

Application Ref: NP/21/0593/FUL

Case Officer	Andrew Richards		
Applicant	Trillium (RMF) Ltd		
Agent	Mr R Mitchell, CarneySweeney		
Proposal	Demolition of existing building & construction of 34 residential units incorporating class A1/A2/A3 and D2 floorspace at ground level & all associated development.		
Site Location	Former Royal Mail Delivery Office, Warren Street, Tenby, Pembrokeshire, SA70 7JR		
Grid Ref			
Date Valid	11-Oct-2021	Target Date	05-Dec-2021

The application was reported to the March Development Management Committee and was deferred to the April Committee for further information to be provided to Members.

At the previous Development Management Committee Meeting, Members raised queries on the possibility of restricting the use of the development to Use Class C3 (primary residence) only and therefore removing permitted development rights to prevent Use Classes C5 and C6 (second home and holiday let).

Members also queried a highway safety issue and the extent to which there would be any limitations on the use of the roof top terrace.

The application was deferred until the next meeting to allow for the implications of imposition of an occupancy control condition to be reported and for the highway safety matters and roof top terrace matters to be addressed.

The report below covers the additional research carried out in relation to occupancy control and proposes a scenario that has been tested to ensure it is financially viable.

A copy of the previous committee report as updated by the officers on condition/informative wording has been attached at the rear of this report as referenced as Appendix A.

The Town and Country Planning (General Permitted Development etc.) (Amendment) (Wales) Order 2022) No.994 (W.211) and No.997 (W.213) Changes to Planning Policy Wales (PPW) section 4.2 Housing regarding: affordability and the impact of second homes and short term lets.

Two new Statutory Instruments were introduced in October 2022 which create new use classes C5 and C6.

The three uses now included are:

- Use class C3 (dwelling houses; used as sole or main residences occupied for more than 183 days in a calendar year).

- Use class C5 (Dwelling houses; used otherwise than as sole or main residences covering a dwellinghouse other than as a sole or main residence and occupied for 183 days or fewer in a calendar year i.e. second homes)
- Use class C6 (Short-term lets, covers the use of a dwellinghouse for commercial short-term letting not longer than 31 days for each period of occupation).

Simultaneously Welsh Government amended the Town and Country Planning (General Permitted Development) Order 1995 to allow permitted changes between the new use classes - C3, C5 and C6 or a mixture of those uses. These permitted changes can be withdrawn by way of a direction made under article 4 of the 1995 Order.

The Welsh Government also amended Planning Policy Wales to reflect the legislative changes. These policy changes make it explicit that, where relevant, the prevalence of second homes and short-term lets in a local area must be taken into account when considering housing requirements and policy approaches in Local Development Plans.

The permitted changes between the C3, C5 and C6 use classes, or a mix thereof, in the 1995 Order may also be removed by the Authority by way of planning conditions to restrict the use of a development to one particular use class within the Order, effectively preventing the ability to move between uses without planning permission.

Planning conditions are subject to a number of tests established in the Welsh Government circular WGC016/2014 'The Use of Planning Conditions for Development Management'¹ so any condition imposed would need to meet the tests, that conditions must be: (i) necessary; (ii) relevant to planning; (iii) relevant to the development to be permitted; (iv) enforceable; (v) precise; and (vi) reasonable in all other respects.

Officers have considered the appropriateness of applying conditions to control occupancy given the amendments to the Use Classes Order 1987 which provides for the three use classes.

The relevant policies from the Local Development Plan that apply are:

Policy 46 Housing (Strategy Policy):

When the Pembrokeshire Coast National Park Local Development Plan 2 was prepared it included a housing requirement figure which incorporated an allowance for second homes and holiday homes known as a 'vacancy rate'. Dwelling growth associated with the projected household growth is calculated using a dwelling 'vacancy rate' which takes account of the number of vacant or second properties in the National Park. Pembrokeshire Coast National Park has a high vacancy rate due to the number of second/holiday homes in the

¹ [Microsoft Word - Planning Conditions Circular - The Use of Planning Conditions for Development Management - Publication version without front cover 20141006.docx \(www.gov.wales\)](#)

area. The total housing requirement figure for the whole of the National Park area assumed that of those properties built during the LDP 2 period (until 2031) 26.7% of these would be used as either second homes or holiday homes. This figure was derived from census information on percentages in different communities at the base date of the evidence base for the Local Development Plan, so it was not a uniform figure for the whole area of the National Park. 26.7% is an average across the whole of the National Park.

A greater prevalence for second homes and short-term lets than anticipated in a specific location would be an issue for implementing the Local Development Plan's housing requirement under Policy 46 Housing (Strategy Policy) of the Local Development Plan as it could undermine anticipated delivery of (in particular) primary residences. Conversely, a lesser prevalence for second homes and holiday homes than anticipated would mean that the Local Development Plan's housing requirements under Policy 46 Housing (Strategy Policy) of the Local Development Plan were capable of being delivered and that holiday homes and second homes were less of an issue. This analysis, it is considered, could provide a rationale for justifying a need to impose a planning condition to restrict permitted changes between the new use classes on a case-by-case basis where a greater prevalence of second homes and holiday let than anticipated in the Local Development Plan's strategy is considered likely.

Policy 40 Self-catering Development:

Local Development Plan 2 also includes Policy 40 Self-catering Development which only permits self-catering development in specific locations (in a brownfield location in a Centre or in a conversion in a countryside location) but only in those instances where the site or building is inappropriate for market or affordable housing provision. Policy 40 is considered to provide strong justification for the imposition of a condition limiting use to C3 (Dwellings) and restricting permitted development rights to move to C5 (Second Homes) or C6 (Short-term lets) uses.

However, given that a vacancy rate allowance, as set out above under the Policy 46 Housing commentary, is already factored into the housing provision figures of the Local Development Plan 2, the Authority will be required to consider the prevalence of second homes and holiday lets in a locality in coming to such a decision as to the necessity of imposing a condition.

Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing:

Both these policies are supported by assumptions made to determine the viability of housing development to deliver the Authority's affordable housing targets. The viability was based on open market housing prices. If occupancy controls were imposed on housing, then this can impact on viability.

Although there is not yet specific evidence on the impact of restrictions in use in the National Park, evidence regarding the specific viability impact of the

imposition of a primary residence control is emerging in locations such as Cornwall, Dorset², the Scilly Isles³ and Exmoor National Park^{4 5}.

The documents referred to above advise that placing additional restrictions on new homes to exclude use for holiday letting may affect the market value of properties built as it limits the number of buyers by excluding all prospective second home and short-term letting owners.

The rule of thumb used is that 95% of open market value would be appropriate when a condition restricting second home or holiday letting use is used.

Any reduction in a development's viability would be likely to have negative implications for the Authority's affordable housing numbers which is a key strategic objective of Local Development Plan 2.

Taking each Policy listed above in turn, in light of the new Statutory Instruments and changes to Planning Policy Wales the planning application's compliance is considered.

The following matters are material:

- The application site is windfall site within the Tenby Centre Boundary. The affordable housing requirement for Tenby on windfall sites is 50%.
- The proposal is for 34 residential apartments with a mix of 23 x 1-bedroom apartments and 11 x 2-bedroom apartments.
- As a result of an independent viability assessment the offer of 5 affordable apartments has been agreed with the applicant (4 social rented properties and 1 LCHO property the specific terms of which have yet to be agreed)
- At the last Development Management Committee, it was requested that the appropriateness of imposing a principal resident occupancy condition be considered.

Policy 46 Housing (Strategy Policy):

The table below shows vacancy rate attributable to Tenby Town Council area from the 2011 Census.

² [9e6c81c7-b186-cad3-b5c9-99dab34d40f7 \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/9e6c81c7-b186-cad3-b5c9-99dab34d40f7) – Para 4.3 deals with viability issues.

³ <https://www.scilly.gov.uk/sites/default/files/planning-apps/Housing%20Viability%20Assessment%20Council%20of%20Isles%20of%20Scilly%20-%20Final%20Report%20March%202018.pdf> paragraph 2.12

⁴ https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0027/239715/Inspectors-Report-full.pdf paragraph 79.

⁵ https://www.exmoor-nationalpark.gov.uk/_data/assets/pdf_file/0025/222694/CE12-Three-Dragons-and-Rural-Housing-Solutions-2016-ENPA-Whole-Plan-Viability-Studya.pdf Paragraph 4.5

Community/City/ Town Council Areas:	All household spaces	Household Spaces with no usual resident:	Household Spaces with No usual resident (%)
Tenby	2982	732	24.55%

For Tenby Town Council area the apportioned second and holiday home allowance ('vacancy rate') made is an estimated 24.55 % of the provision could be used as second homes or holiday let.

However, analysis of Tenby records for properties within the Tenby Centre Boundary (development boundary delineated in the Pembrokeshire Coast National Park Local Development Plan 2) show that there is a higher prevalence rate of 28% of all residential properties in the Tenby Centre Boundary registered as holiday lets and second homes on the Council Tax register. The information is taken from the Local Land and Property Gazetteer (LLPG).⁶

Tenby
Total Properties: 3135
Residential Properties: 2255 (71.93%)
Total Holiday Lets and Second Homes: 880 (28.07%)
Holiday Lets: 435 (13.88%)
Second Homes: 445 (14.19%)

The higher prevalence in the centre as a whole (28%) above the LDP Housing Requirement allowance figure of 24.55% would indicate that there may be justification for applying a condition. However, as the LDP Housing Requirement specifically included an allowance which assumed that a proportion of properties across the National Park would be occupied as second homes or short-term holiday lets/homes there is a risk that applying a condition to 100% of the properties would cause displacement to other locations. Therefore, if a condition is imposed the Local Planning Authority may wish to apply the condition in line with the assumed percentage for that settlement. In the case of Tenby as there was an assumption that 24.5% (25% if rounded) of properties would be second homes or holiday homes, this would mean applying a condition to 75% of properties. Applying a condition to 75% of properties, rather than 100% of properties also assists with viability and affordable housing provision, as set out further below.

Clustering of Second and Holiday Homes:

However, it should also be considered whether higher prevalence can also be found in the area where the application site is located within the Centre Boundary?

⁶ A Local Land and Property Gazetteer (LLPG) is the central corporate database for all addressing used in an authority.

To assess this Officers have undertaken further analysis of the Local Land and Property Gazetteer (LLPG) to highlight where clusters of second homes and holiday lets can be found within the Centre Boundary of Tenby.

Method used⁷: Using computer algorithm similar data points are grouped together in a dataset. The assumptions inputted by Officers are to have a minimum of 5 such data points (in this case either second home or holiday let) within 100m of each other. DBSCAN finds the groups of points that are close together. It starts by choosing a point at random and then looks at all the other points within a certain distance of that point. If there are enough points within that distance, DBSCAN will consider those points part of a cluster. Then, it repeats the process for each of the points within the cluster until all the points in the cluster have been identified. DBSCAN also identifies points that are too far away from any cluster to be considered part of a group. These points are called "noise" points, and they're usually not useful for making predictions or analysing the data. Overall, DBSCAN is a useful algorithm for finding patterns in data when you don't know how many clusters there are or how big they are.

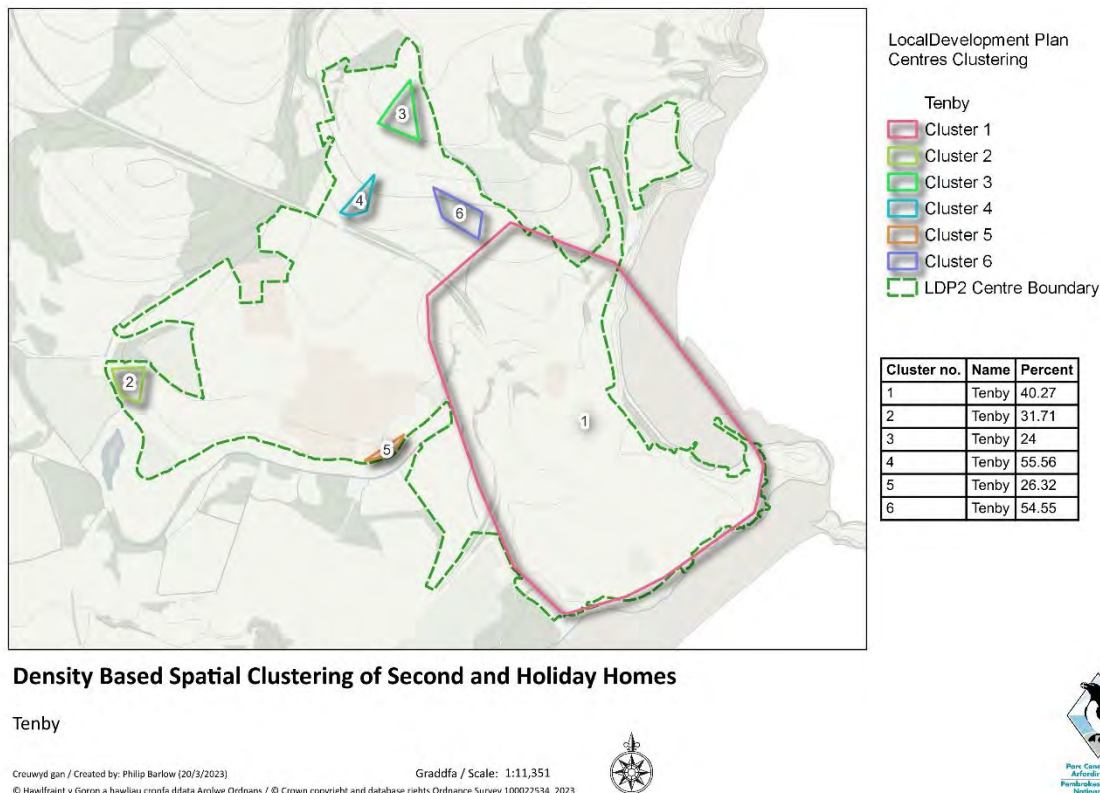
As a result of this analysis, it can be shown that holiday lets, and second homes are more prevalent in the clusters identified for Tenby than the vacancy rate assumption for the Town Council area as a whole.

CLUSTER_ID	Second and Holiday homes%	Application Site Located within
1	40.27%	✓
2	31.71%	
3	24.00%	
4	55.56%	
5	26.32%	
6	54.55%	

The map below identifies the location of these clusters. Detail has been removed from the mapping to ensure individual properties cannot be identified.

This mapping does not mean that there are no second homes or holiday let properties outside these clusters, it simply means that these clusters could be identified because there was a minimum of 5 second and/or holiday homes located each within 100m of another such property in the group.

⁷ DBSCAN stands for Density-Based Spatial Clustering of Applications with Noise



The application site lies within Cluster 1 where 40% of residential properties are in use as either a second or holiday home. This shows that when considered at a more local level the prevalence of holiday and second homes is greater than anticipated by Policy 46 Housing (Strategy Policy) for this location.

This means that the Local Planning Authority has evidence that both the Centre and the specific location considered have a greater prevalence of second homes and holiday homes than the allowance made for Tenby within the LDP 2 Housing Requirement.

At the levels shown, there could be justification for applying a C3 occupancy condition to 100% of market properties within the proposal, however this needs to be balanced against the risk of displacement and the potential impact on viability as identified above and considered further below.

Recent Housing Completions on large sites:

This section considers how recent housing developments of five or more dwellings that have been developed in Tenby have been occupied. The base date of Local Development Plan 2 (2015) is used as a starting point.

Since the base date of Local Development Plan 2 there have been 5 large sites (5 or more dwellings granted permission) that have had completions recorded.

Site 1 to 5	Total % Second Homes and Holiday Lets	Affordable Housing Scheme
Site 1	0	True
Site 2	68.42	False
Site 3	60	False
Site 4	85.75	False
Site 5	0	True

Of note (more detail not included for data protection reasons):

- The greater the amount of affordable housing development delivered on site the higher the percentage of primary residences recorded.
- Of the sites that were not 100% affordable housing (i.e., 2, 3 and 4) the total second homes and holiday lets recorded ranged from 60% to 85% of the total number of residential units completed.

As well as evidence from the Centre and the cluster mapping, analysis of recent completions shows that for large sites in Tenby, the prevalence of second homes and holiday lets in recent market completions ranges between 60% and 85%, again significantly above the 24.55% allowance included within the LDP 2 Housing Requirement for Tenby.

This evidence again demonstrates that there could be justification for applying a C3 occupancy condition to 100% of properties, however this needs to be balanced against the risk of displacement and the potential impact on viability as identified above and considered further below.

Similar Types of Proposals:

The type of proposal in question, a flatted development, has also been considered in terms of prevalence of holiday let and second homes in similar developments in Tenby. Ten properties in Tenby were identified which contained several flats, and the Local Land and Property Gazetteer was again checked for prevalence levels.

The location of the properties in Tenby is not shown for data protection reasons.

Location Number	Combined Percentage Second and Holiday Homes
1	77.63
2	68.42
3	85.71
4	87.50
5	42.86
6	87.50
7	100.00
8	90.00
9	0.00

Location Number	Combined Percentage Second and Holiday Homes	
10	80.77	
11	80.00	
	80.04	Average
	0.00	Min
	100.00	Max
	80.77	Median

Once again, the analysis of similar types of developments (in this case flats) demonstrates that the percentage of such property types in Tenby shows a greater prevalence for second and holiday home accommodation occupancy than anticipated by the LDP 2 Housing Requirement for Tenby. This also shows that there could be justification for applying a C3 occupancy condition to 100% of properties, however this needs to be balanced against the risk of displacement and the potential impact on viability as identified above and considered further below.

Policy 47 Housing Allocations or Land with Permission & Policy 48 Affordable Housing

Overall Housing Delivery:

For Tenby, no sites are formally allocated in the Plan. Table 10, page 129 of the Local Development Plan showing the expected Housing Land Supply for the Plan period (2015 to 2031) shows an anticipated 186 dwellings being completed which would be on average of 11 to 12 per annum. Seven years of the Plan have elapsed, and 100 residential units have been completed. This shows that when considered on an annual basis then the Local Development Plan requirement is being achieved.

Affordable Housing Delivery:

For affordable housing delivery a figure of 33 dwellings is identified for the Plan period. This low figure compared with County Council housing waiting lists reflects the fact that specific housing allocations with specific affordable housing requirements could not be identified for Tenby in the Local Development Plan process. Nevertheless, in terms of deliverability, windfall sites, in particular those that have been developed out by Registered Social Landlords for 100% affordable housing, have proven to be valuable contributions to affordable housing land supply in Tenby.

With seven years of the Plan elapsed 46 affordable dwellings have been completed. The target for Tenby has been achieved but nevertheless affordable housing need remains significant for the area.

Viability Revisited:

The independent consultant used to undertake the Viability Appraisal for the proposal has carried out a re-appraisal of the proposal based on 75% of the units being subject to a C3 restriction i.e. 7 units available on an unrestricted C3/C5/C6 basis at full open market value and a restriction on C5 and C6 use on 23 units at a 95% open market value. This appraisal indicates that the

proposal would support 4 affordable housing rented units (social rented) (three 1B apartments and one 2 bed apartment). The development is not able to support the low-cost home ownership unit offered with no occupancy restriction as well as the potential for a principal residency occupancy control.

Viability research shows that were 100% of the properties to have an occupancy condition attached, only 3 social rented properties could be supported by the development as an affordable housing contribution.

Conclusion on Occupancy Controls:

Taking account of the allowance that has been made for 24.55% of housing development in Tenby Town Council area to be taken up by holiday and second homes and the various measures against which the prevalence of holiday/second homes has been considered it is proposed that, if occupation controls are to be imposed, 75% of the open market dwellings (i.e., 23 flats) are subject to a C3 only and no C5 (second home) or C6 (short term lets) occupancy condition. This would allow for 7 flats to be sold at 100% open market price without any restriction on C5 or C6 use, 23 Flats subject to a C3 only restriction and no C5 and/or C6 use and 4 affordable housing social rented units. This represents an acceptable balance between the need for open market, holiday/second homes, and affordable housing requirements.

Officers have therefore assessed that the following three options are viable in the table below:

Options	Total Units on Site	Social Rented	LCHO	Open Market	C3 restricted Open Market
1	34	4	1	29	0
2	34	4	0	7	23
3	34	3	0	0	31

Conclusion

Option 1 was presented to committee at the March meeting and Option 2 is detailed above in the updated report. Based on the request by Members to consider the implications of such a restriction on C3 Use Class officers would recommend that if Members do wish to apply occupancy controls, Option 2 is viable and considered a preferred option which can be supported by Officers as a suitable alternative to the previous recommendation to address the C3 Use Class restrictions as requested by Members. Whilst it is considered that there is evidence that may support a condition on 100% of the market properties in question (Option 3 in the table above), officers consider that the risk of displacement to other locations and the lower level of affordable housing that this would make viable, mean that Option 2 (applying a condition

to 75% of the market properties) delivers the best overall scheme in terms of a mix of housing types to support Tenby's role as a Service and Tourism Centre.

Following consideration of the policies contained within the statutory Development Plan (Future Wales and Local Development Plan 2) and National Planning Policy in the form of Planning Policy Wales (Edition 11) and having regard to all material considerations it is considered that the development (Option 2) will be in accord with the Development Plan and the development is considered to provide a development which is acceptable in principle and can be supported by officers.

Recommendation

A further verbal report will be given to Members at the meeting on the highway safety issue and also the roof top terrace use limitations. Subject to these matters being suitably resolved officers would offer the following recommendation if members do wish to apply occupancy controls to C3 only and restrict C5 (second home) and C6 (short term lets) uses:

For the application to be delegated to the Chief Executive, Director of Placemaking, Decarbonisation and Engagement or to the Team Leader to issue consent upon receipt of a completed legal agreement to cover the affordable housing delivery, its retention in perpetuity and subject to the conditions set out below. If no completed legal agreement is received within 3 months officers would request that delegation is also given to allow refusal of the application due to a lack of mechanism of securing affordable housing in accordance with Policy 48 of LDP2.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive, and resilient communities.

Conditions

1. The development shall begin not later than five years from the date of this decision.

Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

2. The development shall be carried out in accordance with the following approved plans and documents:
 - Dwg Ref: 9720-RLL-XX-03-DR-A-S01103-Third Floor Plan GA (Received 10.09.2021)
 - Dwg Ref: 9720-RLL-XX-04-DR-A-S01104-Fourth Floor Plan GA (Received 10.09.2021)

- Dwg Ref: 9720-RLL-XX-RF-DR-A-S01105-Roof Plan GA (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01010-Street Elevation (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01106-Walmer House Boundary (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01110-Street Elevations as Proposed (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01001-Site_Location_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01002-Block_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01005-Site_Layout_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01100-Ground_Floor_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-01-DR-A-S01101-First_Floor_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01102-Second_Floor_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01111-Deer_Park_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01112-Warren_Street_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01113-Flank_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01114-Rear_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01115-Mews_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01116-Site_Section_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01301-Bat_and_Bird_Box_Location_Plan (Received 26.11.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01302-Native_Planting_Locations (Received 26.11.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01004-Topographic_Survey_Overlay_NP-21-0593 (Received 12.10.2021)
- Dwg Ref: 9720-RLL-XX-03-DR-A-S01103-Third_Floor_Plan_GA (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-04-DR-A-S01104-Fourth_Floor_Plan_GA (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-RF-DR-A-S01105-Roof_Plan_GA (Received 27.09.2021)
- 9720_Warren_Street_DAS_060721 pt1(2) (Received 10.09.2021)
- 9720_Warren_Street_DAS_060721 pt2(2) (Received 10.09.2021)
- 9720_Warren_Street_DAS_060721_pt3 (Received 27.10.2021)
- GKH137 Former Post Office Tenby Heritage Statement (Received 10.09.2021)
- Bat Survey Report 1 Warren Street Tenby for Trillium (RMF) Limited. Terraquua Ecological Services Ltd September 2020 (Received 10.09.2021)
- 784-A117020 210812 Transport Statement r3 (Received 10.09.2021)
- 784-A117020 Warren Street Tenby – Noise 09Feb21 (Received 10.09.2021)
- ArbTS_973.1_TenbyPostOffice_TreeReport (Received 10.09.2021)
- ArbTS_973.2_TenbyPostOffice_TreeReport (Received 09.12.2021)

- Dwg Ref: ArbTS_973.1_TenbyPostOffice_TreeConstraintsPlan (Received 27.09.2021)
- Dwg Ref: ArbTS_973.1_TenbyPostOffice_TreeDesignPlan (Received 10.09.2021)

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. The commercial unit hereby approved must control deliveries and collections and these shall not be carried out outside the hours of 07:00 to 19:00 Monday to Friday with no deliveries or collections on Saturdays, Sundays, and Bank Holidays.

Reason: To ensure that the amenity of neighbouring properties is preserved. Policy: Local Development Plan 2 – Policy 30 (Amenity).

4. Prior to the first use of the commercial premises as an A3 use an appropriate extraction system shall be installed into the premises and retained thereafter. The extraction system shall incorporate a carbon filter with an appropriate resistance, details of which shall be approved in writing by the local planning authority.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 - Policy 30 (Amenity).

5. Notwithstanding the fenestration details shown on the submitted drawings fenestration openings to mews gable at first and second floor level are to be no-opening with obscure glazing and maintained in perpetuity.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 - Policy 30 (Amenity).

6. Notwithstanding the submitted drawings detailing the roof top terrace, further information shall be submitted to the local planning authority for approval, in writing, prior to work commencing on site. The details shall include appropriate screening features to protect neighbour's amenity from this area. The approved details are to be constructed on site and maintained in perpetuity.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 - Policy 30 (Amenity).

7. Notwithstanding the details submitted on the drawings further details shall be submitted to the local planning authority, for approval, in writing, prior to work commencing on site. The details shall include the following:

- typical joinery details
- render
- slate
- retail windows

The approved details shall then be implemented within the scheme and maintained in perpetuity.

Reason: In order, to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

8. No development shall take place until a Construction Traffic Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. This shall include further information on the following:
- Parking for vehicles, site personnel, operatives, and visitors;
 - Loading and unloading of plant and materials;
 - Storage of plant and materials indicated on plans;
 - Vehicle routing and turning, including swept paths;
 - Measures to prevent the deposit of materials on the highway;
 - On-site turning for construction vehicles;
 - Consideration of the school and no movement/deliveries within the school pick-up/drop-off times

Following which, the construction will be expected to take place in accordance with the approved Construction Traffic Management Plan (CTMP).

Reason: To reduce the likelihood of obstruction of the highway, danger to road users, to conserve public health and local amenity, to ensure satisfactory standard of sustainable development and in order to ensure a proper standard of development and appearance in the interests of conserving the amenities and special qualities of the area. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park), 25 (Recycled, Secondary and Waste Materials), 29 (Sustainable Design), 30 (Amenity), 31 (Minimising Waste), 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

9. No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:
- Construction methods including details of materials, waste, and contaminated land.
 - General Site Management: construction programme, site clearance requirements, construction drainage, site set-up plan detailing sensitive receptors and buffer zones, relevant protection measures e.g. fencing, etc.
 - CEMP masterplan: detailing the development, location of landscape and environmental resources, design proposals and objectives for integration and mitigation.
 - Control of Nuisances: restrictions on timing / duration / frequency of works, e.g. noise / vibration from piling activities, acoustic barriers, dust control measures, control of light spill and conservation of dark skies.
 - Resource Management: fuel and chemical storage, waste management, water consumption, energy consumption.

- Pollution Prevention: demonstrate compliance with relevant Guidelines for Pollution Prevention, incident response plan, site drainage plan.
- Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.
- Details of the persons/bodies responsible for particular activities associated with the CEMP and emergency contact details.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Reason: To ensure necessary management measures are agreed prior to commencement of development or phase of development and implemented for the protection of the environment during construction.

Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (Sites and Species of European Importance), 11 (Nationally Protected Sites and Species), 14 (Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

- 10.** Before development commences details of the pedestrian visibility splays shall be submitted to the Local Planning Authority for approval. The dwelling(s)/building(s) shall not be occupied, nor the use commenced until the junction has been constructed and is available for use in accordance with the approved plans.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 11.** Notwithstanding the submitted drawings the off-street parking facilities (for all vehicles, including cycles) shown on the plan reference: 9720-RLL-XX-00-DR-A-S01005/RevA shall include 1 disabled parking space and a revised layout plan shall be submitted to the local Planning Authority for approval in writing. The agreed parking and cycle storage must then be provided before the building is first occupied, and thereafter retained for that purpose.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 12.** Before any housing construction work is commenced the access, parking and turning area must be constructed up to and including road base level and be suitably drained for the use of construction traffic and approved visibility splays constructed.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 13.** All surface water shall be trapped and disposed of so as not to flow onto any part of the public highway.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

14. The proposed development shall be completed in full adherence to the arboricultural details contained in ArbTS_973.2_Former Post/Delivery Office Arboricultural Report 9th December 2021 submitted to this authority. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed, in writing, by the Local Planning Authority. Upon completion of the development, this authority will be provided with clear and obvious proof that the details of the Arboricultural Method Statement have been adhered to. Proof will be demonstrated through the submission of written confirmation from the Arboricultural Consultant which summarise the details of each visit, including where relevant photographic evidence of adherence to the Arboricultural Method Statement and Tree Protection Plan.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation, and enhancement of links between sites and their protection for amenity, landscape, and biodiversity value. Policy: Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), Technical Advice Notes - (TAN) 5: Nature Conservation and Planning (2009) and (TAN) 10: Tree Preservation Orders (1997).

15. Development shall not begin until an appropriate photographic survey of the existing building(s) has been carried out in accordance with guidelines provided by the Local Planning Authority's archaeological advisors - Dyfed Archaeological Trust- Heritage Management. The resulting photographs should be approved by the Local Planning Authority prior to the commencement of development and deposited by the Local Planning Authority with the regional Historic Environment Record, held and maintained by the Dyfed Archaeological Trust.

Reason: To protect historic environment interests whilst enabling development. Policy: Local Development Plan 2 - Policy 8 (Special Qualities) and Planning Policy Wales (Edition 11).

16. No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface, and land water, and include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan 2 – Policy 29 (Sustainable Design).

17. No development shall take place until a plan(s) has been submitted to the local planning authority and approved, in writing, identifying the 23 units of accommodation which shall be used for Use Class C3 only, and for no other purpose (including any other purpose in class C5 or C6 or a mix of C3, C5 and/or C6 uses) and the units so identified on the approved plan shall be used for Use Class C3 only, and for no other purpose (including any other purpose in class C5 or C6 or a mix of C3, C5 and/or C6 uses) notwithstanding Part 1 Class I of the schedule to the Town and Country Planning (Use Classes) Order 1987 as amended (or in any provision equivalent to that class in any statutory instrument revoking and re-enacting that order with or without modification).

Reason: This permission has been granted having regard to the special circumstances of the case and use not in accordance with the requirements of the condition would require the further consideration of the Local Planning Authority in the light of the Local Development Plan 2 and any other material considerations. Policy: Local Development Plan 2 – Policy 7 (Countryside) Policy 30 (Amenity), Policy 40 (Self-catering Development) and Policy 52 (Housing Mix).

Informatives

The applicant's attention is drawn to the attached Dyfed Archaeological Trust consultation response.

The applicant's attention is drawn to the attached Natural Resources Wales consultation response.

The applicant's attention is drawn to the attached Welsh Water Informative

The applicant's attention is drawn to the attached PCC Drainage Engineers consultation response.

Fire Authority:

The developer should consider the need to provide adequate water supplies for fire fighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following link:

<https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

Ecology:

It is recommended that the applicant be informed that all British bat species are European Protected Species by virtue of their listing under Annex IV of

EC Directive 92/43/EEC ('The Habitats Directive'). This Directive has been transposed into British Law under the Conservation of Habitats and Species Regulations 2017. British bats are also protected under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended).

It is recommended that the applicant and contractors be informed of the possibility of encountering bats unexpectedly during works.

If bats are encountered on site works should stop immediately and NRW should be contacted (Natural Resources Wales, - General Enquiries: enquiries@naturalresourceswales.gov.uk or 0300 065 3000 Mon-Fri, 8am - 6pm) a licence may then need to be applied for from NRW. Licences are not automatically granted by virtue of a valid planning consent, and it may be possible that the necessary licence application may be refused.

Appendix A

Ref No: NP/21/0593/FUL
Proposal: Demolition of existing building & construction of 34 residential units incorporating class A1/A2/A3 and D2 floorspace at ground level & all associated development
Site Location: Former Royal Mail Delivery Office, Warren Street, Tenby, Pembrokeshire, SA70 7JR

The application was reported to the March Development Management Committee and was deferred to the April Committee for further information to be provided on affordable housing to Members.

Consultee Response

Tenby Town Council: Refusal due to lack of affordable housing provision, massing of the site due to its proximity to the Conservation Area, two listed Churches and the Scheduled Ancient Monument Town Walls and inadequate parking provision

Tenby Civic Society: Concerns raised on lack of affordable housing, design, scale, visual impact on surrounding sites and control on commercial unit

Tenby Chamber of Trade and Tourism: No response received

Mid and West Wales Fire & Rescue Service: Informative note to be added to any consent

Welsh Water: Conditional consent and informative note

Natural Resources Wales: No objection

Cadw: No objection raised

PCNPA Ecologist: Conditional consent

PCNPA Tree and Landscape officer: Conditional consent

PCNPA Buildings Conservation officer: Conditional consent

PCC Access officer: Informative note to be added to any consent

PCC Education Department: No contribution required

PCC Drainage Engineers: SAB approval required

PCC Transportation and Environment: Conditional consent

PCC Public Protection: Conditional consent

Dyfed Archaeological Trust: Conditional consent

Public Response

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and County Planning (Development Management Procedure) (Wales) Order 2012.

Six letters of objection have been received and their concerns relate to the following:

- Over-development of the site
- Lack of affordable housing
- Lack of parking provision

- Access to the site and highway safety
- Lack of viable retail element
- Potential dust and noise nuisance during construction works on nearby neighbours and religious sites
- Excessive height to the mews building creating amenity issues to neighbours
- Excessive height to the main development and out of character
- Impact on existing biodiversity habitats within and adjacent to the site
- Impact on existing stone boundary wall to neighbour's garden
- Loss of privacy from proposed fenestration and roof top terrace
- Lack of communication with developers
- Demolition of existing boundary wall will impact on existing attached ancillary structures within neighbour's gardens
- Potential for the development to incorporate flue vents on the rear wall of the mews building impact on neighbour's amenity
- Capacity of local sewage network

The report below addresses the material considerations raised above.

Policies Considered

Pembrokeshire Coast National Park Local Development Plan (LDP2)

Please note that these policies can be viewed on the Policies page of Pembrokeshire Coast National Park website –

LDP2 Policy 01 - National Park Purposes and Duty
 LDP2 Policy 02 – Tenby Service and Tourism Centre
 LDP2 Policy 08 - Special Qualities
 LDP2 Policy 10 – Sites and Species of European Importance
 LDP2 Policy 11 – Nationally Protected Sites and Species
 LDP2 Policy 14 – Conservation of Pembrokeshire Coast National Park
 LDP2 Policy 29 - Sustainable Design
 LDP2 Policy 30 - Amenity
 LDP2 Policy 31 - Minimising Waste
 LDP2 Policy 32 – Surface Water Drainage
 LDP2 Policy 44 – Protection of Employment Sites and Buildings
 LDP2 Policy 46 – Housing
 LDP2 Policy 48 – Affordable Housing
 LDP2 Policy 50 – Housing Development Proposals
 LDP2 Policy 51 – Housing Densities
 LDP2 Policy 52 – Housing Mix
 LDP2 Policy 56 – Retail in the National Park
 LDP2 Policy 57 – Town and District Shopping Centres
 LDP2 Policy 59 – Sustainable Transport
 LDP2 Policy 60 - Impacts of Traffic

Future Wales, The National Plan 2040 (Future Wales), published by Welsh Government on 24 February 2021

Planning Policy Wales 11

SPG01 – Affordable Housing
SPG03 - Landscape Character
SPG05 – Planning Obligations
SPG10 - Archaeology
SPG12 - Biodiversity
SPG13 – Parking Standards
SPG16 - Sustainable Design & Development

TAN02 – Planning and Affordable Housing
TAN04 – Retailing and Commercial Development
TAN05 – Nature Conservation and Planning
TAN06 – Planning for Sustainable Rural Communities
TAN10 – Tree Preservation Orders
TAN11 - Noise
TAN12 – Design
TAN15 – Development and Flood Risk
TAN18 - Transport
TAN24 – The Historic Environment

Officer's Appraisal:

Background and History

The existing site currently lies vacant and was previously used as a Royal Mail general sorting office and a small convenience store along with a separate café unit. The site had vehicular access both from Warren Street and Deer Park but operated a one-way system for vehicles using the site. A TPO tree is also currently located on the boundary to the host site and also located on the corner of Warren Street and Deer Park.

The proposed demolition of the existing structures on site also requires conservation area consent and this is currently being considered separately under planning reference: NP/21/0594/CAC.

The following has been identified as recent planning history for the site:

- NP/03/007/S – Proposed shop/projecting sign – Approved 28.05.2003
- NP/06/315 – Provision of disabled access for customers – Approved 04.08.2006
- NP/17/0022/FUL - Change of use from B1 (offices) to A3 (cafe) – Approved 24.03.2017
- NP/17/0383/ADV - Signage (Retrospective) – Approved 18.09.2017

Current Proposal

The application seeks consent for the demolition of the existing structures within the site and the construction of two new buildings to accommodate 34

residential units incorporating class A1/A2/A3 and D2 uses within the floorspace at ground level & all associated development.

Key Issues

The application raises the following planning matters: -

- Policy, Principle of Development, and Impact on National Park
- Affordable Housing
- Impact on Scheduled Monuments
- Impact on Listed Buildings
- Impact on the Conservation Area
- Siting and Sustainable Design
- Amenity and Privacy
- Access and Parking
- Landscaping
- Biodiversity
- Land Drainage
- Other Material Considerations

Policy, Principle of Development, and Impact on National Park:

Future Wales – The National Plan 2040 (FW which was adopted on 24th February 2022 and is the National Development Framework for Wales – is the national tier of the Development Plan. Policy 4 Supporting Rural Communities states that Strategic and Local Development Plans must identify their rural communities, assess their needs, and set out policies to support them. On page 104, Future Wales states that: National Park Authorities “*are unique planning entities with a specific remit to reflect the distinctive characteristics of their areas... and that Future Wales policies respect the functions of National Parks in terms of their statutory purposes...*”

The application site is located within the Centre Boundary, the Retail Centre and the Conservation area of Tenby as defined by Local Development Plan 2. Policy 2 of the Plan sets out the land use priorities for Tenby Service and Tourism Centre and include a) to provide for and or permit housing to facilitate the delivery of the affordable housing needs of the local area; b) to permit proposals for small scale employment development; c) to protect and enhance the town’s facilities and shopping centre which serve the needs of the local area and visitors and e) to ensure developments permitted contribute to the protection and enhancement of the town’s special qualities.

The proposal is for the demolition of the existing Royal Mail Delivery Office and for the construction of 34 no residential units comprised of 23 no. 1 bed units and 11 no. 2 bed units. 5 units of affordable housing (as set out further below) are proposed. Commercial use comprising A1/A2/A3 and D2 use is proposed for the ground floor. The proposal is therefore in accordance with Policy 2.

The application follows pre-application discussions with this Authority and as such is a revised scheme to address pre-application issues with the design,

parking, Tree Protection Orders and the impact on the Conservation Area, Listed Buildings and Scheduled Ancient Monument.

Correspondence has been received raising concerns on the lack of a viable retail element at this location.

The current use of the site is for employment use. However, the site has been vacant for a number of years and has been marketed since February 2019 with no interest in the site for employment purposes. It is considered that this period is compliant with the requirements of Policy 44, which states that the feasibility of retaining existing uses should include offering the site or premises for sale on the open market for at least one year at a realistic price. Policy 44 states that where the loss of an employment site is justified a community use or market / affordable housing will be given priority. Policy 44 is considered to be complied with.

The site is within the Retail Centre for Tenby and proposes 116 m2 net A1 floorspace. Policy 56 sets out a requirement for 707m2 (net) floorspace in Tenby through the re-use of buildings. Proposals for retail development should not have an unacceptable adverse impact on the character or appearance of the Centre. New retail development should also be of a scale and design appropriate to the Centre and must not undermine the retail hierarchy. Policy 57 states the uses that are acceptable within the town shopping centre of Tenby. Whilst C3 use is generally precluded in the retail area, paragraph 4.314 considers that residential development above ground level is appropriate. This proposal is therefore considered to comply with Policy 57. The proposal for redevelopment of the vacant employment site to mixed residential and commercial use is acceptable in principle.

Affordable Housing:

Correspondence has been received raising concerns on the lack of affordable housing within the development.

Policy 55 states that the Authority will seek to obtain benefits to contribute to dealing with the most acute areas of need for National Park communities. This will include consideration of affordable housing; recreational and amenity open space; sustainable transport facilities; educational facilities; community facilities (including libraries); public art; and biodiversity. Where it can be proven that a proposal is unable to deliver (i.e. the proposal would not be financially viable) in terms of the policy requirements of the Plan (i.e. for affordable housing provision, sustainable design standards expected and community infrastructure provision) priority will be given to the delivery of affordable housing in any further negotiations, provided that it can be demonstrated that the proposal would not unduly overburden existing community infrastructure provision.

The provision of affordable housing is a main priority of Local Development Plan 2. Policy 48 of the Plan requires on-site provision of 50% of affordable housing on sites of 2 or more dwellings in Tenby, subject to viability.

A detailed viability assessment in line with the Affordable Housing SPG has been submitted and independently assessed and verified. The conclusion of the assessment indicated that there was limited viability on this site and that five units would be the limit that could be provided without the development becoming unviable. The authority has indicated that of the five units indicated above four units will need to be Social Rented controlled by a registered social landlord and one unit will be Low-Cost Home Ownership (LCHO) secured in perpetuity via a legal agreement which will meet the requirements as set out under Policies 2 and 48. The make-up of the five units will be as follows:

Plot 5 - 1 bed (2 person) – Social Rented
Plot 6 - 2 bed (4 person) – Social Rented
Plot 14 - 1 bed (2 person) – Social Rented
Plot 15 - 2 bed (2 person) – Social Rented
Plot 23 - 1 bed (2 person) – LCHO

A legal agreement to secure the affordable housing has been requested but not received to date and will be addressed within the recommendation below.

Impact on Scheduled Monuments:

The development site is located opposite the scheduled ancient monument - Tenby Town Walls (PE007). Cadw has indicated that the application is accompanied by a historic setting assessment produced by GK Heritage Consultants. This work has considered the setting of the town wall and how the current Post Office buildings has an adverse impact on it. In the opinion of the report's author, the demolition of the existing low level late 20th century industrial utilitarianism style building and its replacement with a much taller building, in a 19th century style reminiscent of buildings on High Street but not in the South Parade area would have a positive effect on the setting of the Town Walls.

Cadw disagree with this conclusion and consider that the removal of Post Office buildings will improve the setting of the town walls, but the proposed bulk of the proposed building will overshadow the town walls and its height will block views from them, which are currently open above the existing building, and these changes will have an adverse effect.

However, they note that the proposed building has been designed so that it does not block existing views to the town wall and whilst there will be a few viewpoints where the proposed building and the town wall will be seen together, in these views the proposed building is set back from the town walls.

As such, Cadw consider that the proposed building will slightly increase the impact of modern buildings on the setting of scheduled monument PE007 compared to the present situation. However, this change will not be significant and therefore no objections are raised on the current proposal.

Impact on Listed Buildings:

Section 66 of the Planning Listed Buildings and Conservation Areas Act 1990 requires that in considering whether to grant planning permission for development which affects a listed building or its setting, the authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

The proposed traditional design acknowledges the setting of both listed chapels and Walmer House, the painted render forming an appropriate visual counter to the masonry of these buildings and indeed the town walls. In terms of massing, the main portion is of four storeys plus attic – not totally alien in that the nearby Deer Park has a 3 storey plus attic terrace set on a high basement – with the storeys of taller Victorian proportions.

The setting back of the Deer Park elevation in favor of the mature alder (TPO) is welcomed in allowing St John's church to retain its corner landmark status, a deliberate Nonconformist eye-catcher on one of the main historic entrances to the town centre.

The proposed scale also ensures that the relative heights of both chapels are respected, the proposed ridge-height exceeding neither (although an elevational panorama of the whole group is not possible on the ground). As such, it is considered that the setting of listed buildings within the proximity of the site is maintained.

Impact on the Conservation Area:

Section 72 of the Planning Listed Buildings and Conservation Areas Act 1990 requires that the authority pays special attention to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

The loss of the post office complex (built c. 1958, in part replacing a 3-storey late C19 house and some cottages) is considered acceptable. Whilst of their time, the buildings are utilitarian and are not particularly distinguished in terms of architecture or grouping. In terms of the proposed development, the traditional approach adopted is a response to pre-application discussions, to recent developments along Warren Street and to the surrounding streetscape.

The design captures the Victorian character of the town well and responds both to the topography and adjacent listed buildings in terms of stepped heights. A high level of detail will be required under appropriate conditions of typical joinery details, render, slate, retail windows etc. As stated above, the main block is of four storeys with attic, but the ridge does not exceed that of the chapels either side, the latter remaining pre-eminent in the streetscape, as their architects and congregations intended. As such, it is considered that the character and appearance of the conservation area is retained.

Siting and Sustainable Design:

Correspondence has been received raising concerns on over-development of the site, excessive height to the mews building creating amenity issues to neighbours, excessive height to the main development and out of character and massing of the site due to its proximity to the Conservation Area, two listed Churches and the Scheduled Ancient Monument Town Walls.

Policy 29 of the LDP2 requires all development proposals to demonstrate an integrated approach to design and construction and be required to be well designed in terms of place and local distinctiveness (criterion 'a').

The removal of the existing buildings and the proposed new structures are considered to provide an overall improvement to the appearance within this urban location. The proposed siting of the works within this location are considered acceptable as the proposal has a scale, form, mass, and design which is in-keeping within this area of Tenby. Officers have worked with the development team at pre-application stage to ensure that the overall design and prominent street frontages are respectful to the site and its sensitive surrounding buildings and structures as mentioned above.

The proposal will retain a commercial element and provide new residential accommodation which incorporates sustainable design principles and is therefore considered to be in accordance with LDP2 Policy 29.

Amenity and Privacy:

Correspondence has been received raising concerns on potential dust and noise nuisance during construction works on nearby neighbours and religious sites, impact on existing stone boundary wall to neighbour's garden, loss of privacy from proposed fenestration and roof top terrace, demolition of existing boundary wall will impact on existing attached ancillary structures within neighbour's gardens and potential for the development to incorporate flue vents on the rear wall of the mews building impact on neighbour's amenity.

Policy 30 of the LDP refers to 'amenity' in general seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties particularly where the development is an inappropriate use, is of a scale incompatible with its surroundings, development leads to an increase in traffic, noise, odour or light or the development is visually intrusive.

PCC Public Protection has indicated that a condition relating to deliveries and collections for the commercial aspect of the development would be appropriate to ensure no deliveries and collections before 0700 and after 1900 hours Monday to Saturday and no deliveries and collections on Sunday or bank holidays.

The application site is surrounded by a mix of residential properties and existing commercial businesses. The concerns raised in respect of dust and noise during construction works be addressed via a condition to ensure that a

Construction Environmental Management Plan is submitted and agreed prior to any works being commenced on the site.

The potential for the development to have an adverse impact on the existing stone walls and other ancillary structures within adjacent gardens will be covered under the Party Wall Act under which the developers must contact directly with the neighbours to agree a course of action. It is not a material planning consideration. The development indicates that the existing buildings will be demolished to heights as indicated on the submitted plans and these remaining walls will be retained as boundary features.

In respect of the potential for the development to incorporate flue vents on the rear wall of the mews building impacting on neighbour's amenity, this will be controlled by separate legislation with building regulations.

The concern raised on excessive height to the mews building creating amenity issues to neighbours is not supported by officers as the scale of the development is considered acceptable. However, the new fenestration on this gable elevation could potentially overlook the neighbours garden at first and second floor levels so it is suggested that a condition be imposed to control these fenestration openings to be no-opening with obscure glazing and maintained in perpetuity.

The proposed roof top terrace is also a feature which has raised concerns on its potential to overlook neighbour's gardens. Given the height, location, orientation, and the fact that the neighbours garden is also set at a lower level to the host site there may be some impact from this feature. It is considered that the level of guarding required for safety will restrict people getting close to the edge of the roof terrace and therefore the relevant overlooking angles from the accessible terrace will be reduced. However, given that the scope for overlooking from this element remains and this will impact neighbour's privacy and amenity, a condition will be imposed to agree details of terrace screening which will prevent any overlooking from this terrace and these details will be agreed prior to any commencement of works.

Given the nature of the current proposal, its location and the additional measures detailed above, it is considered that the privacy and amenity of any nearby neighbours will be protected in this instance.

Access and Parking:

Correspondence has been received raising concerns on lack of parking provision, access to the site and highway safety.

Pembrokeshire County Council highways officer has indicated that the site is located on the corner of Warren Street an unclassified road and the A4139 known as Deer Park, the A4139 is one of the main arterial roads leading into Tenby Town Centre, Warren Street is a busy road, made up of commercial and residential property.

The Highway has double yellow lines running the full length of the northern side of the street, with restrictive bays of 30 mins, disabled, and resident permit holder only bays aligning most of the southern side of the street.

The site is within easy walking distance of multiple local public carparks, including the multi-storey car park, which is 230m walk, the railway station is 250m away and the Bus Stops are between 180m-230m distance, the site is also within a short walk of local amenities, and the cycle network.

The submitted plans show that the existing access off the A4139 will be utilised, the design and access statement states that the visibility splay of 2.4m x 25m can be achieved to the east, in accordance with Manual for Streets for a 20mph zone. The access is currently 30m outside of the 20mph zone however, with the forthcoming national speed reduction scheme of default 20's and the time required to develop the site, the authority can accept the visibility splays for 20mph as Deer Park will default to a 20mph road in September 2023.

The visibility to the west can only achieve 2.0m x 16.7m which is below the standard requirement. However, it is an existing access which is not showing any historic issues or accidents within the past 5 years. Whilst it is accepted that no improvements can be made to the visibility splay to the west of the access, it is important that pedestrian visibility is maximised, therefore a condition requiring further details of how the pedestrian visibility will be improved will be added to any consent. The access is approximately 4.3m wide, the DAS and submitted drawings give no indication that the access width will be amended this will also need to be covered by the condition highlighted above.

The bin storage off Warren Street is noted therefore refuse lorries can collect from the highway, the access is suitable for emergency vehicles to enter and exit.

This site is situated outside of the walled town of Tenby, but it is within Zone 1 of the PCNP SPG parking standards, therefore, this site is not required to provide parking for the development. However, the indicative plans show that the development will provide 10 parking spaces with an EV charging space located in one of the bays. There are no disabled parking bays within the plans, which should be 6% or a minimum of 1, so this will be conditioned as part of any consent to secure the disabled parking space.

The frontage to Warren Street incorporates pedestrian doorways into the replacement commercial unit(s), access to bin collection for both the residential and the commercial, and the shared use pathway through to the car park and the 22 covered cycle stands. A further principle "front door" into the block of flats is well placed close to the Warren Street junction so overall there should not be a need for pedestrians to walk through on the vehicle access.

The proposed replacement commercial/retail space does not pose a problem as located on the plans. The most likely impact of the proposed development will be keenly felt in the area during construction, as such, a Construction Traffic Management Plan will be required to be submitted and agreed prior to the commencement of works.

Based on the above aspects the development will accord with LDP2.

Landscaping:

Retained trees, hedgebanks and hedges on and immediately adjacent to the proposed development site are at risk of physical damage above ground through contact with plant machinery, chemical damage to root zones through use of concrete and other contaminants in proximity to trees, mechanical damage below ground through compaction of root zone by machinery and equipment, as well as risk of root damage during any excavations. The application is supported by an arboricultural report which addresses these matters. A condition will be added to any consent granted to ensure that the proposed development is completed in full adherence to the arboricultural details.

Biodiversity:

Correspondence has been received raising concerns on impact on existing biodiversity habitats within and adjacent to the site.

Natural Resources Wales has indicated that the bat report submitted in support of the application (Bat Survey Report Prepared by TerraAqua, September 2020) has identified that bats were not using the application site and therefore have no comments to make on the application as submitted.

The Authority's Ecologist confirms there are no potential roost features within the existing building proposed for demolition given the information submitted in support of the application. A biodiversity enhancement scheme has been submitted and will be a condition of any consent. This will ensure that enhancements are integrated into the scheme, and it is designed appropriately.

Due to the town centre location of the development, there is likely already a significant amount of external lighting. It is however important that any external lighting does not deter wildlife from using any enhancement features provided and so an external lighting scheme should be submitted to and approved by the LPA prior to installation. Both above aspects will be conditioned to remain in perpetuity.

Based on the information provided it is considered that an EPS license is not required in this instance and there is a reasonable likelihood that bats will not be affected by the development. The application site is also approximately 150m from the Carmarthen Bay and Estuaries Special Area of Conservation (SAC). As a competent authority under the Habitats Regulations, there is a need to consider the impacts of development on the features for which the European site is designated. However, on the basis of information received

from the PCNPA Ecologist it is considered that this development proposal will not have a likely significant effect on the SAC features and habitats Regulation Assessment is therefore not required.

Land Drainage:

Correspondence has been received raising concerns on capacity of local sewage network.

Welsh Water has indicated that a drainage scheme for the disposal of foul, surface and land water should be required through a condition prior to any development commencing.

PCC Drainage Engineers support the application subject to the discharge of surface water being directed to a new sustainable drainage system. SAB approval is required in this instance as the proposal creates hard surface area in excess of 100 square metres, and an informative will be added to any consent to inform the applicant of this requirement.

Other Material Considerations:

Dyfed Archaeological Trust has indicated that a condition should be included within any consent to ensure a written scheme of investigation is submitted prior to development to and approved by this authority.

Conclusion

Following consideration of the policies contained within the statutory Development Plan (Future Wales and Local Development Plan 2) and National Planning Policy in the form of Planning Policy Wales (Edition 11) and having regard to all material considerations it is considered that the development will be in accord with the Development Plan and the development is considered to provide a development which is acceptable in principle and can be supported by officers.

Recommendation

For the application to be delegated to the Chief Executive, Director of Planning or to the Team Leader to issue consent upon receipt of a completed legal agreement to cover the affordable housing delivery, its retention in perpetuity and subject to the conditions set out below. If no completed legal agreement is received within 3 months officers would request that delegation is also given to allow refusal of the application due to a lack of mechanism of securing affordable housing in accordance with Policy 48 of LDP2.

In reaching a recommendation, regard has been given to the requirements of sections 3 and 5 of the Well Being of Future Generations (Wales) Act 2015. It is considered that this recommendation is in accordance with the Act's sustainable development principle through its contribution towards the Welsh Ministers' well-being objective of supporting safe, cohesive, and resilient communities.

Conditions

1. The development shall begin not later than five years from the date of this decision.

Reason: Required to be imposed pursuant to Section 91 (1) of the Town and Country Planning Act 1990 (as amended).

2. The development shall be carried out in accordance with the following approved plans and documents:

- Dwg Ref: 9720-RLL-XX-03-DR-A-S01103-Third Floor Plan GA (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-04-DR-A-S01104-Fourth Floor Plan GA (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-RF-DR-A-S01105-Roof Plan GA (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01010-Street Elevation (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01106-Walmer House Boundary (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01110-Street Elevations as Proposed (Received 10.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01001-Site_Location_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01002-Block_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01005-Site_Layout_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01100-Ground_Floor_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-01-DR-A-S01101-First_Floor_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-00-DR-A-S01102-Second_Floor_Plan (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01111-Deer_Park_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01112-Warren_Street_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01113-Flank_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01114-Rear_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01115-Mews_Elevation_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01116-Site_Section_as_Proposed (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01301-Bat_and_Bird_Box_Location_Plan (Received 26.11.2021)
- Dwg Ref: 9720-RLL-XX-ZZ-DR-A-S01302-Native_Planting_Locations (Received 26.11.2021)

- Dwg Ref: 9720-RLL-XX-00-DR-A-S01004-Topographic_Survey_Overlay_NP-21-0593 (Received 12.10.2021)
- Dwg Ref: 9720-RLL-XX-03-DR-A-S01103-Third_Floor_Plan_GA (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-04-DR-A-S01104-Fourth_Floor_Plan_GA (Received 27.09.2021)
- Dwg Ref: 9720-RLL-XX-RF-DR-A-S01105-Roof_Plan_GA (Received 27.09.2021)
- 9720_Warren_Street_DAS_060721 pt1(2) (Received 10.09.2021)
- 9720_Warren_Street_DAS_060721 pt2(2) (Received 10.09.2021)
- 9720_Warren_Street_DAS_060721_pt3 (Received 27.10.2021)
- GKH137 Former Post Office Tenby Heritage Statement (Received 10.09.2021)
- Bat Survey Report 1 Warren Street Tenby for Trillium (RMF) Limited. Terraqua Ecological Services Ltd September 2020 (Received 10.09.2021)
- 784-A117020 210812 Transport Statement r3 (Received 10.09.2021)
- 784-A117020 Warren Street Tenby – Noise 09Feb21 (Received 10.09.2021)
- ArbTS_973.1_TenbyPostOffice_TreeReport (Received 10.09.2021)
- ArbTS_973.2_TenbyPostOffice_TreeReport (Received 09.12.2021)
- Dwg Ref: ArbTS_973.1_TenbyPostOffice_TreeConstraintsPlan (Received 27.09.2021)
- Dwg Ref: ArbTS_973.1_TenbyPostOffice_TreeDesignPlan (Received 10.09.2021)

Reason: In order to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

3. The commercial unit hereby approved must control deliveries and collections and these shall not be carried out outside the hours of 07:00 to 19:00 Monday to Friday with no deliveries or collections on Saturdays, Sundays, and Bank Holidays.

Reason: To ensure that the amenity of neighbouring properties is preserved. Policy: Local Development Plan 2 – Policy 30 (Amenity).

4. Prior to the first use of the commercial premises as an A3 use an appropriate extraction system shall be installed into the premises and retained thereafter. The extraction system shall incorporate a carbon

filter with an appropriate resistance, details of which shall be approved in writing by the local planning authority.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 - Policy 30 (Amenity).

5. Notwithstanding the fenestration details shown on the submitted drawings fenestration openings to mews gable at first and second floor level are to be no-opening with obscure glazing and maintained in perpetuity.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 - Policy 30 (Amenity).

6. Notwithstanding the submitted drawings detailing the roof top terrace, further information shall be submitted to the local planning authority for approval, in writing, prior to work commencing on site. The details shall include appropriate screening features to protect neighbour's amenity from this area. The approved details are to be constructed on site and maintained in perpetuity.

Reason: To protect the amenities of the occupiers of nearby dwelling houses. Policy: Local Development Plan 2 - Policy 30 (Amenity).

7. Notwithstanding the details submitted on the drawings further details shall be submitted to the local planning authority, for approval, in writing, prior to work commencing on site. The details shall include the following:

- typical joinery details
- render
- slate
- retail windows

The approved details shall then be implemented within the scheme and maintained in perpetuity.

Reason: In order, to be clear on the approved scheme of development in the interests of protecting visual amenity and the special qualities of the National Park. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park) and 29 (Sustainable Design).

8. No development shall take place until a Construction Traffic Management Plan has been submitted to, and approved in writing by, the Local Planning Authority. This shall include further information on the following:
- a) Parking for vehicles, site personnel, operatives, and visitors
 - b) Loading and unloading of plant and materials
 - c) Storage of plant and materials indicated on plans
 - d) Vehicle routing and turning, including swept paths
 - e) Measures to prevent the deposit of materials on the highway
 - f) On-site turning for construction vehicles
 - g) Consideration of the school and no movement/deliveries within the school pick-

up/drop-off times

following which, the construction will be expected to take place in accordance with the approved Construction Traffic Management Plan (CTMP).

Reason: To reduce the likelihood of obstruction of the highway, danger to road users, to conserve public health and local amenity, to ensure satisfactory standard of sustainable development and in order to ensure a proper standard of development and appearance in the interests of conserving the amenities and special qualities of the area. Policy: Local Development Plan 2 – Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation of the Pembrokeshire Coast National Park), 25 (Recycled, Secondary and Waste Materials), 29 (Sustainable Design), 30 (Amenity), 31 (Minimising Waste), 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

9. No development shall commence until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should include:
- Construction methods including details of materials, waste, and contaminated land.
 - General Site Management: construction programme, site clearance requirements, construction drainage, site set-up plan detailing sensitive receptors and buffer zones, relevant protection measures e.g. fencing, etc.
 - CEMP masterplan: detailing the development, location of landscape and environmental resources, design proposals and objectives for integration and mitigation.
 - Control of Nuisances: restrictions on timing / duration / frequency of works, e.g. noise / vibration from piling activities, acoustic barriers, dust control measures, control of light spill and conservation of dark skies.
 - Resource Management: fuel and chemical storage, waste management, water consumption, energy consumption.
 - Pollution Prevention: demonstrate compliance with relevant Guidelines for Pollution Prevention, incident response plan, site drainage plan.
 - Landscape/ecological clerk of works to ensure construction compliance with approved plans and environmental regulations.
 - Details of the persons/bodies responsible for particular activities associated with the CEMP and emergency contact details.

The CEMP shall be implemented as approved during the site preparation and construction phases of the development.

Reason: To ensure necessary management measures are agreed prior to commencement of development or phase of development and implemented for the protection of the environment during construction. Policy: Local Development Plan 2 - Policies 1 (National Park Purposes and Duty), 8 (Special Qualities), 10 (Sites and Species of European Importance), 11 (Nationally Protected Sites and Species), 14

(Conservation of the Pembrokeshire Coast National Park) and 30 (Amenity).

- 10.** Before development commences details of the pedestrian visibility splays shall be submitted to the Local Planning Authority for approval. The dwelling(s)/building(s) shall not be occupied, nor the use commenced until the junction has been constructed and is available for use in accordance with the approved plans.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 11.** Notwithstanding the submitted drawings the off-street parking facilities (for all vehicles, including cycles) shown on the plan reference: 9720-RLL-XX-00-DR-A-S01005/RevA shall include 1 disabled parking space and a revised layout plan shall be submitted to the local Planning Authority for approval in writing. The agreed parking and cycle storage must then be provided before the building is first occupied, and thereafter retained for that purpose.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 12.** Before any housing construction work is commenced the access, parking and turning area must be constructed up to and including road base level and be suitably drained for the use of construction traffic and approved visibility splays constructed.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 13.** All surface water shall be trapped and disposed of so as not to flow onto any part of the public highway.

Reason: To reduce the likelihood of obstruction of the highway or danger to road users. Policy: Local Development Plan 2 – Policies 59 (Sustainable Transport) and Policy 60 (Impacts of Traffic).

- 14.** The proposed development shall be completed in full adherence to the arboricultural details contained in ArbTS_973.2_Former Post/Delivery Office Arboricultural Report 9th December 2021 submitted to this authority. Any variations to the details of the documents and plans must only be undertaken after the proposed variations have been agreed, in writing, by the Local Planning Authority. Upon completion of the development, this authority will be provided with clear and obvious proof that the details of the Arboricultural Method Statement have been adhered to. Proof will be demonstrated through the submission of written confirmation from the Arboricultural Consultant which summarise the details of each visit, including where relevant photographic evidence of adherence to the Arboricultural Method Statement and Tree Protection Plan.

Reason: In the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation, and enhancement of links between sites and their protection for amenity, landscape, and biodiversity value. Policy: Local Development Plan 2 – Policies: 1 (National Park Purposes and Duty), 8 (Special Qualities), 14 (Conservation and enhancement of the Pembrokeshire Coast National Park), 30 (Amenity), Technical Advice Notes - (TAN) 5: Nature Conservation and Planning (2009) and (TAN) 10: Tree Preservation Orders (1997).

- 15.** Development shall not begin until an appropriate photographic survey of the existing building(s) has been carried-out, in accordance with guidelines provided by the Local Planning Authority's archaeological advisors - Dyfed Archaeological Trust- Heritage Management. The resulting photographs should be approved by the Local Planning Authority, prior to the commencement of development and deposited by the Local Planning Authority with the regional Historic Environment Record, held and maintained by the Dyfed Archaeological Trust.

Reason: To protect historic environment interests whilst enabling development. Policy: Local Development Plan 2 - Policy 8 (Special Qualities) and Planning Policy Wales (Edition 11).

- 16.** No development shall commence until a drainage scheme for the site has been submitted to and approved in writing by the local planning authority. The scheme shall provide for the disposal of foul, surface, and land water, and include an assessment of the potential to dispose of surface and land water by sustainable means. Thereafter the scheme shall be implemented in accordance with the approved details prior to the occupation of the development and no further foul water, surface water and land drainage shall be allowed to connect directly or indirectly with the public sewerage system.

Reason: To prevent hydraulic overloading of the public sewerage system, to protect the health and safety of existing residents and ensure no pollution of or detriment to the environment. Policy: Local Development Plan 2 – Policy 29 (Sustainable Design).

Informatives

The applicant's attention is drawn to the attached Dyfed Archaeological Trust consultation response.

The applicant's attention is drawn to the attached Natural Resources Wales consultation response.

The applicant's attention is drawn to the attached Welsh Water Informative.

The applicant's attention is drawn to the attached PCC Drainage Engineers consultation response.

Fire Authority:

The developer should consider the need to provide adequate water supplies for fire fighting purposes on the site and general guidance on this matter is given in the attached Appendix and the following link:

<https://www.water.org.uk/guidance/national-guidance-document-on-the-provision-of-water-for-firefighting-3rd-edition-jan-2007/>

Furthermore, the applicant should be advised to contact the Local Authority Building Control Department, which is the responsible authority, when determining issues concerning means of warning and escape, internal fire spread (linings and structure), external fire spread, access and facilities for the Fire and Rescue Service, in accordance with the 2007 version of Approved Document B (Wales).

Ecology:

It is recommended that the applicant be informed that all British bat species are European Protected Species by virtue of their listing under Annex IV of EC Directive 92/43/EEC ('The Habitats Directive'). This Directive has been transposed into British Law under the Conservation of Habitats and Species Regulations 2017. British bats are also protected under Schedule 5 of the Wildlife and Countryside Act (1981) (as amended).

It is recommended that the applicant and contractors be informed of the possibility of encountering bats unexpectedly during works.

If bats are encountered on site works should stop immediately and an NRW should be contacted (Natural Resources Wales, - General Enquiries: enquiries@naturalresourceswales.gov.uk or 0300 065 3000 Mon-Fri, 8am - 6pm) a licence may then need to be applied for from NRW. Licences are not automatically granted by virtue of a valid planning consent and it may be possible that the necessary licence application may be refused.

Rev.	Date	Description
A	24/09/2021	North Point Added



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Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Site Location Plan

STATUS
S0 Initial Status or WIP

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SCALE 1:1250@A3 ORIGINATOR NO 9720
DATE 14/05/2020 AUTHOR AW

DRAWING NUMBER: 9720-RL-XX-00-BR-A-S01001 REVISION: A
Page 65 of 201
PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER

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Rev.	Date	Description
A	24/09/2021	North Point Added



PROJECT

Warren Street Tenby

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Block Plan

Ground Floor

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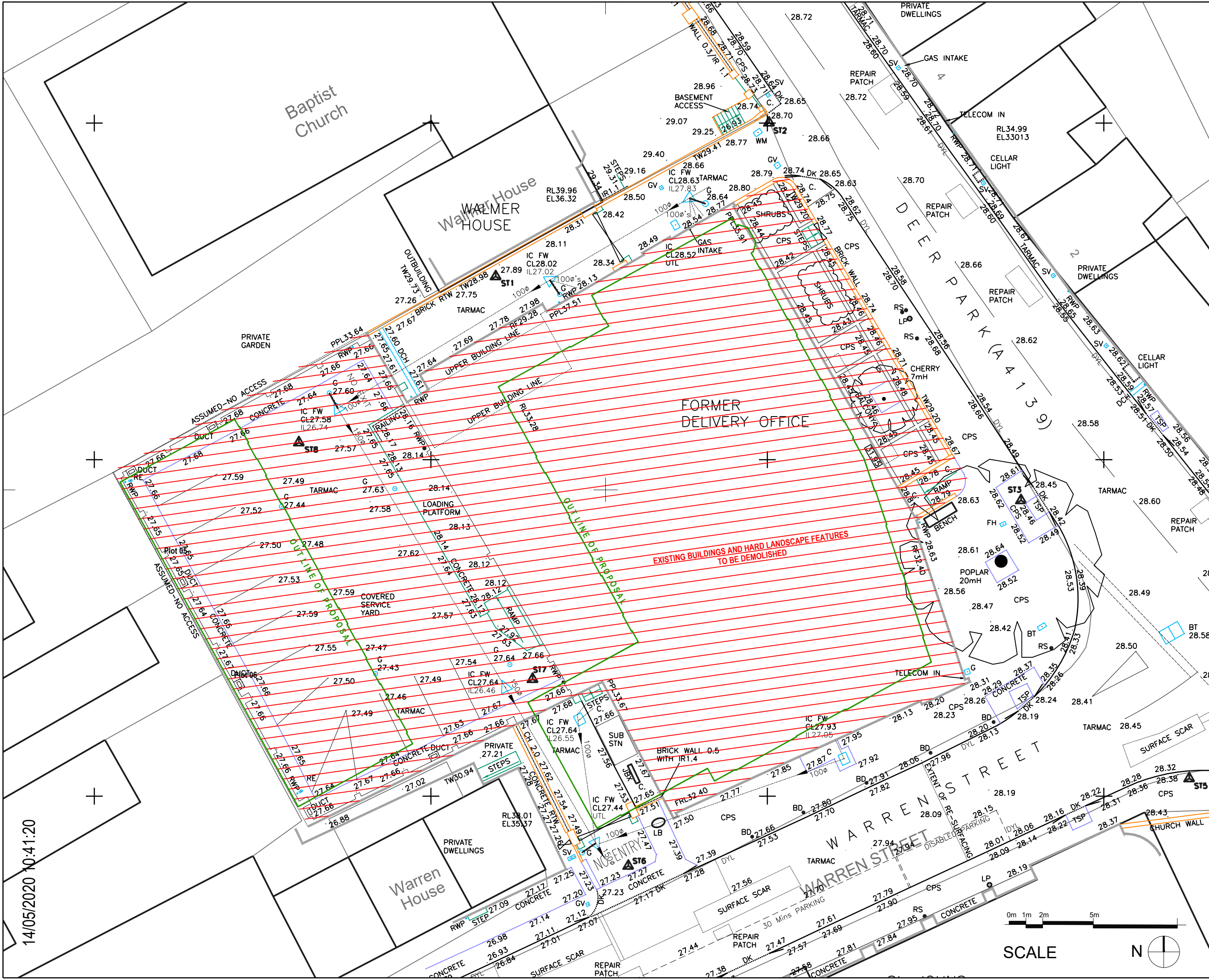
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Page 66 of 201
9719-RELXX-00-DR-A-S01002 A

PROJECT	ORIGINATOR	ZONE	LEVEL	TYPE	ROLE	NUMBER
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Rev.	Date	Description
A	12/11/2020	Existing building footprint shaded
B	18/01/2021	Issued for pre-application consultation
C	01/03/2021	Demolition notes added
D	24/09/2021	North Point Added

PROJECT

Warren Street Tenby

CLIENT

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DRAWING

Topographic Survey Plan Overlay Ground Floor

STATUS

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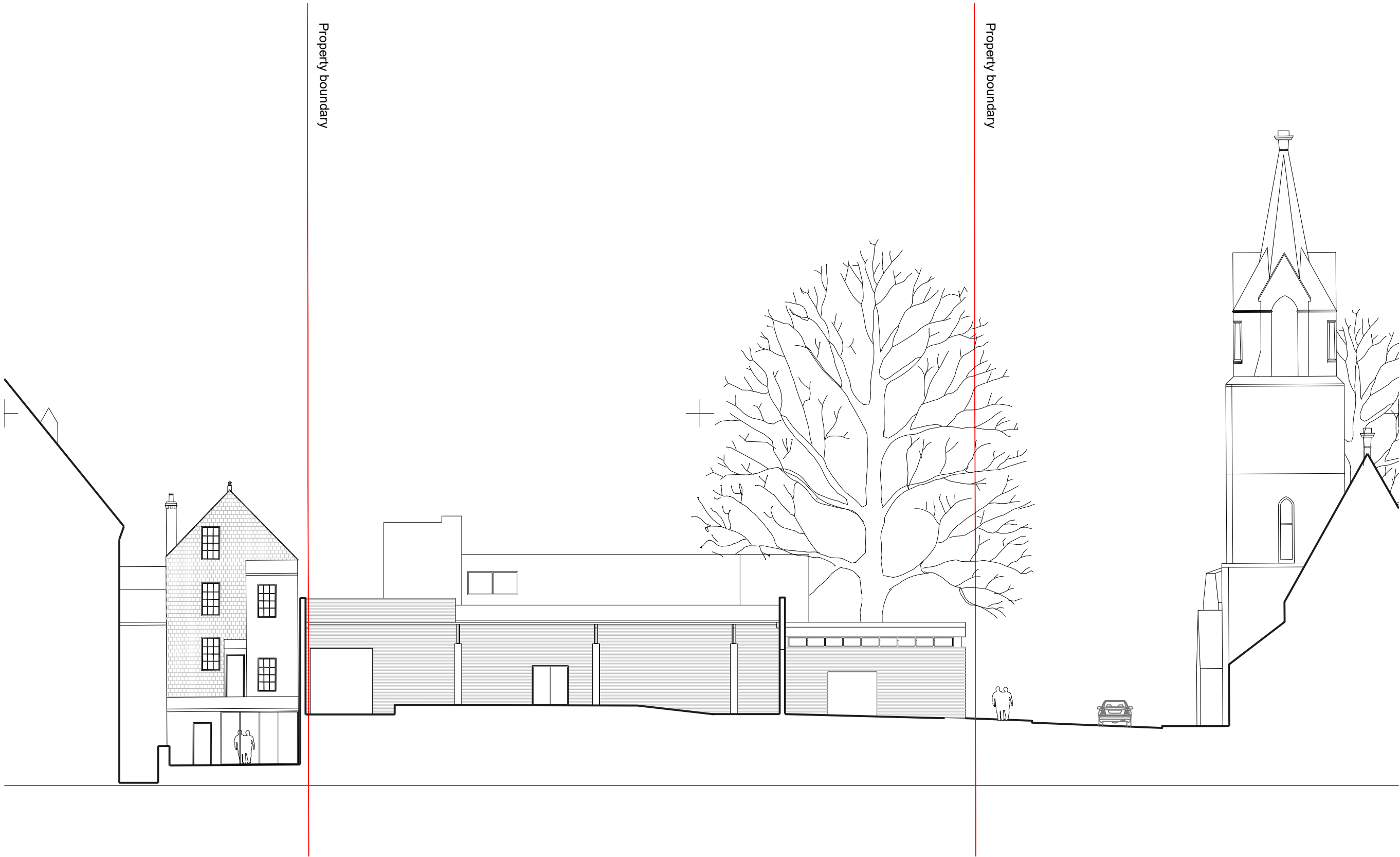
DATE 09/11/2020

AUTHOR AW

DRAWING NUMBER: 9720-RL-XX-00-001-A-S010004

REVISION: D

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PROJECT
Warren Street Tenby

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DRAWING
Elevation
Site Section / Rear
Elevation as Existing

STATUS
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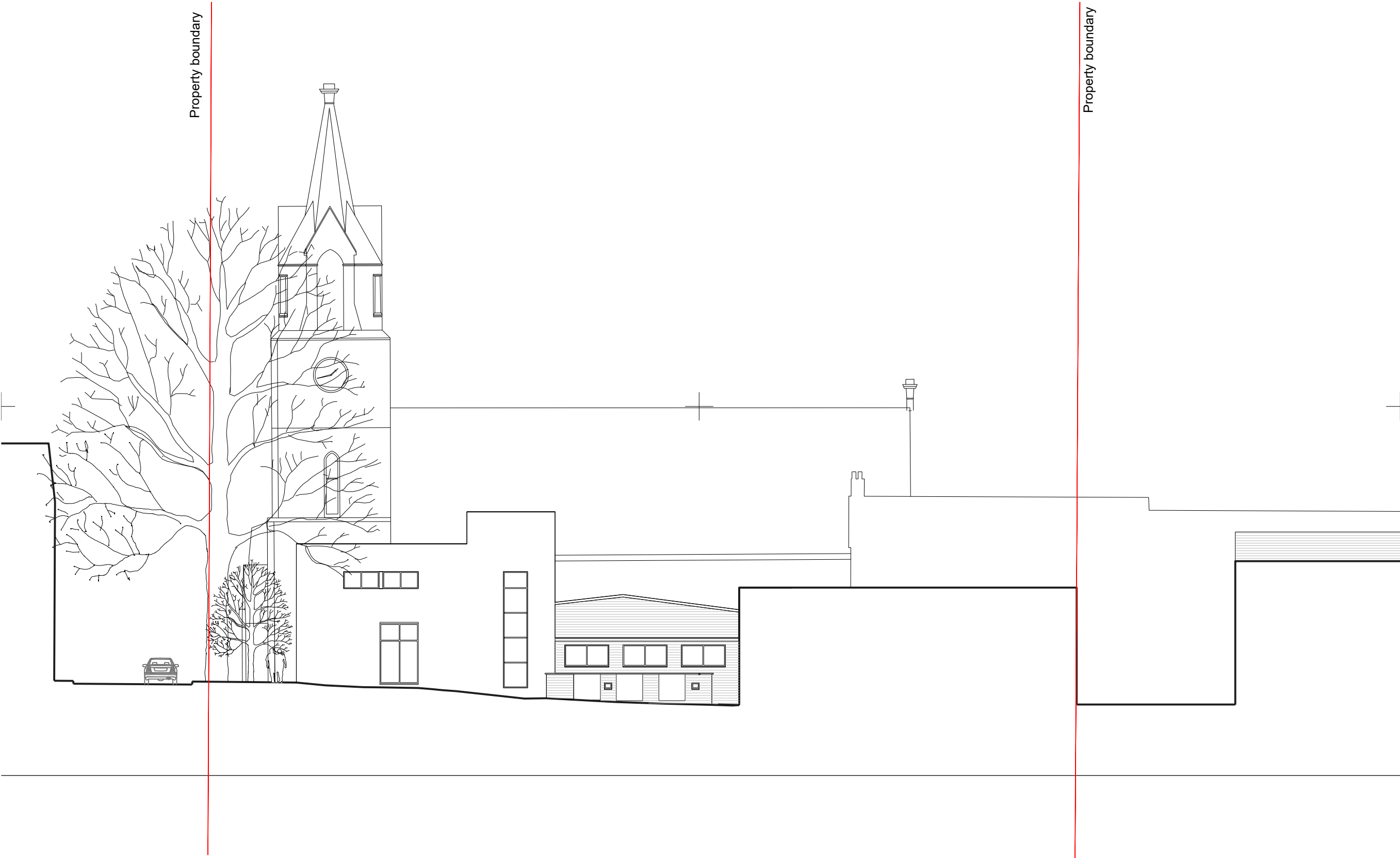
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REVISION:

Page 68 of 201

PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER



SCALE



PROJECT
Warren Street Tenby

CLIENT
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DRAWING
Elevation
Site Section / Flank
Elevation as Existing

STATUS
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Rev.	Date	Description
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PROJECT
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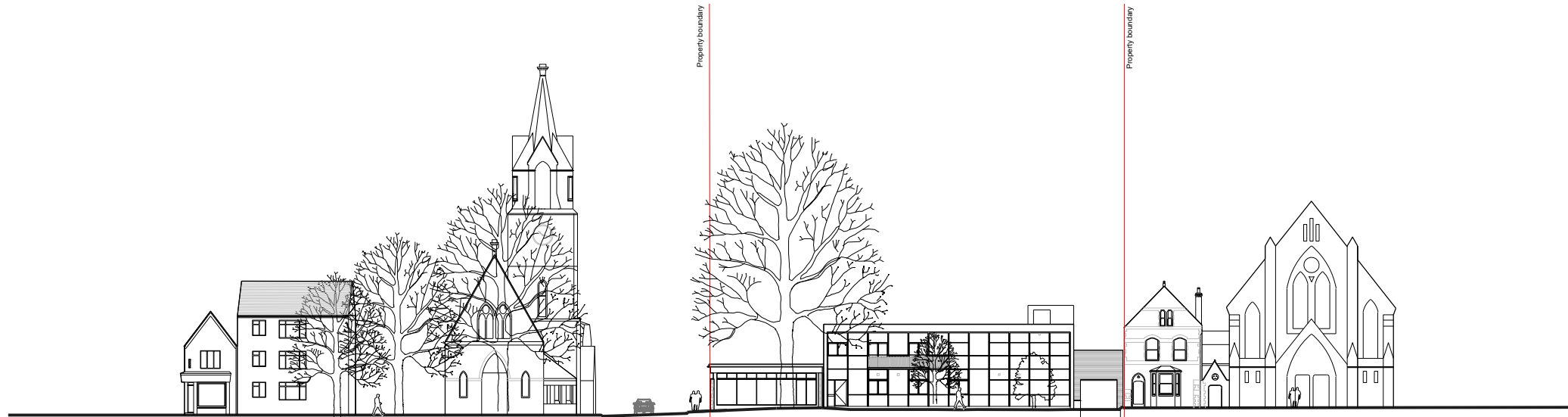
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Elevation
Warren Street as Existing

STATUS
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REVISION: 1
Page 70 of 201



01 Street Elevation along Deer Park / South Parade



02 Street Elevation along Warren Street



SCALE



PROJECT
Warren Street Tenby

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Street Elevations
as Existing

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DATE	AUTHOR
14/01/2021	DP

Legend

- Wild Meadow Mix: Emorsgate EM3
- Flowering Lawn Mix: Emorsgate EL1
- Native Hedgerow Species
- Native Tree: Prunus avium
- Native Shrubs

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PROJECT

Warren Street Tenby

CLIENT

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DRAWING

Native Planting Locations

STATUS

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DRAWING NUMBER REVISION

9720-RL-XX-001-BA-S01302

PROJECT ORIGINATOR (SCALE) (TYPE) (NO.) (REVISION)

14/05/2020 10:41:20

Walmer House

ptist
nurch

Warren
House

WARREN STREET

Commercial
/ Retail

Bins

Bins
(com)

Post

Meter
Room

Pump
Room

Lift

Plot 04

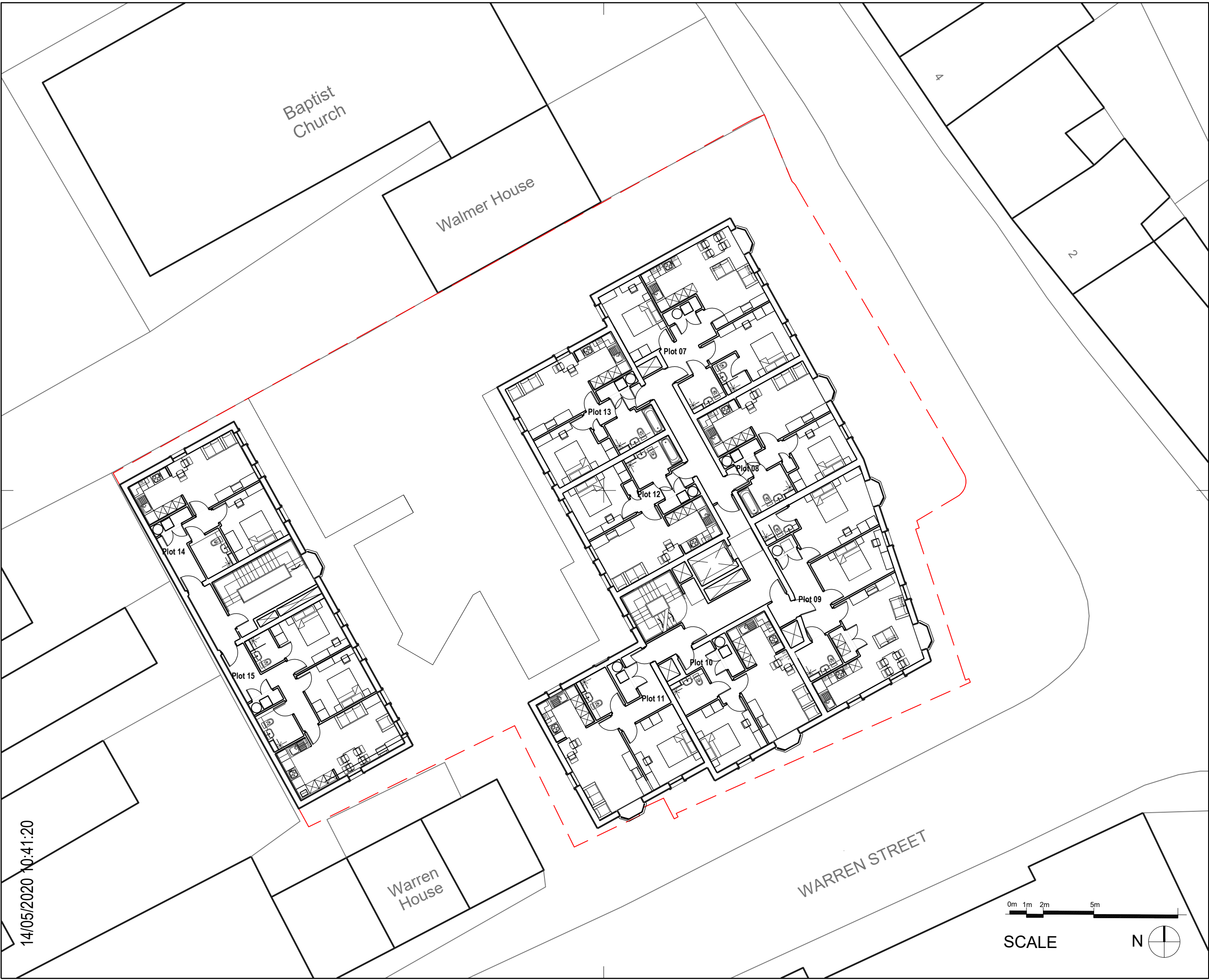
Plot 03

Plot 02

Plot 01

Plot 06

Plot 05



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Rev.	Date	Description
A	12/11/2020	Minor revisions to fenestration
B	18/01/2021	Updates to mews layout, issued for pre-application consultation
C	24/09/2021	North Point Added



PROJECT
Warren Street Tenby

CLIENT
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DRAWING
General Arangement Plan
First Floor

STATUS
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Rev.	Date	Description
A	12/11/2020	Minor revisions to fenestration
B	18/01/2021	Updates to mews layout, issued for pre-application consultation
C	24/09/2021	North Point Added



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
General Arrangement Plan
Second Floor

STATUS
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DATE 14/05/2020
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DRAWING NUMBER: 9720-RLL-XX-02-DR-A-01102
REVISION: C
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Rev.	Date	Description
A	12/11/2020	Minor revisions to fenestration
B	18/01/2021	Updates to set-back, issued for pre-application consultation



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
General Arangement Plan
Third Floor

STATUS
S0 Initial Status or WIP

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ORIGINATOR NO

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AW

DRAWING NUMBER:
Page 75 of 201
Project: Warren Street Tenby
Revision: B



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Rev.	Date	Description
A	12/11/2020	Minor revisions to fenestration
B	18/01/2021	Updates to set back, issued for pre-application consultation



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
**General Arangement Plan
Fourth Floor**

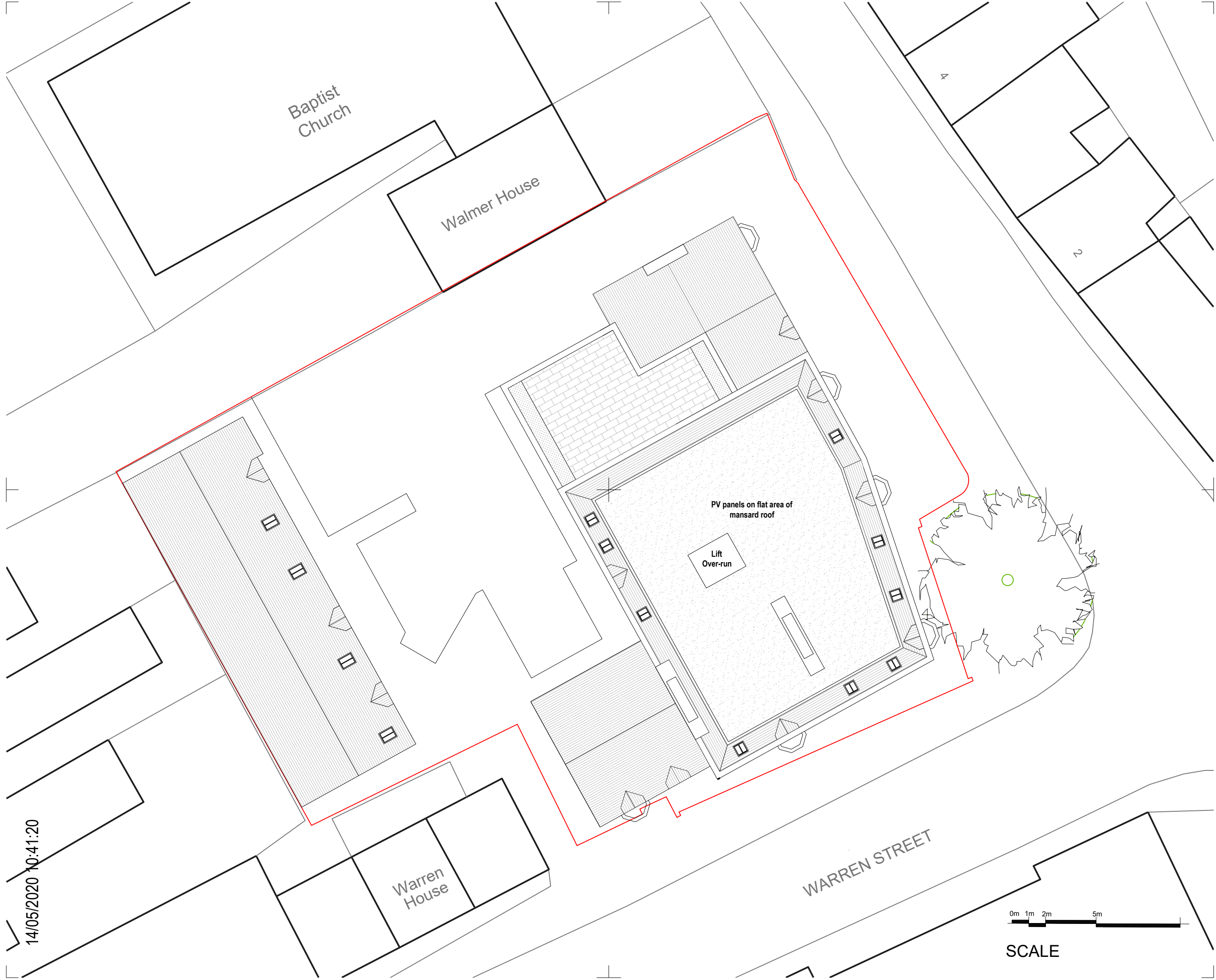
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Page 76 of 201



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Rev.	Date	Description
.	.	.

PROJECT

Warren Street Tenby

CLIENT

Telereal Trillium

DRAWING

General Arangement Plan
Roof

STATUS

S0 Initial Status or WIP

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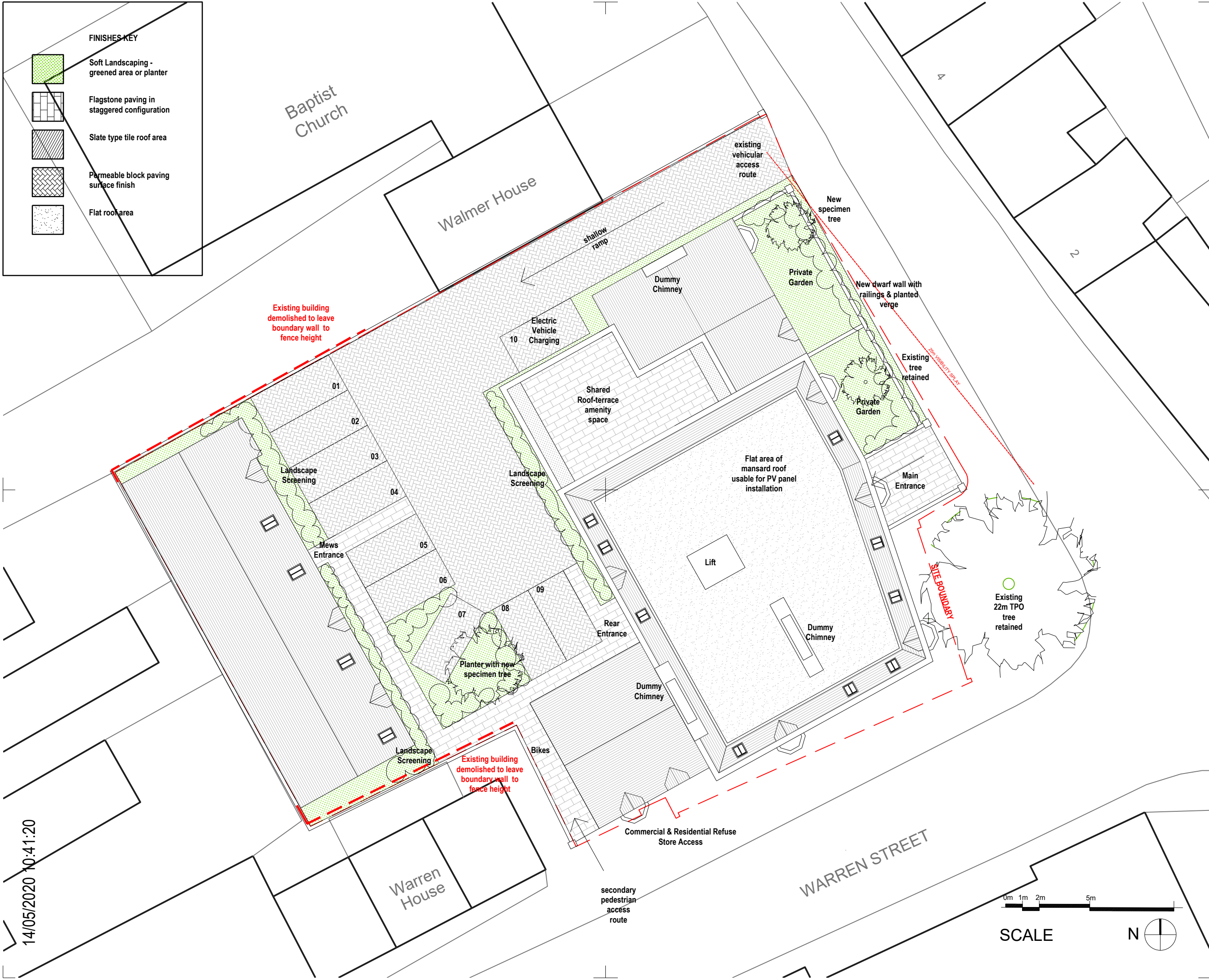
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14/05/2020	AW

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9126-PRLL-XX-RP-DRA-01105	.

Page 77 of 201

PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER



FINISHES KEY

- Soft Landscaping - greened area or planter
- Flagstone paving in staggered configuration
- Slate type tile roof area
- Permeable block paving surface finish
- Flat roof area

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Rev.	Date	Description
A	24/09/2021	North Point Added

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PROJECT
Warren Street Tenby

CLIENT
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DRAWING
Site Layout Plan

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Rev.	Date	Description
A	12/11/2020	Minor revisions to fenestration
B	18/01/2021	Updates to tracking, issued for pre-application consultation
C	24/09/2021	North Point Added



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
General Arangement Plan
Ground Floor

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Rev.	Date	Description
A	24/09/2021	Material Schedule Added



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Elevation
Deer Park Road as Proposed

STATUS
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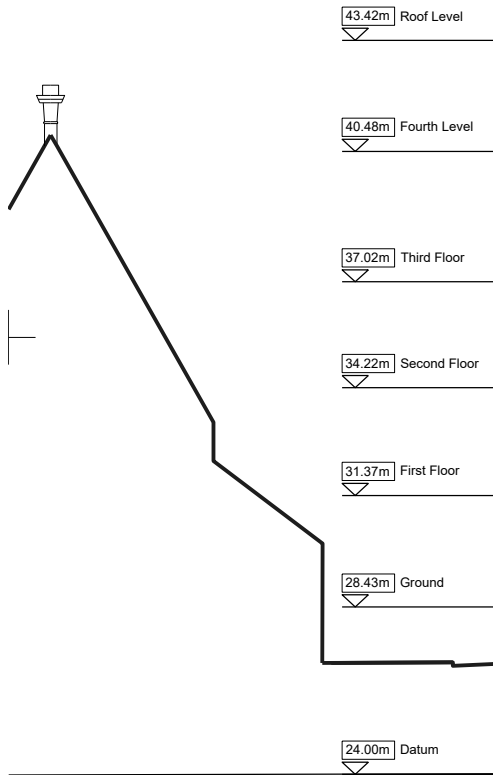
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REVISION: A
PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER

0m 1m 2m 5m

SCALE

FINISHES KEY	
	ROOF FINISH Slate tile finish roof / mansard
	WALL FINISH Multi-coloured smooth render finish to pastel shades, indicatively as shown

FINISHES LEGEND		
①	WINDOWS	Painted wooden split-pane double glazed sash windows
②	SHOP FRONT	Wooden traditional style shop-front glazing
③	CONTRAST DETAILING	White render profiled quoining / cornices
④	HOPPERS & DOWNPIPES	Cast style downpipes and hopper box in white painted finish
⑤	ROOFLIGHT	Conservation style rooflight set in line with tiling
⑥	BOUNDARY WALL	Stone-capped render finished dwarf wall with metal rod & dart railing set between piers
⑦	TAX WINDOW	Solid recessed feature



SCALE

FINISHES KEY	
	ROOF FINISH Slate tile finish roof / mansard
	WALL FINISH Multi-coloured smooth render finish to pastel shades, indicatively as shown

FINISHES LEGEND		
①	WINDOWS	Painted wooden split-pane double glazed sash windows
②	SHOP FRONT	Wooden traditional style shop-front glazing
③	CONTRAST DETAILING	White render profiled quoining / cornices
④	HOPPERS & DOWNPIPES	Cast style downpipes and hopper box in white painted finish
⑤	ROOFLIGHT	Conservation style rooflight set in line with tiling
⑥	BOUNDARY WALL	Stone-capped render finished dwarf wall with metal rod & dart railing set between piers
⑦	TAX WINDOW	Solid recessed feature

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A	24/09/2021	Material Schedule Added



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Elevation
Site Section / Mews Elevation
as Proposed

STATUS
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A	24/09/2021	Material Schedule Added



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Elevation
Site Section / Rear
Elevation as Proposed

STATUS
S0 Initial Status or WIP

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PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER



0m 1m 2m 5m

SCALE

FINISHES KEY



ROOF FINISH
Slate tile finish roof / mansard



WALL FINISH
Multi-coloured smooth render finish to pastel shades, indicatively as shown



FINISHES LEGEND

- | | | |
|---|---------------------|-----------------------------------------------------------------------------------------|
| ① | WINDOWS | Painted wooden split-pane double glazed sash windows |
| ② | SHOP FRONT | Wooden traditional style shop-front glazing |
| ③ | CONTRAST DETAILING | White render profiled quoining / cornices |
| ④ | HOPPERS & DOWNPIPES | Cast style downpipes and hopper box in white painted finish |
| ⑤ | ROOFLIGHT | Conservation style rooflight set in line with tiling |
| ⑥ | BOUNDARY WALL | Stone-capped render finished dwarf wall with metal rod & dart railing set between piers |
| ⑦ | TAX WINDOW | Solid recessed feature |



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A	24/09/2021	Material Schedule Added



PROJECT
Warren Street Tenby
CLIENT
Telereal Trillium
DRAWING
Elevation
Site Section / Flank
Elevation as Proposed
STATUS
S0 Initial Status or WIP

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9720-RL-XX-ZZ-DR-A-S01113		A
PROJECT ORIGINATOR ZONE LEVEL TYPE ROLE NUMBER		



SCALE

FINISHES KEY	
	ROOF FINISH Slate tile finish roof / mansard
	WALL FINISH Multi-coloured smooth render finish to pastel shades, indicatively as shown

FINISHES LEGEND		
①	WINDOWS	Painted wooden split-pane double glazed sash windows
②	SHOP FRONT	Wooden traditional style shop-front glazing
③	CONTRAST DETAILING	White render profiled quoining / cornices
④	HOPPERS & DOWNPIPES	Cast style downpipes and hopper box in white painted finish
⑤	ROOFLIGHT	Conservation style rooflight set in line with tiling
⑥	BOUNDARY WALL	Stone-capped render finished dwarf wall with metal rod & dart railing set between piers
⑦	TAX WINDOW	Solid recessed feature



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A	24/09/2021	Material Schedule Added



PROJECT
Warren Street Tenby
CLIENT
Telereal Trillium
DRAWING
Elevation
Warren Street as Proposed

STATUS
S0 Initial Status or WIP

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DATE	AUTHOR
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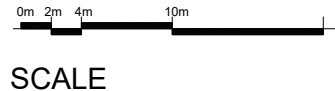
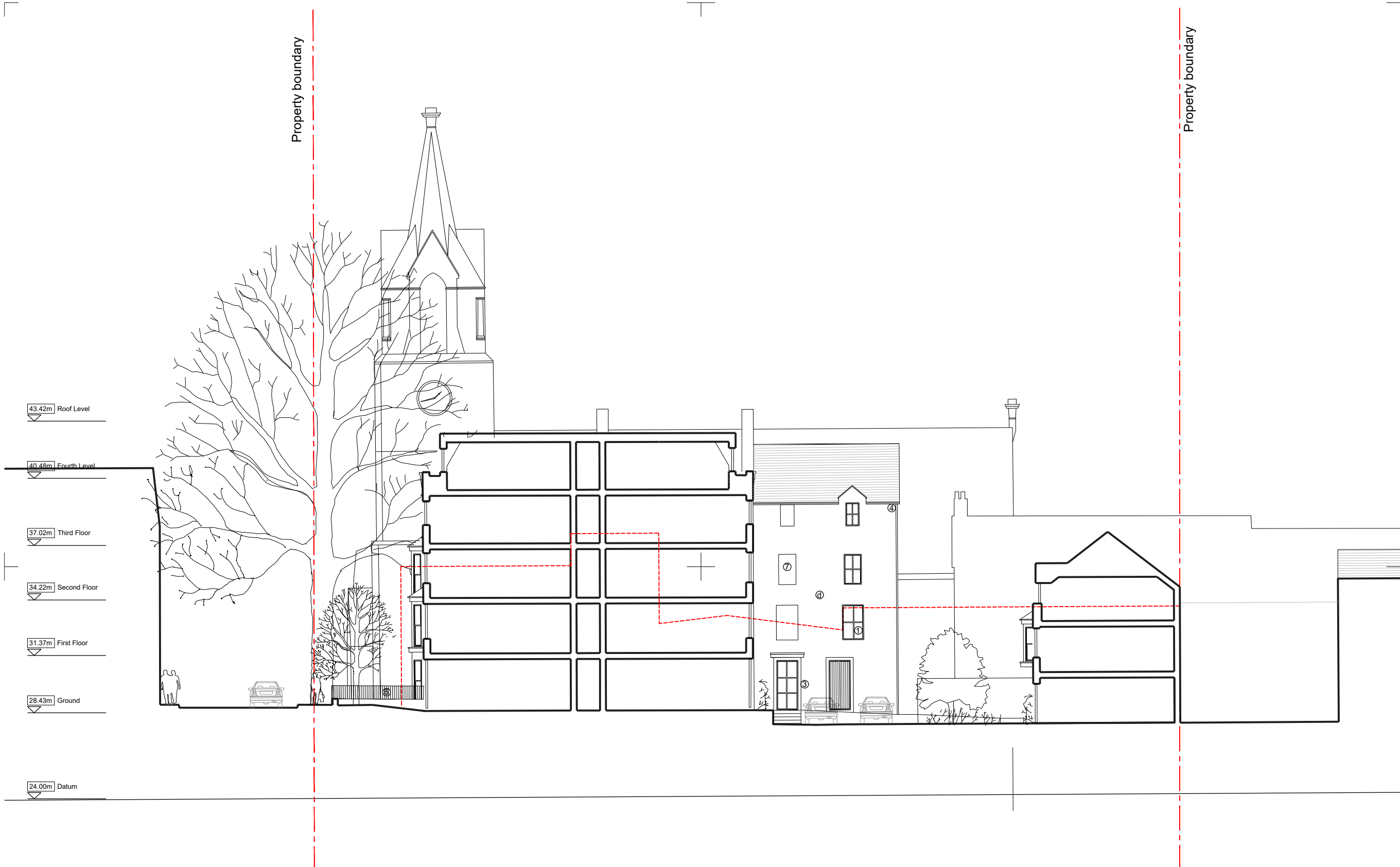
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PROJECT ORIGINATOR ZONE LEVEL TYPE ROLE NUMBER	

FINISHES KEY	
	ROOF FINISH Slate tile finish roof / mansard
	WALL FINISH Multi-coloured smooth render finish to pastel shades, indicatively as shown

FINISHES LEGEND		
①	WINDOWS	Painted wooden split-pane double glazed sash windows
②	SHOP FRONT	Wooden traditional style shop-front glazing
③	CONTRAST DETAILING	White render profiled quoining / cornices
④	HOPPERS & DOWNPIPES	Cast style downpipes and hopper box in white painted finish
⑤	ROOFLIGHT	Conservation style rooflight set in line with tiling
⑥	BOUNDARY WALL	Stone-capped render finished dwarf wall with metal rod & dart railing set between piers
⑦	TAXI WINDOW	Solid recessed feature



SCALE



SCALE

FINISHES KEY	
	ROOF FINISH Slate tile finish roof / mansard
	WALL FINISH Multi-coloured smooth render finish to pastel shades, indicatively as shown

FINISHES LEGEND		
①	WINDOWS	Painted wooden split-pane double glazed sash windows
②	SHOP FRONT	Wooden traditional style shop-front glazing
③	CONTRAST DETAILING	White render profiled quoining / cornices
④	HOPPERS & DOWNPIPES	Cast style downpipes and hopper box in white painted finish
⑤	ROOFLIGHT	Conservation style rooflight set in line with tiling
⑥	BOUNDARY WALL	Stone-capped render finished dwarf wall with metal rod & dart railing set between piers
⑦	TAX WINDOW	Solid recessed feature

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A	24/09/2021	Material Schedule Added



PROJECT
Warren Street Tenby

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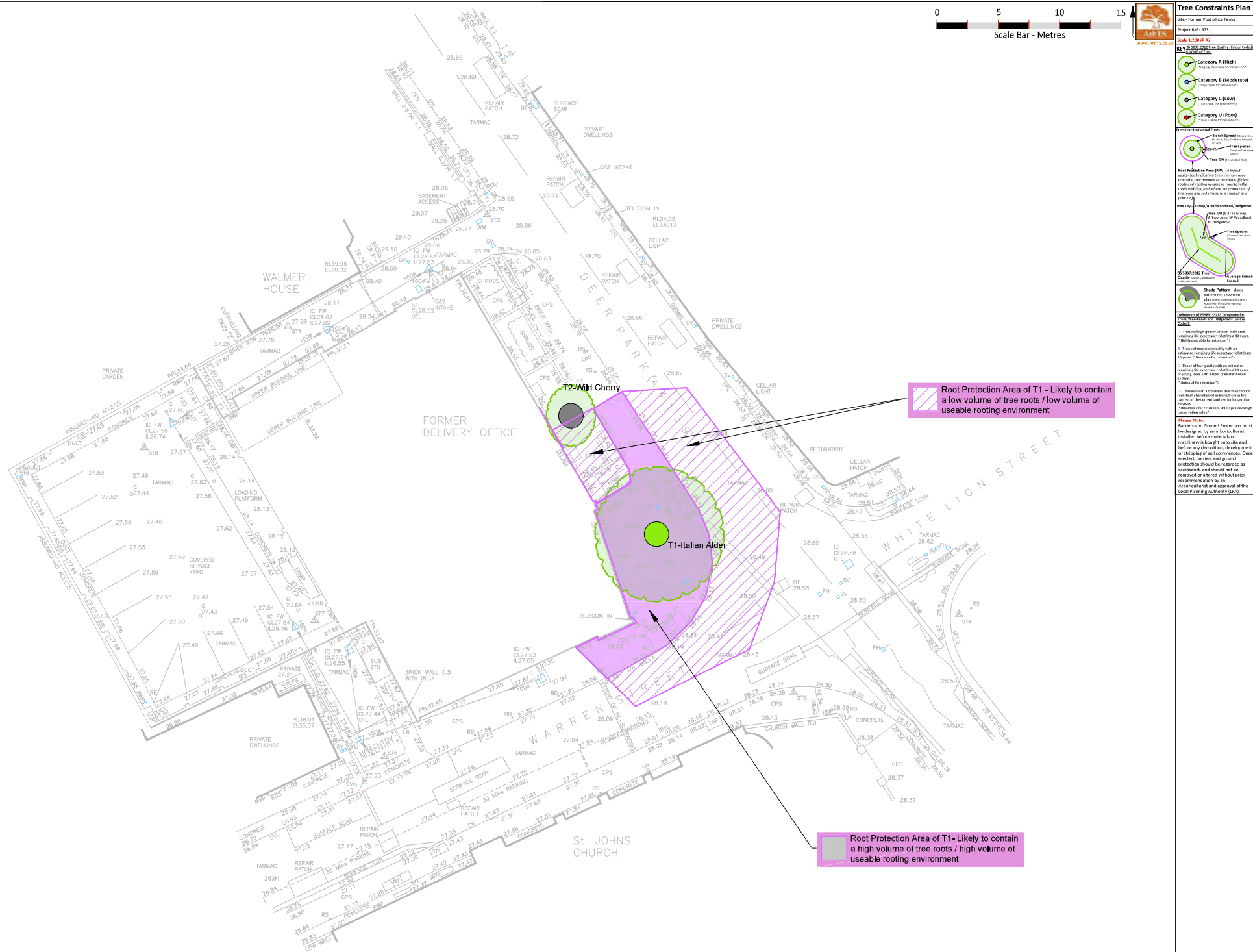
DRAWING
Elevation
Site Section as Proposed

STATUS
S0 Initial Status or WIP

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DATE 14/01/2021	AUTHOR DP

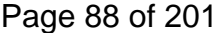
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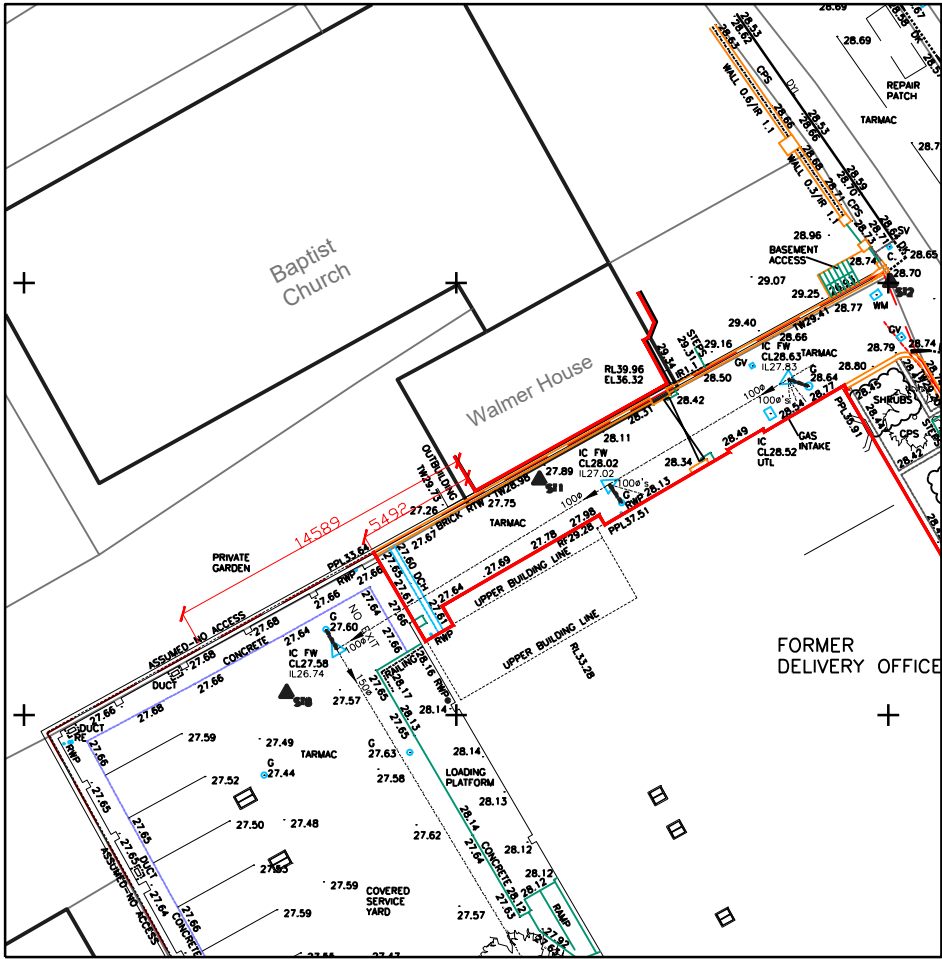




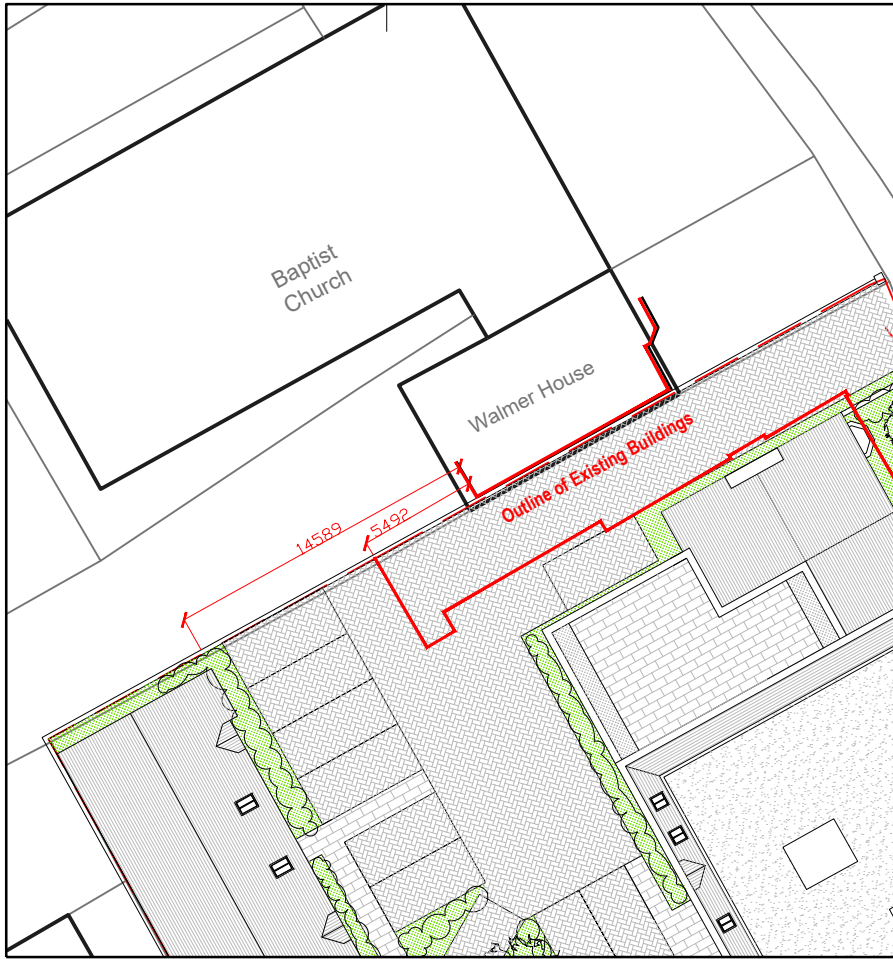
Root Protection Area of T1 - Likely to contain a low volume of tree roots / low volume of useable rooting environment

Root Protection Area of T1- Likely to contain a high volume of tree roots / high volume of useable rooting environment





01 Detail Plan as Existing
1 : 350



02 Detail Plan as Proposed
1 : 350



03 Detail Section of Boundary condition
1 : 200



04 Site Section along boundary condition
1 : 200

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PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
General Arrangement Plan
Roof

STATUS
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DATE
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1



01 Street Elevation along Deer Park / South Parade



02 Street Elevation along Warren Street



SCALE



PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Street Elevations
as Proposed

STATUS
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PROJECT
Warren Street Tenby

CLIENT
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DRAWING
Computer Visualisation
View 05 ¼ Birdseye View

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DRAWING NUMBER: 926-01-01-01
REVISION: 01
PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER





PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Computer Visualisation
View 06 Roofscape View

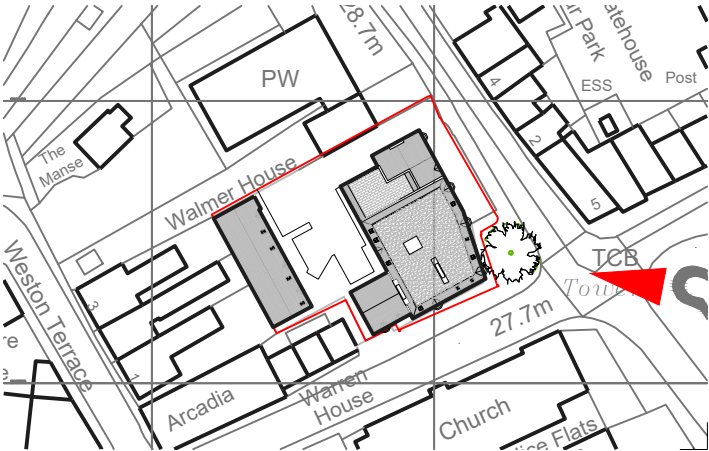
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PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Computer Visualisation
View 04 From White Lion Street

STATUS
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PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER





PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Computer Visualisation
View 03 From Town Wall

STATUS
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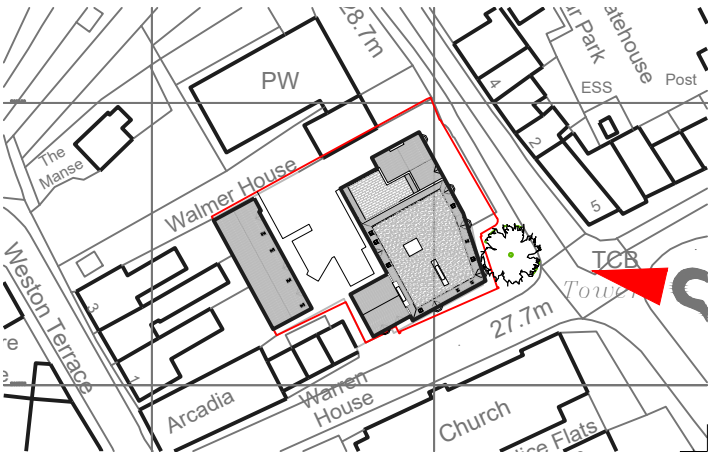
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PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Computer Visualisation
View 08 Along Warren Street

STATUS
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REVISION: 01
PROJECT | ORIGINATOR | ZONE | LEVEL | TYPE | ROLE | NUMBER







PROJECT
Warren Street Tenby

CLIENT
Telereal Trillium

DRAWING
Computer Visualisation
View 01 Along Dear Park

STATUS
S0 Initial Status or WIP

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926-08-01-01		Page 08 of 201
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