



WTA Response to the Welsh Government 'Amendments to permitted development rights' consultation

Wales Tourism Alliance

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Industry Representation - The Wales Tourism Alliance

The Wales Tourism Alliance (WTA) is the recognised over-arching representative organisation for the tourism industry in Wales, liaising with, and coordinating the views of, our member organisations. Where resources allow, the WTA also consults with Government at Westminster, Cardiff and local authorities.

The WTA acts as an intermediary between Government and members, disseminating information to the industry via our on-line presence, member organisations themselves and colleagues in organisations in other parts of the UK. It also uses its networks to gather intelligence to formulate policy positions on behalf of members, seeking to inform and influence policy makers at all levels and all government departments whose work impacts upon the industry.

The membership of the WTA reflects the whole of Wales; national, regional and local representative bodies and businesses. Through its member organisations and forums resting within its general membership, this amounts to around 7,000 working operators and means WTA contacts and representatives are found in every part of Wales.

It is also multi-sectoral; accommodation (hotels, small serviced units, holiday parks, touring caravan and camping sites and self-catering agencies), attractions, activities, training and skills, tourism guides and transport.

To achieve this the Wales Tourism Alliance brings together a private and public sector partnership of tourism industry interests in Wales, including some of the biggest industry members in the United Kingdom who add their voice to ours.

The WTA exists to work with partners, including Government, on an honest broker basis. This is possible due to our trusted status, independent of Government, supported through annually renewed membership fees. The primary, national driver for strategy, delivery and engagement for the industry lies within Government – uniquely so in the UK and Ireland: The WTA provides the balancing, expert voice of tourism businesses on which successful delivery relies, aiming to make a reality of the concept of partnership.

The WTA therefore works with and on behalf of operators ranging from major industry players from across the UK to the numerous Welsh micro-businesses and SMEs that make up so much of the tourism industry.

Permitted Development: Amendments to the Town and Country Planning (General Permitted Development) Order 1995

Q.1	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?		
	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Comments: No, we believe for campsites, the number of permitted days should revert back to 28 days		

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- The extension to 56 days was an emergency response to the pandemic that increased capacity in order that UK visitors were able to self-isolate away from others whilst on holiday. Whilst the CV-19 virus remains with us this is no longer required and was only needed while people's ability to travel overseas for holidays or within multiple household groups was curtailed. As restrictions have lifted and people are resuming overseas holidays, emergency capacity is no longer needed through a permanent extension to 56 days. This therefore undermines the current licensing scheme
- Complaints from local communities about the extended sites have tarnished the image of the regulated side of the industry where more. Those organisations working within the current exemption regulations wish to ensure the regulations are maintained and followed by all sites.
- We are extremely concerned about the lack of LA resource cross environmental health and planning departments available to monitor and effectively manage the increase in complaints about the facilities provided by some temporary campsites. We, members of the Wales Tourism Alliance, take quality assurance extremely seriously and actively work 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.

A recent Senedd Public Accounts Committee report states:

We suspect there will be no increase in budget and will add to the already unsustainable burden of Local Authority planning departments. In June 2020, the Senedd Public Accounts Committee published the report 'Effectiveness of Local Planning Authorities in Wales'

It states: 'The Auditor General concluded that all planning services – policy, development and building control – have, since 2008-09, seen significant cuts in expenditure with budgets having fallen by 50% in real terms, considering inflation. Net expenditure has fallen from £45 million in 2008-09 to £22.8 million in 2017-18. The biggest cut has been to development control budgets where spend has reduced by 59%'.

'Our overall conclusion is that Planning is critical, but at present it is not able to deliver the aspirations of the Planning, Environment and Well-being of Future Generations Acts because of reductions in resources'.

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 be 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. Pop up sites do not operate as safely and with environmental considerations in the same way licensed sites do.

Q.2 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 ☒

No ☐

Other ☐

Comments:

The WTA does not believe there is a need to offer additional days in Wales. WTA Member organisations offers campers a network of more than 200 established certificated campsites to stay on, not including the campsites and temporary camping events that are being offered by other organisations that are allowed to operate under the use of exemptions.

We would like to draw your attention to our members feedback (The Caravan and Motorhome Club; the Camping and Caravanning Club and the British Holiday and Home Parks Association) during the covid period. They have reported 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.

Q.3 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 ☒

No ☐

Other ☐

Comments:

We are opposed to the 56-day period becoming permanent especially as we do not believe there is the will or resources within local authorities to monitor and manage this additional burden now the worst of the Pandemic is over.