

**Nettleship, Tom**

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**From:** [REDACTED]  
**Sent:** 16 December 2024 22:43  
**To:** LDP - For Enquiries  
**Subject:** Fwd: Comments on LDP2

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----- Forwarded message -----

**From:** [REDACTED]  
**Date:** Mon, 16 Dec 2024 at 22:38  
**Subject:** Comments on LDP2  
**To:** <[ldp@pembrokeshire.gov](mailto:ldp@pembrokeshire.gov)>, [REDACTED]  
[REDACTED]

Dear Ms Lavender, Mr Smith

I'm writing by email because your online form doesn't allow enough characters for my comments. I would also point out that the Deposit Plan link went to the wrong document when I first tried to comment some weeks ago, so I've only today had access to the actual plan, which is disappointing. My comments are as follows:

### **Rural Facilities Survey Report 2018**

The Rural Facilities Survey Report 2018, in paragraph 3.7, states that Llanteg/Llanteglos and Summerhill have been reclassified from Local Village to Service Village "due to an increase in their recognised services and facilities." Neither have a shop, a pub or a church/chapel, so these villages should remain designated Local Villages.

### **Policy GN 56**

The current LDP states that we have overprovision of static caravans in Pembrokeshire. LDP2 seems to be considering allowing development of new caravan sites or expansion of existing ones where the landscape capacity would not be exceeded. But the Tourism Background Paper has zero data on the occupancy rates of static or touring caravans, or the demand for such bedspaces. How can you possibly make plans or decisions relating to developments containing caravans when you have no idea how well used the existing pitches are or whether we actually need more?

The Tourism Background Paper (TBP) notes that "The only LDP policy where any applications have been approved contrary to the policy is GN.19 Static Caravan Sites." It asks, "Should the policy approach be changed to allow modest extensions to existing caravan sites, and should there be a

more positive approach to new caravan sites – see Camping and Caravan Landscape Capacity Study." The TBP quotes Sustainable Tourism – A Framework for Wales (2007), which says that "sustainable tourism will need to consider the needs and quality of life of local communities, enhance and respect culture and local traditions, contribute to local economic prosperity as well as minimise damage to the environment."

The LDP2, in GN56 and paragraphs 5.311 - 5.321 relate to the provision of new caravan sites and extensions to existing sites. It mainly restricts these in relation to landscape capacity (covered in the Caravan, Camping & Chalet Landscape Capacity Assessment report), which is good far as it goes. But there is one large area in Pembrokeshire that should have a specific and unassailable ban on any additional caravans - or any other type of holiday bed provision. This is the area from Amroth and the eastern boundary with Carmarthenshire across to Narberth and on to Pembroke Dock, and everything south of that line to the coast. This area is already over-developed. It suffers from the huge difference in population in summer versus winter, such that the pubs, restaurants and other facilities are overwhelmed in the summer and struggling in the winter. One cannot spontaneously go out for a meal in the summer. If one goes to any of the supermarkets in Kilgetty or Pembroke Dock after 10.30am in the summer it's overcrowded (and I once spent over an hour and a half just getting out of Tesco's car park by foolishly shopping mid-afternoon). Go after 4pm and you find empty shelves. As a resident, this is my lived experience, but I've also heard tourists having the same gripes - along with overcrowded beaches at Wiseman's Bridge, Saundersfoot and Coppet Hall. Apart from actually making the very tourists we depend on not want to come back, if you keep adding something we already have too much of (beds, but in particular static caravan beds), the people wanting them get spread too thinly and existing businesses fail. And you don't know what the true demand is, because you haven't asked that question.

LDP para 6.79 (talking about GN18 Touring Caravan and Tent Sites) says "Avoiding over-development of the visitor economy is critical to its enduring success." I can find no acknowledgement of this concept in LDP2, and this is worrying.

Since 2019 the Council has granted permission, against the current LDP policy, for 175 new static caravan pitches in the south of Pembrokeshire, in the area I'm concerned about. These were from 5 different applications and the reason given in every instance was "economic benefit". This dogged and erroneous idea that if you keep adding caravans that automatically translates to economic benefit is nonsense. I think we've already gone past the point where the number of caravans in the south is causing damage to the economy. It also does not "consider the needs and quality of life of local communities" as advocated by Sustainable Tourism – A Framework for Wales (2007).

Yours sincerely

