
Application Ref: NP/13/0434

Application Type	Full
Grid Ref:	SM82820748
Applicant	St Ishmaels Garden Centre
Agent	Mr J Bratherton, Bratherton Park Design Consultants
Proposal	Demolition of existing redundant glass house & associated buildings, replacement of existing garden centre buildings, plus development of 18 timber clad built lodges for holiday purposes in a landscaped setting.
Site Location	St Ishmaels Nursery, St Ishmaels, Haverfordwest, Pembrokeshire, SA62 3SX
Case Officer	Liam Jones

Summary

This application has been referred to the Development Management Committee at the discretion of the Head of Development Management as it is a Major Development and a Departure from the Adopted Local Development Plan.

The application proposes the demolition of existing redundant glasshouses and associated buildings, the replacement of the existing garden centre buildings with new ones, plus the erection of 18 timber clad holiday lodges in a landscaped setting at St Ishmael's Nursery, St Ishmaels. The proposal has been carefully considered against the relevant Local and National development plan policies and all relevant material considerations have been taken into consideration. As a result and on balance the application is recommended for refusal for two reasons.

The first reason is that the scheme providing for the erection of 18 new holiday lodges in an area of countryside is contrary to policies 7, 35, 37 and 38 of the Adopted Local Development in that the policies do not allow for the erection of new holiday accommodation in the National Park. There are exceptions to this policy including where a scheme involves the conversion of existing buildings in the countryside, where a proposal involves the erection of holiday accommodation within a centre on a brownfield site and where a changeover from camping/caravanning to self-catering accommodation is proposed. However, the scheme fails to accord with the exceptions set out in the adopted policy. The second reason is that the proposed chalets by virtue of their siting, location and design will unacceptably change the character and appearance of the land within the National Park which will be harmful to its special qualities. As a result the development fails to accord with policies 8 and 15 of the Local Development Plan.

The applicant has put forward material considerations to suggest that this is a unique site adjacent to an existing centre which would not set a precedent, brings employment benefits and that it would result in better tourist quality accommodation in this particular area of Pembrokeshire. In addition the

Authority is in receipt of a petition from residents of St Ishmaels and further afield with support for the development. However, the material considerations put forward are not considered to be sufficient to outweigh the harm or policy position in this instance and this development is therefore recommended for refusal.

Consultee Response

St Ishmaels Community Council: No objection

Dwr Cymru Welsh Water: No objection

Ecologist - Pembrokeshire County Council: No objection

PCC - Head of Public Protection: Conditional Consent

PCC - Transportation & Environment: Conditional Consent

Natural Resources Wales: No objection

CADW - Welsh Historic Monuments: No objection – the development will not be of more than local impact on the area

Public Response

The application was advertised both in the Local Press as a Major Application and through display of site notices dated 9th October 2013 at the site. To date no letters of objection to the scheme have been received although a letter of support has been received from the MP for Preseli Pembrokeshire as well as a petition with signatures of 470 people in support for the proposals.

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 09 - Light Pollution

LDP Policy 11 - Protection of Biodiversity

LDP Policy 13 - Historic Landscapes Parks and Gardens

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 37 - Self-Catering Development

LDP Policy 38 - Camping, Touring Caravans, Statics and Chalet Sites

LDP Policy 42 - Employment Sites and Live/Work Units

LDP Policy 45 – Affordable housing
LDP Policy 49 - Retail in the National Park
LDP Policy 51 - Garden Centres
LDP Policy 52 - Sustainable Transport
LDP Policy 53 - Impacts on traffic
PPW5 Chapter 03 - Making and Enforcing Planning Decisions
PPW5 Chapter 04 - Planning for Sustainability
PPW5 Chapter 05 - Conserving and Improving Natural Heritage and the Coast
PPW5 Chapter 06 - Conserving the Historic Environment
PPW5 Chapter 07 - Economic Development
PPW5 Chapter 08 - Transport
PPW5 Chapter 10 - Planning for Retailing and Town Centres
PPW5 Chapter 11 - Tourism, Sport and Recreation
PPW5 Chapter 12 - Infrastructure and Services
PPW5 Chapter 13 - Minimising and Managing Environmental Risks and Pollution
SPG05 - Sustainable Design
SPG06 - Landscape
SPG08 - Affordable Housing
SPG12 - Parking
SPG13 - Archaeology
TAN 02 - Planning and Affordable Housing
TAN 04 - Retailing and Town Centres
TAN 05 - Nature Conservation and Planning
TAN 06 - Planning for Sustainable Rural Communities
TAN 12 - Design
TAN 13 - Tourism
TAN 18 - Transport
TAN 22 - Planning for Sustainable Buildings

Officer's Appraisal

Background

This application is a re-submission of a scheme refused by the Authority in March 2013 (NP/12/0550). Although described as being for 'holiday lodges' the Authority noted the development comprised of timber clad moveable lodges which were akin to caravan units and the creation of a caravan park. The application was resultantly refused for 3 reasons which were set out in the committee report and detailed on the decision notice. The reasons being that the principle of development for a caravan park on land not previously in

use for holiday accommodation in the open countryside is contrary to adopted development plan policy, the caravans due to their siting, location and design would form a visually intrusive and discordant addition to the rural area and finally that the application was not supported with a sufficiently detailed landscaping plan to allow the impact of the proposal to be fully considered on the special qualities of the National Park.

This new application, which again proposes 'holiday lodges', seeks to change their form from moveable caravan units to fixed chalet units. The application also removes a portion of land formerly proposed as a picnic/recreation/wildlife area in connection with the site which is located to the west of the site.

History

- NP/12/0550 – Demolition of existing redundant glasshouses & associated buildings, replacement of existing garden centre buildings, plus siting of 18 timber clad lodges for holiday purposes in a landscaped setting and provision of picnic and ecological improvement areas – Refused – 20th March 2013
- NP12/0596 – Environmental Screening Opinion for the current application – an Environmental Impact Assessment was not required – 21st December 2012;
- NP10/349 – outside the site but immediately adjacent to its north-eastern corner - Managers house (renewal of consent) – Refused – 30th September 2010
- NP07/362 – Managers house (renewal of consent) – Approved - 30th August 2007
- NP04/620 – Telecommunications mast – Refused – 16th December 2004
- NP03/636 – Managers house and new private access – Approved – 11th August 2003
- NP03/572 – Managers house – Withdrawn 21st November 2003
- NP01/060 – Conservatory over front entrance of garden centre – Approved – 20th March 2001

Constraints

The site lies within the open countryside in a Historic Landscape. To the north of the site is a Scheduled Ancient Monument.

Current Proposal

The application proposes the demolition of an existing glass house building and other associated buildings, development comprising of 18 No. timber clad built lodges proposed to be used for holiday purposes and replacement of existing garden centre buildings with a new purpose built garden centre building.

18 timber clad built lodges

The lodges are proposed to replace the existing structures on site and are positioned around a central open space with a pond. The site would make use of the existing access road with connections to the lodges from the front and rear of the site. The plans advise that the entrance would contain a 'private gated entrance'. Each lodge proposed measures 12.2m by 6.1m in floor area and there are six lodge types proposed across the site. A single parking space is allocated to each chalet and these spaces are positioned in a varied layout throughout the site.

Each lodge has internal accommodation comprising a lounge/dining area, kitchen, bathroom, two bedrooms and one ensuite. The elevation detailing in regard to window and feature positioning varies across the six lodge types, however, the principal finishes comprise of horizontal timber cladding to the walls, natural local grey stone to the chimneys proposed for a log burner and a cedar shingle roof.

The applicant advises that land which was included in the previous application to the west of the site has been removed from the application; however, it is still forms part of the land owned in connection with the development and does include proposals for three scrape ponds, a sewage treatment plant and pond/soakaway.

Replacement of garden centre buildings

The application proposes the demolition of the existing garden centre buildings and replacement with a new building. The existing building comprises a mix of form including a flat roof building and conservatory/porch. Plans show the replacement building to be positioned across a similar floorspace although with slight extension to the rear. The building at its maximum extent would measure 27m x 19.6m x 4.2m to ridge height. The existing fabric building to the north-west of the shop would be replaced with a polytunnel. The building is proposed to be finished in natural cedar timber cladding and a sedum plant/cedar shingle roof.

External sales areas would remain to the east and north of the shop, whilst the existing plastic mesh polytunnels would be removed. Opening hours for the garden centre would be between 09.00 and 17.30 every day in the summer including bank holidays and Sundays. In the winter the hours would be reduced to between 10.00 and 16.00. A Retail Impact Assessment has been provided and this identifies that the same goods would be sold as

presently offered including a list of products that you would expect to be found at a garden centre including plants, pots, compost, tools, clothes etc...

Landscaping

The landscaping proposals put forward a detailed scheme with the provision of hedgerows surrounding each chalet and the site on a whole. The applicant states that this will be managed by the applicant rather than the individuals owning the lodges in order that it is maintained as an entity rather than resulting in ornamental untidiness.

Supporting Information

The application has been supported with the following submissions;

- Retail Impact Assessment
- Planning Statement which includes;
 - o Ecological Assessment
 - o Landscaping and Arboriculture Report
 - o Archaeology Report
 - o Demolition Method Statement
 - o Transport Statement
 - o Drainage and Other Instruction Information
 - o Socio Economic Considerations
 - o Financial Justification; and
 - o Design and Access Statement

Key Issues

The application raises the following planning matters:

- Principle of the development and planning history
- Impact on the special qualities of the National Park and landscaping
- Protection of employment sites
- Impact upon historic landscape
- Highway safety and parking
- Protected species and habitats
- The water environment and drainage
- Contaminated land
- Sustainable development
- Neighbouring amenity
- Other material considerations

Principle of the development and planning history

This application is a re-submission of a scheme refused by the Authority in March 2013 (NP/12/0550). This was refused for 3 reasons which were set out in the committee report and detailed on the decision notice. These reasons were as follows;

1. Policies 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan state that new camping, caravanning, static caravan or chalet sites will not be permitted notwithstanding that the site is a brownfield site. The provision of eighteen static caravans on a site not previously in use for holiday accommodation in an open countryside location is therefore contrary to adopted Development Plan Policy.
2. Policies 8, 15, 29 and 30 of the Pembrokeshire Coast National Park Local Development Plan seek to protect and enhance the pattern and diversity of the landscape, and prevent development that fails to harmonise with or enhance the landform and landscape character of the National Park, that fails to incorporate traditional features, and that is insensitively and unsympathetically sited within the landscape and visually intrusive. The proposed holiday static caravans (and the associated ancillary development to them), due to their siting, location, and design, form a visually intrusive and discordant addition to this rural area that is harmful to the special qualities of the National Park and therefore contrary to Adopted Development Plan Policy.
3. Policies 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. The application has not been submitted with a sufficiently detailed landscaping plan to allow the impact of the proposal to be fully considered on the special qualities of the National Park, and it is therefore considered contrary to Adopted Development Plan Policy.

It is therefore clear that the Authority objected to the principle of the provision of eighteen static caravans on the site with particular reference to policies 35 and 38 of the Local Development Plan ('LDP') which doesn't allow any new camping, caravanning or chalet sites. A second reason for refusal was noted as being the impact of the development upon the special qualities of the National Park. The third reason focused on the lack of landscaping details to support the application.

It is relevant for the purposes of policy as set out in the Authority's Adopted Local Development Plan ('LDP') that the site lies in an area of open countryside in view of it being outside an accepted Centre of the LDP. The site is presently occupied by a garden centre nursery. In policy terms new development in the open countryside is strictly controlled by both national and local development plan policy.

Policy 7 is the relevant starting point in that it advises what forms of development in countryside locations will be acceptable. This includes sensitive infilling of gaps to isolated groups of dwellings, housing for essential farming or forestry needs, conversion of appropriate buildings to a range of uses with affordable housing given priority and accessibility being an

important consideration, tourist attractions or recreational activity where the need to locate in the countryside is essential, the enhancement of community facilities, low impact development making a positive contribution and new farm buildings.

In terms of the policy wording the proposal for 18 new timber clad lodges is not a tourist attraction or a recreational activity. Each of the lodges would provide internal accommodation comprising a living/dining area, two bedrooms, ensuite and bathroom and would provide self-catering accommodation. Policies 35, 37 and 38 of the Local Development Plan are each therefore relevant and set out the basis for considering applications for self-catering accommodation. The policies read as follows;

Policy 35 VISITOR ECONOMY (Strategy Policy)

To attract visitors outside the peak season while ensuring that National Park environment is conserved and enhanced as a landscape of national and international importance by:

a) Not allowing any additional camping, caravanning or chalet pitches but allowing change over to other forms of self catering where the site lies within a Centre and the scheme results in environmental benefits in terms of layout, design and materials used. (See Policy 38 and Policy 39)

b) Protecting against the loss of hotels and guesthouses unless it is proven that their continued use would not be viable or that peak demand can continue to be met in the locality. (See Policy 36)

c) Only permitting self catering accommodation on brownfield sites in the Local Development Plan's Centres and in conversions in the countryside except where an affordable housing need has been identified. Affordable housing provision will be given priority over self catering where such a need is identified. (See Policy 37)

d) Permitting visitor attractions, recreational and leisure activities in the Local Service and Tourism Centre and the Local Centres. Proposals outside these Centres will need to demonstrate why a 'Rural Centre' or 'Countryside' location is essential. Countryside proposals should make use of existing buildings whenever possible.

e) Directing shore based facilities to the developed stretches of coast where compatible with adjacent uses. (See Policy 17)

Activities which would damage the special qualities of the National Park will not be permitted. – see also Policy 8.

Policy 37 Self-Catering Development

Proposals for holiday cottages, flats and other forms of self-catering development will only be permitted where:

a) the proposal is on a brownfield site in a Centre or is a conversion proposal in a countryside location (see Policy 7) or is the result of a changeover from

camping/caravanning to self catering accommodation in Centres (see Policy 45), and

b) there is no need for affordable housing provision in the area or

c) the site or building is not appropriate for affordable housing provision.135

New build self-catering development on greenfield sites will not be permitted.

Policy 38 Camping, Touring Caravans, Statics and Chalet Sites

New camping, caravanning, static caravan or chalet sites or the extension of existing sites either by an increase in the number of pitches or enlargement of the approved site area will not be permitted.

Exceptionally, static caravan and chalet site areas may be enlarged where this would achieve an overall environmental improvement, both for the site and its setting in the surrounding landscape.

Policy 35 sets out clearly that no new camping, caravanning or chalet pitches will be allowed. The only exceptions to this policy are proposals for self-catering accommodation on brownfield sites within Centres and the conversion of appropriate buildings within the countryside. Policy 37 reiterates this with clear wording which states that proposals 'will only be permitted' where the proposal is on a brownfield site in a Centre or is a conversion proposal in a countryside location. The policy further states that proposals which will result in a changeover from camping/caravanning to self catering accommodation in Centres will be permitted

In the case of the proposals before the Authority it is clear that the proposals do not involve the conversion of appropriate buildings into new uses, do not involve self-catering accommodation on a brownfield site within a Centre and do not involve proposals to change from a camping/caravanning use to self catering accommodation. As such, similarly to the view of the Authority taken in refusing a similar application at the site in March 2013, albeit for a caravan type development, the development proposed is contrary to the policies contained within the Local Development Plan.

The justification for these policies is set out in paragraph 4.168 of the LDP which states that the National Park occupies 37% of the total land area of the County, but already accommodates 56% caravan, camping and chalet sites. There remain over 400 vacant pitches within existing holiday parks and sites. This gives an indication of the high level of overall provision already available and the policy approach therefore seeks to protect the National Park landscape; control over-domination of this sector of tourist accommodation which is clearly already extensively available; and to support existing businesses, which also have some capacity to react to increases in demand.

The Authority has been consistent in advising the applicants of this policy and the justification for it in regard to this particular scheme and offered pre-application advice in 2009 explaining that the principle of development of the

site to include a proposed lodge development was not acceptable as it was directly in conflict with local and national planning policies.

The applicant has stated that the proposal allows for redevelopment of the vacant nursery buildings, and that as the site is a brownfield site in the open countryside, it should be allowed on the basis of the environmental improvement that it offers. A consideration of all material considerations appertaining to this scheme is given in the below paragraphs.

Impact on the special qualities of the National Park and landscaping

Policy 8 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. 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. Criterion 'c' resists development that would introduce or intensify a use which is incompatible with its location. 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').

Replacement garden centre

Provision of Replacement Garden Centre Buildings

The proposed replacement garden centre building seeks to amalgamate the existing eclectic mix of buildings with their differing form, styles and materials into a single purpose built building. The existing buildings have little architectural merit and form a discordant grouping of elements at the site. The building proposed would be constructed of cedar timber cladding under a sedum/cedar shingle roof. In terms of visual impact the replacement structure can be considered an improvement upon the existing buildings in terms of design and appearance and use of materials. The scheme would provide a purpose built building that is visually cohesive and more sympathetic to countryside location than the existing buildings. The development with use of natural materials would reduce the visual harm to the special qualities of the National Park. Subject to conditions concerning materials no objection is raised to this aspect of the proposal.

Impact of retail use

Policy 51 of the Local Development Plan states that garden centres will be permitted where the proposal is located within or adjacent to a centre; and it

would not undermine the vitality and viability of retail facilities in any nearby centre; and the scale and nature of any buildings proposed for retail use and the size, design, materials and siting of any new building or extension blend with existing buildings. In the supporting text for the policy it advises that planning conditions may be applied to limit the range of goods which can be sold from the premises so as to protect the viability and vitality of existing centres and local shops.

The existing garden centre has been in existence for some years, although there does seem to have been a mixed use operating on the site. It has previously been used as a nursery, then a nursery and garden centre and now just the garden centre uses are operating. In 2001 a conservatory to the garden centre was permitted with no question being raised as to the function of the site: ie., whether it is a nursery and / or garden centre. In view of the Authority's previous acceptance of applications for the site being a garden centre, it is considered that this planning history is material to the consideration of the current use on the site, which from your officer's site inspection and that of the former officer in considering the merits of application NP/12/0550 is clearly as a garden centre with no nursery activity occurring.

The current scheme is to replace the existing garden centre buildings with new ones, which as discussed in the section above, offer a substantial visual improvement to those already present. As a result the proposal is considered acceptable under the requirements of Policy 51, in that the size, materials and design of the new building is considered acceptable. However, as both the existing and proposed garden centre offers a mix of products for sale, if permission were to be granted conditions would need to be attached restricting sales to garden centre goods only so as not to undermine the vitality and viability of nearby centres. The applicant has provided a Retail Impact Assessment whilst specifies the current products for sale and has suggested in a submitted email that they would be happy to negotiate the range of products to be provided.

Holiday lodges

The lodges would be positioned around a central pond area with access roads to the east and west. The removal of the existing large vacant greenhouse buildings could be seen by many as a general improvement to visual amenity of the area, however, in its place a more urban environment would be created that has the potential to impact upon the special qualities of the National Park. The need to consider this impact is particularly pertinent with regard to the policies contained in the Local Development Plan that aim to protect the special qualities of the National Park.

Although the greenhouse buildings have a large footprint they are of a single storey nature and have a typical form that is functionally agricultural. These types of buildings are commonly found in a countryside setting. Whilst the applicant has put forward a new landscaping scheme which involves various hedgerow planting proposals around the site and proposed lodges this will not

overcome the fact that the character of the site will change quite considerably. This was noted by officers in the report presented to members as part of the previous planning application (NP/12/0550) whereby it was not felt that the provision of additional landscaping could ameliorate the fundamental harm that the proposal results in.

The character of the site will change from one that is predominantly agricultural to one that effectively creates a holiday park comprising of 18 independent lodges with associated roads, parking and garden areas. Although it may not be prominent from outside the site along the main highway, due to existing and proposed vegetation cover, the site will be very apparent at the entrance and as a result will subsequently erode the rural character of this site. The residential form and appearance of the land and the individual lodges would be at odds with its rural location and therefore conflict with the aims of Policy 8 criterion a) which prioritises protection and enhancement of the sense of remoteness and tranquillity and criterion c) which prioritises protection and enhancement of the pattern and diversity of the landscape.

With regard to the design of the individual lodges whilst it is noted that their form has changed from typical log cabins with vertical wooden boarding to built chalets the design put forward is not considered to be traditional to the character of the National Park nor one that is uniquely innovative. The mix of wooden and stone detailing, the layout and form of windows and door openings as well as the stone chimneys are not characteristic of traditional design within the National Park and results in an inappropriate trend of detailing which will have a detrimental impact upon the character and appearance of the site due to the unacceptable form of design. As such it is considered that the development conflicts with Policy 15 criteria b), c), d) and e) in that it will result in a development that is insensitively and unsympathetically sited within the landscape, will be incompatible with its location and fail to harmonise with, or enhance the landform and landscape character of the National Park and lose or fail to incorporate important traditional features.

Protection of employment sites

Policy 43 of the Local Development Plan states that permission to redevelop or use, business, general industrial, storage or distribution sites or buildings for other purposes will be permitted where the present use is inappropriate for the locality; or there is adequate alternative provision in the vicinity; or the potential for continued use of the site or premises has been shown to be unviable. A garden centre is recognised as being both a business and an employer. It is noted that the intention is to continue using part of the existing garden centre for that purpose, including a shop. Policy 43 requires justification for the loss of employment sites and where the loss can be justified, a community use or affordable housing provision is given priority. The applicant has stated that the proposed business would increase employment and would also provide some facilities within the community, namely the shop.

The application form states that there are currently 3 full-time and 1 part-time job provided by the nursery. Including the holiday lodges, this would increase to 6 full-time jobs, and 4 part-time ones, with the potential for upto 8 + further seasonal jobs as lodge cleaners. There is no objection therefore to raise with impact of loss of part of an employment site due to the fact that the development would allow redevelopment of the existing garden centre buildings and also provide some further employment opportunities at the site. However it should be noted at this point that the employment opportunities presented by this development are limited and are not considered to be capable of outweighing the lack of compliance with the policies set out above which seek to protect the countryside from development.

Impact upon historic landscape

Policy 8 of the Local Development Plan seeks to protect the special qualities of the National Park, including amongst other things, the protection and enhancement where possible of the historic landscape. Policy 13 refers to the presence of Historic Landscapes as a designation on the Proposals Maps, and the supporting text of this Policy requires consultation with Dyfed Archaeological Trust where development occurs in these designations. The site lies within a Historic Landscape, and there is a Bronze Age Standing Stone in the field to the north of the site, which is a Scheduled Ancient Monument (SAM). Dyfed Archaeology have been consulted, however, no response has been received to date. In the former application submission (NP/12/0550) Dyfed Archaeology considered the application and raised no objection subject to a conditional requirement for an archaeological watching brief. In addition, because of the proximity of the SAM to the site, they also suggested consulting CADW to ascertain whether the proposal would be harmful to it. CADW has been consulted as part of this submission and their response raises no objection to the development siting that it lies within historic landscape HLW (D)3 Milford Haven Waterway and that the development will not be of more than local impact on the area. In view of this it is considered that subject to a suitable condition to require a watching brief there would be no objection on grounds of impact upon the historic landscape.

Highway safety and parking

Policies 52 and 53 of the Local Development Plan refer to traffic impacts of proposed development, along with seeking to ensure that opportunities are taken to improve and promote accessibility and reduce the need to travel by car. Development will not be permitted where it will result in an unacceptable impact on congested areas; or where traffic will be generated at inappropriate times; or where there is an unacceptable impact on road safety; or where significant environmental damage would be caused and cannot be mitigated.

The application proposes the use of the existing access and internal distributor road for the garden centre, plus resurfacing of the existing car parking area for the garden centre. There is currently parking for 40 cars, and this would be retained. Each of the lodges would have its own car parking

space set throughout the site. The Highways Section at Pembrokeshire County Council have considered the application and raised no objection to it. They advise that in traffic terms there will be a reduction in staff and HGV traffic associated with the nursery business of growing plants for other garden centres and for supermarkets. They consider that the proposal would not result in a serious increase in overall traffic as a result of the mixed uses occurring, and that it is sufficiently close to facilities in St Ishmaels and Monks Haven to encourage walking or cycling. They advise that this would not be enough to trigger need to finance passing places or provide for a Section 106 Agreement and that the layout proposed for the access roads and parking for the lodges is considered to be acceptable.

Protected species and habitats

Policy 8 of the Local Development Plan seeks to protect the special qualities of the National Park, including amongst other things, the restoration and enhancement of the National Park's ecosystems. Policy 9 seeks to minimise light pollution. Policy 11 states that development that would disturb or otherwise harm protected species or their habitats will only be permitted where the effects can be acceptably minimised or mitigated.

The application was accompanied by a protected species report with an Extended Phase 1 survey, which was sent to the County Council's Ecologist for comment. The Ecologist advises that as long as the works are undertaken as per the recommendations in the survey report there are no objections to the proposal on ecological grounds. However lighting can impact on foraging or commuting bats and so should be as dim as possible, on a timber and not point at roost features or habitat corridors. Furthermore the applicant should ensure that vegetation clearance is undertaken outside the bird nesting season. In view of these comments it is considered that the development is acceptable on impacts upon protected species and habitats subject to suitable conditions to control any external lighting and vegetation clearance at the site.

Contaminated land

Chapter 13 of Planning Policy Wales (Edition 5) states that planning decisions need to take into account the potential hazard that contamination presents to the development, its occupants and the local environment, and whether any mitigation measures are needed. In view of the previous uses on the site, the Public Protection Section at County Hall were contacted to ascertain their views as to whether the proposal raised any concerns as regards public health protection. They consider that the previous uses could well have resulted in land contamination (eg through the use and storage of chemicals and fuels), and in view of the proposed lodges, have requested that if permission is granted a condition is imposed requiring a contamination assessment of the site if evidence of it is found.

Sustainable design

Both national and local Development Plan Policy requires sustainable design. Policy 29 of the Local Development Plan expects all proposals for development to demonstrate an integrated approach to design and construction, whilst Policy 31 requires development to minimise, re-use and recycle waste generated during demolition and construction and provide waste management facilities of an appropriate type and scale as an integral part of the development. Policy 32 requires sustainable drainage systems for the disposal of surface water. The application has been supported by a Demolition Statement and a Design and Access Statement that details the sustainable measures included within the proposal. As regards the demolition works, all materials that can be recycled will be, such as the metals and concrete. The proposed buildings would be provided with high levels of insulation and renewable energy provision, and locally sourced materials. Notwithstanding the concern raised in respect of the design of the chalets subject to conditions requiring compliance with the statements put forward, the proposal is acceptable in terms of the sustainable requirements of national and local Policy requirements.

Neighbouring amenity

Policies 29 and 30 of the Local Development Plan seek to protect community cohesion and health and to avoid incompatible development that would lead to a significant adverse impact upon amenity. The supporting text at paragraph 4.136 explains that the policy aims “to protect the amenity enjoyed in people in their residences, workspaces and recreational areas. Amenity is defined as those elements in the appearance and layout of town and countryside which makes for pleasant life rather than mere existence. Anything ugly, dirty, noisy, crowded, intrusive or uncomfortable is likely to adversely affect amenity”.

Policy 30 is a criteria based policy setting out that development will not be permitted where it has an unacceptable impact on amenity particularly where, a) the development is for a use inappropriate for where people live or visit and/or; b) the development is of a scale incompatible with its surroundings; and/or; c) the development leads to an increase in traffic or noise or odour or light which has a significant adverse impact; and/or; d) the development is visually intrusive.

The nearest residential properties are the dwellings to the north-east and south-east corner of the site, the latter being across the road from the site. The rebuilding of the garden centre buildings is occurring in approximately the same footprint as the existing buildings, and as a result causes no significant loss of amenity. The provision of the holiday lodges will impact on amenity of these properties in that it introduces a new use to the area, but in view of the distances between the proposal and them, it is felt that landscape conditioning could satisfactorily mitigate any noticeable impact.

Other material considerations

It is your officers view that as set out above the provision of holiday lodges at this site would be a clear departure from both national and local adopted policies. Section 38 of the Planning and Compulsory Purchase Act 2004 sets out that decisions on planning applications **must** be made in accordance with the development plan unless other material considerations indicate otherwise. Planning Policy Wales (November 2012, Edition 5) states that material considerations could include current circumstances, policies in an emerging development plan, and planning policies of the Welsh Government and the UK Government. Factors must be planning matters in that they must be relevant to the regulation of the development and use of land in the public interest, towards the goal of sustainability (Paragraphs 3.12 and 3.1.3).

In support of the application the applicant has accepted that the scheme of development does not comply with the full requirements of Policy 37. The site is a brown field site; however, it is not within an established centre and fails therefore fails on this basis. The applicant has put forward material considerations in an attempt to override the policy position both as part of the original application and in an email received by the Authority on 25th November 2013.

The original submission identified the socio economic considerations including local support for the proposal. The submission states "These proposals have the full support of the Local Community and offer opportunities to boost the facilities which are currently available in the area which have been diminishing over recent years in St Ishmael's, no doubt due to the recession" (Planning Statement, Page 20). The application documents submitted also include;

- Letter from the local MP Stephen Crabb dated 13th November 2009 and letter received 14th October 2013. The letters offer general support with the recent submission stating that this particular development will have a significant positive impact on the community whilst meeting the need for better range of quality tourist accommodation in the area.
- support from a firm of estate agents/surveyors in 2010.
- support from a Welsh Assembly Member.
- an email from the Tourism, Marketing and Development Manager at Pembrokeshire County Council advising that there are large quantities of accommodation in Pembrokeshire although that these are relatively little or the right quality.
- An article from the British Home Park and Holiday Association Magazine September/October 2009 which demonstrates the value and injection into the economy stemming from holiday accommodation such as lodges.

- A paper produced by St Ishmael's Community Council giving total support for the scheme.
- A document entitled 'St Ishmael's Toolkit Report' resulting from dialogue between Pembrokeshire Local Action Network for Enterprise and Development and St Ishmael's Community Forum. This identifies the lack of holiday homes, the significant potential for development at the Nursery. Garden Centre and the lack of shop and Post Office within St Ishmael's.

In addition to the above the Authority is in receipt of a petition signed by residents of St Ishmael's and the surrounding area. The petition holds a total of 470 names and explains that the reason of support for the application is that it will bring much needed employment into the area and contribute an estimated £5,000 - £10,000 per lodge per year to the local economy, will provide much needed accommodation to this particular corner of Pembrokeshire and benefits will be in line with the Pembrokeshire Destination Management Plan.

The case officer met with the applicants and their agent on 15th November 2013 in order to further understand the scheme put forward and discuss the policy considerations. This meeting was followed with an email which is attached at Appendix 1 to this report. The email discusses the local support which is apparent in the initial submission and following consultation and also explores other material considerations. The Authority's Development Plans Section has considered the material considerations in detail but do not consider, in this instance, that these outweigh the policy position such that would represent overriding circumstances.

Support locally for the project is noted, although this does not alter the policy situation or the legal requirement to determine applications in accordance with policy unless other material considerations indicate otherwise. If there are sound justifications for over-riding policy, for example, either to support or object to a proposal then it is just as valid if one person raises the support/objection as 100. Community support in this instance is a political matter and not of itself a material consideration that could justify a departure from the requirement to determine the application in accordance with policy. Para 3.1.8 of Planning Policy Wales (Edition 5, November 2012) advises:

"As a general principle, local opposition or support for a proposal is not, on its own, a reasonable ground for refusing or granting planning permission; objections or support must be based on valid planning considerations."

Similarly competition or otherwise with existing businesses is not, in itself a reason to refuse or grant permission.

Policy 37

The applicant acknowledges that the requirements of this policy are not met and suggests that this proposal is an exception because rarely are brownfield

sites so close to Centres. This statement is unfounded as there are any number of potentially similar sites on farms and other brownfield sites surrounding the identified Centres in the Park. Whilst this particular proposal involves an existing business and existing outbuildings this could be the situation throughout the National Park. The policy is specific in limiting self-catering accommodation on brownfield sites within Centres or through the conversion of appropriate buildings in the countryside and this is based on an evidence-based approach supporting the production of the LDP which was adopted in 2010.

The reasons for this approach are briefly:

- The sustainability objectives of the Welsh Government:
 - o To promote resource-efficient settlement patterns that minimise land-take; wherever possible avoiding greenfield sites;
 - o To locate development so as to minimise the need to travel, especially by car;
 - o To contribute to the protection and improvement of the environment
- The strategy of the Plan (again based on robust evidence) is to provide for affordable housing for which there is significant need in the National Park.
- Self-catering accommodation is already prevalent in the National Park (see background paper to the LDP on Enjoyment) and therefore there is a need to use the limited land available for development for essential needs, such as affordable housing.

An assertion is made in the correspondence received that Policy 37 is unworkable. Whatever the opinion on this matter, it is the adopted policy of this Authority, and is not available for debate as part of the application process. Contesting the content of the policy should be directed to the Local Development Plan Annual Monitoring Report or Review currently scheduled to commence 2014/15.

The comment made to support the statement is that “*self-catering lodges would not sit comfortably within an established Centre and is more suitable in outline districts....*” The comment cannot be justified in its own right as there are likely to be instances when in-Centre sites are considered appropriate. Each application would need to be judged on its merits.

The applicant has amended the application to provide fixed units, rather than mobile caravan-style units as proposed in the previous submission. However Policy 38 of the Local Development Plan does not allow for new camping, caravan or **chalet** sites. Chalets are commonly held as being

'A building/buildings, constructed of timber or more traditional construction materials, which is used for the purposes of providing holiday letting accommodation, which is or forms part of a managed site with communal grounds, and shared facilities and access.'

This application is therefore contrary to Policy 38 of the Plan in that the policy clearly states that new chalet sites will not be permitted regardless of their location.

In March 2013, this Authority adopted the Destination Management Plan. The Plan is the **key** document to guide service delivery in relation to tourism in the county and has been produced and **adopted** by the County Council, Pembrokeshire Tourism and the South West Wales Tourism Partnership. It embraces a wide variety of services across PCNPA, adopting a 'whole authority' approach to tourism, as part of a broader 'county-wide' approach, that is important to the long-term success of the visitor economy (Committee Report March 13).

The aim of the Destination Management Plan is to safeguard and grow the visitor economy in order to improve the contribution it makes to the economic well-being of the county. In relation to self-catering accommodation the aim is to:

- Support the continual improvement and upgrading of self-catering accommodation
- Support the continual improvement and upgrading of camping and caravanning accommodation

When compared with the aim for serviced accommodation which is to improve availability, the aim appears to be one of supporting improvement to the overall stock of accommodation on offer, but not to increase the amount.

The Policy approach set out in the LDP supports this stance by allowing upgrading of existing accommodation and holiday parks recognising the considerable numbers already available. Opportunities for additional facilities are limited to take account of this and to help prioritise other land uses for which there is an urgent and significant need. The policies seek to encourage changes within existing self-catering accommodation sites to provide for the requirements of today's visitors, as set out in the Destination Management Plan.

There are several statements of support for this application from businesses which market accommodation and the owner of an existing holiday park with 3 sites in Pembrokeshire. The reasons cited for their support are not location specific, i.e., they welcome a new 'high quality' development but this location is not critical to achieving that aim, as set out above. Statements relating to increasing visitor spend and employment of additional staff are regularly made to support proposals and they may prove fruitful for the immediate business and locality. However no account is made of whether this proposal will impact on existing businesses and with a surplus of accommodation available it is

likely that this will impact elsewhere, which is also a material consideration. Unsubstantiated statements cannot be accepted as fact, only as opinion.

It is noted that in paragraph 4.6 of the Transport Statement submitted with the application that the holiday lodges are aimed at private ownership for holiday letting or owner occupation rather than a letting fleet. The resulting offer of availability of this accommodation is therefore not guaranteed in that there is no guarantee of how many of the units will actually be available for letting as self-catering accommodation.

In relation to the arguments put forward in the support of the development it is noted that support appears to have been given in supporting documents provided to the expansion of the garden centre to provide for additional services such as a village shop and post office. For the avoidance of doubt it should be noted that the application put forward proposes a replacement building at the garden centre only and should planning permission be forthcoming for this element the Authority would have regard to Policy 51 and the need to ensure that the products to be sold are restricted to garden centre related products and not those of a local convenience store or post office. The reason for such conditions is in order to protect the vitality and viability of existing Centres. The applicant has agreed that the list of products to be sold could be stipulated and agreed through a planning condition. The premise of support appears to be based on a misconceived notion as to the offering of the expanded garden centre.

In view of the above points whilst the material considerations are noted they are not considered to be of such weight that they would justify overriding the policy position set out in the LDP which clearly restricts and prevents the creation of new chalet sites within the National Park. The following conclusions can therefore be given after having regard to the material considerations;

- i. Para 4.14 of the Planning Statement accompanying the application states that the scheme is now for lodges (rather than mobile units as was the case in the previous application). The 'lodges' however still meet the definition of chalets and remain contrary to Policy 38 of the Local Development Plan.
- ii. Notwithstanding the above, the development is a form of self-catering accommodation and the location does not meet the requirements of Policy 37 of the Plan. It is neither within an identified Centre, nor is it the conversion of appropriate buildings.
- iii. The additional evidence submitted by the applicant is considered in detail above but fails to provide a strong rationale for departing from the policies contained within the Plan.
- iv. The Destination Management Plans seeks improvement and upgrading and not the provision of additional self-catering accommodation.

- v. There is scope within existing holiday parks for upgrading to provide this type of accommodation and this proposal is not critical to achieving improvement and upgrading.
- vi. The employment opportunities presented by the development are limited and are not considered to be capable of outweighing the policy position.
- vii. With the intention of offering the accommodation for sale, there is no guarantee how many of the units will actually be available for letting as self-catering accommodation.

Conclusion

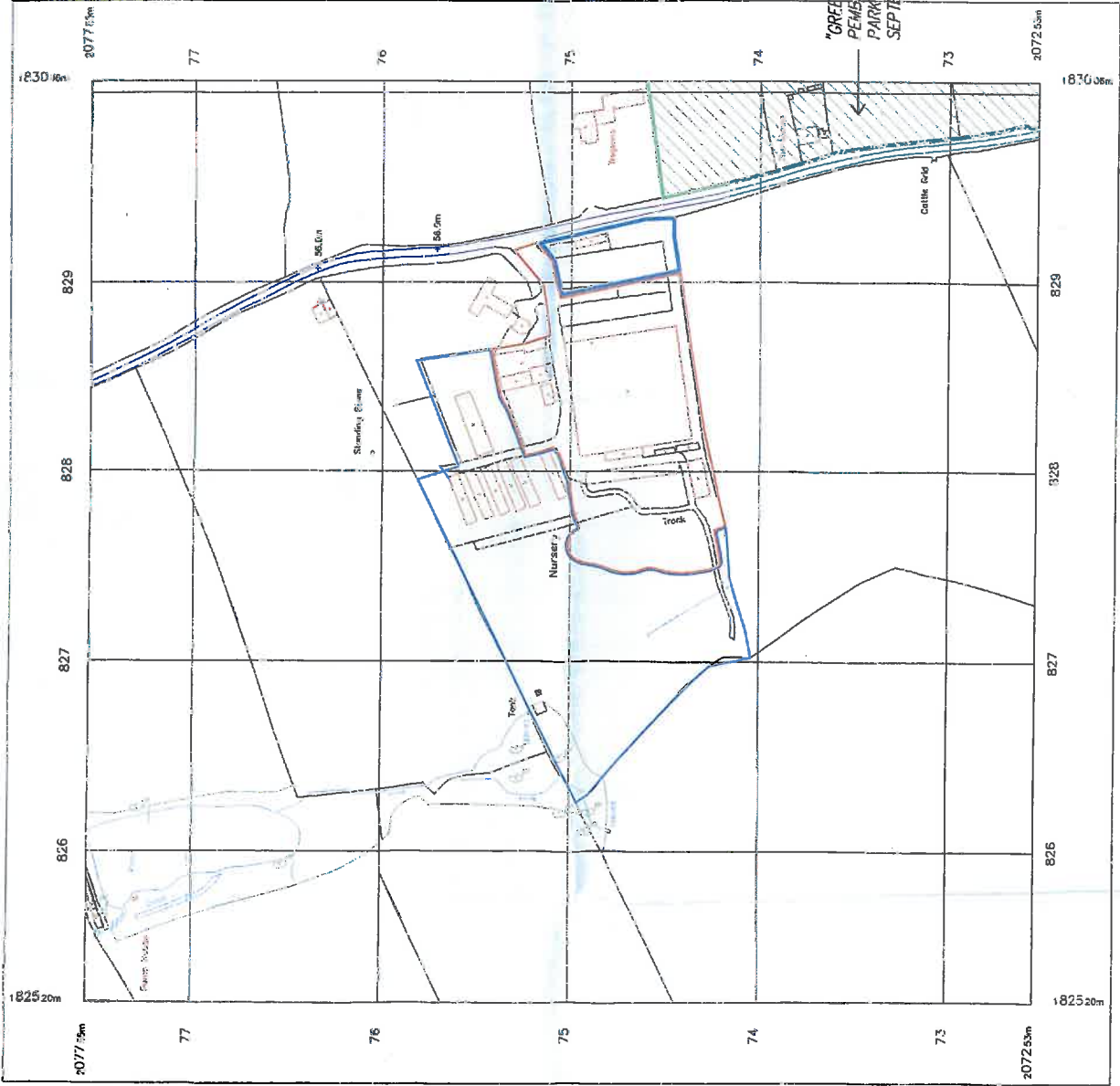
In summary of the above and following a detailed consideration of all material considerations and policy it is considered that the application fails to meet the aims and policy of the Local Development Plan. The adopted policy restricts new holiday lodges to protect the National Park landscape from further holiday sites. In addition the development will change the character and appearance of the land to one that is predominantly residential therefore harming its special qualities within the National Park. Consideration has been given to material considerations and whether they justify a departure from policy, as suggested by the applicant. The material considerations relevant in this case are not of sufficient weight to justify a departure from policy. If relied upon, they could set a precedent on a number of applications in countryside locations. The development fails to comply with policies 1, 7, 15, 35, 37 and 38 of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010) and is therefore recommended for refusal.

Recommendation

The application be refused for the following reasons:

1. The development by virtue of the proposals providing for eighteen chalet units on a site not previously in use for holiday accommodation in an open countryside location is contrary to the requirements of policies 35 and 38 of the Local Development Plan. Notwithstanding the fact that the site is a brownfield site Policy 35 identifies that the only exceptions include proposals on a brownfield site in a Centre, conversion proposals in a countryside location or the result of a changeover from camping/caravanning to self catering accommodation in Centre. Policy states that any new chalet sites will not be permitted. As such the development fails to comply with policies 35 and 38 of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).
2. Notwithstanding the proposals to remove and replace the existing glasshouses and the provision of a detailed scheme of landscaping in support of the proposals the development of the site to contain eighteen chalets by virtue of their siting, location and design results in a

typical urban environment which will be a visually intrusive and discordant addition to this rural area that will fail to respect the unspoilt surrounding countryside landform within the National Park. As such the development would be harmful to the Special Qualities of the National Park and is contrary to Policy 8 criteria a) and c) and Policy 15 criteria b), c), d) and e) of the Pembrokeshire Coast National Park Local Development Plan (Adopted September 2010).



KEY

— OWNERSHIP BOUNDARY

— APPLICATION SITE BOUNDARY

NE 13 4 314



REV	DESCRIPTION	DATE	INITIALS
B	BOUNDARY AMENDED	28/08/13	LD
A	BOUNDARY AMENDED	15/08/12	LD

Bratherton
PARK DESIGN CONSULTANTS
 Hollington Grange - Parkside Road - Hollington
 Chester - CH5 8NP
 T: 01244 853 000 • F: 01244 953 807
 E: parkdesign@bratherton.co.uk W: www.bratherton.co.uk

Item 6c)
ST. ISHMAELS,
HAVERFORDWEST,
PEMBROKESHIRE

LOCATION PLAN

DATE: 13/09/11	SCALE: 1:1250
DRAWN+LD	CHECKED
REV: 8	JOB: 1256/6

© Crown Copyright 2009
 Reproduction in whole or in part is prohibited
 without the prior permission of Ordnance Survey.

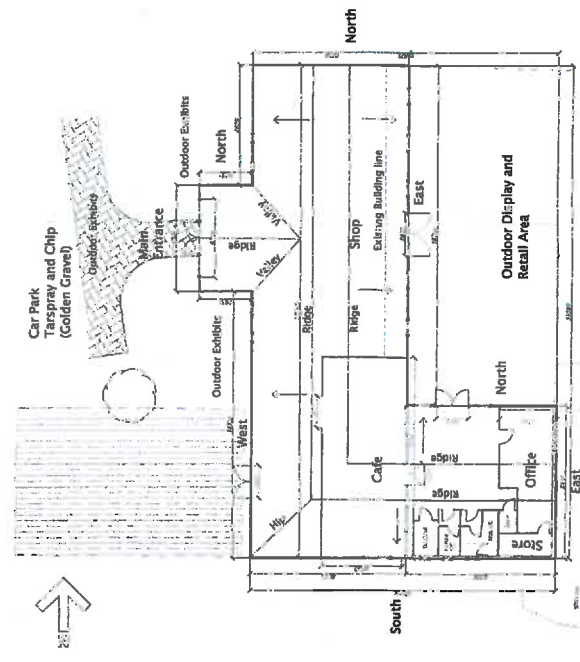
NOTES: THIS DRAWING IS THE PROPERTY OF
BRATHERTON PARK DESIGN LTD.



Side (South) Elevation Scale 1:50



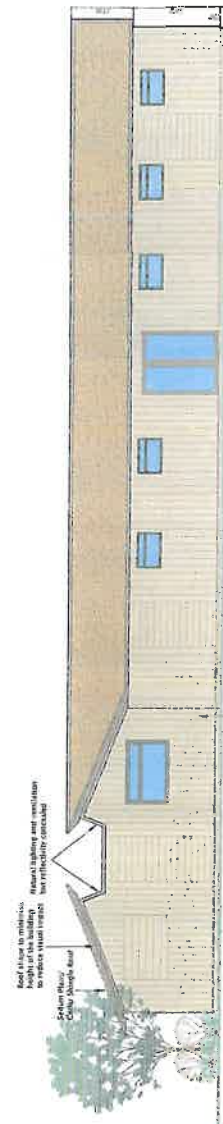
Side (North) Elevation Scale 1:50



Plan Scale 1:100



Front (West) Elevation Scale 1:50



Rear (East) Elevation Scale 1:50

Bratherton Park Design Ltd
 PARK DESIGN CONSULTANTS
 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000

11 11 11
 11 11 11 11
 11 11 11 11



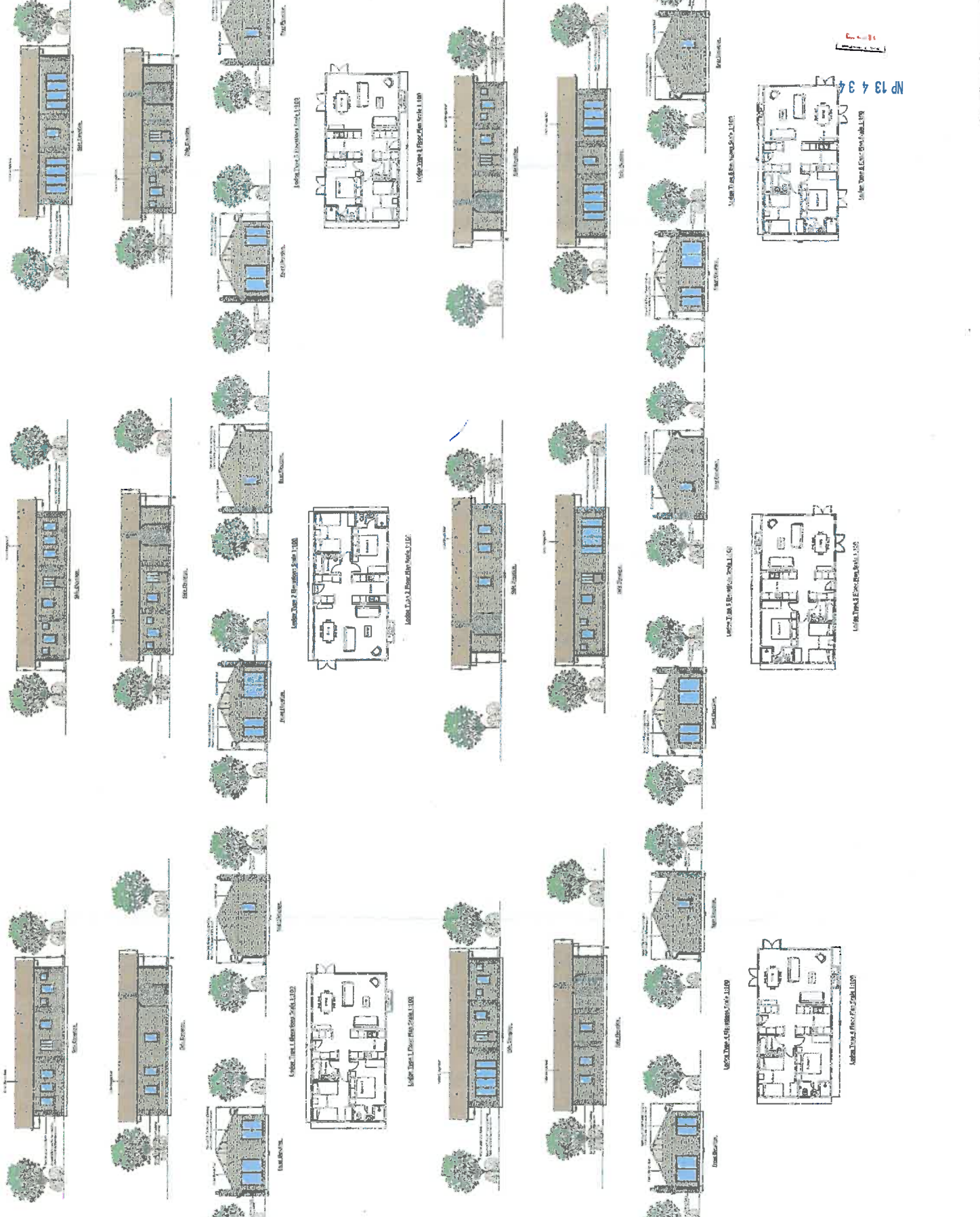
SCALE: 1:50



SCALE: 1:100

Item 6c
 STASIS/LES
 HAVING/URES
 PEMBROKE/CH/FE
 GARDEN CENTRE
 AS PROPOSED PLAN AND
 ELEVATIONS
 DATE: 11/04/09 SCALE: AS SHOWN
 DRAWN BY: [Name] CHECKED BY: [Name]

NOTES: THIS DRAWING IS THE PROPERTY OF
BRATHERTON PARK DESIGN LTD.



Bratherton
 PARK DESIGN CONSULTANTS
 10000 100th Ave. • PO Box 10000
 T. 514 443 0811, 514 443 8827
 E. bratherton@brathertonparkdesign.com

Item 6c)
 ST. JAMES'S
 PARK DESIGN
 ARCHITECTURE

PROPOSED LODGE ELEVATIONS
 AND FLOOR PLANS

DATE: 04/11/23	SCALE: 1/8" = 1'-0"
DESIGNED BY: [Name]	CHECKED BY: [Name]

Architectural drawings showing elevations and floor plans for a lodge building. The elevations are arranged in two rows, with the top row showing the front facade and the bottom row showing the side facade. Each elevation is accompanied by a corresponding floor plan. The drawings include architectural details such as windows, doors, and landscaping elements like trees and shrubs. The floor plans show the internal layout of the building, including rooms and corridors.

10000 100th Ave. • PO Box 10000
 T. 514 443 0811, 514 443 8827
 E. bratherton@brathertonparkdesign.com

Item 6c)
 ST. JAMES'S
 PARK DESIGN
 ARCHITECTURE

PROPOSED LODGE ELEVATIONS
 AND FLOOR PLANS

DATE: 04/11/23	SCALE: 1/8" = 1'-0"
DESIGNED BY: [Name]	CHECKED BY: [Name]