

## Nettleship, Tom

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**From:** Simon Barry [REDACTED] >  
**Sent:** 16 December 2024 18:07  
**To:** LDP - For Enquiries  
**Cc:** Bethan Haigh  
**Subject:** Pembrokeshire County Council Local Development - Boyer on behalf of Celtic Homes Ltd  
**Attachments:** 241216 PCC Deposit 2 Representations Celtic Homes Ltd Final.pdf; 241216 PCC Deposit Plan 2 Comments Form - Celtic Homes Ltd.pdf; E24129201 - Land at Sycamore Woods, Pembroke Dock - Ecology Note (Final).pdf  
**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged  
**Categories:** D Rep

**EXTERNAL EMAIL – Exercise care with links and attachments E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.**

Dear Development Plans Team,

These representations are submitted by Boyer on behalf of our client, Celtic Homes Ltd., in response to Pembrokeshire County Council (PCC)'s Local Development Plan Deposit 2 Consultation. Specifically, these representations relate to Land at Upper Sycamore Woods Pembroke Dock (identified as Candidate Site 074).

Attached is the duly made representations including:

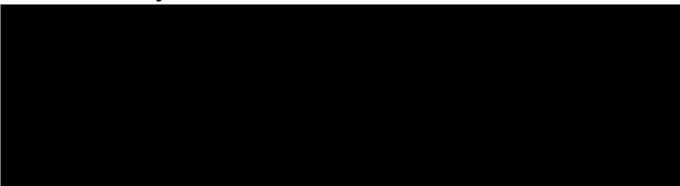
- Covering Letter
- Completed Rep Forms
- Land at Upper Sycamore Woods Ecology Note

Should you wish to discuss the attached then please do not hesitate either my colleague Bethan Haigh [BethanHaigh@boyerplanning.co.uk](mailto:BethanHaigh@boyerplanning.co.uk) or I.

If you could please confirm receipt.

Kind regards

Simon  
**Simon Barry**



**Boyer**  
In aid of  
**Trussell**  
Ending hunger together  
Boyer is proud to support Trussell



Wishing you a Merry Christmas  
and a prosperous new year!

**Boyer**

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At Boyer we take your data privacy seriously view our [privacy notice](#).



*Hoffem gael eich barn am y Cynllun Datblygu Lleol ac ar ddogfennau sy'n cefnogi'r Cynllun Datblygu Lleol. Dylid defnyddio'r ffurflen hon ar gyfer  pob sylw (h.y. sylwadau neu wrthwynebiadau) Mae fersiynau nodiadau cyfarwyddyd ar gael o <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/adneuo>.*

*Sylwch: **Ni fydd** sylwadau a wneud ar Gynllun Adneuo 2020 yn cael eu symud ymlaen ac mae angen gwneud sylwadau newydd ar y Cynllun Adneuo presennol hwn.*

*Os ydych yn cyflwyno copi papur, atodwch dudalennauychwanegol lle bod angen. Mae gan y ffurflen hon ddwy ran: Rhan A (Manylion personol) a Rhan B (eich sylw). Sylwer y bydd Rhan B ar gael i'r cyhoedd a chaiff ei hanfon at Yr Arolygiaeth Gynllunio.*

*Mae'n rhaid derbyn eich sylwadau erbyn hanner nos Rhagfyr 16eg 2024. Dychwelwch ffurflenni at: [ldp@pembrokeshire.gov.uk](mailto:ldp@pembrokeshire.gov.uk) neu Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP*

We would like your views on the Local Development Plan (LDP) and also on documents which support the LDP. This form should be used for all representations (i.e. comments or objections). Electronic versions and guidance notes are available at <https://www.pembrokeshire.gov.uk/local-development-plan-review/deposit>

*Please note: Representations made on the 2020 Deposit Plan will **not** be taken forward and it is necessary to make new representations on this current Deposit Plan.*

If you are submitting a paper copy, attach additional sheets as necessary. This form has two parts: Part A (Personal details) and Part B (Your representation). Please note that Part B will be made publicly available and will be forwarded to the Planning Inspectorate.

**Your representations must be received by midnight 16 December 2024.** Please return forms to: [ldp@pembrokeshire.gov.uk](mailto:ldp@pembrokeshire.gov.uk) or The Development Plans Team, County Hall, Freeman's Way, Haverfordwest, Pembrokeshire SA61 1TP

**RHAN A: Manylion cysylltu**

**PART A: Contact details**

<b>Eich manylion/manylion eich cleient Your / your client's details</b>		<b>Manylion yr asiant (os ydynt yn berthnasol) Agent's details (if relevant)</b>
<i>Enw Name</i>		Bethan Haigh
<i>Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)</i>		Associate Director
<i>Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)</i>	Celtic Homes Ltd	Boyer
<i>Cyfeiriad Address</i>	C/O Agent	
<i>Rhif ffôn Telephone no</i>		
<i>E-bost Email address</i>		
<i>Llofnodwyd (gallwch teipio) Signed (can be typed)</i>	Bethan Haigh	



Dyddiad Date	12.12.2024
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**RHAN B: Eich sylw**  
**PART B: Your representation**

Eich enw / sefydliad Your name / organisation	Boyer on behalf of Celtic Homes Ltd.
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**1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?**  
**1. Which part(s) of the Plan (or supporting documents) are you commenting on?**

Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	LDP Plan Period SP2 – Housing Requirement SP6 – Settlement Hierarchy SP12 – Maintaining and Enhancing the Natural Environment GN16 – Residential Allocations GN17 – Residential Commitments Proposals Map
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Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)	As above
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Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)	OSP/096/LDP2/10
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Os yw eich sylw yn perthyn i ddogfen ategol (e.e. y Gwerthusiad o Gynaliadwyedd), rhowch yr enw(au) a'r cyfeiriad(au) i mewn yma. If your representation relates to a supporting document (e.g. the Sustainability Appraisal), insert the name(s) and reference(s) here.	Candidate Site Register and Assessment
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**2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch fod y Cynllun yn gadarn ai peidio, ac a yw'n bodloni'r gofynion gweithdrefnol.**  
*I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.*  
**2. Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound and meets the procedural requirements.**  
*For more information on soundness and procedural requirements, see the guidance notes.*

Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.	
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<p><i>Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid.</i> I think the LDP is unsound and should be changed.</p>		X
<p><i>Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.</i> I think that the procedural requirements have not been met.</p>		
<p><b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff <u>newydd</u>?</b> <i>Ticiwch <u>bob un</u> sy'n berthnasol.</i></p> <p><b>3. Would you like the LDP to include a <u>new</u> policy, site allocation or paragraph?</b> Tick <u>all</u> that apply.</p>		
<p><i>Dyraniad safle newydd</i> New site allocation</p>		X
<p><i>Polisi newydd</i> New policy</p>		
<p><i>Paragraff neu destun ategol newydd</i> New paragraph or supporting text</p>		
<p><b>4. Os ydych am ychwanegu dyraniad safle newydd, a wnaethoch gyflwyno'r safle yn flaenorol fel y safle cais? Os felly, a fydddech cystal â rhoi enw a chyfeiriad y safle cais (os yw'n hysbys).</b></p> <p><b>4. If you want to add a new site allocation, have you previously submitted the site as a Candidate Site? If so, please give the Candidate Site name and reference (if known).</b></p>		
<p><i>Enw'r safle</i> Site name</p>	Upper Sycamore Woods	
<p><i>Cyfeiriad y cais</i> Site reference</p>	Candidate Site 074	
<p><i>Os ydych am awgrymu safle newydd, dylech atodi cynllun o'r safle yn nodi ffiniau'r safle rydych am eu cynnwys yn y Cynllun a rhoi manylion am ei ddefnydd arfaethedig. Dylech ystyried a oes angen i'r ffurflen sylwadau hon gael ei hategu gan arfarniad o gynaliadwyedd. Lle bo gan newidiadau arfaethedig i Gynllun Datblygu effeithiau cynaliadwyedd sylweddol, bydd angen i chi ddarparu'r wybodaeth berthnasol ar gyfer arfarnu cynaliadwyedd. Mae'n rhaid i'r wybodaeth hon fod yn gyson â chwmpas a lefel manylder yr arfarniad o gynaliadwyedd a gynhaliwyd gan yr Awdurdod. Dylai hefyd gyfeirio at yr un wybodaeth waelodlin wrth amlygu effeithiau sylweddol tebygol y polisi arfaethedig neu safle newydd.</i></p> <p>If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and provide details of its proposed use. You should consider whether it is necessary for this comments form to be accompanied by a sustainability appraisal. Where proposed changes to a development plan have significant sustainability effects, you will need to provide the relevant sustainability appraisal information. This information must be consistent with the</p>		



scope and level of detail of the sustainability appraisal conducted by the Authority. It should also refer to the same baseline information in identifying the likely significant effects of the revised policy or new site.

**5. Rhestrwch eich sylwadau isod.**

*Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sydd eu hangen i gefnogi/cyfiawnhau eich sylw. Nodwch pa brawf/proffion cadernid mae'r Cynllun Datblygu Lleol yn eu bodloni neu nad yw'n eu bodloni a pham (gweler y nodiadau cyfarwyddyd i gael rhagor o wybodaeth). Bydd hyn yn helpu'r Awdurdod a'r Arolygydd i ddeall y materion y byddwch yn eu codi. Dim ond os bydd yr Arolygydd yn eich gwahodd i fynd i'r afael â materion y bydd yn eu codi y byddwch yn gallu cyflwyno rhagor o wybodaeth i'r archwiliad. Sylwer na fydd yr Arolygydd wedi gallu gweld unrhyw sylwadau y gallech fod wedi'u gwneud mewn ymateb i ymgynghoriadau blaenorol.*

**5. Please set out your comments below.**

Include all the information, evidence and supporting information necessary to support / justify your representation. Please indicate which soundness test(s) the LDP meets or does not meet, and why (see guidance notes for more information). This will help the Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

See accompanying Statement and Ecology Technical Note.

*Ticiwch yma os ydych chi'n cyflwyno deunydd ychwanegol i gefnogi eich sylw.*

X

Tick here if you are submitting additional material to support your representation.

**6. Os ydych yn gwrthwynebu'r Cynllun Datblygu Lleol, ydych am siarad mewn sesiwn gwrandawriad yr Archwiliad cyhoeddus?**

*Ar y cam hwn, gallwch wneud sylwadau'n ysgrifenedig yn unig (gelwir y rhain yn 'sylwadau ysgrifenedig'). Fodd bynnag, gall pawb sydd am newid y Cynllun ymddangos gerbron yr Arolygydd a siarad mewn 'sesiwn gwrandawriad' yn ystod yr Archwiliad cyhoeddus. Ond dylech gofio y bydd yr Arolygydd yn rhoi'r un pwys ar eich sylwadau ysgrifenedig ar y ffurflen hon â'r rheiny a wneir ar lafar mewn sesiwn gwrandawriad. Sylwer hefyd y bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol ar gyfer darparu ar gyfer y rhain sydd eisiau rhoi tystiolaeth lafar.*

**6. If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?**

At this stage, you can only make comments in writing (these are called 'written representations'). However, everyone that wants to change the Plan can appear before and speak to the Inspector at a 'hearing session' during the public examination. But you should bear in mind that your written comments on this form will be given the same weight by the Inspector as those made verbally at a hearing session. Please also note that the Inspector will determine the most appropriate procedure for accommodating those who want to provide oral evidence.

*Nid wyf am siarad mewn sesiwn gwrandawriad ac rwyf yn fodlon i'm sylwadau ysgrifenedig gael eu hystyried gan yr Arolygydd.*



<p>I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.</p>	
<p><i>Rwyf am siarad mewn sesiwn gwrandawriad.</i>          I want to speak at a public hearing.</p>	X
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i>          If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').</p>	
<ul style="list-style-type: none"> <li>• Housing Requirement</li> <li>• Proposals Map</li> <li>• Allocations</li> <li>• Candidate Site Assessment (Evidence Base)</li> </ul>	
<p><b>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b>  <b>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i>          I wish to be heard in Welsh.</p>	
<p><i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i>          I wish to be heard in English.</p>	X



## Nodiadau cyfarwyddyd

### Guidance notes

*Caiff Cynllun Datblygu Lleol Cyngor Sir Penfro ei archwilio gan Arolygydd annibynnol a benodir gan Lywodraeth Cymru. Gwaith yr Arolygydd yw ystyried a yw'r Cynllun yn bodloni **gofynion gweithdrefnol** ac a yw'n **gadarn**.*

*'Gellir ystyried 'Cadarn' yn y cyd-destun hwn o fewn ei ystyr arferol o 'dangos barnu da' a 'gellir ymddiried ynddo'. Y cwestiynau neu'r 'profion' y bydd yr Arolygydd yn eu hystyried wrth benderfynu a yw'r Cynllun yn gadarn yw:*

- 1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)*
- 3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)*

*Darperir rhagor o wybodaeth am y profion cadernid a gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.*

*Os ydych yn gwrthwynebu, dylech ddweud pam rydych yn credu bod y Cynllun yn ansad a sut y dylid newid y Cynllun er mwyn ei wneud yn gadarn.*

*Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/brofion cadernid y credwch y mae'r Cynllun yn eu methu. Os yw eich sylw yn perthyn i'r ffordd gafodd y Cynllun ei baratoi neu'r ffordd yr ymgynghorwyd arno, mae'n debygol y bydd eich sylwadau yn perthyn i 'ofynion gweithdrefnol'.*

*Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwyntiedig. Dylech gynnwys eich holl sylwadau ar y ffurflen, gan ddefnyddio dogfennau*

The Pembrokeshire County Council Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Government. It is the Inspector's job to consider whether the Plan meets procedural requirements and whether it is sound.

'Sound' may be considered in this context within its ordinary meaning of 'showing good judgement' and 'able to be trusted'. The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are:

1. Does the plan fit? (i.e. is it consistent with other plans?)
2. Is the plan appropriate? (i.e. is it appropriate for the area in the light of the evidence?)
3. Will the plan deliver? (i.e. is it likely to be effective?)

More information on the soundness tests and procedural requirements is provided in the Planning Inspectorate's LDP Examinations Procedural Guidance.

If you are making an objection, you should say why you think the Plan is unsound and how the Plan should be changed to make it sound.

Where you propose a change to the Plan it would be helpful to make clear which test(s) of soundness you believe the Plan fails. If your comment relates to the way in which the Plan has been prepared or consulted on, it is likely that your comments will relate to 'procedural requirements'.

Failing to identify a test will not mean that your comments will not be considered, providing it relates to the Plan or its supporting documents. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.



*ychwanegol a thystiolaeth ategol lle bod angen.*

*Os ydych yn ceisio am fwy nag un newid i'r Cynllun, nid yw bob tro yn angenrheidiol i lenwi ffurflenni ar wahân ar gyfer pob darn o'ch sylw. Fodd bynnag, gallai fod yn ddefnyddiol o bosibl i ddefnyddio dwy ffurflen ar wahân os ydych yn dymuno siarad mewn gwrandawriad am rai gwrthwynebiadau ond nid rhai eraill.*

*Pan fydd grŵp yn rhannu barn gyffredin ar sut mae'n dymuno i'r Cynllun gael ei newid, byddai'n ddefnyddiol i'r grŵp hwnnw anfon ffurflen unigol gyda'u sylwadau, yn hytrach na bod nifer fawr o unigolion yn anfon ffurflenni ar wahân yn ailadrodd yr un pwynt. Mewn achosion o'r fath, dylai'r grŵp nodi faint o bobl mae'n eu cynrychioli a sut gafodd y sylw ei awdurdodi. Dylid nodi cynrychiolydd y grŵp (neu'r prif ddeisebydd) yn glir.*

If you seek more than one change to the Plan, it is not always necessary to complete separate forms for each part of your representation. It may, however, be helpful to use two separate forms if you wish to speak at a hearing about some objections but not others.

Where a group shares a common view on how it wishes the Plan to be changed, it would be helpful for that group to send a single form with their comments, rather than for a large number of individuals to send in separate forms repeating the same point. In such cases the group should indicate how many people it is representing and how the representation has been authorised. The group's representative (or chief petitioner) should be clearly identified.

16.12.2024  
24.8058 - Upper Sycamore Woods/LDP Deposit 2

LDP Planning Policy,  
Pembrokeshire County Council,  
County Hall,  
Haverfordwest,  
Pembrokeshire,  
SA61 1TP

Third Floor, Park House  
Greyfriars Road  
Cardiff  
CF10 3AF

T 029 2073 6747  
F 029 2073 6631

Dear Sir/Madam,

## Re: Pembrokeshire County Council (PCC)'s Local Development Plan Deposit 2

### Introduction

These representations are submitted by Boyer on behalf of our client, Celtic Homes Ltd., in response to Pembrokeshire County Council (PCC)'s Local Development Plan Deposit 2 Consultation. Specifically, these representations relate to Land at Upper Sycamore Woods Pembroke Dock (identified as Candidate Site 074), hereafter referred to as "the Site".

### LDP Plan Period

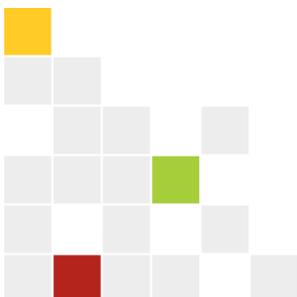
We have significant concerns regarding the LDP Deposit 2 plan period (2017-2033) which, at present, has just over 8 years remaining. This is wholly insufficient and fails to adopt a proactive approach to plan-making. We consider that the current plan period will result in the LDP being ineffective and therefore **failing to meet Test 3** set out within the Development Plan Manual.

We strongly recommend that the plan-period is extended by a minimum of 8 years (until 2041) to ensure it represents a robust and up to date Local Development Plan on adoption that provides a sound basis for future decision-making. Extending the plan period would require the allocation of additional housing sites to ensure the consistent supply of homes throughout the Plan period. It is in this regard that Celtic Homes Ltd support Candidate Site 074 for inclusion as an allocated site.

### SP 2 – Housing Requirement

The Deposit 2 LDP confirms that there is a need to provide a total of 5,840 new homes and 1,970 new jobs (with the potential for a further 1,000 plus jobs arising in the initial phases of the Celtic Freeport proposals) across the Plan period.

SP 2 states that the housing requirement is for approximately 6,425 dwellings, which includes an additional 10% flexibility allowance. We agree with the approach of including a flexibility allowance, which accords with the Development Plan Manual, however, 10% allowance is insufficient.



The Deposit 2 LDP references that 10% flexibility allowance has found to be considered appropriate elsewhere within Wales. We disagree with this statement. Taking account of recently either adopted or those plans in the latter stages of LDP production, including the Swansea LDP and more recently the Bridgend LDP, the examining Inspectors of both LDPs requested an increase in their flexibility allowances beyond 10% (13.3% and 14% respectively).

Given the Council's historic rate of poor housing delivery we consider that a flexibility allowance of 20% would be more appropriate. As such, additional housing allocations are required to ensure the consistent delivery of homes throughout the LDP period.

It should not be overlooked that the County contains an identified Growth Area, and therefore it is imperative that a positive and proactive approach is adopted to accommodate new housing, which will support the delivery of employment.

### **SP6 - Settlement Hierarchy – A Sustainable Settlement Strategy**

We support the LDP Deposit 2 recognition that Pembroke Dock is an Urban Settlement and Main Town with an Urban Character, the highest ranking position within the Council's Settlement Hierarchy, which reflects the identification of Pembroke Dock as lying with a Regional Growth Area as defined within the Future Wales: The National Plan 2040.

This reinforces the need for Pembroke Dock to accommodate the highest levels of housing growth to support its identification as being part of the important Haven Waterway, a major national asset (LDP Deposit 2: Paragraph 4.39).

Pembroke Dock is in a highly sustainable location and we support PCC's recognition of this, acknowledging that it is a key service, employment and retail centre in south Pembrokeshire.

The important role that housing has to play to support economic growth and prosperity should not be overlooked. Growth within Pembroke Dock should be prioritised and additional housing sites should be allocated to ensure the consistent delivery of homes throughout the LDP period to support employment and Pembroke Dock's ability to develop as a centre of excellence for marine engineering and renewable energy related employment activity.

### **SP12 – Maintaining and Enhancing the Natural Environment**

We acknowledge the importance of all development proposals to protect, conserve and enhance the natural environment.

Land at Upper Sycamore Woods positively contributes to the objectives of this policy and will result in a biodiversity net benefit, providing enhanced biodiversity habitats and protecting natural landscape features including trees, woodland and hedgerows.

Through the implementation of a detailed landscape strategy, the proposed residential development at Upper Sycamore Woods will promote increased biodiversity value of Skyemoor Valley (PED13), in accordance with PCC's evidence base (Pembrokeshire's Green Infrastructure Assessment). The Site currently offers no biodiversity benefit to this Green Infrastructure aspiration and makes no contribution to this scheme.

## GN16 – Residential Allocations

Draft Policy GN16 allocates the following sites for residential development:

- HSG/096/00238 - North of Pembroke Road (38 dwellings)
- HSG/096/LDP2/1 - Land at Hampshire Drive (33 dwellings)
- HSG/096/LDP2/2 - West of Stranraer Road (59 dwellings)

All of the above allocations are identified as having a medium-long term delivery timescale. There are no allocations identified within Pembroke Dock that are expected to be delivered in the short term, providing no support to Pembroke Dock's identification as a Regional Growth Area.

We object to this approach and consider that this strategy is not sufficiently aspirational, **failing to meet Test 2** set out within the Test of Soundness of the Development Plans Manual.

Th County has a historic poor rate of housing delivery. Additional, small scale, sites that can be delivered in the short term are needed within Pembroke Dock to ensure that there will be a consistent delivery of housing throughout the LDP period that can support its position in the settlement hierarchy.

Land at Upper Sycamore Woods is being promoted by a developer, who has the expertise and experience required to deliver a sustainable development, underpinned by biodiversity enhancements, that can deliver housing in the short term (Years 1-5).

Land at Upper Sycamore Woods should be included within GN16 as an additional short term delivery site, which would, in accordance with the Development Plans Manual, meet assessed needs and contribute to the achievement of sustainable development.

## GN17 – Residential Commitments

Draft Policy GN17, identifies the following residential commitments within Pembroke Dock:

- 096/00373 - Imble Lane (100 dwellings)
- 096/00274 - Land N of Cleddau Bridge Hotel (5 dwellings)
- 096/00375 - Land N of Cleddau Bridge Hotel (14 dwellings)
- 096/00230 - Hampshire Drive (6 dwellings)

It is noted that, of the above existing residential commitments, 096/00373, 096/00274 and 096/00375 are due to be completed within the medium to long term (Years 6 – 10).

In total 4 dwellings (to be delivered on the remainder of site 096/00230) are proposed to be delivered within Pembroke Dock in Years 1-5. This is not considered to reflect a suitable quantum of growth to support the settlement's position in the hierarchy and ability to remain as a Regional Growth Area, as required by Future Wales.

Notwithstanding this, the Development Plans Manual states that "*housing trajectories should include a steady flow of housing sites through the plan period, and not be unduly loaded towards the end of the plan period*". At present the Deposit 2 LDP fails to meet this requirement.

## Proposals Map

The draft proposals map (shown below) identifies the southern part of the Site as being within an area of amenity open space, which is subject to draft Policy GN 52. We strongly object to this allocation.

Figure 1 – Extract of the Deposit LDP Proposals Map



Firstly, it is evident that the Deposit LDP and this allocation specifically is not supported by an amenity space assessment, which would assess a site's suitability as amenity open space. The site has therefore not been assessed in respect of its contribution to the objectives of amenity open space. We therefore challenge the basis upon which PCC can determine that the site is suitable as an amenity space allocation in the absence of any tangible technical evidence.

In the absence of any amenity space assessment, this allocation is not based on robust, proportionate and credible evidence, therefore **failing to meet the Test 2** of the tests of soundness set out within the Development Plan Manual, rendering the Proposals Map unsound.

Amenity Open Space falls within the definition of Green Infrastructure (subject to draft Policy GN 45). Green Infrastructure assets are considered to be "*assets that are natural or semi-natural green spaces, contributing to the county's biodiversity, nature conservation, distinctiveness and sense of place, and support the well-being of visitors and residents through their enjoyment of places for nature, recreation or sport.*" (LDP Deposit 2; Paragraph 5.257)

As discussed in the proceeding section of these representations, site specific technical evidence confirms that the Site, which is made of bare, cleared ground, does not make any meaningful contribution towards biodiversity, nature conservation or distinctiveness and sense of place. It cannot, therefore, be considered that the Site makes any contribution towards the definition of Green Infrastructure.

It is noted that the land adjacent (identified as Candidate Site 075) is also proposed to be designated as open amenity space. This is not disputed and it is acknowledged that, unlike Upper Sycamore Woods, the adjacent site includes thick vegetation and woodland, which is likely to contribute to biodiversity. It cannot be considered that Candidate Site 075 has the same landscape and ecological characteristics as Candidate Site 074.

To ensure the draft Proposals Map meets the required tests of soundness, the area identified as Candidate Site 074 must be removed from the amenity open space allocation. To confirm, this omission has no bearing on the contribution and principles that the adjoining site makes towards green infrastructure, biodiversity and open amenity space.

### **LDP Deposit 2 Evidence Base: Candidate Site Register and Site Assessment – Site 074**

Candidate Site 074 is divided into a northern and southern area, both are assessed within the Council's Candidate Site Register and Site Assessment. The northern part of Candidate Site 074 is assessed as having a "Green" rating and the southern part of Candidate Site 074 has been assessed with a "Red 4" rating.

The northern Candidate Site 074 area is subject to an extant planning permission app. ref.: 19/1267/PA and is under construction. We support PCC's assessment of the northern part of Candidate Site 074.

*Figure 2 – Extract from the PCC LDP Deposit 2 (Candidate Site 074)*



We wholly object to the Council's assessment of the southern part of Candidate Site 074, which considers that development is unsuitable due to ecological and landscape constraints. The Candidate Site Register and Site Assessment does not offer any further information with regards to the Council's assessment of the site. It is evident, however, from the PCC Candidate Site Methodology, that this site assessment has been conducted as a desktop exercise and in the absence of a site visit, which would clearly demonstrate that the site is made of bare ground and provides little to no biodiversity benefit.

It is also important to highlight that in November 2020 the Authority granted planning permission 20/0085/PA in the southern section of Candidate Site 074, for The extant consent allows for the erection of a stable building and a manege. The stable has consent for a footprint of approximately 73m<sup>2</sup> with a height of 3.4 m to the ridge. The development also allows for three stables, a tack room and open store, with the manege located to the north of the stable and having a length of 25m and a width of 20m. Interestingly from a review of the Delegated Officers Report there is no objections from any statutory consultee, in particular ecology nor landscape which sought to cause any concern for

the development of the site. Clearly the principle of development is established and suggestion that the site fits within the proposed amenity open space subject to draft Policy GN 52 is completely diminished. The site could be lawfully developed for the stable and menege and would not constitute any open amenity space at all. The Site is in private ownership with a detailed consent, whereas the Authority have no evidence base to support the proposed allocation. Clearly this is not based on robust, proportionate and credible evidence, therefore failing to meet the Test 2 of the tests of soundness set out within the Development Plan Manual, rendering the Proposals Map unsound.

### Landscape

In landscape terms, the Site is contained by vegetation, framing it from the wider area and therefore makes no contribution to the wider countryside setting and there are no landscape reasons that would impede the Site from being developed.

The Site is naturally well contained by physical defensible features seen as it abuts the defined urban area of Pembroke Dock to the north, is framed on its eastern and northern boundaries by highways infrastructure associated with Sycamore Woods and Lavinia Drive and benefits from an established section of trees/associated vegetation along its western and southern boundaries, which frame the Site from the wider countryside. This existing vegetation shall be retained and creates a defensible boundary to the south, protecting the objectives of the draft Green Wedge allocation to the south. On that basis, the proposed development and identification of this Site as an allocation, would not result in any coalescence of existing settlements.

Indeed, further discussions with PCC have confirmed that the Landscape Officer had initially assessed and offered the following conclusion for the southern part of Candidate Site 074 - "Support, subject to quality controls". We agree with this assessment. It is therefore wholly unjustified for the Landscape Officer to subsequently change their assessment and conclusions with no reasoning to the following: "Object, due to Design Issues". We query the soundness of this judgement in the absence of any site visit or technical investigation.

Notwithstanding this, matters relating to design can be appropriately addressed at the detailed design stage. Candidate site assessments should be made based on site suitability and the principle of development. We fully object to this new landscape assessment, which is unfounded.

We have conducted further site specific technical evidence, summarised below, which confirms that there is no ecological or landscape reason that should prevent the site from being developed.

### Ecology

On further engagement with PCC, it is understood that the Council's Ecologist expressed concerns regarding the site's contribution towards ecology, concluding with the following assessment "*object – green corridor for protected species*". We strongly object to this assessment, which we consider is not supported by robust technical evidence.

It should be noted that no ecology concerns were raised in respect of the extant permission to the north of the site (app. ref.: 19/1267/PA) or the extant permission to the south (app. ref.: 20/0085/PA).

An ecology survey has been conducted by appointed well respected and professional consultants Soltys Brewster Ecology. A walkover survey was undertaken on 9<sup>th</sup> December 2024 by a suitably qualified ecologist with a number of years' experience.

The survey concluded that the Site has been cleared and is covered in bare earth and gravel. Indeed, the site has been subject to regular disturbance since 2006 and this is depicted on satellite imagery. It cannot be considered, therefore, that the site plays any meaningful role in providing an important green corridor for a protected species (as indicated by the County Ecologist).

The walkover survey confirmed that there are no over-riding ecological constraints that are likely to impact the future development of the site. As set out within the attached report, the central regions of the site were considered to hold **negligible ecological value**. Existing vegetation along the site's peripheries will be retained and enhanced as part of a future scheme, providing additional habitat resources for local biodiversity and contributing to a Net Biodiversity Benefit (NBB) as required by Planning Policy Wales (PPW) 12.

No further surveys were recommended and the assessment confirms that there is no technical ecological constraint that would prevent the Site from being developed. The County Ecologist's conclusion that the Site is a green corridor for protected species is entirely disproven.

The Candidate Site Register and Site Assessment therefore does not represent robust, proportionate and credible evidence and therefore **fails Test 2** of the Tests of Soundness set out within the Development Plans Manual.

## Summary

As presently drafted, we consider there to be a number of fundamental flaws in the Deposit 2 LDP, rendering it unsound, these include:

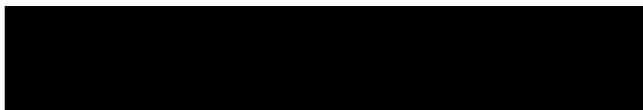
- Plan Period (**failing to meet Test 3**);
- Housing Requirement (inadequate flexibility allowance, **failing to meet Test 2**);
- Residential Allocations (do not reflect Pembroke Dock's position in the hierarchy, **failing to meet Test 2**);
- Proposals Map (allocation of amenity land, **failing to meet Test 2**); and
- Evidence Base – Candidate Site Assessment 074 (**failing to meet Test 2**).

We raise significant concerns regarding the lack of short term housing allocations identified within Pembroke Dock during the LDP period, which will undoubtedly stagnate the market and the settlement's ability to support the level of economic growth identified and required by Future Wales 2040. Additional, short term, sites (including Land at Upper Sycamore Woods) are required to ensure the consistent delivery of homes throughout the LDP period.

Land at Upper Sycamore Woods offers the opportunity to deliver an attractive, high quality scheme that will contribute to Pembroke Dock's housing supply in the short term (Years 1-5). The proposed development would fully accord with all relevant LDP policies, including GN 43, 44 and 49 and as has been demonstrated within these representations, there are no ecological or landscape reasons preventing the site from being developed.

Yours sincerely

**Bethan Haigh MRICS MRTPI**  
**Associate Director**



**GEARÓID HUNT CELTIC HOMES LTD**

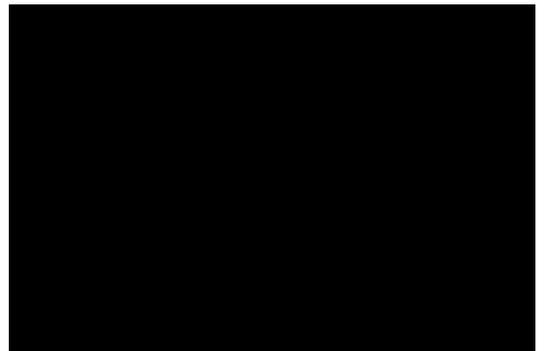
**LAND AT SYCAMORE WOODS, PEMBROKE DOCK**

**ECOLOGY SUMMARY NOTE (2024)**



DECEMBER 2024

**soltysbrewster**  
E C O L O G Y



# GEARÓID HUNT CELTIC HOMES LTD

## LAND AT SYCAMORE WOODS, PEMBROKE DOCK

### ECOLOGY SUMMARY NOTE (2024)

DOCUMENT REF: E24129201 / DOC 01 – 13<sup>th</sup> December 2024

Issue	Revision	Stage	Date	Prepared by	Approved by	Signed
1	-	Draft for review	11 <sup>th</sup> December 2024	Ben Satherley (Senior Ecologist)	Dr. M Watts (Director)	M. WATTS
2	-	Final for submission	13 <sup>th</sup> December 2024	Ben Satherley (Senior Ecologist)		

## **ECOLOGY SUMMARY NOTE**

### **LAND AT SYCAMORE WOODS, PEMBROKE DOCK**

#### **Background**

Soltys Brewster Ecology (SBE) were commissioned by Gearóid Hunt Celtic Homes Ltd to undertake an ecological site walkover survey at a parcel of land found near Sycamore Woods in Pembroke Dock (central grid reference: SM 96581 02553). The site, approximately 0.4ha in size, was proposed as a candidate site for residential development as part of Pembrokeshire County Council's Local Development Plan Review (RLDP2). The application was rejected with the site instead designated as 'Amenity Open Green Space'. It is understood that the client wishes to object against the Amenity Open Green Space designation and so a survey to establish the baseline conditions and identify any ecological constraints or opportunities at the site is therefore required to inform the objection.

#### **Desk Study**

In order to provide some ecological context, a desk-based consultation was undertaken in addition to the ecological walkover survey. This desk study primarily involved consultation with the West Wales Biodiversity Information Centre (WWBIC), the National Biodiversity Network Trust (NBN) Atlas<sup>1</sup> and the DEFRA 'MAGIC' interactive mapping tool<sup>2</sup> to identify any records of rare, protected or notable flora and fauna at the site and within a radius of 1km (extended to 2km for bats as per the Bat Conservation Trust's good practice guidelines) extending from the central point of the site. The search criteria also included information relating to the location and citation details (where available) for any sites designated for their nature conservation interest such as Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs) or Sites of Importance for Nature Conservation (SINCs). A copy of the desk study information received from WWBIC is included within Appendix II.

Consultation with WWBIC and the MAGIC Map identified a total of 4no. statutory designated sites within a 5km radius of the candidate site ( see Table 1 below). While none of these designations would be directly affected by any future development at the candidate site, any future scheme will need to consider the potential, albeit limited, for indirect impacts (e.g. impacts on water quality through run-off water).

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<sup>1</sup> NBN Atlas: <https://nbnatlas.org/>

<sup>2</sup> Magic Map Application: <https://magic.defra.gov.uk/magicmap.aspx>

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**Land at Sycamore Woods, Pembroke Dock**

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**Table 1 – Statutory designated sites found within a 5km radius of the candidate site**

Site name	Citation/Description	Distance from Candidate Site
Milford Haven Waterway SSSI	Milford Haven Waterway SSSI extends from the mouth of the Haven at Dale Point and Thorn Island to the upper reaches of the Daugleddau at Haverfordwest in the west and Blackpool Mill in the east. The site is of special interest for its geology, ancient woodland, marine biology, saltmarsh, swamp, saline lagoons, rare and scarce plants and invertebrates, nationally important numbers of migratory waterfowl, Greater and Lesser Horseshoe bats <i>Rhinolophus ferrumequinum</i> and <i>R. hipposideros</i> , and Otter <i>Lutra lutra</i> .	The Pembroke River section of the SSSI lies approx. 240m to the south
Pembrokeshire Marine SAC	<p>Pembrokeshire Marine SAC extends from just north of Abereiddy on the north Pembrokeshire coast to just east of Manorbier in the south, and includes the coast of the islands of Ramsey, Skomer, Grassholm, Skokholm, the Bishops and Clerks and The Smalls. The site encompasses areas of sea, coast and estuary that support a wide range of different marine habitats and wildlife, some of which are unique in Wales. For the qualifying habitats and species, the Pembrokeshire Marine SAC is considered to be one of the best areas in the UK for:</p> <ul style="list-style-type: none"> <li>• Large shallow inlets and bays</li> <li>• Estuaries</li> <li>• Reefs</li> <li>• Grey seal <i>Halichoerus grypus</i></li> </ul> <p>The SAC also supports a significant presence of:</p> <ul style="list-style-type: none"> <li>• Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>)</li> <li>• Mud-flats and sand-flats not covered by seawater at low tide</li> <li>• Coastal lagoons</li> <li>• Submerged or partially submerged sea caves</li> <li>• Sandbanks which are slightly covered by seawater all the time</li> <li>• Allis shad <i>Alosa alosa</i></li> <li>• Twaite shad <i>Alosa fallax</i></li> <li>• River lamprey <i>Lampetra fluviatilis</i></li> <li>• Sea lamprey <i>Petromyzon marinus</i></li> <li>• Otter</li> <li>• Shore dock <i>Rumex rupestris</i></li> </ul>	Approx 240m to the south.

Site name	Citation/Description	Distance from Candidate Site
Gweunydd Somerton Meadows SSSI	Gweunydd Somerton Meadows is situated on the north side of the Castlemartin Peninsula and is of special interest for its grassland fungi assemblage and unimproved neutral grassland. It is regarded as one of the best grassland fungi sites in Wales.	Approx. 3.7km to southwest.
Scoveston Fort SSSI	Scoveston Fort is situated approximately 2km north-west of the town of Neyland and is of special interest for its population of hibernating Greater Horseshoe bats. This site has been monitored since 1975 and is one of the largest known hibernation sites for this species in Wales.	Approx 4.4km to the northwest.

While there are no known non-statutory designated sites (e.g. SINC)s found within a 1km radius of the candidate site, several Restored Ancient Woodland sites were identified within this search radius (see Appendix II) – none of which lie within or directly adjacent to the candidate site. The site also lies within the ‘B-Lines’ network. This is an initiative run by Buglife which involves the identification and restoration of ‘insect pathways’ throughout British cities, towns and countryside by creating a series of wildflower-rich habitat steppingstones. The B-Lines initiative is not afforded any legal protection but is considered of relevance to the site and opportunities for enhancement should be considered as part of any future scheme.

The desk study also returned several records for protected fauna and flora within 1km of the candidate site (extended to 2km for bats), although none of these were associated with the site itself. This included foraging/commuting records for at least 7no. different bat species including Common and Soprano Pipistrelle *Pipistrellus pipistrellus* & *P. pygmaeus*, Lesser and Greater Horseshoe Bats, *Serotine Eptesicus serotinus*, Brown Long-eared Bat *Plecotus auritus* and Noctule *Nyctalus noctula*. The nearest known roost, a small Pipistrelle roost associated with a residential house, can be found approximately 500m from the site boundaries. Other protected/priority listed mammals found within a 1km radius of the site include records for both Hedgehog *Erinaceus europaeus* and Badger *Meles meles*. The nearest record for Hazel Dormouse *Muscardinus avellanarius* (two nests found in 2021) is located approximately 1250m from the site boundaries.

A small list of herpetofauna (reptiles and amphibians) records were found within the 1km search radius. This included records for Slow Worm *Anguis fragilis*, Common Toad *Bufo bufo*, Common Frog *Rana*

*temporaria* and Palmate Newt *Lissotriton helveticus*. Slow Worm have previously been found within the housing estate directly north of the candidate site. There are no known Great Crested Newt *Triturus cristatus* records in the local area and Pembroke is generally considered outside the known geographical range for this species.

The desk study identified a number of protected bird species listed under Schedule 1 of the Wildlife & Countryside Act (1981) (as amended) previously recorded within 1km of the site including Mediterranean Gull *Larus Melanocephalus*, Great Northern Diver *Gavia immer*, Redwing *Turdus iliacus*, Spoonbill *Platalea Leucorodia*, Kingfisher *Alcedo Atthis*, Avocet *Recurvirostra Avosetta*, Fieldfare *Turdus pilaris*, Black Redstart *Phoenicurus Ochruros*, Greenshank *Tringa Nebularia*, Ruff *Philomachus pugnax*, Black-tailed Godwit *Limosa limosa*, Red Kite *Milvus milvus*, Peregrine *Falco peregrinus* and Whimbrel *Numenius Phaeopus*. The data search also included an extensive list of Priority bird species listed under Section 7 of the Environmental Act (Wales) 2016 that have previously been recorded within 1km of the site. While not all of these were considered of relevance to the candidate site (e.g. those species associated with habitats that do not occur at the site such as wetlands, watercourse or coastal habitats), the site is likely to provide nesting opportunities for tree/scrub nesting species such as Song Thrush *Turdus philomelos* and Bullfinch *Pyrrhula pyrrhula*.

The desk study identified a total of 13no. records for S7 priority listed invertebrates within a 1km radius of the site, including those for at least 11no. different species. White Ermine *Spilosoma lubricipeda*, Small Blue *Cupido minimus* and Dingy Skipper *Erynnis tages* have all previously been recorded in close proximity to the site.

Black Swan *Cygnus atratus* and Japanese Knotweed *Fallopia japonica* represent the only invasive species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) that have been recorded in the local area.

### **2024 Walkover Survey**

The walkover survey was undertaken on 9<sup>th</sup> December 2024 by a suitably qualified ecologist<sup>3</sup>. A summary of the site's features and habitats can be found below, with further descriptions along with associated species lists and accompanying photos found in Appendix III. The distribution and extent of each habitat type is illustrated on the Phase 1 Habitat Plan which is also include within Appendix III.

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<sup>3</sup> Associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) with experience in habitat and protected species surveys  
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### Habitats

The survey revealed that the site had recently been cleared and as such much of the site was covered in bare ground in the form of bare earth and gravel. A review of historic satellite imagery revealed that the site has been subject to regular disturbance and has been cleared on several occasions since 2006 (which represents the earliest available satellite image). Any vegetation found in the central regions of the site was limited to patchy and scarce ephemeral/short perennial vegetation, with species recorded considered typical of disturbed land (see Target Note 1 and image on front cover). These areas were considered to hold negligible ecological value.

More extensive areas of vegetation were recorded along the site's peripheries, with species-poor thorny hedgerows found marking the site's eastern and southern boundaries (see Target Notes 2 and 5). These appeared to be regularly managed (e.g. through an annual cutting/flailing regime) and had been maintained to a height of approximately 2m. Native hedgerows such as this are listed as Priority Habitats under Section 7 of the Environmental Act (Wales) 2016.

The site's western boundary is defined by a post and wire fence which is set on a steeply sloping bank which descends into the adjacent valley further to the west (see Target Note 7). The vegetation found across the bank had not been cleared with the rest of the site, and at the time of the survey the bank supported a mosaic of tall ruderal, scattered Bracken *Pteridium aquilinum* and scrub vegetation, with a small number of young/semi-mature Ash *Fraxinus excelsior* also present – these displayed signs of Ash-dieback *Hymenoscyphus pseudoalbidus* disease. It was not possible to individually map each of these habitats on the Phase 1 Habitat plan (i.e. due to their mosaic nature) and as such these were instead mapped together as 'tall ruderal' vegetation.

Outside the site boundaries existing residential development can be found to the north and east, with agricultural field parcels found the south and west. The field found immediately south of the site supported what appeared to be heavily grazed improved grassland, while the field to the west was largely covered in continuous Bracken and contained goats at the time of the survey (see Target Note 8). The western field is also situated on a steep slope which descends to the valley floor further to the west.

No invasive non-native plant species listed under Schedule 9 of the Wildlife and Countryside Act (1981) (as amended) were identified at or immediately adjacent to the site however, Butterfly Bush *Buddleja davidii* was noted growing on the site's western boundary. While this species is not currently listed on

Schedule 9, it is considered to be particularly invasive and can spread rapidly if left unmanaged (see Target Note 7).

### Protected & Priority Listed Species

During the walkover survey a small number of bird species were seen at/flying over the site including House Sparrow *Passer domesticus*, Starling *Sturnus Vulgaris*, Wren *Troglodytes troglodytes*, Chaffinch *Fringilla coelebs*, Magpie *Pica pica*, Wood Pigeon *Columba palumbus*, Jackdaw *Corvus Monedula*, Carrion Crow *Corvus Corone*, Robin *Erithacus Rubecula*, Blackbird *Turdus merula* and Great Spotted Woodpecker *Dendrocopos major* – of which both House Sparrow and Starling are listed as Priority bird species under Section 7 of the Environmental Act (Wales) 2016. While the eastern and southern boundary hedgerows represent suitable nesting habitat for a variety of tree/shrub nesting species, the remaining areas of the site generally offer few nesting opportunities, with the young/semi-mature trees likely to be too small/exposed for use by nesting birds (although these could not be ruled out completely and will improve in terms of suitability as they age). Under the Wildlife and Countryside Act (1981) (as amended), all wild birds are protected against killing or injuring and their nests against damage or destruction whilst in use or being built.

There are no buildings/structures within the site boundaries which roosting bats could utilise, and none of the trees present at or directly adjacent to the site contained any potential roosting features which could support crevice dwelling bat species (Negligible roosting potential). The habitats found at the site likely offer little in terms of foraging resources for bats, with the boundary hedgerows also unlikely to represent important commuting pathways for local bats.

No evidence to suggest the use of the site by any other protected or priority species was found (e.g. foraging/commuting Badger *Meles meles*) however, the vegetated western bank was considered to hold low potential of supporting common reptiles – the desk study revealed that Slow Worm have previously been recorded in close proximity to the site. All UK reptiles are protected against intentional killing and injuring under Schedule 5 of the Wildlife & Countryside Act (1981) (as amended) and are an important ecological consideration in terms of site development. The mosaic of habitats along the bank likely provide ample foraging, shelter and basking opportunities for reptiles, with further suitable habitat found in the adjacent field parcel to the west.

### **Consideration of Development Impacts**

The walkover survey did not identify any over-riding ecological constraints that are likely to impact any future development at the site. The boundary hedgerows were considered to represent the features of greatest ecological value in a local context, with these listed as S7 priority habitats and considered to be capable of supporting nesting birds and potentially individual/small numbers of common reptiles. These hedgerows are expected to be retained as part of any future development at the site, limiting any potential impacts to these species groups. The mosaic of vegetation found along the site's western bank was also considered to hold low potential of supporting common reptiles, although this is also expected to be retained as part of any future layout design. Furthermore, it is understood that the vegetation along the site's western periphery is to be allowed to grow tall and scrubby, providing additional habitat resources for local biodiversity (e.g. for birds and invertebrates/other pollinators) while also contributing towards the local Green Infrastructure (GI) network and the B-Line initiative. Any habitats expected to be lost in the central regions of the site to accommodate development were considered to hold negligible ecological value.

While no further surveys would be recommended, a precautionary approach to any required vegetation clearance should be adopted. Any required pruning or removal of trees/shrubs should be completed outside of the bird breeding season which typically extends from March – August inclusive. Alternatively a visual inspection to confirm the absence of nesting birds should be undertaken by an ecologist immediately prior (within 48 hours) to any such works commencing. If an active nest was identified, it would have to remain in place until any young had fledged, and the nest was no longer in use. A precautionary approach should also be undertaken to any vegetation clearance required along the base of the hedgerows and along the western slope so as to safeguard any potential reptiles which inhabit these areas. Vegetation in these locations should be cleared when reptiles are active (typically April – September) and via a two-stage process where an initial cut to 100-150mm is undertaken with the use of hand tools (strimmers/brushcutters), followed by a second cut to ground level after a minimum period of 48hrs. Arisings should be removed immediately from the construction zone following each cut.

It is also recommended that during the construction phase of any future development any excavations are covered overnight, or a means of escape provided (e.g. rough sawn timber board of 300mm width placed at an angle less than 45 degrees) to minimise the risk to any small mammals (e.g. Hedgehog) that may become trapped.

While no Schedule 9 INNS were identified at the site, it is recommended that any strands of Butterfly Bush present along the western slope are cleared to prevent these from spreading and out-competing/overshadowing native species. Other avoidance, mitigation and enhancements measures considered appropriate for the site are summarised below:

### **Avoidance**

- Retention and protection of the priority listed habitats (native hedgerows) as far as reasonably practicable.
- Any required tree/shrub/scrub clearance to avoid nesting bird season and to be undertaken over the winter period (between September – February).

### **Mitigation**

- Design of site lighting (during both the construction and operational phases of the development) to minimise artificial light spill onto retained boundary features and any habitats found within the valley further to the west in order to limit potential impacts to foraging/commuting bats and other nocturnal wildlife. Any increase in lux level to be less than or equal to 1.0 lux.
- Sensitive approach to clearance of hedgerow bases and vegetated western bank so as to minimise any risks to any common reptiles that may be present.
- Covering of any excavations overnight or means of escape provided during construction phase to minimise risks to Hedgehogs and any other small mammals that may become trapped.
- Layout design to feature Hedgehog corridors<sup>4</sup>, to allow for continued habitat connectivity throughout the final development.
- Construction Environmental Management Plan (CEMP) prepared to set out pollution control measures to avoid/minimise any risk to watercourse to the west (which drains into the SAC);

### **Enhancements**

- Inclusion of bat and bird boxes onto new buildings/retained trees.
- Design of any SuDS features to benefit local biodiversity.
- Strengthening of existing hedgerows with new native tree/shrub planting.
- Creation of reptile hibernacula (e.g. brash/log/stone piles) along the site's western bank. These could utilise arisings from any required vegetation clearance.

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<sup>4</sup> Based on the 'Hedgehog Street' principle advised by the People's Trust for Endangered Species (PTES) and other conservation groups: <https://www.hedgehogstreet.org/>

- Landscape plan to include native tree and shrub species or those with a known benefit to local biodiversity. Any landscaped grassy areas could also be seeded with a species-rich grass mix (e.g. WFG20 Eco Species Rich Lawn from Germinal) to help provide a net gain for biodiversity at the site and to improve foraging resources for pollinators.
- Implement Management Plan for retained and proposed planting to maintain & enhance value to Biodiversity.
- Eradication of Butterfly Bush from the site.

## **References**

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**APPENDIX I SITE LOCATION PLAN**



**SITE LAYOUT** Scale - 1:500

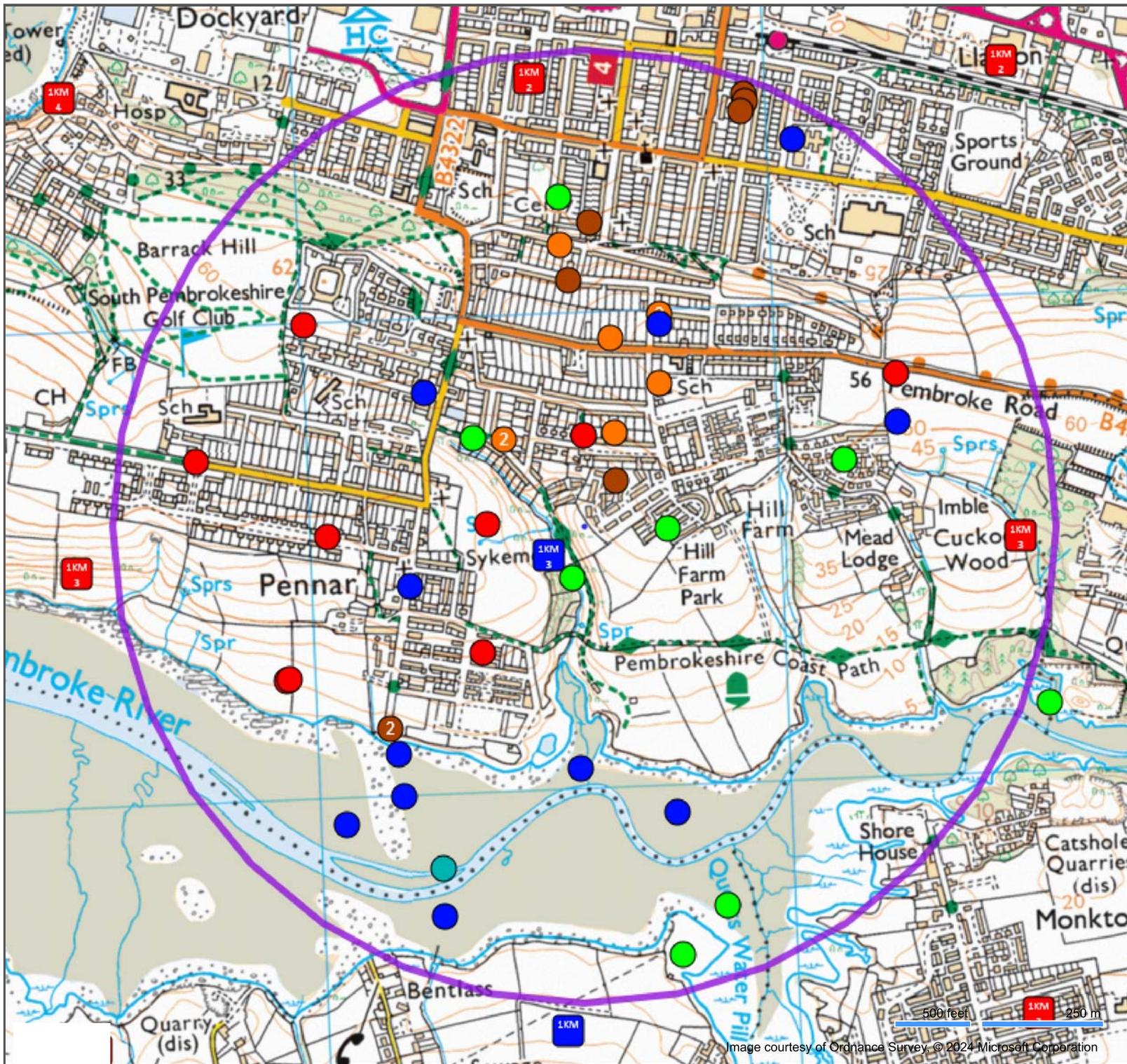


Revision	Description	Date
Drawing <b>SITE LAYOUT</b>		
Clients <b>CELTIC HOMES LTD.</b>		
Project / title LDP2 Objection & suggested revised open space allocation to land adjacent to rear of Sycamore Woods, Pembroke Dock		
Drawing Number <b>A02</b>	Revision	Scale 1:2500
		Date MAR 2020

**Hayston**  
Developments & Planning Ltd

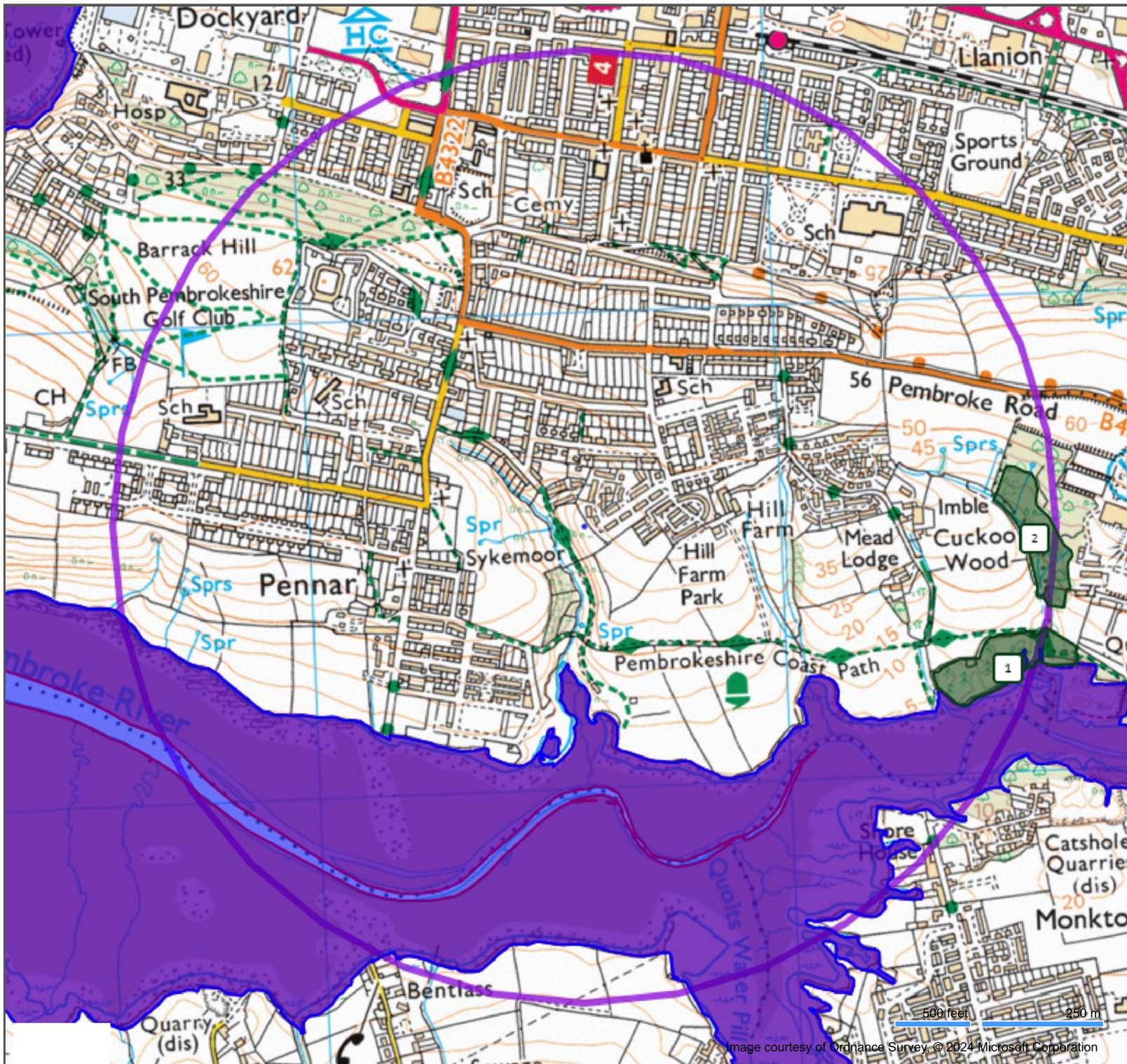
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**APPENDIX II WWBIC DESK STUDY RECORDS**



**Key**

- Search Location
- Search Buffer (1000m)
- Birds
- Butterflies and Moths
- Fish
- Mammals
- Plants
- Reptiles and Amphibian



- Key**
- Search Location
  - Search Buffer (1000m)
  - Ancient Semi-natural Woodland
    - 1: Restored Ancient Woodland Site
    - 2: Restored Ancient Woodland Site
  - Special Areas of Conservation
    - 1: Pembrokeshire Marine / Sir Benfro Forol
  - Sites of Special Scientific Interest
    - 1: Milford Haven Waterway

**APPENDIX III PHASE 1 HABITAT PLAN AND TARGET NOTES**

Target Note	Description/Comment
	<p><i>Birds seen/ heard: House Sparrow, Starling, Wren, Chaffinch, Magpie, Wood Pigeon, Jackdaw, Carrion Crow, Robin, Blackbird &amp; Great Spotted Woodpecker.</i></p>
<p>1</p>	<p>The central regions of the site have been cleared and are currently occupied by bare ground in the form of bare soil and gravel. A review of historic satellite imagery revealed that the site has been subject to regular disturbance and has been cleared several times since 2006 (the earliest available satellite image).</p> <p>The bare ground supports very patchy and sparse ephemeral/short perennial vegetation, with species recorded considered typical of recently disturbed ground such as Ribwort Plantain <i>Plantago lanceolata</i>, Ragwort <i>Jacobaea vulgaris</i>, Smooth Cat’s-ear <i>Hypochaeris glabra</i>, Black Medick <i>Medicago lupulina</i>, Dove’s-foot Crane’s-bill <i>Geranium molle</i>, Creeping Cinquefoil <i>Potentilla reptans</i>, Wild Radish <i>Raphanus raphanistrum</i>, Creeping Buttercup <i>Ranunculus repens</i>, White Clover <i>Trifolium repens</i>, Prostate Knotweed <i>Polygonum aviculare</i>, Selfheal <i>Prunella vulgaris</i>, Cocksfoot Grass <i>Dactylis glomerata</i>, Hoary Mustard <i>Hirschfeldia incana</i>, Broadleaved Dock <i>Rumex obtusifolius</i>, Spear Thistle <i>Cirsium vulgare</i>, Smooth Hawksbeard <i>Crepis capillaris</i>, Common Knapweed <i>Centaurea nigra</i>, Creeping Thistle <i>Cirsium arvense</i>, Colt’s-foot <i>Tussilago farfara</i>, Common Melilot <i>Melilotus officinalis</i>, Common Dandelion <i>Taraxacum officinale</i>, Lesser Swinecress <i>Coronopus didymus</i> and Golden Cup St John’s Wort <i>Hypericum patulum</i>. These areas were considered to hold negligible ecological value.</p> <p>A single shipping container can also be found in the centre of the site – this was considered to hold Negligible roosting potential.</p> 
<p>2</p>	<p>The eastern boundary of the site is defined by a defunct and species-poor thorny hedgerow that consisted mostly of Hawthorn <i>Crataegus monogyna</i> and Blackthorn <i>Prunus spinosa</i> with occasional Gorse <i>Ulex europaeus</i> and young strands of Ash. The hedge’s understory supports species such as Bramble <i>Rubus fruticosus</i>, Cleavers <i>Galium aparine</i>,</p>

	<p>Bracken, Common Foxglove <i>Digitalis purpurea</i>, Wood Sage <i>Teucrium scorodonia</i>, Hogweed <i>Heracleum sphondylium</i>, Hart's-tongue Fern <i>Asplenium scolopendrium</i>, Herb Robert <i>Geranium robertianum</i>, Red Campion <i>Silene dioica</i>, Ivy <i>Hedera helix</i> and American Willowherb <i>Epilobium ciliatum</i>.</p> <p>This hedge is supported by a post and wire fence and abuts directly onto existing residential fences/ornamental hedges found further to the east.</p> 
<p>3</p>	<p>A well-used mammal path was found running under the eastern boundary hedgerow/fence in this location. This was considered to be too small for use by Badger and is instead more likely to be used by other small mammals such as Rabbit – Rabbit droppings were found adjacent to the path and soft fur (indicative of Rabbit) was also found caught in the fence.</p> 
<p>4</p>	<p>Semi-mature Oak <i>Quercus sp.</i> situated adjacent to eastern boundary – no features considered suitable for use by roosting bats – Negligible Potential. Any scheme would look to retain this tree as part of any future layout.</p>

	
5	<p>The southern boundary of the site is defined by an intact species-poor thorny hedgerow that comprises entirely of Hawthorn and Blackthorn. The hedge’s understory/ground flora supports a similar species assemblage as noted in TN2. This hedge separates the site from the adjacent agricultural field found further to the south – this appears to be heavily grazed improved grassland.</p> 
6	<p>Another well-used mammal pathway was found leading under the fencing marking the site’s southwestern boundary. This pathway was considered large enough for use by Badger, although no definitive evidence of Badger (e.g. guard hairs or footprints) was found.</p>



7 The western boundary is marked by a post and wire fence situated on a very steep bank/slope which drops approximately 10m in height down to the adjacent field parcel found further to the west. The bank supports tall ruderal and scattered scrub vegetation, with species recorded including Gorse, Bramble, Creeping Thistle, Spear Thistle, Colt's-foot, Bracken, Ragwort, Ribwort Plantain, Creeping Buttercup, Hoary Mustard and Wild Radish. There are several young/semi-mature Ash trees found along this bank (and within the larger field to the west) – these displayed signs of Ash Dieback, although had no features suitable for use by roosting bats (Negligible roosting potential). The vegetated bank was however considered to hold low potential of supporting common reptiles.



A single strand of Butterfly Bush was noted on the site's western boundary.



8 The field found adjacent to the site’s western boundary is also largely set on a steep bank which slopes downwards from east to west. This bank supports large areas of continuous Bracken, interspersed by strands of Ash. This field is grazed by goats and there is a well-used goat track along the fields eastern boundary (adjacent to the candidate site’s western boundary).





- ⊙ Target Notes
- Site Boundary
- × A2.2 Scattered Scrub
- C3.1 Tall Ruderal
- J1.3 Ephemeral Short Perennial
- A3.1 Scattered Broad-leaved Trees
- J2.1.2 Intact Species-poor Hedgerow
- J2.2.2 Defunct Species-poor Hedgerow
- J4 Bare Ground
- J2.5 Wall
- J2.4 Fence

Gearóid Hunt Celtic Homes Ltd Land at Sycamore Woods, Pembroke Dock E24129201 / DR01	Extended Phase 1 Habitat Plan BS MW 10 December 2024	<div style="text-align: center;"> <table border="1" style="width: 100%; border-collapse: collapse; font-size: 8px;"> <tr> <td style="width: 12.5%;">PRELIMINARY</td> <td style="width: 12.5%;">PLANNING</td> <td style="width: 12.5%;">DESIGN</td> <td style="width: 12.5%;">TENDER</td> <td style="width: 12.5%;">CONSTRUCTION</td> </tr> </table>     <small>4 Stangate House Stanwell Road Penarth Vale of Glamorgan CF64 2AA</small>                   Telephone:- 033 00 13 00                  e-mail:- enquiry@soltysbrewster.co.uk             </div>	PRELIMINARY	PLANNING	DESIGN	TENDER	CONSTRUCTION
PRELIMINARY	PLANNING	DESIGN	TENDER	CONSTRUCTION			