

Potential site analysis for site 377, Tenby - Brynhir

Associated settlement **Tenby**
LDP settlement tier **Local service and tourism centres**
Community Council area **Tenby**
Site area (hectares) **6.35**

Site register reference(s) (if proposed as development site for LDP) No LDP site registration

Relationship to designated areas

Within 500 metres of a SAC.

Not within 500 metres of a SPA.

Not within 500 metres of a National Nature Reserve.

Not within 100 metres of a Local Nature Reserve.

Not within 500 metres of a Marine Nature Reserve.

Not within 100 metres of a Woodland Trust Nature Reserve.

Not within 100 metres of a Wildlife Trust Nature Reserve.

Not within 100 metres of Access Land.

Not within 100 metres of a Scheduled Ancient Monument.

Not within 50 metres of a Listed Building.

Not within 500 metres of a Historic Landscape Area.

Not within 100 metres of a Historic Garden.

Within 50 metres of Contaminated Land.

Not within airfield safeguarding zones for buildings under 15m high.

Not within HSE safeguarding zones.

Not within MoD safeguarding zones for buildings under 15m high.

Site includes a Tree Protection Order.

Not within 100 metres of ancient or semi-natural woodland.

Underlying Agricultural Land Classification: 3 (1 is Agriculturally most valuable, 5 is least valuable).

Not within a quarry buffer zone.

Not within safeguarded route for roads or cycleways.

Site includes Public Right of Way.

Not a Village Green.

Stage one commentary

Site is not wholly within a Site of Special Scientific Interest; Natura 2000 site; National, Local, Marine, Woodland Trust or Wildlife Trust nature reserve; or Scheduled Ancient Monument.

Does the site pass stage one site criteria tests? **Yes**

Stage two evaluation

Ownership	Pembrokeshire County Council		
General overview	The site forms an extensive area of agricultural land to the north of Tenby with mature hedged boundaries.		
Greenfield or Brownfield/PDL	Greenfield	Estimated number of dwellings	168
Adjoining uses and access	There is residential development to the west and to part of the north of the site. Slippery Back Lane and agricultural development lies to the east. There is also some agricultural land to the north. The southern boundary is separated from the existing cemetery by a triangular field. Access is expected to be from existing residential areas.		
Visible constraints to development	The site boundaries and areas within the site are subject to TPO.		
Impact on National Park's Special Qualities	The special qualities of Tenby emanate from its traditional urban character, typified by the Georgian architecture, old town walls and castle, all of which contribute to its very strong sense of place. There is a distinctive coastal typography with an intimate association between the town and the shore. Preservation of the traditional coastal town character is key and can be achieved through developments which are in keeping with the character of the traditional built form. . Containment of the site by planting and the design of development will be important in relation to the preservation and the enhancement of the character of Tenby.		
Landscape impact mitigation measures	Need to retain existing boundaries and trees within the site.		
Affordable housing capacity assessment	See the Housing Background Paper, Appendices 1, 2, and 3, for an evaluation of the affordable housing potential for this site.		
General notes	The site has significant archaeological potential and survey work has been undertaken as part of preparation for development under the JUDP. The JUDP allocation seeks 120 dwellings. A higher density should be achieved in line with current approaches to the best use of land, notwithstanding that not all of the site may be suitable for development due to important archaeology, and TPOs at the site. Phasing is proposed to help the development be absorbed within the town. The site has been extended to the south to include land north of the Tenby cemetery which will assist with the open space contribution at the site.		
Development planning history	Allocated as Residential in Local Plan ----- Subject to objection 926D215 during UDP process ----- Wholly within area designated as Residential Allocation in JUDP		

Planning application history (planning applications within, overlapping or adjacent to the potential site)

Application code	Application type	Proposal	Decision	Decision date
99/171	FULL	Extension and use of garage as playroom	APP	27-May-1999
99/427	FULL	Change of use to garden & variation of Condition 4 of NP/99/282	APP	14-Dec-1999

Summary of geological risk (class A is lowest risk, class E is highest risk)

Running sand class A; compressible ground class A; landslide class C; no soluble rocks; shrink swell class A

Summary of flood risk (from TAN 15)

Not within a TAN 15 zone

Public transport service Services at least hourly, six days a week, including journeys suitable for travel to and from work, schools, morning and afternoon shopping.

Distance from potential sites to selected services in kilometres

Nearest shop	1.21	Nearest doctor	0.72
Nearest pub	0.77	Nearest Dentist	1.07
Nearest primary school	0.88	Nearest secondary school	1.01
Nearest post office	1.08	Nearest petrol station	0.82
Nearest community hall	0.95	Nearest police station	1.14
Nearest letter box	0.17	Nearest library	0.95
Nearest place of worship	0.83	Nearest cash point	0.75
Nearest sports ground	0.93		

* Distances are in kilometres, 'as the crow flies'

Consultee responses

Consultee	Date of response	Response
Dwr Cymru	29/11/2007	Have had some discussion with developer's consultant. Study required on treatment works to look at any necessary upgrading and impact assessment. Study also needed to assess if the network is capable of capacity. Both studies would need to be undertaken at the developer's expense.
Countryside Council for Wales	26/11/2007	No adverse comments
Environment Agency Wales	18/10/2008	Concerns about possible large allocation for town - implication actions for settlement infrastructure. EAW consider that a Sustainable Urban Drainage is necessary for Tenby due to the extensive proposals for this settlement. General concerns about sewer system capacity/flows - advice from Dwr Cymru needed. Large site - SuDs required and possible surface water problems.

PCC Highways	15/11/2007	Principle established and access agreed. No access from Slippery Back.
Dyfed Archaeology	30/05/2008	Site adjacent to Prehistoric Enclosure and important Medieval Holloway. Pre Planning evaluation concluded that several features were present. Sites including either known or probable remains, which should be preserved and incorporated into, appropriate development designs. Sites within this category are unlikely to prevent development, however any impact upon archaeological remains will require appropriate mitigation. This is likely to include the retention of features where possible, and the investigation, recording and analysis of all threatened remains.

Reasons site is suitable for development

The site forms an existing residential allocation within the Joint Unitary Development Plan, and whilst this development has yet to come forward, the site remains a suitable location for residential development. Exploring the potential for increased number of units at the site should take account of the TPOs and archaeological potential at the site. A study is required in relation to treatment works, upgrading and impact assessment. EAW consider that SuDs is necessary.

Reasons site is not suitable for development

Does the site pass stage two tests? Yes **Proposed use** Housing

Stage three: Sustainability Appraisal

Sustainability Objective	Summary	Commentary
1	0	This site is greenfield and in use for agriculture, although it is not the highest grades of agricultural land
2	++	This site is within walking distance of a full range of services at Tenby.
3	+	High standards of design and layout are needed for this site which is at the edge of Tenby
4	0	Though the development will increase the population and therefore the pool of residents that could be taking part in physical recreation, the Sustainability Objective seeks a change in behaviour such that a greater proportion of residents and non-residents are taking part in physical recreation in the Park, and therefore enjoying the health benefits.
5	0	The development will not achieve this aim
6	+	This site is not within an area liable to flooding. Sustainable Urban Drainage will help to reduce the drainage impact of the development. Design should incorporate energy efficiency and sustainable design principles.
7	+	Housing will be built according to the sustainable design policies of the Plan requiring the highest standards for energy efficiency.
8	++	The site can be used to accommodate a range of housing, including,

		when needed, as much affordable housing that can be achieved. Development will also help to sustain services locally.
9	+	The site can be used to accommodate identified need for affordable housing.
10	+	A significant number of dwellings can be accommodated within this site. Phasing will be needed to ensure the impact on the community and culture is protected. A positive outcome is dependent on a large proportion of the housing being available at an affordable rate to people from within the community.
11	0	Development of an individual site is irrelevant to this Sustainability Objective, as its goal is to avoid negative effects of minerals acquisition wherever and whatever the use of those mineral products.
12	0	Development here is likely to marginally increase waste, though this inevitable and the only way to avoid this would be to have no development and no increase in population (in or outside the Park, as displacement of the waste generation would not eliminate its harmful effects).
13	+	The Authority does not have SPG in place on developer contributions. No needs other than those identified by statutory consultees are currently apparent.
14	+	There may be opportunities for habitat maintenance and creation within the site through the planning process
15		Policy 17, Sustainable Design aims to make efficient use of water resources. Issues relating to water quality are addressed at Stage 2 and through the Habitats Regulation Screening and Assessment at Stage 5.

Overall Sustainability Appraisal

This site is within walking distance of a good range of services at Tenby. Plan policy to secure as much affordable housing as can be achieved and is needed will help ensure development meets the needs of local communities and offers the opportunity to live in the National Park to as wide a section of the population as possible. The housing built will meet the highest standards for energy efficiency due to the sustainable design policies of the Plan.

Is the site acceptable for development after Sustainability Appraisal Yes

Stage four: compatibility with the Preferred Strategy

Is site within or adjacent to named centre?	Yes.
Is the proposed use listed as appropriate for the centre?	Yes the proposed uses accord with the types of development considered appropriate for the centre.
Is the provision consistent with the scale of development proposed for	In terms of housing provision, overall the provision levels are within the Welsh Assembly Government projection figures. When looking at each tier: For Tenby (Tier 2 - Local Service and Tourism Centre there is a slight over provision when the projection figures are used for comparison (521 = household growth between 2001 and 2021 versus 537 provision plus completions since 2001). This could provide the Authority with an opportunity to reduce the provision, for example, by taking out, for example, the Reservoir Site (Ref 760) or West of Narberth Road (Site Ref 727) if the remaining provision can be carried forward into the Deposit Plan.

This site could be phased to aid absorption into the Town.

Is the provision meeting an identified need in the centre? Yes it is helping to meet the Welsh Assembly Government household projection for the Centre.

If greenfield, are there sufficient brownfield sites to avoid choosing this one? The site is a greenfield site. There would not be sufficient land provided on brownfield sites if this site was excluded.

Overall stage 4 assessment

The site is within or adjacent to named centre in the Strategy. A use is proposed which is considered appropriate as per the Strategy. Tenby's opportunities for growth have become increasingly limited and the completion rates have reduced over recent years. Given the scale of the existing settlement this level of growth could be absorbed without detriment. To assist with this absorption Brynhir has been phased – see Table 8 Deposit Plan. Infrastructural costs will need to be taken into account. Other sites are either small in number or would be difficult to phase, for example Butts Field car park.

There is an over provision when the 2003 based projection figures are used for comparison (521 = household growth between 2001 and 2021 versus 697 provision plus completions since 2001). Given the difficulties in finding suitable sites in Saundersfoot this should help compensate.

Is the site compatible with the preferred strategy? Yes

Stage Five: Habitat Regulations Assessment

For more information see the Habitats Regulations Screening and Appropriate Assessment reports

The site is within 500m of Carmarthen Bay and Estuaries SAC. There is the potential for increased recreational pressure on the Large Shallow Inlet and Bays and Intertidal Mudflats and sand flats of Carmarthen Bay & Estuaries SAC. However, this is not likely to have significant effects on these designations as they are not considered to be vulnerable to recreational pressure.

Carmarthen Bay SPA is 1-1.2km offshore and is designated for the Common Scoter. Increased recreational use of boats has the potential to cause disturbance to the Common Scoter on their feeding grounds. One of the conservation objectives for the Common Scoter is that “they are allowed to inhabit their feeding grounds and resting areas with minimum disturbance and no disturbance on their moulting ground at Cefn Sidan, and may move unhindered between them³”. Any increase in water based recreation within the Common Scoter’s feeding grounds has the potential to have significant effects on Carmarthen Bay SPA.

This allocation is unlikely to have a significant effect on abstraction levels as the Cleddau and Pembrokeshire Coastal Rivers CAMS (Updated 2007) identified as having ‘water available’ for abstraction. Dwr Cymru’s (21/07/08) response to the site allocations consultation states that, “based on future demands already shared with us we do not foresee any problems at present in meeting the anticipated domestic demands during the life of the Local Development Plan”. EAW expressed concerns about the large amount of development proposed for Tenby and the implications for infrastructure, such as sewer system capacity/ flows. A study is to be carried out in relation to treatment works, upgrading and impact assessment in regard to this site. Changes in water quality are unlikely to have significant effects on Carmarthen Bay & Estuaries SAC and Carmarthen Bay SPA as they are both large sites and Carmarthen Bay is assessed by the EA under the WFD as being ‘probably not at risk’ from diffuse source pollution and point source pollution (Available online).

This site is less than 1km away from Beech Cottage Waterwynch SSSI, which is a Lesser Horseshoe Bat maternity roost site which forms part of the Pembrokeshire Bat Sites and Bosherton Lakes SAC. Potential effects of this allocation on the Greater Horseshoe Bats include increased disturbance, especially during construction, which can cause an increase in noise, fumes and lights. There is also the potential for increased levels of traffic along the A478. The Pembrokeshire Bat Sites and Bosherton Lakes SAC Management Plan⁴ indicates that within 1km of roosts it is vital to retain wooded areas and vegetation cover (including scrub), and habitat

links i.e. woodland, tree lines, hedgerows and even limited sections of walls and fences.

Potential effects:

Increased Disturbance - disturbance to the Lesser Horseshoe Bat and to the Common Scoter on their feeding grounds;

Reduced Water Quality - Sewerage capacity/ flow;

Loss of Foraging Habitat - Lesser Horseshoe Bat

The Appropriate Assessment concluded no adverse effect on integrity as policies within the LDP contain suitable protection and mitigation measures to reduce potential impacts on the water environment, and the development proposed in the LDP is within existing settlement boundaries and the current condition status of the greater and lesser horseshoe bats is favourable: maintained.