

**Application Ref: NP/17/0706/FUL**

<b>Case Officer</b>	Nicola Gandy		
<b>Applicant</b>	Mr G Birt, Five Arches Car Park Ltd		
<b>Agent</b>	Mr J Dwyer, James Dwyer Associates		
<b>Proposal</b>	Change of use of land fronting South Parade (former commercial garage, workshops and car parking) to car parking to enable use of the entire site (including 7 Picton Road) as a permanent car park together with works to the entire site comprising associated pay machines, electric charging points, lighting, signage & planters		
<b>Site Location</b>	Five Arches Car Park, South Parade, Tenby, Pembrokeshire, SA70 7DL		
<b>Grid Ref</b>	SN13320031		
<b>Date Valid</b>	29-Nov-2017	<b>Target Date</b>	23-Jan-2018

The application is referred to the Development Management Committee for determination as the officers recommendation is contrary to the recommendation of the Town Council.

**Consultee Response**

**PCNPA Park Direction:** Objecting

**PCC - Transportation & Environment:** Objecting

**Tenby Civic Society Chairman:** Supporting

**Dwr Cymru Welsh Water:** More information required

**CADW - Protection & Policy:** No objection

**Trunk Road Agency:** No objection

**PCNPA Buildings Conservation Officer:** Conditional Consent

**PCC - Access Officer:** Conditional Consent

**Tenby Town Council:** Approve

**Natural Resources Wales:** No adverse comments

**Dyfed Archaeological Trust:** No adverse comments

**PCC - Drainage Engineers:** No adverse comments

**Public Response**

Neighbour notification letters were posted and a site notice erected in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

One letter of objection has been received and the objections are summarised as follows: -

- Last major site left in Tenby for residential development

- Giving permanent planning would blight the site for years
- During the temporary period given no attempt has been made by the owners to ameliorate the state of the site
- The site could be mistaken for inner city parking lot
- Traffic movements and traffic congestion
- Detrimental impact on park and ride scheme
- Temporary consent should only be considered

### **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 02 - Tenby Local Service and Tourism Centre

LDP Policy 08 - Special Qualities

LDP Policy 09 - Light Pollution

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 29 - Sustainable Design

LDP Policy 30 - Amenity

LDP Policy 31 - Minimising Waste

LDP Policy 32 - Surface Water Drainage

LDP Policy 34 - Flooding and Coastal Inundation

LDP Policy 43 - Protection of Employment Sites and Buildings

LDP Policy 49 - Retail in the National Park

LDP Policy 50 - Town and District Shopping Centres

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW9 Chapter 06 - Conserving the Historic Environment

PPW9 Chapter 07 - Economic Development

PPW9 Chapter 08 - Transport

PPW9 Chapter 10 - Planning for Retailing and Town Centres

PPW9 Chapter 12 - Infrastructure and Services

PPW9 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG05 - Sustainable Design

SPG06 - Landscape

SPG11 - Coal Works - Instability

TAN 05 - Nature Conservation and Planning

TAN 11 - Noise

TAN 12 - Design  
 TAN 15 - Development and Flood Risk  
 TAN 18 - Transport  
 TAN 23 - Economic Development

### **Constraints**

Special Area of Conservation - within 500m  
 Contaminated Land  
 LDP Designation  
 Ancient Monument - within 50m  
 Potential for surface water flooding  
 LDP Centre:60pc aff housing;30 units/ha  
 Recreation Character Areas  
 Landscape Character Assessment  
 Seascape Character Assessment

### **Officer's Appraisal**

#### **Background**

The application site is a large rectangular car park, located on the western flank of South Parade in central Tenby. The car park encompasses the whole width between Picton Road and South Parade, and has operated under a series of temporary planning permissions, beginning in 2011.

The land subject of this application originally housed Tenby Ford Garage - the site was cleared of all but one structure, which remains and provides an attendants office and covered cycle/motorcycle parking area. The site area measures approximately 0.46 hectares in size and the main vehicular access to the site is off South Parade. The car park is bordered by residential and tourist accommodation properties to the south and west, the mixed uses of the town centre are to the east behind the Town Walls, and to the north, more residential properties, and the church and grounds. Tenby's Conservation Area runs along the frontage of the site, and the Town Walls are a Scheduled Ancient Monument and a Grade I Listed Building. The whole of the site lies within the Tenby Retail Centre and Centre Boundary.

#### **Planning History**

- NP/11/122 - Demolition of existing buildings (not office) and use of land as temporary car park (88 spaces) with associated landscaping – Approved under temporary consent for 3 years – 22/09/2011.
- NP/14/0402 - Renewal of temporary permission for use of land as car park with associated pay machines, signage and planters. Approved by Committee, against Officer recommendation, under temporary consent for 3 years – 10/02/2015.

## Current Proposal

This application seeks full planning permission for the change of use of the land (including 7 Picton Road) as a permanent car park, together with works to the site comprising pay and display machines, electric charging points, external lighting, car park signage and landscaping planters.

A total of 102 parking spaces are arranged around the perimeter of the site, with a central row in between. 6 of these are disabled spaces provided to the South Parade end of the site, and there are 2 electric car parking/charging spaces adjacent to the entrance building. Landscaped planters face South Parade and the Town Walls, and planting is also provided along Picton Road together with timber posts to prevent vehicular access and provide pedestrian access only by way of a new ramp and stepped approach.

## Key Issues

- The application raises the following planning matters:-
- Policy
- Impact on the setting of the Conservation Area and the Town Walls
- Highway matters
- Drainage and water environment matters
- Amenity matters
- Landscaping

### *Policy:*

The site is within the Centre boundary for Tenby as defined in the Local Development Plan. It is also within the defined retail centre for Tenby. The land has not been allocated for a particular use but the policy framework in the Local Development Plan would support a variety of uses including retail employment and affordable housing provision. Of key importance to this application is its highways impact and the application of Policies 2, 52 and 53, which seek to improve and promote accessibility and reduce the need to travel by car.

Policy 2 of the Plan sets out the strategy for Tenby which is to aim to meet housing (particularly affordable housing) and employment needs of the town and to protect the town centre with facilities serving the needs of the local area. Proposals should contribute to the protection and enhancement of the town's special qualities and deliver improved traffic management in the town.

This current proposal seeks permanent permission to use a site centrally-located within Tenby for use as a car park. The previous applications for the use of this site as a car park were granted on a temporary basis (3 years) against officer recommendation.

The site was a former garage for retail and repair purposes. It was therefore an employment site. Policy 43 of the LDP seeks to protect against the loss of such sites, unless the present use is inappropriate for the locality, is unviable or there is adequate alternative provision in the vicinity. Under the provisions of Policy 43 the intention is that the site remains in employment use. The current proposal does not meet with these criteria and, as such, is contrary to Policy 43.

A key objective of national planning policy is to reduce the need to travel, especially by car. It is acknowledged in para 8.4.2 of Planning Policy Wales that *‘Car parking provision is a major influence on the choice of means of transport and pattern of development....’*

Further, para 8.4.5 of Planning Policy Wales states:

*“Private non-residential parking is also an important component of parking provision in town centres. Authorities should, where appropriate, seek to encourage appropriate redevelopment of re-use of existing private parking sites to bring the provision down to revised standards, and should refuse planning permission for public and private car parks which do not meet the strategic aims of the development plan and LTP.”*

Policy 52 of the Local Development Plan relates to Sustainable Transport and allows for proposals that assist in delivering improved traffic and parking management but not those which cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated. Policy 53 (Impacts of Traffic) seeks (*inter alia*) to prevent development which would generate an unacceptable impact on congested areas.

There has been a traffic management regime established in Tenby for some time now which relies on removing traffic from the town centre through pedestrianisation and providing park and ride links from peripheral car parks, i.e. The Salterns. This strategy is to the benefit of the whole town, maintaining retail and commercial activity in a central area. It creates a hub for the visitor, protects the historic attraction and makes best use of a finite resource (land).

The site is located within the centre of town and proposals which seek to increase traffic in this area are contrary both to national and local planning policies which are to reduce the need to travel and not to intensify traffic flows in already congested areas. Tenby is also well-served by public transport which should be given priority.

For the above reasons the proposal is considered contrary to national and local planning policies and the traffic and parking management strategy for Tenby.

*Impact on the setting of the Conservation Area and the Town Walls:*

Cadw and the Authority’s conservation officer have assessed the application and have raised no objections.

*Highway matters:*

The original agreement with the landowner in 2011 was to allow a temporary consent for a car park to cover the costs of demolishing the old garage buildings in order to make the site more attractive to developers. Whilst this agreement was not supported by the local highway authority or National Park planning officers as it results in a poorly located oversupply of car parking, the temporary consent was approved, and then renewed in 2014.

The application has not been submitted with any evidence to prove the necessity to provide additional car parking for the town.

PCC Highway Authority carried out a review of the Transport Strategy of the County in 2015 and made the following observations with regard to this application site:-

*'The five arches (Tenby Ford Garage) site on St Florence Parade has a renewed 3 year planning permission for a 94 space car park. The site is earmarked for commercial/residential redevelopment in the Local Development Plan which would aid the regeneration of Tenby.*

*In transportation terms the creation of additional privately owned car parks in the town centre is detrimental because:*

- They encourage more traffic to enter the Town centre with the environmental and congestion costs they entail
- By vehicles parking in the town centre in the summer, rather than the outlying car parks, the viability of Park and Ride is undermined
- Their charging structure is independent of the PCC run nearby Multi Storey car park. When visitors discover the disparity in charging the realisation detracts from the visitor experience
- The redevelopment of land for its intended commercial or residential use has the potential of providing a far greater benefit to the town than the additional car parking, which for a majority of the year will be under used so would be considered an inefficient use of land.

*It is proposed that any future planning permission or renewal is considered in the light of these factors, with private car parking proposals being resisted where they result in a detrimental impact on traffic control, highway safety and parking management in the town and are deterring from efforts of influence travel choice away from the car or result in efficient use of land.'*

Furthermore Policy 52 of the LDP aims to improve and promote accessibility and reduce the need to travel by car. This is to be achieved by permitting proposals that assist in delivering improved traffic and parking management, but not permitting proposals that cause significant concerns about potential transport impacts which cannot be satisfactorily mitigated. This application is considered contrary to Policy 52 of the LDP and also conflicts with the current and future traffic management proposals for Tenby.

The following car parks are currently available all year round in Tenby:

- The Multi-Storey
- South Beach
- North Beach
- The Green

The combination of these car parks with on-street parking and other private off street parking options adequately caters for existing demand outside of the peak summer tourism period and allows sufficient redundancy to allow increased demand for demand growth.

During the summer periods of July and August, South Beach car park will fill early during times of good weather whilst the Multi Storey and North Beach will run near capacity however these car parks do experience a reasonable turnover of users. The instances of the multi storey being full are rare, no more than 2 days in 2017 and the same in 2016. During these times drivers are diverted to The Green and the Salterns seasonal car parks where the Park & Ride can be used. At no time has the Salterns ever been full.

The multi storey car park is signed for motorists and the road layout in the vicinity of the application site means that people will be directed away from the application site around to the multi-storey. To reach the application site, should the multi storey be full, would necessitate a journey back to The Green, up Greenhill Road and long South Parade. The provision of a car park in this location will undoubtedly increase the amount of traffic circulating in the area which again is contrary to proposals to reduce traffic in the town and will not serve to promote a quality pedestrian environment, particularly at times of high tourist attraction.

Due to the available existing car park capacity for a majority of the year in Tenby, any increase in parking provision is likely to result in increased redundancy for most of the year. Should future demand exceed existing capacity, the Local Transport Plan identifies a further Park and Ride scheme serving Tenby which would be consistent with plans to reduce traffic in Tenby, however, any such proposal would be undermined by permanent parking at the Fives Arches car park.

The applicant has suggested that the proposed car park is better located for disabled drivers, however during the Tenby Pedestrian period the parking bays along the town wall are converted to disabled bays to compensate for the loss of the bays within the town walls. These combined with other on street and off street disabled bays provide a good range of disabled parking options. PCC Highway Authority advise that despite the existence of the 5 Arches car park, the main complaint received from disabled drivers is the lack of access to the pedestrianised area of Tenby, therefore this site does not and cannot solve the main issue reported to PCC by disabled drivers.

Accordingly, the proposed development is considered contrary to both national and local planning policy. There is no justification for a permanent car park and the proposal does little for the town or its traffic management.

*Drainage and water environment matters:*

PCC Drainage Engineers have responded stating that the current proposal for the renewal of the temporary permission would not alter the current surface water drainage regime and do not object to the proposal. Natural Resources Wales do not object to the current proposal.

*Amenity matters:*

The proposal is not considered to have great impact on the immediate amenity of neighbours. In the wider amenity considerations this proposal will generate an unnecessary flow of traffic around the town 'cruising' for car parking spaces. This detracts from the pedestrians and users experience of the whole of Tenby. It will contribute and exacerbate the towns traffic congestion.

*Landscaping:*

It is considered that any additional planting would provide additional screening to the car park from the surrounding street scape and would provide benefits to the site's character and the street scape. However, it is noted that the opportunity for any additional planting would be limited to the existing planters located around the site as there are extensive areas of hard landscaping which are required for the car park

access and parking spaces., This would therefore limited the size and species on any additional proposed planting.

## **Conclusion**

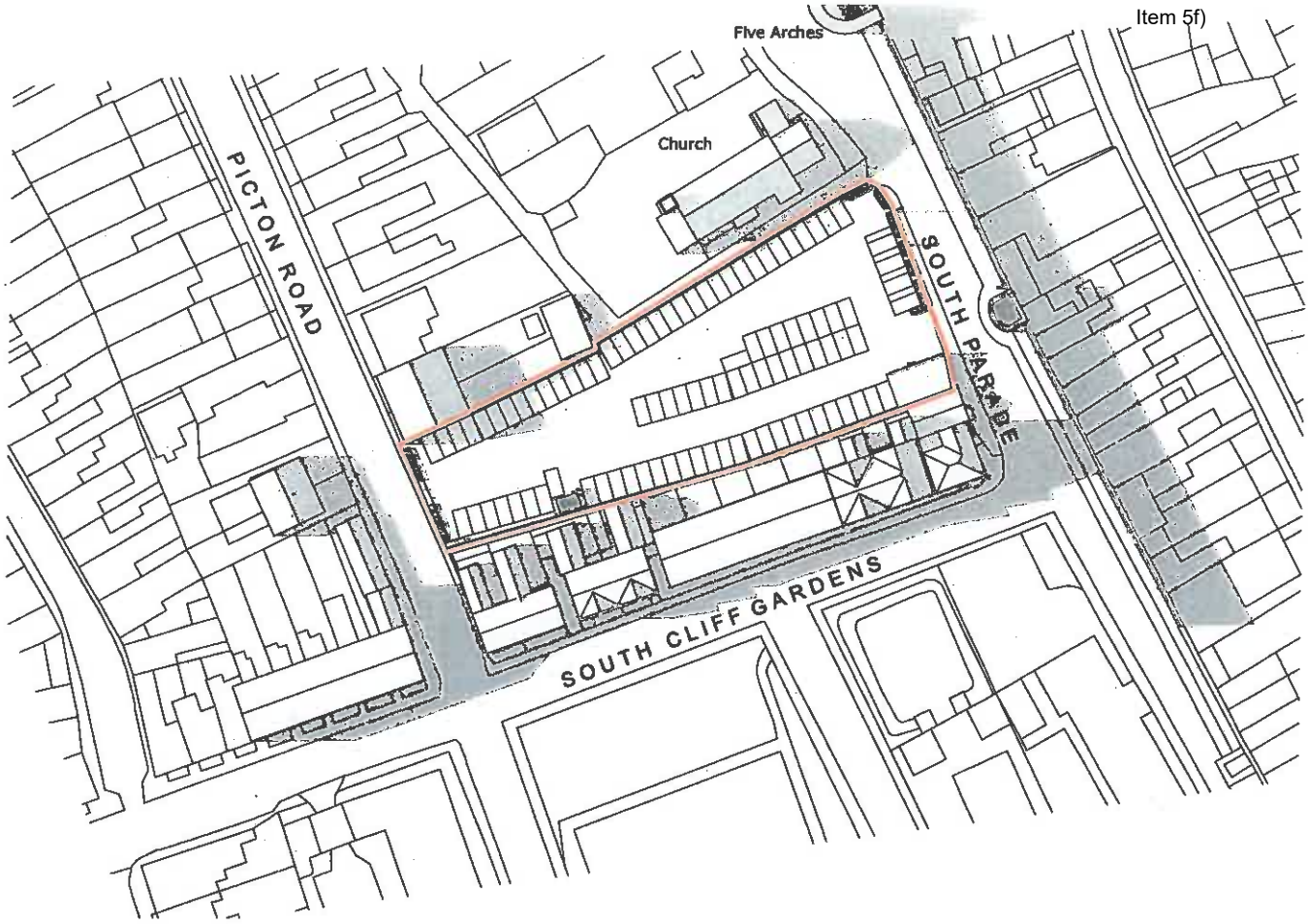
Whilst the views of the Town Council are noted, at no time has a need for an additional car park been demonstrated with evidence of a shortage of car parking in Tenby. The continued use of this car park would result in inefficient use of otherwise developable land, and the additional traffic being drawn into Tenby creating traffic management issue would be contrary to the process of removing inappropriate parking and trips to/from Tenby. As such, the proposed scheme for the permanent use of the site for car parking is considered to be contrary to national and local planning policy and also the Regional Transport Plan and cannot be supported.

## **Recommendation**

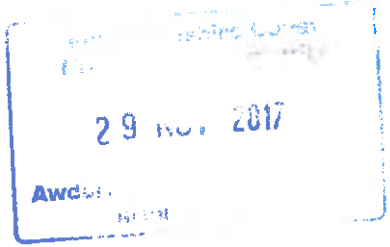
That the application be refused for the following reasons:-

1. The application results in traffic being brought into the Tenby town centre where traffic congestion is already considered an issue and pedestrian activity is high during peak holiday seasons when the car park is likely to receive most of its use. As such the proposal is contrary to Policies 2 – Tenby Local Service and Tourism Centre (Tier 2) (Strategy Policy), 52 – Sustainable Transport and 53 - Impacts of Traffic of the Adopted Pembrokeshire Coast National Park Local Development Plan (September 2010) and Planning Policy Wales Edition 9 (November 2016) Chapter 8 – Transport which is seeking to reduce traffic congestion.
2. Adequate car parking is currently available in and around Tenby so additional car parking will result in significant underuse of existing car parking spaces out of season. Provision of the car park will not provide short stay parking facilities in close proximity to the Town Centre and would conflict and undermines the aims of the Regional Transport Plan and Policy 52 – Sustainable Transport of the Adopted Pembrokeshire Coast National Park Local Development Plan (September 2010) and Planning Policy Wales Edition 9 (November 2016) Chapter 8 – Transport
3. The site is recognised as an employment site and if the loss of this site can be justified for this proposal then a community use or affordable housing provision will be given priority. The current proposal does not meet with these criteria and therefore is contrary to Policy 43 – Protection of Employment Sites and Buildings of the Adopted Pembrokeshire Coast National Park Local Development Plan (September 2010)
4. The application provides no substantive evidence regarding the need for additional car parking spaces within Tenby. The application also makes no provision for more sustainable forms of parking in terms of coach parking and which would make more effective use of this land. As such the proposal is contrary to Policy 53 - Impacts of Traffic of the Adopted Pembrokeshire Coast National Park Local Development Plan (September 2010)





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NP 17 7 06

— Site boundary

LOCATION PLAN scale 1:1250

Five Arches Car Park Tenby Pembrokeshire

Ref 665

**JAMES DWYER ASSOCIATES**

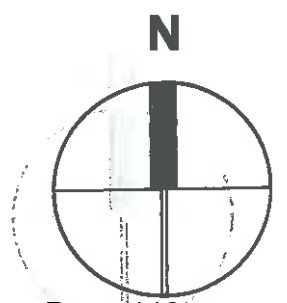
**Architecture & Town Planning**

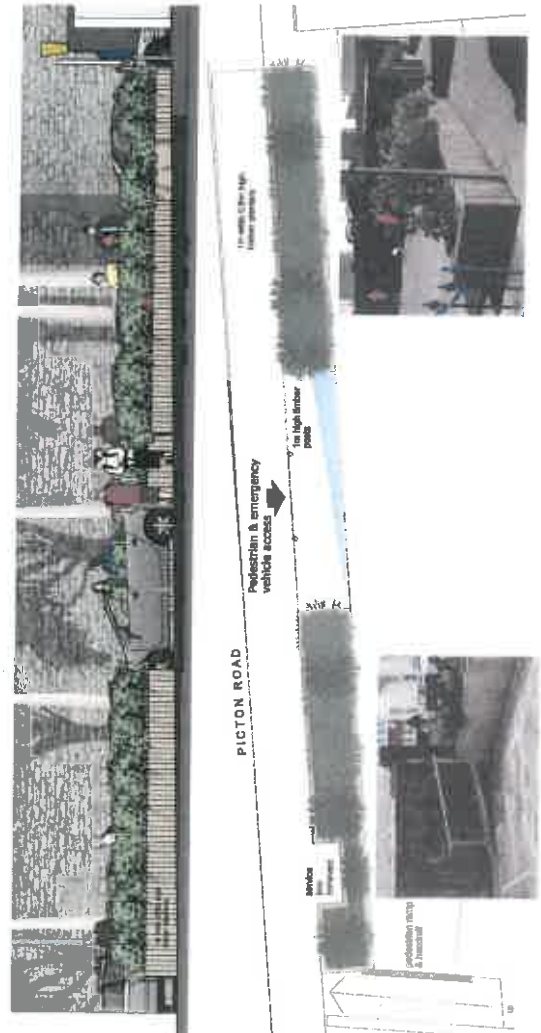
22 Swallowdale  
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telephone: 0207 1934016

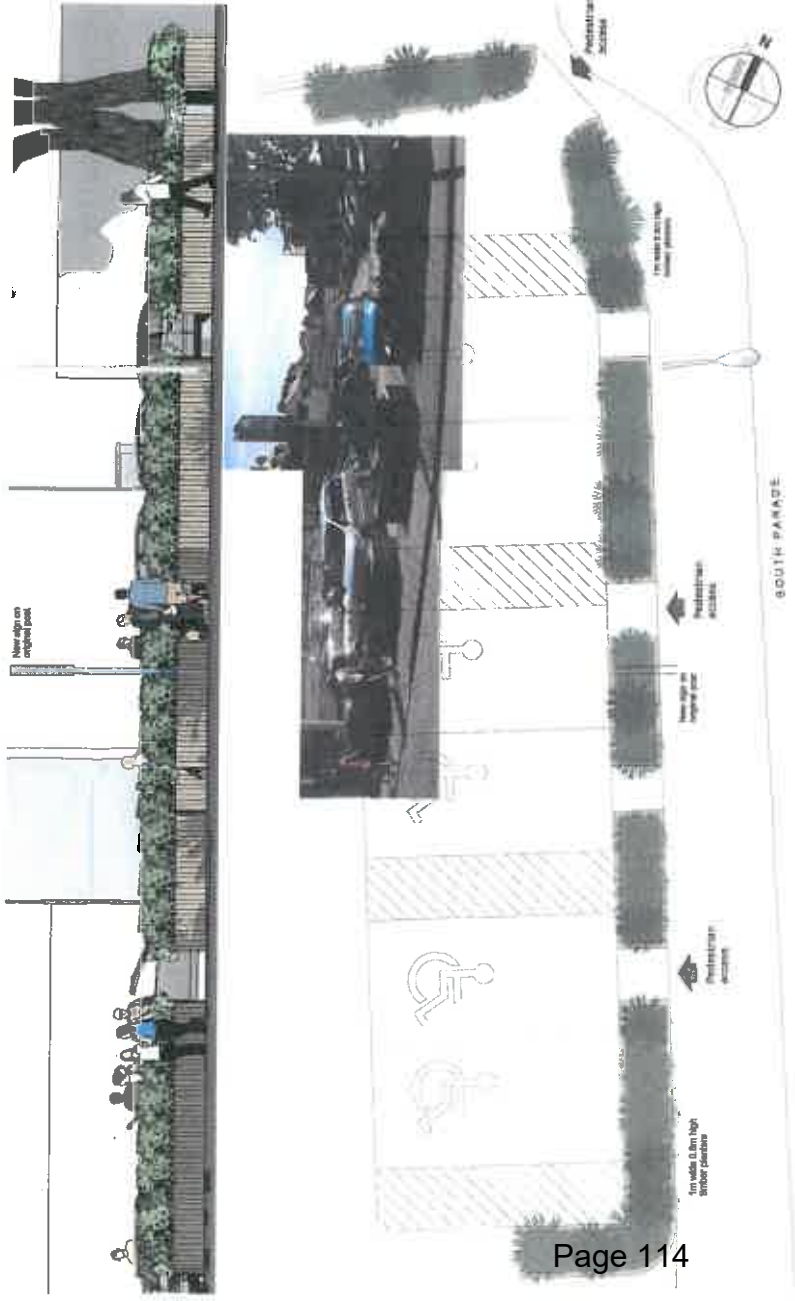
e-mail: james.dwyer@uwclub.net

Architectural practice registered with Chartered Institute of Architectural Technologists





PLAN & ELEVATION OF PLANTERS & PEDESTRIAN RAMP AT PICTON ROAD



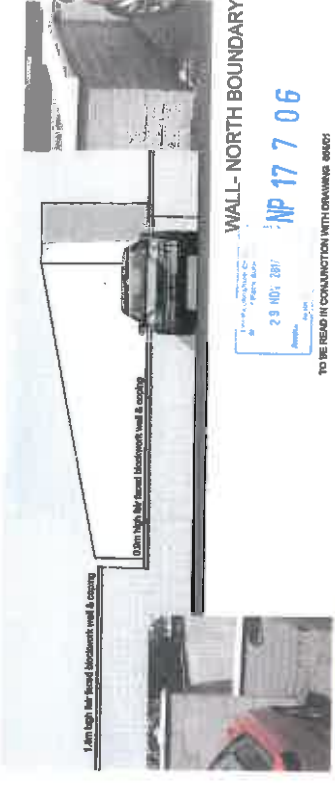
PLAN & ELEVATIONS OF PLANTERS AT SOUTH PARADE



FACIA & POST SIGNS, PAY MACHINE, TARRIF SIGN, LIGHTING, CHARGING POINT, MOTERBIKE & BICYCLE PARKING



PAY MACHINE, TARRIF SIGN, SUBSTATION STANCHIONS & LIGHTING



WALL - NORTH BOUNDARY

TO BE RESUBMITTED IN CONNECTION WITH DRAWING: 23 103 287  
 23 103 287  
 NP 17 7 06

THIS DRAWING IS TO BE SUBMITTED IN THE MANNER SPECIFIED IN THE CONTRACT DOCUMENTS.

**JAMES DMYER ASSOCIATES**  
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Architectural practice registered with Chartered Institute of Architectural Technicians  
 Five Arches Car Park South Parade Tenby  
 Five Arches Car Park Ltd  
 Car park with associated pay machines, electric charging points, signage, lighting & planters

Details

Project No: 665 / 04  
 Drawing No: 1-90  
 Scale: 1:50  
 Date: 06 Oct 2017  
 Checked by: JD  
 All dimensions to be indicated on this plan to correspond to the actual work. Check this drawing in the light of the contract documents. This drawing is a contract document. It is the responsibility of the client to ensure that the contract documents are complete and correct. This drawing is a contract document.

Item 5f)



TO BE READ IN CONJUNCTION WITH DRAWING NUMBER 17 06

James Dwyer Associates  
 Architecture  
 Town Planning  
 Project Management  
 Party Wall Surveying

Architectural practice registered with Chartered Institute of Architectural Technicians

Five Arches Car Park South Parade Tenby  
 Five Arches Car Park Ltd

Car park with associated pay machines, electric charging points, signage, lighting & planters  
 plan, elevations & perspective view

Project No: 685 / 03 / 1200  
 Drawing No: 17 06  
 Date: Oct 2017

Prepared by: JB  
 Checked by: JB  
 Drawn by: JB

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Item 5f)

**VIEW FROM FIVE ARCHES**

**NOTES:**  
 1. This elevation shows the proposed car park and associated infrastructure, including the location of the original buildings and surrounding landscape.  
 2. The car park is proposed to be located to the east of the church.  
 3. The car park is proposed to be located to the east of the church.  
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