

Application Ref: NP/24/0177/FUL
Case Officer: Charlotte Broome
Applicant: N Powell
Agent: Mango Planning and Development Ltd (D Brown)
Proposal: Change of use to residential and replacement of front bay windows
Site Location: Dolphin House & Myrtle Cottage, High Street, Saundersfoot Pembrokeshire, SA69 9EJ

This application is being presented to the Development Management Committee as it is a departure from the Local Development Plan 2, and the recommendation is to grant permission subject to conditions.

Summary

This report recommends approval for change of use from retail to residential for two adjoining properties in Saundersfoot Retail Centre.

The application represents a departure from LDP policy and the resubmission of a previously withdrawn application. This application is supported by adequate marketing evidence showing a lack of commercial demand. It is considered that the change of use to residential will not be detrimental to the retail centre of Saundersfoot, where the application site properties have remained vacant for over 3 years.

Consequently, the proposal will positively contribute to the special qualities of Saundersfoot more broadly. Following consultation, no objections have been received from statutory consultees or from third parties.

The relevant plans and supporting documentation can be found online at [Citizen Portal Planning - application details \(agileapplications.co.uk\)](https://citizenportalplanning-agileapplications.co.uk)

Consultee Response

Saundersfoot Community Council: No response

PCC - Transportation & Environment: No response

PCNPA - Buildings Conservation Officer: No adverse comment

Cadw – Protection & Policy: No representation

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 representation was received.

The application has been advertised as a departure from the Local Development Plan (advert published in the Western Telegraph on the 19th June 2024).

Policies considered

Future Wales: The National Plan 2040
Planning Policy Wales 12 (PPW12)
TAN 05 - Nature Conservation and Planning
TAN 12 - Design
TAN 24 - The Historic Environment

Local Development Plan 2 (Adopted September 2020)

LDP2 Policy 01 - National Park Purposes and Duty
LDP2 Policy 04 – Saundersfoot Local Centre
LDP2 Policy 08 - Special Qualities
LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park
LDP2 Policy 29 - Sustainable Design
LDP2 Policy 30 - Amenity
LDP2 Policy 57 - Town and District Shopping Centres
LDP2 Policy 59 – Sustainable Transport

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

Pembrokeshire Coast National Park Supplementary Planning Guidance:
Landscape
Seascapes
Biodiversity
Conservation Areas
Parking Standards
Sustainable Design & Development

Officer's Appraisal

The adjacent properties known as Dolphin House and Myrtle Cottage are situated within a terrace of buildings on the northern flank of the High Street in Saundersfoot. The application site is situated within the defined Saundersfoot Retail Centre (approximately 30m from the edge of) and is within the Saundersfoot Conservation Area.

The application site comprises two properties which have been converted in the past (1970s/80s) to create an office (use class A2) across the overall ground floor with 2 no. separate residential flats above. The properties have most recently been let on the ground floor as a holiday agency booking office and have remained vacant since 2020. The first storey flats have continued to be occupied for residential use. Historically, the two properties were two separate residential units across both floors. Each property shares a rear garden curtilage laid to lawn.

The neighbouring properties of Brynderi to the west and Thomas Memorial Church to the east are both in residential use. The wider setting comprises principally residential properties on the northern flank of the High Street, where the application

site sits within a row of four residential dwellings. The southern flank comprises a mix of uses including retail, restaurants/takeaways and residential.

The site is within the Saundersfoot Settled Coast Landscape Character Area LCA 1, and Carmarthen Bay West Seascape Character Area SCA 40 as defined in the Authority's respective Landscape and Seascape Supplementary Planning Guidance.

Site and Proposed development

The application proposes the change of use of both properties from A2 booking office use on the ground floor (and holiday let use on the first floor) to 2 no. residential properties. This proposal would comprise a 3-bedroom dwelling at Dolphin House and a 2-bedroom dwelling at Myrtle Cottage.

Due to the existing residential use of 2 no. units above the ground floor, this application proposal would not result in a net gain of the number of residential units but would instead result in two residential units of greater size.

The proposal also includes replacement of the front bay window of Myrtle Cottage.

The proposed development and site are detailed in the accompanying plans and forms.

Relevant Planning History

NP/18/0439/FUL - Thomas Memorial Congregational Church, High Street, Saundersfoot - Conversion of existing disused church to 2 residential units of accommodation. Approved 19th June 2019.

NP/23/0165/FUL - Dolphin House & Myrtle Cottage, High Street, Saundersfoot - Proposed change of use of ground floor holiday booking office to residential. Building to revert back to two full residential cottages & replacement of two ground floor windows to principal front elevation. Withdrawn 13th July 2023. This application was withdrawn following advice that it would be refused, on the basis that the change of use from commercial to residential on the ground floor of a property in the district shopping centre of Saundersfoot would be contrary to LDP policy.

NP/23/0624/FUL - Dolphin House & Myrtle Cottage, High Street, Saundersfoot - Cancelled following PCNPA's request for more comprehensive detail in relation to the marketing of the property. Subsequently, the Authority engaged with the applicant and upon further consideration in light of national policy planning policy regarding residential use in town centres, advised the applicant to resubmit the application.

NP/23/0374/FUL - Brynderi, High Street, Saundersfoot - New dwelling to rear of courtyard, demolition of existing garage stores building, alterations to bay windows to the street elevation, and new slate roof covering. Approved 8th February 2024.

Key Issues

The key issues for consideration are as follows:

- *Policy and Principle of Development*
- *Change of Use from Retail to Residential in the Retail Centre Boundary*
- *Siting, Design and Impact upon the Special Qualities of the National Park*
- *Amenity and Privacy*

Policy and Principle of Development:

Section 38 of The Planning and Compulsory Purchase Act 2004 requires that in determining a planning application the determination must be in accordance with the Development Plan unless material considerations indicate otherwise. The Development Plan for the National Park comprises Future Wales (the National Plan 2040) and the Local Development Plan 2.

Future Wales – The National Plan 2040 (FW), was adopted on 24th February 2021 and is the National Development Framework for Wales, and 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...*

Policy 01 of the Pembrokeshire Coast National Park Local Development Plan (LDP2) sets out the National Park's purposes and duty and is the overarching policy which ensures that development within the National Park is compatible with a) the conservation and enhancement of the natural beauty, wildlife and cultural heritage of the Park, and b) the public understanding and enjoyment of the special qualities. The Sandford Principle asserts primacy to the first purpose - of conservation and enhancement, in cases of obvious conflict.

The development site is located within the Centre boundary and retail area of Saundersfoot, which means that Policies 04 (Saundersfoot Local Centre) and 57 (Town and District Shopping Centres) of the Local Development Plan apply to this proposal subject to considerations set out in Planning Policy Wales and other LDP policies. Policy 04 of the Plan sets out the land use priorities for Saundersfoot and includes providing for or permitting housing to facilitate the delivery of affordable housing needs of the local area; to protect and enhance the district shopping centre and community facilities to meet the needs of the local area and visitors; and to ensure that developments permitted contribute to the protection and enhancement of the village's special qualities.

Given that there would not be a net gain of residential units there is no requirement for an affordable housing contribution.

Due to the reasons set out in the following section, it is considered that the application site plays no sustainable role in protecting and enhancing the district shopping centre and that a continuing, vacant pair of properties do not protect and enhance the village's special qualities. On this basis, the proposal complies with Policies 01 and 04 of the adopted Local development Plan (LDP). It is however a departure from Policy 57 (Town and District Shopping Centres) and the reason for this departure is detailed in the following section.

Change of Use from Retail to Residential in the Retail Centre Boundary

Policy 57 of the LDP (Town and District Shopping Centres) states that within the district shopping centre of Saundersfoot, changes of use, redevelopment or development of new buildings will be permitted where the proposal falls within Class A1, A2, A3, B1, C1, D1 or D2 of the use classes order or is a sui-generis use normally found in such shopping centres. Residential use (C3, C5 and C6) is therefore precluded in the retail centre other than above ground floor level.

Retail and commercial centres experience growth and decline and Planning Policy Wales 12 (paragraph 4.3.6) specifies that development plans should strategically respond to opportunities and pressures. The retail emphasis in Saundersfoot has changed since the Saundersfoot Harbour redevelopment and new development of the Ocean Square retail units adjacent to the Old Coal Building on the seafront. The retail centre has in effect, contracted on the High Street and grown to the east in response to new development. This flux of retail and commercial centres is acknowledged in Planning Policy Wales (Edition 12, February 2024) which states in paragraph 4.3.37 that changes to residential use may be acceptable and help to contribute to the viability and vibrancy of a centre. This is contrasted with the scenario that the application site buildings will remain vacant and fall into disrepair, exacerbating the contraction of retail on the High Street and negatively affecting the retail centre (and Saundersfoot) overall.

This change to the retail centre has occurred since the retail centre boundary was mapped for Local Development Plan 2. Whilst rationalising the retail centre boundary of Saundersfoot will come under assessment for the next LDP, a pragmatic approach is currently required in response to the present use and activity evident in Saundersfoot retail centre.

The applicant has submitted evidence as part of the planning application to demonstrate that the commercial property has been marketed for a minimum of 3 years. It is considered that this marketing exercise has been undertaken for a reasonable and adequate length of time with no evidence of interest. Feedback received by the applicant suggests that such commercial properties are too far from the main shopping area. A new business, in a new location (such as this) will be acutely aware of the perceived pattern of retail and commercial footfall on the High Street compared to elsewhere in the retail centre (or new Ocean Square units).

It is therefore considered that in this instance, the evidence of marketing submitted is a significant material consideration, particularly when combined with the potential negative impact on the special qualities of Saundersfoot that two vacant properties

may have. In this instance therefore, it is considered that a change of use which will ensure an active use of the properties is acceptable.

Siting, Design and Impact upon the Special Qualities of the National Park:

Policy 08, Special Qualities, of the Pembrokeshire Coast National Park Local Development Plan, is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced. These qualities are characteristics and features which individually or in combination contribute to making the National Park unique.

Policy 14 of the LDP seeks the conservation of the Pembrokeshire Coast National Park, resisting development that would cause significant visual intrusion, be insensitively or 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.

Dolphin House and Myrtle Cottage have the appearance of a pair of dwellings. The proposed alteration to the front of both buildings which consists of replacement glazing to the bay windows is considered an improvement to that existing. The Buildings Conservation Officer comments that the character and appearance of the Conservation Area is preserved. The proposal also includes replacement glazing at the rear and the reopening of an original doorway. These elements will have little impact on the appearance of the buildings and similarly are considered an improvement.

The development will positively improve the character and appearance of the application site buildings and enhance the special qualities of the National Park. As such, the development complies with Policies 8, 14 and 29 of the LDP and can be supported.

Amenity and Privacy:

Policy 30 of LDP2 seeks to protect the amenity of people living in the National Park and states that development will not be permitted where there is an unacceptable adverse effect on amenity, particularly where: a) the development would have a detrimental impact on the quality of the environment currently enjoyed by people living, working or visiting the Park; 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 effect; and/or d) the development is visually intrusive.

No detrimental amenity impacts are anticipated. The proposed development allows for adequate amenity space of each separate unit within the application site. Both properties are flanked by residential units, one of which shares a similar rear building line. There are no new openings for fenestration and all rear windows face towards the rear curtilage garden areas. Any overlooking impact towards the adjacent

converted chapel to the east is existing as a result of the existing first floor flats, thus the proposal creates no new impacts of overlooking.

The proposal accords with the objectives of LDP Policy 30 in that it does not adversely affect the privacy and amenity of the occupiers of neighbouring properties or those experiencing the National Park's special qualities.

Other matters:

Access and Parking:

LDP policy ensures that opportunities are taken to improve and promote sustainable travel choices and reduce the need to travel by car. The property is located within Parking Zone 1 for Saundersfoot and as such, no parking spaces are required.

Biodiversity:

PPW 12 requires development to achieve a net benefit for biodiversity. The application has considered this net gain via the inclusion of a Green Infrastructure Statement which proposes 2 no. bird boxes, one on each of the rear elevations of the properties. This biodiversity enhancement proposal is also indicated on plans.

Conclusion

The proposed change of use from commercial to residential represents a departure from LDP policy (Policy 57). However, the retail centre has shifted due to the introduction of new retail units as part of the Harbour redevelopment. This has led to a contraction of retail use on the northern flank of the High Street which has become predominantly residential use. A significant marketing exercise has been undertaken by the applicant which shows a lack of interest in continuing the retail use function of the property. This is a significant material consideration. Planning Policy Wales encourage a flexible approach to centres and on this basis, it is considered that change of use to residential at this particular location will not be detrimental to the retail centre. It will instead enhance the High Street by ensuring an active use for these properties as opposed to vacant units, thereby contributing to the special qualities of Saundersfoot. As a whole therefore the proposal is considered to comply with the overall aims of LDP2, notwithstanding the technical departure to Policy 57.

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.

As such, the proposal complies with policies 1, 4, 8, 14, 29, 30, & 59 of the adopted Local Development Plan 2 2020, Planning Policy Wales and TANs 5, 12 and 24, and can be supported.

Recommendation

APPROVE, subject to the following conditions:

1. The development shall begin no 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. In accordance with the following plans and drawings:
Location plan – Drawing No. 113DHR/01B
Proposed front elevation - Drawing No. 113DHR/09A
Proposed rear elevation - Drawing No. 113DHR/10A received 23/05/24
Proposed site plan – Drawing No. 113DHR/12B
Proposed ground floor plan – Drawing No. 113DHR/07B
Proposed first floor plan – Drawing No. 113DHR/08B
Planning statement (including GI statement) – Document ref. DB/230011/R0001
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 biodiversity enhancement scheme consisting of the proposed 2 no. bird boxes on the rear elevation of the hereby approved development shall be implemented prior to occupation and retained as such in perpetuity.
Reason: In the interests of maintaining the special qualities of the landscape and habitats of the National Park 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), 11 (Protection of Biodiversity), 14 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity) and to comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016.

4. Any additional external lighting details should be submitted to and approved in writing by the Local Planning Authority prior to installation. Any additional external lighting in connection with the proposed development should be low level, hooded and downward facing to avoid light spill, and should be operated on a PIR activated timer. **Reason:** In the interests of maintaining the special qualities of the landscape and habitats of the National Park 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), 11 (Protection of Biodiversity), 14 (Conservation of the Pembrokeshire Coast National Park), 30 (Amenity) and to comply with the Wildlife & Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 and the Environment (Wales) Act 2016.

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Parc Cenedlaethol
 Arfordir Penfro
 Pembrokeshire Coast
 National Park

Graddfa/Scale: 1:1,250

