

Item 5 - Report on Planning Applications

Application Ref: NP/14/0637

Application Type	Full
Grid Ref:	SS05589920
Applicant	Mr W Staniland
Agent	Mr A Vaughan-Harries, Hayston Development & Planning
Proposal	Diversification of Brumwells Garden Machinery with the provision of 12 sustainable wigwam lodges with car parking on adjacent land. Link the existing dwelling of Badgers Holt as a live-work dwelling for the two businesses.
Site Location	Brumwell Garden Machinery, Badgers Holt, Jameston, Tenby, Pembrokeshire, SA70 8QB
Case Officer	Andrew Richards

Summary

Then application is reported to the Development Management Committee due to a request from a member of the Authority.

This application seeks permission for the change of use of the garden area of the property Badgers Holt to a glamping holiday site comprising twelve wigwams and associated road access, car parking spaces, cycle store and foul water discharge and the linking of the existing dwelling Badgers Holt as a live/work unit to the glamping site and existing garden machinery business.

The key issues to be considered in this case are the principle of development, the impact of the proposal on the visual amenities of the area, the impacts on trees and planting and biodiversity, minerals safeguarding, highways and access issues, sewage infrastructure issues and other material considerations.

The principle of this proposal does not comply with adopted policies in relation to the provision of new camping, caravanning and static sites within the open countryside. Furthermore, the proposal would represent an unacceptable intrusion into the countryside, which would be out of character with and detrimental to the special qualities of the National Park. Whilst the applicant's agent has stated that he considers that there are material considerations that override the adopted policies in this case, it is not considered that these considerations are compelling to justify a departure to the development plan. As such the application is not considered to be acceptable and is recommended for refusal.

Consultee Response

Manorbier Community Council: Approve

Dyfed Archaeological Trust: No adverse comments

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Natural Resources Wales: No objection - Would however recommend that the applicant produces a pollution prevention management plan detailing all necessary pollution prevention measures for the construction phase of the development.

PCC - Transportation & Environment: Conditional Consent

Public Response

A site notice was posted and letters forwarded to the adjoining occupiers in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012. No comments have been received at the time of writing this report.

Policies considered

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

LDP Policy 01 - National Park Purposes and Duty
LDP Policy 07 - Countryside
LDP Policy 08 - Special Qualities
LDP Policy 09 - Light Pollution
LDP Policy 13 - Historic Landscapes Parks and Gardens
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 21 - Minerals Safeguarding
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 32 - Surface Water Drainage
LDP Policy 35 - Visitor Economy
LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW7 Chapter 04 - Planning for Sustainability
PPW7 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW7 Chapter 06 - Conserving the Historic Environment
PPW7 Chapter 07 - Economic Development
PPW7 Chapter 08 - Transport
PPW7 Chapter 11 - Tourism, Sport and Recreation
PPW7 Chapter 12 - Infrastructure and Services

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PPW7 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG05 - Sustainable Design

SPG06 - Landscape

SPG10 - Safeguarding Mineral Zones

SPG12 - Parking

SPG13 - Archaeology

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 23 - Economic Development

Officer's Appraisal

Background and History

The application site is situated to the north side of the village of Jameston and is currently occupied by an existing dwelling, Badgers Holt, with its associated outbuildings, and a large, mature garden area extending to the north adjacent to the rural lane that follows its eastern boundary. The outbuildings have been used for a number of years for the sale and repair of garden machinery. The applicant made a pre-application in 2013, seeking to diversify his business by providing tourist accommodation through the provision of a number of "glamping" wigwams in the garden area. The advice given at this time was that new tourist accommodation in the countryside is contrary to the development plan and as such it would be necessary for the applicant to demonstrate that other material considerations override the normal policy position to justify the development.

- NP/13/0392 - Change of use of garden area at Badgers Holt to glamping holiday site comprising twelve mobile wigwams. Linking of existing dwelling Badgers Holt as a live-work unit to the glamping site and existing garden machinery business - Refused – 15th November 2014.

The reasons for the above refusal included:

1. The creation of new camping, caravanning and static caravan or chalet sites are not permitted,
2. The proposal represented an unacceptable intrusion into the countryside, which would be out of character with and detrimental to the Special Qualities of the National Park.
3. The application proposed a private sewage treatment works in a public sewered area, contrary to government advice.

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Constraints

LDP Mineral Safeguard
Biodiversity Issue
Historic Landscape
Potential for Surface Water Flooding
Recreational character Areas

Current Proposal

This is a full application which seeks permission for the change of use of the garden area to a glamping holiday site comprising twelve wigwams and associated road access, car parking spaces, cycle store, connection to mains foul sewer and the linking of the existing dwelling Badgers Holt as a live/work unit to the glamping site and existing garden machinery business. The wigwams would be accessed via the existing access into the site and would be placed around a central spine road with associated parking space for unloading. The main parking would be situated at the southern end of the site. The site is covered with mature planting and the proposals would involve the loss of some mature vegetation but also includes additional landscaping as part of the proposals.

In support of the application, the applicant's agent states that it has become necessary to diversify the existing garden machinery business due to changes in retailing patterns and for the applicants to have a business which they can manage from home. The business employed five full time sales and engineering staff at its outset ten years ago, but now only employs three people, who are members of the family engaged on a part time basis only. The business has been for sale for over 24 months without interest and it is stated that in the absence of any diversification the business will not survive. The intent is therefore to manage the wigwam business as the primary activity with the garden machinery operation as the secondary business but with the house occupation tied to the businesses.

The wigwams are portable mobile units which sleep up to 5 adults and offering a low cost sustainable holiday option all year round. This type of accommodation is considered to be a new wave of imaginative and sustainable holiday not dependent on good weather. It is stated that the visitors will contribute to both the applicants' income and also to the wider economy through the use of local services and attractions. The applicant's agent also states that the application provides an opportunity for the Authority to control other B1/B2 uses that might be able to take place under the existing use of the garden machinery business which would be beneficial to noise control in the area.

The application was accompanied by a Planning Report, incorporating a Design and Access Statement, transport statement, Accessibility assessment

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and an Economic Impact Report, a tree report and details of the foul sewage system.

The application has been advertised as a departure from the Development Plan.

Key Issues

The key issues to be considered in this case are:

- The principle of development
- The impact of the proposal on the visual amenities of the area
- Impacts on trees and planting
- Impacts on biodiversity
- Mineral Safeguarding
- Highways and Access issues
- Sewage infrastructure issues
- Privacy and Amenity
- Other Material considerations

The Principle of Development

The site is situated to the north of the defined rural centre of Jameston in the Local Development Plan (LDP) in an area defined as countryside. As such, policy 7 is the strategy policy relating to this site where development will only be permitted for certain reasons, none of which relate to this particular proposal, being an application for new tourist accommodation.

The proposed wigwams are considered to fall under the statutory definition of a caravan for planning purposes, requiring hard core pads for siting. The submitted documentation put forward as part of the application agrees with this classification. LDP policies 35 and 38 state that additional camping, caravanning or chalet pitches will not be permitted but change over to other forms of self-catering, for existing sites within centres, will be permitted. A restrictive policy against new and extended caravan sites has existed in the National Park since the mid 1970's, and has gone through a total of four development plan examinations in this period.

The supporting text to policy 35 states:

'The strategy for visitors is to attract an optimal number, origin, type, duration of stay and spend of visitors all year round while ensuring that the National Park environment continues to hold its attraction as a landscape of national and international importance. This is best achieved in land use terms by not adding substantively to the overall provision of visitor accommodation, as this could encourage further 'peaking' and cause damage to the National Park landscape and special qualities, both in terms of the impacts of the additional development and increased activity in some 'hot spot' locations.

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Instead, the future for the National Park in this Local Development Plan is one where by the end of the Plan period a range of quality holiday accommodation, similar to the level and distribution of provision at the beginning of the Local Development Plan period, is retained to suit a range of pockets. Within the Local Development Plan's Centres upgrading is allowed so that more accommodation can be made suitable for the off peak season and the quality of the offer for the visitor is also improved.' (paras 4.152 - 4.153).

The policy is specific in limiting self-catering accommodation to brownfield sites within Centres or through the conversion of appropriate buildings in the countryside and this is based on an evidence-based approach supporting the production of the Local Development Plan.

The National Park occupies 38% of the land area of Pembrokeshire, but accommodates 56% of caravan sites. These sites also have greater occupancy rates than those outside of the Park, which subsequently have more vacant pitches available as a result.⁶

The submitted planning statement refers to numerous statements within Planning Policy Wales ('PPW')(Edition 7 July 2014) that supports the provision of tourism related development within rural areas and diversification of existing businesses within the rural economy. However, whilst it is acknowledged that the site in question is an existing employment site (although it is considered that the existing demonstration area would not be classed as previously development land as defined under Figure 4.3 of PPW), for which other uses may be considered appropriate, the particular use proposed is one which, in the local context of the National Park, is not considered appropriate as directed by the above local planning policy.

In summary of the above considerations it can be concluded that the proposal does not comply with the terms of policies 7, 35 and 38 of the Local Development Plan and, as such, the principle of development is not acceptable.

The impact of the proposal on the visual amenities of the area

The site is surrounded by well-established trees and hedgerows and also contains mature planting within its boundary which would assist in reducing the overall visual impact of the development. Whilst the amended proposal includes the retention of a large proportion of high quality trees within the site, the introduction of twelve wigwams with the associated access road, parking bays, and car park, irrespective of the retention of trees, will fundamentally alter the character and visual appearance of this mature garden to the detriment of the countryside character of this part of Jameston. The existing mature garden area whilst used in combination with existing business for

⁶ Local Development Plan Background Paper: Enjoyment February 2014 p.25-26

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display of machinery is not considered to be previously developed land and comprises a well-kept lawn area with various trees located on the boundary and also within the site which creates a very attractive garden area that remains free from development and also complements the adjacent countryside setting with its mature landscape setting. The proposed development would appear as a clear extension of the built area of Jameston into open countryside and would not protect the special qualities of the National Park as required by policies 1, 8, 15 and 30 of the LDP.

At the time of the formulation of the LDP this site was considered for its potential for development, but was not included within the boundary of the settlement partly due to the detrimental impact that developing this site would have on the character of the National Park.

Impacts on trees and planting

The mature planting on the site comprises a mix of species, but these are mainly native including sessile oak, willow, ash, maple, cherry and apple.

The arboricultural report submitted as part of the application puts the trees into four categories; A - High quality and value, B - Moderate quality and value, C - low quality and value and U - unsuitable for retention. A, B and C were also afforded sub categories relating to their value for arboricultural, landscape or cultural/conservation reasons. Category C trees were identified for retention where possible but with a general presumption that they can be removed to facilitate development. One category B tree and eight category C trees are now highlighted for removal along with one category U tree. The report states that the loss of numerous trees will not have a great effect on local amenity as they are internal to the site, whilst their removal will reduce mature landscaping that would be beneficial to the completed development the report also states that the removed trees will be replaced with native standard or heavy standard root balled specimens and removals will be replaced at a rate of at least two to one. The report also highlights the fact that the amended drawings have been submitted to ensure the retention of the higher value category B trees within the site.

The locations of the wigwams are considered to be permanent given the construction of the road layout and foul drainage runs within the site are permanent features, this also includes the individual unloading bays and this element results in the loss of one category B tree. It is also your officer's view that the submitted amended layout plan with amended road and bays is proposed to minimise the loss of important trees within or on the boundary of the site.

The Authority's Landscape Officer is of the opinion that the cumulative loss of the trees would now not be detrimental to the site as a whole and advised that the amended design layout is considered to allow the majority of the trees to be retained. It is considered that the current proposals take the existing established landscape features into account fully so as to allow the successful

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interaction with the proposed development and existing features and therefore the current proposals are acceptable in terms of tree loss.

Impacts on biodiversity

The Authority's ecologist has considered the proposals and is of the view that there is a low likelihood of protected species being found at the development site or that there would be any adverse impact on the habitat or species as a result of the development. As such no objection is raised on these grounds.

Minerals Safeguarding

The above site is located on an area of land safeguarded for its mineral resource, which is identified as limestone. LDP Policy 21 'Minerals Safeguarding' requires the extraction of minerals before development which would otherwise sterilise mineral resources, provided there is no suitable alternative location and an overriding need for development and extraction can be achieved. The 'Safeguarding Minerals Zones' SPG provides detailed guidance on how the Authority will assess this consideration when determining planning applications.

Due to the proximity of neighbouring 'sensitive' development (residential), the land in question would already be sterilised. As such, prior extraction of the mineral resource is not considered appropriate in this case, the application is therefore considered acceptable in this respect.

Highways and Access issues

The Highways Authority has confirmed that it has no objection to the proposals subject to a condition requiring the parking and turning area to be completed prior to the development and retained for no other use.

Sewage infrastructure issues

The application is proposing to dispose of foul effluent to the public sewer via a pumping station to be located within the western area of the site. National Resources Wales (NRW) has no objection to this method of foul water discharge, but suggests that the applicant produces a pollution prevention management plan detailing all necessary pollution prevention measures for the construction phase of the development. Dwr Cymru Welsh Water has also been consulted but no formal response has been received to date.

Privacy and Amenity

The site is situated, in the main, away from other residential properties, with the nearest property being situated to the west, immediately behind the existing workshops used for the garden machinery business. The closest wigwam shown on the plans would be situated some 40 metres away and it is not considered that any adverse effect would arise from this proposal. In addition the western boundary is well screened with mature planting and

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subject to a condition requiring this to be retained no objection is raised on privacy or amenity grounds.

Other Material considerations

In light of the above considerations, it is considered that the application fails to comply with a number of adopted LDP policies. As such, it is necessary to consider whether there are other material considerations that would justify allowing this development as a departure from the plan.

In this respect, it is noted that the re-submitted scheme shows an improved layout which enables additional trees to be kept within the site, thus further reducing the visual impact of the proposed development. However, the diminished visual impact does not outweigh the fact that development of the site would comprise a clear extension of the built area of Jameston, into open countryside. It is also important to note that during the LDP's examination, the Inspector did not question the appropriateness of the proposed Jameston settlement boundary, which does not include any of the existing site in question.

The application provides information in relation to the need to diversify the existing business to provide a new income stream to enable the business to survive. In addition, the application includes a proposal to "tie" the existing dwelling to the glamping and garden machinery business to avoid severance of the dwelling from the businesses. It also suggests that controls could be put on the existing business to ensure that any change in the nature of the business as allowed under the Use Classes Order is controlled in the interests of amenity of adjacent properties. The application includes an economic appraisal of the contribution that this business would make to the local economy through new upgraded tourist facilities and to meet a new tourism demand.

As with the previous application, an economic case is brought forward for the proposed development, the content of which does not appear to have changed from the previous submission. It shows financial viability for the business and wider economic benefits to the local community. Whilst it is accepted that the existing business may be undergoing difficult times, and that there may be a need to upgrade facilities to meet changing tourism demands, this application is essentially an application for a change of use to a new camping site. The wigwams whilst being of a higher quality than traditional tents and caravans, still fall under the same use class and are therefore a proposal for a new caravan site contrary to policy. The LDP has been adopted on an evidence base that on the existing level of provision of such sites within the National Park (and which for those existing can include an upgraded type of accommodation) there is no need to permit additional sites to accommodate new trends as these can be accommodated under the existing policy framework.

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Furthermore, the argument that new accommodation is required to provide additional income for existing businesses is one that can be used across the National Park and to allow this proposal would set a very undesirable precedent for similar proposals, the cumulative effect of which would be to undermine the National Park's primary purpose.

The economic benefits are not contested. However, as mentioned above, the LDP provides flexibility for updating existing sites within the centres to adapt to new trends in tourist accommodation demand. It also allows for other forms of tourist related development in appropriate locations within the centres or where a countryside location is essential. However, due to the existing level of caravan pitch provision within the National Park, it is not considered necessary to permit additional sites to accommodate new trends in consumer demand; instead the strategy outlined above seeks to encourage the upgrading of appropriate existing sites. The economic benefits can accordingly be achieved without recourse to this site.

The offer of tying the house to the business and controlling future uses of the garden machinery workshop are also not considered to be compelling in allowing a departure from well-established and tested policies that have been adopted.

Whilst there is some sympathy with the applicants difficulties with his existing business and some weight can be afforded to the above material considerations, they do not outweigh the overall purposes of the National Park, the need to protect its special qualities and the clear policy presumption against this form of development. As such the application should be refused due to its non-compliance with the development plan and material considerations not outweighing the same.

Conclusion

The principle of this proposal does not comply with adopted policies in relation to the provision of new camping, caravanning and static sites within the open countryside. Furthermore, the proposal would represent an unacceptable intrusion into the countryside, which would be out of character with and detrimental to the special qualities of the National Park. Whilst the applicant's agent has stated that he considers that there are material considerations that override the adopted policies in this case, it is not considered that these considerations are sufficiently compelling to justify a departure to the development plan. As such the application fails to comply with the requirements and aims of policies 1, 7, 8, 30, 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).

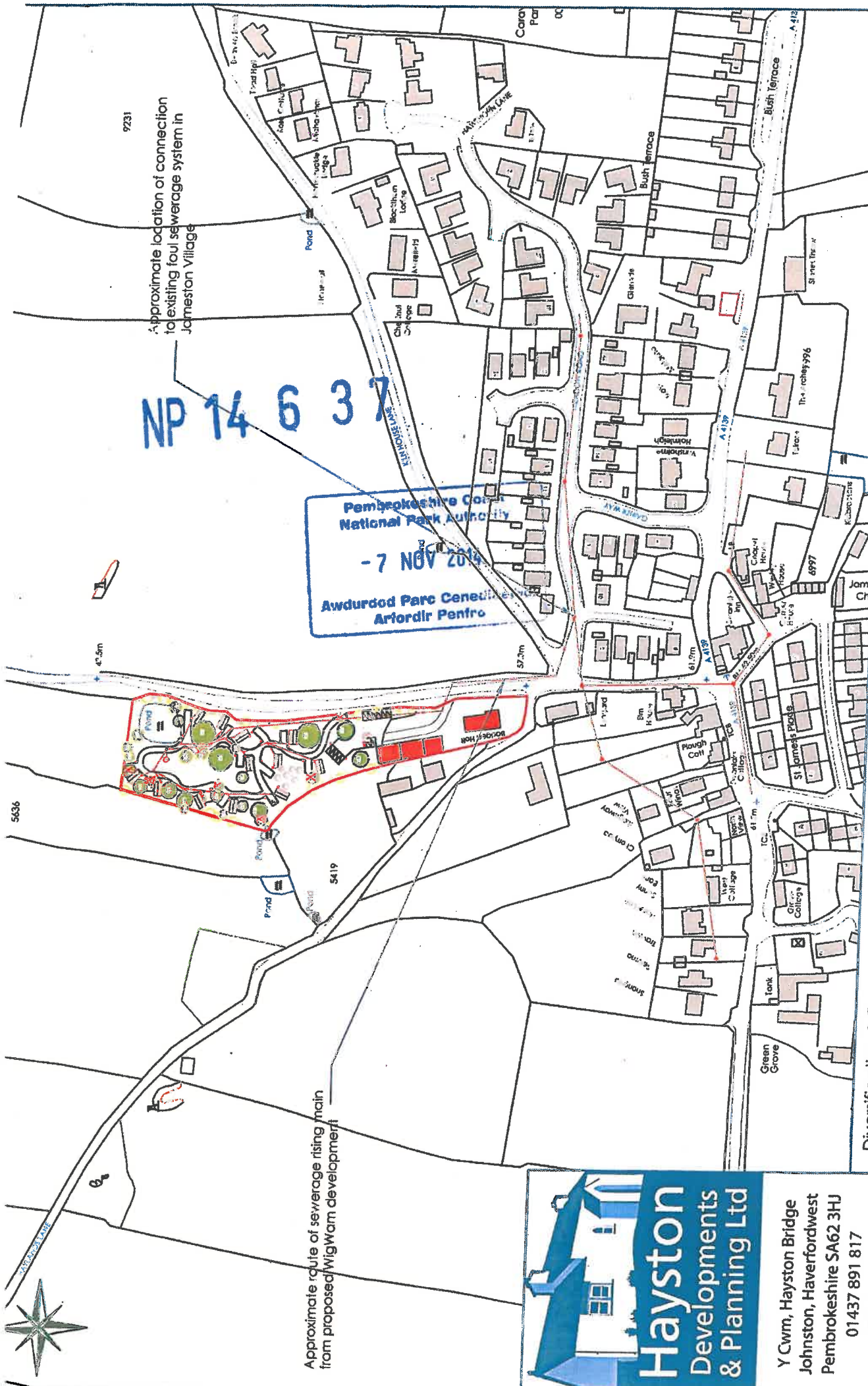
Recommendation

That the application be refused for the following reasons:

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1. Policies 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan state that new camping, caravanning, static caravan or chalet sites will not be permitted in the National Park. The provision of twelve wigwams and their associated development in an open countryside location is therefore contrary to adopted Development Plan Policy.

2. Policies 1, 8, 15, and 30 of the Pembrokeshire Coast National Park Local Development Plan seek to protect and enhance the pattern and diversity of the landscape, and prevent development that fails to harmonise with or enhance the landform and landscape character of the National Park, that fails to incorporate traditional features, and that is insensitively and unsympathetically sited within the landscape and visually intrusive. The proposed wigwams (and the associated ancillary development to them), due to their siting, location, design, and landscape features form a visually intrusive and discordant addition to this rural area that is harmful to the special qualities of the National Park and therefore contrary to Adopted Development Plan Policy.



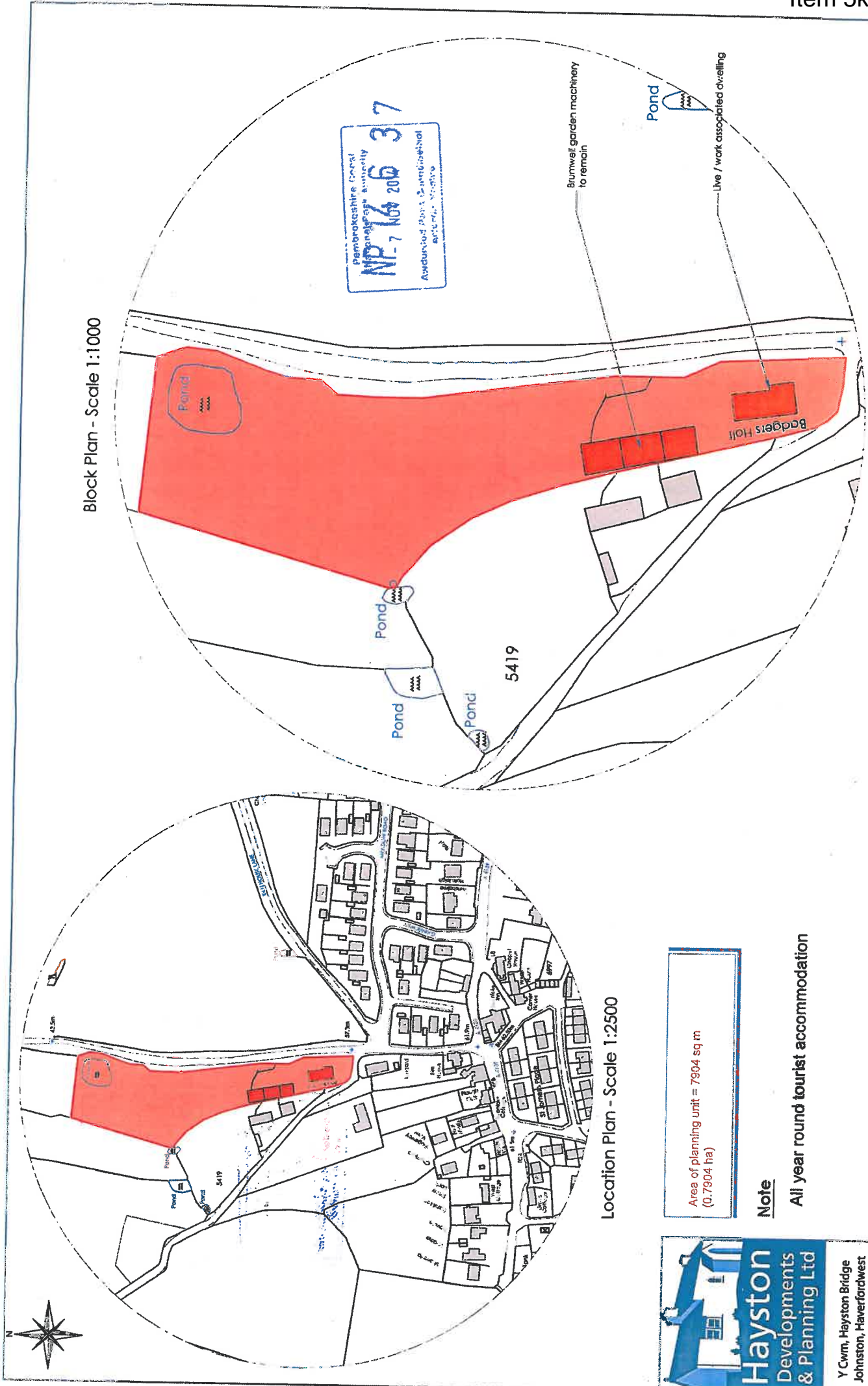
Diversification & Expansion of Brumwell Garden Machinery with 12 No. Sustainable Holiday Wigwams at Brumwell Garden Machinery, Jameston, Tenby, Pembrokeshire

Date 20.10.2014
 Scale A4 @ 1@2500
 Drawing Title Sewer Information Plan

Client Mr & Mrs William Staniland
 Dwg No. **11B**

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Pembrokeshire Council
 Planning & Environment
 NP-7 166 2016 37
 Approved: 16.05.2016
 Planning Officer: [Signature]

Brumwell garden machinery to remain

Live / work associated dwelling

Pond

Bodgers Hall

5419

Pond

Pond

Pond

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Note
 All year round tourist accommodation

Diversification & Expansion of Brumwell Garden Machinery
 with 12 No. Sustainable Holiday Wigwams
 at
 Brumwell Garden Machinery, Jameson, Tenby, Pembrokeshire

Designed by	Checked by	File name	Date	Scale	Client
		AVH_85	02.05.2014	As shown	Mr & Mrs William Staniland
Drawing Title					
Location & Block Plans					
Dwg No. 01m					



Proposed TT Pumps Ltd 'Venus' sealed package sewage pumping station together with high level warning alarm. Rising main to connect to main foul sewerage system in Jameston Village. (See dwg 11n for details)

Proposed site road with traffic calming measures, 'Perfo-AK' ground reinforcement system

Existing boundaries to remain un-altered (To ensure maximum privacy)

Indicative location of 'WigWam' cabins

Route of sewerage rising main to connect to mains system in Jameston Village

Proposed indicative layout of foul drainage system

Existing boundaries to remain un-altered (To ensure maximum privacy)

Approximate position of proposed bike rack

Private drive / parking / turning area for visitors, 'Perfo-AK' ground reinforcement system, (No permanent parking outside cabins, only for off-loading purposes)

Existing boundaries to remain un-altered (To ensure maximum privacy)

Key

⊗ Approximate locations of bollard downlights
500mm high direct down light for pathways and will keep light pollution and glare to an absolute minimum.



Detail for 500mm Bollard Downlight

Indicative location of 'WigWam' cabins

Pre-cast concrete storage to provide 24hr emergency storage in the event of pumping station failure. Alarm system fitted to package pumping station with telephone telemetry system.

Proposed indicative layout of foul drainage system

Existing drainage ditch discharging to pond
5419

Existing boundaries to remain un-altered (To ensure maximum privacy)

Note

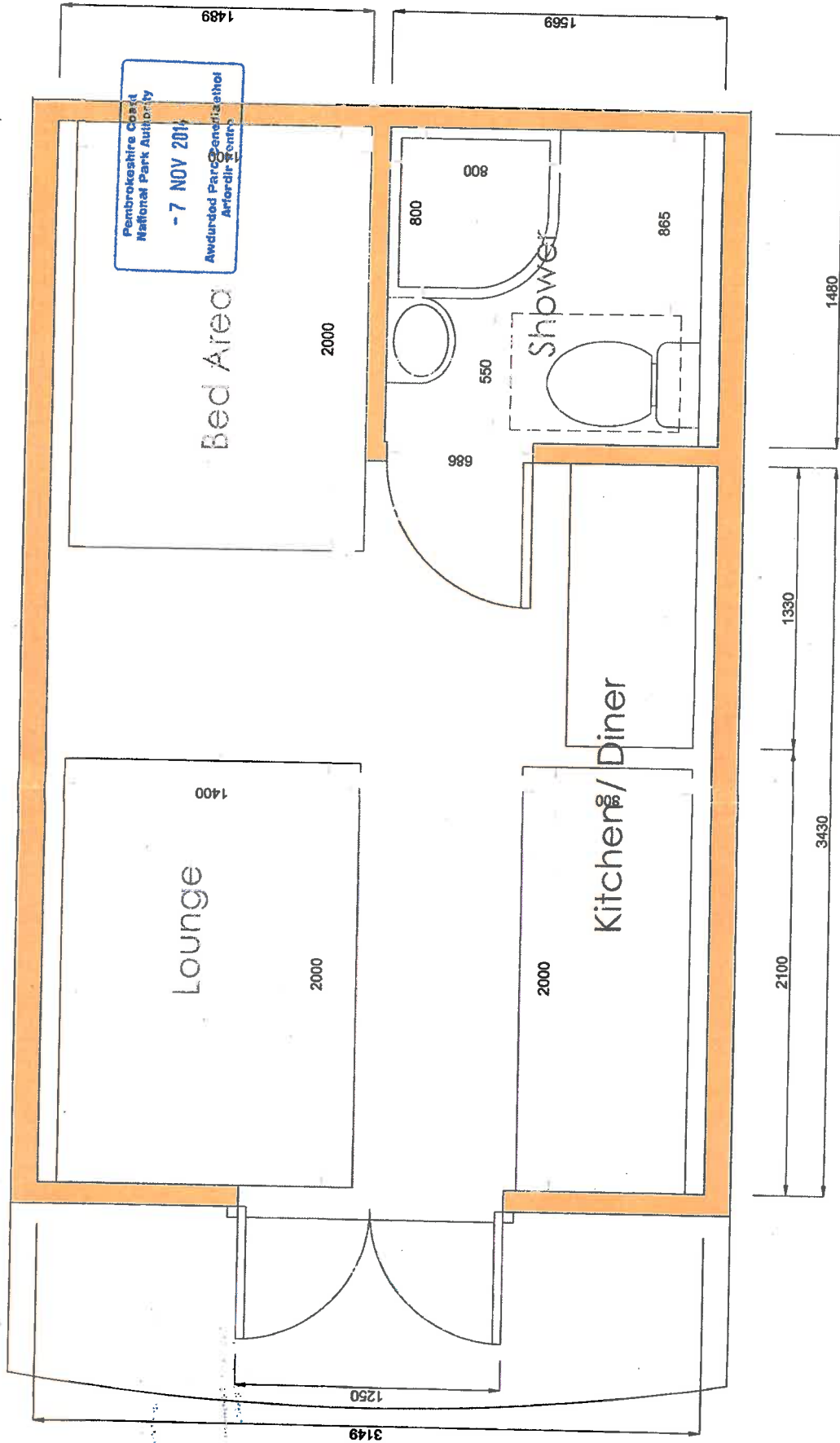
All year round tourist accommodation

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Diversification & Expansion of Brumwell Garden Machinery with 12 No. Sustainable Holiday Wigwams
at
Brumwell Garden Machinery, Jameston, Tenby, Pembrokeshire

File name AVH_85	Date 19.11.2014	Scale 1:500	Client Mr & Mrs William Staniland
Drawing Title Proposed Site Plan			Dwg No. 02s

NF 14 6 37



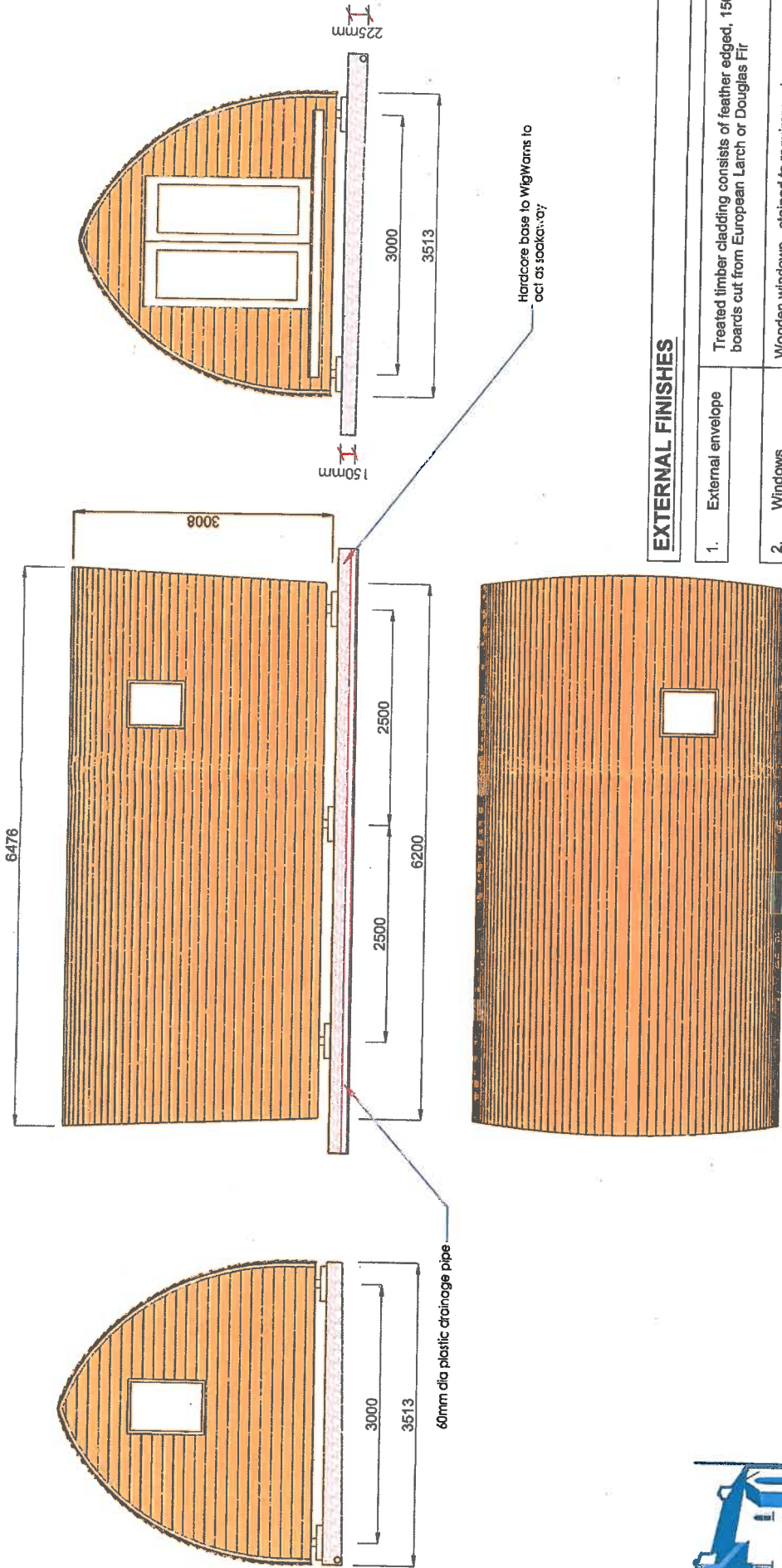
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Diversification & Expansion of Brumwell Garden Machinery
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at
Brumwell Garden Machinery, Jameson, Tenby, Pembrokeshire

Designed by
Checked by
File name
AVH_85
Date
05.05.2014
Scale
A3@1:20
Client
Mr & Mrs William Staniland

Drawing Title
WigWam Floor Plan

Dwg No.
06m



EXTERNAL FINISHES

1. External envelope	Treated timber cladding consists of feather edged, 150mm boards cut from European Larch or Douglas Fir
2. Windows	Wooden windows - stained to requirements
3. Doors	Wooden windows - stained to requirements

Pembrokeshire Coast National Park Authority
 20 NOV 2014
 Awdurdod Parc Cenedlaethol: Arfordir Penfro

Designed by	Checked by	File name	Date	Scale	Client
		AVH_85	19.11.2014	A3@1:50	Mr & Mrs William Staniland
Drawing title					
WigWam Elevations and Roof Plan					
Dwg No. 03n					

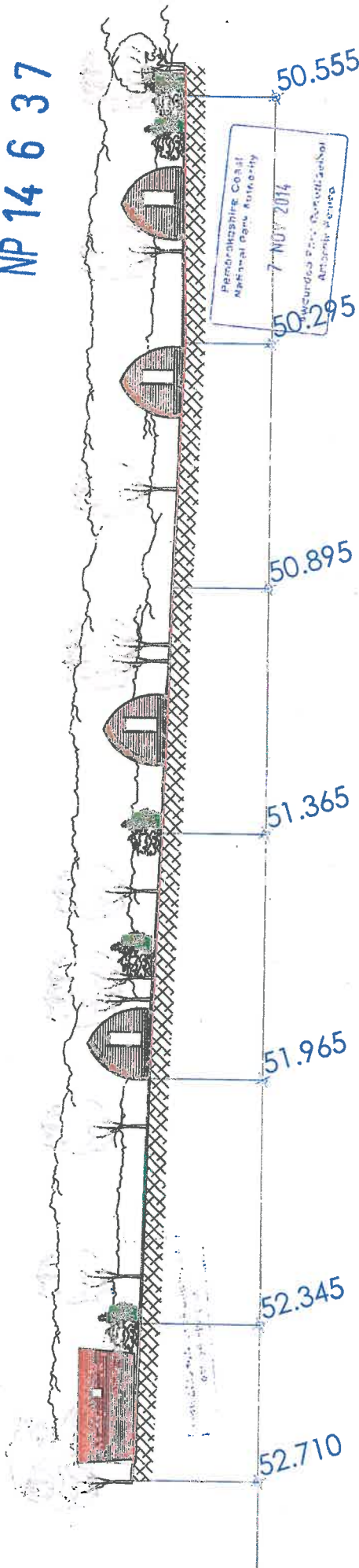
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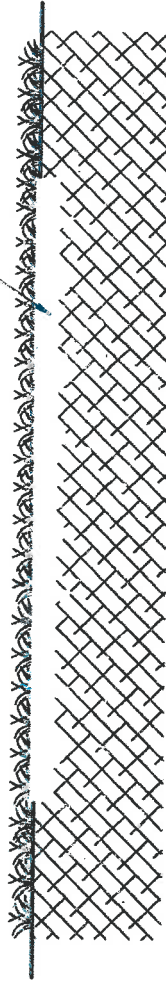
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Sectional Elevation Showing Proposals in Context
(Scale 1:250)

NP 14 6 37



30mm x 300mm 'Perfo-AK' ground reinforcement system
laid directly onto existing grass surface



Typical Detail - Road Construction - Scale 1:10
'Perfo-AK' ground reinforcement system

'Perfo-AK' ground reinforcement system

PERFO system to be laid directly on the existing grass surface, the grass to be cut as short as possible beforehand. Small undulations to be levelled out using topsoil or a sand/soil mixture (20:80). PERFO sections to be laid out in position and clipped together using foot pressure row by row. Installation should only take place when the ground is soft enough to ensure the sections can be compacted into the surface easily and completely.



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Diversification & Expansion of Brumwell Garden Machinery
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Designed by	Checked by	Date	Scale	Client
AVH_85	AVH_85	05.05.2014	A3@1:250	Mr & Mrs William Staniland

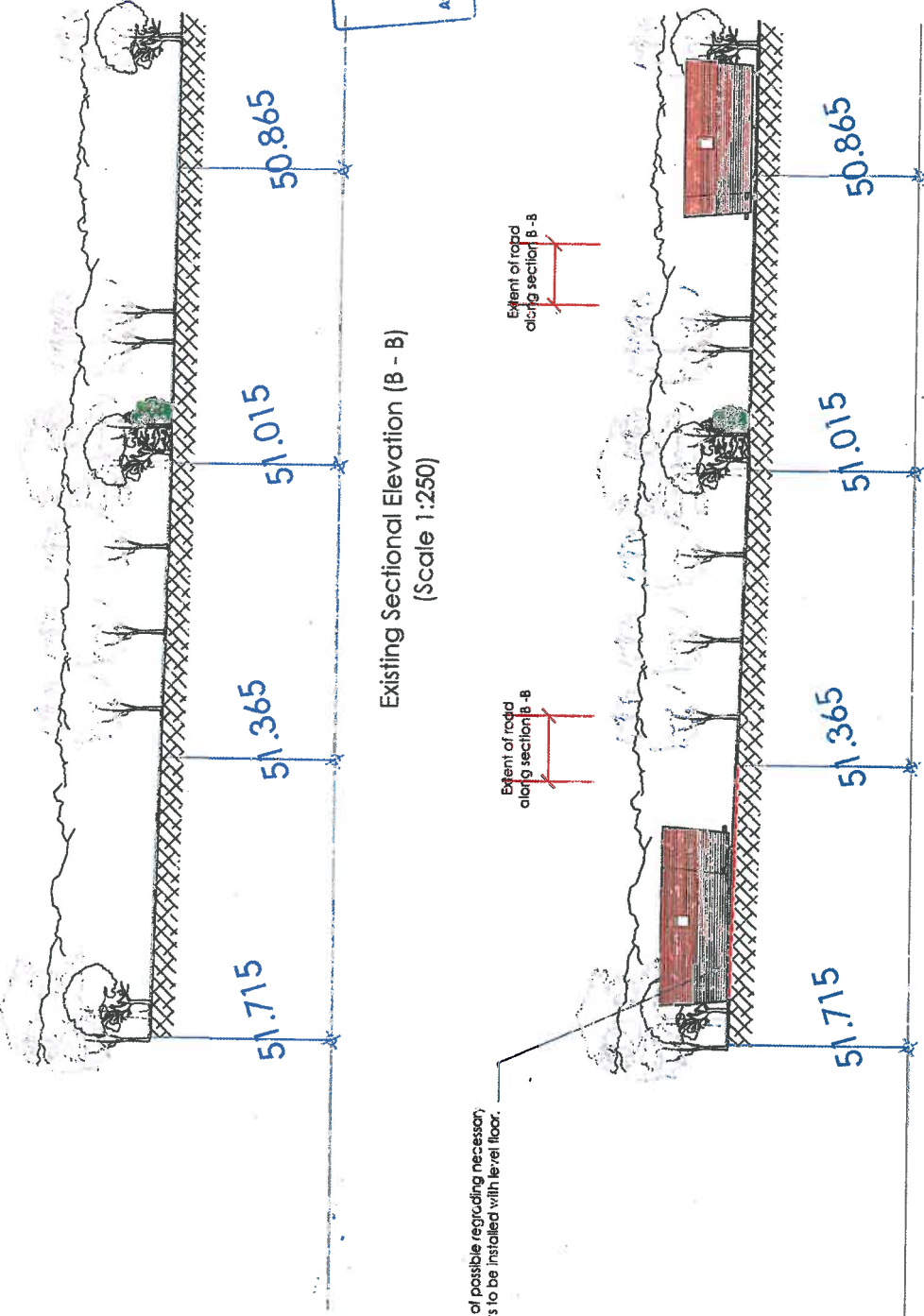
Sectional Elevation in Context plus Road Construction Detail

Dwg No.

05m

NP 14 6 3 7

Pembrokeshire Coast
National Park Authority
- 7 NOV 2014
Awdurdod Parc Cenedlaethol
Arfordir Penfro



Red line indicates area of possible regrading necessary to enable Wigwam units to be installed with level floor. (50 to 150mm)

Extent of road along section B - B

Extent of road along section B - B

Road Construction

PERFO-AK ground reinforcement system to be laid directly on the existing grass surface, the grass to be cut as short as possible beforehand. Small undulations to be levelled out using topsoil or a sand/soil mixture (20:80). PERFO sections to be laid out in position and clipped together using foot pressure row by row. Installation should only take place when the ground is soft enough to ensure the sections can be compacted into the surface easily and completely.

Note

Existing levels to remain un-altered unless slight grading is required around the base of the Wigwam unit to allow for the floor to be leveled in position.
(Anticipated regrading to be between 50 - 100mm around base area only of units.)

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with 12 No. Sustainable Holiday Wigwams
at
Brumwell Garden Machinery, Jameson, Tenby, Pembrokeshire

Designed by
Checked by
Drawing Title
Existing and Proposed Sections along Section B - B (As marked on Site Plan)

File name
AVH_85
Date
05.05.2014
Scale
A3@1:250
Client
Mr & Mrs William Staniland

Dwg No. **09m**

Item 5k)