Application Ref: NP/18/0439/FUL

Case Officer	Andrew Richards		
Applicant	Mr D Beynon, Monkstone Bay Development		
Agent	Mr H Rees		
Proposal	Conversion of existing disused church to 2 residential units of accommodation		
Site Location	Thomas Memorial Congregational Church, High Street, Saundersfoot, Pembrokeshire, SA69 9EJ		
Grid Ref Date Valid	SN13580492 30-Jul-2018	Target Date	11-Jan-2019

This application is before the Development Management committee as Saundersfoot Community Council is in support of the application, contrary to your officer's recommendation to refuse.

Consultee Response

Saundersfoot Community Council: No objection PCNPA Planning Ecologist: No adverse comments subject to informative PCNPA Park Direction: Affordable housing contribution required PCNPA Buildings Conservation Officer: Support PCNPA Access Manager: No objection PCC Transportation and Environment: No objections PCC Drainage Engineers: No adverse comments

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 04 - Saundersfoot Local Centre

LDP Policy 08 - Special Qualities

LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest

LDP Policy 11 - Protection of Biodiversity

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

LDP Policy 31 - Minimising Waste

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LDP Policy 32 - Surface Water Drainage

LDP Policy 44 - Housing

LDP Policy 45 – Affordable housing

LDP Policy 50 - Town and District Shopping Centres

LDP Policy 52 - Sustainable Transport

LDP Policy 53 - Impacts on traffic

PPW10

SPG05 - Sustainable Design

SPG06 - Landscape

SPG08 - Affordable Housing

SPG11 - Coal Works - Instability

SPG12 - Parking

SPG17 - Conservation Area Proposals

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 15 - Development and Flood Risk

TAN 18 - Transport

TAN 24 - The Historic Environment

Constraints

Special Area of Conservation - within 500m Special Protection Area - within 500m LDP Designation Rights of Way Inland - within 50m LDP Centre:60pc aff housing;30 units/ha Recreation Character Areas Surface Coal High Coal Risk Landscape Character Assessment Seascape Character Assessment

Officer's Appraisal

Background and History

The application site is located to the north east of High Street within the village of Saundersfoot and forms part of a continuous Conservation Area frontage and is also part of the retail centre. The site forms part of the historic Thomas Memorial Congregational Chapel and Manse.

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- NP/14/0518 Change of use of Thomas Memorial Chapel to a single dwelling, change of use of part of the ground floor of the Manse from Class A2 to residential. Erection of a dwelling to the rear of the Chapel and partial demolition of The Manse and Chapel to provide off-street parking & associated works – Approved 30.01.2015
- NP/15/0163/DOC Discharge of conditions 3, 4, 5, 6, 9 & 11 of NP/14/0518 Discharged 06.05.2015
- NP/15/0175/DOC Discharge of condition 12 (External illumination) of NP/14/0518 – Discharged 08.04.2015
- NP/16/0032/NMA Non-material amendment to NP/14/0518 Approved 04.04.2017

Current Proposal

This current planning application proposes subdividing the chapel to form two residential units rather than single residential unit granted planning permission under the original application (NP/14/0518). The proposal includes amendments to the fenestration of the existing church structure and some associated external works.

Key Issues

The application raises the following planning matters:-

- Principle of Development and Impact on National Park
- Impact on the Adjacent Listed Buildings
- Affordable Housing
- Impact on the Conservation Area
- Siting and Sustainable Design
- Amenity and Privacy
- Highway Safety and Access
- Biodiversity
- Land Stability
- Land Drainage and Flooding

Principle of Development and Impact on National Park:

The site lies within the local centre of Saundersfoot as defined within the Local Development Plan (LDP) and the proposal for sub-division of the chapel into two dwellings is considered to be acceptable in principle. The proposed development scheme also includes some minor changes to the exterior of the structure and external works. As such, the proposal is considered to maintain the special qualities of the National Park when viewed from the immediate and wider landscape.

Impact on the Adjacent Listed Buildings:

It is considered that the proposal will not adversely affect the setting of Rose Cottage, which lies within proximity to the site. Essentially, the character of the varied streetscape remains intact and this is critical to the setting of Rose Cottage.

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Affordable Housing:

At the time of submission the applicant was putting forward the view that nothing had changed regarding viability of the development and therefore the PCNPA should not be requiring any affordable housing onsite or any financial contribution towards offsite affordable housing.

The agent submitted information on the costings of making the changes to the chapel only. This viability scheme demonstrated that the subdivision of the unit did not provide sufficient viability to provide any contribution off site.

However, officers are of the view that the viability test should be on the overall scheme of development and not a subdivision of a part of the development site. The site is still in the construction phase and two of the dwellings completed and sold.

There has been considerable discussion and exchange of views on this matter. Officers have apologised for the confusion and have reimbursed the applicant his payment to the Valuation Office for the viability testing. Officers have advised the applicant that the adopted policy calculation required for an off-site provision towards affordable housing would be £13,000. The Director of Planning has agreed that the PCNPA would pay for the new viability testing through the Valuation Office.

The applicant has continued to argue that the scheme is unviable, but has not provided overall figures for the whole development (now 3 net gain residential units) for this view to be objectively tested.

The PCNPA SPG on Affordable Housing originally requested 60% affordable housing onsite provision, but with the technical update in August 2016 the percentage for Saundersfoot developments was revised down to 30%.

Without viability testing data, your officers are of the view that the adopted policy should be applied and until there is clear evidence that it is not viable to provide an affordable housing contribution this remains the relevant policy to be applied.

The average price for property in Saundersfoot stood at £270,533 in April 2019. This is a rise of 0.63% in the last three months (since January 2019) and rise of 3.45% since 12 months ago. In terms of property types, flats in Saundersfoot sold for an average of £179,507 and terraced houses for £249,383. This is according to the current Zoopla estimates. In the previous 5 years Zoopla identifies that 419 sales in Saundersfoot area took place with an average price paid of £234,971 with a current value of £270,533, making a value change of plus £47,204 which results in an increase of 21.1% within 5 years.

For the purposes of the viability testing in 2014 the new build town house (now known at Monkstone House) at the rear of the development site was estimated to provide a sales figure of £375,000. The property was sold in 2018 for £567,000 (£192,000 above estimate). The Manse sales figure estimated a sale figure of £350,000 and had been advertised for £425,000. Officers have no other figures to

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base any viability modelling on as the applicant has to date refused to cooperate and provide the necessary information.

Therefore, given that the current application does not include a mechanism to ensure that an appropriate financial contribution is secured towards affordable housing as required under LDP Policy 45 and the associated SPG this will form a reason for refusal.

Impact on the Conservation Area:

The current proposal is considered to preserve the character and appearance of the Conservation Area. The chapel and its setting remain dominant and recognisable features within the street. As such, the proposal can be supported in respect of the impact on the conservation area.

Siting and Sustainable Design:

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategic 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' and 'b' resisting development that would cause significant visual intrusion and/or, that would be insensitively and unsympathetically sited within the landscape. Criteria 'd' and 'e' resists development that would fail to harmonise with, or enhance the landform and landscape character of the National Park, and/or fail to incorporate important traditional features.

Policy 29 of the LDP requires all development proposals to be 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 siting of the proposed works is considered to be acceptable in this instance. Given the sensitive design approach submitted in respect of the works to the chapel to provide the sub-division which ensures that the proposal retains the character of the building. This aspect together with using suitable materials to provide a sustainable design solution within this sensitive setting is supported by officers.

Amenity and Privacy:

Policies 29 and 30 of the Local Development Plan seek to protect community cohesion and health and to avoid incompatible development that would lead to a significant adverse impact upon amenity. The supporting text at paragraph 4.136 explains that the policy aims *"to protect the amenity enjoyed in people in their residences, workspaces and recreational areas. Amenity is defined as those elements in the appearance and layout of town and countryside which makes for pleasant life rather than mere existence. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable is likely to adversely affect amenity".*

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Policy 30 is a criteria based policy setting out that development will not be permitted where it has an unacceptable impact on amenity particularly where, a) the development is for a use inappropriate for where people live or visit and/or; b) the development is of a scale incompatible with its surroundings; and/or; c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact; and/or; d) the development is visually intrusive.

No adverse comments have been received from the general public or neighbours on the current application, and based on the current proposed scheme of works it is considered that the development will not have any greater impact on the privacy and amenity of neighbours than that previously approved under planning application NP/14/0518.

Highway Safety and Access:

Pembrokeshire County Council Transportation and Environment section has indicated that the existing access into the site via the archway will be retained. This site is located within 'Zone 1' as identified within the Parking Guidelines, where parking is not a requirement within planning terms. As such, no objections are raised on the current proposal.

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 Ecologist has commented on the application stating that the historical bat survey report confirmed that no bats were roosting in 2014 and given the level of disturbance since that report it is unlikely any significant roosts are currently present. As such, it is requested that an informative be added to any consent granted to ensure a precautionary approach is taken during the construction phase, and should any bats be found all works should stop and NRW be contacted immediately. 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. Based on the current application, there is no requirement to provide a Coal Mining Risk assessment as the proposed development is unlikely to impact on former coal workings.

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Land Drainage and Flooding.

PCC Drainage Engineers have been consulted as part of the application process, and do not raise any adverse comments as the proposal would appear to not alter the current surface water drainage regime.

Conclusion

It is clear that whilst the proposals would comply with most of the policies within the adopted LDP and that the siting and design 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 proposed in terms of affordable housing and the required mechanisms to ensure that suitable contributions are secured as part of the planning process.

Recommendation

That members REFUSE application NP/18/0439/FUL due to the following reason:

Conditions/Reasons

1. The application fails to justify the lack of provision of a financial contribution towards affordable housing. The application therefore fails under Local Development Plan Policy 45 (Affordable Housing) and Supplementary Planning Guidance for Affordable Housing (adopted 5th November 2014) and is therefore contrary to guidance contained within Planning Policy Wales (Edition 10, November 2018).

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