Application Ref: NP/18/0326/FUL

Case Officer
Sally Tyler

Applicant
Ms G Young, Parking Eye Ltd

Agent
Proposal
Erection of car park management camera column & associated electrical cabinet

Site Location
Grove Hotel, 51, High Street, St Davids, Haverfordwest, Pembrokeshire, SA62 6SB

Grid Ref
SM75672528

Date Valid 01-Jun-2018       Target Date 06-Dec-2018

This application has been referred to Planning Committee for decision as support has been received from St. David's City Council, which is contrary to the Planning Officer's recommendation for refusal.

Consultee Response

St Davids City Council: Supporting
PCNPA Planning Ecologist: No comment
PCC - Transportation & Environment: No objection
PCNPA Buildings Conservation Officer: Recommend Refusal

Public Response

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. No public response has been received.

Policies considered

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website - http://www.pembrokeshirecoast.org.uk/default.asp?PID=549

LDP Policy 01 - National Park Purposes and Duty
LDP Policy 05 - St Davids Local Centre
LDP Policy 08 - Special Qualities
LDP Policy 11 - Protection of Biodiversity
LDP Policy 13 - Historic Landscapes Parks and Gardens
LDP Policy 14 - Protection of Buildings of Local Importance
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
SPG05 - Sustainable Design
SPG06 - Landscape

Pembrokeshire Coast National Park Authority
Development Management Committee – 5th December 2018
SPG12 - Parking  
SPG13 - Archaeology  
SPG17 - Conservation Area Proposals  
TAN 12 - Design  
TAN 13 - Tourism  
TAN 24 - The Historic Environment

**Constraints**

NPA Property - within 25m  
LDP Designation  
Biodiversity Issue  
Historic Landscape  
Safeguarding Zone  
Hazardous Zones  
LDP Centre: 50pc aff housing; 30 units/ha  
Recreation Character Areas  
Article 4 Directions  
Landscape Character Assessment  
Listed Building - Within 10m

**Planning history**

NP/18/0328/LBA Installation of external cabinet in conjunction with proposed car park management 01-Jun-2018 withdrawn

NP/18/0235/LBA Erection of children's play area within amenity grounds of hotel 19-Apr-2018 withdrawn

NP/18/0234/FUL Erection of children's play area within amenity grounds of hotel 19-Apr-2018 withdrawn

NP/17/0289/TCA Works to trees as per submitted plan and Tree Survey 17-May-2017 approved

NP/16/0004/TCA Removal of Holm Oak Tree in Grounds of The Grove Hotel 04-Jan-2016 approved

NP/11/533/CAC Demolition of existing outbuildings & erection of two storey hotel accommodation 22-Dec-2011 withdrawn

NP/11/532/FUL Demolition of existing outbuildings & erection of two storey hotel accommodation 22-Dec-2011 withdrawn
Officers Appraisal

Description of Proposal

The proposed development involves installation of an ANPR (actual number plate recognition) car park management system, which involves mounting of a camera to a 5 meter lighting column, finished in powder coated black.

Much negotiation has taken place between applicant and case officer as to the position of the lighting column and the height at which the camera can be installed. The proposed position of the column is currently to the north of the existing grassed area to the east of the grade II listed hotel, abutting the walls of the grade II listed walled garden.

Options for mounting the camera at low level behind the modern boundary wall and positioning of column in far north east corner of site have been discussed and are considered to be unsuitable by the applicant.

Site and Context

House and Garden
Grove Hotel is a characterful, grade II listed, detached, former gentleman’s villa. First listed in 1981, the hotel is situated within the settlement boundary of St David’s, in a prominent position at the eastern edge of the conservation area. The property is set in extensive grounds, with a walled garden which is listed grade II in its own right. As a whole, the estate was designed to be seen, as a statement of status. It forms a key edge-of-town property, creating a prominent focal point at the entrance to St Davids conservation area when approached from the east.

The house is a good example of a late Georgian suburban villa built c 1816 for a local magistrate, apparently with stone stolen from the Cathedral Close. In c 1870 the property was converted to the town’s premier hotel, a terminus for coaches from Haverfordwest.

The property is of two storey, constructed of rubble stone with heavy Caerbwyd stone quoins under a hipped slate eaves roof, with painted timber detailing. The frontage has 3 bays, and was formerly rendered and whitewashed, featuring painted sashes and decorative central doorcase. Other elevations are stucco, painted white, with rear wings added at later dates and other modern additions, such as double gabled sunroom to the eastern elevation. A modern boundary wall has been added in the position of the historic boundary treatment, to separate the carpark from the highway, and the forecourt of the hotel opened up to allow use as a terrace. The former lawn has been converted into the carpark.

The walled garden to the north of the hotel is of the same date as the house and has retained its original rubble stone walls.
Conservation Area

The St David’s conservation area has been designated due to its importance as an area of historic, architectural, archaeological, cultural, aesthetic and natural significance. The ‘City’ streetscape (conservation area ‘City’ zone identified in St Davids Conservation Area Supplementary Planning Guidance 2011) has a strong palette of materials and forms, well preserved, with a unique vernacular character, incorporating “icon” buildings of outstanding significance (the Grove Hotel of which is one). The conservation area is subject to an Article 4 Direction, and is included in CADW’s Register of Landscapes of Outstanding Historic Interest in Wales, which reflects the importance of permitting only sensitive, well-considered development which protects and enhances the character of the area.

Both the hotel and the walled garden form prominent features at the gateway to the conservation area, juxtaposed with the well-considered, sensitively designed, contemporary Oriel-y-Parc building to the other side of the highway.

The belt of sycamores along the eastern boundary of the site have been identified as a feature of importance to the setting of the conservation area.

Key Issues

The application raises the following planning matters:

- Policy and Principle of Development
- Siting, Design and Impact upon the Special Qualities of the National Park
- Access and Parking
- Landscaping
- Biodiversity
- Historic Landscape
- Other Matters

Policy and Principle of Development:

The site lies within both the settlement boundary and conservation area of St. David’s as defined within the Local Development Plan (LDP) 2010. In this location, the installation of equipment for car park management is acceptable in principle.

The application site is located within St Davids Conservation area. Under the Planning, Listed Building & Conservation Areas Act 1990 local planning authorities are required to designate Conservation Areas, (Section 69.2) which are “areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance”, (Section 69.1). Upon designation of such area, it is the responsibility of the Authority to consider the effect of development proposals on the character and appearance of the Conservation Area.

Similarly, the purpose of the Authority’s adopted Supplementary Planning Guidance (SPG) on the St. David’s Conservation Area (2011) is ‘to preserve and enhance the special architectural, archaeological and historic qualities which contribute to the character of St Davids Conservation Area [and] to ensure that all new works and
development respect and add to the special character of the Conservation Area and that no new works detract from or harms its character.

Due to the development’s height, utilitarian appearance and prominent positioning, officers consider that an unacceptable level of adverse impact will be caused to the physical context, views into, and special characteristics of the conservation area, and the proposed development fails to conserves or enhances its special qualities.

The application site lies within the curtilage of 2 no. grade II listed structures. The setting of listed buildings/structures is a material planning consideration that must be given significant weight in any planning decision, as required by section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act requires the Authority to have special regard to the desirability of preserving the setting of listed buildings when determining applications.

Chartered Association of Building Engineers (CABE) guidelines suggest that ‘good development should avoid insensitive modern design’ and encourage ‘new development which respects the character of the historic environment in terms of scale, materials and detail’ (Building in Context – new development in historic areas CABE, 2001). Due to the development’s height, utilitarian appearance and prominent positioning, officers consider that it will cause an unacceptable level of adverse on the setting of 2 no. listed assets. Officers consider that more a more sensitive and discreetly designed solution can be found which preserves and enhances the setting of the listed assets.

In its current form the proposal is not considered to be acceptable in policy terms as it would have an adverse impact on this area of the National Park. As such, the proposal is contrary to policies 8(criterion b), 15(criteria a & b), 29 (criterion a) and 30 (criterion d) of the adopted Pembrokeshire Coast National Park Local Development Plan.

Siting, Design and Impact upon the Special Qualities of the National Park:
Policy 8 of the LDP refers to the special qualities of the National Park with poor design being discouraged by criterion (b). Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria (a) and (b) resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criterion (d) resists development that would fail to harmonise with, or enhance the landscape character of the National Park. Policy 29 of the LDP seeks to encourage development that is well designed in terms of place and local distinctiveness (criterion (a)). Policy 30 of the LDP seeks to avoid development that is of an incompatible scale with its surroundings (criterion (b)) or is visually intrusive (criterion (d)).

The landscape character assessment Supplementary Planning Guidance adopted by the Authority in 2011 (a material planning consideration) provides management guidance for St David’s, which states that new development should ‘maintain the integrity of historic buildings and archaeological sites, with particular emphasis on their visual setting, [and] preserve the traditional city character, through planning of developments to ensure they are in keeping with the character of the traditional built

Pembrokeshire Coast National Park Authority
Development Management Committee – 5th December 2018
form, [specifically] rehabilitating the edges of the settlement so as to be more sympathetic to the surrounding Landscape of Outstanding Historic Interest in Wales, with particular emphasis on achieving a smooth transition from the urban edge to the open countryside’.

It is considered by officers that installation of the camera column would constitute an incongruous feature in the landscape, by virtue of its unsympathetic scale, siting and design, and serve to degrade an approach to the city, which has recently benefitted from sensitive and well-considered design (Oriel-y-Parc) across the highway.

The SPG further identifies the ‘increased inappropriate standardisation of products and specifications in the public realm’ and ‘increased use of homogenous products, materials and design’ within St. Davids, which is to be discouraged in new development. Within the application, the installations are described by the applicant as ‘of a standard specification’, which the Authority’s Conservation Officer considers ‘more befitting to a conventional urban carpark’. On the basis of poor design and inappropriate scale and detail, the proposed development is not considered to comply with criterion (b) of Policy 8, criteria (a), (b) and (d) of Policy 15 or criterion (a) or Policy 29 of the LDP.

Access and Parking:
The Authority’s adopted Supplementary Planning Guidance (SPG) on the St. David’s Conservation Area (2011) has highlighted that ‘Traffic Management systems are currently insufficient in St. Davids, and ways to implement more successful enforcement of parking should be found’. However, installation of ANPR camera equipment is not identified as one of the appropriate solutions to addressing this requirement. Officers consider that an alternative means of traffic management for the site can be found, which is more sensitive to the historic context of the setting.

In consultation with the Highway Authority, no objection has been raised to the proposal, subject to submission of detailed plans indicating layout of parking spaces at the site, including provision of 2 no. disabled bays. Condition could be placed upon any permissions requiring provision of this further information. Further recommendation has been made that installations should not be erected in a position that would cause obstruction to vehicles manoeuvring on the site.

As such, the proposed development is considered to comply with Policy 53 (Impacts on Traffic) of the LDP, but does not accord with the recommendations of Supplementary Planning Guidance on the St. David’s Conservation Area (2011).

Landscaping:
No Tree Preservation Orders are present on the site. However, the belt of sycamores to the eastern boundary of the site are identified as important to the setting of the conservation area, and should not be affected as a result of the works. No alterations to vegetation or landscape features are proposed as part of the scheme.

Biodiversity:
PPW, TAN5 and LDP policy 11 requires biodiversity and landscape considerations to be taken into account in determining individual applications. The presence of a

Pembrokeshire Coast National Park Authority
Development Management Committee – 5th December 2018
species protected under UK or European legislation is a material consideration when dealing with applications that are likely to result in disturbance or harm to the species or its habitat.

The PCNPA Ecologist has been consulted on the scheme and no adverse comments have been received in respect of the proposed development. As such, the proposal conforms with the relevant requirements of PPW, TAN5 and LDP policy 11.

Historic Landscape:
In consultation with the Authority’s Conservation Officer, objection has been raised to the scheme on the following grounds:

Setting of Listed Buildings: ‘The proposed ANPR - a bulky 5 metre standard with a prominent terminal - to the immediate fore of the hotel has a high impact on the setting of the listed building in terms of scale, design and siting. It will prominently ‘read’ with the building when viewed from the road, the apparatus more typical of a conventional urban car park than the environs of a listed hotel’.

Conservation Area: ‘The proposed ANPR not only impacts on the setting of the listed buildings, but also on the character and appearance of St David’s Conservation Area, as well as its setting, adding an intrusive and alien element within the entry point of the conservation area and city centre’.

The St. David's Conservation Area SPG (2011) states that opportunity exists to rationalise the loss of identity which the City zone has suffered, through introduction of more sensitively considered street furniture and traffic management elements, which would seek to balance ‘intrusive poles and…inappropriate standardized designs’ which have been installed within the area. Similarly, opportunity is identified to improve ‘main approaches to the City (from inappropriate standardised detailing and signage)’. It is considered that this development would contradict the SGP’s historic environment recommendations on these two matters, and does not make a positive contribution to this approach to the conservation area.

Other Matters:
Information provided: ‘Technical Advice Note (TAN) 24: The Historic Environment (2017)’ states (para 1.26) that ‘applicants must provide sufficient information to allow assessment of their proposals on listed buildings and their settings’.

It should be noted that the heritage statement supplied with this application refers to policy from the NPPF which applies to England only, and is not adopted policy in Wales.

Officers consider that the heritage statement fails to adequately consider the impact of the development on the setting of 2 no. listed structures, stating that:

‘The proposals adopt a sensitive approach to the listed building and are based on an appreciation of the significance of this designated heritage asset…the required infrastructure is minor in nature and as such will not alter the special interest or significance of the building’.

Pembrokeshire Coast National Park Authority
Development Management Committee – 5th December 2018
‘The proposed development will have a minimal impact on the local landscape
character and no landscape elements would be lost as a result of the
construction and installation of an ANPR car park management system. As
the site is an existing car park, the new infrastructure will be installed in an
area that already incorporates similar style features’.

Officers note that only 1 no. listed asset has been considered in the information
provided (only the hotel, not the walled garden), and that attention has not given to
the impact of the development on the conservation area or wider protected
landscape of the National Park. In this regard, the information provided with the
application is considered insufficient and does not comply with TAN 24 (2017).

Conclusion

The principle of installation of some form of car park management system at the site
is acceptable in principle. However, due to the sensitive location of the development,
any installations should be discretely and sensitively designed to preserve or
enhance the setting of 2 no. listed assets and should make a positive contribution at
this gateway to the conservation area. The scale, utilitarian design and positioning of
the proposed installation is not considered acceptable and does not comply with
Character Assessment Supplementary Planning Guidance (2011), St. David’s
Conservation Area Supplementary Planning Guidance (2011), Technical Advice
Note 24: The Historic Environment (2017), or policies 8, 15, 29 or 30 of the LDP.

Recommendation

REFUSE, for the following reason(s)

1. The proposed development by reason of its prominent siting and proximity to
Grove Hotel and Walled Garden, which are a grade II listed structures, would
have a detrimental impact upon the character and appearance of the
conservation area and the setting of the grade II listed buildings. Therefore
the proposed development is considered to be contrary to Character
Assessment Supplementary Planning Guidance (2011), St. David’s
Conservation Area Supplementary Planning Guidance (2011), Technical
Advice Note 24: The Historic Environment (2017), and policies 8, 15, 29 and
30 of the Pembrokeshire Coast National Park adopted Local Development
Plan, in that it is insensitively and unsympathetically designed and sited within
the landscape.
Notes:
1. Contractors to check dimensions and notify any discrepancies or errors to the company immediately.
2. Work to figured dimensions only and to be checked before commencement of work on site.
3. Do not scale off this drawing.
4. All dimensions in millimeters unless otherwise stated.

Legend:
- Location Plan
- Site Plan

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Email: ops.civil@parkingeeye.co.uk

Client: ParkingEye Ltd

Project: The Grove Hotel

Title: Location Plan

Purpose: Information

Scale: 1:1250

Drawn: C-22064-001

Date: 30/05/2018

Rev: A
Notes:
1. Contractors to check dimensions and notify any discrepancies or errors to the company immediately.
2. Work to figured dimensions only and to be checked before commencement of work on site.
3. Do not scale off this drawing.
4. All dimensions in millimetres unless otherwise stated.
5. For further details of external cabinet and base, refer to drawing number C-0000-004.

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**Lighting Column and Camera General Arrangement Detail**

**Column Foundation and Reinstatement Details**

**Table A:**

<table>
<thead>
<tr>
<th>COLUMN HEIGHT (H) (mm)</th>
<th>DEPTH (D) (mm)</th>
<th>G630 GOOD SOIL</th>
<th>G390 AVERAGE SOIL</th>
<th>G230 POOR SOIL</th>
</tr>
</thead>
<tbody>
<tr>
<td>5000</td>
<td>800</td>
<td>1000</td>
<td>1200</td>
<td></td>
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</tbody>
</table>

**Soil Type:** (Factor G) (BS 5649 Part 2)

- **G630 Good:** Compact, well graded sand and gravel, hard clay, well graded fine and coarse sand, decomposed granite rock and soil. Good material should be well drained and in locations where water will not stand.
- **G390 Average:** Compact fine sand, medium clay, compact, well drained sandy loam, loose coarse sand and gravel. Average soils should be drained sufficiently well that water does not stand on surface.
- **G230 Poor:** Soft clay, clay loam, poorly compacted sand, clays containing a large amount of silt and vegetable matter, and made ground. Poor soils will normally be wet and have poor drainage.
Notes:
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