

Application Ref: NP/12/0048

Application Type Full
Grid Ref: SN04650377
Applicant PCNP
Agent Pembroke Design Ltd
Proposal Replacement roof, windows and doors to the Lesser Hall area of Carew Castle
Site Location Carew Castle, Birds Lane, Carew, Tenby, Pembrokeshire, SA70 8SL
Case Officer Emma Langmaid

Summary

This application is to be considered by the Development Management Committee because the applicant is the Pembrokeshire Coast National Park Authority.

Planning permission is sought to replace the roof, windows and doors to the Lesser Hall, Carew Castle with some minor works to replace missing stonework, replace and update downpipes for better drainage, plus temporary works required in connection with construction.

These proposed works are part of a wider scheme of repair, renewal and improvement to the castle, for which funding has been approved (but for which separate planning applications are being processed). The proposals have been developed in close consultation with the relevant officers of the PCNP, Countryside Council for Wales (CCW) and Cadw to ensure the best possible outcome for the Lesser Hall and the sites historical and ecological importance. A separate Scheduled Ancient Monument Consent has also been made directly to Cadw.

The Lesser Hall is part of the C13th eastern range by Sir Nicholas de Carew but it was significantly remodelled in the late C15th with its western wall refaced with new windows and western interconnecting rooms to the old tower. Today much of Carew Castle is in a ruinous condition, however it still has a magical charm and provides regional identity. The reinstatement of a 'temporary' roof, windows and doors to the Lesser Hall some years ago, provided an important resource for the community, being the only covered area of the site. The deterioration of the Lesser Hall by the 'temporary' roof and windows and their poor condition is the driving force for replacement and essential to sustain the heritage values of the Lesser Hall and the castle and to ensure there continues to be a covered area within the castle. The scheme has been designed to sustain and enhance the character of the site whilst also ensuring that the historical and ecological value is protected.

The proposed improvements are considered to be a welcome upgrade to the existing temporary roof, windows and doors to ensure the enhancement and future preservation of an important historical asset in this part of the National Park. Due to the time constraints for grant funding for the proposed works, at

the time of completing this report not all consultation responses had been received. With no Development Management Committee in April and in order to ensure that the opportunity for funding is not delayed, the proposed recommendation is that power be delegated to the Chief Executive (National Park Officer)/Director of Park Direction & Planning/Head of Development Management to grant planning permission for this development subject to appropriate conditions and subject to no valid planning objections (which cannot be overcome by condition).

Consultee Response

Countryside Council for Wales: Reply - Interim response including some minor issues which CCW consider can be addressed relating to the supporting Method Statement and ensuring its commitments are shown on drawings either listing the points pertinent to each drawing or making reference to the document as a whole in the text box on each drawing; reference to the timings of works in the Method Statement and a slight contradiction, advise that no noisy or disturbing work carried out before 20th June and can continue to end of September; application requires a Regulation 61 screening for Significant Effect on SAC; the use of spiked bird deterrents could be harmful to bats and these should be removed; suggested proposal to allow access for Natterer's bats in the Lesser Hall for indoor flight, and whilst the proposed route for the temporary access track will minimise damage to important plant communities CCW advise the textile be laid under the supervision of an ecologist and on the completion of works be removed and damaged vegetation re-instated.

Environment Agency Wales: No objection, standard advice applies.

Cadw (Welsh Historic Monuments): No comments on the planning application received at the time of writing the report, to be reported at the Committee meeting.

Cadw (Ancient Monuments): No comments on the planning application received at the time of writing the report, to be reported at the Committee meeting.

Dyfed Archaeological Trust: No comments on the planning application received at the time of writing the report, to be reported at the Committee meeting.

Carew Community Council: No comments on the planning application received at the time of writing the report, to be reported at the Committee meeting.

PCNP Tree Officer: It does not appear to have any serious implications regarding trees and landscape other than the location of the Main Contractors Compound which is in close proximity to the trees along Castle Lane. Advisory note suggested in minimising any risk to long term damage to the trees.

PCNP Building Conservation Officer: No comments on the planning application received at the time of writing the report, to be reported at the Committee meeting.

PCNP Policy Officer: No comments on the planning application received at the time of writing the report, to be reported at the Committee meeting.

PCC - Transportation & Environment: No objection on highway grounds to the plans as submitted.

Public Response

The application has been appropriately advertised, and no responses have been received at the time of this report.

Policies considered

LDP Policy 01 - National Park Purposes and Duty
LDP Policy 07 - Countryside
LDP Policy 08 - Special Qualities
LDP Policy 09 - Light Pollution
LDP Policy 10 - Local Sites of Nature Conservation or Geological Interest
LDP Policy 11 - Protection of Biodiversity
LDP Policy 14 - Protection of Buildings of Local Importance
LDP Policy 15 - Conservation of the Pembrokeshire Coast National Park
LDP Policy 29 - Sustainable Design
LDP Policy 30 - Amenity
LDP Policy 31 - Minimising Waste
LDP Policy 32 - Surface Water Drainage
LDP Policy 35 - Visitor Economy
LDP Policy 43 - Protection of Employment Sites and Buildings

PPW4 Chapter 04 - Planning for Sustainability
PPW4 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW4 Chapter 06 - Conserving the Historic Environment
PPW4 Chapter 07 - Supporting the Economy
PPW4 Chapter 11 - Tourism, Sport and Recreation
PPW4 Chapter 13 - Minimising and Managing Environmental Risks and Pollution

SPG03 - Sustainable Design
SPG06 - Landscape Character Assessment Study, June 2009
SPG13 - Archaeology

TAN 05 - Nature Conservation and Planning
TAN 10 - Tree Preservation Orders

TAN 11 - Noise

TAN 12 - Design

TAN 13 - Tourism

TAN 15 - Development and Flood Risk

Officer's Appraisal

5.1 Background

Carew Castle lies at the head of the Carew estuary to the south west of Pembrokeshire, set within rolling farming landscape. The tidal river heads to the open sea with links to Ireland, south west England and Western Europe. The castle is located in a defensible position protected by the river and Millpond to the west and north. Although positioned at a low level, it is a prominent landmark within the landscape.

Carew Castle is leased to Pembrokeshire Coast National Park Authority (PCNP) from the Carew Estate. PCNPA manage the site through conservation, encouraging understanding and enjoyment by the public. The castle is a Scheduled Ancient Monument and Listed Building; the site is also a Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC) and is within a Historic Landscape.

PCNP in meeting the aim to conserve, encourage understanding and enjoyment of Carew Castle has secured funding for a scheme of repair, renewal and improvement as follows:

- Replacing the roof, windows and doors to the Lesser Hall;
- Removing the existing portakabins from the Walled Garden;
- Upgrading and extending Dennis' shed in the Walled Garden to provide retail/reception facility/public conveniences; and
- Resurfacing the main car park.

This current planning application proposes only the first element of the works to the Lesser Hall that of replacing the roof, windows and doors to the Lesser Hall; the remaining proposed works are the subject of separate planning applications. Below some brief extracts from the accompanying Design and Access Statement give some background to the Lesser Hall and the importance of the proposals.

The Lesser Hall is part of the late C13th eastern range by Sir Nicholas de Carew but it was significantly remodelled in the late C15th with its western wall refaced with new windows and western interconnecting rooms to the old tower. The whole of the Lesser Hall rests on a stone barrel vaulted undercroft with connecting spiral staircase to the west leading up to the Chapel Tower and Old Tower. The external approach to the Lesser Hall is currently via a flight of external steps through the western extension of the Old Tower but it is believed the steps were originally rotated ninety degrees and covered with a porch structure and wooden pentice along the eastern façade, given the

pattern of corbelling. The detailed carved stone western fireplace at upper floor level inside the Lesser Hall contains the Henry Tudor arms leaving little doubt that this was a room of some status. The remaining three and four arched windows have stone hood moulds depicting a face and part of a shield, although too eroded to be certain. The small remaining amount of window tracery and large dais window provides supporting evidence that this room was intended to impress and show off the rising status and royal patronage of the ambitious Sir Rhys ap Thomas. At a time when being on the right side, meant prosperity or death, Carew would have been used as political armoury, an expression of power as those before and after him would have done.

The roof and upper floors of the Lesser Hall have since been lost, leaving a stone shell with a couple of windows containing bathstone tracery. The chimney and corbels remain as does some internal plaster and an impressive fireplace surround. To conserve the remaining fabric a 'temporary' roof was fitted approximately 25 years ago together with timber doors and plastic glazed windows. Although only intended as temporary solutions, their poor condition now demands attention with the roof in particular poorly detailed, difficult and costly to maintain.

Whilst much of Carew today is in ruinous condition, it still has a magical charm and provides regional identity. The reinstatement of the 'temporary' roof, windows and doors to the Lesser Hall has provided an important resource for the community today, being the only covered area of the site it plays a major role in the story telling and education of forthcoming generations, connecting the past and the present.

The deterioration caused by the temporary roof and windows and their poor condition is the driving force for replacement and essential to sustain the heritage values outline above. By replacing the roof and windows with more durable, better detailed and easier to maintain fabric, it will minimise the disruptive effect of building works and occupation.

All repairs and replacements are therefore designed for long term predictable performance and sustainability. Restoration is not desirable, as there is insufficient fabric evidence or documentary evidence for it. Following research and understanding, the proposals for the replacement roof, windows and doors are based on the functional needs of the building for survival. This has included taking account the implications or consequences for the future, in addition to the avoidance of harm or irreversible actions.

The proposed design aims to provide an additional quality to the site without detracting from the integrity of preceding layers of history. Sensitive and sympathetic proposals provide an honest layer of history for future generations to understand. The impact of the Lesser Hall works on the significance of the site has been included in an appendix to the Design and Access Statement 'recommended design'.

A number of groups have been consulted from the conception of the Lesser Hall project. These include:

- Cadw – Scheduled Monument and Listed Building Inspectors
- Pembrokeshire Coast National Park Authority – Planning and Building Conservation Officers, Consultant Ecologist, Health and Safety Officer, Archaeologist, Building Maintenance Officer, Site Operations Manager
- Countryside Council for Wales – Conservation Officer

Their input influenced the design in terms of the timing of the works to minimise impact on ecology; site access and organisation to protect public, ecology and archaeology; design.

5.2 History

- 07/007 – Portacabins, renewal of consent
- 02/012 – Portacabins, renewal of consent
- 01/024 – Portacabins, renewal of consent
- 385/93 – Visitor centre, reception and exhibition
- 214/93 – Interpretation centre, exhibition building
- 282/92 – Conversion of existing building to workshop, store and mess room and construction of new store and toilet building
- 169/89 – Temporary tent site in Walled Garden

5.3 Constraints

- NPA Property
- Special Area of Conservation – within 500m
- Site of Special Scientific Interest – within 50m
- Flooding Zone
- Mineral Safeguarding Area
- Biodiversity Issue
- Historic Landscape
- Ancient Monument
- NPA Foreshore – within 25m
- TPO

5.4 Current Proposal

The current application proposes the replacement of the roof, windows and doors to the Lesser Hall, Carew Castle. These works are part of a wider scheme of repair, renewal and improvement works, for which funding has been secured. Briefly the proposals can be summarised as follows:

- Remove the existing scaffolding tube structure and sheet metal clad roof.
- Provide a replacement timber roof structure.
- Clad the replacement roof in lead with edpm gutters.

- Provide two rainwater discharges from the roof – one as existing, the other to the courtyard – details to be guided by archaeological investigations.
- Remove seven temporary softwood and perspex existing windows and seven temporary softwood existing doors.
- Provide seven replacement windows and seven replacement doors all in oak, with single glazing in the windows.
- Localised consolidation and repair of masonry.

In addition to the physical alterations to the castle, the following summarises supporting works/proposals:

- Provide contractors working compound in the car park (tree protection will be provided to the northern area of the car park).
- Provide access trackway from the car park to the outer wall of the castle.
- The trackway is to be fenced (to protect adjoining land) and covered in a temporary mesh surface (to minimise impact on archaeology and ecology) (the contractor will provide an Environmental Management Plan prior to commencement of works)
- Works will be undertaken between 21st June and 1st October to avoid disturbance to bats. Additionally there will be no night working and the use of artificial light will be prohibited for one hour each side of dawn/dusk.
- Protocols will be established to determine the periods of use of the track way (early in the morning and late in the afternoon) to reduce any visitor/contractor conflicts.
- Marshalling arrangements will be established to manage potential crossover between visitors and contractors.
- Provide a small fenced working area alongside the chapel tower with scaffolding to allow access to the Lesser Hall.
- Provide scaffolding on the courtyard side of the Lesser Hall (the contractor will provide a method statement for the use and management of the site which will include details of scaffolding design).
- Provide a temporary roof covering over the Lesser Hall to allow works to continue in inclement weather (access points will be included for bats).
- Historic fabric will be recorded before works commence and temporary protective measures will be provided. There will be an Archaeological Watching Brief during the works and provision will be made for appropriate recording.
- An independent ecological report has informed all decisions (Soltys Brewster 2011) and a Bat Mitigation Statement has also been produced to guide scheme design and site practice (Soltys Brewster 2012)
- Ecological inspections and a Watching Brief will be put in place.

The application is supported by the following documents:

- Drawings and Photomontages
- Ecological appraisal to inform work proposals (November 2011)
- Bat Mitigation Method Statement (December 2011 and updated February 2012)
- Design and Access Statement (January 2012)
- PCNP Transport Statement

6.0 Key Issues

The main planning matters raised by the application are:

- Principle;
- Visual amenity;
- Neighbouring amenity;
- Listed building/scheduled ancient monument;
- Archaeology;
- Ecology;
- Trees;
- Sustainability; and
- Minerals Safeguarding

6.1 Principle

Policy 1 of the Pembrokeshire Coast National Park Local Development Plan (LDP) refers to the National Park Purposes and Duty and states that development in the National Park must be compatible with 'a' the conservation or enhancement of the natural beauty, wildlife and cultural heritage of the national park and 'b' the public understanding and enjoyment of these qualities. Policy 7 of the LDP refers to development outside identified centres which will only be permitted where 'e' tourist attractions or recreational activity is proposed where the need to locate in the countryside is essential. Policy 35 of the LDP refers to the visitor economy and to attracting visitors outside the peak season while ensuring the National Park environment is conserved and enhanced by 'd' permitting visitor attractions and that countryside proposals should make use of existing buildings wherever possible.

The proposed improvements to the Lesser Hall support fully Policy 1 and with consultation during the development of the proposals with CCW, Cadw and the officers of the National Park the proposals conserve the natural beauty and wildlife of the Park and enhance the cultural heritage. Furthermore, the proposed new roof and alterations to the Lesser Hall provides the only covered area in the castle and some new viewing points for the features within the Lesser Hall which together help to a better public understanding and enjoyment of the castle and the importance it plays within this area of the Park. Furthermore the requirements of Policy 7 'e' and Policy 35 'd' are met, since the proposal is to an existing historical tourist attraction and makes use of an existing building.

In principle, therefore, it is considered that the proposal is acceptable. Consideration therefore needs to be given to the details of the proposal and compliance with the relevant policies of the LDP.

6.2 Visual amenity

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. 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 use of a roof pitch similar to the current temporary roof minimises the extent of masonry built and concentrates work on an area previously disturbed. The roof is only visible from aerial views and within the Lesser Hall. From above the muted tones of the leadwork will be discreet and internally the use of Douglas fir trusses and ceiling will form a discreet homogenous soffit which adds quality to the interior space. A delicate steel tie instead of chunky timber tie beam to the roof trusses is aesthetically better but also provides a clearly honest solution. The use of diagonal boarding soffit internally provides a subtle designed solution, more befitting to the status of the Lesser Hall.

Many of the Lesser Hall windows have lost their tracery and therefore the new timber mullions have been positioned to simulate the rhythm of the remaining fabric. As some of the heads have also been replaced in concrete, the exact original window proportions are unclear and therefore window frames will be partially scribed to fit the current openings with voids infilled locally. The use of lime mortar/concrete and stone to build up the voids will allow for reversal in the future with minimal disruption to the surrounding stonework.

In terms of the physical alteration, works are intended to be as minimally invasive as possible, using natural materials which will weather and integrate with the castle fabric over time. The replacement roof, windows and doors to the Lesser Hall will be legible as new works without detracting from the castle archaeology. Plus the works of making good missing stonework will be carried out to match existing as closely as possible with the appropriate use of materials. The provision of a new downpipe allows the roof to drain more efficiently and is a significant improvement on the current arrangement. Use of aluminium rainwater goods provides a lightweight solution for fixings and the powder coating minimises maintenance and improves the appearance.

In addition to the works to the fabric of the castle, some enabling works are proposed including contractors compounds in the existing car park and another within the existing castle walls, plus a vehicular access track alongside the existing pedestrian access into the castle. These works are necessary for the period of the construction works, and their impact will be for a temporary period only.

It is considered that the proposals for the Lesser Hall are acceptable in visual terms, having been developed in close consultation with the PCNP Building Conservation Officer and Cadw and supported by a detailed Design and Access Statement, drawings and photomontages to show indicatively how the completed works will look.

6.3 Neighbouring Amenity

Policy 30 of the LDP refers to 'amenity' in general seeking to avoid incompatible development and significant adverse impact upon the amenity enjoyed by neighbouring properties by virtue of the development leading to an increase in traffic or noise or odour or light and/or the development is visually intrusive.

Whilst Carew Castle is close to the settlement of Carew, the proposed alterations to the roof, doors and windows of the Lesser Hall will not be visible from outside the castle. In order to facilitate the works, it will be necessary to have compounds for the storage of materials and construction traffic visiting the site, however given the castle is open to the public these areas and vehicular visits will be managed to ensure the castle as a tourist facility remains fully functioning. The actual construction period will be for a temporary period only and working hours can be adequately controlled by condition to ensure limited noise and disturbance. At the time of writing the report no comments had been received as a result of public consultation.

Given the above it is not considered that the proposal will have any significant adverse impact on the amenity enjoyed by neighbouring properties.

6.4 Impact upon the listed building, scheduled ancient monument and archaeology

Policy 8 of the LDP refers to the Special Qualities with criterion 'd' seeking to ensure that the historic environment is protected and where possible enhanced.

The proposals aim to preserve the existing character, local distinctiveness and fabric of the castle. The uses and density of development have been established over time and these proposals do not detrimentally impact on this recognisable landmark. Historic boundaries and building lines will not be altered or it's setting within the landscape significantly change. In terms of physical alterations, works are intended to be as minimally invasive as possible, using natural materials which will weather and integrate with the castle fabric over time. The replacement roof, windows and doors to the Lesser Hall will be legible as new works without detracting from the castle listed status or archaeology. The roof promotes innovative design and quality and through use of materials and detailing which will enhance the space internally.

The provision of a new downpipe allows the roof to drain more efficiently and is a significant improvement on the current arrangement. The new downpipe

is positioned in an area where there appears to have been an historic outlet and therefore consent for archaeological investigation locally is sought for a local soakaway as part of this application.

Dyfed Archaeology and Cadw have been consulted on the application, but at the time of writing this report their comments had not been received on the planning application. Cadw has indicated to the agent that they were close to issuing a provisional decision letter with regards the Scheduled Ancient Monument application. As for archaeology Cadw has accepted the written scheme of investigation submitted with the [SAM] application. It will require excavation of the soakaway area prior to the main contractor adopting the site so there is no conflict and it will allow for any modification to the downpipe/hopper arrangement as necessary.

Formal consultation responses will be report verbally at committee and any suggested conditions or informatives from these consultees will be suggested for inclusion, as appropriate.

6.5 Ecology

Policy 11 of the LDP seeks to ensure that development that would disturb or otherwise harm protected species will only be permitted where the effects will be acceptably minimised or mitigated through careful design, work scheduling or other measures.

The castle is a Scheduled Ancient Monument and the buildings and grounds, with the exception of the inner part of the Walled Garden, are also designated a Site of Special Scientific Interest (SSSI) largely on the basis of the presence of roosting Greater Horseshoe bats. Carew Castle is nationally and internationally important for its Lesser and Greater Horseshoe bat populations. The site also forms a constituent part of the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC). The SSSI citation in addition to bats refers to the notable wall flora associated with the castle and walled garden as well as colonies of regionally rare species within the grounds.

Ecological Appraisal

In order to inform the ecological constraints/opportunities associated with the proposed works to the Lesser Hall the applicant's ecologist were commissioned to update a previous habitat survey of the site undertaken in 2004 which also included mapping the extent/distribution of rare plant colonies within the grounds. The accompanying Ecological Appraisal describes the findings of the repeat survey and identifies measures to limit potential impacts on rare plants/habitats associated with contractor access to the work areas and maintaining public access to the castle and walled garden. A separate survey was commissioned specifically to identify measures required to ensure protection of bats as part of the Lesser Hall renovation works, and this will be discussed below.

In considering the potential impacts (and avoidance/mitigation measures) on habitats and notable plant species as part of the proposed works, the findings of the most up to date survey have been used in the first instance since the September 2011 survey represents the most up to date description of ecological conditions at the site and the distribution /extent of the rare plant species.

The proposed works to the Lesser Hall would require access for plant and machinery from the existing car park to the Walled Garden and the eastern wall of the Castle. In parallel with allowing access for plant and machinery, a separate dedicated access for pedestrian visitors to the site, from the car park would need to be maintained. An indicated route alignment for construction access, with a working corridor of up to 4m wide along this alignment, is shown on the accompanying 'site access plan'. This access would affect the short mown amenity grassland of negligible ecological interest, with the exception of scattered plants and the colony of approximately 20 plants of Fiddle Dock, would largely avoid the areas of the site where notable species had been recorded (in both 2004 and 2011).

Within this corridor, further measures to reduce the potential impacts, particularly with regards to tracking of plant and machinery, could involve clear demarcation of the vehicle route with protective mesh matting (to avoid damage/poaching of the grassland surface) and to align the access as close as possible to the southern wall of the Walled Garden, although an offset from the wall of at least 1-2m would be recommended to avoid accidental damage to the walls and associated flora. Any protective matting used would ideally be of a 'grid' type design that permitted water and some light to pass through to the grassland beneath.

Other measures that should be adopted include clear demarcation of the limits of the access corridor (e.g. with Heras fencing) to prevent damage to adjacent habitats – which includes the main colony of Fiddle Dock to the south. Any temporary storage of materials should be within similarly demarcated areas and should be confined to flat areas of grass avoiding any embankments/buried earthworks.

The main contractor's compound will be located within the existing hard surfaced car park to the south of the site boundary wall. Vehicular movement to and from the car park to the working area at the east wall of the castle would be restricted so as to avoid public opening times as far as practicable. Additional arrangements identified by Cadw to minimise potential impacts on the historic environment that would be adopted include:

- Use of existing site access gate from car park for plant/machinery with segregation of the gateway to provide temporary pedestrian access;
- Use of the grassland area south of the south east tower of the castle as a temporary storage for materials with restrictions on vehicular movements to and from this area outside of public opening hours;
- Working area for contractors to the south of the walled garden.

Prior to commencement of works it has been recommended by the applicant's ecologist that the appointed contractor produces a Contractors Environmental Management Plan (CEMP) for agreement with the National Park Authority and other relevant consultees (e.g. Cadw, CCW). A copy of the ecological supporting statements should be made available to the contractor at tender stage. In addition to the measures described for minimising impacts notable grassland plants and habitats the CEMP should include information relating to storage of materials/chemicals and measures to be adopted to avoid/minimise the risk of accidental spillages into watercourses.

Carew River

The site lies adjacent to the Carew River and the river is a tributary of the tidal Cleddau and is included at the upper edge (tidal limit) of the Pembrokeshire Marine SAC. Based on the type and extent of renovation works, the risk of an impact on the river and the Marine SAC is considered negligible on the basis that:

- The proposed works are focused at the castle and would not require tracking of vehicles or storage of materials in close proximity to the river;
- The main contractors compound where plant and materials would be stored when not working would be located in the existing hard surface car park to the south of the castle boundary (i.e. further away from the river); and
- A CEMP would be produced by the appointed contractor and this document would be subject to review by the National Park Authority and CCW.

Bats and mitigation

In addition to the ecological appraisal of September 2011, summarised above, the applicant's ecologist also prepared a Bat Mitigation Method Statement originally dated December 2011, but updated following CCW initial comments and resubmitted February 2012. The updated version of this document describes the principles of a mitigation strategy to minimise potential impacts and help maintain the 'favourable conservation status' of bat species as part of the proposed works. Key mitigation for the site will include timing constraints upon proposed works as well as reasonable avoidance measures and monitoring requirements. The specific measures are summarised below:

- Timing constraints employed to ensure that works are undertaken between 21st June and 1st October when significant numbers of Horseshoe bats are least likely to be present or if present are at their least vulnerable;
- An inspection of all crevice habitat to be undertaken prior to erection of scaffolding and 'tent' structure by a licensed bat ecologist with the aim of avoiding any 'enclosure' of bats within a given crevice/area – i.e. access for bats to crevice habitat would be maintained;

Item 6 - Report on Planning Applications

- Tool-box talk delivered to scaffolding and roofing works contractors by bat ecologist to raise awareness of the bat interest on site and the subsequent requirement for 'soft/quiet' working as far as possible;
- Supervision by a licensed bat ecologist of erection of the scaffolding and 'tent' structure with suitable bat access points incorporated/retained to allow continued access to chimney and undercroft areas. Bat access points will be a minimum of 450mm by 450mm;
- Supervision of all further site works as required by a licensed bat ecologist within timing constraints within the day on 'loud' work at the ecologist's discretion. These constraints will be potentially disturbing activities such as scaffold erection, existing roof removal and new roof erection where these work are in proximity to known roosts. Works will be undertaken in the late afternoon where practicable;
- No artificial lighting will be utilised either side of dusk and dawn and no night working will be undertaken.

In addition to the considerations on the planning application, further detail in relation to the above would need to be provided as part of a Method Statement to accompany a derogation licence application to the Welsh Government once planning permission for the works has been secured. Monitoring requirements for the site will be confirmed within this application but are likely to be incorporated into the continued SSSI monthly monitoring visits currently undertaken by Pembrokeshire Bat Group and Carew Castle Staff.

CCW has made initial comments on the application at the time of writing this report. Its comments have been summarised above under 'consultee response' and these comments have also been forwarded to the agent and project manager for the application. The applicant has responded to the comments and stated that all points raised can be addressed and that they are happy to accommodate them save for condition 5 which was something that would be desirable for CCW; (allowing access to the internal area of the Lesser Hall for Natterer's bats). A response from the applicant's ecologist was forwarded to CCW along with a revised Bat Mitigation Method Statement in response to the initial comments (a summary of which is provided in the consultees section). The revised Bat Mitigation Statement and updates to drawings to accommodate CCW's initial comments are expected to be submitted to the Planning Authority shortly and once received, relevant statutory consultees will receive re-notification and be given an opportunity to comment further.

6.6 Trees

With regard to the issue of the site TPOs, PCNP Tree Officer has been consulted and commented that the proposal does not appear to have any serious implications regarding trees and landscape other than the location of the main contractor's compound which is in proximity to the protected trees along Castle Lane. It was noted in initial advice that the information included with the application showed construction access and egress for the site will be tightly controlled through the implementation of defined routes (fenced) and

designated compounds for the storage of materials (fenced), which will ensure that the construction materials and traffic will not come into proximity of the trees and hedges on the site. To ensure that the trees in proximity to the main contractor compound are not affected by the development PCNP Tree Officer has recommended advisory notes are considered in particular to ensure that trees and hedges are not affected chemically (through contaminants) or physically (through compaction) below ground along the northern boundary of the compound.

It is considered that in the light of the PCNP Tree Officer comments there will be no detrimental impact on protected trees on the site.

6.7 Sustainability

Policy 29 of the LDP refers to sustainable design and expects all proposals for development to demonstrate an integrated approach to design and construction in terms of 'a' place and local distinctiveness, 'b' environment and biodiversity, 'c' community cohesion and health, 'd' accessibility, 'e' energy use, 'f' energy generation, 'g' materials and resources, 'h' water and drainage, 'i' waste and 'j' resilience to climate change. Policy 31 of the LDP refers to minimising waste requiring development to minimise, re-use and recycle waste generated during demolition and construction. Policy 32 of the LDP requires development to incorporate sustainable drainage systems for the disposal of surface water on site.

Design

The reuse of existing structures is resource efficient in itself but the design has been developed with long term durability, practicality and ease of maintenance in mind. The detailing addresses current failures in design and will minimise risk of decay and loss of fabric in the longer term, providing a more sustainable solution. All the Lesser Hall options considered were compared for life cycle costing with the proposed solution within mid-range in terms of cost over a hundred year cycle.

The new roof will provide a drier covered space than that provided by the temporary roof. Existing infrastructure including services and transport to be utilised and therefore the scale of development is appropriate to its setting, achieving a balance between the built and natural environment.

The Lesser Hall is an unheated space but the roof has been insulated to help combat condensation and offers improved thermal performance for the future. Roof ventilation is provided by passive means through a vaulted ridge detail. The roof has an extremely high recycled content and can be recycled at the end of life. Timber will be sourced from sustainable resources and the aluminium rainwater goods can be recycled too. The use of lime mortars has lower embodied energy and better durability for masonry repairs.

Drainage

Drainage from the Lesser Hall roof into a soakaway provides a sustainable drainage solution.

Ecology

The use of protective matting during construction will preserve topsoil and native species for access to/from the site. New habitat is being considered for Natterer bats and this could increase the variety/type of accommodation for other bat species too.

Travel

The development has no negative impact on promoting sustainable means of travel, or ensuring ease of access for all. All users, whether they come on foot, bike or vehicle can continue to use the site. Existing links and connectivity remain unaffected. No changes will be made to movement and access to and through the site. Wherever possible there will be improvements to surfacing to make sure it is suitable for a wide variety of users.

It is considered that given the above the proposals for the Lesser Hall, including the enabling works during the construction phase, have carefully considered the issue of sustainability and the design approach has successfully incorporated many sustainable features in accordance with the relevant policies and is therefore acceptable.

6.8 Minerals Safeguarding

The site lies over an area of minerals safeguarding. PCNP Development Plans section has been consulted and its views are awaited as regards the proposals impact on minerals resources in the area.

7.0 Conclusion

Taking into consideration the design proposals and the reasons behind them the proposed improvements are considered to be a welcome upgrade to the existing temporary roof, windows and doors to ensure the enhancement and future preservation of an important historical asset in this part of the National Park.

8.0 Recommendation

That power be delegated to the Chief Executive (National Park Officer)/Director of Park Direction & Planning/Head of Development Management to grant planning permission for this development subject to appropriate conditions and subject to no valid planning objections (which cannot be overcome by condition).

9.0 Conditions / Reasons

The full list of conditions will be formulated upon the receipt of all consultee responses, suggested conditions at time of writing report as follows:

- G1 – Standard Time
- G1a – Deposited Plans and Conditions
- L4a – Protection of hedges, walls and trees
- D5a – Schedule of finishes and colours

Whilst the formal comments of some consultees are yet to be received, it is considered likely that the following matters will need to be covered by condition:

- Contractors Environmental Management Plan
- Secure ecological mitigation proposals
- Storage of chemicals, materials in compounds
- Hours of operation of works
- Details of rain water goods, including tank
- Details of method of removal of existing roof and windows
- Details of new windows, doors, railings and roof including fixings
- Details of contractors compounds, access track, fencing/enclosures

10.0 Informatives

The full list of informatives will be formulated upon the receipt of all consultee responses, suggested conditions at time of writing report as follows:

I1 p Applicants attention is drawn to the following notes:

EA – Standard Advice

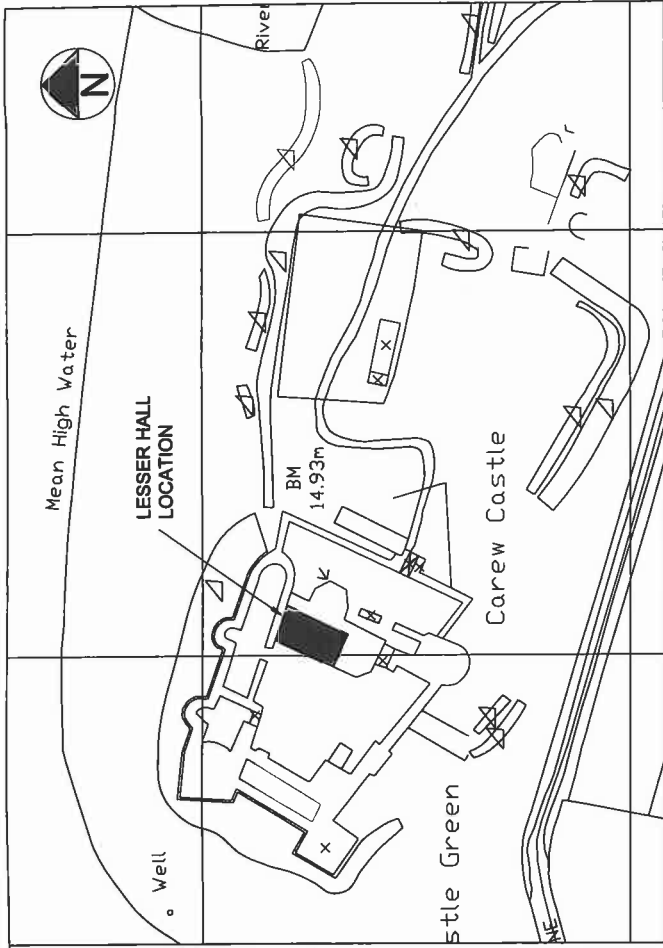
Tree Officer – Advisory Notes

The location of the Main Contractors compound is the only area in proximity to trees and hedge and as such it would be advised to ensure that trees and hedges in proximity to the area are not affected chemically (through contaminants) or physically (through compaction) below ground along the Northern boundary of the compound.

- Clarification that the Main contractors Compound will also be securely fenced.
- The trees and hedge are established on a hedge bank structure; Root morphology along Pembrokeshire style Hedge banks suggest that the majority of the roots will be within the embankment with only minor roots spreading beyond the hedge bank.

Item 6 - Report on Planning Applications

- A minimum Construction Exclusion Zone distance of 2 metres from the base of the hedge bank structure should ensure minimal damage to the root system of the retained trees through compaction during the development.
- To further ensure that the root systems are not indirectly affected by the compound it would be necessary to ensure that chemicals / contaminants are not discharged (or stored) within 10m of the retained trees and hedge in accordance with BS5837 section 9.4.2 (b).



LOCATION PLAN 1:1250

NP 17 U 40

REVISIONS NOTES:

DATE	REV
11/01/2011	1

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Project
EXISTING ROOF PLAN
REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE

Client
PEMBROKESHIRE COAST NATIONAL PARK

PEMBROKE DESIGN		Job No 8389	
L	I	Original Size A3	Checked by CJ
M	T	Date 12.11	Drawn MWS/CJ
E	D	Rev E01	

CHARTERED ARCHITECTS BUILDING SURVEYORS QUANTITY SURVEYORS CDM

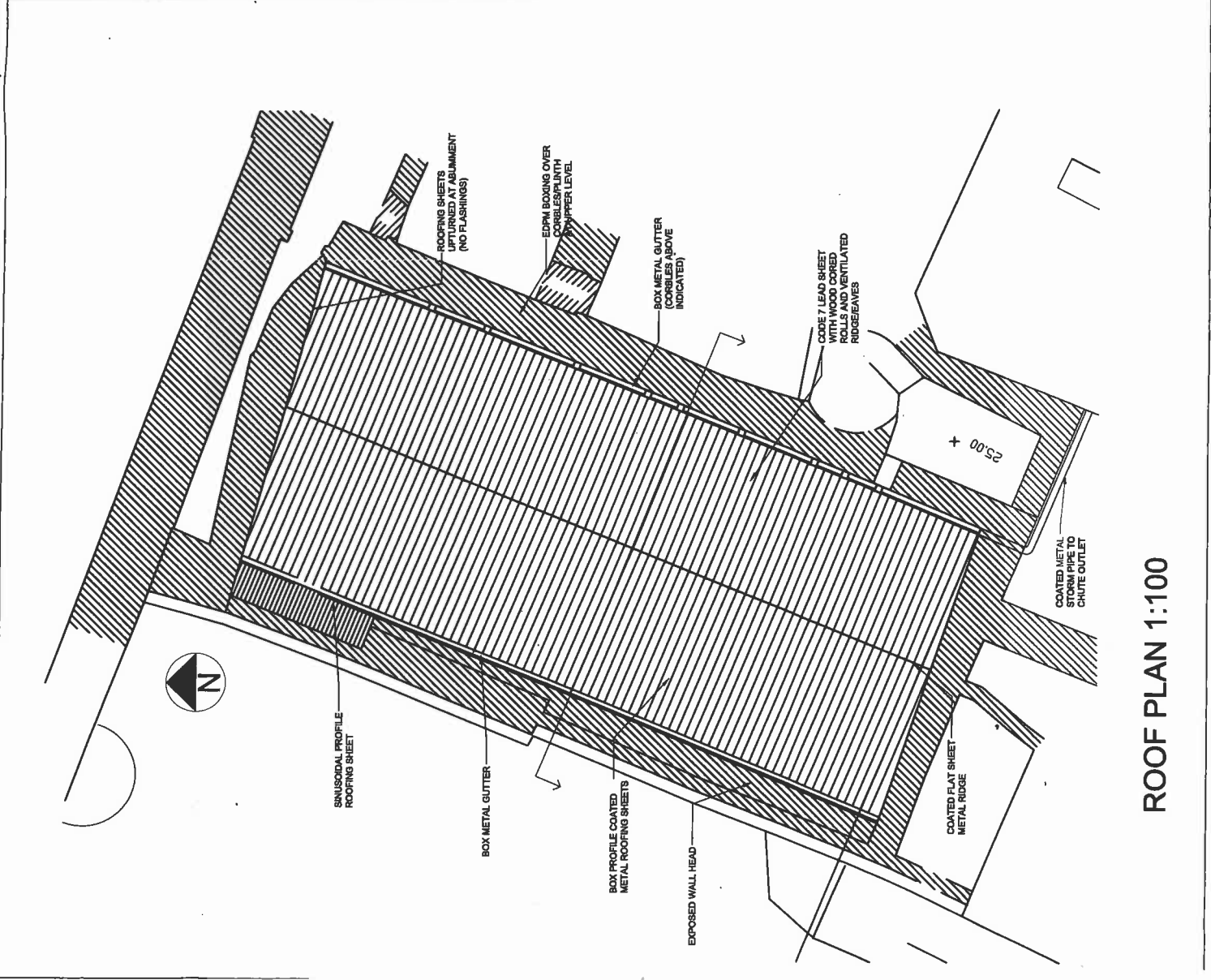
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 107520

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Work to agreed dimensions in preference to scaling.

The contractor is expected to supply and do everything necessary for the proper execution of the works that may be reasonably inferred from the drawings and specification, whether referred to in detail or not, without extra payment, in respect thereof.

The finished building will require service maintenance in accordance with custom and practice and the manufacturers recommendations. The architects drawings are to read in conjunction with the engineers and all specialist manufacturers / suppliers drawings



ROOF PLAN 1:100



NP 12 0 4 8

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Work to figured dimensions in preference to scaling.

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The architect drawings are to be read in conjunction with the agreement and all specialist manufacturers / suppliers drawings.

-6 FEB 2011

01.12 A
DATE REV

RED/BLUE LINES REVISED

REVISIONS NOTES:

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LOCATION PLAN

Project
REPLACEMENT ROOF, WINDOWS & DOORS TO THE LESSER HALL AREA OF CAREW CASTLE

Client
PEMBROKESHIRE COAST NATIONAL PARK

PEMBROKE DESIGN

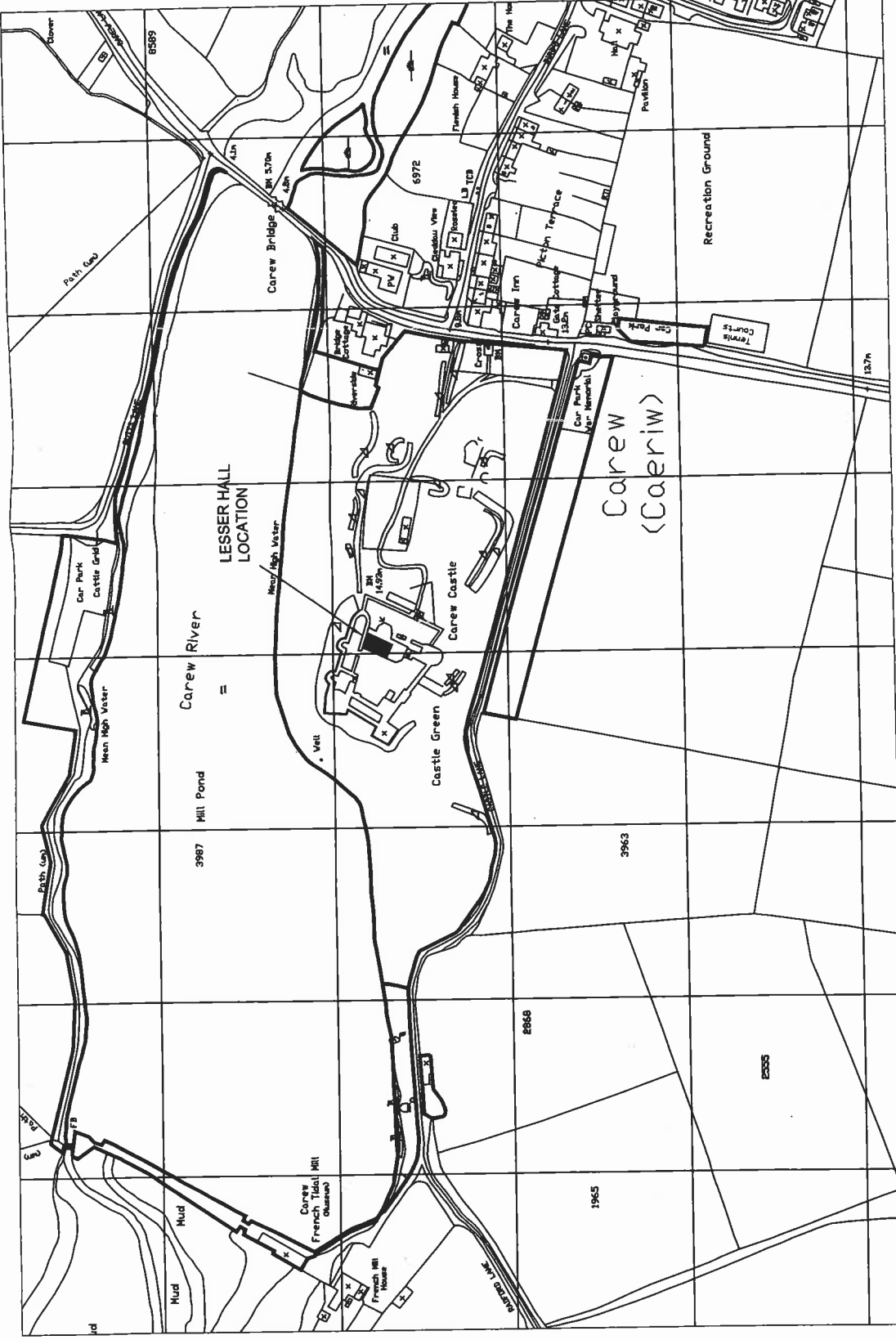
L I M I T E D

0 PEMBROKE CODE
16 PEMBROKE ROAD
5072 APT
TEL 01462 68433
FAX 01462 68434
PEMBROKE, Pembrokeshire, SA20 8JN

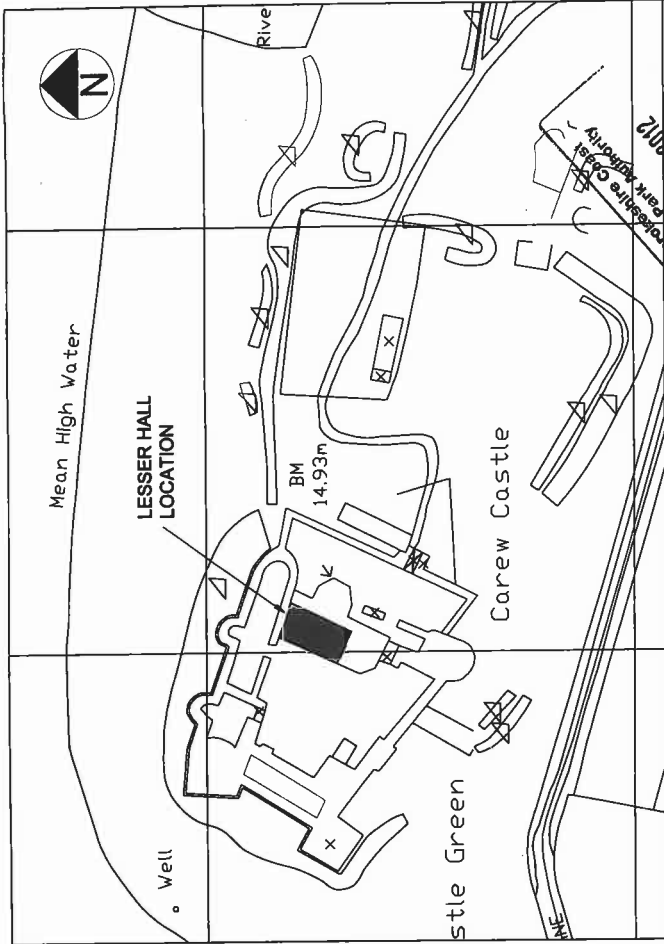
0 CONTRACTOR
16 PEMBROKE ROAD
5072 APT
TEL 01462 68433
FAX 01462 68434
PEMBROKE, Pembrokeshire, SA20 8JN

ARCHITECTS
BUILDINGS
SURVEYORS
PLANNERS
STRUCTURAL
ENGINEERS
CIVIL
ELECTRICALS

Designed	CSJ	Scale	1:2500	Original Size	A3	Job No	8389
Drawn	CSJ	Date	12.11	Checked by	CJ	Draw No	Rev
							LP01A



LOCATION PLAN 1:2500



LOCATION PLAN 1:1250

REVISIONS NOTES	DATE	REV
● Pembroke Design Ltd 2011		
Drawn		
PROJECT		
REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE		
Client		
PEMBROKESHIRE COAST NATIONAL PARK		

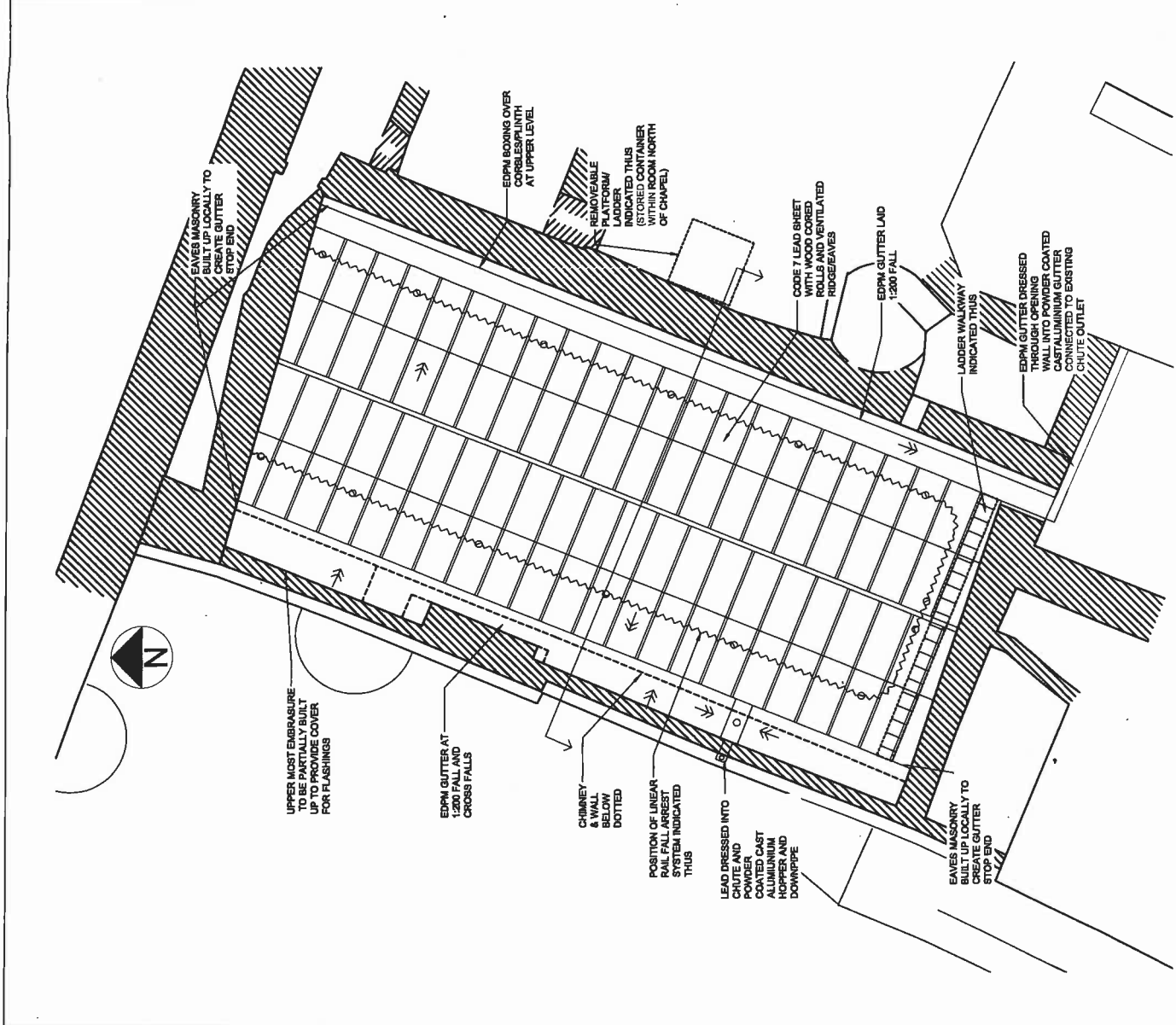
PEMBROKE DESIGN		L I M I T E D	
DESIGNED	Scale	Original Size	Job No
CJ	1:100/1250	A3	8389
DRAWN	Date	Checked by	Draw No Rev
CJ	12.11	CJ	SK01

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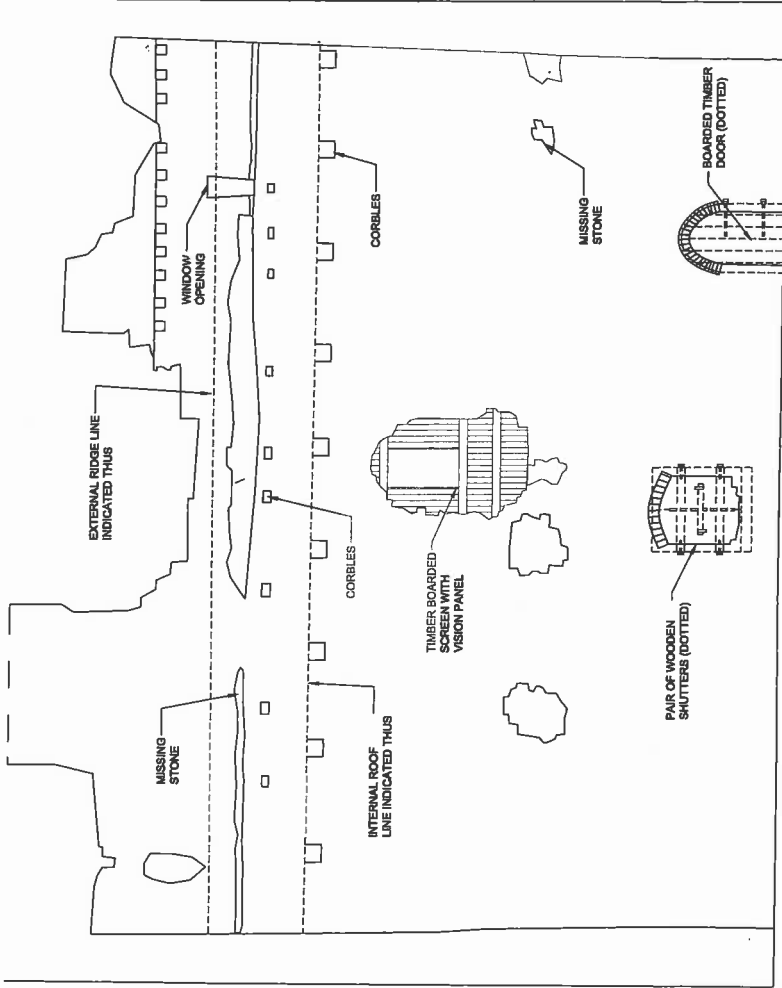
Work to figured dimensions in preference to existing.

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ROOF PLAN 1:100



INTERNAL ELEVATION (EAST WALL) 1:100

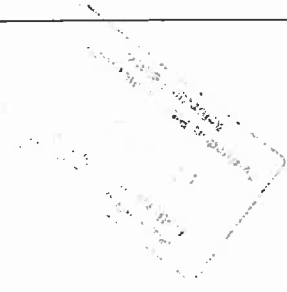
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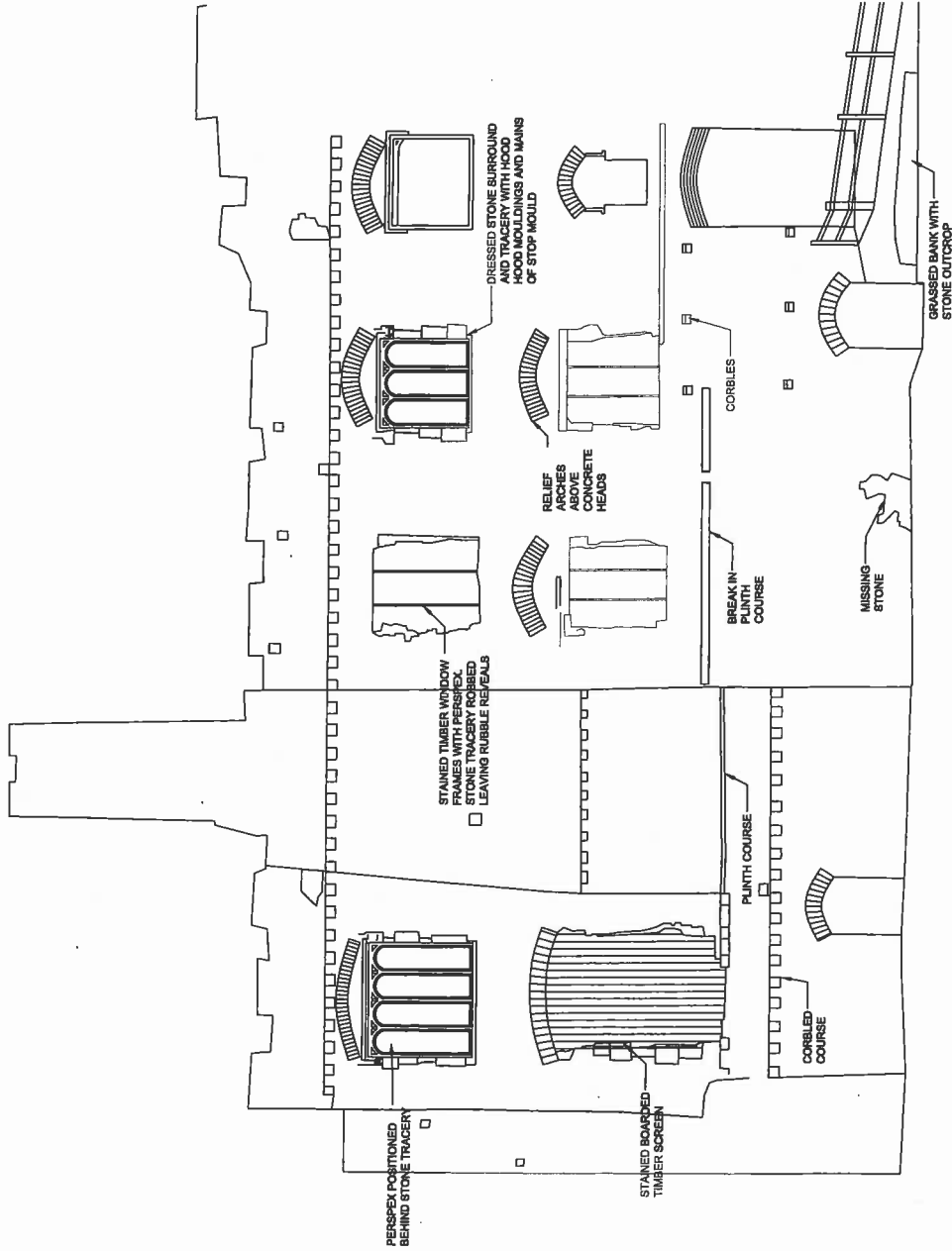
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REVISIONS NOTES. ① Pembroke Design Ltd 2011	DATE REV
Projg EXISTING ELEVATION	
Project REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE	
Client PEMBROKESHIRE COAST NATIONAL PARK	
PEMBROKE DESIGN	
L I M I T E D	
① PEMBROKE DESIGN LTD 47/1 ACTON PLACE 961, 962 TEL: 01247 794171 www.pembroke-design.co.uk	② CONSULTANTS 28 SPANISH STREET 501, 502 TEL: 01247 8148 FAX: 01247 33471 www.pembroke-design.co.uk
Designed CJ	Scale 1:100
Drawn MWS/CJ	Original Size A3
Date 12.11	Checked by CJ
Job No 8389	Draw No Rev E05



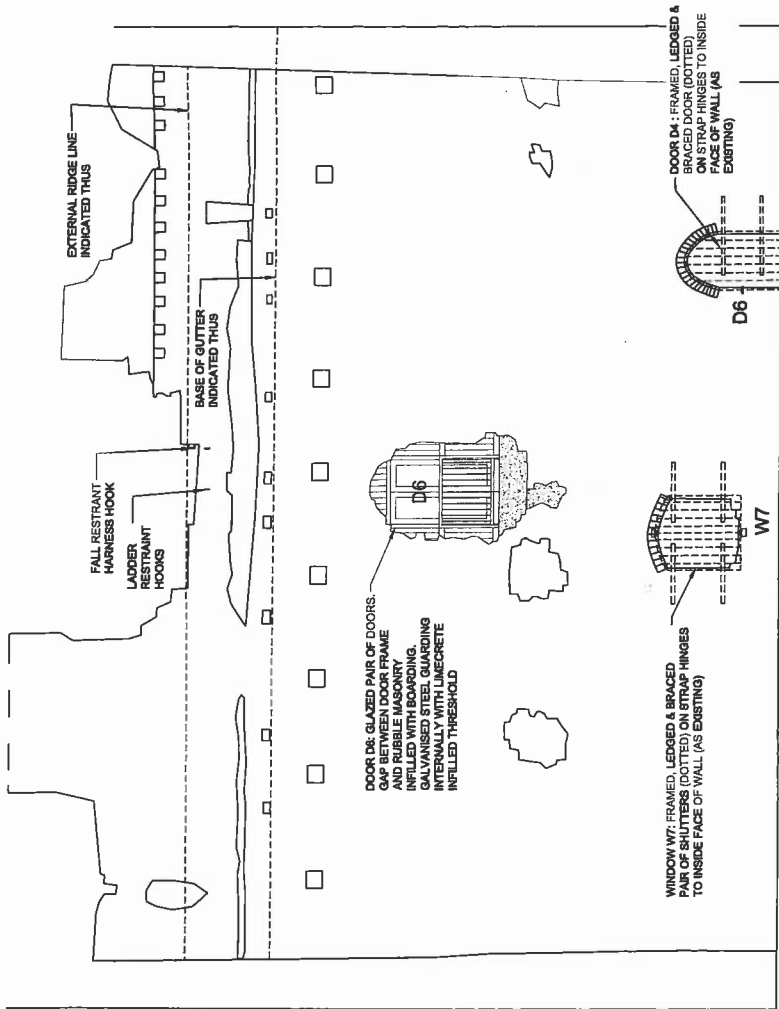
17 JAN 2012
 Pembroke Coast
 National Park Authority
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WEST ELEVATION 1:100

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REVISIONS NOTES. © Pembroke Design Ltd 2011 Drawn		DATE	REV
EXISTING ELEVATION			
Project REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE			
Client PEMBROKE COAST NATIONAL PARK			
PEMBROKE DESIGN			
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* UNREGISTERED ARCHITECTS BUILDING SURVEYORS 47 BROWN PLACE 5th FLOOR 54th AVE 01437 79471 01437 79471 01437 79471		0 CONSULTING ARCHITECTS BUILDING SURVEYORS 14 SPAIN STREET 10th FLOOR 01297 33471 01297 33471 01297 33471	
Designed	Scale	Original Size	Job No
CJ	1:100	A3	8389
Drawn	Date	Checked by	Draw No Rev
MWS/CJ	12-11	CJ	E06



INTERNAL ELEVATION (EAST WALL) 1:100

Pembroke Coast National Park Authority
 17 JAN 2012
 Auckland Park, Gauteng
 Johannesburg

REVISIONS NOTES.	DATE	REV
1 Pembroke Design Ltd 2011		
PROPOSED ELEVATION Project REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE		
Client PEMBROKESHIRE COAST NATIONAL PARK		
PEMBROKE DESIGN L I M I T E D		
CHARTERED ARCHITECTS 1/7 PETER PLACE TEL: 0107 764133 FAX: 0107 764171 www.pembroke.co.za	0 PEMBROKE LOCK 10 LINDA STREET TEL: 0104 8343 FAX: 0104 8100	0 CANTONMENT 76 SPUR STREET TEL: 0187 2347 FAX: 0187 23471 0 QUANTITY SURVEYORS 0 SURVEYORS 0 PLANNERS
Designed CJ	Scale 1:100	Original Size A3
Drawn MWS/CJ	Date 12.11	Checked by CJ
		Job No 8389 Draw No P04

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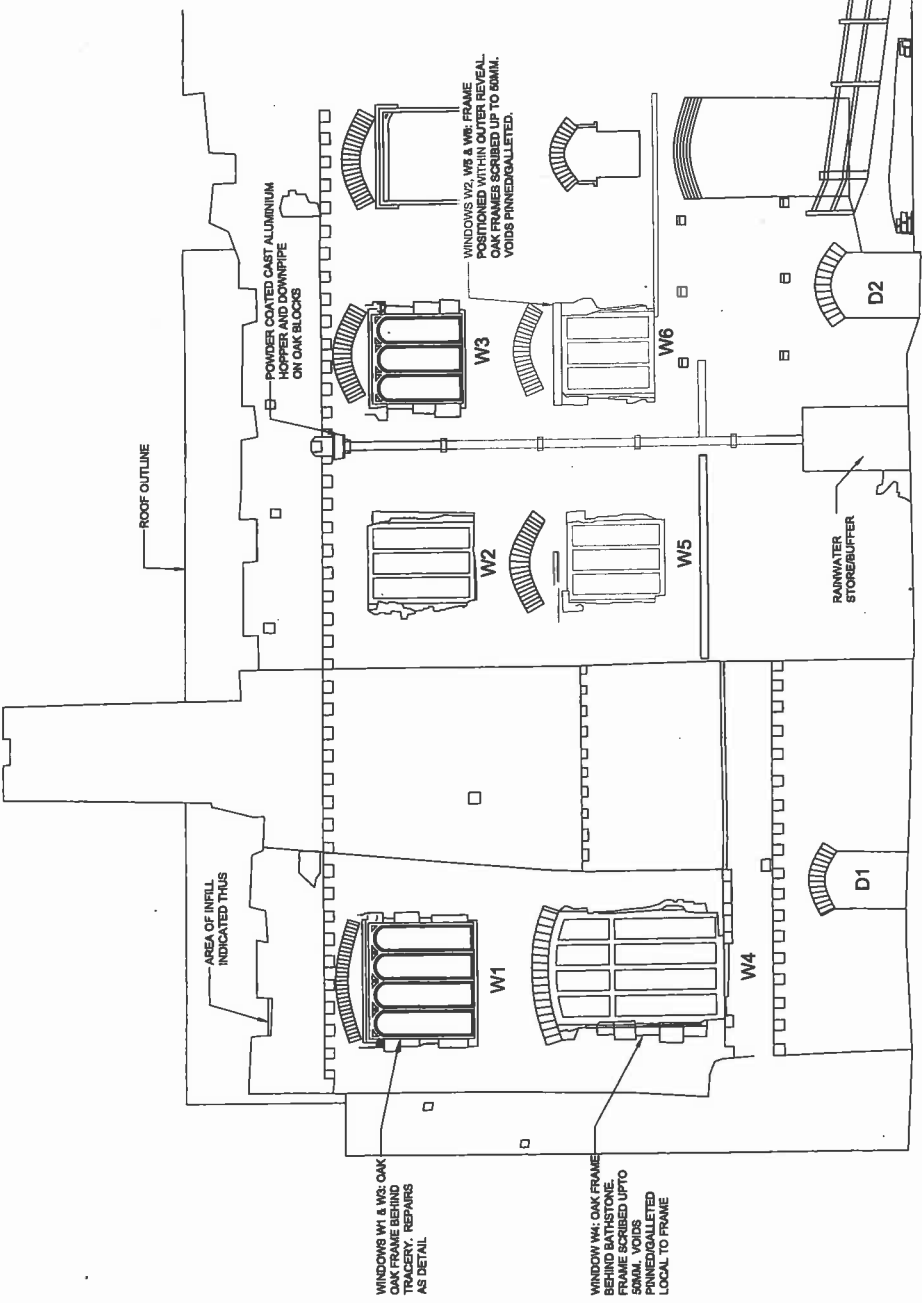
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The finished building will require regular maintenance in accordance with custom and practice and the manufacturers recommendations.

The architects drawings are to be read in conjunction with the engineers and all specialist manufacturers / suppliers drawings



WEST ELEVATION 1:100

Pembroke Castle
 Historic Park Authority
 17/11/2011
 The Historic Park Authority

MP 12 0 4 8

REVISIONS NOTES	DATE	REV
Drawn Pembroke Design Ltd 2011		
PROPOSED ELEVATION Project REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE		
Client PEMBROKESHIRE COAST NATIONAL PARK		
PEMBROKE DESIGN L I M I T E D		
Drawn MWS/CJ	Scale 1:100	Original Size A3
Designed CJ	Date 12.11	Checked by CJ
Job No 8389	Draw No P05	Rev

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 SURVEYORS
 SURVEYORS
 SURVEYORS
 CDM
 2-00-BEHAVIOUR



AERIAL VIEW

Pembroke Castle
 17 JAN 2012

NP 12 0 48

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REVISIONS NOTES.

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DATE REV

Drawn
PROPOSED AERIAL VIEW

Project
REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE

Client
PEMBROKESHIRE COAST NATIONAL PARK

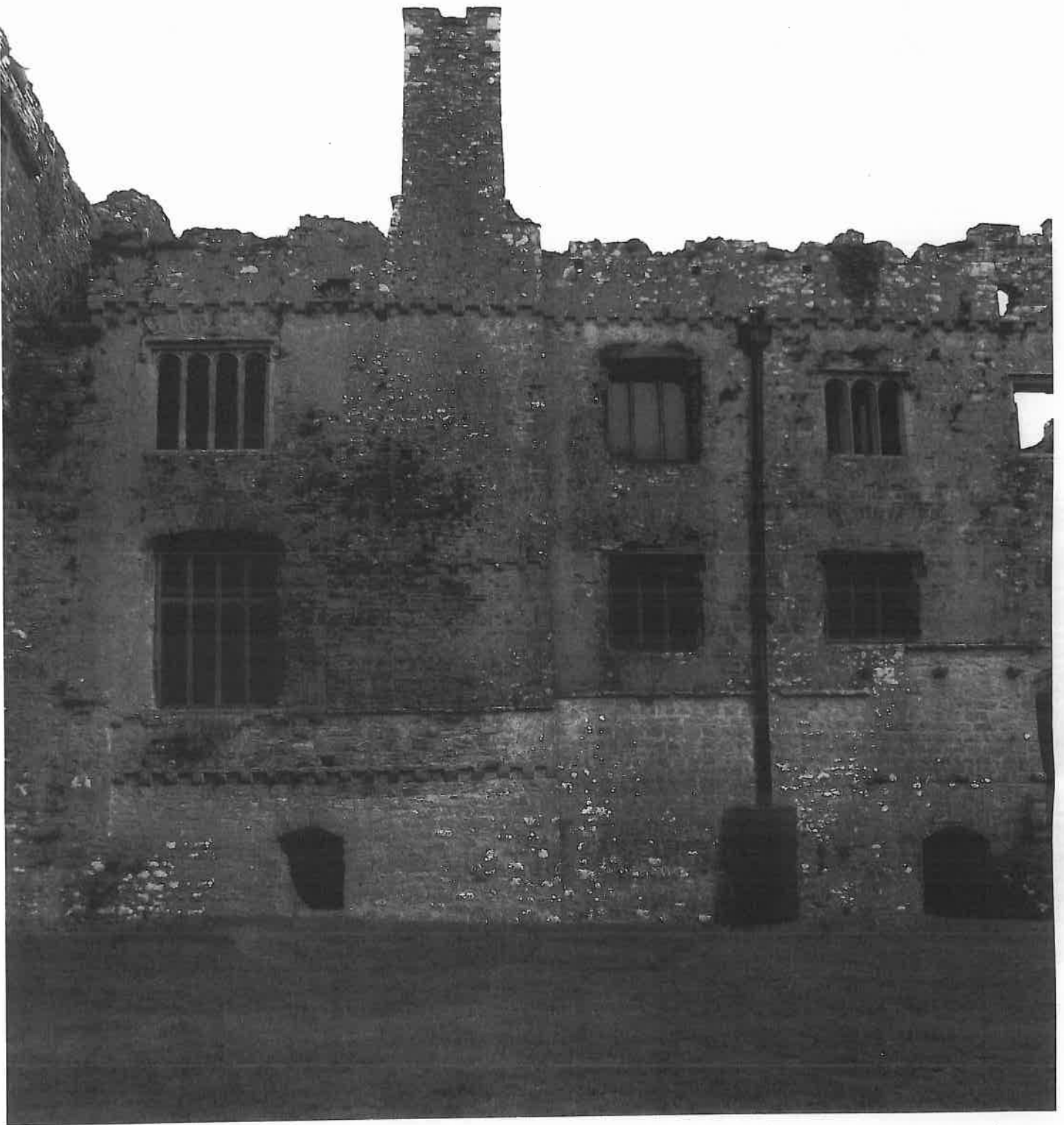
PEMBROKE DESIGN

L I M I T E D

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 5/7 PERIN PLACE
 26 STALLEN STREET
 CARMARTHEN SA31 3BA
 TEL: 01497 23412
 FAX: 01497 23471
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Designed	CJ	Scale	NTS	Original Site	A3	Job No	8389
Drawn	SD/JMT/CJ	Date	12.11	Checked by	CJ	Draw No	Rev
							SK02.

CO-ORDINATOR
 QUANTITY SURVEYORS
 SURVEYORS



PROPOSED WEST ELEVATION

Pembrokeshire Coast
National Park Authority
17 JAN 2012

NP 12 0 48

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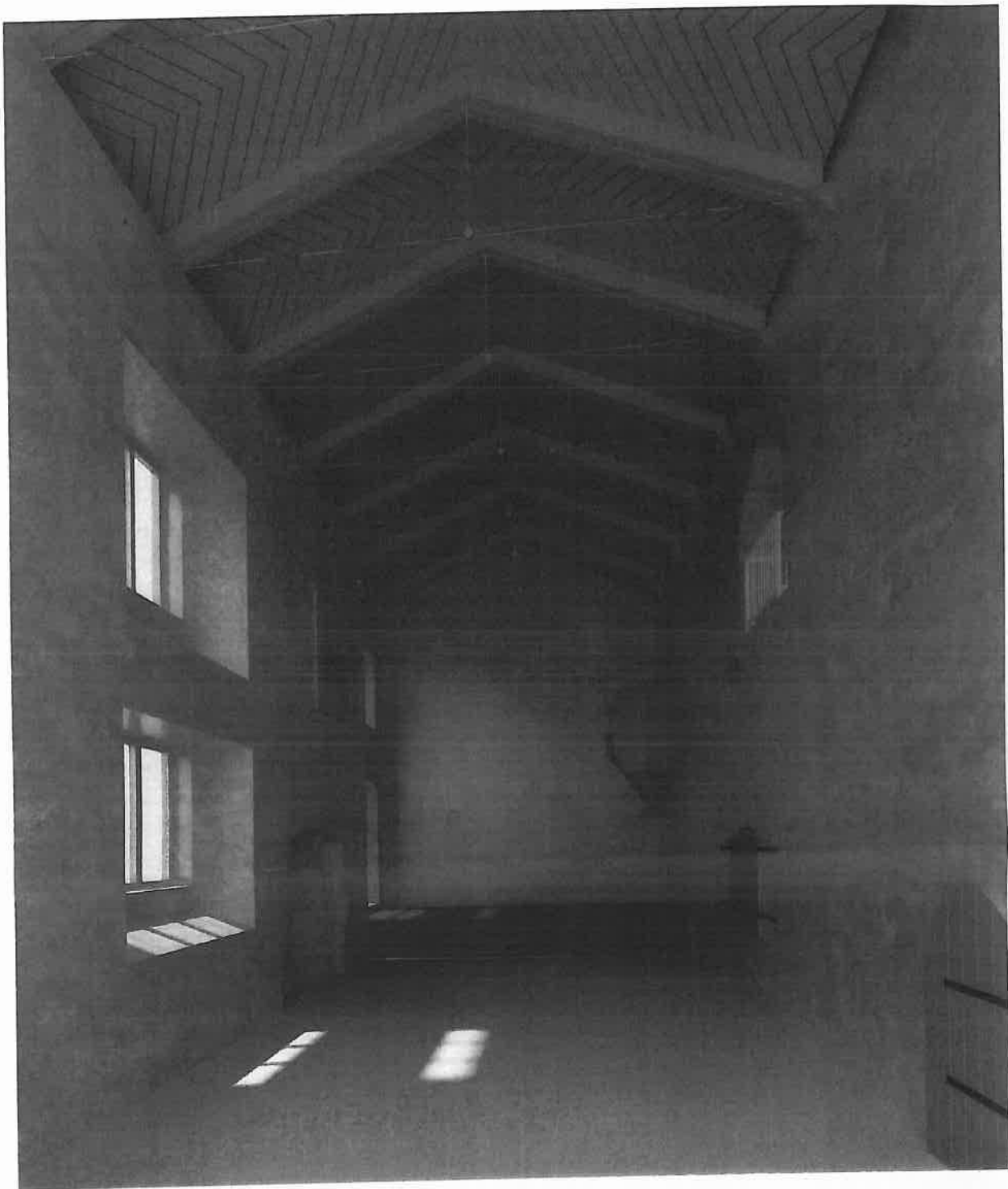
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REVISIONS NOTES.		DATE	REV
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Drwg PROPOSED WEST ELEVATION			
Project REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE			
Client PEMBROKESHIRE COAST NATIONAL PARK			
PEMBROKE DESIGN			
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● HANFORDWEST 5/7 PICTON PLACE SW1 2LE TEL: 01457 764135 FAX: 01457 764471 hand@pembrokedesign.co.uk		○ PEMBROKE DOCK 18 NEWTON STREET SA72 8JF TEL: 01646 883430 FAX: 01646 881363 pdc@pembrokedesign.co.uk	
○ CARMARTHEN 28 SPLAWN STREET SA31 1LD TEL: 01267 253412 FAX: 01267 253471 carm@pembrokedesign.co.uk		CHARTERED ARCHITECTS BUILDING SURVEYORS QUANTITY SURVEYORS COM COORDINATORS	
Designed CJ	Scale NTS	Original Size A3	Job No. 8389
Drawn SD/JMT/CJ	Date 12.11	Checked by CJ	Drwg No Rev SK03 .



INTERNAL PERSPECTIVE

Pembrokeshire Coast
National Park Authority
17 JAN 2012

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REVISIONS NOTES.			DATE	REV
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Drawn INTERNAL PERSPECTIVE				
Project REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE				
Client PEMBROKESHIRE COAST NATIONAL PARK				
PEMBROKE DESIGN				
L I M I T E D				
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<small> info@pembrokedesign.co.uk www.pembrokedesign.co.uk central@pembrokedesign.co.uk </small>				
Designed CJ	Scale NTS	Original Size A3	Job No 8389	
Drawn SD/JMT/CJ	Date 12.11	Checked by CJ	Draw No Rev SK04 .	

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SURVEYORS
CDM
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MP 12048

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REVISIONS NOTES. DATE REV
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PROPOSED CONSTRUCTION ACCESS

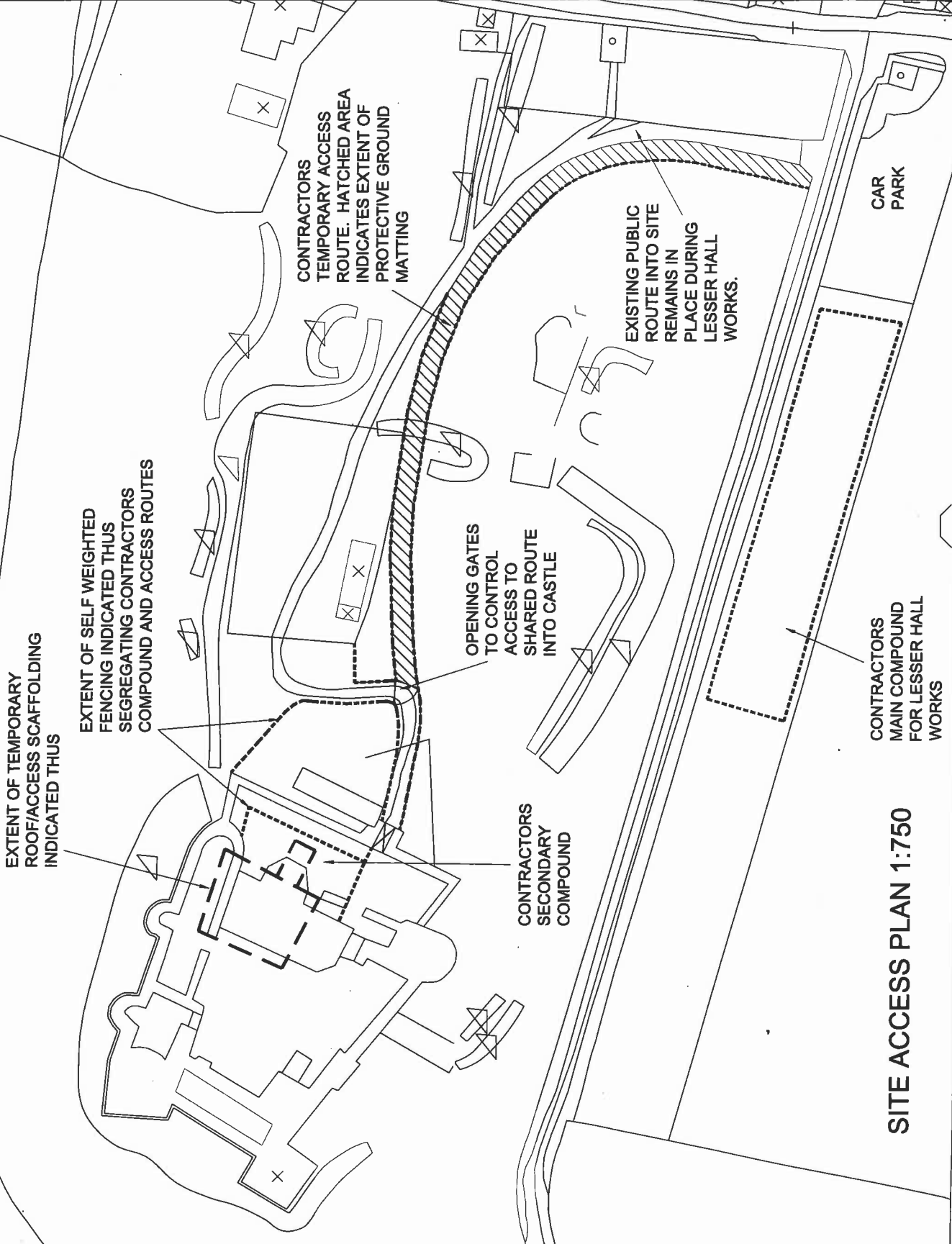
Project
 REPLACEMENT ROOF, WINDOWS AND DOORS TO THE LESSER HALL AT CAREW CASTLE

Client
 PEMBROKESHIRE COAST NATIONAL PARK

PEMBROKE DESIGN
 L I M I T E D

CHARTERED ARCHITECTS
 16 PEMBROKE STREET
 PEMBROKE, Pembrokeshire, SA20 9BA
 TEL: 01437 21414
 FAX: 01437 21415
 www.pembroke-design.co.uk

Scale 1:750
 Original Size A3
 Date 12.11
 Drawn CJ
 Checked by SK06
 Job No 8389
 Draw No Rev SK06



SITE ACCESS PLAN 1:750