

## Potential site analysis for site 752, Butts Field 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)** 3247/SR65

### 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.

Partly within 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: urban (1 is Agriculturally most valuable, 5 is least valuable).

Not within a quarry buffer zone.

No 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

<b>Ownership</b>	PCC		
<b>General overview</b>	The site forms an existing car park serving Tenby, and the steeply sloping wooded areas which extend to the east and west. It also contains the existing café and toilets to the south of the car park.		
<b>Greenfield or Brownfield/PDL</b>	Brownfield/PDL	<b>Estimated number of dwellings</b>	80
<b>Adjoining uses and access</b>	Immediately to the east and west of the car park, there are steeply sloping wooded areas, beyond these, there are fields to the east, and to the west, North beach and residential development. There are also wooded areas and some development to the north, along with the former reservoir. To the south, a café, toilets and the New Cottage Hospital sit adjacent to the site. Access to the site will be provided via Gas Lane to the south.		
<b>Visible constraints to development</b>	The site is long and relatively narrow. The existing car parking uses should form a full consideration at this site, and will need to be incorporated into any development proposals, possibly as a decked car park. The wooded areas are an important visual and biodiversity feature and should be excluded from development potential here.		
<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. This site is visually well contained by landform and lies adjacent to the conservation area of Tenby. Design will be an important consideration in its relationship with the character of Tenby and the surrounding landform and the potential contribution to special qualities.		
<b>Landscape impact mitigation measures</b>			
<b>Affordable housing capacity assessment</b>	See the Housing Background Paper, Appendices 1, 2, and 3, for an evaluation of the affordable housing potential for this site.		
<b>General notes</b>	The height of development, and therefore the number of storeys will be an important consideration. The number of units should be seen as a general estimate only and this should be seen as indicative and subject to further detailed investigation. The boundary of the site registered by PCC (site reg id 3247/SR65) includes the wooded slopes to the east and west of the car park and is a larger site.		

## Development planning history

Subject to objection 688D3 during UDP process

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

Application code	Application type	Proposal	Decision	Decision date
647/91	RENEW	Car servicing & repairs	APP	23-Jan-1992
544/93	UN	Leisure Park	APP	26-Jan-1994
110/97	FULL	Motor car servicing and repair	ROC	28-Apr-1997
98/444	OL	Leisure Park	APP	01-Nov-1999
02/383	OL	Erection of 16 flats in two storey block with associated car parking and amenity areas	APP	31-Oct-2003
02/638	OL	New healthcare facility	APP	27-Feb-2003
04/339	FULL	New Health Care Facility	APP	16-Sep-2004
07/273	FULL	Interpretation board	APP	26-Jun-2007

## 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	0.82	Nearest doctor	0.28
Nearest pub	0.48	Nearest Dentist	0.74
Nearest primary school	0.51	Nearest secondary school	0.96
Nearest post office	0.65	Nearest petrol station	0.62
Nearest community hall	0.6	Nearest police station	0.72
Nearest letter box	0.07	Nearest library	0.6
Nearest place of worship	0.63	Nearest cash point	0.55
Nearest sports ground	0.82		

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

## Consultee responses

Consultee	Date of response	Response
Dwr Cymru	29/11/2007	Studies required subject to existing flows to be funded by developer.
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 SUDS is necessary for Tenby. General concerns about sewer system capacity/flows - advice from Dwr Cymru needed.
PCC Highways	03/04/2008	With any development, there is a need to retain public car parking. Hence the initial ideas to maintain car parking on the lower floors of any new buildings. Servicing will need to include the extension of the adopted road (Gas Lane) to an adopted turning head at the very least (as there is no turning head now) and the pedestrian footways must safely extend as well.
PCNPA Building Conservation Officer	15/05/2008	This has been discussed for many years now and it is my view that with the seasonal pedestrianization of the town and the need for parking for cars, coaches, park-and-ride as well as a delivery depot, the site is the main key to traffic management in Tenby. It would appear that given the traffic problems of the town, the site has more to offer in this respect than residential development - the nature of the site allows for a substantial multi-storey car park without impact on the C.A. 80 units without consideration of the overall needs of the town is of concern, given that PCC are the owners of the site. Whether the site can accommodate both aspects is a key issue.
Pembrokeshire County Council Drainage	26/01/2009	We are aware of a culverted ordinary watercourse which runs beneath this car park. The layout of any development would need to take account of this culvert in order that access can be maintained for maintenance/future replacement. 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 car park at the site is well contained and development of an appropriate scale could be located at the existing car park with little impact. The wooded areas do not form part of the development potential here. Appropriate access must be achieved along with an appropriate role for public car parking which the Highway Authority confirm must be retained, mirroring concerns of the Building Conservation Officer.

**Reasons site is not suitable for development**

Does the site pass stage two tests? Yes

**Proposed use** Housing

**Stage three: Sustainability Appraisal**

<b>Sustainability Objective</b>	<b>Summary</b>	<b>Commentary</b>
1	++	The site is largely an existing carpark within Tenby, and is not connected with the agricultural sector.
2	++	This site is within walking distance of facilities at Tenby.
3	+	The site is well contained and will have a minimal impact on landscape. The height of the development will be an important factor.
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	+	The site is not within an area liable to flooding. There are significant areas of woodland which should be excluded from the development site to ensure that there is a minimal adverse effect on biodiversity. Development should incorporate energy efficiency and sustainable design principles.
7	+	Housing will be build 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 is a large site, and phasing will be required to ensure that the impact on the cultural distinctiveness of the community is minimised. 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 | + | Development at this site will be limited to the areas forming the existing car park and other development. Existing trees will be retained, and habitat at the car park may be enhanced 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

Development of this site will be restricted to the area of the existing car park to ensure that biodiversity is maintained and habitat not lost. 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.

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

The site is within 500m of Carmarthen Bay & Estuaries SAC. There is the potential for increased recreational pressure on the Large Shallow Inlet and Bays and Intertidal Mudflats and sand flats of Carmarthenshire 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 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 them". Any increase in water based recreation within the Common Scoter's feeding grounds has the potential to have significant effects on Carmarthen Bay SPA.

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).

This site is approximately 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 Plan<sup>6</sup> 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.