park, the National Park Authority is responsible for protecting against harm to the protected landscape – within the remit of the two purposes and duty assigned by legislation. It also has a duty under the Environment Act 2006 known as the Section 6 duty which requires that public authorities that exercise their functions have a duty to maintain and enhance biodiversity and promote the resilience of ecosystems.
- 9.2 Following several decades of restrictive planning policies limiting the development of new camping and caravan sites, the National Park Authority commissioned a study in 2015 to examine what capacity there is to accommodate more sites without harm to the landscape. The conclusion was that there is only very limited capacity in some locations, whilst others are already at capacity. The study was used to inform the current Local Development Plan (LDP2) and subsequently was adopted as Supplementary Planning Guidance to the Plan.
- 9.3 LDP2 and the Supplementary Planning Guidance are used when determining planning applications for camping and caravan proposals. Permitted

development rights, however, also allow the creation of new sites without the need for planning permission. There are types of permitted development rights:

- Exemption organisation sites
- Twenty-eight day sites

- 9.4 This form of development has contributed greatly to the number of camping and caravan pitches in the National Park but without the degree of scrutiny or public consultation given by sites going through the planning application process. In addition, widespread abuse of 28-day permitted development rights has resulted in sites being granted lawful use in locations that would not comply with planning policy. This is undermining the Authority's ability to properly plan for the area and also conflicts with the Authority's strategy of regenerative tourism.
- 9.5 The National Park Authority has deployed various means of trying to manage the situation and fulfil its responsibility to protect the National Park and its special qualities. These have met with limited success and now it is proposing the need to use a non-immediate effect Article 4 (1) Direction to remove permitted development rights for the use of land for camping and/or caravans for not more than 28 days. Other parts of England and Wales with similar characteristics and issues as those faced by in the National Park are already using Article 4 Directions to control the permitted development rights for camping and caravanning.
- 9.6 There are several options for the National Park Authority to consider relating to how much additional control is required to resolve the issues which are set out fully in this paper and summarized below:

Table 5: Issues

| | 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 varies between a wide range of Exemption Organisations. | No accountability. |
| 2. | Lack of scrutiny of proposals prior to site set up | Some Organisations have their own standards and procedures in place and are encouraged to consult the National Park Authority and other regulators by Welsh Government. | No consultation with the planning authority or any other bodies is required. |

| | Issue | Exemption Organisation Sites | 28-Day Sites |
|----|--|---|---|
| 3. | Monitoring of operations once site is opened | Organisations are required to inspect sites annually. Some inspect more frequently. There is variation between organisations in the standards and monitoring undertaken. | None required. |
| 4. | Consultation with neighbours | Not required but Organisations should seek to minimise disturbance to neighbours. | None required. |
| 5. | Misuse of Permitted Development rights | Matters dealt with by the National Park include: Unauthorised structures; Operating for more than the permitted number of caravan pitches; Operating for longer than the permitted period. | Matters dealt with by the National Park include: Landscape impact; unauthorised structures; Operating for significantly longer than the permitted period; nuisance caused to neighbours and the wider community; traffic congestion. |

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

Table 6: Preferred Options shown in 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. |

⁴ Repeat of Table 4, above

| | Option | Outcome |
|------|--|---|
| 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. |

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

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

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

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

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

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

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

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

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

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

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

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

Extract from adopted Supplementary Planning Guidance – Caravans and Camping

Annexe 2: Policy 41 of the Adopted Local Development Plan

Policy 41 Caravan, Camping and Chalet Development

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

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

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

Proposals coming forward as set out above must ensure that:

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

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

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

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

Table 7 Definition of Different Types of Development

| 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 ⁶ and Cons ⁷

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Annex 4: 28-Day Camping and Caravanning Case Studies.

Added April 2025

This appendix provides case studies demonstrating the impacts identified in the background paper.

Introduction

This Case Study assessment evaluates four temporary campsites and their impacts on the special qualities of the National Park. Geographically dispersed across the southern, central, and northern regions of the Park, each site presents distinct threats to the National Park. These case studies demonstrate some of the problems created by the existing permitted development rights as well as examples of the challenges created by operational development which is not authorised by the existing permitted development rights legislation. Some of the threats relate to the failure of the existing legislation to safeguard sensitive ecological and historic features as well as the landscape of the National Park. These recurring issues underscore the Authority's objective for the Article 4(1) Direction, which would enable the Authority to exercise greater control over such harmful developments in the future.

Site 1

Background:

This site lies within the Pembrokeshire Coast National Park Landscape Character Assessment (LCA) Area 28: 'Daugleddau'. This LCA is unique in the National Park in that it is physically detached from the remaining areas of the Park by some distance. As such, there is a great sense of tranquillity, produced by the enclosed large water body, whether at high or low tide, and the feeling of being on a quiet backwater. The management advice for the area advises that recreational pursuits should be monitored to ensure minimal disturbance, and protect the long-term survival of the estuarine habitats and associated species.

Identified Planning Constraints:

- Grade 2 ALC
- High Risk Coal Area
- Historic Landscape – Milford Haven Waterway
- Regionally Important Geodiversity Site
- Biodiversity Issues
- Pembrokeshire Marine SAC
- SSSI: Milford Haven Waterway
- TAN 15 – Flood Zone 3 (River and Seas)
- PCNPA Landscape Character Area
- PCNPA Seascape Character Area

Key Issues:

Access

As illustrated in Image 1, site access follows the estuary foreshore, as indicated by campsite signage. This presents several critical constraints:

- **Single Access Route:** The river track serves as the sole ingress and egress point, with the entire site situated within Flood Zone 3. This restricts emergency access and evacuation capabilities in flood conditions, posing risks to both visitors and responders.
- **Environmental Sensitivity:** The estuary foreshore falls within a Site of Special Scientific Interest (SSSI) and directly borders a Special Area of Conservation (SAC), both designated for their ecologically significant marine habitats. Repeated vehicular traffic across this area risks causing long-term degradation to these fragile ecosystems, which are highly susceptible to disturbance. This risk is something that the Authority cannot control when the site is operating within existing 28 day permitted development rights.

Waste Management

Images 2 and 3 document residual waste and abandoned toilet facilities from the 28-day operation. Key concerns include:

- **Improper Waste Disposal:** Overflowing bins and a derelict wooden toilet structure indicate inadequate site management.
- **Groundwater Contamination Risk:** If human waste and chemical additives from portable toilets seep into the soil, they may infiltrate groundwater, potentially compromising the adjacent estuarine SAC.
- **Ecological Threat:** Poorly managed refuse can lead to marine pollution (within a SAC), adversely affecting water quality and local biodiversity.

Cumulative Impact

The combination of unrestricted vehicular access through a protected habitat and inadequate waste disposal practices poses a significant threat to the SSSI and SAC. Without mitigation, these factors may lead to:

- Habitat degradation from physical disturbance and pollution.
- Regulatory non-compliance with environmental protection statutes.
- Long-term ecological damage, undermining conservation efforts.

IMAGE 1



IMAGE 2





Site 2

Background:

This site lies within the Pembrokeshire Coast National Park Landscape Character Area (LCA) 18: 'St. Davids Headland'. LCA 18 describes this area of the National Park as a large tract of rolling lowland and associated coastal area of cliffs and beaches occupying much of the headland. The LCA management guidance goes on to advise that any proposed caravan parks - or extensions to existing sites - to be located so as to minimise visual impact within the landscape and respect the historical significance of this area; mitigate existing visual impacts.

Identified Planning Constraints:

- Grade 3a ALC
- Historic Landscape – St. Davids Peninsula and Ramsey Headland
- Cadw Heritage Coastline
- Within the setting of a Scheduled Ancient Monument
- Biodiversity Issues
- Pembrokeshire Marine SAC
- Special Protection Area - Ramsey and St David's Peninsula Coast
- SSSI: St Davids Peninsula Coast
- Pembrokeshire Coast Path
- PCNPA Landscape Character Area
- PCNPA Seascape Character Area

Key Issues:

Visual Intrusion

Image 7 illustrates the expansive use of multiple fields under the 28-day rule, accommodating tents and camper vans in close proximity to the coast over an area of approximately 6.5 hectares. This has raised issues such as:

- **Prominent Exposure:** The site's elevated topography (Images 5 & 6) makes tents and camper vans highly visible from several public vantage points,

including the adjacent Pembrokeshire Coast Path and from the top of the Carn Llidi hills. The Coast path is a sensitive landscape receptor and is not afforded any degree of protection under the 28-day legislation.

- **Limited Screening:** With open unspoilt views out to sea with no discernible features and long views along the coast, the lack of natural screening such as hedgerows exacerbates the visual impact of these temporary structures.
- **Landscape Harm:** The prominent rocky outcrops on the hilltops above this 28-day campsite create a pervasive sense of exposure. As demonstrated in Images 5 & 6 (before/after comparison), the introduction of camping activities along the coastal fringe has resulted in a marked deterioration of the site's natural tranquility and scenic quality. The visual intrusion caused by this temporary campsite is particularly concerning, as the uncontrolled siting of 28-day campsites falls outside the Authority's enforcement jurisdiction.

Impact on Scheduled Ancient Monument

The temporary campsite is located in close proximity to Scheduled Ancient Monument (SAM) PE012: St. Patrick's Chapel. The remains of the chapel lie within the sand dunes immediately above the high tide line at the beach, and is afforded statutory protection under the Ancient Monuments and Archaeological Areas Act 1979.

- As a result of 28-day sites falling outside the normal planning control process, the Authority has no statutory mechanism to consult with key heritage bodies such as Cadw or the Dyfed Archaeological Trust (Heneb), as would be the case were the campsite subject to full planning consent. This regulatory gap means that the potential visual, physical, or landscape impacts of such developments on the setting of this SAM are not subject to the usual heritage assessments or mitigation measures.
- The proximity of this 28-day site (as seen in Image 8) to a designated monument raises serious concerns about the safeguarding of the historic environment, particularly with the uncontrolled visitor presence above the site.

Cumulative Impact

In the absence of planning oversight, 28-day sites can adversely impact the integrity of the historic environment and the character of the protected coastal landscape.

- No mechanism exists to assess or mitigate environmental and heritage impacts
- Statutory consultees such as Cadw and the Dyfed Archaeological Trust cannot be engaged.

IMAGE 5



IMAGE 6



IMAGE 7



IMAGE 8



Site 3

Background:

This site lies within the Pembrokeshire Coast National Park Landscape Character Assessment (LCA) Area 24: 'Dinas Head'. The area is described as being relatively peaceful and is dominated by pastoral agriculture with fields bounded mostly by traditional hedgebanks, and small pockets of woodland and scrub. The LCA management guidance advises that the Authority should Conserve the pastoral agricultural and woodland mosaic character, promoting and supporting the regular cyclical management of traditional field boundary hedgebanks.

Identified Planning Constraints:

- Biodiversity Issues
- PCNPA Landscape Character Area
- PCNPA Seascape Character Area

Key Issues

Landscaping & Biodiversity Loss

The site was originally an undeveloped parcel of land bordered by mature hedgerows. Images 9 and 10 illustrate the transformation following extensive landscaping works, which involved:

- **Removal of Native Vegetation:** Hedgerows, trees, and grassland were cleared, significantly altering the site's ecological character.
- **Potential Habitat Disruption:** Given the proximity of dormouse records held by the Authority's Ecologist, it is reasonable to conclude that the removed hedgerows may have supported this protected species.

While Image 11 shows compensatory conifer planting along the boundaries, this measure is ecologically inadequate because:

- Conifers do not replicate the biodiversity value of native hedgerows.
- They fail to provide equivalent habitat complexity or support the same species (e.g., dormice, nesting birds, invertebrates).

Introduction of Permanent Infrastructure

This pop-up campsite introduced several irreversible changes, including:

- **Hardstanding Access Track:** An 80m hardcore track leading to the container unit (Image 12), increasing impermeable surfaces and altering hydrological drainage.
- **Utilities Installation:** Underground cabling (for automated gates) and water taps further urbanised the site, shifting its character from pastoral to domestic.

Cumulative Impact

The combined effects of habitat removal and permanent infrastructure have resulted in:

- **Net Biodiversity Loss:** Insufficient mitigation for removed vegetation.
- **Landscape Fragmentation:** Disruption of ecological connectivity.
- **Long-Term Alteration of Land Use:** The site's original agricultural function has been fundamentally compromised.

IMAGE 9



IMAGE 10



IMAGE 11



IMAGE 12



IMAGE 13



Site 4

Background:

This site lies within the Pembrokeshire Coast National Park Landscape Character Assessment (LCA) Area 4: 'Manorbier/Freshwater East'. This area is distinct for its farmland landscape, with a coastal feel, enhanced by attractive views of coastal cliffs to the east. The wealth of historical and archaeological sites documented in this area means that strong historical and cultural sense of place. The management guidance advises that as far as possible ancient monuments and remains are not lost or damaged.

Identified Planning Constraints:

- Within the setting of a Scheduled Ancient Monument
- Historic Landscape - Manorbier
- PCNPA Landscape Character Area
- PCNPA Seascape Character Area

Key Issues:

Impact on Scheduled Ancient Monument

The temporary campsite is situated within the immediate vicinity of SAM PE311: Carew Beacon Round Barrows. The monument comprises the remains of an earthen built round barrow and is of national importance for its potential to enhance our knowledge of prehistoric burial and ritual practices. Being an ancient monument, it has legal protection, and damage to the site is a criminal offence.

- **Policy Conflict:** This development contravenes national and local planning policy, which explicitly emphasises the preservation of ancient monuments and their settings. However, the current 28-day legislation does not allow for enforcement simply on this basis.
- **Sensory and experiential qualities:** The installation of infrastructure (as documented in images 14-17) has demonstrably altered the setting of the monument. The setting of a monument is often regarded in visual terms but is, in fact, more than solely aesthetic. In basic terms it can be considered in the way in which a monument is seen, understood and experienced, and may include elements such as tranquillity, remoteness, links to other sites and designed surroundings or deliberate view lines. The operations that have taken place compromised how this monument can be enjoyed and understood.

Introduction of Inappropriate Structures

Images 16 and 17 document the installation of perimeter fencing, a children's play area, and Toilet/shower facilities

Although presumably temporary, these structures have:

- **Visual Intrusion:** Introduced discordant domestic elements into an agricultural landscape, eroding its wild character.
- **De Facto Permanence:** Given the scale of the operations at the site, the likelihood of post-28-day demobilization is low.

Cumulative Impact

The combined impacts of physical alterations and visual encroachment have:

- Undermined the significance of Scheduled Ancient Monument, contrary to Conservation Principles.
- Created incremental harm to the historic environment.

IMAGE 14



IMAGE 15



IMAGE 16



IMAGE 17



Annex 5: Enforcement Case Analysis: Caravan Sites & Campsites (2015-2025)

Table 1 presents enforcement case data held by the Authority related to caravan sites and campsites between 2015 and 2025. Key findings include:

- **Total cases opened:** 182 (camping and caravanning)
- **Cases involving 28-day permitted development sites:** 39
- **Cases requiring enforcement action:** 8 (due to non-compliance with permitted development rules)

The relatively low number of enforcement actions reflects fundamental limitations in the current regulatory framework. Planning authorities can only intervene when clear breaches occur, such as exceeding the 28-day limit, a material change of use or the erection permanent structures. Crucially, the legislation provides no mechanism to address landscape, ecological or other environmental impacts, meaning sites within protected landscape designations (SSSIs or Marine SACs) often operate without proper oversight. Each case investigation demands significant time and resources from the Authority, regardless of whether a breach is ultimately confirmed. The introduction of an Article 4(1) Direction to remove these permitted rights would improve enforcement efficiency by eliminating the need to investigate numerous marginal cases under the current system.

Table 1.

| Year | Case No. | Nature of problem | 28 Day Campsite | Enforcement History |
|-------------|-----------|--|-----------------|---|
| 2015 | EC15/0003 | Camping site | yes | No Breach |
| | EC15/0014 | Unauthorised use of holiday caravans as residential | no | No Breach |
| | EC15/0033 | Caravans being replaced with lodges | no | No Breach |
| | EC15/0045 | Additional touring caravans on the land | | No Breach |
| | EC15/0046 | Unauthorised change of use of agricultural land and other breaches | | Further Enforcement Action Taken |
| | EC15/0058 | Unlawful Caravan on site | no | No Breach |
| | EC15/0066 | Touring caravan parked in grounds | no | No Breach |
| | EC15/0082 | Caravan and Log Cabin being lived in | | No Breach |
| | EC15/0079 | Change of use of land to a mixed use for agriculture, the keeping of horses and for gypsy/traveller and/or residential purposes through the siting of a static caravan used for residential purposes | no | Further Enforcement Action Taken |

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|-----------------|-----------|--|-----|---|
| | EC15/0097 | Camp Site set up | | No Breach |
| | EC15/0101 | Unauthorised use of land for caravans | yes | Further Enforcement Action Taken |
| | EC15/0102 | Unauthorised use of land for camp site | | No Breach |
| | EC15/0122 | Unauthorised stables, caravan, storage of vehicles/boats and change of use to equine and sand school. Also storage of general building supplies. | no | Further Enforcement Action Taken |
| | EC15/0123 | Siting of caravan for human habitation | no | No Breach |
| | EC15/0136 | Static Caravan | no | No Breach |
| 2016 | EC16/0001 | Unauthorised residential caravan | no | No Breach |
| | EC16/0007 | Unauthorised full residential use of static caravan. | no | No Breach |
| | EC16/0008 | Static caravan being used for residential purposes | no | No Breach |
| | EC16/0010 | Unauthorised Caravan | | No Breach |
| | EC16/0025 | Unauthorised chalet and 2 static caravans | no | No Breach |
| | EC16/0027 | Siting of large static caravan | no | No Breach |
| | EC16/0058 | Unauthorised camp site | | No Breach |
| | EC16/0066 | Alleged unauthorised use of site (28 day rule) | yes | No Breach |
| | EC16/0067 | Caravan siting and use as permanent residence | | No Breach |
| | EC16/0076 | Additional Caravans on the land | yes | No Breach |
| | EC16/0078 | Unauthorised static caravan and wooden cabin | no | No Breach |
| | EC16/0087 | Setting up of new campsite | | No Breach |
| | EC16/0096 | Siting of 2 static caravans being advertised as residential | no | No Breach |
| | EC16/0097 | Unauthorised camping site | | No Breach |
| no file? | EC16/0113 | Unauthorised camper vans on site | yes | No Breach |
| | EC16/0117 | Change of use of land from agriculture to car park, installation of payment machine and laying of hardstanding. | no | Further Enforcement Action Taken |
| | EC16/0120 | Unauthorised caravan/camping site | | No Breach |
| | EC16/0122 | Unauthorised farm buildings, slurry lagoon, silage clamps and caravans | no | Further Enforcement Action Taken |
| | EC16/0123 | 2 Caravans on site | No | Further Enforcement Action Taken |

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|-------------|-----------|--|-----|---|
| | EC16/0124 | Unauthorised caravans on site | no | Further Enforcement Action Taken |
| | EC16/0133 | Alleged Unauthorised Caravan Site | yes | No Breach |
| | EC16/0135 | Unauthorised Yurt | no | No Breach |
| | EC16/0136 | Siting of caravan and change of use of land | no | No Breach |
| 2017 | EC17/0020 | Use of field as campsite and erection of composting toilet | yes | No Breach |
| | EC17/0023 | Approximately 5 static caravans moved onto site | no | No Breach |
| | EC17/0025 | Hedge planted in wrong place and extra caravans on site. | no | Further Enforcement Action Taken |
| | EC17/0029 | Static caravan with porch to front of property | | No Breach |
| | EC17/0032 | Unauthorised residential caravan | no | No Breach |
| | EC17/0034 | Unauthorised works to land and residential caravan on site | no | No Breach |
| | EC17/0053 | Alleged unauthorised caravan, general builders storage area and new track | no | No Breach |
| | EC17/0058 | Alleged caravan advertised for holiday let | | No Breach |
| | EC17/0072 | Unauthorised camping site | yes | No Breach |
| | EC17/0073 | Change of use of land from agriculture to storage of caravan/wagons and construc | no | No Breach |
| | EC17/0081 | Erection of shed & porch & use of caravan as separate residential unit | no | No Breach |
| | EC17/0082 | Breach of Condition 2 of Permission NP/464/93 (over 35 touring caravans on site) | no | Further Enforcement Action Taken |
| | EC17/0096 | Unauthorised use of land as campsite | yes | No Breach |
| | EC17/0100 | Possible unauthorised camping site | yes | No Breach |
| | EC17/0103 | Unauthorised residential caravan | | No Breach |
| | EC17/0113 | Use of static caravan as an independent residential unit | no | No Breach |
| | EC17/0114 | Caravan being let out as holiday accommodation | no | No Breach |
| | EC17/0121 | Erection of signage and use of land as camp site for over 28 days | yes | No Breach |
| | EC17/0128 | Two unauthorised residential caravans | no | No Breach |
| | EC17/0129 | Alleged unauthorised residential caravan | no | No Breach |
| | EC17/0136 | Erection of hut and siting of caravan | yes | No Breach |
| 2018 | EC18/0022 | Alleged unauthorised camping site | no | No Breach |

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|-------------|-----------|---|-----|---|
| | EC18/0034 | Unauthorised business use | no | Further Enforcement Action Taken |
| | EC18/0107 | Occupation of mobile home on land | no | No Breach |
| | EC18/0115 | Unauthorised display of an advertisement & siting of camper vans and unauthorised camp site exceeding 28 days | yes | Further Enforcement Action Taken |
| | EC18/0117 | Unauthorised enlargement of camp site area and siting of camper vans. | no | No Breach |
| | EC18/0155 | siting of unauthorised yurt and campervan | no | No Breach |
| | EC18/0170 | Erection of large yurt and conversion of outbuilding | no | No Breach |
| | EC18/0186 | Possible unauthorised campsite | yes | No Breach |
| | | | | No Breach |
| 2019 | EC19/0004 | Unauthorised camping & caravan site | yes | Further Enforcement Action Taken |
| | EC19/0007 | Siting of unauthorised mobile home | no | Further Enforcement Action Taken |
| | EC19/0009 | Unauthorised camping & caravan site | yes | Further Enforcement Action Taken |
| | EC19/0010 | Unauthorised Camping & caravan site | no | Further Enforcement Action Taken |
| | EC19/0011 | Unauthorised camping & caravan site | no | No Breach |
| | EC19/0015 | Unauthorised camping and caravan site | yes | No Breach |
| | EC19/0018 | Unauthorised use of tent pitch area for touring caravans | | Further Enforcement Action Taken |
| | EC19/0020 | 2 caravans and a camper van in field | no | Further Enforcement Action Taken |
| | EC19/0027 | Camping and touring caravan site and use of shepherd's hut as holiday accommodation | yes | Further Enforcement Action Taken |
| | EC19/0028 | Use of unauthorised cabin for holiday accommodation | no | Further Enforcement Action Taken |
| | EC19/0031 | Sub-division of property through use of caravan as holiday accommodation | no | Further Enforcement Action Taken |
| | EC19/0032 | Subdivision of property through use of caravan as holiday accommodation | no | No Breach |

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|-------------|-----------|---|-----|---|
| | EC19/0036 | Change of use of land for glamping pods and lodges | | Further Enforcement Action Taken |
| | EC19/0042 | Unauthorised use of field as part of campsite | | Further Enforcement Action Taken |
| | EC19/0053 | Unauthorised use of yurt as holiday accommodation | no | Further Enforcement Action Taken |
| | EC19/0065 | Treepod bunkhouse | | No Breach |
| | EC19/0068 | Alleged unauthorised caravan site | | Further Enforcement Action Taken |
| | EC19/0075 | Extension of caravan site for positioning of additional caravans | | No Breach |
| | EC19/0078 | Bell tents being used for hire in grounds | no | No Breach |
| | EC19/0092 | Change of use of Tent Campsite into Touring Caravan and Tent Campsite, Unauthori | | No Breach |
| | EC19/0124 | Breach of planning condition re number of tourers on site | | No Breach |
| | EC19/0131 | Unauthorised campsite, cafe and commercial use of outbuildings | yes | No Breach |
| | EC19/0136 | Unauthorised glamping pod for holiday use | no | No Breach |
| | EC19/0174 | Alleged unauthorised change of use from agricultural land to caravan storage area | | No Breach |
| | EC19/0177 | Alleged breach of condition | | No Breach |
| | EC19/0201 | Unauthorised reception building and other developments and activities | | No Breach |
| 2020 | EC20/0003 | Material change of use of land for the storage of caravans | no | Further Enforcement Action Taken |
| | EC20/0073 | Unauthorised use of land for caravan sales | | No Breach |
| | EC20/0076 | Unauthorised use of land for touring caravans | | No Breach |
| | EC20/0077 | Unauthorised structures, caravans and hardcore track in field | | No Breach |
| | EC20/0090 | Erection of Glamping Pods/Yurts in Paddock | | No Breach |
| | EC20/0095 | Alleged unauthorised campsite | | No Breach |
| | EC20/0096 | Unauthorised Camping Site and toilets set up in field | yes | No Breach |
| | EC20/0101 | Alleged unauthorised use of caravan as holiday let | | No Breach |
| | EC20/0110 | Alleged increase of caravan/camping pitches | no | No Breach |
| | EC20/0120 | Siting of caravan for residential purposes and construction of porch/covered area | no | Further Enforcement Action Taken |
| | EC20/0137 | Unauthorised Siting of Caravan | no | No Breach |

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|-------------|-----------|--|-----|---|
| 2021 | EC21/0007 | Bungalow & static caravans being used against Covid 19 regulations | no | Further Enforcement Action Taken |
| | EC21/0012 | Alleged Unauthorised Glamping/Camping Site with Associated New Buildings & Decking Platforms | yes | No Breach |
| | EC21/0037 | Large caravan in rear garden | no | No Breach |
| | EC21/0057 | Unauthorised residential caravan | | No Breach |
| | EC21/0083 | Unauthorised Mobile Home | no | No Breach |
| | EC21/0093 | Pop-up Camp Site | yes | No Breach |
| | EC21/0097 | Unauthorised change of use of land from agricultural to residential | no | Further Enforcement Action Taken |
| | EC21/0115 | Unauthorised Signage for Campsite | no | No Breach |
| | EC21/0117 | Unauthorised Camping Site | | Further Enforcement Action Taken |
| | EC21/0119 | Alleged unauthorised change of use of land to camp site | yes | No Breach |
| | EC21/0126 | Camper van sited and lived in on agricultural land | yes | No Breach |
| | EC21/0137 | Alleged sub-division of dwelling house & campsite in garden | no | No Breach |
| | EC21/0140 | Unauthorised Change of use of agricultural land to camp site | yes | No Breach |
| | EC21/0144 | Erection of yurt | no | No Breach |
| | EC21/0145 | Siting of a caravan and camper van and the erection of a timber chalet for resid | no | Further Enforcement Action Taken |
| | EC21/0155 | Change of use to caravan site | no | No Breach |
| | EC21/0157 | Siting of mobile home | no | No Breach |
| | EC21/0165 | Removal of section of hedgebank and creation of access for campsite | yes | No Breach |
| | EC21/0189 | Siting of Caravans for residential use | no | Further Enforcement Action Taken |
| | EC21/0192 | Alleged unauthorised erection of a Shepherd's Hut & Yurt | yes | Further Enforcement Action Taken |
| | EC21/0195 | Change of use of land for siting of shepherd hut as holiday let | no | Further Enforcement Action Taken |
| | EC21/0201 | Alleged unauthorised residential caravan in field | no | Further Enforcement Action Taken |
| | EC21/0205 | Siting of shepherd hut | no | Further Enforcement Action Taken |
| 2022 | EC22/0002 | Siting/Storing of caravan | no | No Breach |

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|-------------|-----------|--|-----|---|
| | EC22/0008 | Change of use of agricultural land to leisure use including day caravan & storag | no | No Breach |
| | EC22/0011 | Breach of condition/all year round occupancy of caravans | no | No Breach |
| | EC22/0014 | Mobile structure built and being used as Air B & B | no | No Breach |
| | EC22/0017 | Material change of use of land for the siting of caravans and boats | no | Further Enforcement Action Taken |
| | EC22/0021 | Unauthorised camper van and caravans on land | no | No Breach |
| | EC22/0031 | Siting of Caravan for residential use | no | Further Enforcement Action Taken |
| | EC22/0038 | Siting of Camping Pod and associated drainage works. | no | Further Enforcement Action Taken |
| | EC22/0107 | Alleged unauthorised use of land as a campsite | yes | No Breach |
| | EC22/0111 | Unauthorised campsite | yes | No Breach |
| | EC22/0115 | Alleged unauthorised use of land as a campsite | yes | No Breach |
| | EC22/0125 | Alleged unauthorised works & decking to caravans | no | No Breach |
| | EC22/0126 | Unauthorised Static Caravan | no | No Breach |
| | EC22/0131 | Installation of Glamping Pod | no | No Breach |
| | EC22/0136 | Siting of static caravan and erection of shed and polytunnel | no | No Breach |
| | EC22/0137 | Siting of caravans and tents | no | Further Enforcement Action Taken |
| 2023 | EC23/0007 | Alleged change of use - siting of a residential caravan | | No Breach |
| | EC23/0010 | Alleged illegal caravan and camping site situated behind property | no | No Breach |
| | EC23/0029 | Unauthorised static caravan to rear | no | No Breach |
| | EC23/0041 | Alleged unauthorised use of garage & pod as holiday/residential accommodation | no | No Breach |
| | EC23/0066 | Siting of two holiday shepherd huts together with associated parking, a storage | no | Further Enforcement Action Taken |
| | EC23/0080 | Alleged unauthorised works on campsite | no | No Breach |
| | EC23/0081 | Alleged breach of Certificated Site regulations relating to permanent structures | yes | No Breach |
| | EC23/0082 | Alleged unauthorised works on campsite | no | No Breach |
| | EC23/0091 | Alleged change of use from touring caravan/camping to seasonal use | no | No Breach |

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|-------------|-----------|---|-----|---|
| | EC23/0095 | Alleged non compliance of certificated campsite including creation of roadway/en | no | No Breach |
| | EC23/0101 | Alleged siting of static caravan on land | | No Breach |
| | EC23/0103 | Alleged unauthorised campsite | yes | No Breach |
| | EC23/0106 | Alleged unauthorised ancillary buildings on certificated campsite | no | No Breach |
| | EC23/0114 | Unauthorised Campsite | yes | No Breach |
| | EC23/0115 | Unauthorised campsite | no | No Breach |
| | EC23/0125 | Installation of residential pod in field adjoining driveway | no | Further Enforcement Action Taken |
| | EC23/0129 | Alleged Unauthorised caravan on agricultural land | no | No Breach |
| | EC23/0142 | Alleged ground clearance works and siting of larger caravans | no | Further Enforcement Action Taken |
| | EC23/0144 | Alleged breach of condition relating to the numbers of static caravans on site | no | No Breach |
| | EC23/0151 | Material change of use of fields from agriculture to a mixed use of agriculture and campsite; installation of electrical hook up points; removal of section of hedgebanks to form openings; construction of track; construction of pond and breach of condition 8 of planning permission NP/08/036. | yes | Further Enforcement Action Taken |
| | EC23/0152 | Alleged unauthorised change of use of farm buildings & land for holiday rental & glamping pods | yes | No Breach |
| | EC23/0154 | Alleged use of steel container/Shepherds hut for accommodation | no | No Breach |
| | EC23/0157 | Alleged Use of site as holiday letting business and letting of Shepherds Hut | yes | Further Enforcement Action Taken |
| 2024 | EC24/0026 | Alleged unauthorised siting of caravans, hot tubs & decking | no | No Breach |
| | EC24/0029 | Alleged unauthorised Siting of Caravan | no | Further Enforcement Action Taken |
| | EC24/0046 | Unauthorised use as campsite | no | No Breach |
| | EC24/0048 | Siting of Static Caravan | no | No Breach |

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|-------------|-----------|--|-----|---|
| | EC24/0074 | Unauthorised use of Shepherds Hut for accommodation | no | No Breach |
| | EC24/0076 | Unauthorised siting of caravan | no | Further Enforcement Action Taken |
| | EC24/0087 | Unauthorised siting of shipping containers and caravans on site | no | No Breach |
| | EC24/0095 | Construction of access track and siting of 4 caravans | yes | Further Enforcement Action Taken |
| | EC24/0103 | Siting of touring caravan for residential use | no | Further Enforcement Action Taken |
| | EC24/0116 | Unauthorised siting of caravan | no | No Breach |
| 2025 | EC25/0001 | Without planning permission, the erection of (i) timber toilet and shower structures, (ii) a timber gazebo with washing-up facility, (iii) children's play equipment and (iv) a large shed. Without planning permission, the making of a material change in the use of the land from agriculture to a mixed use for agriculture and the storage of scrap, non-agricultural material and equipment, shepherd huts, shipping container and children's play equipment | yes | Further Enforcement Action Taken |
| | EC25/0014 | Unauthorised camp site and 2x shepherds hut | yes | No Breach |
| | EC25/0027 | Unauthorised static caravan and shed on agricultural land | no | No Breach |
| | EC25/0028 | Unauthorised siting of pod | no | No Breach |

PCNPA Integrated Assessment Template

Title of what is being Assessed: Measures to control camping and caravan development in the National Park: Article 4 (1) Direction for 28-day camp sites and a Code of Conduct for Exempted Organisations (Stage 3)

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

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

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

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

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

Benefits of undertaking an Integrated Assessment:


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

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

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

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| <p>Name of Strategic Plan, Policy or Decision being assessed</p> | <p>Introducing an Article 4 (1) Direction to enable the management of the caravan and camping sites that do not currently require planning permission when operating for a 28 day period in the manner specified under:</p> <ol style="list-style-type: none"> 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 portaloo are permitted without planning permission. 3. Class B of part 5 of Schedule 2 of the Town and Country Planning Act (General Permitted Development Order) 1995 (as amended) permits the use of a mobile home for not more than 28 days with the siting of the mobile home for no more than 2 nights. |
|---|---|

| | Setting up a voluntary Code of Conduct for Exempted Organisations regarding the selection and operation of sites | | | | | | |
|---|--|-------|-----------|---|---------------|---|--------------------------|
| Department/ Service Area | Planning | | | | | | |
| Officer Responsible for Impact Assessment | Name: Gayle Lister (Principal Planning Officer - Strategic Policy). Stage 1 was undertaken by Martina Dunne M & S Town Planning Ltd on behalf of Sara Morris. Stage 2 was undertaken by Emma Gladstone (Strategic Policy Manager). | | | | | | |
| Responsible Senior Manager | Name: Sara Morris Title: Director of Placemaking, Decarbonisation and Engagement | | | | | | |
| Timetable for the Assessment | <p>Stage 1 Assessment to accompany the National Park Authority Committee papers NPA 1st May. The Stage 1 Assessment was undertaken prior to a 3-month public consultation.</p> <p>The Stage 2 Assessment was undertaken post 3-month public consultation. This was approved by NPA on 11 December 2024.</p> <p>This Stage 3 Assessment is undertaken following the statutory consultation undertaken between 10 January and 21 February 2025 on the proposal to introduce a non-immediate Article 4(1) Direction for 28-day caravan and camping sites and establish a Code of Conduct / Working Protocol for Exempted Organisations.</p> <p>The proposed timescale for introducing the Article 4(1) Direction is as follows:</p> <table border="1"> <thead> <tr> <th>Stage</th> <th>Timescale</th> </tr> </thead> <tbody> <tr> <td>Article 4(1) Direction: Date of Execution</td> <td>December 2024</td> </tr> <tr> <td>Notice of Article 4(1) Direction given with a 6 week period for formal representation</td> <td>January to February 2025</td> </tr> </tbody> </table> | Stage | Timescale | Article 4(1) Direction: Date of Execution | December 2024 | Notice of Article 4(1) Direction given with a 6 week period for formal representation | January to February 2025 |
| Stage | Timescale | | | | | | |
| Article 4(1) Direction: Date of Execution | December 2024 | | | | | | |
| Notice of Article 4(1) Direction given with a 6 week period for formal representation | January to February 2025 | | | | | | |

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|---|--|----------------|--|
| | 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. | May 2025 | |
| | Article 4(1) Direction to take effect | 1 January 2026 | |
| Monitoring and Review of Assessment | See above under Timetable for the Assessment. | | |
| STAGE 2 (POST PUBLIC CONSULTATION): Chief Executive Sign Off – Completed Assessment and Summary/ Recommendations | <p style="text-align: right;">Sign off date:</p> <div style="text-align: center;">  </div> <p style="text-align: right;">23/04/2025</p> | | |

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

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| 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 Article 4(1) direction was signed and sealed by the Authority on 11 December 2024. The Article 4(1) Direction would remove permitted development rights for the use of land for camping and/or caravans for not more than 28 days. Currently permitted development rights allow:</p> <ul style="list-style-type: none"> (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/mobile home to be stationed for no more than two nights for no more than 28 days in a calendar year in total on land of less than 5 acres. |

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. The Article 4(1) Direction would come into effect from 1 January 2026.

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

PERMITTED ON A '28 DAY' SITE

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

NOT PERMITTED ON A '28 DAY' SITE

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

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

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

A Clarification Note was approved by NPA on 26 March 2025 to confirm that an Article 4(1) Direction would not apply to activities that do not involve any form of physical development or change of use, for example, triathlons and filming. The Authority also confirmed that the following would be treated as separate uses and will not need to apply for planning permission even where some element of camping or caravanning is proposed, provided that the camping and caravanning use is considered to be ancillary to the event in nature:

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

Is it new or existing and under review?

New

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

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

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

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

Positive:

- More comprehensive control to assessing the impacts of caravan and camping in the National Park, enabling the Authority **to ensure that proposals are compatible with the strategy of the Pembrokeshire Coast National Park Local Development Plan 2 and the purposes of National Parks**. The purposes of National Parks are to:
 - Conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.
 - Promote opportunities for the public understanding and enjoyment of the special qualities of the Parks.The duty to foster the economic and social well-being of local communities within the National Park is in pursuit of those purposes.
- **A re-focusing of National Park Authority resources** (and those of partner organisations) from being reactive to unauthorised caravan and camping sites to being proactive and building relationships with exemption organisations and other key stakeholders.
- Introducing an Article 4(1) Direction for the entire area would ensure that **the amenities of the National Park's residents**

are protected, including those individuals with protected equality characteristics. It would also ensure that the vision and objectives of a range of relevant strategies and policies, are considered when assessing the appropriateness of the proposed development (in accordance with the local planning policy guidance). **Note** that these policies and strategies have also been subject to a relevant Impact Assessment. Furthermore, it is noted that this method of introducing the Article 4(1) Direction would ensure there is no doubt regarding the geographical area where the intervention would be implemented and this would ensure that the residents of the entire National Park are subject to the same intervention/protection.

- The Code of Conduct would improve dialogue and collaboration with Exempted Organisations regarding the selection and operation of sites in compliance with national regulations, local planning policies and other statutory undertaker requirements.

Negative:

- **Individual landowners** who have operated a 28-day rule site in the past or are intending to do so would be required to apply for planning permission from 1 January 2026. There is a suggestion in the responses received from the consultations that there could be an overall negative impact to small businesses, landowners and farmers. There is the potential that some sites will not operate either because they are refused planning permission or they simply close down because the application process is impracticable for them, with associated financial impacts on that landowner. No application fee is required for those proposals which would have benefited from the 28-day permitted development rule and no charge will be made for pre application advice. Costs may be incurred where a planning consultant is engaged or in time taken away from other activities for individuals preparing and submitting their own planning applications. Guidance is provided by the Authority setting out how proposals would be considered – see Appendix D to the NPA’s Report, 1 May 2024. The Article 4(1) Direction would be implemented without immediate effect which would provide a 12 month period to seek planning permission which is considered to be a sufficient time frame. Applications only become free from the point where an Article 4(1) direction is implemented – the January date allows sufficient time for an application to be processed before the 2026 season. There is also potential for uncertainty for sites that do not apply for or receive permission promptly, with consultation processes meaning that applications will take a minimum of 5 weeks and statutory determination times of 8 weeks, with some applications potentially running over this. The Authority is seeking to minimise this risk by agreeing to prioritise the determination of these application types; and by carefully considering the timing of the confirmation decision and coming into force of the Article 4(1) Direction but it is acknowledged where permissions are granted on a temporary basis there is scope for repeated uncertainty.
- Potential reduction in choice of holiday options and the possibility that authorised sites may be slightly more expensive than

pop up sites.

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

Detail the budget implications relating to it?

Budgetary provision is made for the Article 4(1) Direction within existing budgets. The Authority is not able to legally charge a planning fee for any planning application for a 28 day site received – this would be a free application. Pre-application advice would also be available with no charge. 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(1) 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 . Farming Community. Residents of Pembrokeshire. Visitors to Pembrokeshire. Rangers. Planning/Enforcement Officers. Members.

The consultation has raised concern that lower income families may be affected by the proposal. Whilst it is possible that the implementation of an Article 4(1) Direction may lead to some existing pop up sites being refused permission, the existing extensive provision of pitches (7,500 across the National Park) is considered to provide a good range of choice of different facilities, together with those who will gain permission under an Article 4(1) Direction.

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 |
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| Age | <p>Requirement to submit planning application – potential impact is neutral Introducing and confirming the Article 4(1) 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> | Requirement to submit planning application – potential impact is noted as neutral. |

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| | <p>The requirement to submit a planning application does not impact on a particular age group.</p> <p>In relation to submitting the planning application there would be a period of engagement with those affected which enables any adult age group to participate and engage in the process. This means there would be an opportunity for any person to submit observations on the proposal.</p> <p>This means that the process of introducing an Article 4(1) 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>The Authority will implement the Article 4(1) 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</p> | <p>However two potential impacts were identified from Consultation responses.</p> <p>One raised concerns about the impact of the proposal on groups such as Scouts. The Scout Association is an exempted organisation which provides an opportunity for young people from all backgrounds to experience camping and therefore would not be subject to an Article 4(1) Direction.</p> <p>A second concern was raised that the proposal would impact on young people and families</p> |
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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.

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| | <p>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>This included ensuring Local Development Plan policies do not unlawfully discriminate, identifying any adverse impacts on protected groups, considering how the policy or practice could better advance equality of opportunity and considering whether the policy would affect relations between different groups. Where negative impacts were identified mitigating action or explanatory information was provided.</p> <p>In terms of demonstrating 'due regard' the assessment was considered at distinct stages by Officers and Members in terms of the Preferred Strategy, consultation for the Local Development Deposit Plan and Focussed Changes. The Matters Arising Changes were screened for equality impacts, none of the proposed Matters Arising Changes were considered to result in any negative equality impacts for people with protected characteristics under the Equality Act 2010 and no further assessment was considered necessary.</p> <p>Impacts identified through consultation</p> <p>The statutory consultation on the Article 4 (1) Direction was undertaken for a period of 6 weeks from 10 January to 21 February 2025. The consultation was advertised and circulated to key stakeholders, contacts on the LDP 2 database, known campsite operators and exempted organisations, City, Town and Community Councils, Councillors and NPA Members. The consultation was available to view on the National Park Authority's website. A public notice was placed in the Western Telegraph on 25 December 2024. The PCNPA's</p> | <p>from high deprivation areas who access camping as an affordable holiday. The Authority recognises the positive benefits of camping to provide opportunities to visit and explore the National Park and improve well-being and mental health. Analysis has been undertaken on prices for permitted campsites, those operating under exempted organisations and 28 days. Average costs for a family of 4 for one week on a permitted site is £288, exempted sites are £228 and 28 day sites £199. It is acknowledged that there is a difference in price, however, an Article 4(1) Direction</p> |
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³ <https://www.pembrokeshirecoast.wales/planning/planning-policy/local-development-plan-2/>

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| | <p>Communications team circulated a press release and advertised the consultation on social media platforms. Bilingual notices were advertised at 8 locations across the National Park and the Article 4(1) Direction was available at Llanion and Oriel y Parc. There was press and media attention from BBC Wales, Countryfile, Farmer's Weekly and BBC Radio 4. A total of 216 responses were received via the online questionnaire. 14 responses were submitted by email during the consultation period. This engagement has supported participation from a range of individuals and groups. Information on the previous consultation is documents in the IIA undertaken for Stage 2, which can be viewed here: Report-47-24-Caravan-and-Camping-Consultation-Update.pdf)</p> <p>The consultation did not gather any information from respondents on their age group.</p> <p>Consultation responses raised concerns about the impact of the proposal on groups such as Scouts. The Scout Association is an exempted organisation which provides an opportunity for young people from all backgrounds to experience camping and therefore would not be subject to an Article 4 (1) Direction.</p> <p>Concern was also raised that the proposal would impact on young people and families from high deprivation areas who access camping as an affordable holiday. The Authority recognises the positive benefits of camping to provide opportunities to visit and explore the National Park and improve well-being and mental health. Analysis has been undertaken on prices for permitted campsites, those operating under exempted organisations and 28 days. Average costs for a family of 4 for one week on a permitted site is £288, exempted sites are £228 and 28 day sites £199. It is acknowledged that there is a difference in price, however, an Article 4(1) Direction would not mean the cessation of 28-day sites, simply that owners would require planning permission to operate. The background paper sets out that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or</p> | <p>would not mean the cessation of 28-day sites, simply that owners would require planning permission to operate. The background paper sets out that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would be sufficient choice and opportunity for all to access suitable accommodation. Furthermore, the</p> |
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| | <p>operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would be sufficient choice and opportunity for all to access suitable accommodation. Furthermore, the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission.</p> | <p>Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission.</p> |
| <p>Disability</p> | <p>See previous for Age and requirement to submit planning application</p> <p>Pembrokeshire Council Licence Conditions for a Tent Site/ holiday site for touring caravans include following requirement:</p> <p>The requirement for a planning application would enable particular consideration to be given to the needs of the disabled in the provision made for water points, toilets, washing points and showers.</p> <p>This would have a potential positive impact for people with a disability.</p> <p>Impacts identified through consultation</p> <p>It was commented by one respondent that the requirement for a planning application may cause stress and impact the mental well-being of rural business owners. The clarification note published by the Authority on 26 March 2025 states that officers will provide free pre-application advice to support landowners.</p> | <p>Noted that there is potential for positive impacts for disabled access and provision to be considered as part of a planning application.</p> <p>It was commented by one respondent that the requirement for a planning application may cause stress and impact the mental well-being of rural business owners. The clarification note published by the Authority on 26 March 2025 states that</p> |

| | | officers will provide free pre-application advice to support landowners. | | | | | | | | | | | | | | | | | | | | | | | | |
|---------------------------------|---|---|------------------------|-------|---------------|--|--------|---|--------|---|----------------------------|---------|-------|-----------|-------|---------------------------------|-----|-----|-------|-----|-------------|----|-----|-------|-----|--|
| Gender Reassignment | See previous for Age and requirement to submit planning application | Noted that potential impact is neutral in terms of approach to introduction (as per Age). | | | | | | | | | | | | | | | | | | | | | | | | |
| Pregnancy and Maternity | See previous for Age and requirement to submit planning application | Noted that potential impact is neutral in terms of approach to introduction (as per Age). | | | | | | | | | | | | | | | | | | | | | | | | |
| Race | <p>See previous for Age and requirement to submit planning application</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 neutral in terms of approach to introduction (as per Age).</p> <p>The introduction of a non-immediate effect Article 4(1) Direction for the whole of the Pembrokeshire Coast National Park will not impact on proposals for Gypsy, Traveller and Showpeople sites under Policy 53.</p> |
| Ethnic group (detailed) | 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 | | | | | | | | | | | | | | | | | | | | | | |

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| | <ul style="list-style-type: none"> Local Development Plan 2 has Policy 53 Gypsy, Traveller and Showpeople Sites: <p>Proposals for Gypsy, Traveller and Showpeople sites will be permitted where: a) The applicant has demonstrated there are no suitable pitches available within existing authorised sites or land available within existing settlement limits; and b) the site is well located to serve the needs of Gypsy, Travellers or Showpeople including the need to access local services; and c) the site has good access to a public road which is safe and direct; and d) the site is suitable for the development and on site services and facilities can be adequately provided; and e) amenity issues for both residents on the site and neighbouring properties are adequately addressed; and f) the proposal does not cause significant visual intrusion, is sensitively sited in the landscape and satisfactory landscaping is provided</p> <p>4.299 in the LDP2 notes “The Pembrokeshire County Council 2015 Gypsy Traveller Accommodation Need Assessment (2015 GTANA) sets out the need for Gypsy and Traveller sites and Travelling Showpeople’s yards in Pembrokeshire.147 No need has been identified in the Pembrokeshire Coast National Park. It is recognised that need for a Gypsy and Travellers site may arise outside of the findings of the Gypsy and Traveller Needs Assessment. Where this is the case the Authority will consider applications on a case by case basis in line with the criteria set out above and, in accordance with Circular 005/2018 ‘Planning for Gypsy, Traveller and Showpeople Sites’</p> <p>Impact: The introduction of a non-immediate effect Article 4(1) Direction for the whole of the Pembrokeshire Coast National Park would not impact on proposals for Gypsy, Traveller and Showpeople sites under Policy 53.</p> | |
| Religion or Belief | See previous for Age and requirement to submit planning application | Noted that potential impact is neutral in terms of approach to |

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| | | introduction (as per Age). |
| Sex | See previous for Age and requirement to submit planning application | Noted that potential impact is neutral in terms of approach to introduction (as per Age). |
| Sexual Orientation | See previous for Age and requirement to submit planning application | Noted that potential impact is neutral in terms of approach to introduction (as per Age). representations received. |
| Marriage and Civil Partnership | See previous for Age and requirement to submit planning application | Noted that potential impact is neutral in terms of approach to introduction (as per Age). |
| Socio economic disadvantage and inequalities of outcome (Equality Act 2010 context) | <p>Introducing and confirming the Article 4(1) 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(1) 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. | <p>Feedback from Exploratory Workshops in February 2024 provided an opportunity to develop a Table identifying pros and cons which was attached to the stage 1 Assessment. It has also provided an opportunity to consider how to deal</p> |

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| | <p>➤ require seeking the opinion of those who are affected.</p> <p>It is also intended, if progressed, to implement the Article 4(1) Direction across the Local Planning Authority area meaning that the implementation would be the same with the National Park.</p> <p>The Article 4(1) Direction, however, is not in place in the neighbouring local planning authorities of Pembrokeshire County Council, Ceredigion or Carmarthenshire, so there is potential for perceived economic disadvantage amongst landowners who could potentially operate a 28 day site within the National Park.</p> <p>The Authority prepared a Pros and Cons Table of Permitted Development Rights as they operate which is attached to this IIA. Stakeholders were provided an opportunity to comment at two exploratory workshops in February 2024.</p> <p>The table in the 'Economic' Row and the 'Visitor' row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park. Both positive and negative implications are identified.</p> <p>The Article 4(1) Direction would require the submission of a planning application. Consideration of the planning requirements would allow potentially for the positives to continue and improve, and the cons mitigated.</p> <p>No application fee is required for those proposals which would have benefited from the 28- day permitted development rule. Costs may be incurred where a planning consultant is engaged or in the time taken for an individual to prepare a planning application.</p> | <p>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 a Voluntary Code of Practice and a Complaints resolution procedure. Exemption Organisations permitted development rights were originally also being considered for an Article 4(1) Direction.</p> <p>For 28-day sites the requirement to submit a planning application</p> |
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| | <p>The assessment of a planning application for the 28 day use of land for camping could, however, lead to a refusal of planning permission where the cons could not be addressed satisfactorily. The planning system in Wales plays a crucial role in managing land use and development. Its purpose is to ensure the efficient and sustainable use of land while balancing the needs of development and conservation. This is particularly important in a National Park. Applicants can appeal the Authority's decision.</p> <p>The statutory consultation received 216 responses to the online questionnaire and 14 representations by email. The questionnaire received a significant majority, 180 respondents, 83% do not support the introduction of the Article 4 (1) Direction. One key theme that emerged from the responses was concern about barriers for businesses, particularly economic impacts and potential reduction in income for small and medium enterprises, landowners and farmers. Concern was also expressed about the wider economic impact on the local tourism sector and services. Respondents raised concern and suggested that an economic impact assessment should be conducted before implementing the Article 4(1) Direction.</p> <p>The previous consultation undertaken during the summer 2024 received majority support for the Article 4(1) Direction, although some consultation responses raised some concern from respondents that 28 day sites are an income generator for farmers and small-holders. The Country Landowners Association Cymru highlighted issues such as:</p> <ul style="list-style-type: none"> ▪ Burdens on rural business in Wales ▪ The need to ensure that permissions granted are permanent if these options are progressed. ▪ With the underfunding of National Park Authorities then this is what should be addressed to allow the planning authority to carry out its planning function rather introducing additional controls. | <p>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 from 1 May 2024 - A no fee requirement for what are 28-day site proposals - A lead in time for introducing the Article 4(1) Direction to allow applicants an adjustment time to get their planning permissions in place (e.g.12 months) - The Authority will fast track applications received due to |
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| | <p>Friends of the National Park supported greater control being exercised but cautioned against placing an additional burden on landowners</p> <p>It was also suggested to provide a lead in time to applying for permission and fast-tracking applications.</p> <p>The Authority does propose the undertaking the following measures to reduce and potentially mitigate potential economic disadvantage by:</p> <ul style="list-style-type: none"> - Using the Article 4(1) Direction procedure which has a non immediate effect and would provide a 12 month lead in time prior to implementation to give land owners and site operators sufficient time to find out the requirements of preparing and submitting a planning application. Consideration has been giving to delaying the implementation start date, but this would result in not being able to determine planning applications with no charge. - Establish a working protocol for Planning Officers to fast track applications which are received due to the Article 4 Direction for campsites seeking to operate for up to 28 days. - Officers will consider giving permanent permissions where appropriate. <p>Responses received during the statutory consultation period raised concerns that loss of 28-day sites would result in a loss of choice of holiday options particularly for those on lower incomes. Analysis has been undertaken on prices for permitted campsites, those operating under exempted organisations and 28 days. Average costs for a family of 4 for one week on a permitted site is £288, exempted sites are £228 and 28 day sites £199. It is acknowledged that there is a difference in price, however, an Article 4 (1) Direction would not mean the cessation of 28-day sites, simply that owners would require planning permission to operate.</p> | <p>the Article 4(1) Direction (see Appendix E)</p> <ul style="list-style-type: none"> - Permanent permissions will be considered where appropriate <p>Responses received during the statutory consultation period raised concerns that loss of 28-day sites would result in a loss of choice of holiday options particularly for those on lower incomes. Analysis has been undertaken on prices for permitted campsites, those operating under exempted organisations and 28 days. Average costs for a family of 4 for one week on a permitted site is £288, exempted sites are</p> |
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| | | £228 and 28 day sites £199. It is acknowledged that there is a difference in price, however, an Article 4(1) Direction would not mean the cessation of 28-day sites, simply that owners would require planning permission to operate. |
| 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 prepared a Pros and Cons Table of Permitted Development Rights as they operate – attached to this Assessment. Stakeholders were provided an opportunity to comment at two exploratory workshops and during a consultation during the summer 2024.</p> <p>The table in the ‘Economic’ Row and the ‘Visitor’ row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park.</p> <p>Both positive and negative implications are identified. Were an Article 4(1) 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</p> | Although the proposal would impact on people’s opportunities to access the Park through 28 days and unregulated sites or potentially access smaller/quieter sites it has potential to help improve wider issues relating to concerns raised around public/ environmental health in terms of risk |

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| | <p>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. Concerns were raised regarding those 28-day sites that do not provide toilet facilities where visitors are directed to public toilets or within local community facilities and the resultant issues where these facilities are closed or are not equipped to deal with extra use.</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>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(1) Direction to be confirmed then this does not preclude applicants gaining planning permission for their proposal. This would allow</p> |
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| | <p>It is also recognised that 28-day sites may offer cheaper camping opportunities for lower income families to enjoy the Pembrokeshire Coast National Park and therefore any loss of campsites may reduce such opportunities in the circumstances that planning permission were refused.</p> <p>Impact: Although an Article 4(1) 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(1) 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>Impacts identified through consultation</p> <p>It was commented by one respondent that the requirement for a planning application may cause stress and impact the mental well-being of rural business owners. The clarification note published by the Authority on 26 March 2025 states that officers will provide free pre-application advice to support landowners.</p> | <p>potentially for the positives to continue and improve, and the cons mitigated</p> <p>It was commented by one respondent that the requirement for a planning application may cause stress and impact the mental well-being of rural business owners. The clarification note published by the Authority on 26 March 2025 states that officers will provide free pre-application advice to support landowners.</p> |
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Public Sector Equality Duty Considerations

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| <p>How does the Strategic Plan, Policy or Decision being assessed promote equality of opportunity?</p> | <p>The consultation on Camping and Caravan Development in the National Park has allowed people the opportunity to influence what is happening in their community – see Group focused impact assessment above. The Article 4(1) Direction for 28 day use of land for camping would mean that planning permission is required, which enables people the opportunity to comment on applications. 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. Some responses to the consultation have raised grievances that 28-day sites undercut permitted / certificated sites who make significant investments in campsite infrastructure.</p> <p>The proposals would go towards setting up a more even playing field.</p> |
| <p>How does the Strategic Plan, Policy or Decision promote good relations?</p> | <p>Consultation and engagement sessions held during 2024 on the proposals has enabled the National Park Authority to be transparent on the issues regarding camping and caravan development and enabled the authority to build relations with stakeholders and the public. A further consultation period was held in early 2025 on the Article 4(1) Direction to withdraw permitted development rights for the 28 day use of land for camping. This consultation received 216 responses to the questionnaire and a further 14 responses were made by email. The responses to the questionnaire received a significant level of opposition, with 180 respondents, 83% not supporting the introduction of the Article 4(1) Direction. The questionnaire revealed a level of misunderstanding about the application of the Article 4(1) Direction and the Authority published a clarification note on the application of the Article 4(1) Direction on 26 March 2025. Officers are preparing a Report of Consultation to provide an officer response to the issues raised in the consultation. One of the main issues raised is concern regarding the potential negative economic impact on landowners and farmers.</p> <p>The Authority has identified a number of measures to reduce and potentially mitigate potential economic disadvantage and promote good relations:</p> <ul style="list-style-type: none">• Using the Article 4(1) Direction procedure which has a non-immediate effect to provide a 12-month lead in time prior to implementation. The Article 4(1) Direction was agreed on 11 |

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| | <p>December 2024 and would come into effect on 1 January 2026. This timescale would give land owners and site operators sufficient time to find out the requirements of preparing and submitting a planning application. This timescale also provides sufficient time for applications to be submitted free of charge from 1 January 2026 and determined by planning officers prior to the main summer season when 28 day sites would operate.</p> <ul style="list-style-type: none"> • Officers will provide free pre-application advice for prospective applicants • Officers have prepared a working protocol for Planning Officers to fast track applications which are received due to the Article 4(1) Direction for campsites seeking to operate for up to 28 days. • Officers will consider giving permanent permissions where appropriate. • Officers anticipate there will be a number of applications received in January 2026. Where additional resources are required to determine applications, enforcement officers and the strategic policy team can provide additional resource if required. <p>When the Article 4(1) Direction comes into force planning applications would be required for 28 day camp sites which would require the national park authority to consult key stakeholders and advertise the planning application. All representations made would be considered by the authority which builds good relations.</p> <p>The proposal should enable well planned campsites in accessible locations, avoiding those that cause amenity concerns for neighbours.</p> <p>When the Authority devises a Code of Conduct /Working Protocol with Exempted Organisations, this would enable the authority to be proactive through both the biannual meetings and through pre-application advice etc.</p> <p>The refusal of a planning permission or misinterpreting the proposal as a complete stop to caravan and camping could cause bad feeling. There can also be tensions with local communities if planning permission is granted, despite concerns being raised from neighbouring residents.</p> |
| Does this Strategic Plan, Policy or Decision have the potential to cause unlawful | The main aim of the Article 4(1) 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. |

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| direct or indirect discrimination? | |
| 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 and encourages participation. Currently 28-day site proposals do not require public engagement. It is not the intention of an Article 4(1) Direction to limit 28 day sites but provide information on where the sites are operating and ensure they are located in appropriate locations in the National Park which have an acceptable impact on the landscape, environment and communities. |
| Will any of what is being assessed by wholly or partly carried by contractors or in partnership with other organisations. If yes, what steps will you take to comply with the General Equality Duty in regard to procurement and/ or partnerships? | <p>Yes. M&S Planning Ltd have worked with the Authority in holding workshops, preparing the evidence paper and Report of Consultations for the consultation undertaken on options during the summer 2024.</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

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| Do you have any data/ engagement gaps? | <p>A Background Paper was prepared to accompany the formal consultation and was updated to accompany the consultation on the Article 4(1) Direction undertaken in early 2025.</p> <p>Responses received to the consultation undertaken from 29 May to 20 September 2024 have been considered. 120 consultation responses were received via the online questionnaire and a number of responses were received via email and post from statutory consultees, other organisations and</p> |
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| | <p>the public. The responses received have been considered by Officers and a Report of Consultation has been prepared. The Report of Consultation was reported to National Park Authority to inform their decision in December 2024 on whether to progress with an Article 4(1) Direction to withdraw permitted development rights for the 28 day use of land for camping and caravans.</p> <p>A consultation was held between 10 January and 21 February 2025 and a report of consultation will be reported to NPA in May 2025. This was the only statutory consultation period that is required by legislation. Concerns have been raised during this consultation period that the previous consultation period was not sufficient, not widely advertised and the response rate was not representative of the Pembrokeshire population (120 responses received). The previous consultation was open for 3 months and advertised in local press, social media and at various agricultural shows, including the County Show, during the summer, where officers were also available to answer any questions.</p> <p>216 responses were received via the questionnaire to the statutory consultation in 2025. This consultation received significant press and media attention and as a result the response rate was higher than the previous consultation. The response rates to both consultation is considered by officers to be a reasonable response rate for a consultation that has an impact on a limited number of the population.</p> <p>It is not considered possible to contact all people who may be impacted by the proposal to implement an Article 4(1) Direction and a significant range of advertising and notification procedures were undertaken to ensure people had an opportunity to respond.</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

Equality Summary/ Recommendation from Assessment:

The potential impact is generally positive for members of the public, however, the consultation did generate some comments that 28 day sites are an income generator for farmers, small-holders and rural businesses and there was concern that an Article 4 (1) Direction would restrict farmers from generating an additional income. The Report of Consultation responds to comments received.

There is the potential that some sites will not operate either because they are refused planning permission or they simply close down because the application process is impracticable for them, with associated financial impacts on that landowner. There may be a reduction in the number of sites overall. There is also the possibility that there is a slightly higher cost to some families of staying in authorised sites who have invested in additional facilities. There is also potential for uncertainty for sites that do not apply for or receive permission promptly, with consultation processes meaning that applications will take a minimum of 5 weeks and statutory determination times of 8 weeks, with some applications potentially running over this. The Authority is seeking to minimise this risk by agreeing to prioritise the determination of these application types; and by carefully considering the timing of the confirmation decision and coming into force of the Article 4(1) Direction but it is acknowledged where permissions are granted on a temporary basis there is scope for repeated uncertainty.

The Article 4(1) Direction would not charge for planning applications and free pre-application advice would also be provided by officers. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations. It is also acknowledged that there would be a cost implication to landowners if they appointed a planning agent to prepare and submit an application on the applicant's behalf.

Overall, whilst it is difficult to estimate the precise outcomes of the Article 4(1) Direction, there is likely to be some negative economic impact on a limited number of landowners.

Some potential mitigation measures were raised in the consultation:

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

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

The process of introducing an Article 4(1) Direction would:

- reduce the probability of the discrimination caused when members of the public do not receive information about changes that affect them or who feel that they do not have the ability to influence.
- Include consulting and seek the opinion of those who might be affected.
- Mean that there is better control of unregulated caravan and camping sites thus ensuring that:
 - the amenity of neighbouring properties and local communities are more fully considered.
 - Remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services.⁴

There are also financial impacts for the National Park Authority, without additional funding and potentially impacts for other applicants for planning permission if delays in the planning system are caused. These are likely to be minimised, with the identification of resource available to deal with planning applications and with the previously agreed prioritisation of these application types.

The extent of any detrimental impact should be set against the benefits of higher standards for the environment and a better visitor experience.

Overall, the economic impact is not considered likely to be of a scale to materially impact on the wider economy of the National Park.

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:

The potential impact is generally positive for members of the public, however, the consultation did generate some comments that 28 day sites are an income generator for farmers, small-holders and rural businesses and there was concern that an Article 4(1) Direction would restrict farmers from generating an additional income. The Report of Consultation responds to comments received.

There is the potential that some sites will not operate either because they are refused planning permission or they simply close down because the application process is impracticable for them, with associated financial impacts on that landowner. There may be a reduction in the number of sites overall. There is also the possibility that there is a slightly higher cost to some families of staying in authorised sites who have invested in additional facilities. There is also potential for uncertainty for sites that do not apply for or receive permission promptly, with consultation processes meaning that applications will take a minimum of 5 weeks and statutory determination times of 8 weeks, with some applications potentially running over this. The Authority is seeking to minimise this risk by agreeing to prioritise the determination of these application types; and by carefully considering the timing of the confirmation decision and coming into force of the Article 4(1) Direction but it is acknowledged where permissions are granted on a temporary basis there is scope for repeated uncertainty.

The Article 4(1) Direction would not charge for planning applications or pre application advice. There may be costs to comply with other requirements to operate a camping site safely and in accordance with regulations. It is also acknowledged that there would be a cost implication to landowners if they appointed a planning agent to prepare and submit an application on the applicant's behalf or when they have to spend time in preparing an application.

Some potential mitigation measures were raised in the consultation:

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

It is acknowledged that 28 day sites may offer a more viable camping holiday alternative to lower income families, and that any reduction in the number of sites may reduce the choice of sites to such families. However, an Article 4(1) Direction would not necessarily reduce the number of sites as it would not preclude operators of such sites gaining planning permission. The

background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate.

Overall, whilst it is difficult to estimate the precise outcomes of the Article 4(1) Direction, there is likely to be some negative economic impact on a limited number of landowners.

On balance it is recommended that the Article 4(1) Direction would be of benefit in terms of addressing socio economic disadvantage and inequality because introducing and confirming the Article 4(1) 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(1) 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 G to the Committee's covering report for the draft.
- A no fee requirement for what are 28-day site proposals
- Free pre-application consultation
- A lead in time for introducing the Article 4(1) Direction to allow applicants an adjustment time to get their planning permissions in place (e.g. 12 months)

There are also financial impacts for the National Park Authority, without additional funding and potentially impacts for other applicants for planning permission if delays in the planning system are caused. These are likely to be minimised, with the identification of resource available to deal with planning applications and with the previously agreed prioritisation of these application types.

The extent of any detrimental impact should be set against the benefits of higher standards for the environment and a better visitor experience.

Overall, the economic impact is not considered likely to be of a scale to materially impact on the wider economy of the National Park.

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

Welsh Language

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

Consultation

The process of preparing and consulting on the options to control Camping and Caravan Development in the National Park has been carried out in accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011) with all information available bilingually. No responses were received in Welsh. No concerns or issues regarding the Welsh language have been raised by respondents to the first consultation undertaken during the summer of 2024.

In response to the consultation on the Article 4(1) Direction undertaken from 10 January to 21 February 2025. One response to the questionnaire was received in Welsh. The questionnaire asked the following questions with regard to the Welsh language:

Question 7: What, in your opinion, would be the likely effects of the Article 4 Direction on the Welsh language? We are particularly interested in any effects on opportunities to use the Welsh language and on treating the Welsh language less favourably than English.

Question 8: Do you think there are opportunities to promote any positive effects?

Question 9: Do you think there are opportunities to mitigate any harmful effects?

Question 10: In your opinion, could the proposed actions be formulated or changed so as to:

- have positive effects, or more positive effects on using the Welsh language and not treating the Welsh language less favourably than the English, or
- mitigate any negative effects on using the Welsh language and on treating the Welsh language less favourably than English?

A detailed analysis and officer's response is provided in the Report of Consultation. The consultation generated significant opposition to the Article 4(1) Direction with 180 respondents out of 216 respondents (83%) did not support the introduction of the Article 4(1) Direction.

With regard to the questions relating to the impact on the Welsh language respondents commented

- It would impact negatively on young and low income families wanting to attend the Eisteddfod.
- A number of respondents raised concern about the reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture.
- A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local families and Welsh speaking communities. It was also commented by one respondent that the requirement for a planning application may cause stress and impact the mental well-being of rural business owners.
- One comment criticised the authority for not conducting a full Welsh Language Impact Assessment and that it needs to be demonstrated how negative impacts will be mitigated.

Welsh Language area of influence focused impact approach

| Area | Do you have evidence or reason to believe that what is being assessed may impact on the Welsh language in any of the following areas? Consider both positive and negative impacts. Including identifying any opportunities to increase positive impacts. | Response/ Mitigation/ Any additional actions needed |
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| Number of Welsh Speakers | The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy | Positive that an Article 4(1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas. This would enable suitable mitigation measures to be identified. Where development would result in an unacceptable adverse |

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| | <p>also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives.</p> <p>Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> <p>There is potential for both positive and negative impacts on the use of the Welsh language with the Article 4(1) Direction. The additional control could have a negative impact upon the economy which could result in fewer jobs in the tourism sector and therefore have an impact on the number of jobs available for local Welsh speaking people. Conversely, additional controls could result in fewer tourists visiting the area which could protect the Welsh language and culture in the area.</p> <p>Consultation Responses</p> <p>With regard to the questions relating to the impact on the Welsh language respondents commented it would impact negatively on young and low income families wanting to attend the Eisteddfod. The Authority published a clarification note on 26 March 2025 stating that camping and caravan use connected to permitted temporary events, such as weddings, festivals will not require planning permission. The Authority will also provide free pre-application advice.</p> <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local</p> | <p>effect on the Welsh Language planning permission could be refused under Policy 13.</p> <p>The clarification note approved on 26 March 2025 states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.</p> <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local families and Welsh speaking communities. Officers consider that the Article 4(1) Direction does not prevent planning permission, but</p> |
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| | <p>families and Welsh speaking communities. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers have liaised with other authorities who operate an Article 4 Direction for 28 day camping and caravan sites. In the Gower, an Article 4 Direction has been in operation since 1977 and officers receive a low level of applications for the operation of 28 day sites. For example, two applications were made in the Gower for 28 day sites during the last year, of which one was refused. Officers from the Gower also provided anecdotal evidence that where proposed sites had a negative visual impact on the landscape of the National Park, officers were able to work with landowners and identify more suitable land within their ownership which had an acceptable visual impact.</p> <p>A number of respondents raised concern about the reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there is a number of sites operating in the National Park which would</p> | <p>requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission.</p> <p>Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there is a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.</p> |
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| | provide sufficient choice and opportunity for all to access suitable accommodation. | |
| Welsh Language Transmission | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives.</p> <p>Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13</p> <p>Consultation Responses</p> <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local families and Welsh speaking communities. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile</p> | <p>Positive that an Article 4(1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas. This would enable suitable mitigation measures to be identified. Where development would result in an unacceptable adverse effect on the Welsh Language planning permission could be refused under Policy 13.</p> <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4 Direction, thereby having a negative impact on local families and Welsh speaking communities.</p> |

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| | <p>home sites to obtain planning permission. Officers have liaised with other authorities who operate an Article 4 Direction for 28 day camping and caravan sites. In the Gower, an Article 4 Direction has been in operation since 1977 and officers receive a low level of applications for the operation of 28 day sites. For example, two applications were made in the Gower for 28 day sites during the last year, of which one was refused. Officers from the Gower also provided anecdotal evidence that where proposed sites had a negative visual impact on the landscape of the National Park, officers were able to work with landowners and identify more suitable land within their ownership which had an acceptable visual impact.</p> | <p>Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission.</p> |
| <p>Opportunities to learn Welsh or Study through medium of Welsh</p> | <p>Consultation Responses</p> <p>With regard to the questions relating to the impact on the Welsh language respondents commented it would impact negatively on young and low income families wanting to attend the Eisteddfod. The Authority published a clarification note on 26 March 2025 stating that camping and caravan use connected to permitted temporary events, such as weddings, festivals will not require planning permission. The Authority will also provide free pre-application advice.</p> <p>A number of respondents raised concern about the reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers do not consider the number of refusals of planning permission for new campsites or</p> | <p>The clarification note approved on 26 March 2025 states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.</p> <p>Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area. The</p> |

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| | <p>caravan parks would significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there were approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.</p> | <p>background paper identifies that in 2023 there were approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.</p> |
| Use of Welsh-language services | See above | See above |
| Social Use of Welsh | See above | See above |
| Welsh in the workplace | Authority will continue to deliver planning service in line with Welsh Language Standards. | Authority will continue to deliver planning service in line with Welsh Language Standards. |

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| <p>Visibility of Welsh Language</p> | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> <p>A number of respondents raised concern about the reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however,</p> | <p>Positive that an Article 4(1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas. This would enable suitable mitigation measures to be identified. Where development would result in an unacceptable adverse effect on the Welsh Language planning permission could be refused under Policy 13.</p> <p>Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an</p> |
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| | <p>these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.</p> | <p>exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.</p> |
| <p>Efforts to protect and promote the Welsh language</p> | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> | <p>Positive that an Article 4(1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas. This would enable suitable mitigation measures to be identified. Where development would result in an unacceptable adverse effect on the Welsh Language planning permission could be refused under Policy 13.</p> <p>The clarification note approved on 26 March 2025</p> |

Consultation Responses

With regard to the questions relating to the impact on the Welsh language respondents commented it would impact negatively on young and low income families wanting to attend the Eisteddfod. The Authority published a clarification note on 26 March 2025 stating that camping and caravan use connected to permitted temporary events, such as weddings, festivals will not require planning permission. The Authority will also provide free pre-application advice.

A number of respondents raised concern about the reduced opportunities for visitors to the area that would be exposed to the Welsh language, folklore and culture. Officers consider that the Article 4 (1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers do not consider the number of refusals of planning permission for new campsites or caravan parks would significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would provide sufficient choice and opportunity for all to access suitable accommodation.

states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.

Officers do not consider the number of refusals of planning permission for new campsites or significantly impact on opportunities for visitors to stay in the area. The background paper identifies that in 2023 there was approximately 7,500 caravan and tent pitches in the National Park with either planning permission or operating under an exemption certificate. There is also a significant number of sites using the 28 day permitted development right, however, these sites are not quantifiable. It is considered that there are a number of sites operating in the National Park which would

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| | | provide sufficient choice and opportunity for all to access suitable accommodation. |
| Social, economic and cultural infrastructure of Welsh Speaking Communities/ Language Planning | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> <p>There is potential for both positive and negative impacts on the use of the Welsh language with the Article 4(1) Direction. The additional control could have a negative impact upon the economy which could result in fewer jobs in the tourism sector and therefore have an impact on the number of jobs available for local Welsh speaking people. Conversely, additional controls could result in fewer tourists visiting the area which could protect the Welsh language and culture in the area.</p> | <p>Positive that an Article 4(1) Direction would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas. This would enable suitable mitigation measures to be identified. Where development would result in an unacceptable adverse effect on the Welsh Language planning permission could be refused under Policy 13.</p> <p>The clarification note approved on 26 March 2025 states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.</p> |

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| | <p>Consultation Responses</p> <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local families and Welsh speaking communities. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission. Officers have liaised with other authorities who operate an Article 4 Direction for 28 day camping and caravan sites. In the Gower, an Article 4 Direction has been in operation since 1977 and officers receive a low level of applications for the operation of 28 day sites. For example, two applications were made in the Gower for 28 day sites during the last year, of which one was refused. Officers from the Gower also provided anecdotal evidence that where proposed sites had a negative visual impact on the landscape of the National Park, officers were able to work with landowners and identify more suitable land within their ownership which had an acceptable visual impact.</p> | <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local families and Welsh speaking communities. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission.</p> |
| <p>Use of Welsh in the digital and technological field</p> <p>[</p> | <p>Authority will continue to deliver planning service in line with Welsh Language Standards.</p> | <p>Authority will continue to deliver planning service in line with Welsh Language Standards.</p> |
| <p>Welsh Language Standards</p> | <p>The process of preparing and approving the Article 4(1) Direction has been undertaken in accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011 and the Welsh Language Standards Regulations (No.1) 2015)</p> | <p>The Authority has accorded with the Welsh Language Standards</p> |

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| Other considerations | <p>Consultation Response</p> <p>It was also commented by one respondent that the requirement for a planning application may cause stress and impact the mental well-being of rural business owners. The clarification note published by the Authority on 26 March 2025 states that officers will provide free pre-application advice to support landowners.</p> <p>One comment criticised the authority for not conducting a full Welsh Language Impact Assessment and that it needs to be demonstrated how negative impacts will be mitigated. This assessment forms the Welsh Language Impact Assessment</p> | <p>The clarification note published by the Authority on 26 March 2025 states that officers will provide free pre-application advice to support landowners.</p> <p>This assessment forms the Welsh Language Impact Assessment</p> |
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Welsh Language Areas of Influence Considerations

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| <p>How does what is being assessed promote numbers and/ or percentages of Welsh speakers/ use of Welsh language.</p> | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> <p>The clarification note approved on 26 March 2025 states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.</p> |
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| <p>How does what is being assessed support opportunities to promote the Welsh language</p> | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> <p>The clarification note approved on 26 March 2025 states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.</p> |
| <p>How does what is being assessed support compliance with Welsh language Standards and the treating of the Welsh language, no less favourably than the English language.</p> | <p>The process of preparing and approving the Article 4(1) Direction has been undertaken in accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011 and the Welsh Language Standards Regulations (No.1) 2015)</p> <p>Authority will continue to deliver planning service in line with Welsh Language Standards.</p> |
| <p>How does what is being assessed support the sustainability of Welsh language in communities</p> | <p>The Article 4(1) Direction would bring sites within the framework of the Local Development Plan. The Article 4(1) direction would therefore have a potential positive impact on the Welsh Language in Welsh Language Sensitive Areas as applications would be considered against all policies within the LDP, including consideration under Policy 13 Development in Welsh Language-Sensitive areas. The adopted LDP has a policy to consider the impact of 'Development in Welsh Language Sensitive Areas (Policy 13). Developments where the site is over 1 hectare in a Welsh Language Sensitive Area will be subject to a Language Impact Assessment, setting out the measures to be taken to protect, promote and enhance the Welsh language. This policy also enables mitigation measures to be identified to reduce or eliminate</p> |

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| | <p>potential adverse impacts of development. This may include features such as bilingual signage or Welsh language and cultural awareness initiatives. Developments which would result in an unacceptable adverse effect on the Welsh Language are not permitted under Policy 13.</p> <p>A few comments suggested that Welsh landowners and young people might leave the area due to the inability to operate their businesses or farmers wishing to diversify as a result of the Article 4(1) Direction, thereby having a negative impact on local families and Welsh speaking communities. Officers consider that the Article 4(1) Direction does not prevent planning permission, but requires operators of 28 day camping, caravan or mobile home sites to obtain planning permission.</p> |
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Data/ Engagement Gaps

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| Do you have any data/ engagement gaps? | <p>A Background Paper was prepared to accompany the formal consultation and comment invited on the data.</p> <p>The consultation undertaken in 2025 received a number of responses that stated that the Authority had insufficient evidence to support the need for an Article 4(1) direction. In response, the Authority has added some specific case study examples of 28 day sites operating in the National Park and these highlight issues regarding landscape and visual impact, highway access, impacts on protected sites and protected species, operational development and impact on scheduled Monuments.</p> <p>Public consultation and engagement was undertaken over a period in excess of three months from 29 May to 20 September. In terms of public consultation, notification via email or letter were sent to contacts on the Local Development Plan mailing list, planning agents and those who have already been contacted through meetings and workshops along with County Councillors in the National Park, key stakeholders, known campsites operating under exempted organisations, campsites operating with planning permission and exempted organisations. The consultation was available to view on the Authority's website and publicity of the consultation was undertaken with a press release and promoted on social media platforms. During the consultation period, officers held a</p> |
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| | <p>presentation and engagement event online for any members of the public or stakeholders to attend and a separate engagement event for City, Town and Community Councils. Officers also raised awareness and engaged with the public at local shows at Fishguard, Nevern, Pembroke and the County Show. Officers also raised awareness of the consultation at the Planning Agents forum meeting. Respondents were invited to complete a questionnaire online or submit comments in writing via letter or email. The Authority does not consider there to be any engagement gaps.</p> <p>A further consultation was held on the introduction of the Article 4(1) Direction in early 2025 and 216 responses were received via the questionnaire and a further 14 emails of representation were received.</p> <p>The response rates to both consultations is considered by officers to be a reasonable response rate for a consultation that has an impact on a limited number of the population, however, it is not representative of the whole population.</p> <p>References were made to Welsh Language in the responses and these have been considered within the above assessment of impact.</p> |
| <p>If yes, can further information be obtained or additional engagement to fill any of these data gaps?</p> | <p>No further engagement is considered necessary as two consultations have been undertaken with significant advertisement, notification and press interest.</p> |

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

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| <p>Welsh Language Summary/ Recommendation from Assessment:</p> <p>The process of preparing and approving the Article 4(1) Direction has been undertaken accordance with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011) and the Welsh Language Standards Regulations (No.1) 2015).</p> |
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The proposal would bring sites within the framework of the Local Development Plan for consideration under Policy 13 Development in Welsh Language-Sensitive areas. This would enable the impact of development on the Welsh language to be considered and suitable mitigation measures can be identified. Developments which would result in an unacceptable adverse effect on the Welsh Language could be refused permission under Policy 13.

The clarification note approved on 26 March 2025 states that camping and caravan use connected to permitted temporary events, such as the Eisteddfod will not require planning permission. The Authority will provide free pre-application advice.

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 |
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| Natural Environment - Biodiversity | <p>The consultation responses highlighted concern about impacts on the environment in terms of pollution and impacts on flora, fauna, soil etc. The consultation responses also highlighted a lack of awareness regarding the environmental impacts the operation of sites can have.</p> <p>Introducing and confirming the Article 4(1) Direction would enable planning control which means that mandatory steps must be taken to be able to change use, i.e. a proposal must obtain planning permission from the Local Planning Authority.</p> | This is a potentially positive outcome. |

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| | <p>The framework of the Local Development Plan 2 would be used to assess proposals, in particular Policy 10 Sites and Species of European Importance, Policy 11 Nationally Protected Sites and Species and Policy 12 Local Areas of Nature Conservation.</p> <p>The Authority has also prepared a Pros and Cons Table of Permitted Development Rights as they operate – attached to this Assessment. Stakeholders were provided an opportunity to comment at two exploratory workshops. The ‘Environment’ row of the table provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park. Both positive and negative implications are identified in the table. An Article 4(1) Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.</p> | |
| <p>Natural Environment – Air, Land and Water Quality</p> | <p>See above response. Please also refer to the ‘Economic’ row in relation to agricultural land quality and Policies of the Local Development Plan. Please refer to Policy 9 Light Pollution, Policy 12 which deals with Sites of Geological Interest, Policy 29 Sustainable Design, Policy 30 Amenity, Policy 31 Minimising Waste, Policy 32 Surface Water Drainage, Policy 34 Flooding and Coastal Inundation.</p> <p>Linked to the introduction of an Article 4(1) 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> |

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| <p>Natural Environment – Access to Open and Green/ Blue Spaces</p> | <p>Stakeholders were provided with an opportunity to comment at two exploratory workshops and a consultation period.</p> <p>The table in the ‘Environment’ Row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park.</p> <p>Both positive and negative implications are identified.</p> <p>An Article 4(1) Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated.</p> <p>There may, however, be less access to open space in terms of camping in the open as more remote locations are more likely to be unacceptable in terms of impacts on landscape and the use of the private car.</p> | <p>This is a balanced outcome ensuring that access is managed to avoid harm to the National Park.</p> |
| <p>Built Environment – Built Heritage</p> | <p>Stakeholders were provided an opportunity to comment at two exploratory workshops.</p> <p>The table in the ‘Environment’ Row provides a summary of the pros and cons of the Permitted Development Rights system for both 28-day sites and for Exemption Organisations in the Pembrokeshire Coast National Park in relation to the historic environment. Both positive and negative implications are identified.</p> <p>An Article 4(1) Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated. Policy 8 d) ‘the historic environment is protected and where possible enhanced’ would be considered when reaching conclusions on applications submitted.</p> | <p>This is a balanced outcome ensuring that the historic environment is not harmed.</p> |

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| CO ₂ e Emissions or Mitigations | Stakeholders were provided an opportunity to comment at two exploratory workshops. When discussing the Pros and Cons table the table was edited to include the need to locate sites in more accessible locations. The Article 4(1) Direction will require the submission of a planning application. Planning applications will be assessed against the adopted LDP 2 which contains policy 59 Sustainable Travel which seeks to ensure there are opportunities to travel other than by private car and policy 60 'Impacts of Traffic.' By not progressing with an Article 4(1) Direction the private car is more likely to be used. | This is a positive outcome. |
| CO ₂ e 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 CO ₂ e Emissions or Mitigations commentary. | Neutral impact. |
| Resources Use – Prevention, reduction, re- use, recovery, or recycling waste | Linked to the introduction of an Article 4(1) 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. | |

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| 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

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| Do you have any data/ engagement gaps? | <p>The Background Paper has been prepared to accompany the formal consultation and introduction of the Article 4(1) Direction – see Appendix A to the Committee Report.</p> <p>The public consultation was undertaken from 29 May to 20 September. Responses have been considered and a Report of Consultation has been prepared and has informed the recommendations.</p> <p>It is difficult to estimate the economic impacts of the Article 4(1) Direction and an exercise judgment is required.</p> <p>A formal consultation period was required alongside NPA’s Notice of Declaration of intention to implement an Article 4(1) Direction. This was held between 10 January and 21 February 2025. It was considered by some respondents that the Authority had a lack of evidence to support the proposal. It was suggested that information should be provided on evidence of complaints received, enforcement actions and mapping of compliance. Case Study examples of 28 day sites has been included as an appendix to the Report of Consultation.</p> <p>A small number of respondents stated that there was a lack of consultation undertaken by the Authority and that the outcome of this consultation had been pre-determined. It was also stated</p> |
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| | <p>that the previous consultation undertaken during summer 2024 had generated an inadequate level of response.</p> <p>The Authority has undertaken considerable engagement and consultation which exceeds statutory requirements. The consultation on Camping and Caravan Development was undertaken last summer for a period in excess of three months. The pre-consultation engagement undertaken is detailed in Table 1 and the consultation engagement events is detailed in Table 2 in the Report of Consultations (October 2024) Camping and Caravanning Development in the Pembrokeshire Coast National Park Report-47-24-Caravan-and-Camping-Consultation-Update.pdf.</p> <p>The procedures for undertaking an Article 4(1) Direction are set out in The Town and Country Planning (General Permitted Development etc) (Amendment) (Wales) Order 2022 (schedule 2A). The order requires the Authority to invite representations concerning the direction over a period of at least 21 days. This consultation has been undertaken for a period of six weeks. No further engagement or consultation is considered necessary as two consultations have been undertaken with significant advertisement, notification and press interest.</p> |
| <p>If yes, can further information be obtained or additional engagement to fill any of these data gaps?</p> | <p>See above.</p> |

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

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

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

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

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

| Well-being Goals/ Ways of Working | How have the following been taken into account? Reference relevant evidence and information from engagement feedback. | Response/ Mitigation/ Any additional actions needed |
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| 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. | 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.

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| | An Article 4(1) Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated. | |
| 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(1) 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. • mean the opinion of those who are affected would be sought. • mean that there is better control of unregulated caravan and camping sites thus ensuring that: • mean the amenity of neighbouring properties and local communities are more fully considered. <p>mean remote locations are more likely to be avoided for siting such sites which may be more difficult to access by emergency services. 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. |

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.

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| A Park/ Pembrokeshire / Wales of Vibrant Culture & Thriving Welsh Language ¹⁰ | Please see commentary under ‘Welsh Language’ above and under ‘Built Environment, Heritage’ under Section 6 ‘Biodiversity and Decarbonisation’. | Positive Impact. |
| 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. An Article 4(1) Direction does not preclude applicants gaining planning permission for their proposal. This would allow potentially for the positives to continue and improve, and the cons mitigated. | On balance a more positive outcome for well-being is identified. |
| Long Term ¹² | The use of an Article 4(1) 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 Article 4(1) 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: - Boosting biodiversity and halting its decline | The assessment has identified significant positive impacts in terms of biodiversity and. Contributions towards |

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.

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| | <ul style="list-style-type: none"> - Destination Net Zero for the National Park - People being healthier and happier and more connected to nature and heritage. - People have a chance to live work and enjoy the National Park. <p>The National Park Partnership Plan 2025 to 2029 which was approved by the National Park Authority Members on 26 March 2025 identifies an action under the Conservation section to 'Manage the impacts of permitted development rights for camping and caravan sites'.</p> | reducing carbon emissions, ensuring greater inclusivity in decision making are also identified. A balanced outcome in terms of income generation (some planning applications may be refused), and enjoyment (all areas may not be accessible but sensitive sites would be protected). |
| Collaboration ¹⁵ | The preparation of an Article 4(1) 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(1) 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. The Authority has undertaken two public consultations. | Involvement undertaken through two public consultations. |
| Horizon Scanning – Future Trends Considerations | There will be a need to monitor Welsh Government proposals for registering and licensing holiday accommodation. | 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.

| | | |
|--|--|--|
| | 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. | |
|--|--|--|

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

| |
|--|
| <p>WFG: 7 Well-being Goals for Wales / 5 Ways of Working and Future Trends/ Horizon Scanning Summary/ Recommendation from Assessment:</p> <p>The proposals fit well within the Well-being Goals and the 5 Ways of Working. Horizon scanning will continue as the project progresses.</p> |
|--|

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

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

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

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 <small>18</small> | A | B | C | D | E | Cons <small>19</small> | 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 | | | |

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.

| Pros 18 | A | B | C | D | E | Cons 19 | A | B | C | D | E | F |
|------------|--|--|---|---|--|------------|--|--|---|---|--|--|
| | 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. attract groups or can easily control those booking | | Access to the National Park may not be in the 'right place'. | Some hotspots – over visited | Amenity of neighbours. Noise Light. Unsocial hours | Potential for conflict with other visitors and communities | Visitor safety a concern ²² | Sometimes visitor conflict is on 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 | Landscape impacts. Special Qualities ²⁵ Night sky. | Ecology ²⁶ may be affected | Archaeology may be affected |

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.

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.

| Pros 18 | A | B | C | D | E | Cons 19 | A | B | C | D | E | F |
|------------|---------|---|---|---|---|------------|-------------------------|---|--|--|---|---|
| | | | | | | | | | from flood events | | | |
| | | | | | | | | Water connection ²⁷ | | Cumulative Impacts of camp sites in one location | | |
| | | | | | | | | 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 | More likely to be reliant on the private car in | | |

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.

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.

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

Pembrokeshire Coast National Park Authority

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

What is an Article 4(1) Direction?

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

What does this change mean?

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

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

Clarification regarding potential Implementation of Article 4

Uses which do not involve development

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

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

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

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

Exempted Certificate Sites

Organisations which meet certain requirements can apply to the Welsh Government for exemption certificates under the Caravan Sites and Control of Development Act 1960 and Public Health Act 1936.

To be eligible, organisations must have:

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

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

There are 3 types of exemptions for caravan organisations:

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

There is a further exemption for tented camping which allows the use of any camping ground owned by (or provided or used by) organisation members to be used for tented camping.

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

Exempted Uses

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

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

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

- Any licences gained for the event

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

Level of information to support a planning application

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

Information needed will be:

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

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

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

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

Pembrokeshire Coast National Park Authority

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

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

Dated the 11 day of December 2024

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

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

THIS DIRECTION is made under Article 4(1) of the Order and, in accordance with the Order **will take effect on 1 January 2026** subject to the further consideration of any representations received during the period 10 January 2025 and 21 February 2025 and thereafter it is proposed that it will come into force, subject to confirmation by the Authority.

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

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

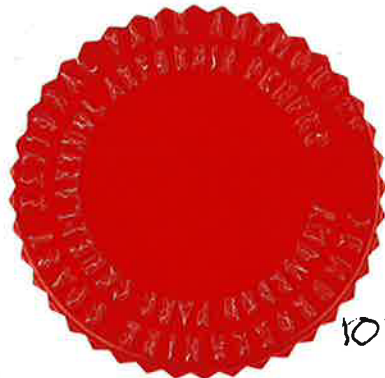
National Park Authority was hereby affixed

On the *11th* day of *December* 2024

in the presence of:



Authorised Signatory



1020

Schedule 1 – Restriction of Permitted Development Rights

The following descriptions of development referred to in:

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

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

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

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

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

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

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

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

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

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

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

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

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



Article 4 Direction

Pembrokeshire Coast National Park Boundary

Graddfa / Scale @A4: 1:300,000

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

Dyddiad / Date: 25/11/2024



Parc Cenedlaethol
 Arfordir Penfro
 Pembrokeshire Coast
 National Park



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

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

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

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

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

The following types of planning applications will be prioritised:

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

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

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

Advice Note to Setting Up a 28-Day Camping Site

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

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

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

This advice note is for use only for those wishing to operate a camping 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 development plan which comprises of both Future Wales: The National Plan 2040 and the adopted 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. The Authority has prepared a Working Protocol setting out that the Authority will seek to prioritise the determination of planning applications which are subject to the Article 4(1) Direction to remove permitted development rights for the use of land for camping, caravans and/or mobile homes for not more than 28 days.

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

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

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

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

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

Your Planning Permission

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

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

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

Further information

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

Fees

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

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