

Amendments to permitted development rights

Details

Q1. Details	
Name	The Camping and Caravanning Club
Organisation	The Camping and Caravanning Club
Preferred contact details (Email address, phone number or address)	[REDACTED]

Q2. Type (please select one from the following)	
Business	

Q3. Responses to consultations may be made public. To keep your response anonymous (including email addresses) tick the box.

No Response

Questions

Q4. Q1. Should the additional days granted by Class A of Part 4A be retained permanently, permitting temporary uses to take place for up to 56 days (28 days for specified uses) in a calendar year?

No

Comments:

No, we believe for campsites, the number of permitted days should revert back to 28 days for several reasons outlined below, and in summary:

- There have been many complaints where more recently active temporary campsite providers have not adhered to the well-established and effective rules, which has not been policed by local authorities. Those organisations working within the current exemption regulations wish to ensure the regulations are maintained and followed by all.
- This has resulted in an unlevel playing field between those organisations which provide temporary campsites following the rules (and have been doing so long before the pandemic) versus those recently established operators that may be circumventing current legislation since the temporary 56-day extension was introduced.
- The extension to 56 days was in response to the pandemic, to increase capacity while people's ability to travel overseas for holidays or within multiple household groups was curtailed. Campsites offer a socially distant holiday in the fresh air. However, as those restrictions have lifted and people are resuming overseas holidays, emergency capacity is no longer needed through a permanent extension to 56 days. Temporary campsites are for recreational purposes whereas we could see a scenario developing that effectively encourages those looking for more permanent residential camping under the 56-day rule.
- Given the lack of policing and the increase in complaints about the facilities provided by some temporary campsites, there are quality assurance issues to be considered. Many organisations, such as members of the Wales Tourism Alliance, have actively worked for some years to present Wales as a high-quality tourism destination. A lack of quality assurance in the past two years undermines this work, and as a tourist industry we need to provide a consistently high-quality product in order to encourage repeat visits. This focus was highlighted even more on February 8 when the Welsh Affairs Committee opened a new inquiry into Wales becoming a global tourist destination.

To add further detail, while the new Part 4A of Schedule 2 outlines that landowners are responsible for operating the temporary uses in ways that minimise disturbance to local residents, with local authorities having powers to intervene where statutory nuisances occur, we have seen that this has not been the case. Local authorities haven't stepped in to manage or control disruption resulting from the boom in pop-up sites and some landowners, we believe, have been allowing motorhomes and caravans on the sites instead of just tents.

Due to the nature of the road infrastructure within parts of rural Wales, given the increase in road usage, there could be additional damage to the local environment, such as verges, which will be affected by insufficient passing places.

During 2020/2021, The Camping and Caravanning Club has heard examples of landowners taking advantage of the extension but not providing the necessary facilities on site to accommodate campers, such as means of dry and human waste disposal.

Since the implementation of both the Public Health Act 1936 and the Caravan Sites and Control of Development Act 1960, there are exemptions incorporated, which permit certain organisations approved by the Welsh Assembly to establish campsites under appropriate guidance and supervision that includes reviewing the local road infrastructure to determine whether it can handle the proposed additional traffic, reviewing the impact both to local residents and the local environment, and ensuring the appropriate facilities are in place prior to receiving campers. These campsites are then continually monitored by the organisation through onsite assessment visits. The process of ensuring quality and safe campsites has been approved by the appropriate authorities for decades.

Having lots of temporary campsites damages the value of the exemptions awarded to clubs and bodies such as ourselves. These exemptions are designed to ensure campsites operate safely and with environmental considerations front and centre. Allowing temporary campsites to operate for extended periods with very few checks on the way they are operated undermines this long-standing and proven approach. Put simply, it is not a level playing field and does not provide a consistent approach.

Q5. Q2. Do you have any evidence as to any benefits and impacts as a result of introducing the additional number of days for temporary uses to take place since April? If yes, please specify.

Yes

Comments:

We do not believe there is a need to offer additional campsites in Wales. Currently in Wales, our organisation alone offers campers a network of more than 180 established certificated campsites to stay on (that's 2,700 pitches per night). During 2021, the Club offered a further 110 camping events (Meets and Temporary Holiday Sites) within Wales and to date 85 camping events for 2022, which will increase as the year progresses. This does not include the campsites and temporary camping events that are being offered by other organisations that are allowed to operate under the use of exemptions.

During the extension of the 28/56 day period, the Camping and Caravanning Club received a significant number of calls and emails from both existing Certificated Site owners and local residents, complaining about landowners who they felt were not operating within the confines of the regulation. This included extensive noise and light pollution, damage to the local environment and visual intrusion to the surrounding areas.

Q6. Q3. Do you have views on whether there should be additional restrictions on the use of this PDR to mitigate against potential impacts of making this permanent? If yes, please specify.

Yes

Comments:

We are opposed to the 56-day period becoming permanent as it would need to be policed much more closely with inspections of sites that were thought to be breaking the regulations. This would require additional resources that, in all likelihood, would not be forthcoming.

Q7. Q4. Should the number of days for holding a market generally be extended? If Yes, what is an acceptable number of days for holding a market? What conditions should apply to manage the planning impacts?

No Response

Q8. Q5. Should any additional days over the permitted 14 days be provided for markets operated by or on behalf of a local authority?

No Response

Q9. Q6. Do you agree the permitted changes of use within town centres should become permanent? If not, please provide your reasons for disagreeing.

No Response

Q10. Q7. Do you agree the permitted development right for the use of the highway adjacent to a hospitality use for that purpose should be made permanent? If not, please provide your reasons for disagreeing.

No Response

Q11. Q8. If you answered yes to Q7, are any additional conditions required to mitigate potential amenity impacts?

No Response

Q12. Q9. Do you agree the permitted development right for the installation of awnings at hospitality uses should be made permanent? If not, please provide your reasons for disagreeing.

No Response

Q13. Q10. Do you have any comments regarding Part 3A?

No Response

Q14. Q11. Do you have any comments regarding Part 12A?

No Response

Q15. Q12. Do you agree that HMOs should not benefit from permitted development rights for alterations and extensions to a dwellinghouse granted by Part 1 of the GPDO? If not, please provide your reasons for disagreeing.

No Response

Q16. Q13. Do you agree with the proposed alterations to Class F? If not, please suggest alternative approaches, restrictions or thresholds that could be adopted.

No Response

Q17. Q14. Do you agree greater flexibility should be provided through permitted development rights to accelerate the rollout of electric vehicle charging infrastructure? If not, please provide your reasons for disagreeing.

No Response

Q18. Q15. Do you agree with reintroducing permitted development rights for the protection of poultry and other captive birds?

No Response

Q19. Q16. Do you agree with the proposals for amending Article 4 directions?

No Response

What effects do you think there would be? How could positive effects be increased, or negative effects be mitigated?

Q21. 18. We have asked a number of specific consultation questions. If you have any related issues which we have not specifically addressed, please use the space below to raise them.

Submit your response

Email address
