

**Application Ref: NP/22/0104/FUL**

<b>Case Officer</b>	Rob James		
<b>Applicant</b>	Mr A Trollope Bellew		
<b>Agent</b>	Mr Aled Davies		
<b>Proposal</b>	Alterations and extensions to public house including the provision of 3no. proposed bed & breakfast units, internal alterations to Managers' Accommodation at first floor and conversion of existing external store to bike maintenance workshop.		
<b>Site Location</b>	Milton Brewery, Milton, Tenby, Pembrokeshire, SA70 8PH		
<b>Grid Ref</b>	SN04060316		
<b>Date Valid</b>	15-Feb-2022	<b>Target Date</b>	30-Apr-2022

The application is being brought to the Development Management Committee as the case officer's recommendation differs to that of the Community Council.

**Consultee Response**

**Carew Community Council:** No objection  
**Dwr Cymru Welsh Water:** Conditional Consent  
**Natural Resources Wales:** No Objection  
**PCC - Drainage Engineers:** SAB Approval not required  
**PCC - Transportation & Environment:** No Objection  
**PCC - Public Protection:** No Response  
**PCNPA Planning Ecologist:** No Objection Standard Advice  
**PCNPA Tree and Landscape Officer:** Conditional Consent  
**PCNPA Buildings Conservation Officer:** Objection to design  
**Dyfed Archaeological Trust:** Conditional Consent

**Public Response**

A site notice and neighbour notification letters were posted in accordance with requirements of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.

1 letter of concern has been received regarding safe working practices of removing asbestos roof and works to the car park damaging their boundary wall. Also had concerns over the size of the car park.

1 objection has been received regarding doorways opening onto a shared driveway.

**Policies considered**

Please note that these policies can be viewed on the Policies page Pembrokeshire Coast National Park website –  
[Local Development Plan 2 - Pembrokeshire Coast National Park](#)

LDP2 Policy 01 - National Park Purposes and Duty

LDP2 Policy 06 - Rural Centres

## Item 5 - Report on Planning Applications

LDP2 Policy 08 - Special Qualities

LDP2 Policy 09 - Light Pollution

LDP2 Policy 11 - Nationally Protected Sites and Species

LDP2 Policy 14 - Conservation of the Pembrokeshire Coast National Park

LDP2 Policy 29 - Sustainable Design

LDP2 Policy 30 - Amenity

LDP2 Policy 31 - Minimising Waste

LDP2 Policy 32 - Surface Water Drainage

LDP2 Policy 34 - Flooding and Coastal Inundation

PPW11

SPG05 - Planning Obligations

SPG06 - Regionally Important Geodiversity Sites

TAN 12 - Design

TAN 15 - Development and Flood Risk

### **Constraints**

Special Area of Conservation - within 500m

Site of Special Scientific Interest - within 50m

Contaminated Land

Historic Landscape

Potential for surface water flooding

Recreation Character Areas

Affordable Housing Submarkets

Seascape Character Areas

Within Site of Special Scientific Interest consult NRW / Planning Ecologist\_20m

Landscape Character Area

Special Area of Conservation - within 50m

### **Officer's Appraisal**

#### **Current Proposal**

The application seeks permission for alterations and extensions to an existing public house to include the provision of 3no. proposed bed & breakfast units, internal alterations to Managers' Accommodation at first floor and conversion of existing external store to bike maintenance workshop.

#### **Key Issues**

The application raises the following planning matters:-

- Policy, Principle of Development and Impact on National Park
- Siting and Sustainable Design
- Amenity and Privacy
- Highway Safety and Access
- Landscaping

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- Biodiversity
- Land Drainage and Flooding

### *Policy, Principle of Development and Impact on National Park:*

The property lies within the Rural Centre boundary of Milton as defined by Local Development Plan 2. Policy 6 sets out the land use priorities for Rural centres and includes permitting small scale employment developments, to protect and enhance the Centre's range of facilities, to ensure developments permitted contribute to the protection and enhancement of the special qualities of the Centre and to ensure development is of a scale that is consistent in scale with the size and character of the centre.

The proposal seeks to alter and extend an existing public house to accommodate a continued public house and restaurant business use on the ground floor and to provide 3 no. bed and breakfast units on the first floor alongside internal alterations to the existing first floor Manager's Accommodation.

The property lies within a C2 flood zone as shown on the Natural Resources Wales Development Advice Maps. Policy 34 states that development will be directed away from those areas which are at risk of flooding now or as predicted for the future by TAN 15 Development Advice Maps unless there are sound social or economic justifications in accordance with the advice set out in TAN 15.

Planning Policy Wales 11 paragraph 6.6.25 states "Development must reduce, and not increase, flood risk arising from river and/or coastal flooding on and off the development site itself".

Paragraph 6.6.29 states "The ability of emergency services to respond to flood events should be taken into account when considering if a development in a flood risk area is appropriate".

TAN 15 defines Highly vulnerable Development as; All residential premises (including hotels, Gypsy and Traveller sites and caravan parks and camping sites).

Policy 34 of the LDP states that development will be directed away from those areas which are at risk of flooding now or as predicted for the future by TAN 15 Development Advice Maps unless there are sound social or economic justifications in accordance with the advice set out in TAN 15. TAN 15 directs new development away from zone C but sets out the circumstances under which non-highly vulnerable (residential) development may be permitted in Zones C1 and C2. Under the guidance given in TAN 15 it is for the planning authority to justify whether development should be permitted in this zone, provided it can be demonstrated that:

- "i its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement; or
- ii its location in zone C is necessary to contribute to key employment objectives supported by the local authority and other key partners, to sustain an existing settlement or region;

And

- iii it concurs with the aims of PPW and meets the definition of previously development land; and
- iv The potential consequences of a flooding event for the particular type of development have been considered, and in terms of the criteria contained in sections 5 and 7 and appendix 1 found to be acceptable.”

The proposal is not part of a local authority regeneration initiative or strategy or is it necessary to contribute to key employment objectives to sustain a region, as such the test do not apply in this instance. The scheme proposes vulnerable uses in a C Zone, with no justification that accords with TAN 15.

A Flood Consequence Assessment has been submitted as part of this application and acknowledges that the site is identified to be at moderate to high risk of tidal flooding and a low to moderate risk from fluvial flooding. Tidal risk is considered to be the dominant factor at this site.

The Flood Consequence Assessment outlines some mitigating factors including incorporating flood resilience design measures as part of the ground floor level of the development and ensuring that the site manager is fully informed of the flood risk and is prepared should a flood occur through registration for NRW Flood Warnings and preparing a Business Flood Plan.

Natural Resources Wales have reviewed the Flood Consequences Assessment and are satisfied that the risks and consequences of flooding at this property are manageable to an acceptable level. However, in accordance with TAN 15 highly vulnerable uses, including holiday accommodation, should not be considered in a C2 flood zone. Whilst there is already existing residential use on the first floor by way of Managers accommodation, this proposal seeks to significantly increase the on-site accommodation by providing 3 no bed and breakfast units. In addition, the flood zone extends to surround the property which would have an impact on potential means of escape or access for emergency services in the event of a flood. As such, the proposal is contrary to TAN 15 and Policy 34.

Policy 43 Employment Sites and Live/Work Units seeks to safeguard employment opportunities by directing small-scale employment proposals to appropriate locations in or adjacent to the Local Development Plan’s identified Centres and to protect existing employment sites for employment use. As such, the ground floor use as a public house and restaurant along with the conversion of the existing store to a bike maintenance workshop and increased number of employees is considered to comply with Policy 43.

*Siting and Sustainable Design:*

Policy 8 of the Pembrokeshire Coast National Park Local Development Plan (LDP) is a strategy policy which refers to the special qualities of the National Park and lists priorities to ensure that these qualities will be protected and enhanced.

Policy 14 of the LDP seeks the conservation of the Pembrokeshire Coast National Park with criteria (a) and (b) resisting development that would cause significant

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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 fails 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)).

PCNPA Buildings and Conservation Officer has been consulted as the building is adjacent to the listed Milton Bridge. The Conservation Officer objected to the proposed design of the extension and gave the following comments:

1. The loss of the chimneys should be resisted – the recent insertion of upvc windows has done much to lessen the character of the pub – the loss of the chimneys would have a major impact
2. Whilst a new lease for a village pub is to be welcomed, the proposed extensions appear to be a rather harsh contrast to the characterful historic building, the vocabulary of large French doors and glass balustrades more akin to a modern hotel than a traditional village inn with former brewery buildings.
3. The loss of the existing cosy bar – whilst not strictly a planning issue – is also a shame.
4. The proposal in my view has an adverse impact on the setting of the listed Milton Bridge and the TCB. These buildings form an attractive group with the pub, the proposed extension clearly visible from the bridge itself. A simpler design for the rear extension, ideally omitting the glass balustrades and adopting a softer vocabulary of materials should be considered

The principle of upgrading and extending the pub is welcomed in principle, but the current scheme lacks character and sensitivity and has an impact on the setting of the adjacent listed buildings.

Following consultation a new scheme was submitted for comment and PCNPA Buildings and Conservation Officer gave the following response.

“Apart from the timbered gable and some solid piers to balcony level, I can’t see much in the way of meaningful revision in terms of the character of the host building and the setting of adjacent listed buildings. The overall form needs to be more traditional, and the glazed balustrade omitted”.

Officers consider that the proposed design of the rear extension by way of its modern design incorporating large expanses of glass will have an adverse impact upon the special qualities of the National Park and does not reflect the character of the existing Public House.

The proposal is therefore contrary to Policies 8 and 14 of LDP2

### *Amenity and Privacy:*

Policy 30 of LDP2 refers to ‘amenity’ in general with criteria (a) and (b) seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties.

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There are no overriding concerns in respect of residential amenity of the application site or the neighbouring properties.

Overall, the development is considered to have an acceptable impact on residential amenity and accords with Policy 30 of the LDP.

### *Highway Safety and Access:*

One neighbour objection has been received stating that some of the openings will open onto a shared driveway running alongside the existing public house and old brewery buildings. The new doorway opening to the northwest is shown on the proposed floor plans to open in.

A further letter of concern has been received about proposed works to the car park areas. There are no such works proposed within this application. works are limited to the brewery buildings and Public House only.

The Highways Department of Pembrokeshire County Council have been consulted and gave no objection to the proposed development

Notwithstanding the objection received the proposal is considered to be in accordance with Policy 60 Impacts of Traffic and can be supported.

### *Landscaping:*

To comply with Planning Policy Wales (2021) Section 6, Technical Advice Note (TAN) 5 and Technical Advice Note (TAN) 10, Planning authorities should protect trees, hedgerows, groups of trees and areas of woodland where they have ecological value, contribute to the character or amenity of a particular locality, or perform a beneficial and identified green infrastructure function.

Trees, Hedges and hedgebanks are considered in regard to the interests of maintaining a suitable scheme of landscaping to protect the visual amenity of the area, to maintain the special qualities of the landscape and habitats through the protection, creation and enhancement of links between sites and their protection for amenity, landscape and biodiversity value.

PCNPA Tree and landscape officer has been consulted and gave a conditional approval response protecting existing hedging from risk of damage from building operations. Subject to the proposed condition the proposal is considered to be appropriate.

### *Biodiversity:*

As proposed, works include development to roof areas of existing buildings. A bat report has been submitted with the application and PCNPA Planning Ecologist has been consulted.

No protected species were found to be present at the proposed site however the site has potential for biodiversity enhancement and a condition has been recommended to ensure a biodiversity enhancement scheme is submitted to and agreed in writing the authority prior to development taking place.

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Subject to this condition the application is considered to be in accordance with Policies 10 & 11 of LDP2 and can be supported.

### Conclusion

The proposal as submitted is not in accordance (by way of its design) with LDP2 Policy 6 - Rural Centres Criteria e) to ensure developments permitted contribute to the protection and enhancement of the special qualities of the centre. Policy 8 - Special Qualities and Policy 14 - Conservation of the Pembrokeshire Coast Park.

The proposal is also contrary to Policy 34 Flooding and Coastal Inundation Criteria a) development will be directed away from those areas which are at risk from flooding now or as predicted for the future by TAN15 Development Advice Maps or Shoreline Management Plan 2 unless there are sound social or economic justifications in accordance with advice set out in Technical Advice Note 15.

The residential aspect of the proposed development defines it as highly vulnerable and therefore cannot be supported.

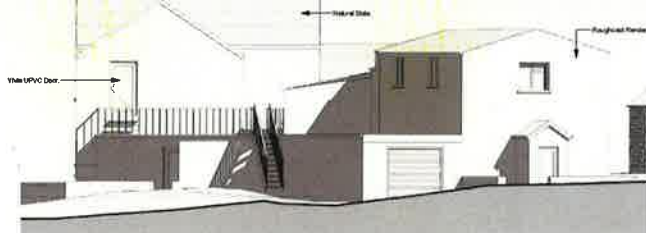
### Recommendation

That the application be refused for the following reasons:

1. The application site is located within a Flood Zone C2 and proposes residential development which is contrary to advice contained within Welsh Government Planning Policy Wales and Technical Advice Note 15 Development and Flood Risk. The proposal is contrary to LDP2 Policy 34 Flooding and Coastal Inundation Criteria a) development will be directed away from those areas which are at risk from flooding now or as predicted for the future by TAN15 Development Advice Maps or Shoreline Management Plan 2 unless there are sound social or economic justifications in accordance with advice set out in Technical Advice Note 15.
2. The proposed design is not in accordance with LDP2 Policy 6 - Rural Centres Criteria e) to ensure developments permitted contribute to the protection and enhancement of the special qualities of the centre. Policy 8 - Special Qualities and Policy 14 - Conservation of the Pembrokeshire Coast Park.





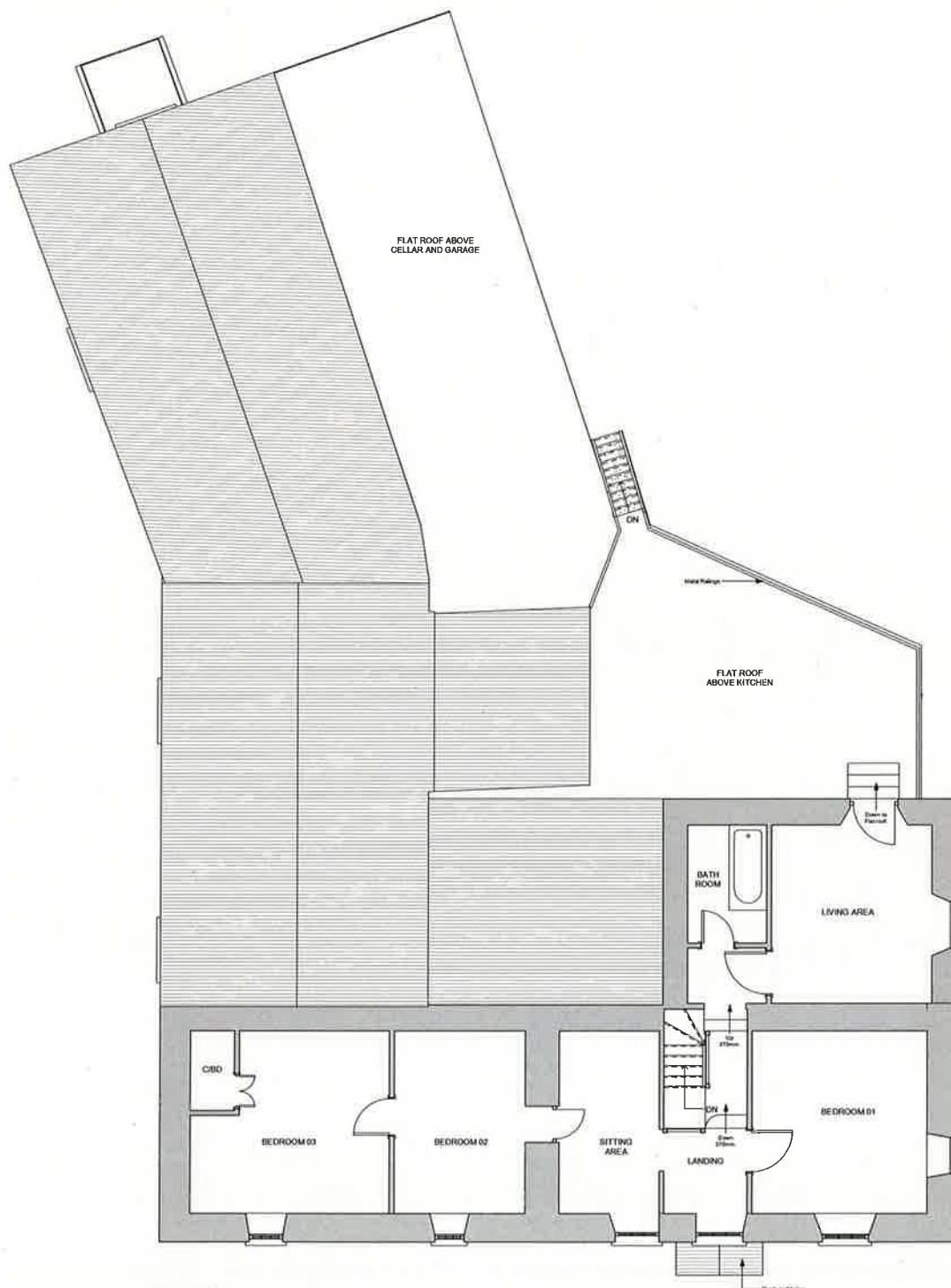


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VISUAL SCALE 1:100

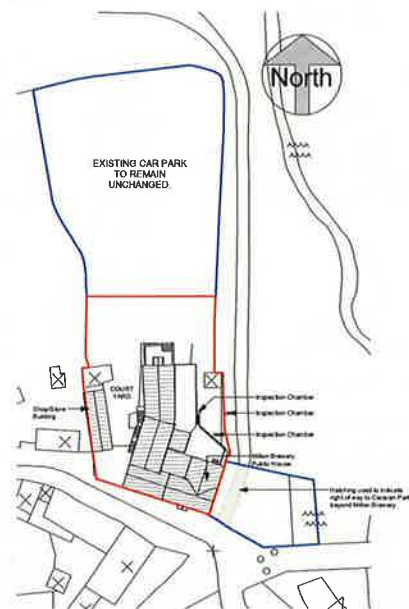


2 South East Elevation  
1:100



1 First Floor Layout  
1:50

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VISUAL SCALE 1:50



4 Block Plan  
1:500

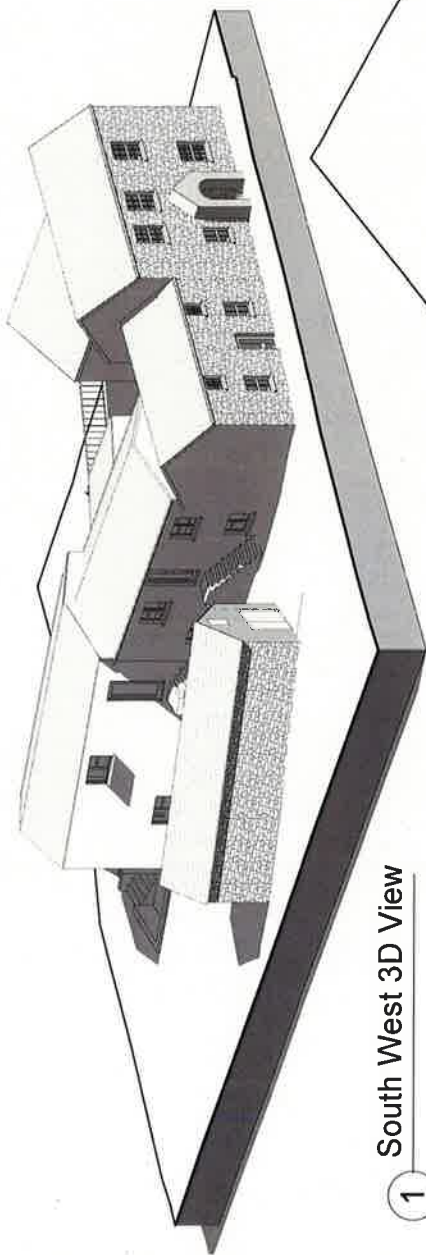
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Rev	Description	Date	PROJECT	
A	Survey Drawing	22/02/21	Milton Brewery, Milton, Pembrokeshire, SA70 8PH	
B	Sketch Proposals	09/03/21	TITLE	
C	Planning Application Drawings	30/11/21	Existing First Floor Layout, Elevations & Block Plan	
D	B&B First Floor Layout	04/01/22	CLIENT	
E	Planning Application Re-Submission	14/02/22	Carew Castle Estate	
			Scales as indicated	
			As indicated	
			DATE	
			18/02/2021	
			PROJECT NUMBER	
			20119H	
			KEN MORGAN	
			Design and Building Management Ltd	
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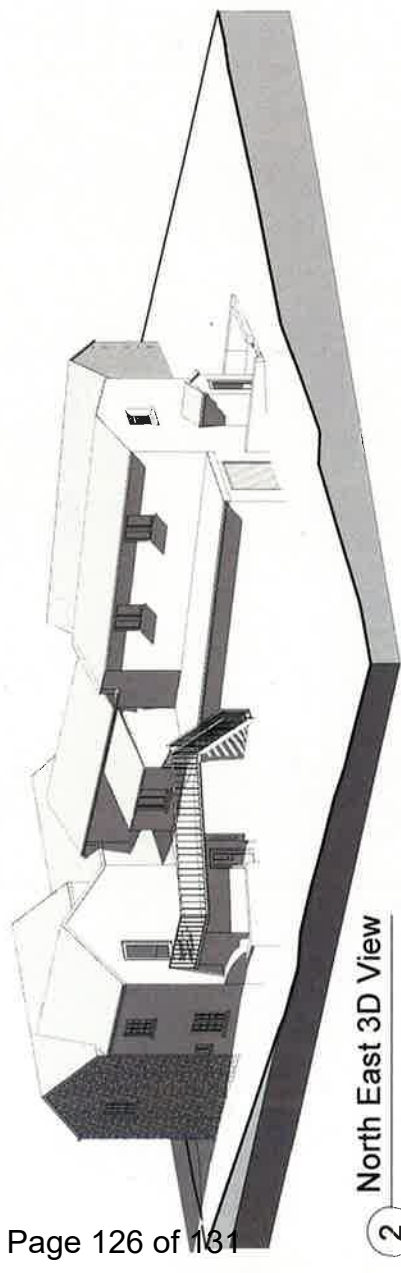
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1 South West 3D View



3 Ground Floor Cut-Through



2 North East 3D View

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PROJECT

Milton Brewery, Milton,  
Pembrokeshire, SA70 8PH.

TITLE

Existing 3D Views.

CLIENT

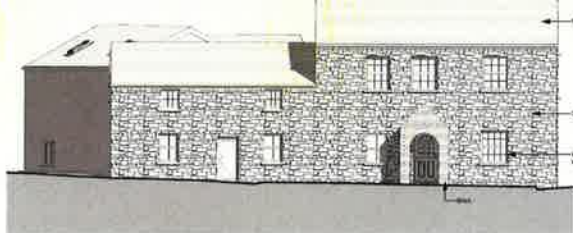
Carew Castle Estate.

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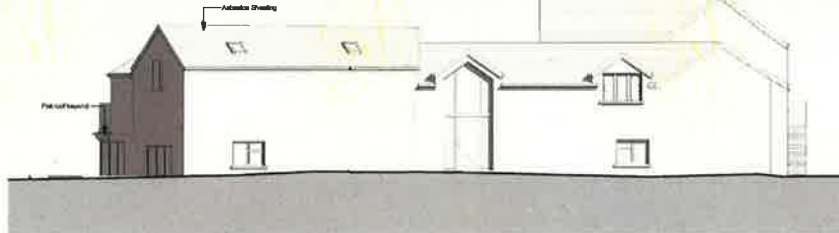
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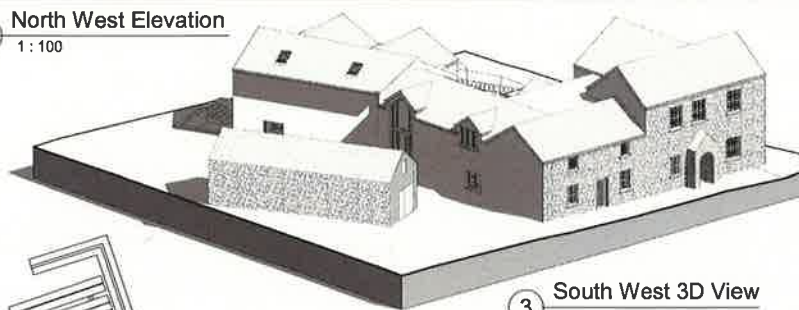




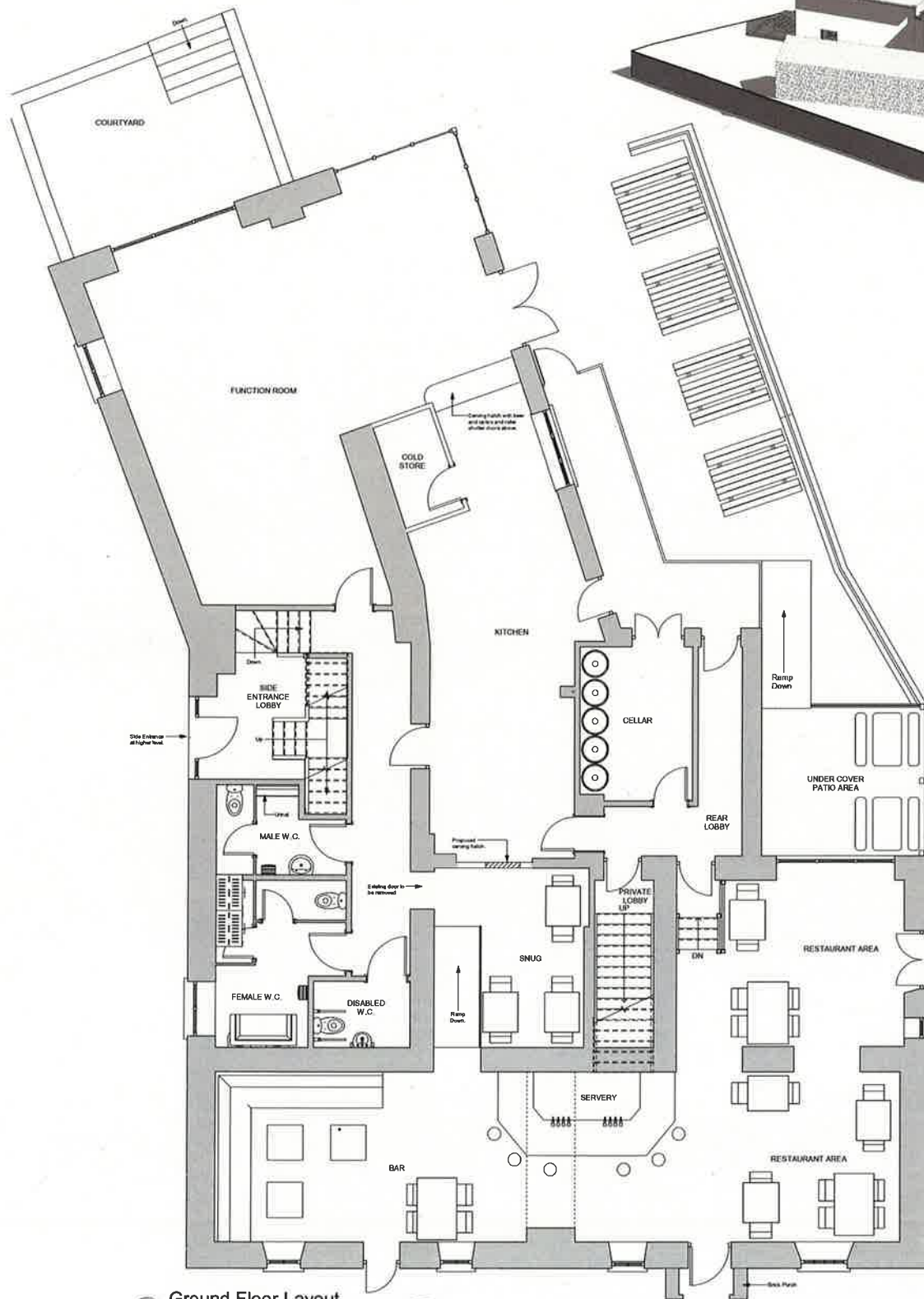
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1: 100



4 North West Elevation  
1: 100



3 South West 3D View



1 Ground Floor Layout

1: 50  
0m 1m 2m 3m 4m 5m  
VISUAL SCALE 1:50



#### FLOOD CONSEQUENCE ASSESSMENT RECOMMENDATIONS

##### 3.1 Design Principles for Development

It is recommended that, based on the current design proposals, the following design principles should be incorporated to demonstrate long-term resilience and resistance to tidal and fluvial flood risk. These recommendations are in line with Communities and Local Government guidance: Flood Resistant Construction of Buildings.

Flood-resistant construction is not considered for the first floor level as this is situated above the areas at potential risk of flooding. The below recommendations are related to changes relating to the refurbishment of the ground floor of the public house, access and ground level associated with the new three residential flats (seconded from western elevation) and the lake maintenance shop building.

##### Flood Resilience & Resiliency

The following recommendations are made to facilitate the proposed developments resilience and resiliency to reasonably immediately following any localised flooding.

- Any viable external covering into the buildings below a level of 0.43m AOD should be applied with a waterproof material. This level comprises the 0.5% AEP extreme estuary flood level, with inclusion of sea level rise based on the 95th percentile (see the Climate Change Allowance for Flood Consequence Assessment Document (2021)).
- Wooden skirting should be avoided where possible on the ground floor (or the refurbishment or install a waterproof floor resilient material).
- Floor finish should be kept as flood resistant as possible at ground floor (concrete, terrazzo, stone or tile as opposed to carpeting) as the floor can be easily cleaned down following any flooding.
- Wall construction changes should utilise Class A engineering bricks or natural hard stone up to 0.43m AOD.
- Flood-resistant wall renders and emulsion should be used up to 0.43m AOD on the ground floor refurbishment in order to reduce the impacts of any residual flooding; and
- Any skirting below 0.43m AOD should be self-cleaning to limit water access through the joint.

**Personal Flood Plan**  
The first floor of the development is also required to prepare a Personal Flood Plan using the NFW action plan template, which can be downloaded using the following link: <https://www.nfw.gov.uk/first-floor-flood-plan-template>. This template can also be seen in Appendix B of the FCA prepared by Ashfield Solution Group.

**Business Flood Plan**  
Based on the commercial use of the lake maintenance shop, a Business Flood Plan is recommended to be undertaken, using the NFW action plan template, which can be downloaded using the following link: <https://www.nfw.gov.uk/business-flood-plan-template>. This template can also be seen in Appendix B of the FCA prepared by Ashfield Solution Group.

The safest access route to the site is illustrated in Figure 2 in the FCA. This route leads west of the site via Park Road, following the road to the west to outside the potential flood risk areas.

##### 3.2 TAN15 Requirements

This section outlines how the proposed development is suitable to address TAN15 requirements. Each of the main sections refer to these within TAN15.

**Section 10 - Identifying the location of development**  
The proposed development is located on the site of the former public house building. The ground floor proposal is a new building, which is also a change in vulnerability classification. The ground floor proposal is a new building, which is also a change in vulnerability classification. The ground floor proposal is a new building, which is also a change in vulnerability classification.

Although TAN15 has recently been updated, the proposed development at the site is still considered to be justifiable. The development proposals at first floor level are similar to a previously approved planning application for the site (see Appendix A for details). The application was approved in 2017, and the proposed development at the site (Bilton Brewery) is still considered to be justifiable.

**4 Conclusion**  
The site has been assessed for flood risk from a variety of flood sources. The main source of risk to the site is tide (classified as high). Flood risk is considered to be low from the Milford Haven. Tide risk is the dominant factor in the risk of flooding from surface water, groundwater and artificial flood sources are all considered to be low. The risk from surface water is considered to be negligible.

The FCA has looked to justify the proposed development at the site and has outlined how the identified flood risk is suitably and safely managed for its lifetime in line with TAN15. This has been outlined through the following:

- No increase in flood risk elsewhere through additional built footprint or change in vulnerability.
- Implementing flood resilience design measures as part of the ground floor level of the development, considering the 0.5% AEP extreme estuary level with sea level rise based on the 95th percentile (0.43m AOD) and.
- Ensuring the occupants are fully informed of the flood risk, and any proposal should a flood event occur through notification for active flood warnings and preparing individual flood plan.

**Overall, based on this conclusion, the proposed development is deemed suitable in terms of flood risk.**

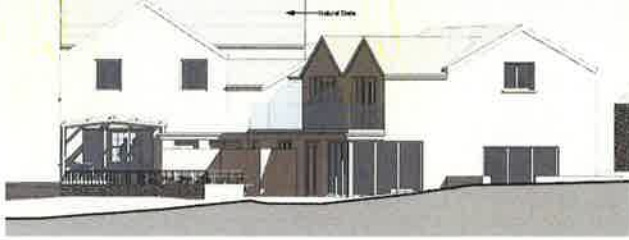
Rev	Description	Date
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D	B&B First Floor Layout	04/01/22
E	Planning Application Re-Submission	14/02/22

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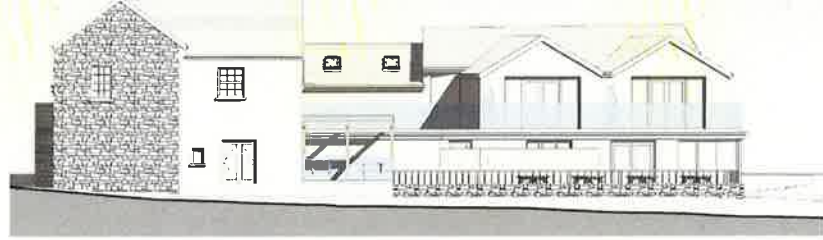
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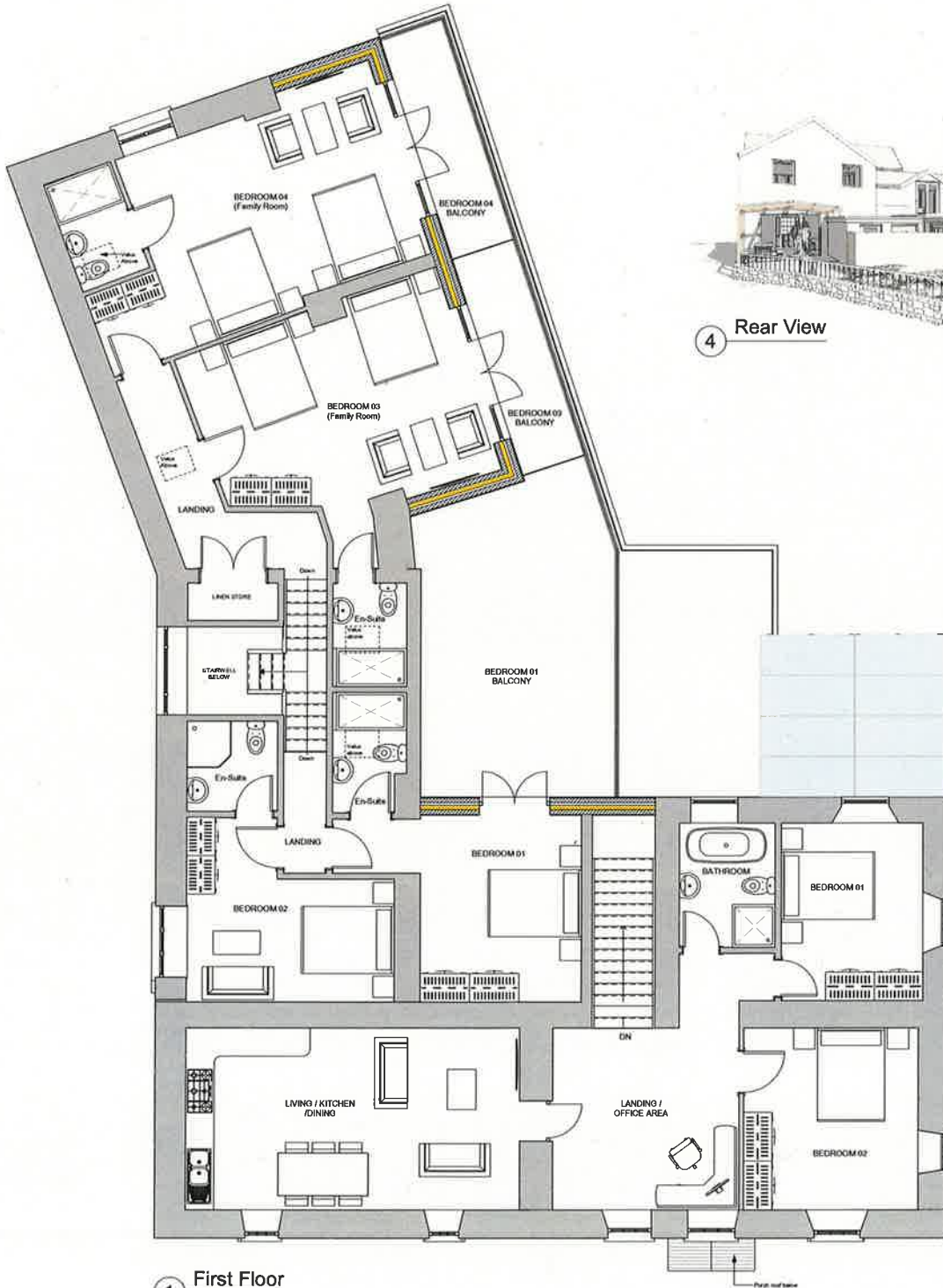
PROJECT	Milton Brewery, Milton, Pembrokeshire, SA70 8PH
TITLE	Proposed Ground Floor, Elevations & 3D View
CLIENT	Carew Castle Estate
SCALE BY	As indicated
DATE	09/03/2021
PROJECT NUMBER	20119 H
DESIGNER	KEN MORGAN Design and Building Management Ltd
APPROVED BY	RIBA Institute of British Architects



3 North East Elevation  
1:100



2 South East Elevation  
1:100



1 First Floor  
1:50  
0m 1m 2m 3m 4m 5m  
VISUAL SCALE 1:50



4 Rear View



5 Proposed Block Plan  
1:500  
0m 10m 20m 30m 40m 50m  
VISUAL SCALE 1:500

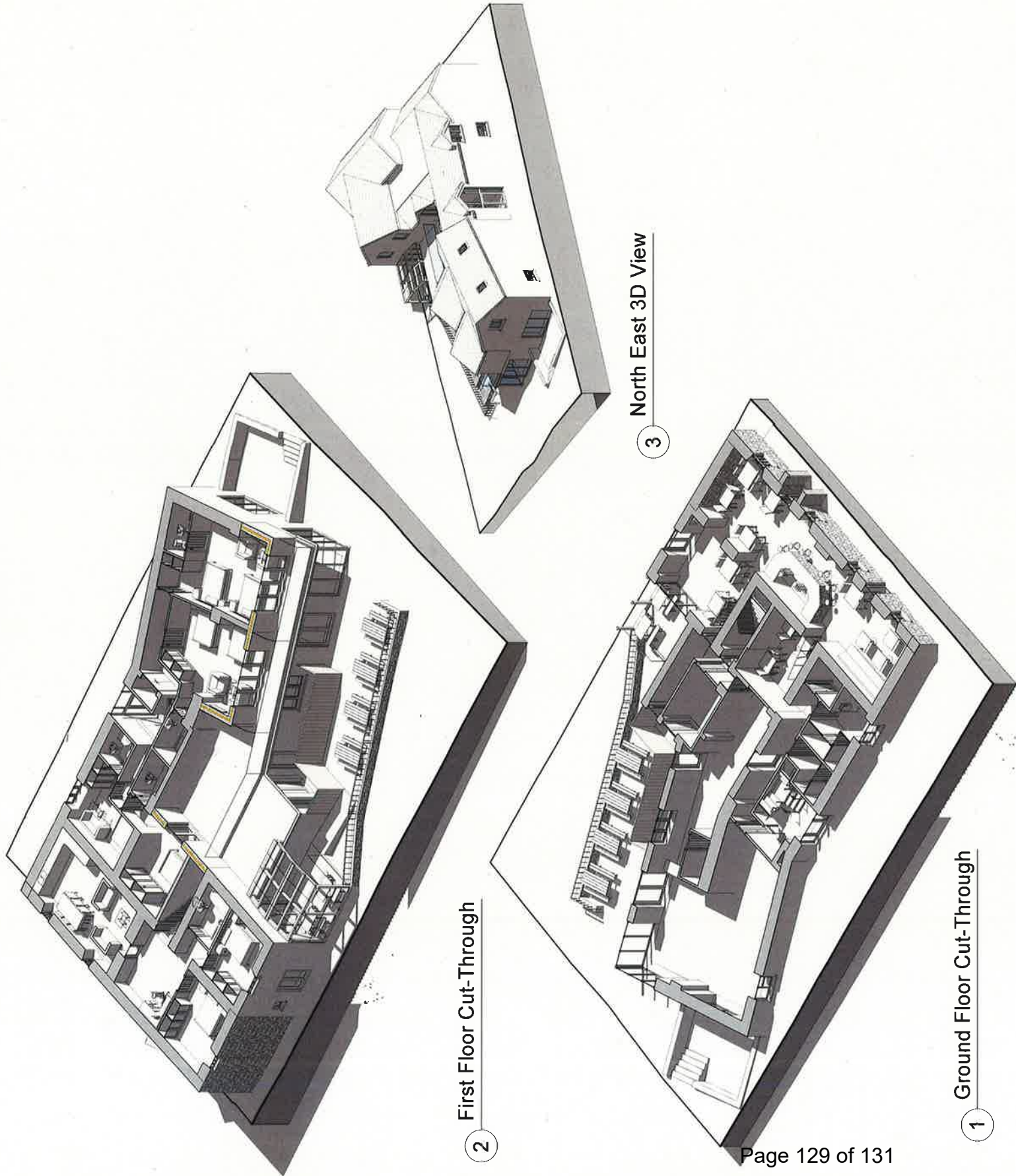
Rev	Description	Date	PROJECT	
A	Survey Drawing	22/02/21	Milton Brewery, Milton, Pembrokeshire, SA70 8PH	
B	Sketch Proposals	09/03/21	TITLE: Proposed First Floor, Elevations, Block Plan & 3D View	
C	Planning Application Drawings	30/11/21	CLIENT: Carow Castle Estate	
D	B&B First Floor Layout	04/01/22	DRAWN BY: LL B	
E	Planning Application Re-Submission	14/02/22	DATE: 09/03/2021 PROJECT NUMBER: 20119 H	
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Milton Brewery, Milton,  
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TITLE

Proposed 3D Views.

CLIENT

Carew Castle Estate.

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