

Background Paper for Local Development Plan: Tourism

Static and Touring Caravan and Camp Sites

Development Plans May

2010

EXECUTIVE SUMMARY

This paper is part of a number of background documents which form the evidence base for the Local Development Plan (LDP). This document focuses on caravan provision in Pembrokeshire. It assesses trends in site provision for static and touring caravans and tents in the area of Pembrokeshire County Council's planning jurisdiction.

All planning consents for static and touring caravan sites were analysed in August 2009 to establish how many pitches had consent across the area of Pembrokeshire (excluding the National Park). Two survey approaches were then followed – for static caravans, a desktop survey using the Authorities aerial photography layers from 2005 were analysed, to examine how many static caravans had been placed on each site with planning permission. For touring caravan sites and camp sites, an occupancy survey was conducted in August 2009, each site was visited and numbers of caravans either confirmed at reception or counted on site. The focus of analysis when considering these datasets was on what percentage of the pitches with planning permission were in use at the time of the survey.

In addition to these surveys, secondary datasets from Pembrokeshire County Council's tourism department and from Visit Wales are also drawn upon.

The surveys indicated a high number of static pitches with planning permission (2918) and a slightly lower number of touring pitches with planning permission (1725). The survey indicated that 2553 static caravans were on sites in the aerial photography in 2005, and 1503 touring caravans were on sites in August 2009. This indicates a level of capacity of 13% in both static and touring pitches. The survey did not include Caravan Club sites which do not require planning permission.

Analysis of the location of sites and pitches indicated an uneven distribution of both existing sites and pitches, with a high level of provision of both types of pitches in a relatively small number of community councils in South East Pembrokeshire.

The overall recommendations of this report are to broadly follow the current policy approach of the Joint Unitary Development Plan, including an approach which does not permit the development of new static caravans sites, but does permit some upgrading of existing touring pitches in appropriate locations. For touring caravan sites, an approach which permits new sites which are well related to settlements is favoured. Consideration should be given to altering the area in which new or extensions to touring sites are prohibited from the current area set out in the Joint Unitary Development Plan to one which more closely reflects the community councils in which there is already significant provision.

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Strategic and Planning Policy Context

Strategic Framework

The strategic framework for tourism is established in a number of key documents. The Wales Spatial Plan Update (2008) which plays a key role as an integrating strategic framework for planning recognises the importance of the tourism industry to the Pembrokeshire Haven Area in its vision and strategic priorities. The priorities most relevant for tourism are:

"Increasing higher value-adding economic activities, particularly in the rural economy, by developing an all-year, high quality tourism and leisure sector"

and

"Protecting and enhancing the Area's important environmental assets, maximising their potential through exemplary sustainable development"

The national and regional strategic context for tourism is established by "Achieving Our Potential" - the tourism strategy for Wales (reviewed to cover 2006 - 2013) and the Welsh "Open All Year" document prepared by the South West Wales Tourism Partnership (2004). The four key themes which frame the national and regional strategic context also feed into the PCC Tourism Strategy (2006-2012). These four key themes are:

- Competitiveness and Profitability
- Quality and Value
- Partnership
- Sustainability

PCC's Tourism strategy (2006-2021) developed these themes into four objectives which are:

1. To improve the quality of the tourism experience in Pembrokeshire.

2. To improve accessibility of Pembrokeshire as a destination.

3. To develop effective working partnerships so that all sectors work together to exceed visitors expectations.

4. To embrace a sustainable approach to tourism development which benefits the individual, the community and the environment as well as the visitor.

Planning Policy Context

The national policy framework for addressing tourism issues in preparation of a Development Plan is set out in Planning Policy Wales (PPW) (2002) with additional advice given by Planning Guidance (Wales), Technical Advice Note (Wales) 13, Tourism – October 1997 (TAN 13, 1997) and the Planning Policy Wales (PPW) Companion Guide (2006).

The Welsh Assembly Government's (WAG) objectives for tourism are:

- to encourage sustainable tourism in Wales, maximizing its economic and employment benefits, promoting tourism in all seasons, and encouraging its development in non-traditional destinations, while safeguarding the environment, and the interests of local communities; and
- to manage change in the tourism sector in ways which respect the integrity of the natural, built and cultural environment to provide for economic growth, employment and environmental conservation.

Paragraph 11.1.6 of PPW (2002) states that, "*in rural areas tourist development is an essential element in providing for a healthy, diverse, local and national economy. It can contribute to the provision and maintenance of facilities for the local community. Here too development should be well designed and sympathetic in scale and nature to the local environment and the needs of the local community*".

TAN 13 recognises that although tourism cannot be regarded as a single or distinct land-use category, the issues it raises should be addressed in preparing or revising development plans and in development control decisions. In relation to caravan tourism, sections two and three of TAN 13 set out the problems associated with the provision of appropriate sites and facilities for holiday and touring caravans. It also discusses the imposition and enforcement of seasonal and holiday occupation conditions attached to planning permissions.

This current strategic framework and national planning policy context must be used as the basis for policy formulation for the Local Development Plan unless strong evidence points to a need to depart from national policy.

Relevant Joint Unitary Development Plan (JUDP) Policies

The JUDP is the existing Development Plan for Pembrokeshire. The current policy approach to caravans is set out below. These policies are reviewed within this paper: The JUDP is an all-Pembrokeshire plan which was produced jointly by Pembrokeshire County Council and Pembrokeshire Coast National Park Authority. Both Authorities are producing separate Local Development Plans and therefore this paper focuses on future policies for the Council's area of planning jurisdiction, which excludes the National Park.

Between June 2006 (the date of adoption of the JUDP) and the end of May 2010 85 applications relating to caravan proposals were received by the Authority for the area of Pembrokeshire excluding the National Park. Of these 9 had not been determined.

The nature of these applications varied considerably, from temporary accommodation for agricultural workers, to applications for storage, applications for gypsy traveller sites and applications for certificates of lawfulness for individual residential caravans or small numbers of residential caravans.

Of those caravan applications relating to tourism proposals (18 in total), seven proposals were determined under Policy 23 static caravan development, five of which were refused and two permitted. Six applications were determined under Policy 24 Touring Caravan and Tent Sites, of which four were refused and two permitted. Only two applications were determined under policy 25 upgrading of static touring caravan pitches to or tent pitches to static caravan pitches, (one of which was also determined under policy 23 and refused), the other was given permission. Two applications were determined under Policy 28 site facilities on tent, chalet and caravan sites, both of which were permitted. Two applications were determined under policy 29 seasonal and holiday occupancy conditions, both of which were permitted. It is likely however, that some applicants are deterred from making applications where they know that they will not meet the requirements of the policy, therefore numbers of applications may be lower where policies are restrictive.

Policy 23 Static Caravan Development

Currently, no extension of existing sites or enlargement of site areas is permitted in the County. In exceptional circumstances site areas may be enlarged where this would achieve an overall environmental improvement. The basis of this policy was the evidence (date) that bed spaces in the County were in excess of demand at the time the JUDP was produced. In light of this it was considered that sufficient provision existed and due to the potential visual impact it could cause, it was considered inappropriate to allow for new provision over the course of the JUDP.

Policy 24 Touring Caravan and Tent Sites

This policy currently allows for no new touring or tent sites or extensions to existing sites within area South East of the A477(T)/A4075 and the B4319 and requires that any new sites outside this area must be well related to settlements.

Policy 25 Upgrading Touring Caravan Pitches and/or Tent Sites/Pitches to Static Caravan Pitches

This policy states that upgrading of static or touring sites and pitches is only allowed where the site lies within or adjacent to a settlement which has a settlement boundary. No increase in the number of pitches or site enlargement is permitted. In exceptional circumstances site areas may be enlarged where it would achieve an overall environmental improvement.

Policy 26 Upgrading Static Caravan Pitches to Other Self Catering Accommodation

This policy only permits the upgrading of static caravan sites and/or pitches to other forms of self catering accommodation where the site lies within or adjacent to a settlement or the proposal forms part of a scheme to achieve benefits in terms of layout, design and material used.

Policy 27 Change of Use from Tent Sites to Touring Caravan Sites

This policy will only permit change of use from tent sites to touring sites where there is no increase in the number of pitches, the site area is not enlarged, an overall enhancement of appearance is achieved and where at least one third of the total number of pitches remains exclusively for use by tents.

Policy 28 Site Facilities on Tent, Chalet and Caravan Sites

The purpose of this policy is to ensure that the development of retail facilities on tent, chalet and caravan sites does not affect the vitality and viability of retailing and services of nearby settlements are not adversely affected by ensuring that the facility is not already available in the vicinity and also ensuring that the scale and design is in keeping with the surrounding area.

Policy 29 Seasonal and Holiday Occupancy Conditions

This policy only permits a new unit of holiday accommodation where it can be suitably conditioned. This is to ensure that the property is occupied/available for only holiday purposes and is not to be occupied all year round.

Background and Purpose of Study

Background

In 2008 the Tourism industry was worth a total of £521.4 million to the Pembrokeshire economy as a whole, employing a total of 16,222 people, 9,576 of those within the tourism accommodation sector. (STEEAM report 2008)¹

The County of Pembrokeshire has 160 caravan and camp sites in total (excluding Caravan Club sites). Of this total, the majority (82) are entirely within the Pembrokeshire Coast National Park (PCNPA). 74 are entirely within the area under the planning jurisdiction of Pembrokeshire County Council (PCC) and three are in locations split between the two authorities. This total does not include Caravan Club sites operating within the County as these sites do not require planning permission².

Of the above total, for PCC's planning area, 21 sites are exclusively for use by touring caravans and tents, seven are for residential use and the remaining 47 sites are primarily used by either static caravans and chalets, often with a secondary use occupied by touring caravans and tent pitches or residential caravans.

Purpose of Study

The survey report will form part of the evidence base used to inform the preparation of the emerging Local Development Plan (LDP) policies. The data may also be used to inform the decision making process for the determination of planning applications where permission is sought for the provision of new caravanning, camping and chalet holiday accommodation and/or facilities within PCC's planning area.

¹ Available at http://www.tourismhelp.co.uk/

² Camping and Caravanning Club Sites are exempted through Schedule 1 of The Control of Development Act 1960. This gives the right to allow landowners to establish small campsites on their land without the need for planning permission. These sites can have no more than 5 caravans on site per night and any single caravan is not permitted to stay in excess of 28 days.

Methodology

This report includes a review of available data on caravans from sources such as Visit Wales. It also includes data recorded through a survey of caravan and camping sites in PCC's planning area. The report provides an analysis of pitch occupancy and capacity for caravans and tents by the type of holiday accommodation. The survey has analysed provision by area and considered evidence on landscape available from the Countryside Council for Wales' LANDMAP landscape assessment. The survey does not analyse the quality of sites, their price or individual popularity. No assessment of compliance with landscaping conditions, or individual impacts on the landscape of sites has been made.

Static Caravans

Static and residential sites in Pembrokeshire have been surveyed by means of a desktop exercise. Using a workspace created on the GIS package MapInfo the total number of caravans present on a site were counted using the Council's 2005 aerial photography layer. The number of caravans on a site was then compared with the total number that have planning permission. The figure for the number of static or residential caravans permitted on authorised sites was obtained from the site's planning history and/or site licence.

This provides an indication of how many additional pitches are available and could be brought forward under existing consents as static pitches. The total percentage of occupied static pitches in the County can be calculated as illustrated below. (For limitations to survey methodology see relevant section on static caravans

Static Pitch Occupancy Rate = <u>Total Number of Statics Counted</u> x 100 Total Number of Statics Permitted

Touring Caravans and Camping Parks Methodology

At the beginning of August 2009 every touring and tent site in the County was surveyed. The purpose of carrying out the touring caravan and tent survey at this time was to give a snapshot of pitch occupancy for touring caravans during Pembrokeshire's peak tourist season. The number of touring caravans and tents on each site at the time of survey were counted and information regarding the facilities on each site also recorded. Where available, the number of people on site at the time of survey was also noted. The percentage occupancy of touring pitches for the County has been calculated as illustrated by the table below. (For limitations to survey methodology see relevant section on touring caravans) The figure for the number of touring caravans and tents permitted on authorised sites is obtained from the site's planning history and/or site licence. These numbers do not include pitches or sites operated under the Camping and Caravanning Club Sites exemption through Schedule 1 of The Control of Development Act 1960 as these do not require planning permission. This gives the right to allow landowners to establish small campsites on their land without the need for planning permission. These sites can have no more than 5 caravans on site per night and any single caravan is not permitted to stay in excess of 28 days.

Touring Pitch Occupancy Rate = <u>Total Number of Pitches Occupied</u> X 100 Total Number of Pitches Permitted

Static and Residential Caravan Analysis

Static Caravan Occupancy in Wales

The table below shows the seasonal occupancy rates of static caravan pitches for Wales as a whole and also for the region of South West Wales³. The statistics on caravan occupancy have been obtained from self catering annual occupancy surveys carried out by Visit Wales (formerly the Wales Tourist Board)⁴. The figures indicate a steady increase in static pitch occupancy in Wales during the period from 2005-2007. A substantial 15% increase in static pitch occupancy rates occurred during the same period in the South West Wales region. 2008 figures show a decrease in static occupancy figures for both Wales and the South West Wales region, though occupancy figures are still higher than those of 2005, at 66% and 65% respectively⁵.

Tab	le 1:								
				Static Occupancy Rates (%) based on Seasonal					
			Averages (M	Averages (May - Oct)					
	Area		2005	2006	2007	2008			
	Wales		62%	67%	71%	66%			
	South	West	61%	70%	76%	65%			
	Wales								

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³ South West Wales region includes Pembrokeshire, Carmarthenshire, Swansea, Neath and Port Talbot ⁴ <u>http://wales.gov.uk/topics/tourism/research/occupancy/?lang=en</u>

Occupancy is measured by relating the number of units let during the reporting period to the total number available for let during that time.

⁵ Note these figures exclude privately owned static caravans which may not be available for the public to rent.

Pembrokeshire County Council's Tourism team have completed self catering occupancy surveys for the County for all of 2008 and for January – July 2009 based on small sample sizes. These figures, like the WAG's, illustrate how many of the static caravans on sites were occupied. In 2008 the highest average pitch occupancy was 90.2%, recorded in August based on a sample size of 10 sites. The July average pitch occupancy figure for 2008 was 78.9% based on a sample size of 7. For the month of July in 2009 average static pitch occupancy was recorded at 72.7%, also based on a sample size of 7, not indicating any significant change in pitch occupancy. These figures indicate that August is still the month in which the highest level of occupancy is achieved.

Static Caravans in Pembrokeshire

The data for this survey of static pitch occupancy in Pembrokeshire has been obtained using aerial photography from 2005. These figures show how many static caravan sites have permission for additional caravans that are currently not on site, rather than how many caravans had people staying in them. The results from the survey are shown below.

The total number of static and residential caravans or chalets counted on authorised sites in Pembrokeshire is 2553⁶.

The total number of static and residential caravans or chalets permitted on authorised sites in Pembrokeshire is 2918.

The total number of available static pitches (surplus capacity) on authorised sites is 365.

The figure for available static pitches illustrates the numbers of static caravans with planning permission but that are not yet placed on sites.

Based on the figures above the calculation for the percentage pitch occupancy and available capacity for static caravans in the County is shown below.

Static Pitch Occupancy= $\frac{2553}{2918}$ x 100 = 87%

Surplus Existing Capacity = 13%

The 2005 occupancy figure obtained for authorised sites in PCC's planning area is compared to the 2006 occupancy figures for Pembrokeshire Coast National Park Authority (PCNPA) in the table below. This is to give a clearer

⁶ The count of static caravans on sites in PCC was carried out using a 2005 aerial photography layer, The total figure must be considered in light of possible limitations including 1) the time of year the aerial photography was taken and 2) the potential obstruction of certain caravans from view as a result of overhanging trees and 3) potential differences between 2005 and 2009.

indication of the static occupancy on sites across Pembrokeshire as a whole and the comparison between both areas.

The occupancy of static caravans is, as may be expected, highest on sites within the National Park. This is largely due to the popularity of caravan sites in a coastal location and within the National Park. The Pembrokeshire Tourism occupancy survey of static caravan pitches for January – July 2009 across Pembrokeshire, based on small sample sizes, shows an average static pitch occupancy of 48.6% for the months March to July. The highest static pitch occupancy rate was recorded in July of this year, at 72.7% occupied. This indicates that static caravans are a popular accommodation choice for those visiting or holidaying in Pembrokeshire. However, there is still existing surplus capacity in terms of occupancy rates of situated static caravans at present. Moreover, there is capacity under existing consents for a further 365 static caravans (13% of total permitted static caravans) to be added to existing

Table 2: Percentage occupancy of static pitches as a proportion of those permitted across Pembrokeshire 2005/2006.

Pembrokeshire County Council	Pembrokeshire Coast National Park
87%*	92%**

* Figure calculated based on 2005 aerial photography PCC MapInfo layer

** Figure from 2006 survey obtained from PCNPA LDP Enjoyment Background Paper (2009)

Levels of Provision by Area

sites.

Static caravan pitch occupancy levels in PCC's planning area can be broken down in order to compare static availability by Community Council area. The table below shows the survey results for the percentage occupancy of pitches on static caravan sites within each Community Council area under the jurisdiction of PCC. A map of Community Council areas for the County is shown in Appendix 2. Community Council's can also be grouped into six Area Liaison Forum (ALF) areas shown by the different coloured areas on the map in Appendix 2.

Area Liaison	Surplus Capacity	Pitches	Total Pitches
Forum		Available	Permitted
North	29%	67	229
North East	0%	144	149
Mid	15%	22	147
South	12%	6	50
South West	0%	0	0
South East	12%	414	2348

Table showing surplus capacity by Area Liaison Forum (shown in Map below):

The thematic map below is intended to give a spatial representation of static pitch occupancy across the areas under the jurisdiction of PCC by showing the percentage pitch occupancy for static caravans according to ALF grouping of Community Councils. As shown in the table above, the majority of static caravan sites are clustered in the South East portion of the County. 66% of static sites in the County are located in the South East alone. This area also recorded the joint second highest pitch occupancy in the survey. Within the South East 46% of pitches (1371) are located in only 6 community councils (Amroth, St Florence, East Williamston, Tenby, Penally and St Mary Out Liberty). The North East has recorded the highest static pitch occupancy in the County (103%) for the 5 sites located within the area.

The map demonstrates that the areas with the highest pitch occupancy on static caravan sites are recorded in the North East, South East and South ALF areas . For the South area, this reflects the survey results for the County in 1998 with the South of the County recording an overall higher static pitch occupancy on authorised sites at 84%.

A full list of all sites included in this survey can be viewed in Appendix 1.



Table 3: Percentage Pitch Occupancy and Capacity on Static Caravan Sites by Community Council Area and Area Liaison Forum (ALF)

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Pembroke Dock South 2 35 35 0 100% South Total 3 50 44 6 88% Amroth South East 4 269 259 10 96% Carew South East 1 50 48 2 96% East Williamston South East 7 386 310 76 80% Kilgetty/Begelly South East 7 386 310 76 80% Lampeter Velfrey South East 3 285 290 -5 102%* Martletwy South East 1 30 27 3 90% Mathry South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236		North East Total	5	144	149	-5	103%*
South Total 3 50 44 6 88% Amroth South East 4 269 259 10 96% Carew South East 1 50 48 2 96% East Williamston South East 7 386 310 76 80% Kilgetty/Begelly South East 8 302 182 120 60% Lampeter Velfrey South East 3 285 290 -5 102%* Martletwy South East 1 30 28 2 93% Mathry South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236	Pembroke	South	1	15	9	6	60%
Amroth South East 4 269 259 10 96% Carew South East 1 50 48 2 96% East Williamston South East 7 386 310 76 80% Kilgetty/Begelly South East 8 302 182 120 60% Lampeter Velfrey South East 3 285 290 -5 102%* Martletwy South East 1 30 28 2 93% Mathry South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Tembleton South East 1 1	Pembroke Dock	South	2	35	35	0	100%
Carew South East 1 50 48 2 96% East Williamston South East 7 386 310 76 80% Kilgetty/Begelly South East 8 302 182 120 60% Lampeter Velfrey South East 3 285 290 -5 102%* Martletwy South East 1 30 28 2 93% Mathry South East 1 30 27 3 90% Narberth South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 3 262 236 165 90% Templeton South East 3 262 236 165 90% Temby South East 1 120		South Total	3	50	44	6	88%
East Williamston South East 7 386 310 76 80% Kilgetty/Begelly South East 8 302 182 120 60% Lampeter Velfrey South East 3 285 290 -5 102%* Martletwy South East 1 30 28 2 93% Mathry South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Grand Total 39 2348	Amroth	South East	4	269	259	10	96%
Kilgetty/BegellySouth East830218212060%Lampeter VelfreySouth East3285290-5102%*MartletwySouth East13028293%MathrySouth East13027390%NarberthSouth East2153152199%PenallySouth East2160151994%St FlorenceSouth East2174167796%St Mary Out LibertySouth East326223616590%TempletonSouth East41271111687%TenbySouth East1120112893%Grand Total592918255350487%	Carew	South East	1	50	48	2	96%
Lampeter Velfrey South East 3 285 290 -5 102%* Martletwy South East 1 30 28 2 93% Mathry South East 1 30 28 2 93% Mathry South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Mathry South East Total 39 2348 2073 414 88%	East Williamston	South East	7	386	310	76	80%
Martletwy South East 1 30 28 2 93% Mathry South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Grand Total 39 2348 2073 414 88%	Kilgetty/Begelly	South East	8	302	182	120	60%
Mathry South East 1 30 27 3 90% Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 2 174 167 90% Templeton South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Grand Total 39 2348 2073 414 88%	Lampeter Velfrey	South East	3	285	290	-5	102%*
Narberth South East 2 153 152 1 99% Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Grand Total 59 2918 2553 504 87%	Martletwy	South East	1	30	28	2	93%
Penally South East 2 160 151 9 94% St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Grand Total 59 2918 2553 504 87%	Mathry	South East	1	30	27	3	90%
St Florence South East 2 174 167 7 96% St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% Grand Total 59 2918 2553 504 87%	Narberth	South East	2	153	152	1	99%
St Mary Out Liberty South East 3 262 236 165 90% Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% South East Total 39 2348 2073 414 88% Grand Total 59 2918 2553 504 87%	Penally	South East	2	160	151	9	94%
Templeton South East 4 127 111 16 87% Tenby South East 1 120 112 8 93% South East Total 39 2348 2073 414 88% Grand Total 59 2918 2553 504 87%	St Florence	South East	2	174	167	7	96%
Tenby South East 1 120 112 8 93% South East Total 39 2348 2073 414 88% Grand Total 59 2918 2553 504 87%	St Mary Out Liberty	South East	3	262	236	165	90%
South East Total 39 2348 2073 414 88% Grand Total 59 2918 2553 504 87%	Templeton	South East	4	127	111	16	87%
Grand Total 59 2918 2553 504 87%	Tenby	South East	1	120	112	8	93%
		South East Total	39	2348	2073	414	88%
							87%

*This reflects over occupancy (pitch occupancy levels above those permitted).

Historic Trends

It is possible to compare the current levels of occupancy with historic trends from previous studies. A Caravan and Tent Survey was carried out by the Council in August 1998 for both Pembrokeshire County and Pembrokeshire Coast National Park. In this survey there were a total of 7737 static pitches permitted on authorised sites across the entire County. Of these, 6436 pitches were occupied, leaving a total of 1301 available static pitches (17% of surplus capacity).

For the area of Pembrokeshire excluding the National Park, there were a total of 2975 static pitches permitted on authorised sites at the time of survey. Of these, 2309 static pitches were occupied at the time of survey leaving a total of 666 static pitches available in the area of Pembrokeshire excluding the National Park in 1998. Therefore, surplus capacity on static pitches in 1998 was 22% of the total.

In comparison, the 2009 survey recently carried out has shown a decrease in the number of static pitches permitted at 2918 (a decrease of 57 pitches). Of these, a total of 2553 pitches were in use at the time of the recent survey leaving a total of 365 static pitches available. The capacity on static sites in the County for 2009 is 13%. Based on the figures from both surveys, this demonstrates that the change between the two dates amounted to an additional 244 pitches being added to sites over the period 1998 to 2005 (the date of the photographic layer used to count pitches). These figures merely provide a snapshot of change, but on this basis the additional 365 static pitches available under existing consents represent significant surplus capacity during the LDP plan period.

Residential Caravan Sites in Pembrokeshire

There are a total of 220 residential caravans permitted on sites across the planning area of PCC. The graph below shows the percentage pitch occupancy and available capacity for residential caravans for authorised sites in the County. The table below also gives the Community Council and Area Liaison Forum each site falls within and also information regarding permitted pitches, pitches occupied on site and available pitches.

The Rising Sun residential caravan site has the most surplus capacity for residential pitches at 92%, with 11 out of 12 pitches vacant. Trefgarn Owen has the second highest capacity for residential caravans with 6 out of 15 permitted pitches available (60% capacity). Scotchwell caravan site has the most residential caravans permitted at 52. This site has 8% capacity for residential caravans at this time. Shillingford, Hill Farm, The Orchard and Pen Y Cwm sites have no capacity with all their permitted pitches occupied by residential caravans. Overall, there is a 13% capacity for residential caravans on authorised sites across the County⁷.

		Community	Area Liaison		On		Percentage Pitch
Name	Address	Council	Forum	Permitted	site	Available	Occupancy
Traine	Pelcomb		1 Orann	1 onnicou	ono	7 tranabio	Cocupancy
Rising Sun	Bridge	Camrose	Mid	12	1	11	8%
Scotchwell	Haverfordwest	Haverfordwest	Mid	52	48	4	92%
Park Hall	Pen Y Cwm	Brawdy	North	18	18	0	100%
Trefgarn	Trefgarn-						
Owen	Owen	Brawdy	North	15	13	2	87%
Mabws							
Bridge	Mathry	Mathry	North	30	27	3	90%
Monkton							
Caravan							
Paddock	Monkton	Pembroke	South	15	9	6	60%
The		Pembroke					
Orchard	Waterloo	Dock	South	7	7	0	100%
		Pembroke					
Hill Farm	Pembroke D	Dock	South	28	28	0	100%
		East	South				
Greenacres	Kilgetty	Williamston	East	20	18	2	90%
	<u> </u>		South				
Shillingford	Kilgetty	Kilgetty/Begelly	East	23	23	0	100%
			Total	220	192	28	87%

Table 4: Residential Caravan Capacity on Authorised Sites in PCC.

⁷ Please note figures for residential caravan sites do not include 5 gypsy/traveller sites across the PCC area. These needs of these sites are being assessed through a separate Gypsy Traveller Needs Assessment.





Summary and Recommendations for Static and Residential Caravan Sites

The monitoring of static sites revealed that there are 365 pitches available on existing permitted static caravan sites across the County (excluding the National Park) with a further 28 available on residential sites, giving a total of 393 pitches available on static and residential sites for the LDP plan period.

In terms of spatial locations, the dominant location of static caravan provision is in the South East area, where 66% of static sites are located. In terms of pitch numbers, 46% of all static pitches (1371) are located in a very small number of community councils (Amroth, St Florence, East Williamston, Tenby, Penally and St Mary Out Liberty). When the volume of static caravan sites in the National Park in the South East is considered, it is apparent that this area of the County's landscape is enormously impacted on by the presence of caravan parks. Whilst this has positive benefits for the economy and reflects the prevalence of the tourism industry in this area, it does place pressure on infrastructure and alter the landscape.

Given that static caravans are often an unattractive form of development which can have significant adverse landscape impacts, and considering the availability of pitches on existing sites (365 pitches available), combined with the evidence from Visit Wales and PCC monitoring that current pitches on sites are not fully occupied, the recommendation for the LDP is that the JUDP policy of no new additional static caravan sites or extension to pitch numbers on existing static caravan sites be permitted is maintained. However, a policy approach similar to the current JUDP Policy 25 which permits upgrading of existing touring sites in appropriate locations should be considered. This should be supplemented by monitoring over the first five years of the LDP, with the potential to review this policy if evidence of substantial uptake of the 365 pitches takes place.

Touring Caravan and Tent Site Analysis

Touring Caravan Occupancy in Wales

Annual occupancy surveys carried out by Visit Wales for self catering accommodation also includes statistics for the seasonal occupancy of touring caravans across Wales⁸. The table and graph below show a comparison between average seasonal occupancy of touring caravans for Wales and South West Wales from 2005 - 2008.

The figures for both Wales and South West Wales show a significant increase in occupancy in 2008 compared to occupancy in the previous years. Touring caravan occupancy is slightly higher in the South West Wales region than it is across Wales as a whole. This figure highlights the popularity of this type of holiday accommodation in this region.

Table 5:

	Touring Occupancy Rates (%) based on Seasonal Averages (May - Oct)					
	2005 2006 2007 2008					
Wales	39%	38%	37%	53%		
South West Wales	32%	39%	42%	56%		

Table 6:



⁸ <u>http://wales.gov.uk/topics/tourism/research/occupancy/?lang=en</u>

Occupancy is measured by relating the number of units let during the reporting period to the total number available for let during that time.

Touring Caravans in Pembrokeshire

A survey of touring caravan pitch occupancy was carried out by Pembrokeshire County Council in the first week of August 2009. The survey was carried out in early August to provide a snapshot of occupancy during the peak tourist season for Pembrokeshire. All known touring and camping sites were visited by Council Officers and all data was recorded from a visual inspection and count at each site or by information provided by staff at the site office. The occupancy data obtained from the survey is shown below.

The total number of touring caravans permitted on authorised sites in Pembrokeshire (excluding the National Park) is 1725⁹., this is below the level of static caravan pitches permitted (2975).

The total number of touring caravan pitches occupied on authorised sites in Pembrokeshire at the time of survey is 1503¹⁰.

The total number of available touring pitches (surplus capacity) on authorised sites at the time of survey is 237.

Based on the results from the survey shown above the calculation for touring pitch occupancy in Pembrokeshire for August 2009 is as follows:

Touring Pitch Occupancy = 1503 x 100 = 87%

1725

Surplus Capacity = 13%

Figures from PCNPA's LDP Enjoyment Background Paper (January 2009) show that the occupancy of touring caravans in Pembrokeshire County Council's planning area was 69% when a survey was carried out in 2006¹¹. By comparing figures for 2006, produced by PCNPA's, with the Council's owen figures for 2009, it is apparent that occupancy on touring pitches increased from 69% to 87% of overall capacity. This may be due to the recession and also the predictions for a warmer summer which may have persuaded more people to holiday in the UK.

There are no touring pitch occupancy figures available for PCNPA's planning area since 2006. To give a clearer picture of touring caravan pitch occupancy across the entire County, information comparing touring pitch occupancy in

⁹ Permitted numbers of touring caravans were obtained from existing planning permission history and/or authorised site licenses for every authorised touring site in the County. Note that in some cases sites may have a combined planning permission or site license for both touring caravan and tent units.

¹⁰ Occasionally the figure provided by site staff for touring units did not distinguish between touring caravans and tents therefore some figures could have included tents.

¹¹ The PCNPA data has been collected using aerial photography taken in 2006 and therefore the number of touring caravans is likely to vary greatly depending on when the photographs were taken and the limitations associated with this methodology.

both PCC and PCNPA's planning area is shown in the table and graph below based on touring caravan surveys carried out by the individual authorities.





□ 2006 – Survey carried out by PCNPA for touring sites across whole County (PCC and PCNPA) - see Enjoyment Background Paper 2009

■ 2009 – Survey carried out by PCC for sites within PCC planning area 2009.

Overall touring pitch occupancy on sites within PCNP in 2006 show a higher level of occupancy than sites within PCC for both survey dates. The figures show touring pitch occupancy on sites within PCC's planning area was 18% higher in 2009 than in 2006 (based on data from the two surveys).

Levels of Provision by Area

The table below shows the percentage occupancy of touring pitches across the County in each Community Council Area and also by groupings of Community Councils – Area Liaison Forum areas (see Appendix 2). This will allow an idea of the distribution of touring pitch occupancy across PCC's planning area as recorded when the survey was carried out in August 2009. The table gives the total number of touring pitches permitted, the number counted on sites at the time of survey, and available pitches in each Community Council area and then a total for each Area Liaison Forum. The total touring pitch occupancy for the area was 87% in August 2009 leaving a 13% surplus capacity for further touring caravans.

Table 6: Occupancy and Capacity at Touring Sites in PCC's planning area 2009

		No of				
Community	Area Liaison	Touring		On		Percentage
Council	Forum	sites	Permitted	site	Available	Occupancy
Camrose	Mid	1	8	0	8	0%
Nolton and						
Roch	Mid	1	10	8	2	80%
The Havens	Mid	2	83	110	-27	133%*
	Mid Total	4	101	118	-17	117%*
Scleddau	North	1	35	20	15	57%
Solva	North	1	15	10	5	67%
Llanrhian	North	1	40	0	40	0%
	North Total	3	90	30	60	33%
Clunderwen	North East	1	8	0	8	0%
Cwm Gwaun	North East	1	33	17	16	52%
Llandissilio						
West	North East	1	50	63	-13	126%*
Manordeifi	North East	1	20	7	13	35%
	North East Total	4	111	87	24	78%
Pembroke	South	1	30	29	1	97%
Hundleton	South	1	10	0	10	0%
	South Total	2	40	29	11	73%
Amroth	South East	4	183	183	0	100%
East						
Williamston	South East	6	168	189	-21	113%*
Jeffreyston	South East	1	25	24	21	96%
Kilgetty/Begelly	South East	5	200	156	44	78%
Lampeter						
Velfrey	South East	3	90	56	34	62%
Martletwy	South East	1	40	28	12	70%
Narberth	South East	2	80	93	-13	116%*
Penally	South East	3	100	44	56	44%
St Florence	South East	3	75	79	-9	105%*
St Mary Out						
Liberty	South East	3	165	150	15	91%
Templeton	South East	2	49	46	3	94%
Tenby	South East	1	183	183	0	100%
	South East Total	34	1358	1231	142	91%
Llanstadwell	South West	1	25	8	17	32%
	South West					
	Total	1	25	8	17	32%
	Grand Total	48	1725	1503	237	87%

* Indicates touring pitch occupancy exceeding 100%. This is where the numbers of touring caravans on site exceeds the number permitted.

The Caravan and Tent Survey carried out by the Council in August 1998 for both Pembrokeshire County Council and Pembrokeshire Coast National Park. areas found that a total of 2926 touring pitches were permitted on authorised sites across the County (including the National Park). Of this total, 1815 pitches were occupied leaving a total of 1111 available touring pitches (38% of capacity).

For the area of Pembrokeshire County Council (excluding the National Park), there were a total of 1690 touring pitches permitted on authorised sites at the time of the survey. Of this total, 870 touring pitches were occupied at the time of survey leaving a total of 820 touring pitches available in the County in 1998. Therefore, surplus capacity for touring pitches in 1998 was 49%.

In comparison, the 2009 survey has shown an increase in the permitted number of touring pitches in the County (excluding the National Park) which is currently 1725 (+ 35 pitches). Of this number, a total of 1503 touring pitches were occupied at the time of the recent survey leaving a total of 237 touring pitches available in the County (excluding the area of the National Park). The surplus capacity on touring sites in the County (excluding the National Park) for 2009 is 13%. Based on the figures from both surveys, and bearing in mind the increase in touring pitches permitted in the County (excluding the National Park) during this period, there was an increase of 633 additional touring caravans present on sites in August between 1998 and 2009 (1503 in 2009 compared with 870 in 1998 – outside the National Park).

The thematic map below shows the spatial distribution of touring caravan pitch occupancy expressed as a percentage in each ALF area in the County (excluding the National Park).

The map shows that touring pitch occupancy at the time of survey is concentrated in the South East and Mid Area Liaison Forum areas at 91% and 117% pitch occupancy respectively.

This data provides a snapshot of pitch occupancy at the time of survey. The survey was carried out in the first week of August as this is considered the height of summer and peak tourist season for Pembrokeshire. Occupancy levels on sites recorded at the time of survey may have been affected by a number of the following factors:

- Quality of holiday accommodation "offer" and price
- Affordability
- Location of site
- Accessibility
- Weather
- Economic recession



Current Policies

Sites Adjacent to a Settlement

Policies 24, 25, 26 and 27 of the JUDP give reference to sites only being permitted where they are well related, lie adjacent to or are within settlements. 50 out of the 77 sites (65%) in Pembrokeshire County Council's area have been identified as adjacent to or within a settlement. The graph below gives an idea of the number of sites in each ALF area that are adjacent to and not adjacent to a settlement.



Figure 5:

Area Specific Analysis: Sites South and East of A477(T)/A4075 and B4319 and Sites in South East Pembrokeshire

JUDP Policy 24 Touring Caravans and Tent Sites advises that planning permission will not be granted for the development of new caravan and tent sites in the National Park and the area south and east of the A477(T)/A4075 and the B4319. In addition, Policy 27 of the JUDP states that changes of tent sites that have a valid planning permission, or a lawful use, to "unit" pitches (tent, motor caravan and touring vans) will only be permitted if outside the National Park and the area south and east of the A477(T)/A4075 and the B4319 and the site is well related to settlements. Currently, there are 20 out of 77 sites in Pembrokeshire County Council's planning jurisdiction that are within the area south and east of the A477(T)/A407 5 and the B4319. This is just over a $\frac{1}{4}$ of all sites in PCC's planning jurisdiction (26%).

Overall there are a total of 65 touring caravan pitches available out of the 495 pitches permitted on touring sites within the area south and east of the A477(T)/A4075 and the B4319. The total pitch occupancy for these sites at the time of survey is 87% which mean 13% of capacity for touring pitches in the area is surplus. This indicates that there is still capacity, for touring pitches on existing sites within the area the current policy is concerned with.

In analysis of the current locations of caravan sites and pitches, it became apparent that the prevalence of sites and pitches was greatest in South East Pembrokeshire. (See map below.) The maps showing pitches and sites clearly show a very significant proportion of the overall provision is located within a relatively small number of Community Councils. 50% of all permitted touring pitches and 46% of all permitted static pitches (not including those in the National Park) are located in Amroth, East Williamston, Penally, St Florence, St Mary Out Liberty and Tenby Community Councils. When the presence of the sites in the National Park in this location is considered as well, it is apparent that the caravan sites provision in this small part of the County is extremely significant.

Evidence from the Countryside Council for Wales' LANDMAP methodology (See Figure X) indicates that the South East of the County is of a similar scenic quality (moderate) to much of the rest of the County (excluding the area of the National Park). Given the high level of caravan sites and pitches in these few community councils, in comparison with the rest of the County, an approach which limits further growth in these Community Councils (shown in hatching on the next page) is recommended in order to protect landscape quality. In addition consideration should be given to potentially limiting new sites in areas of outstanding scenic quality.





Source: PCC Paper LANDMAP Summary Report January 2009¹²

The map illustrates that in the evaluation of scenic quality using the 2003 LANDMAP methodology, the majority of Pembrokeshire, with the exclusion of the Pembrokeshire Coast National Park (shown in yellow), is classified as moderately important, with areas of high regional importance east of the Cleddau river, in coastal areas and on the Preseli Mountains. The area south of Haverfordwest is classified as low in terms of scenic quality. There are some limited areas of outstanding scenic quality within PCC's area of planning jurisdiction.

¹² For further information on LANDMAP see full LANDMAP Summary Report available on <u>www.pembrokeshire.gov.uk/planning</u> under Emerging Local Development Plan Evidence Base.

Retail Facilities on Touring Sites

Policy 28 of the current development plan for Pembrokeshire, the JUDP, relates to "site facilities on tent, chalet and caravan sites". As part of the touring caravan and tent survey carried out in August 2009, information regarding the facilities on the sites surveyed was also collected.

The existing Policy 28 of the JUDP states that the development of retail and other facilities on tent, chalet and caravan sites will be permitted where:

"it can be demonstrated that the facility is not already available in the vicinity; and the scale and design of the facility is in keeping with the character of the surrounding area; and the vitality and viability of retailing and services of nearby settlements are not adversely affected."

Paragraph 5.2.36 of the JUDP states that a balance must be achieved between the need to maintain or improve the quality of facilities on site, and the need to safeguard existing facilities of nearby settlements.

In response to this policy a small survey of facilities on touring and tent sites in the County was carried out. Specifically, the presence of a site shop on those sites surveyed was recorded. The results are shown in the graph below.

Figure 6:



Camping in PCC planning area

Meaningful data for assessing the level of occupancy of accommodation sites for tented accommodation is not as readily available as data for touring and static caravans. This is since certain accommodation sites do not have a maximum permitted number of tents or they may have a combined licence for "touring units", where a touring unit may include tents and touring caravans. The survey was only carried out on sites with planning permission and does not include sites exempted under the Camping and Caravan Club Exemptions. Despite the lack of available data regarding the planning permission and site licenses for tents on accommodation sites in the County, the survey carried out in August 2009 also counted tents on each of the sites. The figures and levels of occupancy for tented accommodation are shown in the table below:

I able 8						
Community	Area Liaison	No of	Demositte el	On	Australia	Percentage Pitch
Council	Forum	Sites	Permitted	site	Available	Occupancy
Nolton and	Mid	1	10	6	4	60%
Roch	-	2		44		
The Havens	Mid		83		39	53%
	Mid Total	3	93	50	43	54%
Scleddau	North	1	10	10	0	100%
Solva	North	1	15	6	9	40%
	North Total	2	25	16	9	64%
Manordeifi	North East	1	20	0	20	0%
Clunderwen	North East	1	8	0	8	0%
Cwm Gwaun	North East	1	33	6	27	18%
Llandissilio						
West	North East	1	20	0	20	0%
	North East					
	Total	4	81	6	75	7%
Pembroke	South	1	30	28	2	93%
	South Total	1	30	28	2	93%
Amroth	South East	2	152	61	91	40%
East						
Williamston	South East	2	55	3	52	5%
Kilgetty/Begelly	South East	2	20	6	14	30%
Lampeter						
Velfrey	South East	1	20	0	20	0%
St Florence	South East	2	25	25	0	100%
St Mary Out						
Liberty	South East	2	140	38	102	27%
Templeton	South East	1	45	3	42	7%
Tenby	South East	1	100	100	0	100%
	South East					
	Total	13	557	236	321	42%

Table 8:

Llanstadwell	South West	1	25	2	23	8%
	South West					
	Total	1	25	2	23	8%
	Grand Total	24	811	338	473	42%

Note: The figure for the number of tents permitted on sites has been used if this information has been available from the relevant site licences or planning permissions. Where these figures have not been available the combined figure for "touring units" has been used instead to represent the number of tents permitted.

There are 24 sites out of the 48 touring sites surveyed that have permission or licences for tent accommodation. The greatest proportion of camping sites is in the South East with a total 42% occupancy recorded on sites in this ALF area. The highest level of tent occupancy was in the South ALF area with an occupancy level of 93%. The lowest level of occupancy was recorded in the North East at 7%.

The overall camping occupancy on sites in the County was 42% at the time of survey. This is a low level of occupancy considering the time of year however the figure could have been affected by the following:

Weather – there was rainfall during the week the survey was carried out. This may have impacted on the numbers using campsites as this type of holiday accommodation is often dependent on good weather conditions. In addition to this, the survey was carried out on weekdays, whereas particularly for tents, occupancy may be higher on weekends.

Limitations to the survey methodology – As noted above the difficulty in obtaining data: permissions and licences for tents and the use of combined "touring units" permitted in their place could have created a limited degree of inaccuracy in the results obtained.

Number of people on touring and tent sites in PCC's planning area at time of survey (August 2009)

As part of the survey of touring and tent sites in PCC's planning area carried out in August 2009, where available, information regarding the number of people on sites at the time of survey was obtained from site staff. Frequently, exact information regarding the number of people on site at this time was not available. Instead, a number of site staff on different sites in the County quoted a typical number of 4 people per touring unit. Based on this estimate and considering the total number of touring caravans and tents counted at the time of survey the calculation below gives an estimate as to how many people were occupying touring or tent pitches.

No of people on touring sites = No of units counted x 4 $1503 \text{ x } 4 = \underline{6012}$

A list of all the sites surveyed for the purposes of this report can be viewed in Appendix 1.

Additional Survey Data

The following additional data was collected for the purposes of this report and can be viewed in Appendix 3:

Thematic map showing caravan and camping pitch occupancy on all accommodation type sites in PCC's planning area.

Summary and Recommendations for Touring and Camping Sites

The monitoring of Touring and Camping sites demonstrated an increase in levels of occupancy of touring sites since 1998 (49%) and since the 2006 PCNPA (67%) survey to the 2009 survey results of 87%. Monitoring also revealed that a high proportion of sites are currently adjacent to an existing settlement and many of the sites particularly in the South East Area Liaison Forum offer retail facilities as part of their site offer.

In terms of spatial location of sites and pitches, there is a prevalence of touring caravan and camping sites in the South East Area Liaison Forum area in a small number of Community Councils. 50% of all permitted touring pitches (not including those in the National Park) are located in Amroth, East Williamston, Penally, St Florence, St Mary Out Liberty and Tenby Community Councils. When the presence of the static pitches in this area and sites in the National Park in this location is considered as well, it is apparent that the number of caravan sites and pitches in this small part of the County are extremely significant. Given the visual impact that a concentration of this kind has and the potential impact on the landscape, a policy approach restricting new touring sites and extensions to pitch numbers of existing touring sites in these Community Councils is justified.

A high proportion (65%) of existing sites are considered to be well related or adjacent to settlements. This is important because it maximizes the potential that visitors will visit nearby settlements and use facilities such as restaurants and pubs, thereby contributing to the local economy and also be able to access other attractions through the use of public transport. .Ideally visitors should be within comfortable walking distance of these facilities. Sometimes retail and other facilities on caravan sites also serve local residents The JUDP recommended that new sites should be well related to settlements. In order to maximize sustainability (a key aim and objective of both national tourism strategy and PCC tourism strategy) it is recommended that new sites only be supported where they are well related to settlements identified as service centres, service villages or towns in the LDP hierarchy. These are settlements identified as having a service provision that is able to meet the day-to-day needs of its population. This approach recognizes the potential benefit that touring sites can bring but also seeks to minimize landscape impact. It will encourage development where it will be visually well-related to the existing settlement and will be sustainable in encouraging the use of that settlement's facilities. It may be appropriate to consider a more flexible policy approach for existing sites.

Monitoring of the LDP should look at numbers of new pitches given consent and whether consents for new sites are well-related to settlements within the LDP hierarchy.

Summary of Recommendations

This report has looked at a range of datasets and analysis for caravan provision. In looking at Static Caravan trends, the evidence is that full occupancy of existing residential and static caravans is not being achieved, although high levels of occupancy are achieved in peak season. Evidence from planning permissions demonstrates that there is surplus capacity for 393 additional static and residential caravans to be added to existing pitches across the PCC area.

Given the visual impact of static caravans on the landscape and the existing availability of pitches that are currently not occupied, a policy approach maintaining the approach of preventing new static sites and extensions to static sites is recommended. This consideration, added to potential landscape impacts and the evidence of existing capacity on current sites means that the recommendation of this report is to maintain the JUDP approach preventing new static caravan sites and pitches. Given the fact that there is an uneven distribution of static pitches however, consideration should be given to a policy approach similar to that of the JUDP which would enable the upgrading of pitches on existing touring sites to static pitches, in appropriate locations.

On touring sites and camping sites, trends demonstrate that there is existing capacity on sites at present, although occupancy levels have been rising. Given the positive benefits that tourism can bring to the local economy and the lesser landscape impact of touring sites, a policy approach allowing new sites where the location is well related to a settlement with services, as identified in the LDP hierarchy, is recommended. A different policy approach for extensions to existing sites could be considered, providing sufficient landscaping could be provided. Monitoring demonstrated however, that in a small number of community councils near to the National Park in the South East of the county an already high number of sites and pitches exist. It is recommended that no new touring sites or extensions to sites be permitted in the following community councils: Amroth, East Williamston, Penally, St Florence, St Mary Out Liberty and Tenby.

Appendices

Appendix 1

List of all Caravan Sites in Survey

			Community
Name	Address	Postcode	Council
Woodview	Llanteg	SA67 8QJ	Amroth
Little Kings Park	Narberth	SA67 8PG	Amroth
Rose Park	Llanteg	SA67 8QJ	Amroth
New Inn	Amroth	SA67 8NW	Amroth
Pantglas Farm	Tavernspit	SA34 0NL	Amroth
Starre Gorse	Stepaside	SA67 8LR	Amroth
	Wisemans		
Pleasant Valley	В	SA67 8NY	Amroth
Brawdy farm	Brawdy	SA62 6LA	Brawdy
Park Hall	Pen Y Cwm	SA62 6LT	Brawdy
	Trefgarn-		
Trefgarn Owen	Owen	SA62 6NF	Brawdy
	Pelcomb		
Rising Sun	Bridge	SA62 6EA	Camrose
Scamford	Keeston	SA62 6HN	Camrose
Castle Farm	Keeston	SA62 6ED	Camrose
Hazelbrook	Sageston	SA70 8SY	Carew
Derwenlas	Llandissil	SA667SU	Clunderwen
Grondre Vale	Grondre	SA667HD	Clunderwen
Gwaun Vale	Llanychaer	SA65 9TA	Cwm Gwaun
Cross Park	Broadmoor	SA68 0RN	East Williamston
Greenacres	Kilgetty	SA68 0QW	East Williamston
Morgans Lodge	Broadmoor	SA68 0RN	East Williamston
Myrtle Cottage	Broadmoor	SA68 0RW	East Williamston
Overdene	Wooden	SA69 9DY	East Williamston
Sunnyvale	Saundersfo	SA69 9BP	East Williamston
Masterland Farm	Broadmoor	SA68 0RH	East Williamston
Hill Park	Pentlepoir	SA69 9BH	East Williamston
			Fishguard and
Fishguard	Fishguard	SA65 9JH	Goodwick
Scotchwell	Haverfordw	SA624PA	Haverfordwest
Ashford	Hundleton	SA71 5RD	Hundleton
Hungerford	Loveston	SA68 0NY	Jeffreyston
Blackmoor	Ludchurch	SA67 8JH	Kilgetty/Begelly
Mill House	Stepaside	SA67 8LN	Kilgetty/Begelly
Ryelands	Kilgetty	SA68 0UY	Kilgetty/Begelly
Croft	Reynalton	SA68 0PE	Kilgetty/Begelly
Beachdean	Reynalton	SA68 0PE	Kilgetty/Begelly
Shillingford	Kilgetty	SA68 0UG	Kilgetty/Begelly
Stone Pit	Begelly	SA68 0XE	Kilgetty/Begelly

Tucking Mill Stepaside SA67 8JS Kilgetty/Begelly South Tavernspit SA34 0NL Lampeter Velfrey Redford Narberth SA67 8TD Lampeter Velfrey Woodland Vale Ludchurch SA67 8TD Lampeter Velfrey Llandissillio Clynderwen SA62 4NG Llangwm Torbant Croesgoch SA62 4NG Llangwm Shipping Farm Milford Ha SA731JE Llanstadwell Glancleddau Llancefn Clynderwen SA66 7JF Maenclochog Pernalitlyn Llechryd SA43 2PR Manordeffi Nolton Cross Haverfordw SA62 3NP Nolton and Roch New Park Farm Landshippi SA67 7ED Narberth Nolbe Court Narberth SA67 7ED Narberth Noble Court Narberth SA67 7ED <th>Trees</th> <th>Stepaside</th> <th>SA67 8NS</th> <th>Kilgetty/Begelly</th>	Trees	Stepaside	SA67 8NS	Kilgetty/Begelly
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Appendix 2 Map of Community Councils

Area Liaison Forum areas, by colour: Red = North, Blue = North East, Green = Mid Pembrokeshire, Orange = South West, Purple = South, Pink = South East



Appendix 3 Caravan Pitch Occupancy on All Caravan Sites