

## Potential site analysis for site 707, White Lion St/Deer Park, Tenby

Associated settlement	<b>Tenby</b>
LDP settlement tier	<b>Local service and tourism centres</b>
Community Council area	<b>Tenby</b>
Site area (hectares)	<b>0.49</b>

**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.

Within 100 metres of a Scheduled Ancient Monument.

Within a Listed Building.

Not within 500 metres of a Historic Landscape Area.

Not within 100 metres of a Historic Garden.

Not 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.

Not within 10 metres of a Tree Protection Order.

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

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

Not within a quarry buffer zone.

Not within safeguarded route for roads or cycleways.

No 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

<b>Ownership</b>	Various		
<b>General overview</b>	Site comprises two areas - the Royal Gatehouse Hotel, adjacent cinema and parking and garaging, and the site of the White Lion Hotel.		
<b>Greenfield or Brownfield/PDL</b>	Brownfield/PDL	<b>Estimated number of dwellings</b>	74
<b>Adjoining uses and access</b>	Site fronts onto the North Beach amenity area, and otherwise fronts onto existing development within or adjacent to the historic core of Tenby old walls. Access off White Lion Street or Deer Park		
<b>Visible constraints to development</b>	These buildings clearly have a significant presence in the street scene and historical significance which must be sympathetically taken into account in any redevelopment scheme.		
<b>Impact on National Park's Special Qualities</b>	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. The development of this site has the potential to be significant contribution to the special qualities of Tenby, particularly its historic and seaside character, and will require very special consideration in relation to the listed and historic buildings located within and surrounding the site.		
<b>Landscape impact mitigation measures</b>			
<b>Affordable housing capacity assessment</b>	Site not assessed for affordable housing capacity.		
<b>General notes</b>	The site is part of a planning application redevelopment proposal (09/043), received by the Authority January 2009. The number of residential units included within the redevelopment scheme, provide for 76 units. The application has been withdrawn. (The allocation for 74 units reflects previous estimates). Further units are possible. Most of the site lies within the Conservation area, and there are listed buildings here. A quality, sensitive redevelopment is therefore required. The figures contained within the Local Development Plan for this allocation site relate to earlier proposals by the developer which included a cinema and apartments at Milford House and Keny House with the Royal Gatehouse lost (this loss was proven at the time). The White Lion Hotel being extended and refurbished.		

## Development planning history

Subject to objection 727D5 during UDP process ----- Partly in or adjacent to area designated as TownCentre in JUDP

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

Application code	Application type	Proposal	Decision	Decision date
CS/042	CS	Enforcement Notice Correspondence		
98/457	LB	Refurbishment of frontages	APP	24-Feb-1999
99/430	FULL	Use part of existing premises to accommodate small seating area for serving teas, coffee & cold snacks	APP	01-Nov-1999
00/230	LB	Internal alterations to improve function room	APP	16-Aug-2000
01/139	FULL	Change of use of ground floor room to art gallery	APP	08-May-2001
01/241	FULL	Kitchen & bathroom alterations & porch	APP	10-Jul-2001
02/434	FULL	Rebuild stone wall incorporating vehicle & pedestrian access	WD	09-Oct-2002
03/489	FULL	Change of use to residential	APP	02-Dec-2003
03/641	LB	Alterations & change of use from retail to residential	APP	03-Sep-2004
03/640	FULL	Alterations and change of use from retail to residential	APP	26-Jan-2004
03/645	FULL	Change of use to residential	WD	30-Sep-2005
04/377	FULL	Replacement boundary wall, new patient car park with owners garage and flat	WD	24-Aug-2004
04/490	FULL	Rebuilding of Listed Garden Wall with Vehicular/pedestrian access	WD	19-Oct-2004
05/070	FULL	Rebuild stone wall	REF	28-Apr-2005
05/071	LB	Rebuild stone wall	REF	28-Apr-2005
05/634	FULL	Reinstatement of boundary wall	CAN	29-Nov-2005
05/635	LB	Reinstatement of boundary wall	CAN	22-Nov-2005
06/327	LB	4m flagpole encompassing 3 no. antennae together with proposed access hatch & platform	REF	07-Aug-2006
06/326	FULL	4m flagpole encompassing 3 no. antennae together with proposed access hatch & platform	REF	07-Aug-2006
06/567	FULL	Extend retail area on ground floor & change of use of 1st & 2nd floors to storage	APP	04-Jan-2007
07/160	FULL	New shop front with new separate access door to flat over.	APP	09-May-2007
07/472	FULL	Change of use to dwelling	APP	20-Nov-2007

08/018	FULL	Conversion of the former Royal Gatehouse Hotel to apartments; demolition of Milford & Kent Houses & construction of new apartments; demolition of rear annexes to former Royal Gatehouse Hotel & construction of basement/ground floor car park with new apartment building above; demolition of annex to rear of cinema; demolition of industrial building to the rear of Clifton Rock & construction of 5 town houses; demolition of former garage buildings fronting Deer Park & construction of new apartments	WD	05-Feb-2009
08/014	LB	Demolition of rear annexes	WD	05-Feb-2009
08/017	LB	Demolition of Milford & Kent Houses; demolition of rear annexes to former Royal Gatehouse hotel; demolition of annex to rear of Cinema; demolition of industrial building to the rear of Clifton Rock; demolition of former garage buildings fronting Deer Park	WD	05-Feb-2009
08/015	FULL	Demolition of rear annexes, alterations & extensions to create enhanced hotel accommodation & conference facilities; creation of 3 no self-contained retail units at ground floor	WD	05-Feb-2009
08/272	CA	Demolish building damaged by fire	APP	18-Sep-2008
08/302	LB	Demolition of building	WD	05-Feb-2009
09/011	FULL	Proposed residential development of 3 townhouses with on site car parking and amenity facilities	WD	16-Jun-2009
09/014	FULL	Demolition of rear annexes, alterations & extensions to create enhanced hotel accommodation & conference facilities, creation of 3 no. self contained retail units at ground floor	WD	16-Jun-2009
09/012	FULL	Proposed residential development comprising 59 apartments (37 x 1b; 22 x 2b) with on site amenity facilities, basement car parking, cycle storage & refuse storage facilities. Ground floor commercial development comprising 2 retail units	WD	16-Jun-2009
09/013	FULL	Construction of residential development comprising 17 affordable apartments with on-site car parking, bin store and refuse facilities (14 x 1 bed; 3 x 2 bed)	WD	16-Jun-2009
09/016	LB	Part demolition of existing Playhouse Cinema building. Proposed commercial/retail/leisure development comprising 4 retail units & cinema	WD	16-Jun-2009

09/015	FULL	Part demolition of existing cinema - proposed commercial/retail/leisure development comprising 4 retail units and a cinema	WD	16-Jun-2009
09/043	LB	Demolition of rear annexes, alterations & extensions to create enhanced hotel accommodation & conference facilities, creation of 3 self-contained retail units at ground floor	WD	16-Jun-2009
09/246	FULL	Café culture	APP	15-Jul-2009

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

Running sand class A; compressible ground class A; landslide class B; soluble rock class E; 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	0.24	Nearest doctor	0.35
Nearest pub	0.09	Nearest Dentist	0.27
Nearest primary school	0.19	Nearest secondary school	0.75
Nearest post office	0.08	Nearest petrol station	0.44
Nearest community hall	0.22	Nearest police station	0.14
Nearest letter box	0.06	Nearest library	0.22
Nearest place of worship	0.07	Nearest cash point	0.18
Nearest sports ground	0.61		

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

### Consultee responses

Consultee	Date of response	Response
Dwr Cymru	29/11/2007	Issues at treatment works but as this is a brownfield site there may be potential to allow development to proceed. Study needed to ascertain whether treatment works and network can cater for proposed development to be funded by developer.
PCC Highways	23/04/2008	General principle that development without additional parking would be acceptable in this location.
Countryside Council for Wales	26/11/2007	No adverse comments

Environment Agency Wales	08/01/2008	Concerns about possible large allocation for town - implication actions for settlement infrastructure. EAW consider that a SUDs is necessary for Tenby due to the extensive proposals for this settlement. General concerns about sewer system capacity/flows - advice from Dwr Cymru needed. Infill - recycling on site waste materials and possible contaminated site.
PCC Highways	23/04/2008	With any redevelopment of the former Hotel site, if parking can now be achieved then it should be accepted.
PCNPA Building Conservation Officer	15/05/2008	Pre-application discussions have taken place on development here, the principle of which I would support. Given the prominence of part of the site along with presence of listed buildings, great detail must be paid to the quality of any development and its impact on the C.A., archeology and surrounding listed buildings.
Dyfed Archaeology	30/05/2008	On the probable site of the Medieval North gate and within an area of extended Medieval settlement associated with the Town of Tenby. Sites with either known or highly probable survival of archaeological remains, the extent, condition and significance of which are not known. These remains are potentially of national importance and further evaluation is therefore required. Sites falling within this category may contain features, which could prevent the development of part or all of the site. Due to this potential we would recommend such sites are not allocated.
Dyfed Archaeology	09/09/2008	Supplementary response - We agree that this site will need to be considered for allocation and development. Archaeology will however be a constraint. WO Circular 60/96 applies.
Pembrokeshire County Council Drainage	26/01/2009	The development of this site would appear not to affect ordinary watercourses. It would be preferable if surface water was disposed to soakaways/SUDS in order not to increase the risk of flooding or exacerbate existing flooding in downstream catchments. If, however, ground conditions are not suitable for the use of soakaways/SUDS or positive drainage systems are required for adoption purposes, then any conventional drainage system discharging to watercourse either directly or indirectly, should include measures to improve the status quo. It should be noted that ordinary watercourses must not be filled in, culverted, or the flow impeded in any manner, without the prior written consent of the Environment Agency under Section 23 Land drainage Act 1991. Approval of Pembrokeshire County Council is also required to culvert a watercourse under Section 265(1) Public Health Act 1936.

**Reasons site is suitable for development**

The site presents a suitable opportunity for sensitive redevelopment within Tenby, bringing under used buildings into commercial and residential use. Further investigations are required however in relation to the sewerage treatment and network capacity, the potential for archaeology will be a consideration and there may also be a requirement for a strategic flood consequence assessment. Early indication of the number of units coming forward through this redevelopment scheme has enabled an increase in the number of units to reflect current

discussions.

**Reasons site is not suitable for development**

Does the site pass stage two tests? Yes

Proposed use Mixed

**Stage three: Sustainability Appraisal**

Sustainability Objective	Summary	Commentary
1	++	This site has existing development within Tenby.
2	++	This site is well located in relation to the main retail and other facilities at Tenby town centre
3	+	Redevelopment of the site, incorporating listed and historic development can enhance the townscape of this part 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. Development 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	+	This site will introduce a moderate number of residential units within Tenby. Other, larger sites have also been identified at Tenby. Phasing will be required to protect the culture of this community. 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.

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| 14 | + | This site is urban in nature, and it is likely that any habitat enhancement will be marginal  |
| 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**

Development of this site would enhance the townscape of 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**

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| Is site within or adjacent to named centre?                                      | Yes  |
| Is the proposed use listed as appropriate for the centre?                        | Yes  |
| Is the provision consistent with the scale of development proposed for           | Yes the site goes towards meeting the housing projection figures for the Centre. The commercial uses would be consistent with uses already in this part of the Town Centre. It would be an important regeneration opportunity. |
| Is the provision meeting an identified need in the centre?                       | Yes see previous response.   |
| If greenfield, are there sufficient brownfield sites to avoid choosing this one? | The proposal is a brownfield site.   |

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. The proposed use accords with the type of use considered appropriate for the various centres. Here in the Plan's largest Centre mixed residential, retail, Cinema and Hotel is proposed. The mixed use proposals are for the redevelopment of brownfield sites of a scale and type compatible with the previous use of the site.

**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

This site is within 500m of Carmarthen Bay & Estuaries SAC and is allocated for a mixed use development, which will include approximately 74 residential units. There is the potential for increased recreational pressure on the Large Shallow Inlet and Bays and Intertidal Mudflats and Sandflats of Carmarthenshire Bay & Estuaries SAC. However, the increase would be minimal and is unlikely to have significant effects on these designations as they are not 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 feeding areas of the



Common Scoter. 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 them<sup>1</sup>”. Any increase in water based recreation within the Common Scoter’s feeding grounds has the potential to have significant effects on Carmarthen Bay SPA.

Dwr Cymru’s (29/11/07) response to the site allocations consultation states that there are possible “issues with treatment works, but as this is a brownfield site there may be potential to allow development to proceed. Study needed to ascertain whether treatment works and network can cater for proposed development to be funded by developer”. 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.

Potential effects:

Increased Disturbance - disturbance to Common Scoter on their feeding grounds;

Reduced Water Quality - Sewerage capacity/ flow.

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.