

10.09.2025
24.8058 - Upper Sycamore Woods

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 Focussed Changes Consultation.

Specifically, these representations relate to Land at Upper Sycamore Woods Pembroke Dock (formerly Candidate Site 074, now identified in the plan as allocation HSG/096/LDP2/3, focussed change FC5.GN16.PembrokeDock. 02), hereafter referred to as "the Site".

Overall, we welcome the focussed changes, which confirm the site's allocation for residential development (HSG/096/LDP2/3) and removal of the previous open space designation.

LDP Plan Period

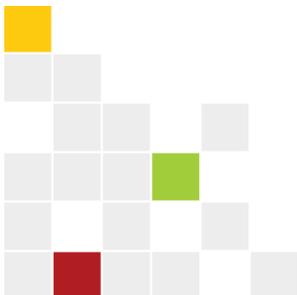
In our earlier representations, we raised concerns regarding the plan period (2017–2033).

Whilst the focussed changes do not alter the plan period, the inclusion of Upper Sycamore Woods as a new housing allocation helps mitigate some of the risks associated with the compressed Plan timeframe. Allocating our client's site for residential development contributes to increasing the Council's short-term deliverable supply, reducing reliance on longer-term allocations which may not come forward quickly enough to maintain delivery.

Pembrokeshire Local Development Plan 2 Deposit 2: Focussed Changes

Change Number: FC4.SP07.PembrokeDock.01 (DP SP 7 Settlement Boundaries)

Pembrokeshire County Council's Focussed Changes Document Part 1 (July 2025) confirms that the settlement boundary for Pembroke Dock is to be amended to include the new housing allocation reference HSG/096/LDP2/3 - Land south of Sycamore Woods and west of Lavinia Drive. We **support** this change which will provide the Council with greater flexibility to guard against non-delivery,



enabling the site to make an important contribution to the Plan's overall flexibility allowance, which is essential to overcome risks of non-delivery.

This is further supported by the fact that the Council's own delivery record demonstrates persistent under-supply. Similarly, with recent examinations across Wales (e.g Swansea and Bridgend), the examination Inspectors requested an increase in flexibility allowance to beyond 10% (13.3% and 14% respectively). Accordingly, the allocation of this site will help to ensure that the housing land supply is genuinely resilient.

We also acknowledge 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.

Change Number: FC5.GN16.PembrokeDock.02 (DP GN 16 Residential Allocations)

We fully **support** the Pembrokeshire CC's focussed change to allocate Upper Sycamore Woods for residential development.

The Deposit 2 allocations for Pembroke Dock were heavily weighted towards the medium and long term. This imbalance failed to reflect the settlement's position in the hierarchy and its role as part of the Regional Growth Area. It also risked leaving a gap in the housing trajectory, undermining delivery in the early years of the Plan.

By introducing Upper Sycamore Woods as a short- to medium-term deliverable allocation, the focussed change directly addresses these concerns. The site will:

- Deliver within 1-5 years, contributing to the provision of a "steady flow" of supply (in line with the requirements of the Development Plans Manual);
- Contribute to a balanced distribution of sites across the settlement; and
- Support Pembroke Dock's strategic role by aligning housing delivery with employment growth.

Celtic Homes Ltd is committed to progressing the Site quickly and efficiently, demonstrating to the Council genuine deliverability.

Change: FC.GN52.PembrokeDock.02 (DP GN 52 Protection of Open Spaces with Amenity Value)

We **support** the omission of 0.31Ha from GN 52 Protection of Open Spaces with Amenity Value Reference OSP/096/LDP2/10 Land at Sycamore (focussed change FC.GN52.Pembroke Dock.02).

The land that is to be omitted is of low ecological and landscape value, and currently offers no biodiversity benefit or contribution to Pembrokeshire's Green Infrastructure strategy (its previous identification therefore failed to meet Test 2).

Through the delivery of this site and 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 allocation of the Site for housing and its delivery will result in a biodiversity net benefit, providing enhanced biodiversity habitats and protecting natural landscape

features including trees, woodland and hedgerows, and the opportunity to secure measurable environmental benefits.

Private open space in the form of gardens will be provided for each of the homes on site, ensuring that a proportion of this space will be maintained as 'amenity space'.

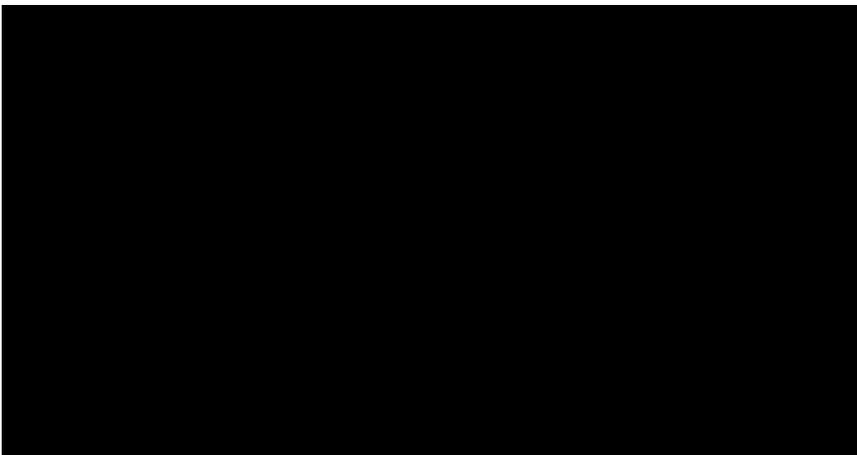
Summary

We welcome and strongly support the focussed changes which allocate Upper Sycamore Woods (HSG/096/LDP2/3) for residential development and remove its previous identification as designated amenity open space. These modifications are essential to the soundness of the Plan, addressing previous flaws and providing a genuinely deliverable allocation in a strategically important settlement.

The Site is being actively progressed by Celtic Homes Ltd, is available immediately, and can deliver within Years 1- 5 of the Plan. It will provide a high-quality scheme that meets all relevant LDP policies (including GN 43, GN 44, and GN 49), whilst delivering biodiversity net gain and reinforcing Pembroke Dock's role within the Haven Waterway Regional Growth Area.

In conclusion, the focussed change strengthens the housing trajectory, aligns the Plan with proportionate evidence, and ensures that Pembroke Dock can support both housing and economic growth in line with Future Wales 2040. Celtic Homes Ltd strongly supports this modification and remains committed to working proactively with the Council to bring the Site forward for early delivery.

Yours sincerely



Cynllun Datblygu Lleol 2 Cyngor Sir Penfro

Ffurflen Sylwadau'r Newidiadau Canolbwyntiedig

Pembrokeshire County Council Local Development Plan 2

Focussed Changes Comments Form



Yn dilyn ymgynghoriad ar y Cynllun Datblygu Lleol Adneuo 2 (CDL2), mae Cyngor Sir Penfro yn cynnig rhywfaint o 'Newidiadau Canolbwyntiedig.' Hoffem glywed eich barn ar y rhain.

Dylid defnyddio'r ffurflen hon ar gyfer yr holl sylwadau (h.y. sylwadau neu wrthwynebiadau). Mae fersiynau electronig a nodiadau cyfarwyddyd ar gael ar <https://www.sir-benfro.gov.uk/adolygur-cynllun-datblygu-lleol/newidiadau-canolbwyntiedig> Os ydych yn cyflwyno copi ar bapur, dylech atodi tudalennau ychwanegol lle bod angen.

Sylwer bod rhaid i sylwadau berthyn i'r Newidiadau â Ffocws arfaethedig yn unig, ac nid i agweddau eraill ar y Cynllun Datblygu Lleol ar Adnau.

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 15 Medi 2025. Dychwelwch y ffurflenni at: ldp@pembrokeshire.gov.uk neu

Y Tîm Cynlluniau Datblygu, Neuadd y Sir, Freeman's Way, Hwlfordd, Sir Benfro, SA61 1TP

Following consultation on the Deposit Local Development Plan 2 (LDP2), Pembrokeshire County Council is proposing some 'Focussed Changes'. We would like your views on these.

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/focussed-changes> If you are submitting a paper copy, attach additional sheets as necessary.

Please note that representations must relate only to the proposed Focussed Changes, and not to other aspects of the Deposit LDP.

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 15th September 2025. Please return forms to: 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

Eich manylion/manylion eich cleient

Your / your client's details

Manylion yr asiant (os ydynt yn berthnasol)

Agent's details (if relevant)

Enw
Name

Teitl swydd (lle y bo'n berthnasol)
Job title (where relevant)

Sefydliad (lle y bo'n berthnasol)
Organisation (where relevant)

Cynllun Datblygu Lleol 2 Cyngor Sir Penfro

**Pembrokeshire County Council
Local Development Plan 2**



Ffurflen Sylwadau'r Newidiadau Canolbwyntiedig

Focussed Changes Comments Form

Cyfeiriad Address	
Rhif ffôn Telephone no	
E-bost Email address	
Llofnodwyd Signed	
Dyddiad Date	10.09.2025

RHAN B: Eich sylw

PART B: Your representation

Eich enw / sefydliad

Boyer Planning

Your name / organisation

1. Pa newidiadau canolbwyntiedig rydych yn rhoi sylwadau arnynt?

1. Which Focussed Changes are you commenting on?

Cyfeirnod(au) y Newidiadau Canolbwyntiedig

Focussed Change reference number(s)

FC4.SP07.PembrokeDock.01

FC5.GN16.PembrokeDock.02

FC.GN52.PembrokeDock.02

2. Cyn i chi esbonio eich sylwadau'n fanwl, byddai'n dda gwybod p'un a gredwch, o ganlyniad i'r Newidiadau Canolbwyntiedig, fod y Cynllun yn gadarn ai peidio, neu a ydych o'r farn bod rhannau ohono neu bob rhan ohono'n ansad a bod angen ei newid.

I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd. Os ydych yn ansicr, gadewch yr adran hon yn wag.

2. Before you set out your comments in detail, it would be helpful to know whether you think that, as a result of the Focussed Changes, the Plan is sound or that all or parts of it are unsound.

For more information on soundness and procedural requirements, see the guidance notes. If you are unsure, leave this section blank.

Rwyf o'r farn bod y CDLI yn gadarn

✓

**Cynllun Datblygu Lleol 2 Cyngor Sir
Penfro**

**Pembrokeshire County Council
Local Development Plan 2**



**Ffurflen Sylwadau'r Newidiadau
Canolbwyntiedig**

Focussed Changes Comments Form

I think the LDP is sound	
<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	

Cynllun Datblygu Lleol 2 Cyngor Sir Penfro

**Pembrokeshire County Council
Local Development Plan 2**



**Ffurflen Sylwadau'r Newidiadau
Canolbwyntiedig**

Focussed Changes Comments Form

3. Rhestrwch eich sylwadau isod.

Esboniwch pam rydych yn gwrthwynebu neu'n cefnogi'r Newidiadau Canolbwyntiedig a nodir. Lle bo'n bosibl, nodwch pa newidiadau sydd eu hangen i wneud y Cynllun Datblygu Lleol yn gadarn. Dylech gynnwys yr holl wybodaeth, tystiolaeth a gwybodaeth ategol sy'n angenrheidiol i gefnogi eich sylw. 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.

3. Please set out your comments below.

Explain why you object to or support the identified Focussed Changes. Where possible, identify what changes are needed to make the LDP sound. Include all the information, evidence and supporting information necessary to support your representation. 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 see associated statement.

Ticiwch yma os ydych yn cyflwyno rhagor o ddeunydd i gefnogi eich sylw.

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

✓

Cynllun Datblygu Lleol 2 Cyngor Sir Penfro

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Local Development Plan 2**



**Ffurflen Sylwadau'r Newidiadau
Canolbwyntiedig**

Focussed Changes Comments Form

5. Os ydych yn gwrthwynebu Newid Canolbwyntiedig neu ydych chi eisiau 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, bydd yr Arolygydd yn pennu'r weithdrefn fwyaf priodol er mwyn darparu ar gyfer y rhai sydd eisiau rhoi tystiolaeth lafar.

5. If you are objecting to a Focussed Change, 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 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.

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.

✓

Rwyf am siarad mewn sesiwn gwrandawriad.

I want to speak at a public hearing.

Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod ynglŷn â beth rydych chi eisiau siarad (e.e. 'Safle tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').

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').

6. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith hoffech chi gael eich clywed.

6. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.

Hoffwn i gael fy nghlywed yn Gymraeg.

I wish to be heard in Welsh.

Hoffwn i gael fy nghlywed yn Saesneg.

I wish to be heard in English.

Cynllun Datblygu Lleol 2 Cyngor Sir Penfro

Ffurflen Sylwadau'r Newidiadau Canolbwytiedig

**Pembrokeshire County Council
Local Development Plan 2**

Focussed Changes Comments Form



Nodiadau cyfarwyddyd

Guidance notes

*Bydd Cynllun Datblygu Lleol 2 (CDL2) Cyngor Sir Penfro yn cael 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. A yw'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)*
- 2. A yw'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'r gofynion gweithdrefnol yn Arweiniad Gweithdrefnol ar Archwiliadau Cynllun Datblygu Lleol yr Arolygiaeth Gynllunio.

Yn dilyn ymgynghoriad ar fersiwn Cynllun Adnueo 2 o Gynllun Datblygu Lleol 2, mae Cyngor Sir Penfro yn gwneud nifer gyfyngedig o 'newidiadau â ffocws' i wneud y Cynllun yn gadarn cyn ei archwilio. Ymgynghorir ar y newidiadau hyn cyn bod yr archwiliad yn dechrau. Caiff unrhyw ymatebon eu hanfon ymlaen yn uniongyrchol at yr Arolygydd Cynllunio.

Os ydych yn gwrthwynebu Newid Canolbwytiedig, dylech ddweud pam mae'n peri i'r Cynllun fod yn ansad a sut dylid newid y Newid Canolbwytiedig er mwyn gwneud y Cynllun yn gadarn.

Lle rydych yn cynnig newid i'r Newid Canolbwytiedig byddai'n ddefnyddiol egluro

The Pembrokeshire County Council Local Development Plan 2 (LDP2) 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.

Having consulted on the Deposit Plan 2 version of LDP2, Pembrokeshire County Council is making a limited number of 'Focussed Changes' to make the Plan sound before it is examined. These changes are being consulted upon before the examination starts. Any responses will be forwarded directly to the Planning Inspector.

If you are objecting to a Focussed Change, you should say why you think it makes the Plan unsound, and how the Focussed Change should be changed to make the Plan sound.

Where you propose a change to a Focussed Change it would be helpful to make clear which test(s) of soundness you believe it fails. Failing to identify a test will not mean that your comments will not be considered, providing it

**Cynllun Datblygu Lleol 2 Cyngor Sir
Penfro**

**Ffurflen Sylwadau'r Newidiadau
Canolbwyntiedig**

**Pembrokeshire County Council
Local Development Plan 2**



Focussed Changes Comments Form

pa brawf (profion) cadernid rydych yn credu ei fod yn eu methu. 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 ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio mwy nag un newid i'r Cynllun, nid yw bob amser yn angenrheidiol llenwi ffurflenni ar wahân ar gyfer pob rhan o'ch sylw. Gall fod, fodd bynnag, yn ddefnyddiol defnyddio 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 adnabod cynrychiolydd y grŵp (neu'r prif ymarferydd) yn glir.

relates to the Focussed Changes. You should include all your comments on the form, using accompanying documents and supporting evidence where necessary.

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.