

Pembrokeshire National Coast Park – Hearing examining the Local Development Plan.

Matter 2 - Special Qualities of the National Park

**Tenby Civic Society, represented by Harry Gardiner, member of Executive committee.
Ref – Focussed Changes no 27, representation 3511/67**

Statement on open spaces, Item 7c) Tenby Inset Maps C41, C42.

**A Site references 414 (adj.84 The Glebe) and 415 (adj 70 The Glebe);
- *it would be sound to correct the boundaries to those now on the ground, rather than on the OS maps. At a discussion with Park officers it was agreed that these new boundaries would be corrected,* noting that for 415 the open space opposite, adjoining 93 The Glebe should be included too. *(see photos 1 and 2 in Annexe)***

**B Site reference (none) Rosemount Gardens, off Heywood Lane, Tenby.
- *It is unsound to exclude this site – it has the same character as others included so is appropriate for inclusion.***

The whole amenity grassed open space either side of the cul de sac road is similar in size and function to the grassed areas already included in the Inset map for Merlins Gardens. The Executive Committee of the Society saw this as a larger more important open space site than those the Authority agreed to add to the plan in The Glebe. This is an example of the sites the Society's Characterisation study identified. The space is either side of a rising access road to the houses tucked round the edges of the development site, so providing a mini 'village green' type of semi private grassed area for residents, hidden from the main road. With the house fronts on east and south and a stone boundary wall with trees on the west it has a very similar character, as a quiet concealed green area with houses facing onto it, as Merlins Gardens.

**Also the Committee felt without protection there would be a risk that Rosemount Court's garden could be expanded into the central grass area of the scheme.
(see photo panoramas 3 and 4)**

The initial stages of the Characterisation Study the Society has carried out was valuable for identifying spaces that contribute positively to their setting many of which the Authority added to the first draft. The Characterisation Study also led to the Society suggesting that " spaces" should be added to "buildings" in Policy 15. That policy was altered but to include " or their settings are conserved" .

C The Executive Committee wish three other sites to be considered as sound for inclusion; The Authority took the view in discussions that they fell outside the Centre Boundary, so were safe from the " presumption for development " inside the Centre Boundary.

However they all fit within the types of open space in Annexe B Tech Advice Note 16;

Type(v) amenity; **Butts field grassed area**

Type (viii) cemeteries ; **Tenby Cemeteries**

Type (i) Public parks and gardens and type (ix) accessible adjoining or connected to the Urban area – **Allens View.**

Is the absence of the presumption for development sufficient protection, or do the acknowledged merits of open spaces not exist outside Centre boundaries?

It seems unsound to exclude spaces adjoining the town and functioning for it. This needs reversing or the basis for it needs clarifying.

The previous Development Plan currently in force had large open spaces designated just outside the Centre Boundary, (see photo 6 in Annexe) so there seems no technical reason to exclude the three spaces we suggested. They are appropriate and fit test 2, and the Cemeteries are included in the newly adopted Expanded Tenby Conservation Area Boundary so could be held to satisfy test 1, being identified in another plan.

1 Open space north of Butts Field Car Park

A small grassed area bordered by TPO'd trees, containing benches and a wildlife interpretation notice accessed from the public car park. Clearly a piece of public open space, the only reason for non inclusion is being exactly outside the Centre Boundary.

Is open space not open space outside the Centre Boundary? In function this is part of the town.

2 Tenby Cemeteries

Similar points apply, but also the cemeteries have value being managed as a wild life resource, forming an important green setting on its hill above the town and with fine views from a quiet tranquil space.

Including the site in Tenby Conservation Area boundaries values the cemeteries for their landscape setting, historical associations with the town and connection with the bordering old lanes of Slippery Back (the pre Victorian Road into Tenby) and Blind Lane. **Inclusion could also 'fit' Test 1 ?**

3 Allens `View (see photo 5 in Annexe)

Having maintained this woodland site for " the quiet enjoyment of the public" for 52 years we remain puzzled why it does not earn the protection of open space designation. Properties either side have either been sold (enforcement issues are current) or been up for sale and one property has escalated its use so protection outside Centre Boundaries is not yet evident to us! The detachment of the site is misleading as it is alongside Waterwynch Lane, a pre Victorian lane, part of the Coast Path, with substantial ancient hedges and banks forming a linear wildlife resource. Identifying such linked green resources (including TPOs) "*green infrastructure*" seems marginal - issues about protected species are more prominent.

Is it simpler to cast a protective blanket over the Park outside Centres (Policy 7 ?) than to identify on the inset maps the variety of specific resource sites such as Allens View in the wide areas outside Centres ? Policy 8(j) looks to enhancing "green infrastructure" for just such cases ?

Adendum

Item 7 separate policies for Open Spaces and Green Wedges?

We see no reason why either approach could not be sound.

7 a) We see the Northern **Green Wedge** at Tenby as important to separate Tenby from New Hedges. It has been robustly defended against potential development; an road required across it to access the Bryn Hir potential housing site would have clearly have tempted developers to propose housing either side of it to defray the extra costs. No such additional scheme has been even been submitted. Both the Park and the County (as owners) recognise its value.

7 b) We have no comment other than thinking it would be sound to provide local play areas in new housing schemes over a certain size.

On behalf of Tenby Civic Society, by Harry Gardiner, member of the Society's Executive Committee and chair of the Planning sub committee of the Executive.
harry.gardiner@uwclub.net.

Annexe.

Photo evidence 4511, open space allocations in Inset maps for Tenby. Tenby Civic Society.

Photo 1 Amenity space beside No.2 The Glebe Tenby



Photo 2 Amenity spaces beside number 70 and 93 (foreground) The Glebe Tenby



Photo 3 - Amenity space at Rosemount Gardens Tenby; 180 degree panorama taken by the entrance in the winter.
(panoramas produce considerable distortion but do include a wide slice of landscape)



Photo 4 - Amenity space inside Merlins Gardens, Tenby. 270 degree panorama - much sunnier summer day!
(again note the distortion !) Both sites use grassed areas between the roadway and the house fronts and front gardens, to make an open vista to the house grouping, for visual character and surveillance.)



The area added by the Authority at our suggestion is the grass on the left.

Photo 5 - A 180 degree panorama inside Allens View. The view from the hilltop south can be glimpsed in the centre right.



Photo 6 Current LPD Tenby Inset map, part of.

