

Application Ref: NP/18/0548/FUL

Case Officer Andrew Richards
Applicant Mr I Wilkinson
Agent Mr J Mansel-Thomas, Pembroke Design Limited
Proposal Partial conversion of public house to a 2 bedroom flat
Site Location Temple Bar, Amroth, Narberth, Pembrokeshire, SA67
8ND
Grid Ref SN16190702
Date Valid 19-Sep-2018 **Target Date** 12-Dec-2018

This application is before committee as the officer recommendation of refusal is contrary to the views of Amroth Community Council.

Consultee Response

Amroth Community Council: Support
PCNPA Tree and Landscape Officer: No adverse comments
PCNPA Planning Ecologist: No comment
PCNPA Park Direction: Policy refusal
PCNPA Access Manager: No objection
PCC Transportation and Environment: Conditional consent
PCC Drainage Engineers: No adverse comments
PCC Coastal Engineer: Concerns
Dwr Cymru Welsh Water: Conditional consent and informative
Natural Resources Wales: No objection and informative

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 responses have 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 06 - Rural Centres
LDP Policy 08 - Special Qualities
LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest
LDP Policy 11 - Protection of Biodiversity
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 21 - Minerals Safeguarding
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity

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LDP Policy 31 - Minimising Waste
LDP Policy 32 - Surface Water Drainage
LDP Policy 34 - Flooding and Coastal Inundation
LDP Policy 35 - Visitor Economy
LDP Policy 44 - Housing
LDP Policy 45 – Affordable housing
LDP Policy 48 - Community Facilities and Infrastructure Requirements
LDP Policy 53 - Impacts on traffic
PPW9 Chapter 03 - Making and Enforcing Planning Decisions
PPW9 Chapter 04 - Planning for Sustainability
PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW9 Chapter 06 - Conserving the Historic Environment
PPW9 Chapter 08 - Transport
PPW9 Chapter 09 - Housing
PPW9 Chapter 11 - Tourism, Sport and Recreation
PPW9 Chapter 12 - Infrastructure and Services
PPW9 Chapter 13 - Minimising and Managing Environmental Risks and Pollution
PPW9 Chapter 14 - Minerals
SPG05 - Sustainable Design
SPG06 - Landscape
SPG08 - Affordable Housing
SPG10 - Safeguarding Mineral Zones
SPG11 - Coal Works - Instability
SPG12 - Parking
SPG20 - Accessibility
SPG22 - Seascape Character
SPG23 - Enabling Sustainable Development in Welsh NPAs
TAN 02 - Planning and Affordable Housing
TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 13 - Tourism
TAN 14 - Coastal Planning
TAN 15 - Development and Flood Risk
TAN 18 - Transport
TAN 23 - Economic Development

Constraints

Special Area of Conservation - within 500m

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Special Protection Area - within 500m
Site of Special Scientific Interest - within 50m
Technical Advice Note 15
LDP Mineral Safeguard
Biodiversity Issue
Rights of Way Inland - within 50m
ROW Coast Path - within 10m
Potential for surface water flooding
LDP Centre:50pc aff housing;30 units/ha
Recreation Character Areas
Low Coal Risk
Surface Coal
Landscape Character Assessment
Seascape Character Assessment

Officer's Appraisal

The application site is a two storey building of relatively modern appearance located in a prominent location overlooking Amroth beach towards Carmarthen Bay. The existing building is semi-detached and comprises two existing businesses at ground floor level with Temple Bar and Smugglers Retreat. At first floor level there are two residential accommodation units which are accessed from the rear of the building via a separate stairwell.

- NP/607/74 – 2 No storm porches – Approved 19.02.1975
- NP/660/78 – External staircase – Approved 19.12.1978

Current Proposal

Planning approval is sought for the partial conversion of the existing public house known as Temple Bar into a 2 bedroom ground floor residential unit. The new unit will be located at the rear of the existing building and have an access off the rear car park area.

Key Issues

The application raises the following planning matters:-

- Policy
- Visual Amenity and Special Qualities of the National Park
- Siting and Sustainable Design
- Amenity and Privacy
- Affordable Housing
- Highway Safety and Access
- Landscaping
- Biodiversity
- Land Stability
- Flooding

Policy:

The property is located within the Rural Centre of Amroth, as defined in the Local Development Plan. The priorities for the rural centres are to aim to meet housing needs, particularly affordable housing needs, to encourage small scale employment and enhance the range of facilities.

The property is currently a public house, with residential accommodation on the first floor. The proposal seeks to reduce the area of the property operating as a public house and incorporate an additional self-contained flat.

Visual Amenity and Special Qualities of the National Park:

The site is large in size, and the footprint of the building largely fills the centre of the plot with a beer garden to the front and a shared parking area to the rear. There are buildings either side of the host site, with the main road to the front. The building is plain and modern but reflects traditional proportions, and has a low walled courtyard to the front elevation. This site is set back due to the front beer garden but remains prominent in the wider street scene, where the character is densely developed frontage.

In the Authority's supplementary planning guidance on Landscape Character Assessment, the site falls within the LCA 1 – Saundersfoot Settled Coast, which comprises small villages set amongst wood areas along several small valleys with streams flowing to the coast. The special quality of this landscape has a strong connection to the coastline.

The proposed scheme will incorporate a new residential dwelling totally within the rear of the existing building. Therefore, the proposal will not have any greater visual impact on the surrounding landscape than that currently provided. As such, it is considered that the proposal is acceptable in design and appearance, and would be in accordance with the requirements of Policies 8, 15, 29 and 30, as the development would be an acceptable element of the built form of the existing village.

Siting and Sustainable Design:

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these special qualities will be protected and enhanced. Policy 15 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria 'a', 'b' and 'd' resisting development that would cause significant visual intrusion, be insensitively and unsympathetically sited within the landscape, and/or fail to harmonise with, or enhance the landform and landscape character of the National Park. Policy 29 of the LDP requires all development proposals to be well designed in terms of place and local distinctiveness (criterion 'a'). The current proposal is considered to be acceptable in terms of siting and sustainable design.

Amenity and Privacy:

Policy 30 of the LDP states that development will not be permitted where it has an unacceptable impact on amenity. The proposed additional residential unit would be

considered compatible and appropriate to the existing mixed use of the application site. The proposal is introducing a residential use alongside a public bar/restaurant and there is therefore potential for amenity conflict both through noise and odour. In this instance, however the residential accommodation is intended to provide living accommodation for the business manager which will negate the potential for conflict. A condition would be required to ensure control the occupancy of the additional accommodation.

The proposed development is contained within the existing building and other than intensification of the use of the property, it is not considered to have any greater impact on the amenity or privacy of neighbouring properties.

Affordable Housing:

The applicant has indicated that the accommodation is for a business manager and an occupancy condition will be used to ensure this. Affordable housing contributions are not sought on residential accommodation which is subject to occupancy controls.

Highway and Safety Access:

The proposal will retain the existing vehicular and pedestrian access points to the site and the building. A new pedestrian access will also be created off the rear carpark to the proposed residential unit. Pembrokeshire County Council Transportation and Environment section has been consulted and support the proposed scheme subject to a condition relating to off-street parking facilities being made available prior to first occupation of the residential unit.

Landscaping:

The existing site currently has no soft landscaping and is mostly hard landscaped to the front beer garden area and rear car park area. The current proposal does not include any new hard or soft landscaping features. As such, no further consideration is considered necessary in this instance.

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 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 Authority's Ecologist has not raised any adverse comments on the application. Natural Resources Wales also do not raise any concerns in this instance. As such, the proposal conforms with the relevant requirements of PPW, TAN5 and LDP policy 11.

Land Stability:

The site is located within an area defined by The Coal Authority as containing potential hazards arising from coal mining. The current application is not considered to require a Coal Mining Risk assessment as land instability from former workings

will be considered under other legislation. In this respect an informative would be added to any permission issued to advise the applicant.

Flooding:

The property is adjacent to a C2 flood zone, as defined by Natural Resources Wales Development Advice Maps. Policy 34 of the Local Development Plan directs development away from those areas which are at risk from flooding now or as predicted for the future by the Development Advice Maps or Shoreline Management Plans. Amroth is within Policy unit 16.2 of the South of Wales Shoreline Management Plan which advises that the village will suffer increasing risk of flooding, with eventual failure of defences in the medium or long-term. A letter circulated to all planning authorities by the Welsh Government in January 2015 reinforces the need to consider Shoreline Management Plans in development proposals.

Paragraph A1.5 of Technical Advice Note 15: Flooding identifies that a proposed development must provide a safe and secure living and/or working environment throughout its life and that an assessment should include a flood event which has a 0.1% (1 in 1000 chance) probability of occurrence in any one year. Natural Resources Wales advise that the lifetime development for residential development is 100 years and for other development is 75 years. This proposal relates to the conversion of part of an existing property and therefore some of the expected lifespan of the lifetime of the property will have already been expended. The property is currently outside but adjacent to the identified C2 flood zone, but the advice contained in the Shoreline Management Plan clearly indicates that the threat of flooding will increase – with eventual failure of defences in the medium or long-term which is a period of 50 to 100 years within Shoreline Management Plan timescales. Thus, even in the next 50 years there is a significantly increased risk of flooding as a result of predicted sea-level rise and climate change, which includes increased storminess.

The proposal is to increase the amount of residential accommodation within the property. This is wholly contrary to national planning policy which states that highly vulnerable development (residential uses) should not be permitted in a C2 zone. The flooding in this instance arises from both the nearby stream and coastal flooding. Even with high levels of adaptation to the property to try to prevent ingress of water, the risk from flooding to the property still increases in the future. Whilst adaptation and increases in floor heights may address fluvial flooding issues for a period of time, coastal flooding as a result of loss of the local defences is likely to be less predictable, more damaging and less easy to mitigate against.

The proposal to intensify highly vulnerable development within the property is therefore contrary to TAN15 and Policy 34 of the Local Development Plan.

Some coastal communities are facing a period of significant change and the growing cost of protecting the status quo against an ever increasing threat is unsustainable. The Welsh Government's overall strategy is to reduce flood risk within our communities over time, taking into account the need to reduce the risk to assets as well as life. Coastal communities need help to plan for their futures over several

decades and it is important that the planning system is engaged in this process now and throughout. It is crucial to recognise that even small-scale changes, such as this proposal, can incrementally work against that strategy.

Natural Resources Wales has advised that they would not be in favour of intensification of a highly vulnerable development within a flood zone, in line with national planning policy. Pembrokeshire County Council's Coastal Engineer advises that whilst the proposed floor scheme raises the proposed residential unit 1.1m above the external car park level and is therefore clear of the current flood risk area. This assumes that the Development Advice Maps published by Natural Resources Wales are accurate to within a few centimetres. The mapping indicates that the edge of the flood zone is very close to the edge of the building (eastern and northern elevations). Emergency access appears clear to the front of the building by a path between the Temple Car and Beach Cottage. However the location of the property on the Amroth coastal frontage means that it is exposed to the effects of storms which, towards the end of the century will be overtopping the defences. Shingle will be thrown into the air with a significant risk of personal injury and property damage. Access will therefore be increasingly problematic.

Therefore, the current proposal is not considered to be acceptable as it will be contrary to both national and local planning policy.

Conclusion

It is clear that whilst the proposals would comply with the siting and location on landscaping grounds and would have no additional impact on the character of the building, locality and neighbouring properties, there are significant national and local policy objections to the location of the property adjacent to an existing flood risk zone and the intensification of a highly vulnerable use within that zone. Taking into account the lifespan of the property and the policy for Amroth in the Shoreline Management Plan the potential for flooding will increase over time. Protecting the status quo against an ever increasing threat is unsustainable.

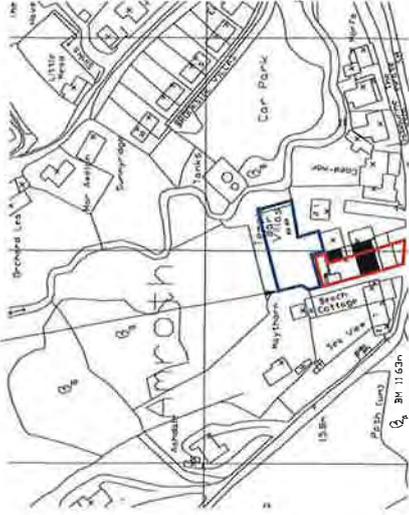
Recommendation

That the application be refused for the following reasons:

1. The application site is adjacent to the boundary of a Flood Zone C2 and proposes residential development which is contrary to advice contained within Welsh Government Planning Policy Wales (paragraph 13.4) and Technical Advice Note 15: Development and Flood Risk, Policy 34 (Flooding and Coastal Inundation) of the Pembrokeshire Coast National Park Local Development Plan (Adopted 2010) and an annex to a letter circulated to Local Planning Authorities in 2014 setting out the instances when development would be acceptable in areas of flood risk and a further letter to Local Planning Authorities in 2015 directing regard to be had to Shoreline Management Plans to align long-term management policies and help avoid inappropriate development. The proposal would be intensifying a highly vulnerable use within an area predicted to be increasingly liable to flooding which is contrary to the national strategy requiring planning authorities to

move away from development which would require flood defences and mitigation of the consequences of flooding in these areas.

SITE REFERRED TO



LOCATION PLAN 1:2500

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The contractor is to check all levels and dimensions and report any variations to the consultants to be reported immediately to the consultants.

Work to figured dimensions

The contractor is expected to supply and do the work in accordance with the details of the drawings and specification, whether referred to in detail or not, without extra payment in respect thereof.

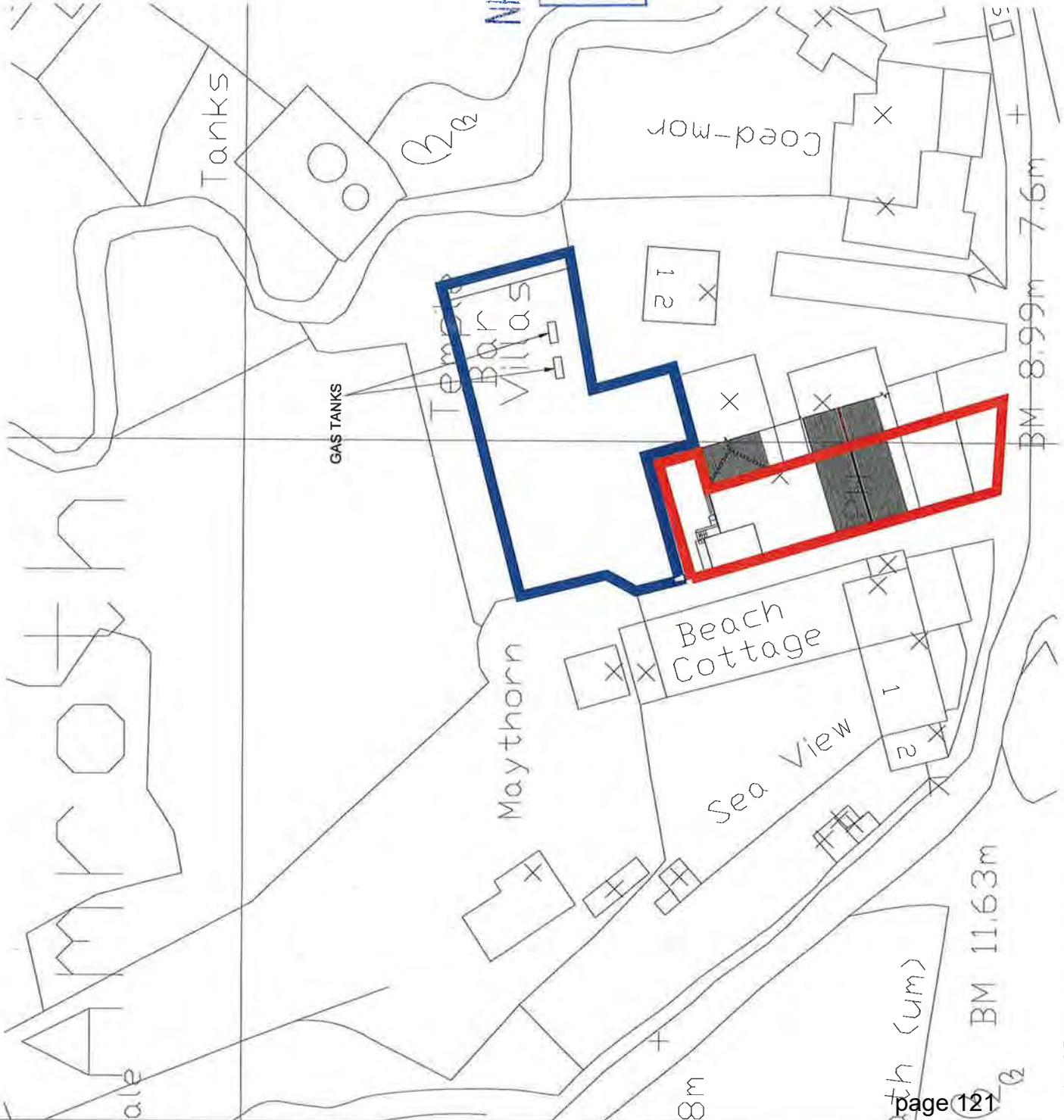
The finished building will require service maintenance in accordance with custom and practice and the manufacturer's recommendations.

The architects drawings are to be read in conjunction with the engineers and all specialist manufacturers / suppliers drawings.



NP 18 5 48

Pembrokeshire Coast National Park Authority
19 SEP 2018
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EXISTING SITE PLAN 1:500

REVISIONS NOTES: DATE REV
 01 Pembroke Design Ltd 2018

Project
SITE AND LOCATION PLAN
ALTERATIONS, THE TEMPLE BAR PUBLIC HOUSE, AMROTH

Client
MFI WILKINSON

PEMBROKE DESIGN
 L I M I T E D

CHARTERED ARCHITECTS
 57 FORD PLACE
 TEL: 01437 781435
 FAX: 01437 884011
 www.pembroke-design.co.uk

CHARITABLE FINANCIAL DEXA
 26 BRIDON STREET
 TEL: 01464 834329
 FAX: 01464 853563
 www.pembroke-design.co.uk

Designed	Scale	Original Size	Job No
DME	VARIOUS	A3	9006
Drawn	Date	Checked by	Draw No / Rev
	APRIL 18	JMT	LP01

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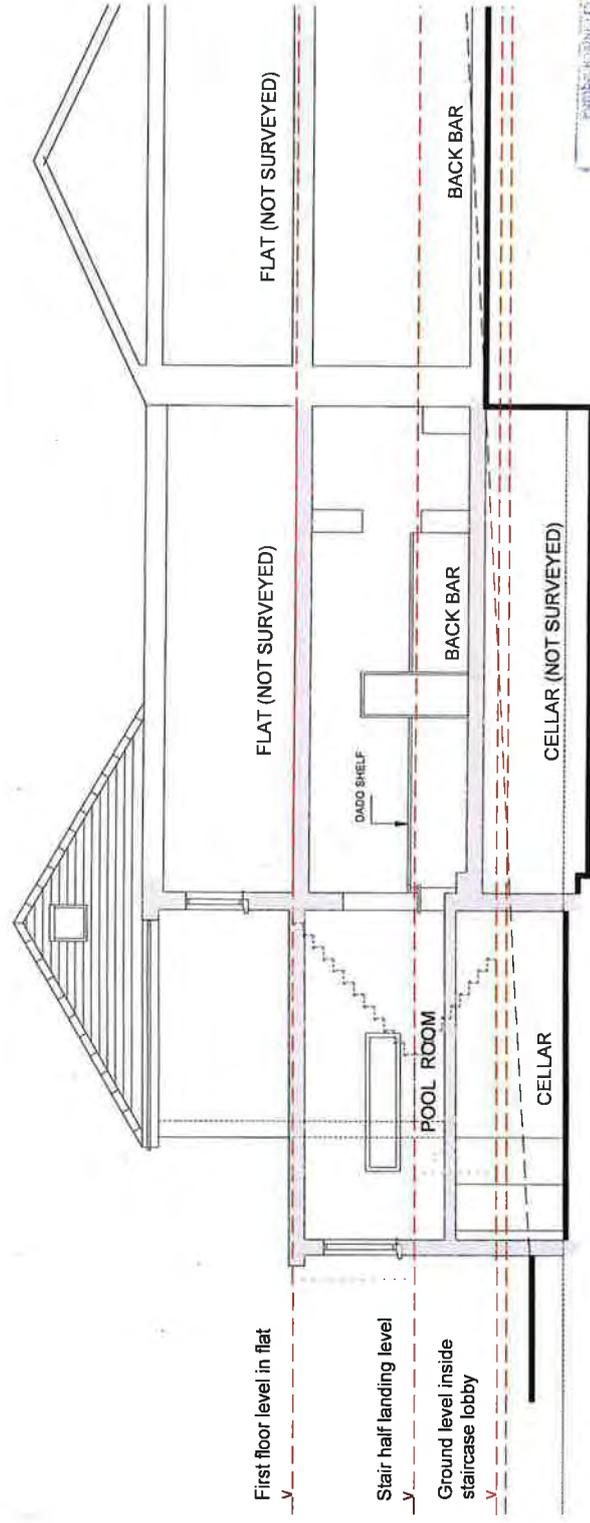
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19 SEP 2018
 Approved Plans
 Arfordir, Penrice

NP 18 5 48
 REVISIONS NOTES
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 DATE REV

Project
EXISTING SECTION

Project
ALTERATIONS, THE TEMPLE BAR PUBLIC HOUSE, AMIROTH

Client
Mr I WILKINSON

PEMBROKE DESIGN
 L I M I T E D

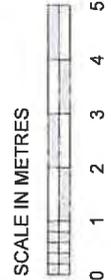
SHARPER ARCHITECTS
 577 PULTON PLACE
 981, 216, 1335
 TEL: 01437 784171
 www.pembroke-design.co.uk

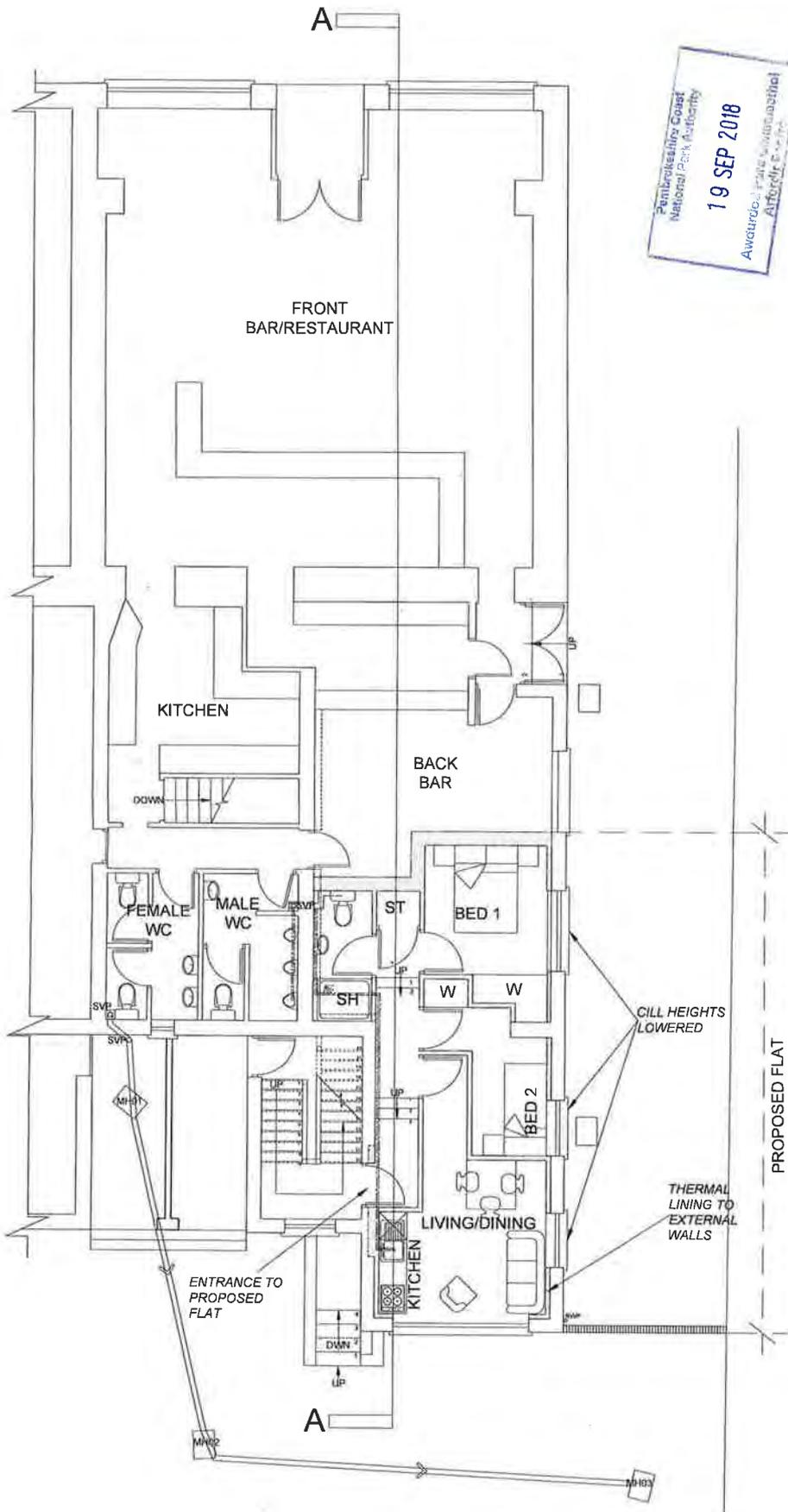
PEMBROKE DESIGN
 16 AVONBROOK ROAD
 507, 801, 1003
 TEL: 01437 784171
 www.pembroke-design.co.uk

CONSTRUCTION SURVEYORS
 25 SPURWAY STREET
 941, 100
 TEL: 01437 784171
 www.pembroke-design.co.uk

Designed	Scale	Original Size	NO
DME	1:100	A3	9003
Drawn	Date	Checked by	Dwg No Rev
	APRIL 18	JMT	E03

EXISTING SECTION A-A





Penwith District Council
 National Park Authority
 19 SEP 2018
 Awdurdod Penwith District Council

NP 18 5 48



NOTE:
 SURFACE WATER DRAINAGE
 REMAINS UNAFFECTED.
 FOUL DRAINAGE TO
 CONNECT TO EXISTING.

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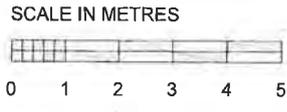
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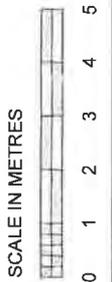
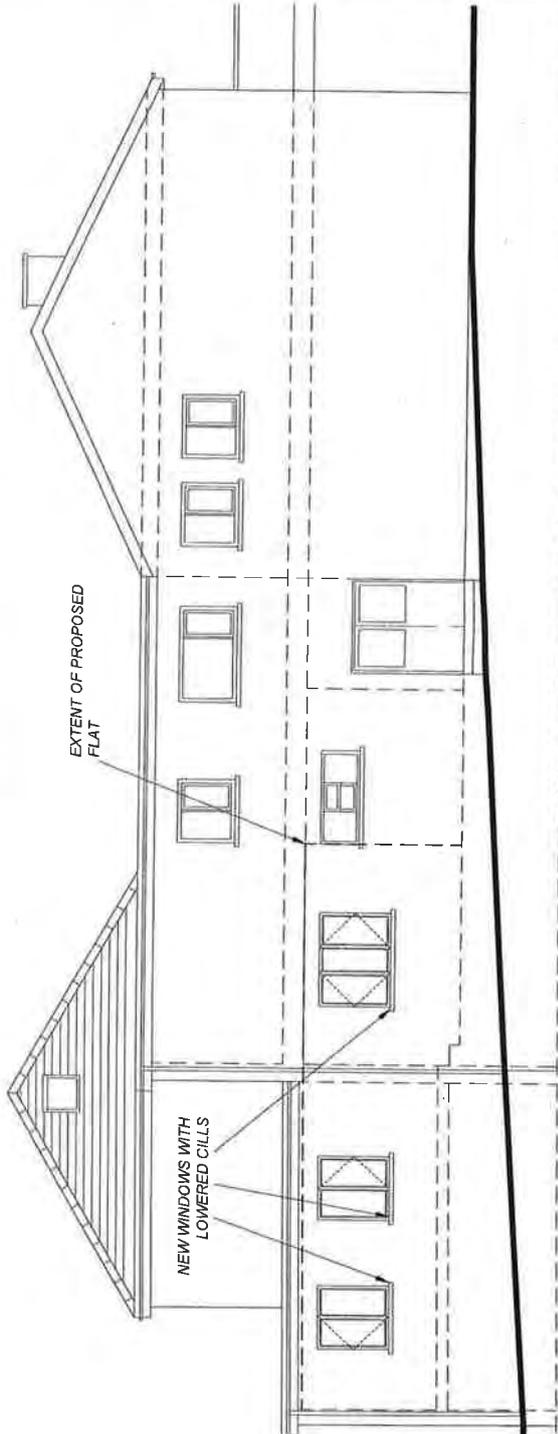
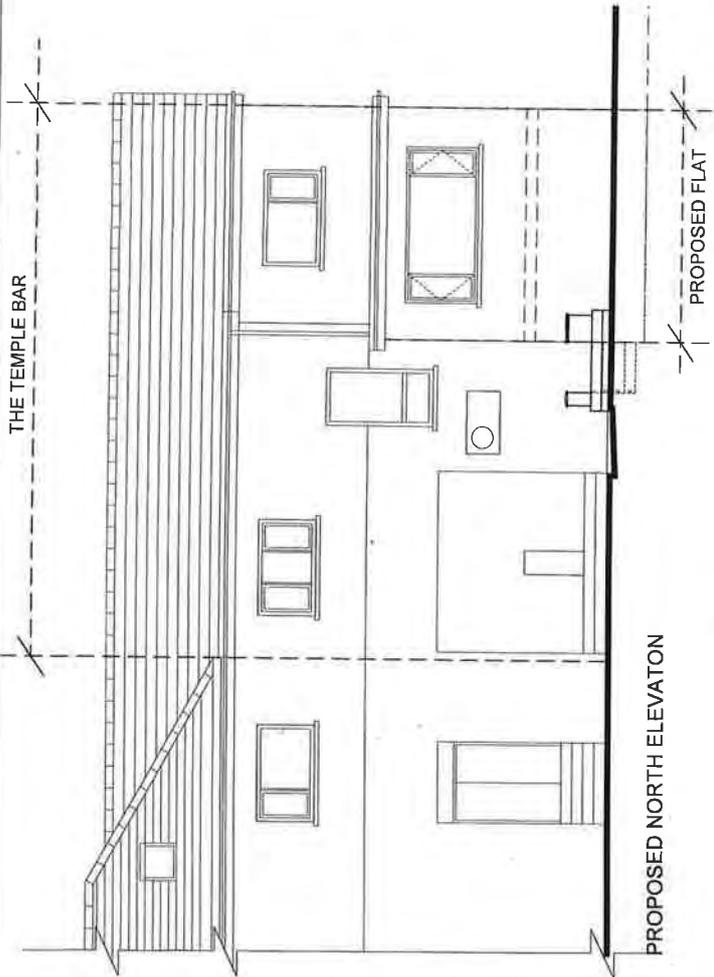
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PROPOSED GROUND FLOOR PLAN 1:100

NOTE: FIRST FLOOR NOT AFFECTED BY PROPOSALS.



REVISIONS NOTES	DATE	REV
© Pembroke Design Ltd 2018		
Drwg PROPOSED GROUND FLOOR PLAN		
Project ALTERATIONS, THE TEMPLE BAR PUBLIC HOUSE, AMROTH		
Client Mr J WILKINSON		
PEMBROKE DESIGN		
L I M I T E D		
● NEWBERRY STREET 5/7 PICTON PLACE SA31 2LE TEL: 01437 764135 FAX: 01437 764471 email@pembrokedesign.co.uk	○ PEMBROKE DOCK 16 WYPOCK STREET SA32 6BT TEL: 01646 861439 FAX: 01646 861953 pdock@pembrokedesign.co.uk	○ DANMARFON 26 SPURWAY STREET SA31 1JG TEL: 01767 233672 FAX: 01767 234717 com@pembrokedesign.co.uk
CHARTERED ARCHITECTS BUILDING SURVEYORS QUANTITY SURVEYORS C.O.R.DINATOR		
Designed JMT	Scale 1:100	Original Size A3
Drawn DME	Date AUG 18	Checked by MT
Job No 9006		Drwg No Rev P01



PROPOSED ELEVATIONS 1:100

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19 SEP 2018

DATE

REV

PROPOSED ELEVATIONS

Project
ALTERATIONS, THE TEMPLE BAR
PUBLIC HOUSE, AMROTH

Client
Mr I WILKINSON

PEMBROKE DESIGN

L I M I T E D

Designed	JMT	Scale	1:100	Original Size	A3
Drawn	DME	Date	AUG18	Checked by	JMT
Job No	9006	Draw No	P02	Rev	

PEMBROKE DESIGN
ARCHITECTS
BUILDING
SURVEYORS
PLANNING
CONSULTANTS
C O M
0-0-0 R B I N A T O P L

5/7 FICOM PLACE
S81 3LE
TEL: 01473 76471
FAX: 01473 76472
www.pembroke-design.co.uk

5/7 FICOM PLACE
S81 3LE
TEL: 01473 76471
FAX: 01473 76472
www.pembroke-design.co.uk

5/7 FICOM PLACE
S81 3LE
TEL: 01473 76471
FAX: 01473 76472
www.pembroke-design.co.uk