

Potential site analysis for site 724, Rectory Car Park, Tenby

Associated settlement **Tenby**
LDP settlement tier **Local service and tourism centres**
Community Council area **Tenby**
Site area (hectares) **0.94**

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.

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.

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

| | | | |
|--|---|--------------------------------------|----|
| Ownership | Church in Wales | | |
| General overview | The site forms a pay and display car park at the south western edge of the built area of Tenby. It serves the local hotels as well as tourist car parking. | | |
| Greenfield or Brownfield/PDL | Brownfield/PDL | Estimated number of dwellings | 50 |
| Adjoining uses and access | Residential development lies to the north and west of the site, which is also characterised by serviced accommodation in the form of B& B, Guest Houses and Hotels. To the south an area of public open space separates the car park from the cliff face and south beach. There is a hotel, rectory, road and area of rock face bordering the site to the west. Traffic currently accesses this car park by travelling through the streets of Tenby, or along the promenade / esplanade. | | |
| Visible constraints to development | The need to satisfy essential car parking requirements for this area will form part of any redevelopment proposal. This may be underground parking, or part of the surface area retained for car parking. | | |
| 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. The development of this site has the potential to be significant in relation to the seascape and the built form. The design of the site will therefore be important in relation to the character of Tenby and its conservation area which is adjacent to the site. | | |
| Landscape impact mitigation measures | The front face of the site will need to retain a character in keeping with the existing development along the Esplanade | | |
| 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 form of development however will be sympathetic to the Esplanade, and can obtain a higher density than the site area suggests. Also demand for affordable housing in this area is greatest for 1 and 2 bed units. The figure presented remains an estimate however and will depend upon the suitability of detailed proposals. A reduction in the number of car parking spaces as well as undergrounding may be possible to serve local hotel | | |

needs, although the overall level of car parking provision for Tenby will be an important consideration.

Development planning history

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

| Application code | Application type | Proposal | Decision | Decision date |
|------------------|------------------|--|----------|---------------|
| 98/327 | LB | Enlargement to private bedroom | APP | 28-Sep-1998 |
| 99/319 | FULL | Conversion of existing hotel to 7 apartments with car parking and bin store to rear | APP | 16-Dec-1999 |
| 99/363 | FULL | Outpatients clinic | APP | 27-Sep-1999 |
| 00/154 | FULL | Construction of dormer windows for improved light & access to third floor | APP | 25-May-2000 |
| 00/333 | FULL | Change of use to private residential, alterations to form 10 new flats & 2 new maisonettes | APP | 21-Sep-2000 |
| 00/334 | LB | Alterations to existing building to form 10 new flats and 2 new maisonettes | APP | 16-Oct-2000 |
| 01/534 | FULL | Chiropody Clinic (ROC) | APP | 20-Dec-2001 |
| 01/626 | FULL | Extensions & alterations | APP | 10-Apr-2002 |
| 02/324 | FULL | Minor alterations to previously approved elevations - NP/00/333 | APP | 09-Aug-2002 |
| 02/325 | LB | Minor alterations to previously approved elevations - NP/00/334 | APP | 03-Sep-2002 |
| 02/402 | FULL | Alterations to roof over loft bedrooms | APP | 28-Nov-2002 |
| 02/485 | FULL | Outpatients clinic (ROC) | APP | 28-Nov-2002 |
| 03/424 | FULL | New ticket kiosk | APP | 15-Oct-2003 |
| 04/234 | LB | Alterations to external front entrance level and canopy projection | APP | 19-Aug-2004 |
| 04/235 | FULL | Alterations to external front entrance level & canopy projection | APP | 28-Jul-2004 |
| 04/424 | FULL | 2 projecting balconies & glazed entrance porch | APP | 29-Oct-2004 |
| 07/167 | FULL | Extensions & alterations (ROC) | APP | 09-May-2007 |
| 07/330 | FULL | Conservatory | APP | 10-Aug-2007 |
| 07/524 | FULL | Entrance Porch with WC | APP | 22-Nov-2007 |
| PA/191/09 | PA | Demolish existing building and redevelop with up to 20 (exact number to be decided) apartments | | |
| PA/345/09 | PA | Replacement windows | | |

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 D; 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 | 0.22 | Nearest doctor | 0.76 |
| Nearest pub | 0.26 | Nearest Dentist | 0.38 |
| Nearest primary school | 0.54 | Nearest secondary school | 0.8 |
| Nearest post office | 0.37 | Nearest petrol station | 0.66 |
| Nearest community hall | 0.49 | Nearest police station | 0.31 |
| Nearest letter box | 0.12 | Nearest library | 0.49 |
| Nearest place of worship | 0.2 | Nearest cash point | 0.33 |
| Nearest sports ground | 0.71 | | |

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

Consultee responses

| Consultee | Date of response | Response |
|-------------------------------|------------------|---|
| Dwr Cymru | 29/11/2007 | No objection for 27 units or up to 10% more. Re-consultation needed if proposed units exceed this number. Re consultation (8/10/08) for Rectory car park - Dwr Cymru have no improvements planned. Due to a large number of dwellings – a study will be needed to assess capacity at the Sewage treatment works. The developer will be required to pay for the study. |
| PCC Highways | 20/11/2007 | Access from South Cliff Street. Possibility of access through hospital site from Trafalgar Road. Any loss of parking can be displaced to alternative locations outside Tenby as part of wider Parking/traffic management study. In principle this site would be appropriate for development in the longer term, subject to ongoing consultations over resolving parking issues in Tenby |
| 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 require SUDS approach. General concerns about sewer system capacity/flows - advice from Dwr Cymru needed. Large site - FCA and possible surface water problems. |

PCNPA Building Conservation Officer 15/05/2008 Again, this site has been discussed for some years. Historically, it is an accident that the site was never built on during the Victorian period. My forebears owned and leased land in this area and developed a lot of the streets nearby until the 1880s depressed years slowed progress, resulting in big gap sites such as the bowling green and Rectory Field. The existing car park is of no heritage merit whatsoever and a carefully designed development could provide the last phase of the development of Tenby's south front without detriment to the setting of the C.A.

Although this site has something to offer in traffic management terms, summer traffic still has to pass close by the town centre to access the car park, whereas Butt's Field is more peripheral and easier to access from the main routes into town.

Dyfed Archaeology 30/05/2008 Within close proximity to several sites of archaeological and historical interest. Sites with known evidence suggesting surviving significant archaeological remains. These areas require further assessment such as a desk – top exercise and site visit to clarify if any areas should be excluded from or retained within the development.

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

Redevelopment of this site has the potential to enhance this area of Tenby by providing an extension of the strong architecture along the Esplanade. The car park is not well located to serve the needs of traffic entering Tenby, and whilst residents parking will be required as part of the redevelopment, part of the site can be retained for reduced visitor parking, and consideration of a wider parking and traffic management study. An archaeological assessment may also be required. The form of development however will be sympathetic to the Esplanade, and can obtain a higher density than the site area suggests. Also demand for affordable housing in this area is greatest for 1 and 2 bed units. The figure presented remains an estimate however and will depend upon the suitability of detailed proposals and further consultations.

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 | ++ | This site is an existing carpark within the urban area of Tenby. |
| 2 | ++ | This site is within walking distance of a range of facilities at Tenby. |
| 3 | + | Sensitive redevelopment at this site has the potential to enhance the townscape and to contribute to the strongly defined architecture of the Esplanade |
| 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, in isolation is not likely to impact upon the cultural distinctiveness of Tenby. Other, larger sites have also been proposed, and phasing will be required to ensure that the impact on the culture and community is not threatened. 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 creation within the site as part of 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

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.

Is the provision meeting an identified need in the centre? Yes. Using Welsh Assembly Government household projection figures for Tenby. The slight overprovision issue is addressed in the previous question.

If greenfield, are there sufficient brownfield sites to avoid choosing this one? It 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. 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

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 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 Common Scoter on their feeding grounds.

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. Development is unlikely to have significant effects on water quality in 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).

Dwr Cymru (29/11/07) had "no objection for 27 units or up to 10% more. Reconsultation needed if proposed units exceed this number". The allocation now exceeds this number so potential effects on sewerage capacity/ flow are unknown.

Potential effects:

Increased Disturbance - disturbance to the Common Scoter's 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.