

Application Ref: NP/19/0522/FUL

Case Officer	Andrew Richards		
Applicant	Mr D Brown & ATEB		
Agent	Mr G Blain, Gerald Blain Ltd		
Proposal	Change of use of land from 85 tents & tourers to 85 static caravans with associated landscaping & distributor roads. Outline planning permission for 14 affordable housing units & 2 market housing units. New sewage pumping station		
Site Location	Buttyland Caravan & Camping Park, Manorbier, Tenby, Pembrokeshire, SA70 7SX		
Date Valid	07-Oct-2019	Target Date	10-Mar-2020

The application is reported to the Development Management Committee for determination as the application is a major development.

Consultee Response

PCNPA Park Direction: Previous response to NP/18/0559 remains valid

PCC - Transportation & Environment: Conditional Consent

PCC - Drainage Engineers: Conditional Consent

Dwr Cymru Welsh Water: Conditional Consent

PCNPA Planning Ecologist: Conditional Consent

Dyfed Archaeological Trust: No adverse comments

Manorbier Community Council: Recommend Refusal

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.

Letters of objection were received from local residents and also the Friends of Pembrokeshire Coast National Park. The material objections are summarised below and full copies of the objections are available to inspect on the application file:-

- Contrary to LDP policy
- Harmful visual impact on the surrounding landscape and on the special qualities of the National Park
- No need for additional affordable housing and its proposed siting also causes concern
- Impact from affordable housing on surrounding landscape and infrastructure
- Lack of information to support the application
- Lack of a suitable buffer between the development and the school

- Privacy and noise impacts between the existing school and proposed residential housing development
- Impact from overspill carpark on nearby residential properties and the moving of the recycling centre to accommodate the new overspill car park
- Loss of established hedgebank and trees to create new pumping station access
- Housing layout, density and design not considered to be acceptable
- Traffic increase and highway safety
- Sewer capacity
- Local electricity sub-station is already nearly at capacity
- School is at capacity and the proposed development should not be built so close to the facility
- Light pollution impact
- Traffic assessment needed and visibility sight lines queried
- No need for proposed workshop structure

The majority of the objections are addressed in the main body of the report, however, the following comments are made in relation to objections not covered:-

- In respect for the need and amount of affordable housing Planning Policy Wales 10, which states at para 4.2.25 that *'A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications . Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers'*. This development would meet a proven need for affordable housing to serve the Community Council area.
- In respect of the concern in relation to light pollution, if the application were recommended for approval it would be subject to a condition requiring a lighting scheme to be submitted to and agreed in writing by the local planning authority.
- The most recent Pembrokeshire County Council's Admissions to Schools information confirms that there is capacity for 86 pupils, with the current number on the roll being 59. The development would, therefore, not be considered to result in unacceptable pressure on the local school.
- If the caravans were considered acceptable a condition could be attached to any permission granted to ensure that the caravans are not used as permanent residences.
- The majority of the proposed properties are to be provided by a registered social landlord who would assess the viability of a scheme prior to progressing it.

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 07 - Countryside
LDP Policy 08 - Special Qualities
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 53 - Impacts on traffic
PPW9 Chapter 04 - Planning for Sustainability
PPW9 Chapter 05 - Conserving and Improving Natural Heritage and the
Coast
SPG05 - Sustainable Design
TAN 12 - Design

Constraints

LDP Allocation
LDP Mineral Safeguard
LDP Open Space
Historic Landscape
Potential for surface water flooding
LDP Centre:50pc aff housing;30 units/ha
Recreation Character Areas
Affordable Housing Submarkets

Officer's Appraisal

Description of Development and Site

The application seeks planning permission for the following:-

- 14 No. Affordable housing units
- 2 No. Open market houses
- Upgrading of existing caravan park from 70 seasonal touring pitches and 15 tents pitches to 85 year round static caravans
- New sewage pumping station

The proposed affordable housing will be comprised of a mixture of 2, 3 and 4 bedroom two storey houses and 1 and 2 bedroom bungalows, with associated car parking and gardens. Access to the site will be gained via the highway to the west.

The proposed 2 open market dwellings will comprise 2 No. 2 bedroom bungalows with associated car parking and gardens. Access to the site will be gained via the entrance to the 14 affordable houses off Station Road.

The upgrading of the caravan park proposes changing the existing permissions on the site from 70 tourers and 15 tents to 85 static caravans, with associated landscaping.

A sewerage pumping station is also proposed along the northern boundary of the caravan site and access to this will be gained via a proposed separate access point directly off the highway.

The application site is a long established caravan site located on the eastern flank of Station Road running north toward Manorbier Station. The caravan site area straddles the Rural Centre boundary, as defined by Policy 6 of the Local Development Plan, with the eastern part of the site (the caravan and camping site) falling in the open countryside.

Relevant Planning History

NP/18/0700/FUL – Proposed winter storage of 35 touring caravans from 28th September to 28/29th February in any year in addition to and on the same site as existing planning permission NP/13/0260 for 35 touring caravans – Refused 16th January 2019

NP/18/0643/FUL – Vary condition 2 and remove condition 5 of NP/15/0526/FUL to allow for restaurant at first floor level – Refused 15th January 2019

NP/18/0559/FUL – 14 affordable housing units, 2 open market houses and upgrading 85 tents and tourers to 85 static caravans with associated landscaping and roads including new pumping station – Refused 23rd January 2019

NP/18/0543/DOC – Discharge condition no's 2 & 5 of NP/17/0258/FUL – Refused 25th October 2018

NP/18/0212/DOC – Discharge condition no's 2, 3 & 6 of NP/17/0229/S73 – Discharged 30th July 2018

An Environmental Impact Assessment (EIA) Opinion was sought prior to submission to ascertain whether an EIA would be needed to accompany the application. The opinion of the Authority was that an EIA was not necessary (NP/17/0221/SCO refers)

NP/17/0691/FUL - 14 affordable houses, 2 open market houses, 85 static caravans and pumping station – Withdrawn 5th June 2018

NP/17/0597/S73 - Variation of conditions 2 & 5 of NP/15/0526/FUL (Clubhouse) – Withdrawn 24 January 2018

NP/17/0596/CLE – Use of the south field as a touring & camping field for up to 140 touring caravans and tents at any one time on a seasonal basis for holiday purposes only from 1st March up to 28th September in any one year - Refused 27/11/2017

NP/17/0258/FUL - Retention of 35 hard standings and electric hook up points, temporary change of use of existing building as fish and chip shop and use of porta cabin as a temporary reception office. – Approved 9th August 2017

NP/17/0229/S73 – Vary condition no. 2 of NP/15/0526/FUL - Alterations to Clubhouse – Approved 9th August 2017

NP/17/0082/FUL – Retention of 35 hard standings and electric hook up points, temporary change of use of existing building as fish and chip shop and use of porta cabin as a temporary reception office, extend holiday season and winter storage - Refused 10th April 2017

NP/17/117/NMA – Non material amendment alteration in fenestration material – Approved 8th March 2017

NP/17/171/NMA – Non material Amendment – Increase in height of building – Withdrawn 6th April 2017

NP/16/0502/FUL – Amendment to NP/15/0526/FUL comprising change of use of first floor staff/managers accommodation to guest rooms and alterations to clubhouse - Withdrawn 6th February 2017

NP/15/0526/FUL – New Club House – Approved 16th December 2015.

NP/15/0131/FUL - 35 No. Caravans for winter storage in the western field - 10th January – 28th February - Approved 3rd June 2015

NP/13/260/CLE - 35 No. touring caravans or tents in the northern field – 1st March – 28th September – Granted 8th August 2013

NP/464/93 – Use of site for 35 touring caravans and 15 tent pitches between – Approved 1994

Key Issues

The application raises the following planning matters:

- Policy and Principle of the Development
- Visual Amenity and Special Qualities of the National Park
- Neighbouring Amenity
- Highway Safety
- Biodiversity
- Drainage

There has been extensive pre-application discussion by your officers with the agent and landowner and the housing association regarding the principles of such an application. Your officers considered there was potential to release an allocated housing site, provide long term environmental gains through the development of strategic landscaping and improved sewerage for the settlement. However, such a proactive and holistic planning solution requires a negotiated package – including land allocation, timing and construction phasing, all which would require legal agreements to secure the planning gains. Although this potential remains, your officers have concluded it is not realised in the form of this present application and must recommend refusal accordingly.

Policy and Principle of the Development

The application proposed a mixed development with two main elements, housing and the redevelopment of the caravan park to accommodate 85 year round static caravans.

Housing

The application site is partly located in Manorbier Station - a defined Rural Centre within the Local Development Plan (LDP), the application site forms part of an allocated site for mixed use purposes as part of the strategic aims of the plan. The aims of Policy 6 – Rural Centres are to a) to meet the housing, in particular affordable housing needs, b) to encourage small scale employment developments and c) to protect and enhance the Centre's range of facilities.

The application site is partly located on an LDP allocated site for a mixed use development (Allocation reference: MA895). The allocation is for residential (15 units) and educational purposes. The application proposes a mixed use of residential and tourism, which is not strictly in accordance with the allocation, however no proposal from the school has come forward in the lifetime of the LDP.

Policy 45 – Affordable Housing requires the provision of affordable housing units on each allocated site. In this instance the required affordable housing contribution amounts to a provision of 45% on site contribution, however the development proposes 87% of the housing proposed to be affordable, as such, the development is considered to comply with Policy 45 of the LDP and the Authority's Supplementary Planning Guidance on Affordable Housing (November 2014).

It is considered that the increase in housing density of the development in comparison to the housing numbers as set out in the LDP allocation (i.e. 15) is not significant and can be accommodated on the site. Consequently the housing element of the development – in principle – would be acceptably sited within the Rural Centre.

The application proposes 14 affordable housing units and 2 open market units. The site is located within a Rural Centre and on a site already allocated for housing provision, as defined by the adopted LDP, and the established principle of housing at this location has therefore already been examined and accepted.

Caravan Park

The planning position for this site following the grant of planning permission in 1994 (NP/464/93) is that the site has planning permission to accommodate 35 touring caravans and 15 tent pitches not between the period of 10th January and 28th February in any one year.

In 2015 planning permission was granted for the winter storage of 35 No. touring caravans on the site, where the housing is proposed, between the period of 10th January and 28th February in any one year.

A certificate of lawfulness was granted by the Authority in August 2013 (NP/13/0260 refers) which allowed the provision of an additional 35 touring caravans on the north field between March and September in any one year. The grant of a certificate for 35 touring units is not a permanent use of the land but is a material consideration. As a result there is approval for a maximum of 70 seasonal touring caravans and 15 seasonal tents on the site during the months of March – September. Outside of these months there should be no more than 35 caravans on a restricted part of the site at any one time. The Authority has served a Breach of Condition notice on the landowner as these numbers have been breached and the land-use is currently compliant with the notice.

Local Development Plan policies 35, 38 and 39 deals specifically with caravan sites and the provision of amended or altered pitches.

Policy 38 makes clear that new camping sites or the extension of existing sites by an increase in the number of pitches or enlargement of the site area will not be permitted. It states, however, that 'exceptionally' static caravan and chalet sites may be enlarged where this would achieve an overall environmental improvement for the site and its setting.

Although the site is not being spatially enlarged, the replacement of seasonal touring pitches with static caravans all year round is essentially an application for an increase in numbers throughout the year. Consequently, the application is considered to be contrary to Policy 38 of the LDP, notwithstanding that the application makes some provision for environmental improvements, which is discussed in the Visual Amenity and Special Qualities of the National Park section of the report below.

In certain circumstances the Authority has permitted a change over from touring caravan to static pitches where the number of overall units has reduced and where environmental improvements have been made to help reduce the overall impact of the site. In this instance, however, as the

proposal seeks to exchange 85 seasonal touring and camping pitches for 85 year round static pitches, there is no environmental benefit by means of a reduction in numbers and in fact the provision of 85 static caravans would result in an intensification of the use of the site, contrary to the aims of the LDP.

Policy 39 is also applicable to the proposed development as it refers to the upgrading of 'touring sites'. Policy 39 states that the upgrading of touring caravan or tent pitches to other forms of self-catering accommodation will be permitted, where: a site lies within a Centre; **and** the proposal forms part of a rationalization scheme that will result in environmental benefits in terms of layout, design and materials used; **and** the proposal complies with policy 35 (c) (Visitor Economy).

The caravan site element of the application falls outside of the Rural Centre of Manorbier Station and, as such, is contrary to Policy 39 notwithstanding that the application makes some provision for environmental improvements, which is discussed in the Visual Amenity and Special Qualities of the National Park section of the report below.

Having regard to the above the proposed development would be contrary to the requirements of the Local Development Plan policies 38 & 39. Consequently, the proposed replacement of 70 seasonal touring pitches and 15 seasonal tent pitches with 85 year round static pitches is not considered acceptable in principle.

Visual Amenity and Special Qualities of the National Park

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. Particularly relevant to this application area priority a) sense of remoteness and tranquility is not lost and wherever possible enhanced and c) pattern and diversity of the landscape is 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 application site lies within Landscape Character Area 4 (Manorbier/Freshwater East) as defined by the Landscape Character

Assessment (LCA) Supplementary Planning Guidance (SPG). The area's special qualities are listed in this document, one of which is as follows:-

'There is a very strong historical and cultural sense of place here, which is very different from that encountered in north and west Pembrokeshire, typified by the Medieval open field system which has survived remarkably well in the area - the stripfields which lie either side of the Ridgeway between Lamphey and to the south of St Florence. The wealth of historical and archaeological sites documented means that extensive areas of historic landscapes have an outstanding value attributed to them. Of particular note are the medieval buildings: the Lamphey Bishop's Palace, a moated house site at Hodgeston and the extremely well preserved manorial landscape of Manorbier, with its imposing castle dominating the village scene, the prominent church and a dovecote. The historical value in turn supports'

Within this LCA caravan sites and modern housing are noted as visual detractors and management guidelines include measures to improve the integration of tourism development into the landscape and regular cyclical management of hedgerows.

The area also lies within LANDMAP Visual and Sensory Aspect Area PMBRKVS059 evaluated as Moderate, and within Historic Landscape Aspect Area PMBRKHL46082 evaluated as Outstanding for its prehistoric/medieval strip fields. However, it is noted that the site does not lie within the strip field system or include traditional stone faced Pembrokeshire hedgebanks.

Natural Resources Wales (NRW) advise that the site is of high sensitivity, lying as it does within the National Park and comprising open fields and hedgerows, though with touring caravans and tents during the summer months. This would change to permanent housing and static caravans, roads and hard surfacing. It is considered that the impact on the site to be major/moderate adverse, reducing with time as landscape mitigation takes effect if approved. Beyond the site, effects on LCA 4 are considered minor in the submitted appraisal but NRW consider these to be likely moderate in the locality of the site, reducing to minor at distances of approximately 1.5km from the site.

They also consider the proposed development to result in some adverse impact on tranquillity, on distinctive settlement character and diversity of landscape. Increased numbers of residents and tourists along with increased traffic would reduce tranquillity to some extent. Although not of traditional village character, the settlement character would be further eroded by a large area of static caravans. The development of green fields with built development reduces landscape diversity.

The applicant has proposed a landscaping scheme in order to attempt to provide some mitigation against the visual impact of the proposed 85 static caravans. This is an environmental improvement although it is not considered sufficient to address the policy conflicts.

During the Pre-application Consultation NRW had been consulted and advised that any further planning application should be accompanied with a Landscape Assessment of the scheme. A Landscape and Visual Statement (LVS) has now been submitted in support of the planning application and officers have visited the site and surrounding landscape with NRW officers to assess this document and consider the proposed development.

NRW has responded formally and indicated that they still have significant concerns regarding the detrimental landscape impact of the proposed development. They consider that the landscape and visual effects have been underestimated to a degree and remain concerned regarding the scale of the development and its impact on the National Park landscape.

It is noted that the submitted LVS included photos which have not been produced in accordance with Landscape Institute Technical Guidance on Visualisations. The photographs are of poor resolution and reproduced at small scale in an A4 document. Details of the photograph specifications are not provided. The visual impact in the field is greater than illustrated in the photographs.

The main views of the site and proposed development are from The Ridgeway and its slopes to the north, with some visibility at close range from Station Road and likely glimpses from the railway route into Manorbier Station. Whilst the site is of relatively limited visibility in the wider landscape, there are views, some of which are open from higher ground.

Dwellings and static caravans would be clearly visible above/through hedgerows and the new access roads created. Effects from viewpoints 1 and 2 are considered minor adverse and from viewpoint 3 moderate adverse. The overall effects on Station Road are likely to be Moderate adverse on completion, potentially reducing down to minor depending on acceptable mitigation and foliage in the summer months.

Viewpoint 4 adverse effects are considered moderate in the submitted report however; the site is clearly visible in this view and quite prominent and officers consider the adverse effects to be likely moderate/high.

The assessment of adverse effects is moderate adverse at viewpoint 7 and indicates that there are further glimpses as the road to Manorbier Station descends the Ridgeway here. Officers also agree with this assessment of minor adverse effects from viewpoints 6 and 8 where part of the southern area of the site and development would be visible. There would also potentially be some views from properties on elevated slopes to the north such as Sunny Hill and Shipping Hill Farm.

Whilst the site boundaries comprise hedgebanks with trees which are mainly to be retained, many of these boundaries are thin with lots of gaps and provide very little screening in the winter months. It is unclear why mounding within the site is required and details of this feature and re-grading within the site are required for full consideration if permission were to be granted. Some

trees have already been pruned / removed during a recent site visit and sections of hedgerow would require removal for the two new access points.

In terms of landscaping, the application proposes some increase to the screen planting around the caravan site boundaries, some central planting areas, a planting bund and a wildlife area with the aim of improving the environment of the site and its setting in the surrounding landscape. The majority of the existing trees and hedges to the site boundaries are to be retained with the removal of 25m of roadside hedge for access to the proposed pumping station.

However, a large proportion of the planting proposal is for small low growing trees and shrubs, which will not provide sufficient screening of the caravan site. There are some large growing species proposed, but it is not considered that the landscaping proposed would be sufficiently significant and beneficial as to address the policy position.

In terms of the impact of the development on the wider setting, it is considered that the proposal to allow 85 static caravans in place of seasonal touring and tent pitches would result in a large extension to the built form of the existing village, outside of the rural centre, to the detriment of the rural character of the area.

Furthermore, the Landscape Character Assessment for the area identifies caravan parks as one of the discernible landscape trends in the area and states that caravan parks have eroded the visual quality in places. By allowing the proposed replacement of the seasonal touring caravans with 85 year round statics in the formation proposed, the development will further erode the visual quality of the area.

The proposed static caravans will measure 12.76m in length by 3.64m in width and reach a maximum height of 3.24m. Each caravan will have a private deck area and will be finished with aluminum cladding, UPVC glazing, and onduline pantile roof. Limited information in respect of colours has been submitted, however, this detail could be addressed by a suitable condition. It is noted that the caravans proposed do not include any renewable energy features.

The development would result in 85 year-round static caravans which, due to their position, layout, design and materials will be highly prominent in the landscape when travelling from the north along the Ridgeway, to the detriment of the special qualities of the National Park and the immediate visual amenities of the area.

The Roadside hedgerow in particular is considered to be a strong feature in the landscape and the loss of this as a result of the development has not been mitigated for on the proposed landscaping plan.

In respect of the housing, this element is located on an area which is currently used for caravans all year round (winter storage area) and is within the built

form of Manorbier Station, as such, the proposed houses are not considered to have an adverse impact on the wider landscape. In terms of design the houses are traditional in form and materials and additional landscaping could be dealt with by means of conditions.

In respect of the pumping station, the details submitted indicate that there will be a significant amount of hard standing proposed together with boundary fencing, there is the potential that this would have a detrimental urbanising visual impact on the rural character of the area.

Having regard to the above, the proposed development is considered to include insufficient overall environmental improvements to mitigate against the adverse effect on visual amenity and the special qualities of the National Park, contrary to LDP policies 8, 15, 35 & 38.

Neighbouring Amenity

Policy 30 of the Local Development Plan refers to matters of amenity, and requires proposals to be appropriate to where people live and work, compatible with its setting, should not lead to an increase in traffic, odour, noise or light, and should not be visually intrusive.

The application proposes a residential development which would generate some amount of noise, however, the residential noise associated with these 16 dwellings on an allocated site is not considered to be so significant as to warrant refusal of the application.

In respect of the 85 static caravans, again these would be year round caravans and some increase in noise would be expected. However, this noise again would be similar to residential noise and is not considered to generate an unacceptable level of noise.

In respect of the amenity of future occupiers of the dwellings they have been designed so as to ensure there is no adverse overlooking, overshadowing or dominance. Whilst the gardens are modest in scale they are considered to be proportionate to the scale of the dwellings proposed, which are also modest.

Having regard to the above the proposed development is considered to be acceptable in terms of amenity and to comply with policy 30 of the LDP.

Highway Safety

The objections received raised concerns in respect of highway safety and the need for a traffic assessment.

The application has been assessed by the Highways Authority which considers that the proposed change to static caravans will not lead to an increase in peak traffic generation from the site and there will be a highway safety benefit of a reduction in touring caravan movements on the approach roads.

In respect of the proposed housing, existing site access and the pumping station entrance the Highway Authority has raised no objection to the development in terms of highway safety subject to a condition requiring detailed plans of the access roads including levels, gradients and disposal of surface water. The submission of a Construction Phase Traffic Management Plan will also be required to agree details of vehicle sizes, movements for deliveries, routes, timing to avoid peak activities and measure to maintain road safety. Other conditions would cover works within the site in respect of access and parking etc.

Biodiversity

Policy 11 refers to the protection of biodiversity, and requires that development that would impact on habitats and species will only be permitted subject to suitable mitigation. The application was submitted with an Extended Phase 1 Ecological Survey covering part of the site which found that there was likely to be no adverse impacts on protected species but was out of date as reports are only valid for two years and also did not cover the entire site. An updated ecology report has now been received which addresses the date aspect, but the updated survey report does not cover the entire site and has omitted the allocated housing site area.

Ecological surveys are required to ensure that all protected species, habitats and invasive species are identified and mitigated for, buffered and/or removed appropriately. The area to the West, which is proposed for housing, has not been included within the submitted ecological report, and there is therefore insufficient evidence to provide confidence that there will be no negative ecological impacts upon this area. The roadside hedgerow itself is of biodiversity interest and has not been assessed for its potential to support protected species.

In summary, there is sufficient information within the ecological report to cover the area to the East which is proposed for static caravan units. However, an ecological appraisal of the area to the West, proposed for housing, is still required. This information must be provided prior to the issuing of any planning consent and the lack of provision forms a reason for refusal.

In addition to the above requested information both a lighting plan for the entire site (including street lighting and external household lighting) and a biodiversity enhancement and management scheme would also be required for this application. Both of which could be made a condition should permission be granted.

Drainage

Policy 29 of the LDP requires all development proposals to be well designed in terms of water and drainage (criterion 'h'), Policy 32 requires development proposals to incorporate sustainable drainage systems for the disposal of surface water on site.

The Drainage Department at Pembrokeshire County Council was consulted as part of the application and has raised no objection to the proposal in respect of surface water drainage subject to a note to advise the applicant that separate consent would be required through the Sustainable Drainage Approval Body (SAB) at Pembrokeshire County Council.

In respect of foul water drainage the application proposes a pumping station to the north western boundary of the site, which will be served by its own separate access, and will serve both the proposed static caravan site and the housing development. Welsh Water /Dwr Cymru have assessed the scheme and have no objection subject to conditions.

Conclusion

The proposed development has been considered against the policies of the adopted Local Development Plan and it is considered that the development would result in an insensitively and unsympathetically development within the National Park to the detriment of the rural landscape and the special qualities of the National Park.

Whilst, certain elements of the development are acceptable, the proposed change from 85 seasonable touring caravan and tent pitches to 85 year round static caravan pitches is contrary to Policies 38 and 39 of the LDP which indicate that no extensions to existing caravan sites will be permitted and that touring caravan sites should only be upgraded where they lie in a rural centre. This conclusion is reached notwithstanding attempts to incorporate environmental improvements. The provision of housing via an allocated site, and in particular the delivery of affordable housing is not considered sufficient to outweigh the identified harms and policy conflicts. No other material considerations have been put forward which would be considered to outweigh the clear policy position set out the adopted LDP and as such, the application cannot be supported.

Recommendation

REFUSE, for the following reasons:

1. The proposal to increase the use of the pitch numbers on site by allowing 85 year round static caravans on a site located in a countryside location will result in an adverse impact on the landscape and the special qualities of the National Park, which is contrary to policies 8, 15, 35, 38 & 39 of the Local Development Plan.
2. Policies 1, 8 and 15 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 is insensitively and unsympathetically sited within the landscape and visually intrusive. The proposed development

forms 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 policies 1, 8 and 15 of the adopted Local Development Plan Policy and Supplementary Planning Guidance on Landscape Character Assessment.

3. The application fails to provide for affordable housing in perpetuity through the provision of a suitable section 106 agreement. The application therefore fails under 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, 2018).
4. Policy 11 of the Pembrokeshire Coast National Park Local Development Plan seeks to ensure development does not disturb or otherwise harm protected species or their habitat or the integrity of other habitats, sites or features of importance to wildlife and individual species including Local Biodiversity Action Plan species and habitats. Development will only be permitted where the effects will be acceptably minimised or mitigated through careful design, work scheduling or other measures. Insufficient information has been submitted in respect of a full ecological survey for the entire site which prevents officers from considering any impact on ecological species or habitat from the proposed development scheme.



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MP 19 5 22

REV D NEW PLANNING APPLICATION 06/08/2019	DATE	30/03/2017
REV A AMENDED AS PER MEETING WITH PCNPA 06/12/2017	REVISION/DATE	06/12/2017
PROPOSED SITE REDEVELOPMENT AT	PROJECT NAME	CHALKMAN PARK, STATION RD.
CHALKMAN PARK, STATION RD.	SURFER	M/S
MANAGER	SCALE	1:500
	DATE	06/12/2017
	BY	G. BLAINE
SITE PLAN AS EXISTING		

DCM/MS
 6' trunk water main with 6 metre wide exclusion zone.
 200mm public-rainp mesh with 6 metre wide exclusion zone.

GERALD BLAINE
 ARCHITECTURAL & PLANNING CONSULTANTS
 15 St Johns Street, Walsand, Co. Down BT43 7JN
 T: 01994 240366 M: 07870 420322

DO NOT SCALE

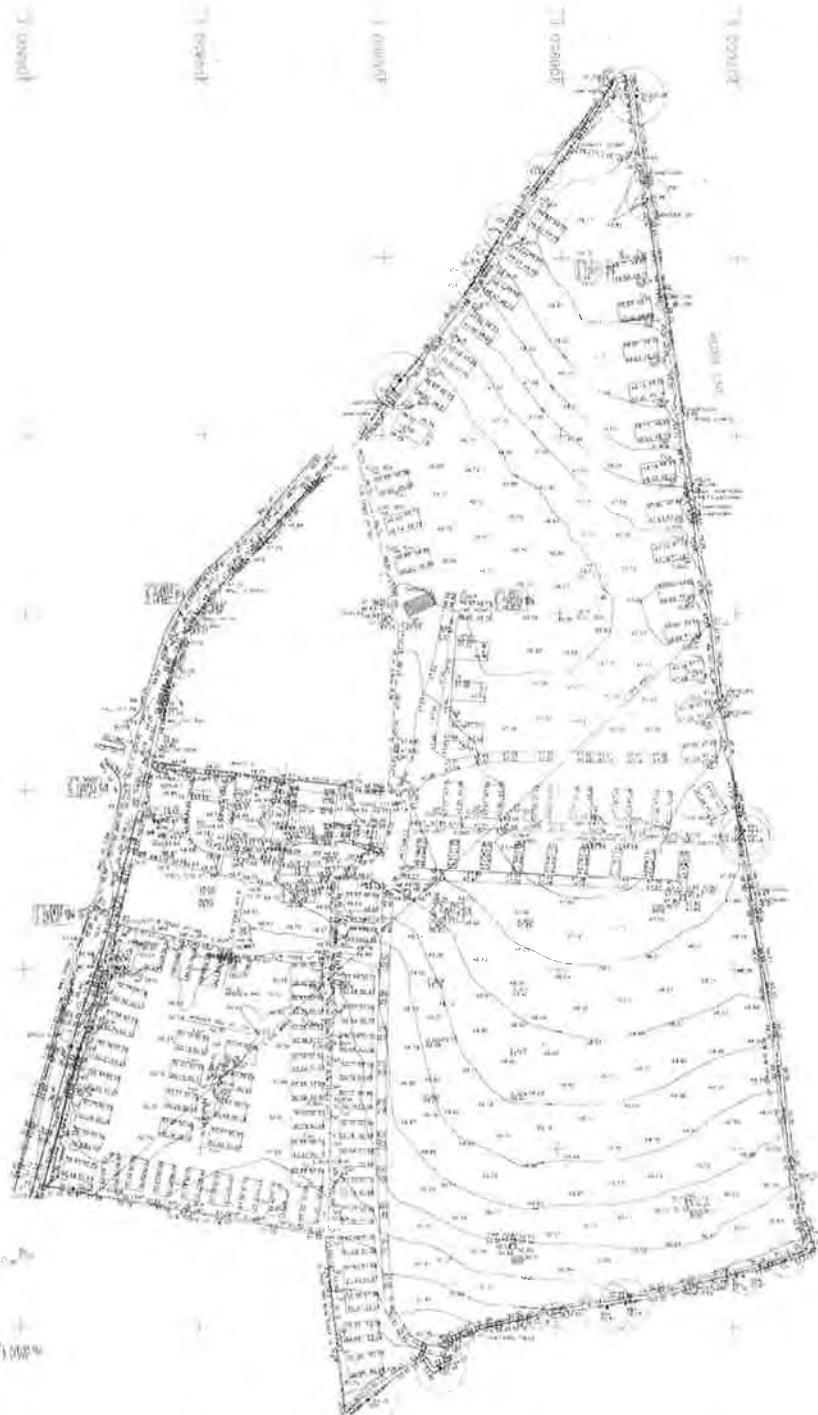
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WORK TO PROVED DIMENSIONS IN PREFERENCE TO SCALES.

THE DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER ROGER CASEY ASSOCIATES DRAWINGS AND SPECIFICATIONS AND ALL OTHER CONSULTANT'S DRAWINGS AND SPECIFICATIONS RELATING TO THIS PROJECT.



NP 19 5 2 2

- 1 OCT 2019

SURVEY



Roger Casey Associates
 Consulting Civil & Structural Engineers

11, Marston 6 Marston Street,
 Cambridge CB21 1BQ
 T 01223 722 646

Units 10 & 11, Merin Court,
 100 Longwalk Road,
 Pembrokeshire SA21 1BQ
 T 01437 732 775

E: office@rcs-eng.co.uk
 W: www.rcs-eng.co.uk

CLIENT:
PEMBROKESHIRE HOUSING ASSOCIATION

ARCHITECTURAL CONSULTANT:
GERALD BLAIN ASSOCIATES

PROJECT:
RESIDENTIAL DEVELOPMENT OFF STATION ROAD, MANORBIER, TENBY, PEMBROKESHIRE

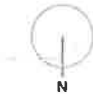
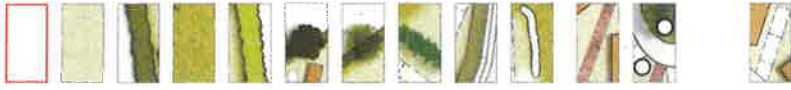
DRAWING TITLE:
EXISTING SITE SURVEY PLAN

DATE:	06/04/16
SCALE:	1:750
PROJECT NO.:	19381/01

<p>M.A.S. SURVEYORS Chartered and Registered Surveyors Chartered Measurement and Valuing Ltd. 10, GLEBE, TENBY, PEMBROKESHIRE, SA21 1BN Tel: 01437 65141 Fax: 01437 31140 www.masurveyors.co.uk</p>	<p>CLIENT: GERALD BLAIN LTD 14, ST ANDREW STREET MANORBIER PEMBROKESHIRE SA21 1BN</p>
	<p>SCALE: 1:750</p> <p>DATE: 01/10/2019</p> <p>DRAWN BY: J.S.</p> <p>CHECKED BY: J.S.</p>

TOPOGRAHICAL SURVEY OF STATION ROAD, MANORBIER, PEMBROKESHIRE.

ORIGINAL DRAWING AT
 Scale: 1:750
 Date: 06/04/16



Gaps are filled with whips native species of local provenance to improve wildlife corridor and enhance landscape character



Proposed trees on raised mound planted with bulbs and wildflowers



Proposed low level diffuse lighting at knee to hip height for wayfinding



Area with trees willow tunnels/seating/den and natural stone feature in keeping with the character of the National Park



Proposed gravel path loose old red sandstone gravel of local provenance to enhance pedestrian connectivity through wildflower shrub and tree planting in the norther part of the site



Proposed bug hotel and wildlife corner using dead and decaying wood evident in the existing boundary



Proposed recycling centre Removal of leylandii and replacement with native hedgerow and hedgerow trees intermittently planted



Attractive landscaped entrance with hedgebanks planted with native wildflower grasses and bulbs. In the open space fronting onto the entrance native trees and low level lighting will guide the line of sight towards focal point to proposed grove of native trees and the countryside beyond.



Proposed pumping station

Overflow carpark

Proposed workshop

New entrance from Station Road with hedge translocated on site in accordance with the Ecological Appraisal recommendations

Proposed Hedgerows

Proposed Trees

Proposed Hedge Planting

Latin Name	Common Name
<i>Ilex europaeus</i>	Holly
<i>Crataegus monogyna</i>	Hawthorn
<i>Daucus carota</i>	Wild carrot
<i>Artemisa maritima</i>	Thrift
<i>Digitalis purpurea</i>	Fogfane
<i>Antirrhinum sylvestris</i>	Cow parsley
<i>Leucanthemum vulgare</i>	Oxeye daisy
<i>Liriodia ulgaris</i>	Common toadflax
<i>Umbilicus rupestris</i>	Nardwort
<i>Hedyscys sylvatica</i>	Hedge woundwort
<i>Viola hirta</i>	Spacious field foxtail
<i>Primula vulgaris</i>	Primrose
<i>Quercus agrifolia</i>	Burdock trefoil
<i>Silene dioica</i>	Red campion

Latin Name	Common Name
<i>Ilex aquifolium</i>	Holly
<i>Malus sylvestris</i>	Crab apple
<i>Crataegus monogyna</i>	Hawthorn
<i>Corylus avellana</i>	Hazel
<i>Cornus sanguinea</i>	Dogwood
<i>Sambucus nigra</i>	Elder
<i>Elaeagnus argentea</i>	Wood Spurge
<i>Viburnum opulus</i>	Guelder Rose

Latin Name	Common Name
<i>Ilex aquifolium</i>	Holly
<i>Malus sylvestris</i>	Crab apple
<i>Crataegus monogyna</i>	Hawthorn
<i>Corylus avellana</i>	Hazel
<i>Viburnum opulus</i>	Guelder Rose
<i>Cornus sanguinea</i>	Dogwood
<i>Sambucus nigra</i>	Elder

Proposed Hedgerows

Proposed Trees

Proposed Hedge Planting

Proposed Hedgerows

Proposed Trees

Proposed Hedge Planting

client
Mr Damian Brown

project title
Buttyland Caravan and Camping Park, Manorbier

drawing title
Proposed Landscape Strategy

date
11 FEBRUARY 2020

drawing number
edp5474_0001c

scale
Refer to scale bar



NP 19 5 22

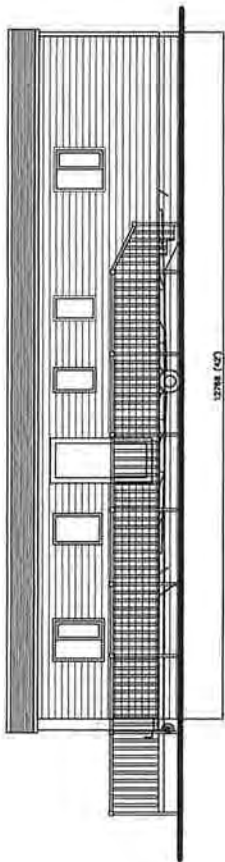
drawn by
JTF

checked
MD

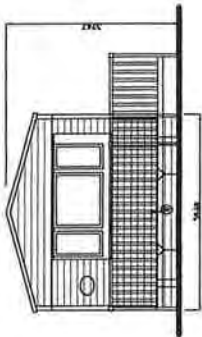
QA
CR

the environmental dimension partnership

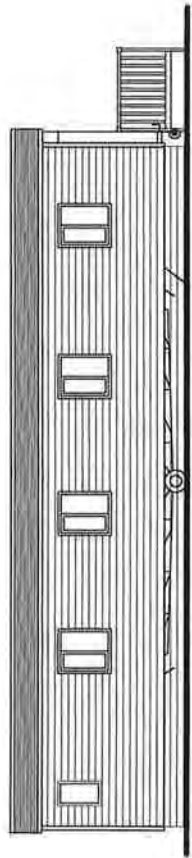
Registered office: 01285 740427 - www.edp-uk.co.uk - info@edp-uk.co.uk



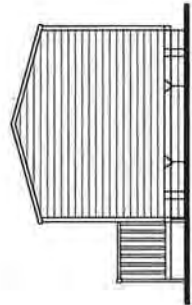
front elevation



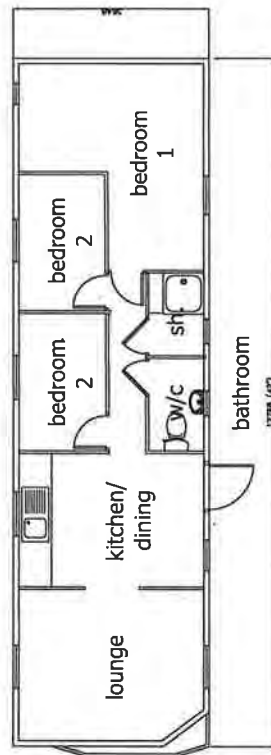
end elev.



rear elevation



end elev.



plan view 0 5m

- EXTERIOR**
- Onduline Pantile Roof
 - Domestic Gutters & Down Pipes
 - Painted Chassis
 - Pregalvanised Chassis
 - Fully Galvanised Heavy Duty Chassis
 - Aluminium Cladding
 - Extra Insulation
 - uPVC Double Glazing

Approved Building Control
 National Planning Authority
 - 1 OCT 2019
 Approved Building Control
 Approved Building Control

NP 19 5 2 2

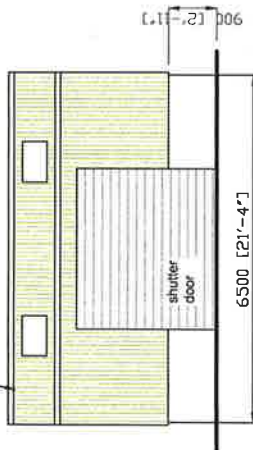
GERALD BLAINE
 ARCHITECTURAL & PLANNING CONSULTANTS

49 - 50 New Road, Chippenham, Wiltshire SN15 1JH
 15 St Johns Street, Whitland, Carmarthenshire SA34 0AN
 T: 01249 400800/01994 240366 M: 07970 420322

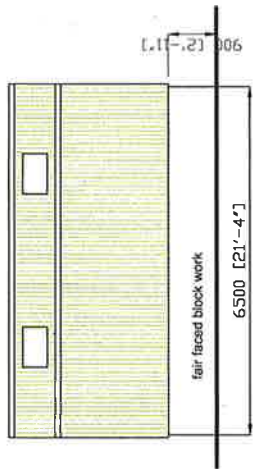
JOB: PROPOSED SITE REDEVELOPMENT AT BUTTYLAND CARAVAN PARK, STATION RD, MANDRIBER	DRAWING NO.: 049/2007/01	DATE: 18/05/2017
DWG. TITLE: STATIC CARAVAN (TYPICAL LAYOUT)	DRAWN BY: MS	CHECKED BY:
CLIENT: MR. D. BROWN/PHA	SCALE: 1/100	A3

17 19 5 22

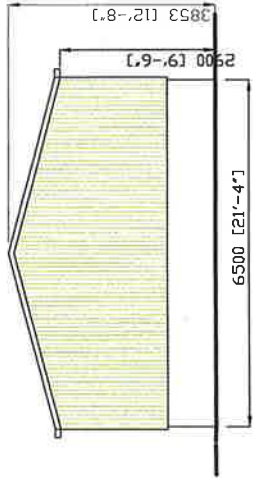
Single skin steel box profile (colour coated green)
with 4 no. rooflights



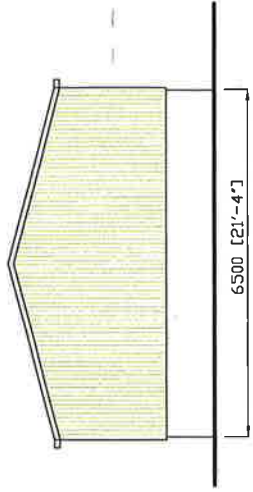
north elevation



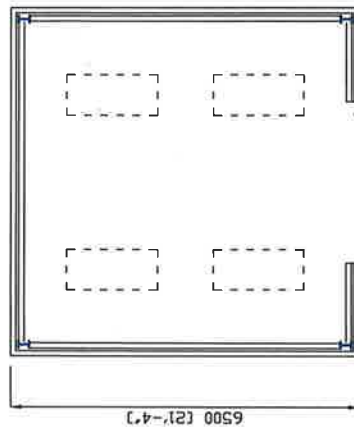
south elevation



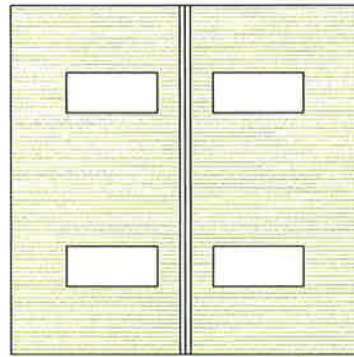
west elevation



east elevation



plan view

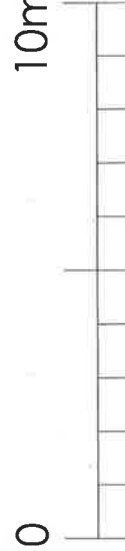


roof plan

Single skin steel box profile (colour coated green)
with 4 no. rooflights

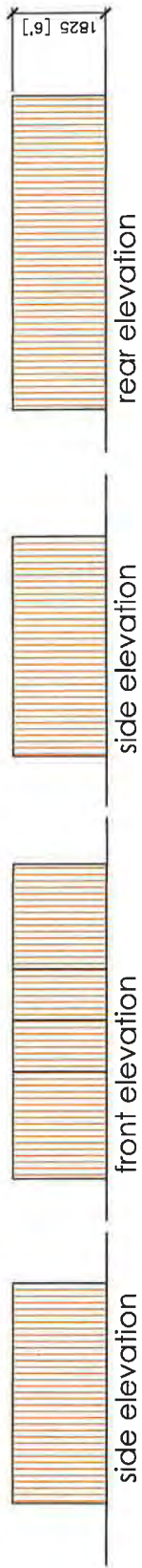


10metres



12 FEB 2020

JOB:	PROPOSED SITE REDEVELOPMENT AT BUTTYLAND CARAVAN PARK, STATION RD, MANDRIBIER	DRAWING-NO:	B 49/WORKSHOP	DATE:	23/03/2018
DWG. TITLE:	PROPOSED WORKSHOP	DRAWN BY:	MS	CHECKED BY:	
		CLIENT:	Mr D Brown	SCALE:	1/100
					A3

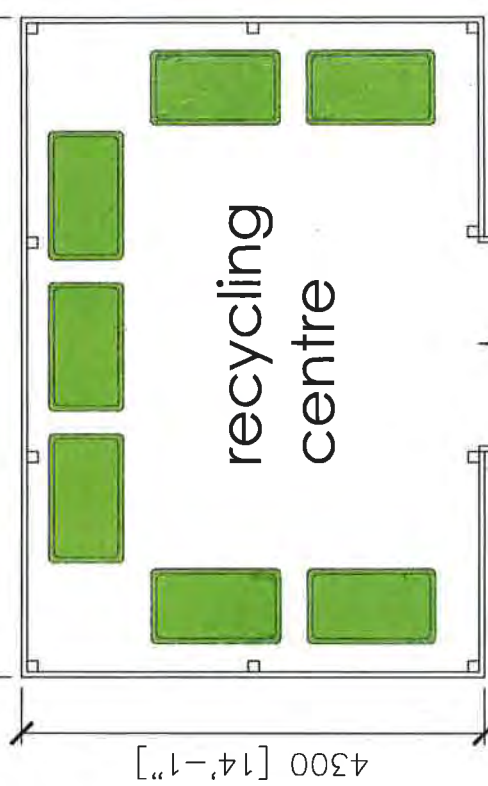


elevations - scale 1/100



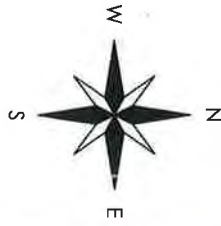
Proposed Recycling Centre
materials:
walls - stained timber close boarded fence
base - concrete

6150 [20'-2"]



4300 [14'-1"]

recycling
centre



19 5 22

12 FEB 2023

plan view - 1/50

5m



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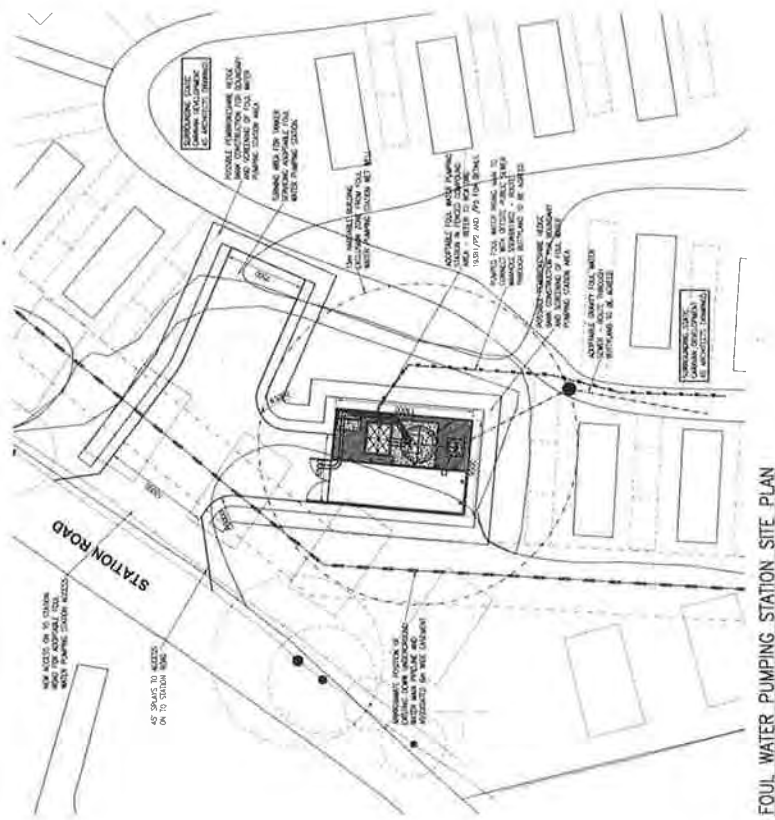
Client:	Mt D Brown
Scale:	1/50 & 1/100
Drawn by:	GENIAL
Checked by:	GENIAL
Date:	07/03/2020

PROPOSED SITE REDEVELOPMENT AT
 BUTYLAND CARAVAN PARK,
 STATION RD,
 MANDORBIER

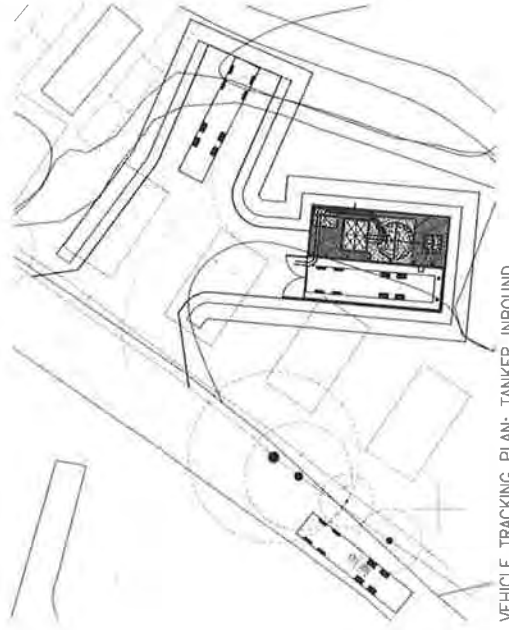
THE GENIAL 240 365
 Mob: 0770 423322
 Email: Genial@genialassociates.co.uk
 Address: 25 St John's Street, Whitland, SA30 5AM

Proposed Recycling Centre

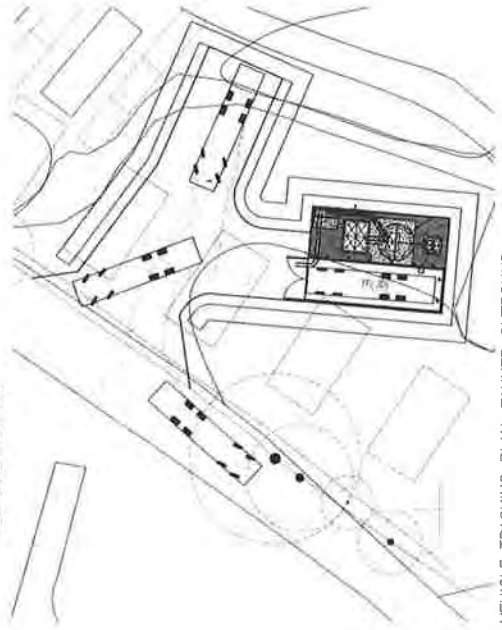
DO NOT SCALE



FOUL WATER PUMPING STATION SITE PLAN
SCALE 1:250



VEHICLE TRACKING PLAN: TANKER INBOUND
SCALE 1:250



VEHICLE TRACKING PLAN: TANKER OUTBOUND
SCALE 1:250

N 19 5 2 4



ORIGINAL DRAWING AT
SCALE 1:250
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NOTES

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WORK TO FIGURED DIMENSIONS IN PREFERENCE TO SCALING.

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER ROGER CASEY ASSOCIATES DRAWINGS AND SPECIFICATIONS RELATING TO THIS PROJECT. CONSULTANT'S DRAWINGS AND SPECIFICATIONS RELATING TO THIS PROJECT.

DATE: - 3 OCT 2019

PLANNING APPLICATION

Roger Casey Associates
Consulting Civil & Structural Engineers

7, Marine 5, Mansel Street,
Garmouth, Aberdeenshire SA31 1PX
T: 01267 222 846

Units 10 & 11, Marina Court,
Wood Lane, Pembroke,
Pembrokeshire SA31 1SR
T: 01437 762 795

E: office@rcasey.co.uk
W: www.rcasey.co.uk

PEMBROKESHIRE HOUSING ASSOCIATION
ARCHITECTURAL CONSULTANT
GERALD BLAIN ASSOCIATES

PROJECT: RESIDENTIAL DEVELOPMENT OFF STATION ROAD, MANORBIER, TENBY, PEMBROKESHIRE

DRAWING TITLE: ADOPTABLE FOUL WATER PUMPING STATION PLANS			
NO.	REVISED	DATE	BY
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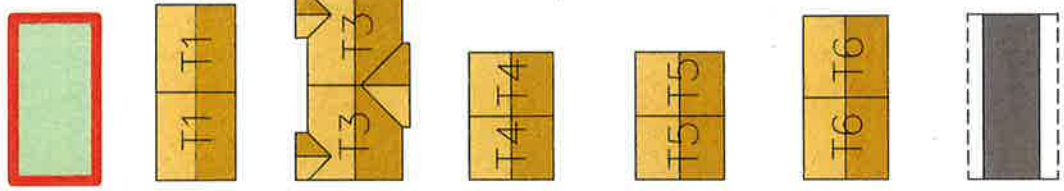
3 OCT 2019



NOTES:
 1/ FOR LANDSCAPING DETAILS SEE LANDSCAPING PLAN (SEPARATE).
 2/ FOR DRAINAGE DETAILS SEE DRAINAGE STRATEGY (SEPARATE)



LEGEND:



Land to be gifted to PHA

T1 6 no. 1b2p bungalow

T3 2 no. 2b3p semi-detached bungalow

T4 2 no. 2b4p semi-detached house

T5 2 no. 3b4p semi-detached house

T6 2 no. 4b6p semi-detached house

5.5m wide carriageway with 1.8m footway or verge

NP 19 5 2 2

REV B AMENDED AS PER MEETING WITH PCNPA 06/12/2017
 REV A AMENDED AS PER MEETING WITH PCNPA 06/12/2017

JOB:	PROPOSED SITE REDEVELOPMENT AT BUTTYLAND CARAVAN PARK, STATION RD, MANDORBIER	DRAWING NO:	849/100	DATE:	30/10/2017
DWG. TITLE:	AFFORDABLE HOUSING SITE PLAN	DRAWN BY:	MS	CHECKED BY:	
		CLIENT:	MR. D. BROWN/PHA	SCALE:	1/500
					A3

GERALD BLAINE

A S S O C I A T E S
 ARCHITECTURAL & PLANNING CONSULTANTS
 49-50 New Road, Chippenham, Wiltshire SN15 1FL
 15 St. Johns Street, Whitland, Carmarthenshire SA34 0AN
 T: 01249 400800/01994 240366 M: 07970 420322

ARCHITECTURAL & PLANNING CONSULTANTS
 - 1 OCT 2019
 Andrew Blaine Architects
 Affordable Housing



BUTTYLAND AFFORDABLE HOUSING STREET VIEW (N.T.S.)

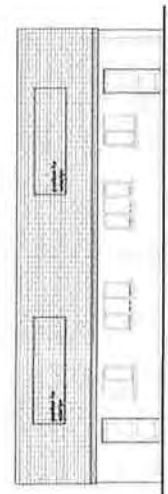
NP 19 5 2 9

GERALD BLAINE
 ARCHITECTURAL & PLANNING CONSULTANTS
 49 - 50 New Road, Chippenham, Wiltshire SN15 1HL
 15 St Johns Street, Whitland, Carmarthenshire SA34 0AN
 T: 01249 400800/01994 240366 M: 07970 420322

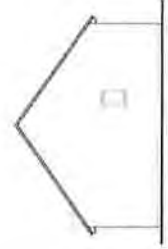
JOB: PROPOSED SITE REDEVELOPMENT AT BUTTYLAND CARAVAN PARK, STATION RD, MANDURBIER	DRAWING NO.: 849 - STREET VIEW	DATE: 30/10/2017
DWG. TITLE: AFFORDABLE HOUSING STREET VIEW AS PROPOSED	DRAWN BY: MS	CHECKED BY:
	CLIENT: MR. D. BRDWN/PHA	SCALE: NTS
		A3

EXTERNAL MATERIALS

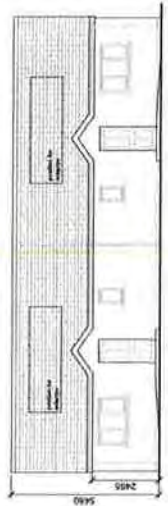
- Roof: Artificial slates with textured surface and dressed edges as SKY 'Cromleigh Textured', Welsh Blue colour.
- Ridge tiles: Terracotta.
- 27v verge system.
- Solar/PV panels where indicated
- Walls: Smooth sand/cement or traditional roughcast render & colour washed.
- Windows: White painted timber side-hung casements to approval.
- Doors: Composite stained timber doors.
- Rainwater goods: Black UPVC half round gutters and circular downpipes.



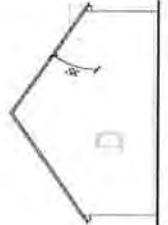
rear elevation



side elevation

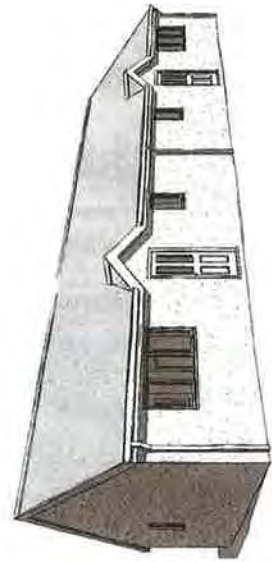


front elevation

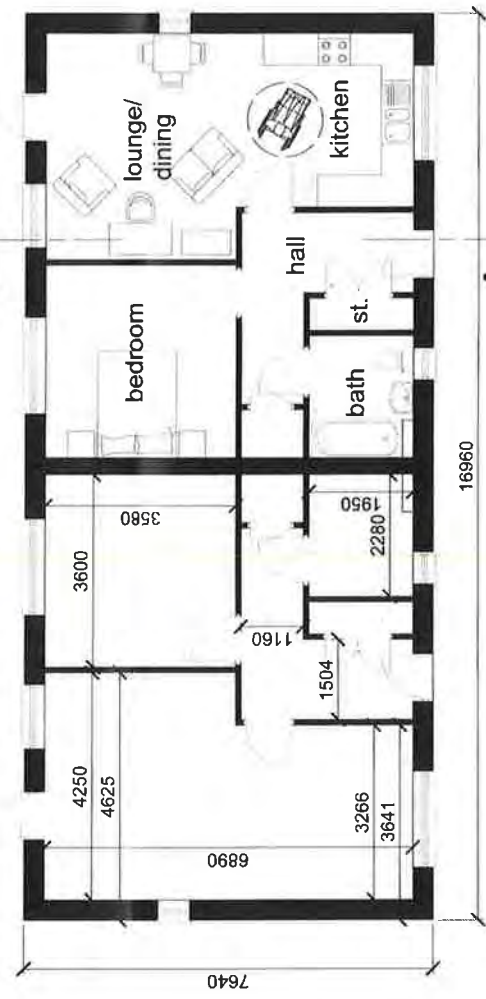


side elevation

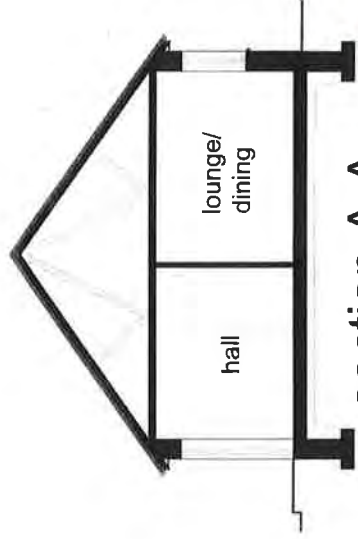
Elevations Scale 1/100



3D visualisation (n.t.s.)



ground floor plan



section A-A

5 10m

Plan & Section Scale 1/50

Type 1 - 1 bedroom 2 person bungalow - 6 no. Plots 5,6,7,8,9 &10



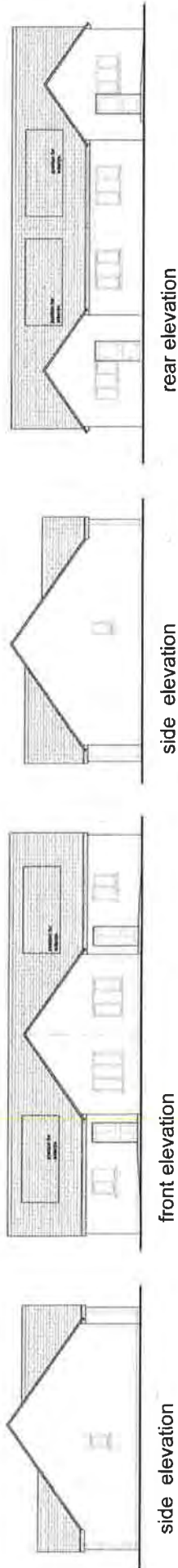
19 5 22

REV A AMENDED AS PER MEETING WITH PC/CHA, DN/12/2017

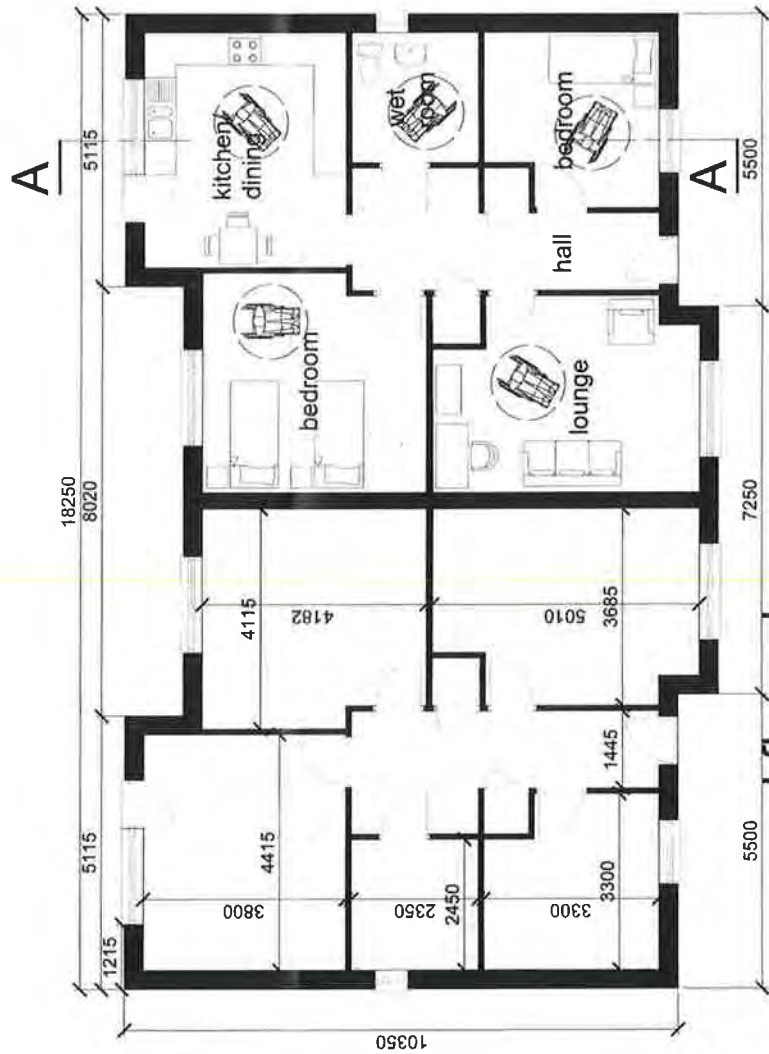


ARCHITECTURAL & PLANNING CONSULTANTS
18 St. John Street, Widdow, County Down, BT61 1AA
T: 028 9026 8100 E: gblaine@gb.co.uk

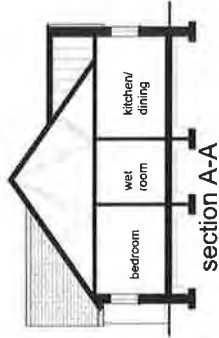
PROJECT: 18 St. John Street, Widdow, County Down, BT61 1AA	
DRAWING: 18 St. John Street, Widdow, County Down, BT61 1AA	
DATE: 03/10/2017	
DRAWN BY: GBL	
CHECKED BY: GBL	
SCALE: 1/50 & 1/100 @ A1	



Elevations & Section Scale 1/100



ground floor plan Plan Scale 1/50



section A-A



3D visualisation (n.t.s.)

EXTERNAL MATERIALS

- Roof: Artificial slates with textured surface and dressed edges as SVK 'Cromleigh Textured', Welsh Blue colour.
- Ridge tiles: Terracotta.
- Dry verge system.
- Solar/PV panels where indicated.
- Walls: Smooth sand/cement or traditional roughcast render & colour washed.
- Windows: White painted timber side-hung casements to approval.
- Doors: Composite stained timber doors.
- Rainwater goods: Black upPVC half round gutters and circular downpipes.



Nº 19 5 2 2

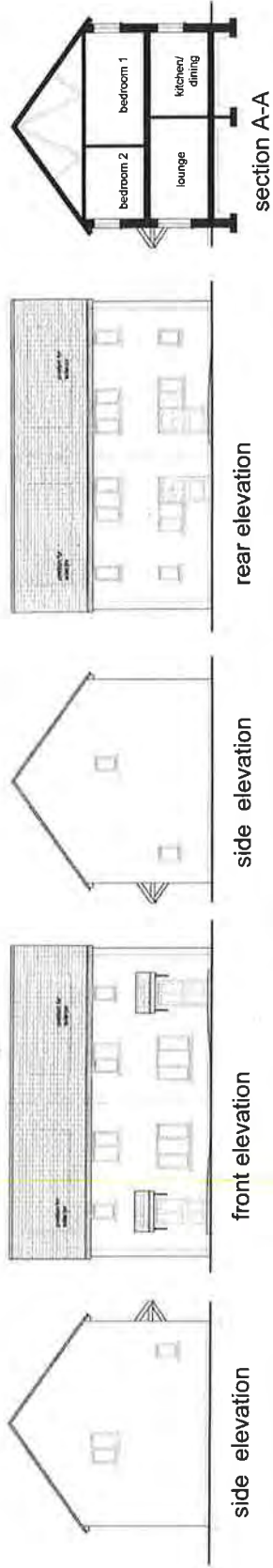
REVISED AS PER MEETINGS WITH PCNPA 06/11/2017

GERALD BLAINE
ARCHITECTURAL & PLANNING CONSULTANTS
15 St Ann's Street, Victoria, CARROTBOURNE, LANCASHIRE
T: 01524 800000 E: 01524 800000

A S S O C I A T E S

PROJECT NO:	190522
CLIENT:	PCNPA
DATE:	03/10/2018
PROJECT:	PCNPA
SCALE:	1/50 & 1/100 @ A1
PROJECT: 3 person bungalow 3 bedrooms, 2 bathrooms, 1 kitchen/dining area APPROXIMATE HOUSING TYPE	

Type 3 - 2 bedroom 3 person bungalow - 4 no. Plots 13 & 14



Elevations & Section - Scale 1/100

10m

0

5

10m

EXTERNAL MATERIALS

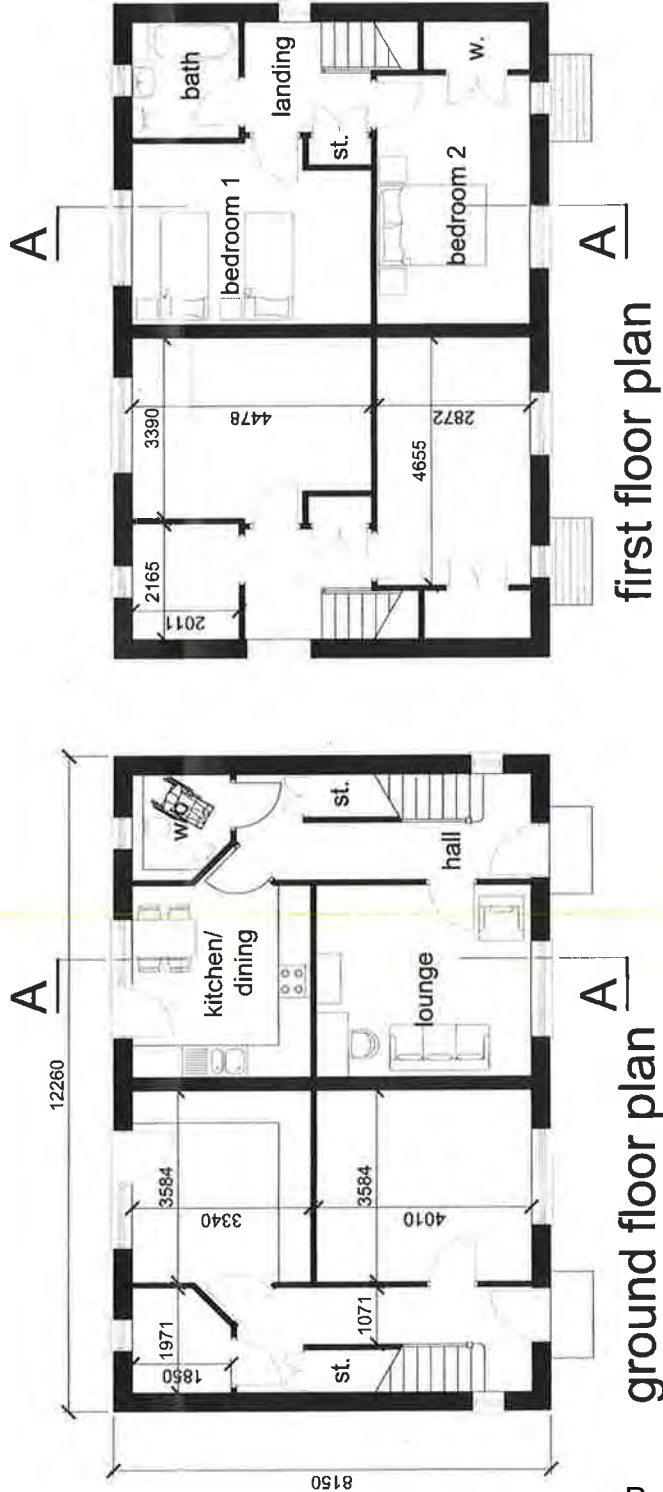
Roof: Artificial slates with textured surface and dressed edges as SVK 'Cromleigh Textured', Welsh Blue colour. Ridge tiles: Terracotta colour. Dry verge system. Solar/PV panels where indicated.

Walls: Smooth sand/cement or traditional roughcast render & colour washed.

Windows: White painted timber side-hung casements to approval.

Doors: Composite stained timber doors.

Rainwater goods: Black, UPVC half round gutters and circular downpipes.



ground floor plan

first floor plan

Floor Plans - Scale 1/50

0

5

10m



3D visualisation (n.t.s.)

REV A APPROVED AT MEETING WITH ZENIFA DB/1/25017
- 1 OCT 2018

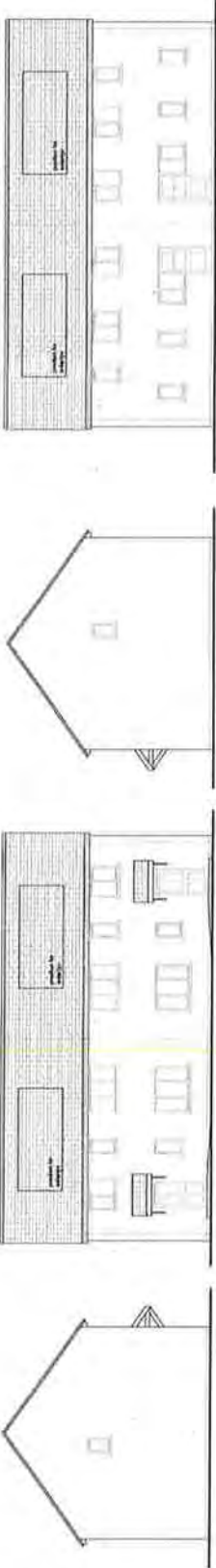
19.5.22

REV A APPROVED AT MEETING WITH ZENIFA DB/1/25017



ARCHITECTURAL & PLANNING CONSULTANTS
151, TOWN SQUARE, BIRMINGHAM, B2 4BN
TEL: 0121 633 0000 FAX: 0121 633 0003

PROPOSED SITE REDEMPTION AT MAYFIELD CHURCH PARK, STYFRON RD, MAYFIELD, BIRMINGHAM, B38 7NR	
DATE:	19.5.22
SCALE:	1/50 & 1/100 @ A1
PROJECT NO.:	03/17/2018
DESIGNER:	GERALD BLAINE
CHECKED:	GERALD BLAINE
DATE:	03/17/2018
SCALE:	1/50 & 1/100 @ A1

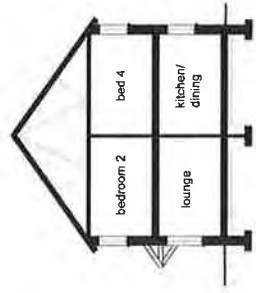


side elevation

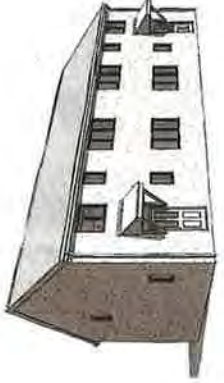
front elevation

side elevation

rear elevation

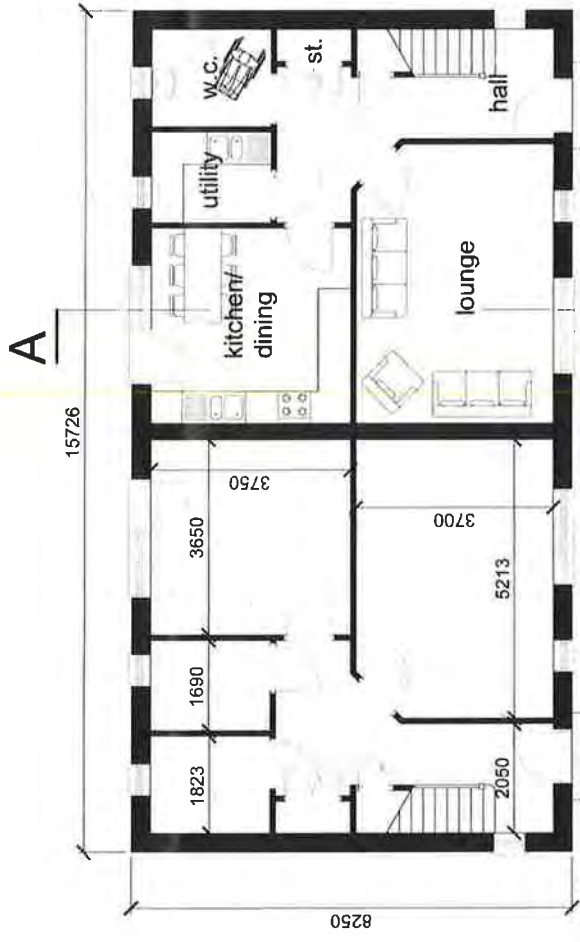


section A-A

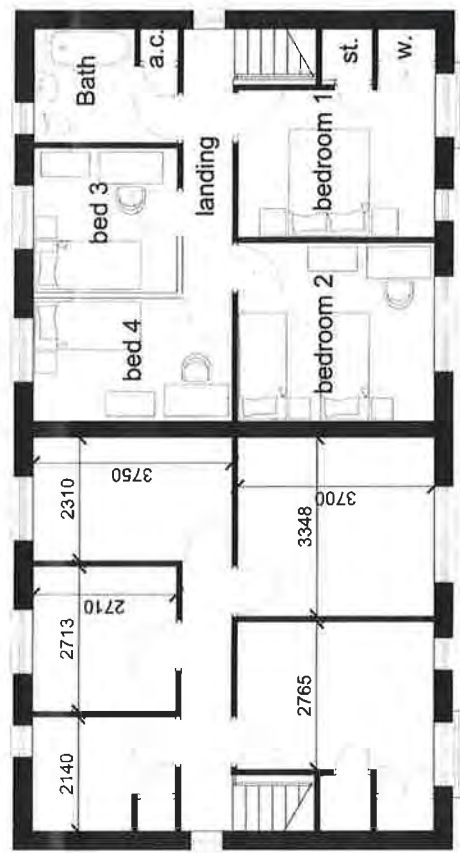


3D visualisation (n.t.s.)

Elevations & Section - Scale 1/100



ground floor plan



first floor plan

Floor Plans - Scale 1/50



Type 6 - 4 bedroom 6 person semi detached house - 2 no. Plots 3 & 4

EXTERNAL MATERIALS

- Roof: Artificial slates with textured surface and dressed edges as SVA 'Comleigh Textured'. Wash Blue colour.
- Ridge tiles: 'Terracotta'. Dry verge system. Solar/PV panels where indicated.
- Walls: Smooth sand/cement or traditional roughcast render & colour washed.
- Windows: White painted timber side-hung casements to approval.
- Doors: Composite stained timber doors.
- Rainwater goods: Black uPVC half round gutters and circular downpipes.



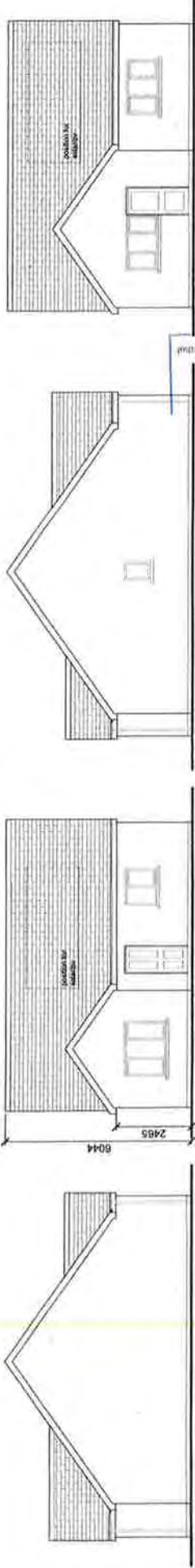
NP 19 5 2 2

REVISED AS PER MEETING WITH PCFPA 06/11/2017

GERALD BLAINE
 ARCHITECTURAL & PLANNING CONSULTANTS
 157 High Street, Exeter, Devon, EX1 1AA
 01392 26006 & 07791 43627

A S S O C I A T E S

Site:	PROPOSED SITE DEVELOPMENT AT MILLINGHAM CANAL PARK, BRATTON RD.
Applicant:	APPROVED: 15/06/2018
Plot No.:	TYPE 6 - 4 bedroom & person semi-detached house
Plans, Section and Elevations:	
Drawn by:	MB/ST
Checked by:	MB/ST
Date:	03/10/2018
Scale:	1/50 & 1/100 P.A.

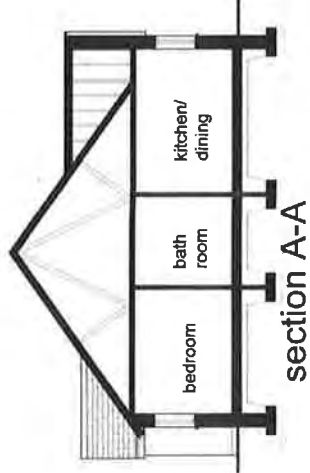


side elevation

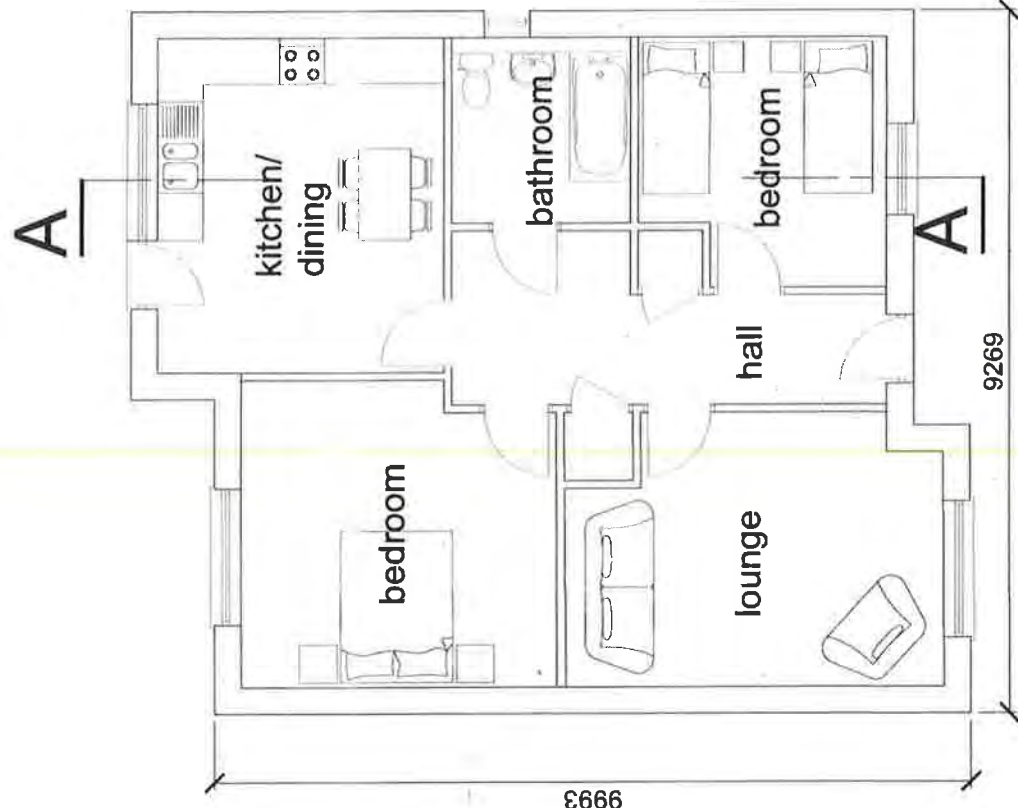
front elevation

rear elevation

Elevations & Section - Scale 1/100



section A-A

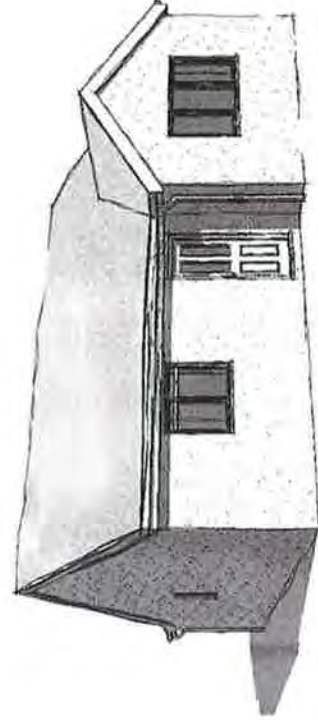


Floor Plan - Scale 1/50

EXTERNAL MATERIALS

- Roof: Artificial slates with textured surface and dressed edges as SVK 'Cromleigh Textured', Welsh Blue colour.
- Ridge tiles: Terracotta.
- Dry verge system.
- Solar/PV panels where indicated.
- Walls: Smooth sand/cement or traditional roughcast render & colour washed.
- Windows: White UPVC
- Doors: Composite stained timber doors.
- Reinwater goods: Black UPVC half round gutters and circular downpipes.

Plot 2 Hand as;
Plot 1 Hand opposite



3D visualisation (n.t.s.)



ARCHITECTURAL & PLANNING CONSULTANTS
25 & 26, The Arcade, 100, High Street, Bury, Lancashire, B39 2DQ, UK
T: 01994 246388 M: 07770 426522

REV D NEW PLANNING APPLICATION 06/08/2018
REV B WINDOWS AMENDED TO UPVC 23/03/2018
REV A AMENDED AS PER MEETING WITH PCNPA 06/12/2017

Site	PROPOSED SITE REDEVELOPMENT AT BUTTLAND GARAVAN PARK, STATION RD, HAYDOVER	Drawn By	MS	Checked By		Date	19/09/2016
Scale	PROPOSED 2 NO. RESIDENTIAL BUNGALOWS FLOOR PLAN & ELEVATIONS	Drawn By	MS	Checked By		Date	19/09/2016
Scale	1/100 @ A3	Drawn By	MS	Checked By		Date	19/09/2016