

**Emma Evans**

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**From:** [REDACTED]  
**Sent:** 05 December 2024 13:26  
**To:** LDP - For Enquiries  
**Cc:** Office Administrator  
**Subject:** Pembrokeshire County Council Local Development Plan 2 - Deposit LDP 2  
**Attachments:** Comments Form - Land North of Park Gardens, Begelly.pdf; Comments Form - Land North of New Road.pdf; Comments Form - Land to Rear of Newton Hall.pdf; Comments Form - Land North of Begelly Farm.pdf; Alternative Site Report - Land off Park Gardens, Begelly.pdf; Thompstone, Begelly, Killgetty-A3 Location plan.pdf; Thompstone, Begelly, Killgetty-A3 Site plan.pdf; Ecological Appraisal Report.pdf; Candidate Site Report - Land off Park Gardens, Begelly.pdf

**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.***

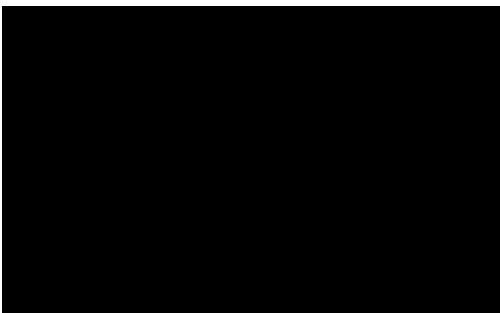
Good afternoon,

Further to the recent publication of the Deposit 2 version of the Pembrokeshire LDP2, please find attached a submission with respect to an Alternative Site objection in relation to land North of Park Gardens, Begelly. in conjunction with this, please also find the completed forms for further objections to 3 Residential Allocations and Commitments in the Begelly and Kilgetty areas.

We trust that the above and attached are in order, but should you have any questions or queries, please do not hesitate to contact me.

**Kind Regards**

**Jason D Evans**





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**

**Eich manylion/manylion eich cleient**  
**Your / your client's details**

**Manylion yr asiant (os ydynt yn berthnasol)**  
**Agent's details (if relevant)**

Enw Name	Mr D Thompstone	Jason Evans
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Evans Banks Planning Ltd
Cyfeiriad Address	c/o Agent	
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	05/12/2024	



Date		
<b>RHAN B: Eich sylw</b>		
<b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	Mr D Thompstone c/o Evans Banks Planning Ltd	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	GN16 – Residential Allocations	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)		
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)		
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X	
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.		
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b>		



Ticiwch bob un sy'n berthnasol.

### 3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

X

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

**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).**

**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).**

Enw'r safle

Site name

Land North of Park Gardens, Begelly

Cyfeiriad y cais

Site reference

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.

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 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/profion 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.

Please see accompanying Alternative Site Report.

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

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

Please see accompanying Alternative Site Report.

### **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.*

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.

X

*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').*



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').

Policy GN16

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

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

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

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/broffion 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 ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

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.



*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.





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.

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## **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	Mr D Thompstone	Jason Evans
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Evans Banks Planning Ltd
Cyfeiriad Address	c/o Agent	
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	05/12/2024	



Date		
<b>RHAN B: Eich sylw</b>		
<b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	Mr D Thompstone c/o Evans Banks Planning Ltd	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	GN17 – Residential Commitments - 050/00040 (Land North of New Road, Begelly)	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)		
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)		
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X	
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.		
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b>		



Ticiwch bob un sy'n berthnasol.

### 3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

**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).**

**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).**

Enw'r safle

Site name

Cyfeiriad y cais

Site reference

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.

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 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/profion 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.

Please refer to representation made in relation to Candidate Site CS 100 – Land North of Park Gardens, Begelly.

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

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.*

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.

X

*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').

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').

Policy GN17

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

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

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

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/broffion 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 ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

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.





*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.



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**

**Eich manylion/manylion eich cleient**  
**Your / your client's details**

**Manylion yr asiant** (os ydynt yn berthnasol)  
**Agent's details** (if relevant)

Enw Name	Mr D Thompstone	Jason Evans
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Evans Banks Planning Ltd
Cyfeiriad Address	c/o Agent	
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	05/12/2024	



Date		
<b>RHAN B: Eich sylw</b>		
<b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	Mr D Thompstone c/o Evans Banks Planning Ltd	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	GN17 – Residential Commitments - 050/00034 (Land to rear of Newton Hall, Kilgetty)	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)		
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)		
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X	
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.		
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b>		



Ticiwch bob un sy'n berthnasol.

### 3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

**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).**

**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).**

Enw'r safle

Site name

Cyfeiriad y cais

Site reference

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.

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 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.

Please refer to representation made in relation to Candidate Site CS 100 – Land North of Park Gardens, Begelly.

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

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.*

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.

X

*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').

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').

Policy GN17

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

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

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

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:

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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.

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Lle cynigiwch newid i'r Cynllun, byddai o gymorth esbonio pa brawf/broffion 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 ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

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*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.



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**

**Eich manylion/manylion eich cleient**  
**Your / your client's details**

**Manylion yr asiant** (os ydynt yn berthnasol)  
**Agent's details** (if relevant)

Enw Name	Mr D Thompstone	Jason Evans
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)		Evans Banks Planning Ltd
Cyfeiriad Address	c/o Agent	
Rhif ffôn Telephone no		
E-bost Email address		
Llofnodwyd (gallwch teipio) Signed (can be typed)		
Dyddiad	05/12/2024	



Date		
<b>RHAN B: Eich sylw</b>		
<b>PART B: Your representation</b>		
Eich enw / sefydliad Your name / organisation	Mr D Thompstone c/o Evans Banks Planning Ltd	
<b>1. Ar ba ran/rannau o'r Cynllun (neu ddogfennau ategol) rydych yn rhoi sylwadau?</b> <b>1. Which part(s) of the Plan (or supporting documents) are you commenting on?</b>		
Rhif(au) polisi Cynllun Datblygu Lleol neu ddyraniad safle LDP policy or site allocation number(s)	GN16 – Residential Allocation HSG/003/LDP2/01 (North of Begelly Farm)	
Rhif(au) paragraff y Cynllun Datblygu Lleol neu adran LDP paragraph or section number(s)		
Cyfeiriad(au) Map Cynigion y Cynllun Datblygu Lleol LDP Proposals Map reference(s)		
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.		
<b>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.</b> <i>I gael rhagor o wybodaeth am gadernid a gofynion gweithdrefnol, gweler y nodiadau cyfarwyddyd.</i> <b>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.</b> <i>For more information on soundness and procedural requirements, see the guidance notes.</i>		
Rwyf o'r farn bod y CDLI yn gadarn ac yn bodloni gofynion gweithdrefnol. I think the LDP is sound and meets procedural requirements.		
Rwyf o'r farn nad yw'r CDLI yn gadarn ac y dylid ei newid. I think the LDP is unsound and should be changed.	X	
Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni. I think that the procedural requirements have not been met.		
<b>3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?</b>		



Ticiwch bob un sy'n berthnasol.

### 3. Would you like the LDP to include a new policy, site allocation or paragraph?

Tick all that apply.

Dyraniad safle newydd

New site allocation

Polisi newydd

New policy

Paragraff neu destun ategol newydd

New paragraph or supporting text

**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).**

**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).**

Enw'r safle

Site name

Cyfeiriad y cais

Site reference

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.

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 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.

Please refer to representation made in relation to Candidate Site CS 100 – Land North of Park Gardens, Begelly.

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

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.*

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.

X

*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').

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').

Policy GN16

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

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

*Rwy'n dymuno cael fy nghlywed yn Gymraeg.*

I wish to be heard in Welsh.

*Rwy'n dymuno cael fy nghlywed yn Saesneg.*

I wish to be heard in English.

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/broffion 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 ychwanegol a thystiolaeth ategol lle bod angen.

Os ydych yn ceisio am fwy nag un newid i'r

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.



*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.*

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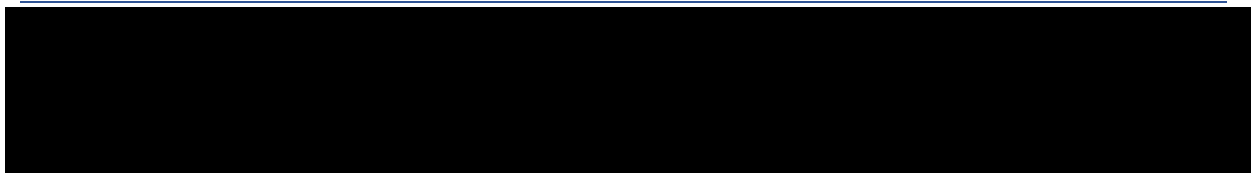


**ALTERNATIVE SITE SUPPORTING STATEMENT**  
**FOR**  
**PEMBROKESHIRE LOCAL DEVELOPMENT PLAN 2017-**  
**2033 – DEPOSIT 2**

**LAND NORTH OF PARK GARDENS, BEGELLY, PEMBROKESHIRE**

On behalf of  
Mr D Thompstone

Our Ref: 1000.a  
Date: December 2024  
Prepared by: JDE



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<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>3</b>
<b>2.0</b>	<b>SITE CONTEXT .....</b>	<b>4</b>
2.1	THE SITE .....	4
2.2	THE ADJOINING SETTLEMENT .....	6
<b>3.0</b>	<b>THE PROPOSAL .....</b>	<b>8</b>
3.1	DEVELOPMENT OVERVIEW .....	8
3.2	INFRASTRUCTURE CONSIDERATIONS .....	9
3.3	BIODIVERSITY CONSIDERATIONS .....	9
<b>4.0</b>	<b>POTENTIAL DEVELOPMENT OVERVIEW .....</b>	<b>11</b>
4.1	PROPOSED HOUSING ALLOCATIONS .....	11
<b>5.0</b>	<b>CONSIDERATION OF SITE BY LPA TO DATE .....</b>	<b>14</b>
<b>6.0</b>	<b>SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE .....</b>	<b>15</b>
<b>7.0</b>	<b>COMPATIBILITY OF PROPOSAL WITH LDP STRATEGY AND SOUNDNESS OF PLAN ....</b>	<b>17</b>
7.1	THE LDP STRATEGY .....	17
7.2	SOUNDNESS OF PLAN .....	18
<b>8.0</b>	<b>SUMMARY AND CONCLUSION .....</b>	<b>19</b>
8.1	SUMMARY .....	19
8.2	CONCLUSION .....	20

## 1.0 INTRODUCTION

- 1.1 Evans Banks Planning has been instructed by Mr D Thompstone (the Land Owner) to prepare and submit an Alternative Site Supporting Statement for the allocation of land North of Park Gardens, Begelly for the purposes of residential development in the forthcoming Pembrokeshire Local Development Plan 2. The land had been previously put forward as a Candidate Site for allocation within the LDP during the call for Candidate Sites and its reference was CS 100. A copy of the previously submitted Candidate Site Supporting Statement and associated documentation accompanies this current submission.
- 1.2 This Report has been prepared in response to the publication of the Pembrokeshire Local Development Plan 2 - Deposit 2 Plan (hereinafter referred to as 'the Deposit 2 LDP') by the local planning authority (LPA) and has been prepared in line with the LPAs guidance published as part of its Deposit 2 LDP Representation Form. As a result, following a brief description of the Site and its proposed use, the following information and assessment is provided:
- Commentary on the proposals for housing development in the local area
  - Review and comment on LPA assessment of Site at Candidate Site Stage
  - Sustainability Appraisal of Site and proposed use
  - Compatibility of proposal with LDP Strategy
- 1.3 The Report then concludes with a summary of the information presented.
- 1.4 It should also be noted that this Report should be read in conjunction with objections lodged against a number of proposed Allocations and Commitments for the local area by Evans Banks Planning Ltd.



## 2.1 THE SITE

### Plan A

A photograph of a residential street in a new housing development. A dark blue pickup truck is parked on the left side of the road. The street is lined with modern, two-story houses. The sky is overcast.

### Photograph 1

- 2.1.3 As a result, the Alternative Site has a currently ‘developed’ appearance, although its northern and eastern boundaries are clearly defined by established hedgerows and tree lines. Its western boundary then adjoins existing residential development (Photograph 2), whilst its southern boundary then leads on to the aforementioned under-construction development (Photograph 3).



**Photograph 2**



**Photograph 3**

- 2.1.4 Access to the Site is then currently gained via the estate road of the adjoining developed site, which in turn then leads on to the A478 to the west of the Site, as well then as via a small groups of residential properties know as Park Gardens at the Site’s south western corner.
- 2.1.5 Under the provisions of the current Pembrokeshire Local Development Plan, the site (edged in black) adjoins the Development Limits (edged in red) for the settlement of Begelly, as illustrated in the plan below.

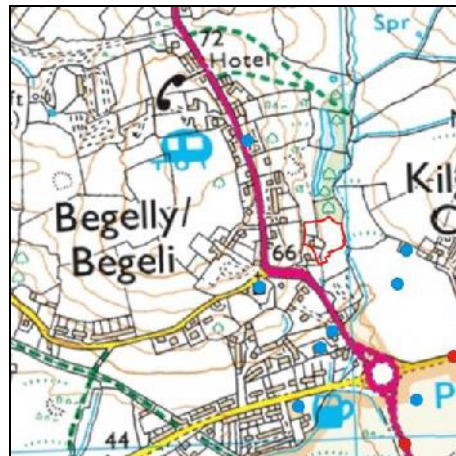


**Plan B**

2.1.6 As can be seen, the Alternative Site has a close association in the immediate sense with the existing form of the settlement to its south and west, including an adjoining housing development. As a result of a combination of these factors, the Site therefore represents a logical opportunity for the expansion of the urban form at this location.

## **2.2 THE ADJOINING SETTLEMENT**

2.2.1 As detailed above, the Alternative Site adjoins the existing settlement and form of Begelly. As a result, the Site is within walking distance of a number of its wide range of community facilities and local services, marked by the blue circles on the map below, as well as those found in nearby Kilgetty.



**Plan C**

2.2.2 From an accessibility perspective, Begelly has access to a number of very well served bus stop (circled red on Plan C). The bus services serving the settlement are numbers 351, 352, 361, 381 and X49, which provide regular access to the following larger settlements, as well as the intervening villages:

- Tenby
- Haverfordwest
- Narberth

2.2.3 The strong sustainable position of Begelly should therefore be given full consideration when considering potential future growth options.

## 3.0 THE PROPOSAL

### 3.1 DEVELOPMENT OVERVIEW

- 3.1.1 It is proposed that the Alternative Site be allocated in the forthcoming replacement LDP for the purposes of 18 residential units. The illustrative layout (reproduced below) that accompanies this submission demonstrates that the Site is capable of accommodating this number in a deliverable and sustainable manner, taking into account its setting, topography and boundary features.



Plan D

- 3.1.2 As illustrated above, the Site is capable of accommodating a mix of unit sizes, but taking into account the existing form of development adjoining and surrounding the Site, it is suggested that two storey dwellings would be the most appropriate form of unit at this location. The associated density – 18 units – has therefore taken into consideration these design parameters.
- 3.1.3 With regards then to access, it is proposed that the Alternative Site would gain access directly off the public highway running along the western edge of the Site,



both in terms of any new estate road or private individual drives. The point of access onto the public highway for the proposed estate road has been chosen by taking into account the Site's existing topography and the level of visibility afforded by this section of the public highway. It should be also noted, that were the adjoining land to continue to be allocated for the purposes of residential development, an acceptable access that met with the LHA requirements could be provided as part of the development of the Alternative Site.

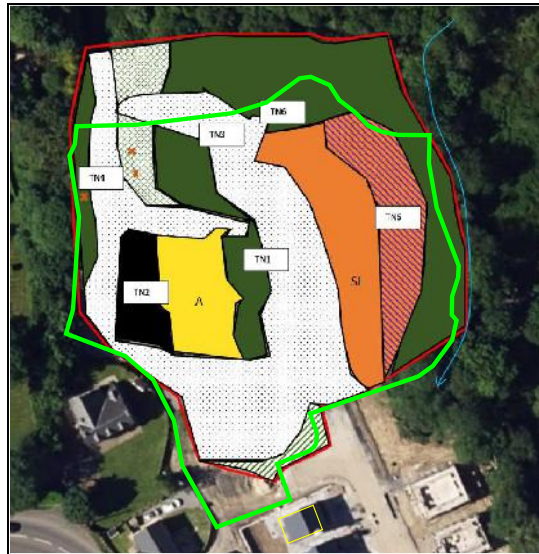
- 3.1.4 Due to the proximity of existing facilities and the Site's scale, the proposal does not include any formal areas of open space. However, it is recognised and supported that an element of the proposal would be expected to contribute towards the provision of affordable housing within the local area.

### **3.2 INFRASTRUCTURE CONSIDERATIONS**

- 3.2.1 Any development of the Alternative Site for residential units would be served by mains water and electricity, connections to which lie within the adjoining stretch of public highway. We understand then that foul water would be dealt with by means of a connection to the public sewer system.
- 3.2.2 With regards to surface water, neither the Alternative Site nor adjoining land show evidence of poor drainage conditions (e.g. water settlement etc.). As a result, it is considered that there would be no obstruction to any development of the site in terms of the disposal of surface water.

### **3.3 BIODIVERSITY CONSIDERATIONS**

- 3.3.1 Accompanying the original Candidate Site submissions was an Ecological Appraisal Report, which included a Phase I Survey Map of the habitats present on the Alternative Site and adjoining area, which is reproduced below, with the Alternative Site indicated by the light green line.



**Plan E**

- 3.3.2 As can be seen from the photographs in Section 2, the current habitat mix on site remains largely unchanged, although some areas of semi-natural broadleaf woodland have receded since the original survey was undertaken.
- 3.3.3 As a result, any detailed design for the Alternative Site's development would include provision for biodiversity enhancement and management to avoid further loss of high value elements, but continuing to ensure that it is capable of delivering the proposed number of units. As a result, there are no ecological constraints to the delivery of the site for the purposes of residential development.

## 4.0 POTENTIAL DEVELOPMENT OVERVIEW

### 4.1 PROPOSED HOUSING ALLOCATIONS

- 4.1.1 Geographically, Begelly is closely linked to the adjoining settlement of Kilgetty, with the two sharing the extensive community facilities and local services found within each of the communities. Paragraph 3.10 of the Deposit 2 LDP cites this as an important factor in determining the distribution of growth during the Plan period, stating the following

*“A weighting system has been applied which gives greatest weight to those facilities identified as being likely to reduce the need to travel and therefore most likely to be considered a sustainable location. The greatest levels of growth (housing sites of 5 or more) are located in settlements which are at a Service Village level or higher within the Settlement Hierarchy.”*

- 4.1.2 Kilgetty is classed as a Service Centre and Begelly is then classed in the subsequent level in the Settlement Hierarchy as a Service Village. As a result, both should be expected to include housing allocations as part of the newly prepared Deposit 2 LDP to contribute to their growth. The table below therefore provides an indication of the proposed allocations and the number of units expected to be delivered within the Plan period for the two settlements as set out in the Deposit 2 LDP, together with any relevant planning history.

Settlement	Site	Ref.	Units	Planning History
Kilgetty	South of Rock Park	HSG/050/LDP2/1	19	New Allocation. Promoted at Candidate Site Stage.
Begelly	North of New Road	HSG/003/LDP2/01	28	New Allocation. Promoted at Candidate Site Stage.

Table 1

- 4.1.3 The Deposit LDP also now includes under the provisions of Policy GN.17 a series of residential allocations considered to be ‘commitments’, with the following being proposed for the two settlements in question.

Settlement	Site	Ref.	Units	Planning History
Kilgetty	Land to rear of Newton Hall	050/00043	19	Various planning consents granted during two previous Plan periods, but no development has commenced to date. Not promoted at Candidate Site Stage.
Begelly	North of New Road	003/00040	35	Consent granted in 1997 (Ref. No. 96/0687/PA), but no units have been constructed to date. Not promoted at Candidate Site Stage. Deposit 2 LDP anticipates that a further 35 units will be constructed beyond Plan period.
Begelly	Barley Park Close	003/00025	20	Development of site now almost completed.

**Table 2**

- 4.1.4 In terms of Kilgetty, the single proposed new housing allocation follows on from a recently completed development directly to its north. With regards then to commitments, the Deposit LDP 2 includes a single site for 19 units. Whilst this site is considered to be a 'commitment', the site has to date failed to deliver any new residential units, despite being allocated for residential purposes since the adoption of the current LDP. The 'commitment' of the delivery of the site is in serious question.
- 4.1.5 Turning then to Begelly, the Deposit 2 LDP has put forward one new allocation and has what it considers to be two commitments. In terms of the allocation – land North of New Road – this is a newly proposed allocation. It is an area of undeveloped land, located some distance from the core services offered by Begelly and Kilgetty, with no existing pedestrian linkage to them. Its proposed point of access is also of concern, as the available land, ground levels, curvature of the road and its horizontal alignment appears to be unable to deliver a safe vehicular means of access that would meet the Authority's required standards. This combined with the significant loss of the mature tree belt at the frontage of the site in our view raises serious questions over the deliverability of the site (particularly in view of recent changes to Chapter 6 of Planning Policy Wales) and for this reason it should not represent one of the proposed housing allocations of the Replacement LDP, as such an action would result in the Plan being unsound.
- 4.1.6 With regards then to 'commitments', two sites have been designated as such for the settlement of Begelly. The first – land at Barkely Close Park – is nearing completion and so is evidently able to deliver the assigned 20 units during the Plan period.

- 4.1.7 The second commitment – North of Begelly Farm – raises significant concerns with regarding to the Plan’s reliance on it as a contribution to the delivery of new housing units within the Plan period. The site is a long-standing housing allocation that has been part of two previous Development Plans. Despite this support from the LPA for its development, it has failed to be developed and has failed to produce a single residential unit.
- 4.1.8 Although it currently benefits from an extant consent through the commencement of minor works, it is clear that such actions which took place some time ago have merely been part of a process of ‘land-banking’, rather than a commitment to deliver actual residential units. It is noted that the Authority itself also now appears to be questioning its delivery having halved the number of expected units to be delivered by the site during the emerging Plan period from 70 units to 35 units.
- 4.1.9 The failure of the delivery of proposed commitment 003/00040 is perhaps unsurprising when the context of local development trends are taken into consideration. The total scale of the proposed commitment is for 70 units, whilst the aforementioned delivered sites in Kilgetty are of a scale that is less than half this size. In addition, a recently constructed scheme directly to the south of the Alternative Site (delivered by our Client) is of a similar scale, demonstrating that medium sized developments are what are deliverable in the local context. The fact that commitment 003/00040 continues to fail to deliver any new units since its first allocation some years ago is further testament to this. On this basis, we have significant concerns with regard to the continued allocation of land North of New Road as the inclusion of such an undeliverable site will result in the Plan being unsound.
- 4.1.10 In summary, it is evident that growth proposals for Begelly and Kilgetty are relying on a number of undeliverable housing allocations and commitments (amounting to over 100 units). In order to ensure that the Deposit 2 LDP is sound and capable of reaching its housing targets, deliverable alternative sites are therefore required.

## 5.0 CONSIDERATION OF SITE BY LPA TO DATE

- 5.1 The Site subject of this Report was promoted at the Alternative Site stage as edged red on Plan A of this Report.
- 5.2 We understand that all Candidate Sites have undergone an assessment by the LPA as part of the preceding LDP preparation process. However, the only available information on the Candidate Site subject of this report was as presented in the following table of the respective document.

100	Land at Park Gardens / Trian Park Gardens	Begelly / Begelly	Vacant / Gwaig	Housing / Tai	Green 1	0.41	Part passed all phases, part phase 4	Part included within settlement boundary to reflect existing permission. Remainder of site excluded due to Ecology and other sites more suitable for allocation.	Red 4
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Figure 1

- 5.3 The reference to the 'part allocation' of the Alternative Site in fact relates to the area already within the defined settlement limits, shown in Plan B of this Statement. No change therefore is proposed between the current LDP and the emerging LDP.
- 5.4 The comment in relation 'Ecology' is then somewhat confusing. Whilst the northern and eastern boundaries are strongly defined by mature trees, these would not form part of any 'active' development of the site, as illustrated in Plan D of this Statement. Furthermore, as shown by the photographs in this report, the site is currently predominantly used as a store for recently excavated soil and subsoil and so has not been naturalised in any significant way. Its 'ecological' value is therefore questioned and we have yet to receive any information or evidence from the Authority to quantify this justification for the Site's non-allocation.
- 5.5 The second reason for the exclusion of the site from allocation for residential development is then stated as being "... other sites more suitable for allocation.". For the reasons set out in Section 4 of this Statement, this is clearly not the case and such sites are neither suitable nor deliverable, which has in turn resulted in the LDP as currently presented being unsound.



## 6.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE

6.1.1 The Alternative Site was not subject to the Sustainability Appraisal process as set out by the LPA. However, the process and strategic objectives criteria used for such an assessment are found at Chapter 3 of the LDP2 Sustainability Report, which forms part of the LDPs Evidence Base. Using the information contained within this report and that in the accompanying Candidate Site Supporting Statement, the following table therefore provides a sustainability appraisal of the Alternative Site against the topic areas in Chapter 1.

Topic	Strategic Objective	Result
Population	1. Develop and maintain a balanced population	++
Human Health	2. Promote and improve human health and well-being through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment.	+
Education and Skills	3. Improve education opportunities to enhance the skills and knowledge base.	0
Transport	4. Minimise the need to travel and encourage sustainable modes of transport.	++
Social Fabric	5. Provide a range of high quality housing including affordable housing to meet local needs	++
	6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities.	++
	7. Protect and enhance the role of the Welsh language and culture.	0
Economy	8. Provide a range of good quality employment opportunities accessible to all sections of the population	+
	9. Support a sustainable and diverse local economy	+
Climatic Factors	10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change	+
Air Quality	11. Maintain and improve air quality	0
Material Assets (Waste and Minerals and Use of Resources)	12. Minimise the generation of waste and pollution	0
	13. Encourage the efficient production, use, re-use and recycling of resources.	+
Water and Soil	14. Maintain and protect the quality of inland and coastal water	+
	15. Reduce the impacts of flooding and sea level rises	+
	16. Use land efficiently and minimise contamination	+
	17. Safeguard soil quality and quantity	-
Biodiversity, Fauna and Flora	18. Maintain, enhance and value biodiversity and promote the resilience of ecosystems.	+
Cultural, Heritage (architecture, Archaeology and Landscape)	19. Protect and enhance the landscape and geological heritage	0
	20. Encourage quality locally distinct design that complements the built heritage.	+
	21. Protect, enhance and value the built heritage and historic environment.	0

**Table 3**

### Summary

6.1.2 The above appraisal highlights that the Alternative Site represents a sustainable option for further development. The appraisal in fact highlights that the development of the site due to its scale, current form and closer proximity to community facilities and local services means that it

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scores better than both those allocations currently being put forward by the Deposit LDP for the settlement of Begelly.

- 6.1.3 In conclusion therefore, the development of the Alternative Site subject of this report would not only represent a sustainable candidate for development, but would also represent a site with a higher level of sustainability than that currently proposed for residential allocations by the Authority.

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## 7.0 COMPATIBILITY OF PROPOSAL WITH LDP STRATEGY AND SOUNDNESS OF PLAN

### 7.1 THE LDP STRATEGY

7.1.1 As detailed above, Chapter 3 of the Deposit 2 LDP provides an indication of the document's Strategy. In terms of the distribution of growth, this is to be based on a Settlement Hierarchy, based on the following scale:

1. Main Town
2. Rural Town
3. Service Centre
4. Service Village
5. Cluster Local Village
6. Local Village

7.1.2 As outlined previously in this report, the distribution of growth is to be proportionate to the role and position of the respective settlement in the above hierarchy. On this subject, Paragraph 3.10 states that *"The greatest levels of growth (housing sites of 5 or more) are located in settlements which are at a Service Village level or higher within the Settlement Hierarchy."*

7.1.3 With regards then to the split of the majority of growth, the Plan highlights that a 60%/40% split has been chosen in terms of urban/rural areas. This is explained further at Paragraph 3.14, which states *"A 60%/40% split is also more likely to be deliverable than 70%/30% split. This is because it directs growth to a greater range of small and medium sized sites, instead of focusing growth on a small number of large sites in urban areas."* It goes on then to state that *"Previous experience of LDP1, suggests that these sites are more easily delivered, in particular by smaller independent builders."*

7.1.4 In summary therefore, the allocation of the Alternative Site in question for the purposes of residential development would accord with the LDP Strategy and the LDP would be sound if the site were to be included in the final Plan.

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## **7.2 SOUNDNESS OF PLAN**

- 7.2.1 Further to the above, the LPA have included a Guidance Note as part of their Deposit 2 LDP Representation Form 3 tests with which to assess the soundness of the Plan, with or without any changes proposed.
- 7.2.2 Taking into consideration the above and the evidence found within this Report, it is clear that the deliverability and sustainability level of the Alternative Site and its proposed use does not conflict with any of the Tests' requirements. In fact, through its allocation, it will help to address the failure of proposed allocations to meet the requirements of Tests 2 and 3, as the two proposed allocations/commitments for Begelly will be unable to deliver their anticipated level of new housing units.
- 7.2.3 In summary therefore, the Alternative Site meets all the Tests set out by the LPA and so its inclusion as part of the LDP would ensure the soundness of the Plan.

## 8.0 SUMMARY AND CONCLUSION

### 8.1 SUMMARY

- 8.1.1 The overarching national planning policy document for Wales is Planning Policy Wales (Edition 12). In terms of all aspects of Development Plans, PPW sets out at Paragraph 1.22 that they must “... *provide **certainty** for developers and the public about the type of development that will be permitted at a particular location.*”. Paragraph 1.26 then goes on to provide more specific guidance in relation to Local Development Plans, setting out that they should “... *set out a vision for how places are expected to change in land use terms to accommodate development needs over the plan period. This provides **certainty** for developers and the public about the type of development that will be permitted at a particular location.*”.
- 8.1.2 Planning Policy Wales (supported by the Local Development Plan Manual) identifies the process of establishing a level of housing provision a development plan should make during its lifetime. A key component of achieving the identified level of growth, is ensuring that any sites allocated for housing development are ‘deliverable’, with paragraph 4.2.11 defining a deliverable sites being “... *free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities.*”.
- 8.1.3 The evidence presented as part of this report and as part of objections submitted in relation to other housing allocations/commitments proposed by the Deposit 2 LDP for the related settlement and area has shown that these currently proposed allocations/commitments are not meeting this underlying requirement in the preparation of an LDP. In particular, the decision to continue to rely on a historic allocation that has yet to provide a single unit for in excess of 20 years is unacceptable and results in the core strategy of the LDP being undermined.

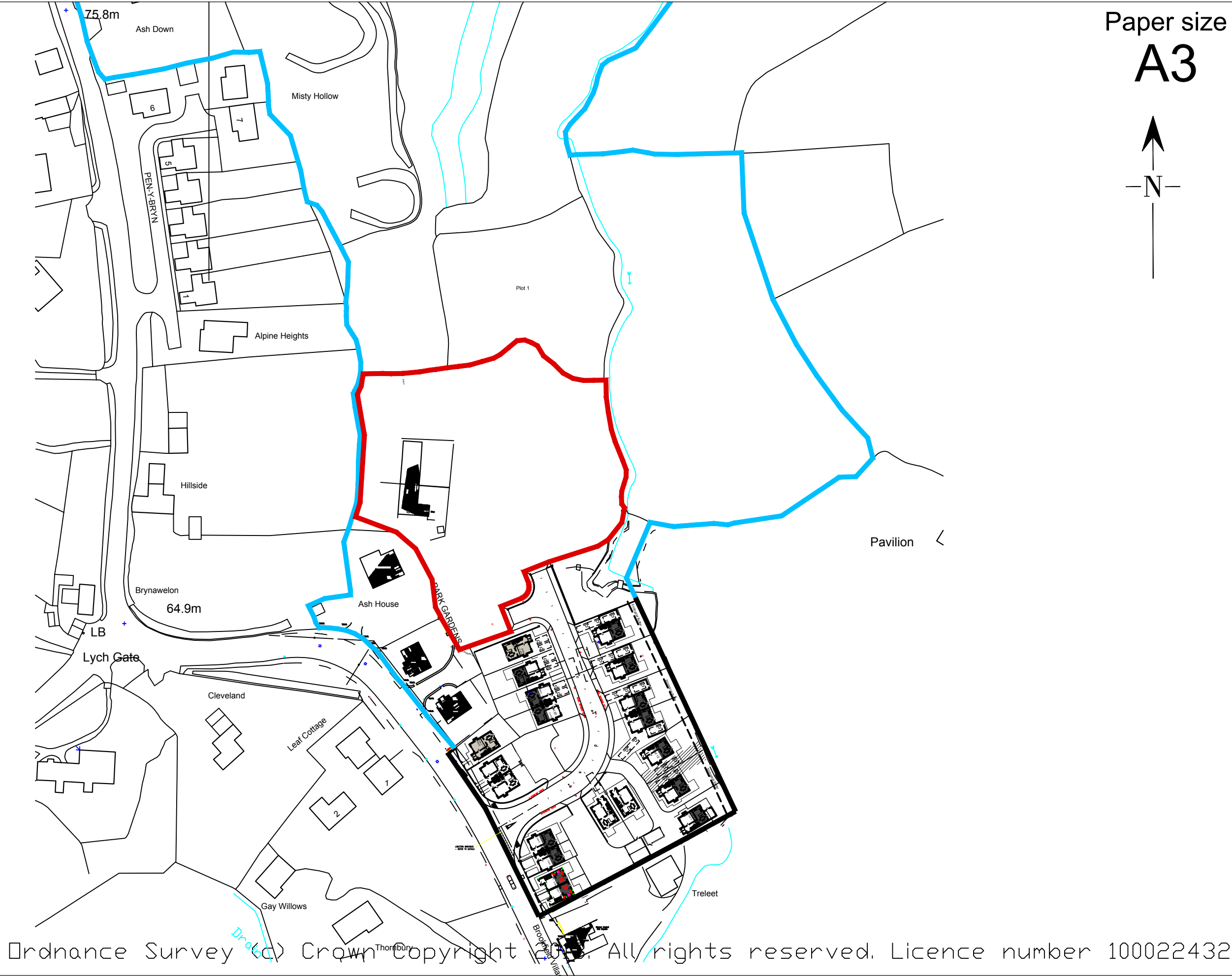
8.1.4 In contrast to the current approach adopted by the Authority, the Alternative Site in question forms a logical, sustainable and deliverable extension to an existing part of the settlement. Contrary to the LPAs erroneous and inaccurate assessment of the Site, the Site's development is capable of being served without any detriment to any known ecological interest and there are no obstacles to its delivery.

8.1.5 In addition to the above, the information in this Report has not only demonstrated that the Site is deliverable, but that it will also score well against the LPAs SA criteria and indeed better than the two other proposed housing allocations for the settlement of Begelly. Furthermore, it has been demonstrated that unlike other proposed allocations in the emerging LDP, the allocation of the Alternative Site will accord with the LDP strategy and will ensure that through its allocation that the final version of the Plan would be sound in relation to this aspect.

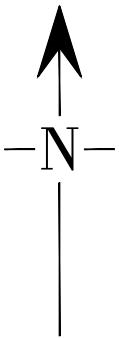
## **8.2 CONCLUSION**

8.2.1 In view of the above and information provided in this report, it is respectfully requested that the Alternative Site in question be allocated for residential development.





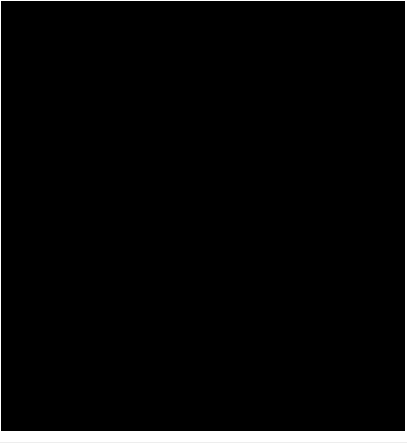
Paper size  
**A3**



DR  
Design

Architectural Services

JOB TITLE :



Do Not Scale From This Drawing

DRAWING TITLE :

Site Location plan

Original paper size - A3

SCALE :

1/1250

DRAWN BY :

LJW

DATE :

July 2018

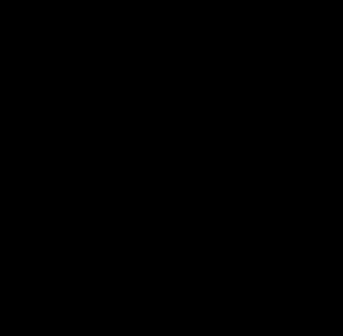
PLAN No

REVISION

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## Architectural Services

- 1.5acre
- 12 plots per acre.
- House type proposed is to be 104m<sup>2</sup> 3 bed.
- Approximate private road length = 35m
- Approximate adoptable road length = 120m



DRAWING TITLE :

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1/500

LJW

July 2018

REVISION

Ordinance Survey (c) Crown Copyright 2011. All rights reserved. Licence number 100020449

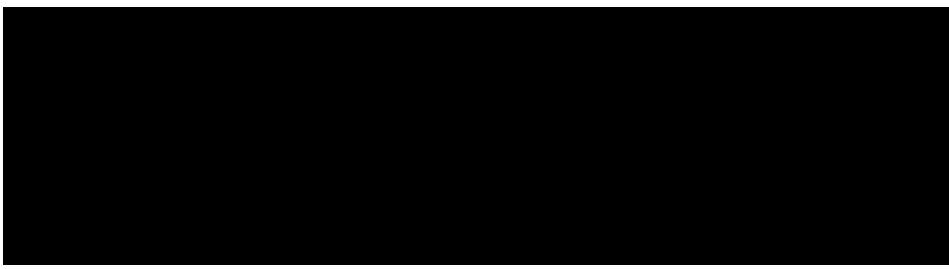


## **Ecological Appraisal Report:**

Proposed Residential Development at;  
Former Tea Rooms  
Begelly  
Kilgetty,  
Pembrokeshire SA68 0YH

**July 2018**

**Contact:**



## Contents

<b>Summary</b>	<b>2</b>
<b>1. Introduction</b>	<b>3</b>
<b>2. Methodology</b>	<b>4</b>
2.2 Badgers	
2.3 Otters	
2.4 Dormouse	
2.5 Birds	
2.6 Bats	
2.7 Reptiles	
2.8 Amphibians	
2.9 Water Vole	
<b>3. Results</b>	<b>6</b>
3.1 Desk Study	
3.2 Site Appraisal	
<b>4. Ecological Assessments</b>	<b>14</b>
<b>5. Conclusions and Recommendations</b>	<b>16</b>
<b>6. Legislation</b>	<b>17</b>
<b>7. References</b>	<b>23</b>
<b>8. Legal Disclaimer</b>	<b>24</b>
<b>9. Species lists</b>	<b>25</b>
<b>10.WWBIC Data Search</b>	<b>27</b>

## Summary

I & G Ecological Consulting were commissioned to undertake an ecological appraisal (updated Phase 1) of an area of land approximately 0.6 hectares in size, located at The Former Tea Rooms, Kilgetty, Pembrokeshire (See Fig. 1 for location). This assessment is a preliminary ecological survey, updating earlier surveys (Soltys Brewster 2013) in support of an LDP allocation and future planning application for a proposed extension to housing development which is currently under construction.

The land within the site boundary consists predominantly of disturbed ground/made ground with residual pockets of broadleaved trees and a small area of Marshy Grassland adjacent to Riparian corridor.

No signs of protected species were encountered on the site.

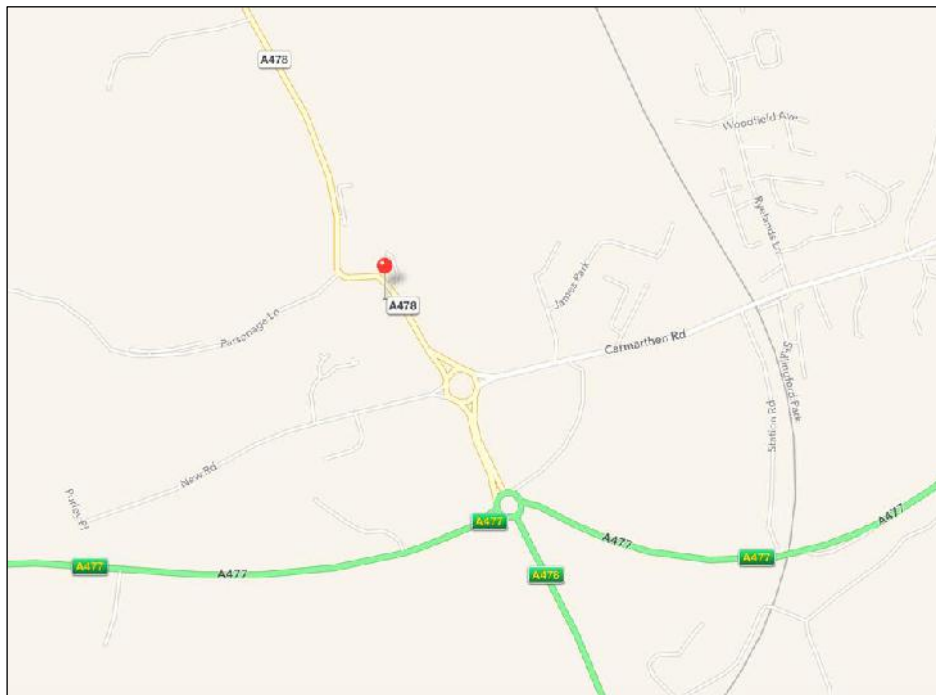


Figure 1: Location Map (from Google® Maps)





Figure 2: Aerial view showing approximate site boundary (from Google® Maps).

In terms of the application, a large proportion of the site is ‘made ground’ and is of low ecological interest and the remaining ecological features (trees, grassland, riparian zone) can be mitigated or protected. No evidence of European protected species was observed on the site, however there is potential for Otter and Reptiles. There are a number of non-native garden shrubs which are somewhat invasive but will not require chemical treatment.

## 1. INTRODUCTION

- 1.1.1 I & G Ecological Consulting were commissioned to undertake an updated ecological appraisal of an area of land at The Former Tearooms, Begelly, Pembrokeshire. The site is approximately 0.6 hectares in size. The report is in support of a submission for inclusion in the future LDP (see Fig. 3 for indicative layout).
- 1.1.2 This report presents the findings of both a desk study and a site appraisal undertaken in July 2018. The report outlines the ecological constraints/opportunities associated with the site.



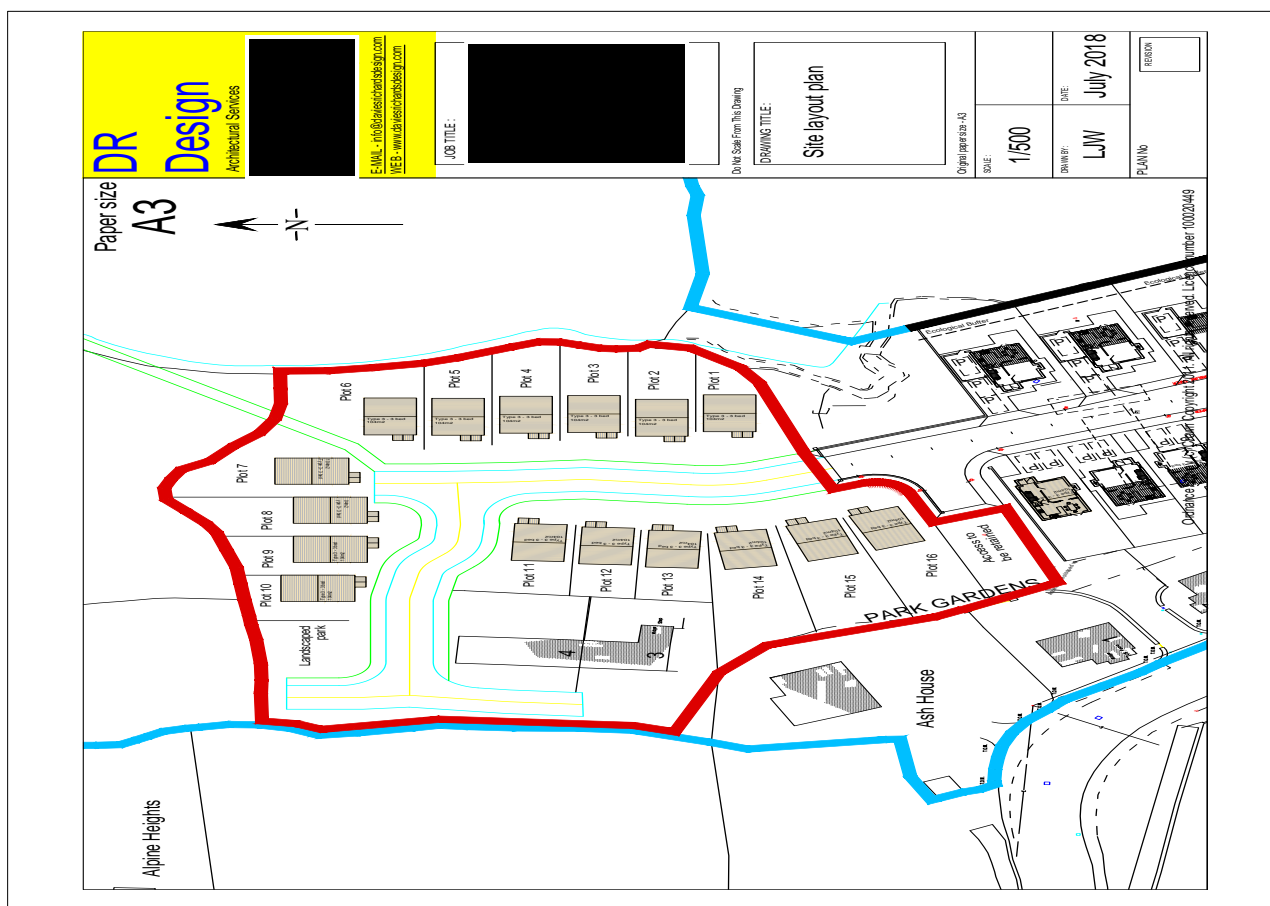


Figure 3: Plan drawing courtesy of JCR Planning/DR Design

## 2. METHODOLOGY

- 2.1.1 Both a desk-based survey and an ecological site survey were undertaken to establish the ecological conditions on site.
- 2.1.2 A field botanical survey was carried out using survey methods that were based on standard Phase 1 Habitat survey techniques. The CIEEM Guidelines for Preliminary Ecological Appraisal were also followed and adhered to.

### 2.2 Badgers

- 2.2.1 The surrounding habitat was assessed for its suitability for Badgers which includes the presence of setts, well-worn paths and runs, snagged hair, latrines, footprints and foraging. Any such incidental signs of badgers were recorded if they were encountered.

### 2.3 Otters

- 2.3.1 The surrounding habitat was assessed for its suitability to support otters. The area was searched for Otter field signs such as spraint marking, slides, hovers or footprints.

### 2.4 Dormouse

- 2.4.1 The habitats on site, particularly the woodland were assessed for their suitability to support Dormice.

## **2.5 Birds**

- 2.5.1 The habitats on site were assessed for their suitability for breeding birds, including trees, scrub and grassland.

## **2.6 Bats**

- 2.6.1 Habitats on site were assessed for their suitability to support bats, particularly any trees on site that could have bat roosting potential or opportunities.

## **2.7 Reptiles**

- 2.7.1 The habitats on site were assessed for their suitability to support reptiles.

## **2.8 Amphibians**

- 2.8.1 The habitats on site were assessed for their suitability to support amphibians.

## **2.9 Water Voles**

- 2.9.1 The surrounding habitats on site were assessed for their suitability to support water voles.

## **2.10 Non-Native Invasive Species**

- 2.10.1 Any pernicious weeds under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended) were also noted and mapped during the site survey. These species include Japanese Knotweed (*Fallopia japonica*) and Himalayan Balsam (*Impatiens glandulifera*).

### 3. RESULTS

#### 3.1 Desk study

3.1.1 A data search was requested from the West Wales Biodiversity Information Centre for the planning application site and surrounding area of up to 2km. A number of protected and a few notable species records were returned within the 2km of the site centre.

3.1.2 The findings from the data search are summarised below:-

##### 3.1.3 Birds

The data search returned 90 records of birds which are categorised as priority species within 2km of the site. The closest records were 38m from the site for the following species: House Sparrow, Barn Owl and Bullfinch. The total bird species recorded included:-

- Barn Owl – *Tyto alba* – Schedule 1 and LBAP species
- Bullfinch – *Pyrrhula pyrrhula* – LUKBAP and LBAP species
- Cuckoo – *Cuculus canorus* – LBAP species
- Dunnock – *Prunella modularis* - UKBAP species
- Grasshopper Warbler – *Locustella naevia* – LBAP species
- Herring gull – *Larus argentatus* - UKBAP
- House Sparrow – *Passer domesticus*
- Lesser Spotted Woodpecker- *Dendrocopos minor* - S7, UKBAP
- Linnet – *Linaria cannabina* - LBAP species
- Marsh Tit - *Poecile palustris* - S7, UKBAP
- Red Kite – *Milvus milvus* -Schedule 1 and LBAP species
- Redwing – *Turdus iliacus* –Schedule 1 and LBAP species
- Reed Bunting - *Emberiza schoeniclus* - LBAP species
- Song Thrush – *Turdus philomelos* – UKBAP and LBAP species
- Spotted Flycatcher - *Muscicapa striata*
- Starling – *Sturnus vulgaris* - LBAP species
- Tree pipit – *Anthus trivialis*) – LBAP species
- Willow tit – *Poecile montana* – UKBAP and LBAP species
- Wood Warbler - *Phylloscopus sibilatrix* S7
- Yellowhammer – *Emberiza citronella* CAT1 S7 LBAP species

##### 3.1.4 Mammals

The data search returned 97 records of mammals within 2km of the site, these included:-

- 48 records of Bats (Pipistrelle species, Common pipistrelle, Soprano pipistrelle, Brown long eared, Myotis species, Noctule, Daubenton's, Natterer's, Serotine, Greater and Lesser Horseshoe and Whiskered) closest record being 67m from the site
- 21 Records of Bader, the closest being 67m from the site
- 10 records of Hedgehog, recorded 123m from the site
- 2 records for Hazel Dormouse the closest at 529m from site
- 1 record of Otter, beyond the 2km search buffer

### 3.1.5 Invertebrates

The data search returned 39 records of invertebrates within 2km of the site. There are multiple records at 336m from the site. The species recorded included the following:-

- Blood-vein moth – *Timandra comae*
- Cinnabar moth – *Tyria jacobaeae*
- Dark-barred Twin-spot Carpet – *Xanthorhoe ferrugata*
- Dot Moth - *Melanchra persicariae*
- Grey Dagger - *Acronicta psi*
- Garden Tiger moth – *Arctia caja*
- Green-brindled Crescent – *Allophytes oxyacanthae*
- Powdered Quaker – *Orthosia gracilis*
- Sallow moth – *Cirrhia icteritia*
- Shoulder-striped Wainscot – *Leucania comma*
- Shaded Broad-bar – *Scotopteryx chenopodiata*
- Small Heath – *Coenonympha pamphilus*

### 3.1.6 Plants

The data search returned 7 records of plants within 2km of the site. The closest record is 403 from the site. The species recorded were all for Bluebell – *Hyacinthoides non-scripta* - LBAP species.

### 3.1.7 Reptiles

The data search returned 15 records of reptiles within 2km of the site. The closest were for Slow Worm (*Anguis fragilis*), with the closest record being 123m from the site, Grass Snake (*Natrix Helvetica*) was recorded at 464m from the site and Adder (*Vipera berus*) at 1062m from the site.

### 3.1.8 Amphibians

The data search returned 17 records of amphibians within 2km of the site. These included 8 entries (with historic records) for Common Frog (*Rana temporaria*,) and 6 entries (with historic records) of Common Toad (*Bufo bufo* ) and 3 entries for Palmate Newt (*Lissotriton helveticus*).

### 3.1.9 Statutory Designated Sites

The data search returned no records for SSSI or SACs. However, there are 27 Ancient Woodland sites, 11 NRW Priority Areas (Woodland) and 1 Regionally Important Geodiversity Site.

### 3.5 Site Appraisal

#### 3.5.1 On site survey

- 3.5.2 The site survey was undertaken on 20<sup>th</sup> July 2018 by a suitably qualified ecologist (See Fig. 5 for site map). Where possible, the habitats were cross referenced to any important UK priority habitats or local habitats adopted by the Local Biodiversity Action Plan.
- 3.5.3 The land within the red line site boundary comprises of Made ground, remnant woodland and scrub, Marshy Grassland/Neutral Grassland mosaic adjacent to a stream, which forms the Eastern boundary. There is also a residential building and associated gardens which may be demolished to form part of the future development site. See Fig. 6 for habitat map.



Figure 5: Area surveyed edged red (from Google.co.uk)



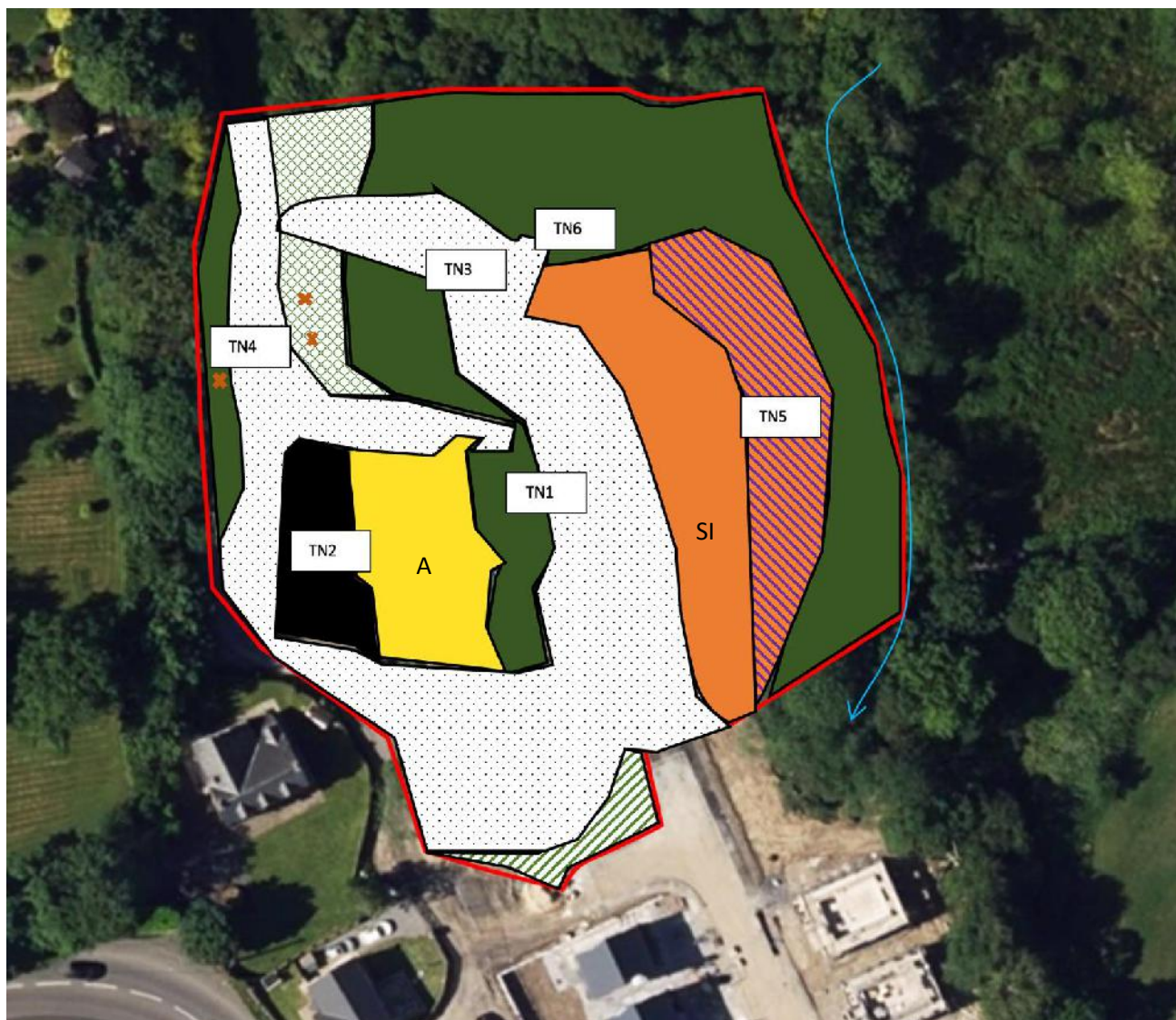


Figure 6: Phase 1 survey map and target notes (TN), (digitised from Google.co.uk)

Colour	Phase 1 Habitat Code	Habitat Name
	J1.2	Amenity Grassland
	J4	Bare Ground
	A1.1.1	Broadleaved semi natural woodland
	B2.1	Semi improved neutral grassland
	B5	Marshy Grassland
	A1.2	Plantation
	J3.6	Buidlings
	A2.1	Dense continuous Scrub
	J1.4	Introduced shrub
	G2	Running water



Habitats recorded within red line boundary were as follows:-

### **3.6 Made ground**

- 3.6.1 Around 1/3 of the site is made ground, mostly soil and other spoil from the adjacent new development. Much of this appears to have been recently deposited as there is no vegetation on the majority of it.



**Figure 7: Recently deposited earth from adjacent site**

### **3.7 Marshy Grassland (Target Notes – TN5)**

- 3.7.1 The Marshy Grassland area, although relatively small, is quite diverse, with tall herbs such as Meadow Sweet, Fleabane and Willow-herb, together with Pendulous Sedge, Greater Birds-foot Trefoil and other species indicative of damp meadows.

### 3.8 Neutral Grassland (regenerated on spoil)

- 3.8.1 A higher plateau of previously deposited material is developing into neutral grassland, but still has pioneering species associated with succession of previously developed land. Such species include Willow-herb species, Fat Hen, Lesser Trefoil and Sow Thistle. (Species list in Section 9).



Figure 8: Previously Developed Land/Neutral Grassland

### 3.9 Wet Woodland (and residual secondary broadleaved woodland)

#### (Target Notes – TN1 + TN6)

- 3.9.1 Wet woodland dominated by Willow species and Alder forms part of the north-eastern boundary and is part of the riparian corridor along the eastern boundary (TN6).
- 3.9.2 A number of mature Sycamore, Ash and smaller Hazel are left standing on an earth bank (this may have been the original ground level) and there is evidence of Bluebell, which maybe the native species *Hyacinthoides non-scripta* (TN1).





**Figure 9 & 10: Bluebells on earth bank supporting a line of residual Mature Ash/Sycamore**



**Figure 11 & 12: Wet woodland with developing grassland to fore (TN 6)**

### **3.10 Mature Treelines (boundary banks and riparian zone)**

3.10.1 There are mature trees surrounding much of the site. The western boundary supports mature Birch, Sycamore and some ornamental Fir trees, on a bank with the main road beyond. The eastern boundary follows the stream and consists of deciduous species including Holly, Willow, Hazel and Alder.



**Figure 13 & 14: Deciduous and coniferous trees to boundaries (and tipped material TN3, garden shrubs TN4)**

### **3.11 Building (Target Notes – TN2)**

3.11.1 The existing dwellings included in the red line boundary may be demolished to maximise space. The buildings appeared to be relatively new and were well maintained with no obvious gaps to roof, soffit, fascia etc.

### **3.12 Badgers**

3.12.1 No evidence of badger activity was found within the grassland and tree-lined boundaries.

### **3.13 Bats**

3.13.1 No features likely to support bat roosts were present within the development boundary (no extensive assessment was made of the domestic building, however it looked to be well maintained and so is unlikely to be suitable for use by bats). The hedgerows/treelines are likely to provide flight lines and foraging opportunities for generalist species such as Pipistrelle.

### **3.14 Otters**

3.14.1 No evidence of Otter activity was noted on site. There has been a high level of disturbance during construction of Phase 1 of the development, however the remainder of the land (within blue line ownership) is suitable for Otter and there is marshy grassland adjacent.

### **3.15 Reptiles**

3.15.1 The site consists of both tall, short and scrubby vegetation, bare ground and rubble/tree stumps, which therefore offers the structural complexity that reptiles require to provide suitable ecotone areas for basking and cover.

### 3.16 Amphibians

3.16.1 No ponds or slow-flowing open water were present within the site. Therefore, the habitat present was considered to be unsuitable to support a breeding population of amphibians, however the larger site (north of the redline boundary) supports scrub and a large pond which has the potential to support amphibians.

### 3.17 Hazel Dormouse

3.17.1 There are no hedgerows on the site, save for lines of mature trees. Much of the scrub has been cleared from the site and the high level of disturbance on site is likely to have resulted in any animals moving north into the remaining vegetation of the larger site.

### 3.18 Water Voles

3.18.1 No suitable water vole habitat, such as ditches, slow-flowing streams or ponds or other wetland habitats were present on site. Therefore, the habitat present was considered to be unsuitable to support Water Voles. However, more suitable habitat lies north of the site.

## 4. ECOLOGICAL ASSESSMENTS

4.1.1 The following values have been provided to assess the importance of an ecological feature value within a geographical context, as recommended within the CIEEM Guidelines for Ecological Impact Assessment (2016) and the CIEEM Guidelines for Ecological Report Writing (Dec.2015).

### 4.1.2 Table 1: Ecological Value Assessments

Importance	Examples of features
International & European	European designated or proposed sites such as Ramsar Sites, Special Protection Areas, Special Areas of Conservation, World Heritage sites or Biosphere Reserves; or otherwise meeting criteria for European or International designation. Sites supporting populations of European important species. Species listed within the Annex's of The Conservation of Habitats & Species Regulations 2017.
National	Nationally designated sites such as Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), areas of key habitats and species within the UK Biodiversity Action Plan. Sites supporting viable breeding populations of Red Data Book (RDB) species (excluding scarce species), or supplying critical elements of their habitat requirements. Species listed within the schedules of the Wildlife & Countryside Act 1981.

Regional	Sites containing viable areas of threatened habitats and species listed in a regional Biodiversity Action Plan, sites exceeding Site of Importance for Nature Conservation (SINC) criteria. Sites supporting viable populations of Nationally Scarce species or those included in the Regional Biodiversity Action Plan on account of their rarity, or supplying critical elements of their habitat requirements.
High Local	Sites meeting the criteria for a county, vice county or metropolitan area designation (such as SINC), which may include amenity and educational criteria in urban areas. Ancient semi-natural woodland. Designated Local Nature Reserves. Sites containing viable areas of any key habitat type or species identified in the Local Biodiversity Action Plan (LBAP). Sites supporting viable breeding populations of species known to be county/metropolitan rarities e.g. featuring in county 'red data book' or LBAP, or supplying critical elements of their habitat requirements.
Moderate Local	Undesignated sites or features considered appreciably to enrich the habitat resource within the context of the Borough or District, or included in the Borough or District LBAP. Amenity and educational functions will be recognised in urban areas. Sites with viable breeding populations of species listed as rare in the District or Borough LBAP or supplying critical elements of their habitat requirements.
Low Local	Undesignated sites or features considered appreciably enriching the habitat resource within the context of the Parish or neighbourhood.
Negligible	Low-grade and widespread habitats.

#### 4.1.3 Table 2: Impact level Criteria

Severe	Permanent impacts
Major	Loss of feature and/or quality and integrity of feature; severe damage to key characteristics, features or elements.
Moderate	Loss of feature, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
Minor	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements
Negligible	Very minor loss or detrimental alteration to one or more characteristics, features or elements
Neutral	No impacts

## 4.2 Assessments on the Habitats & Species Identified During the Survey

### 4.3. Made Ground

- 4.3.1 The 'made ground' (spoil heaps) have little or no ecological value. The habitat value has been assessed as: **Negligible**.



#### **4.4 Marshy Grassland**

- 4.4.1 The grassland presents a variety of plants indicative of wet grassland and whilst it will support a number of invertebrates, its small size limits its ecological value. Its value was assessed as: **Negligible**

#### **4.5 Neutral Grassland (regenerated spoil)**

- 4.5.1 This grassland supports a variety of plants indicative of dry (regenerating) grassland and whilst it will support a number of invertebrates, its small size limits its ecological value. Its value was assessed as: **Negligible**

#### **4.6 Wet Woodland (and residual secondary woodland)**

- 4.6.1 Part of the wet woodland and secondary broadleaved woodland/scrub has been encroached upon due to earth movement (spoil from the current development) but sufficient remains connected to similar habitats within and adjacent to the remaining larger site. The habitat value has been assessed as: **Low Local**.

#### **4.7 Mature tree-line boundary**

- 4.7.1 The mature treeline and bank forming the western boundary is principally native broadleaf trees but also contains a number of mature conifers. Together with the scrub along the bank below the trees, this feature will support foraging bats and nesting birds. Its value was assessed as: **Low Local**

### **5. CONCLUSIONS AND RECOMMENDATIONS**

- 5.1 The combination of desk and field surveys undertaken at the proposed development site identified that the majority of the area within the site boundary has Low-local to negligible ecological value.

#### **5.2 Otters**

- 5.2.1 It is recommended that the stream be protected by a minimum 7m vegetated buffer zone, fenced off before construction commences.

#### **5.3 Reptiles**

- 5.3.1 There are suitable habitats and refugia opportunities on the site currently. It is recommended that based on the results of previous reptile surveys (Soltys Brewster), a reptile working method statement be agreed in advance of any further development of the site.

#### **5.4 Birds**

- 5.4.1 All nesting birds are protected under Section 1 of the Wildlife and Countryside Act of 1981. Therefore, vegetation clearance should be planned outside the nesting bird season.

## 5.5 Tree-line

The tree-lines are likely to provide nesting opportunities for birds, cover for small mammals and invertebrates and flight lines for bats. It is recommended that the trees are retained and protected from development by suitable Root Protection Zones as per any approved Tree Survey that may be submitted.

## 6. LEGISLATION

### 6.1 Otters and the Law.

6.1.1 The otter is a European Protected Species (EPS). It is against the law to damage or destroy an otter breeding site or resting place, or deliberately to capture, kill, injure or disturb an otter.

6.1.2 Otters are fully protected by the following pieces of legislation:

- The Conservation of Habitats and Species Regulations 2017 (regulation 42) fully protects otters, making it **an offence to:-**
  - *Intentionally or deliberately capture, injure or kill an Otter.*
  - *Damage or destroy a breeding or resting place of an Otter, or intentionally or recklessly damage or destroy any structure or place used for shelter or protection*
  - *Intentionally or recklessly disturb an Otter in a place used for shelter or protection , or deliberately disturb Otters in such a way as to be likely significantly to affect (i) the ability of any significant group of Otters to survive, breed, rear or nurture their young, or (ii) the local distribution or abundance .*
  - *Intentionally or recklessly obstruct access to a place used for shelter or protection.*
  - *Possess an Otter (alive or dead), or any part of an Otter*
- Schedule 5 of the Wildlife and Countryside Act 1981 (as amended by the CROW [Countryside Rights of Way] Act 2000) fully protects otters, making it **an offence to:-**
  - *Intentionally or recklessly disturb any otter while it is occupying a structure or place which it uses for shelter or protection*
  - *Intentionally or recklessly obstructs access to any structure or place used by an otter for shelter or protection*
  - *Sell, offer or expose for sale any otter*

6.1.3 For any disturbance to occur a derogation or **EPS licence** must be gained from Natural Resources Wales. To gain an EPS Licence from Natural Resources Wales (NRW), NRW must be satisfied that;

- i. granting the licence would not be detrimental to the Favourable Conservation Status (fcs) of the populations of species concerned within its natural range.
- ii. the derogation (licence) is in the public interest of Health and Safety or for other reasons of over-riding public interest, including those of a socio-economic nature or will have a benefit of primary importance to the environment.

- iii. there is no satisfactory alternative to the derogation which would allow the described development to proceed but which would avoid or reduce the need for any adverse impact to the species.

6.1.4 Otters are also protected by;

- Natural Environment and Rural Communities Act 2006.
- Annex II Habitats Directive (protection through Special Areas of Conservation)
- UK Biodiversity Action Plan Priority Species and Species of Principal Importance in Wales

## 6.2 Bats and the Law.

6.2.1 Bats are protected by the following pieces of legislation:

- Schedule 5 and 6 of the Wildlife and Countryside Act 1981 (as amended by the CROW [Countryside Rights of Way] Act 2000)
- The Environmental Damage (Prevention & Remediation) Regulations 2009 – A protected species and its habitat is protected under this legislation as well as others.
- The Conservation of Habitats and Species Regulations 2017 (regulation 42) fully protects all bats and their roosts, making it **an offence** *to deliberately kill, injure or capture* (take) bats; *to deliberately disturb bats; damage or destroy bat roosts* or resting places (this is considered an “Absolute Offence” as damage and destruction may detrimentally effect the Continuous Ecological Functionality of that roost / resting place); possess or transport a bat or any part of a bat; sell (or offer for sale) or exchange bats or parts of bats.
- For any disturbance to occur a derogation or **EPS licence** must be gained from Natural Resources Wales. To gain an EPS Licence from Natural Resources Wales (NRW), NRW must be satisfied that;
  - i. the licence would not be detrimental to the Favourable Conservation Status (fcs) of the populations of species concerned within its natural range.
  - ii. the derogation (licence) is in the public interest of Health and Safety or for other reasons of over-riding public interest, including those of a socio-economic nature or will have a benefit of primary importance to the environment.
  - iii. there is no satisfactory alternative to the derogation which would allow the described development to proceed but which would avoid or reduce the need for any adverse impact to the species.

6.2.2 Bats are also protected by;

- Appendix III of the Bern Convention
- Appendix II of the Bonn Convention (including the Convention's Agreement on the conservation of Bats in Europe)
- Natural Environment and Rural Communities Act 2006 and now the Environment (Wales) Act 2016.

- All bats are listed in Annex IV of the EC Habitats Directive and the British species listed in Schedule 2 of the Habitats Regulations 1994 (as amended) and are therefore designated as *European Protected Species*. These *protected* species are afforded enhanced protection and more stringent licensing provisions than those protected by the Wildlife and Countryside Act (WACA) alone.

### 6.3 The Hazel Dormouse and the Law

6.3.1 The hazel dormouse is a European Protected Species (EPS). It is against the law to damage or destroy a dormouse breeding site or resting place (summer or hibernation nest), or deliberately to capture, kill, injure or disturb a dormouse.

6.3.2 Dormice are fully protected by the following pieces of legislation:

- The Conservation of Habitats and Species Regulations 2017 (regulation 42) fully protects dormice, making it **an offence to:-**
  - *Intentionally or deliberately capture, injure or kill a dormouse.*
  - *Damage or destroy a breeding or resting place of a dormouse, or intentionally or recklessly damage or destroy any structure or place used for shelter or protection*
  - *Intentionally or recklessly disturb a dormouse in a place used for shelter or protection, or deliberately disturb dormouse in such a way as to be likely significantly to affect (i) the ability to survive, breed, rear or nurture their young, and includes in the case of animals of a hibernating or migratory species, to hibernate or migrate or (ii) the local distribution or abundance.*
  - *Intentionally or recklessly obstruct access to a place used for shelter or protection.*
  - *Possess a dormouse (alive or dead), or any part of a dormouse*
- Schedule 5 of the Wildlife and Countryside Act 1981 (as amended by the CROW [Countryside Rights of Way] Act 2000) fully protects dormice, making it **an offence to:-**
  - *Intentionally or recklessly disturb any dormouse while it is occupying a structure or place which it uses for shelter or protection*
  - *Intentionally or recklessly obstructs access to any structure or place used by a dormouse for shelter or protection*
  - *Sell, offer or expose for sale any dormouse*

6.3.3 For any disturbance to occur a derogation or **EPS licence** must be gained from Natural Resources Wales. To gain an EPS Licence from Natural Resources Wales (NRW), NRW must be satisfied that;

- i. granting the licence would not be detrimental to the Favourable Conservation Status (fcs) of the populations of species concerned within its natural range.

- ii. the derogation (licence) is in the public interest of Health and Safety or for other reasons of over-riding public interest, including those of a socio-economic nature or will have a benefit of primary importance to the environment.
- iii. there is no satisfactory alternative to the derogation which would allow the described development to proceed but which would avoid or reduce the need for any adverse impact to the species.

6.3.4 Dormice are also protected by;

- Natural Environment and Rural Communities Act 2006 and in Wales by the Environment (Wales) Act 2016.
- Annex II Habitats Directive (protection through Special Areas of Conservation)
- UK Biodiversity Action Plan Priority Species and Species of Principal Importance in Wales

## 6.4 Reptiles and the Law

- 6.4.1 All of the UK native reptiles are protected by law. The common species of reptiles found in this locality are common lizard, slow-worm, adder and grass snake. It is illegal to intentionally kill or injure these species under Section 9 (1) of the Wildlife and Countryside Act 1981 (as amended).
- 6.4.2 All native UK reptiles are considered of 'principle importance' under Section 7 of the Environment (Wales) Act 2016. This places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.
- 6.4.3 Under the National Planning Policy Framework (NPPF April 2012), the presence of any Protected Species (which includes all reptiles species) are a material planning consideration. The ODPM 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact within the Planning System, provide additional advice and support the NPPF.

## 6.5 Amphibians and the Law

- 6.5.1 All of the UK native amphibians are protected by law. The common species of amphibians in this locality are common frog, common toad, smooth newt and palmate newt. It is illegal to intentionally kill or injure these species under Section 9 (1) of the Wildlife and Countryside Act 1981 (as amended).
- 6.5.2 The common toad is considered of 'principle importance' under Section 7 of the Environment (Wales) Act 2016. This places a duty on every public authority, in exercising its functions, to have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.
- 6.5.3 Under the National Planning Policy Framework (NPPF April 2012), the presence of any Protected Species (which includes the Common Toad) are a material planning consideration.

The ODPM 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact within the Planning System, provide additional advice and support the NPPF.

## **6.6 Birds and the Law**

6.6.1 All species of bird are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended). Protection was extended by the Countryside and Rights of Way (CROW) Act 2000. Under the above legislation it is an offence to intentionally:

- kill, injure or take any wild bird;
- take, damage or destroy the nest of any wild bird while that nest is in use or being built; or
- take or destroy an egg of any wild bird.

6.6.2 Certain species are listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) and receive protection under Sections 1(4) and 1(5). The protection was extended by the Countryside and Rights of Way (CROW) Act 2000. There are special penalties where the offences listed above are committed for any Schedule 1 species and it is also an offence to intentionally or recklessly:

- disturb any such bird when it is building its nest or while it is in or near a nest containing dependant young; or
- disturb the dependant young of any such bird.

## **6.7 Badgers and the Law**

6.7.1 The protection of Badgers Act 1992 makes it illegal to kill, injure or take a badger, or interfere with a sett. In addition, they are listed on Schedule 6 of the Wildlife & Countryside Act 1981, which prohibits certain methods of killing and capture.

## **6.8 Water Voles and the Law**

6.8.1 Water voles are listed under Schedule 5 of the Wildlife & Countryside Act 1981, receiving full protection since 2008. The Wildlife & Countryside Act 1981 (as amended), lists the following offences:-

- Intentionally kill, injure or take water voles (Section 9 (1)).
- Possess or control live or dead water voles or derivatives (Section 9 (2)).
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection (Section 9 (4) (a & c)).
- Intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose (Section 9 (4) (b)).
- Sell water voles or offer or expose for sale or transport for sale (Section 9 (5)).



- Publish or cause to be published any advertisement which conveys the buying or selling of water voles (Section 9 (5)).

## **6.9 Environment Act (Wales) 2016**

- 6.9.1 This act has replaced the section 40 duty in the Natural Environment and Rural Communities Act 2006 (NERC Act 2006), in relation to Wales, and applies to those authorities that fell within the previous duty. It came into force in May 2016.
- 6.9.2 Section 6 of the Act places a duty on public authorities to ‘seek to maintain and enhance biodiversity’ so far as it is consistent with the proper exercise of those functions. In so doing, public authorities must also seek to ‘promote the resilience of ecosystems’. Under Section 6 public authorities will be required to report on the actions they are taking to improve biodiversity and promote ecosystem resilience.
- 6.9.3 Section 7 of the Act places a duty on public authorities to take steps to maintain and enhance biodiversity. This section replaces the duty in section 42 of the NERC Act 2006. The Section 7 Priority Species under this act is a list of the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. The Section 7 Priority Habitats is a list of the habitats of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales.

## 7. REFERENCES

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- British Standard (2005) *Trees in relation to construction – recommendations BS 5837:2005*
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- Welsh Assembly Government (WAG 2016). *Environment (Wales) Act 2016 Section 7 – list of the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales*. Welsh Government, Cardiff.

## 8. I&G Ecological Consulting Legal Disclaimer

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We confirm that in preparing this Report we have exercised reasonable skill and care, taking into account the project objectives, the agreed scope of the work and prevailing site conditions.

Advice in this report is based on the judgement of I&G Ecological Consulting and the interpretation of data gathered during the course of their survey on the property named in this document.

The findings and advice given during the course of this survey is provided by employees of I&G Ecological Consulting acting only on behalf of I&G Ecological Consulting.

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## 9. Plant Species

Grassland Species	
Bird's-foot Trefoil	<i>Lotus corniculatus</i>
Bramble	<i>Rubus fruticosus</i> agg.
Broad-leaved Dock	<i>Rumex obtusifolius</i>
Broad-leaved Willow-herb	<i>Epilobium montanum</i>
Cleavers	<i>Galium aparine</i>
Cocksfoot	<i>Dactylus conglomerata</i>
Common Fleabane	<i>Pulicaria dysenterica</i>
Common Knapweed	<i>Centauria nigra</i>
Common mouse ear	<i>Cerastium fontanum</i>
Common ragwort	<i>Senecio jacobaea</i>
Creeping buttercup	<i>Ranunculus repens</i>
Creeping thistle	<i>Cirsium arvense</i>
Dandelion	<i>Taraxacum officinale</i>
Greater Bird's-foot Trefoil	<i>Lotus pedunculatus</i>
Greater Plantain	<i>Plantago major</i>
Herb Robert	<i>Geranium robertianum</i>
Hogweed	<i>Heracleum sphondylium</i>
Lesser trefoil	<i>Trifolium dubium</i>
Meadow buttercup	<i>Ranunculus acris</i>
Meadowsweet	<i>Filipendula ulmaria</i>
Nettle	<i>Urtica dioica</i>
Ox-eye Daisy	<i>Leucanthemum vulgare</i>
Pendulous sedge	<i>Carex pendula</i>
Pignut	<i>Conopodium majus</i>
Prickly Sow Thistle	<i>Sonchus asper</i>
Redshank	<i>Persicaria maculosa</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rosebay willow-herb	<i>Chamerion angustifolium</i>
Sharp-flowered rush	<i>Juncus acutiflorus</i>
Smooth meadow grass	<i>Poa pratensis</i>
Smooth Sow Thistle	<i>Sonchus oleraceus</i>
Soft rush	<i>Juncus effusus</i>
Spear thistle	<i>Cirsium vulgare</i>
Square-stemmed St. John's Wort	<i>Hypericum ptetraterum</i>
Water Mint	<i>Mentha aquatica</i>
White clover	<i>Trifolium repens</i>
Wild Angelica	<i>Angelica sylvestris</i>
Yorkshire fog	<i>Holcus lanatus</i>

Tree Species	
Alder	<i>Alnus glutinosa</i>
Ash	<i>Fraxinus excelsior</i>
Hazel	<i>Corylus avellana</i>
Holly	<i>Ilex aquifolium</i>
Sycamore	<i>Acer pseudoplatanus</i>
Willow spp.	<i>Salix spp.</i>

## 10. WWBIC Data Search

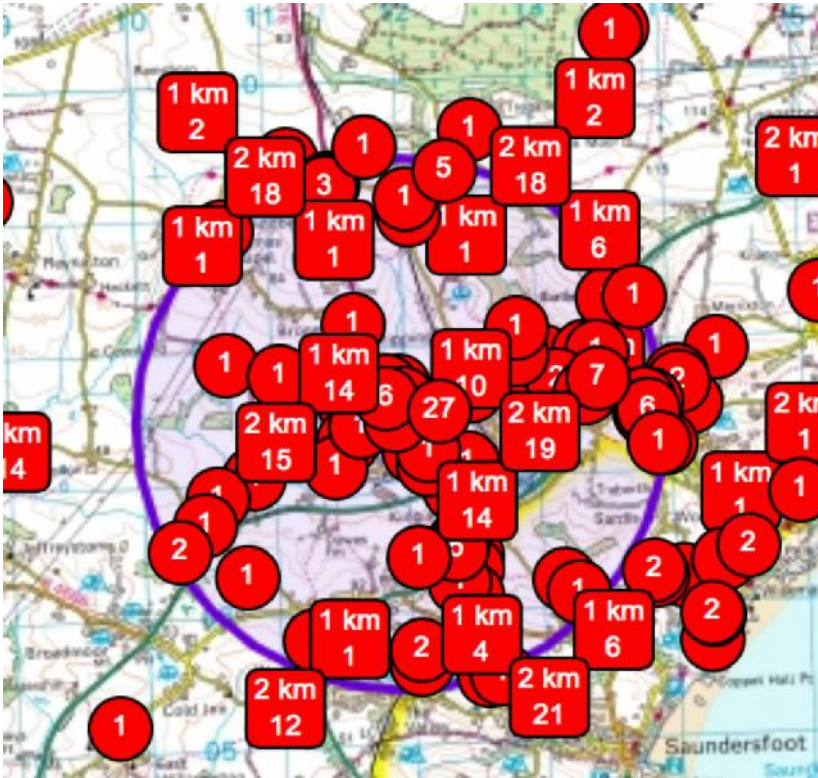


Figure 15: WWBIC Priority Species Data Search 23 July 2018



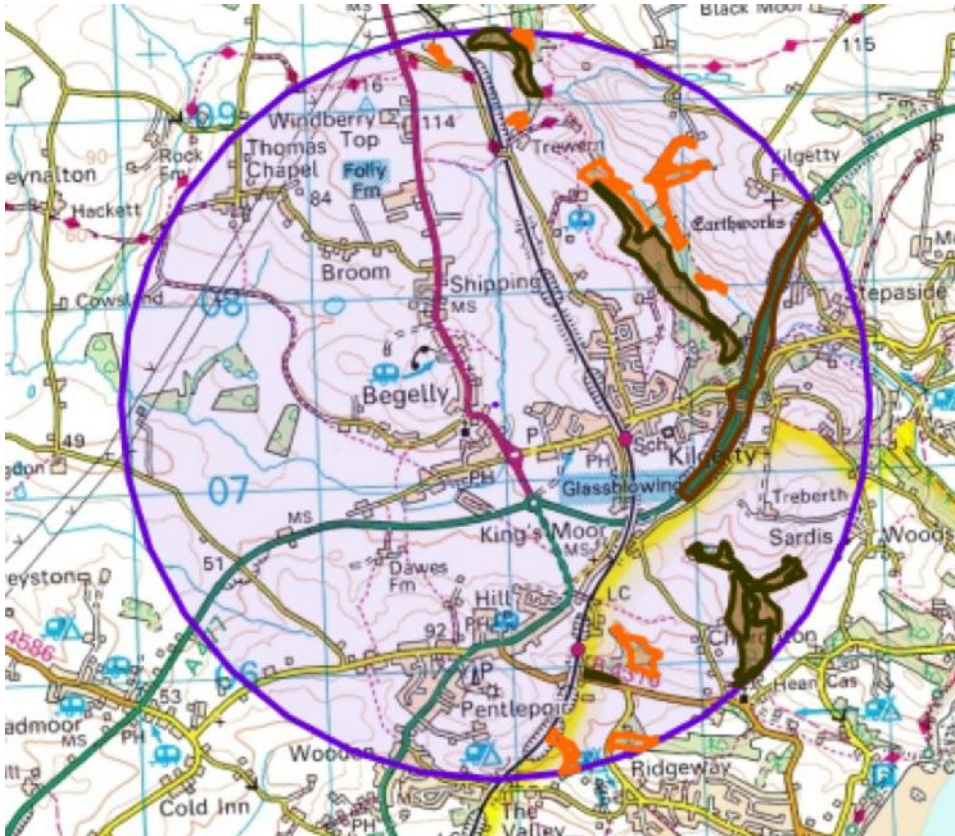


Figure 16: WWBIC Protected Sites Data Search 23<sup>rd</sup> July 2018



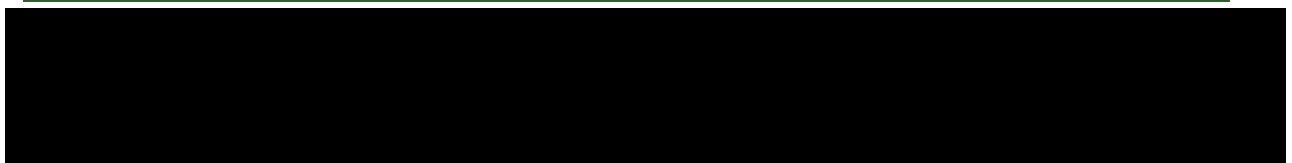
**CANDIDATE SITE SUPPORTING STATEMENT**  
**FOR**  
**REVISED PEMBROKESHIRE LOCAL DEVELOPMENT PLAN**  
**2018-2033**

**LAND OFF PARK GARDENS, BEGELLY, PEMBROKESHIRE**

On behalf of  
Mr D Thompstone

Our Ref: 0500.b  
Date: July 2018  
Prepared by: JDE

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<b>1.0</b>	<b>INTRODUCTION .....</b>	<b>3</b>
<b>2.0</b>	<b>SITE CONTEXT .....</b>	<b>4</b>
2.1	THE SITE .....	4
2.2	THE ADJOINING SETTLEMENT .....	6
<b>3.0</b>	<b>THE PROPOSAL .....</b>	<b>9</b>
3.1	DEVELOPMENT OVERVIEW .....	9
3.2	INFRASTRUCTURE CONSIDERATIONS .....	10
<b>4.0</b>	<b>ENVIRONMENTAL CONSIDERATIONS .....</b>	<b>12</b>
4.1	ECOLOGICAL ATTRIBUTES .....	12
4.2	HISTORICAL ASSETS .....	13
4.3	ENVIRONMENTAL CONSTRAINTS .....	13
<b>5.0</b>	<b>VIABILITY .....</b>	<b>14</b>
5.1	VIABILITY APPRAISAL .....	14
5.2	DELIVERABILITY .....	16
<b>6.0</b>	<b>NATIONAL PLANNING POLICY CONSIDERATIONS .....</b>	<b>17</b>
<b>7.0</b>	<b>CONCLUSION .....</b>	<b>19</b>

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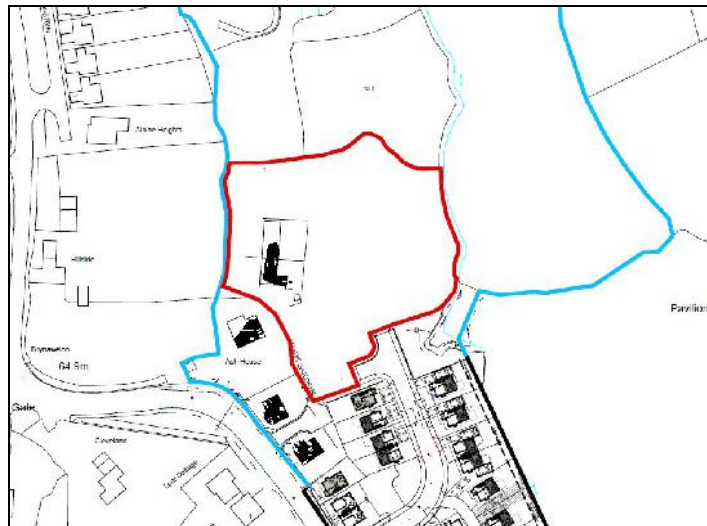
## 1.0 INTRODUCTION

- 1.1 JCR Planning has been instructed by Mr D Thompstone (the Land Owner) to prepare and submit a Candidate Site Supporting Statement for the allocation of land off Park Gardens, Begelly for the purposes of residential development in the forthcoming replacement Pembrokeshire Local Development Plan.
- 1.2 This Statement has been prepared in line with the Authority's published documents entitled *Guidance Note for completing the Candidate Site Submission Form*. The contents of this Statement therefore address each point raised within these documents, as well as ensuring that it complies with regards to the guidance and requirements of *Planning Policy Wales (Edition 9)* when it comes to the preparation of development plans and the allocation of land for residential purposes as part of them.
- 1.3 The contents of this Statement therefore provide a comprehensive case for the allocation of the land for residential development purposes and it should also be read in conjunction with the accompanying supporting information and indicative site layout drawing.

## 2.0 SITE CONTEXT

### 2.1 THE SITE

- 2.1.1 The Candidate Site relates to an area of land that formed part of a former nursery with associated tea rooms, measuring 0.6ha in area and edged red on Plan A below.



**Plan A**

- 2.1.2 The land is currently being temporarily used for the purposes of a soil storage area associated with a nearly completed development directly to the south of the Candidate Site (Photograph 1).



**Photograph 1**

**2.1.3** As a result, the Site has a currently ‘developed’ appearance, although its northern and eastern boundaries are clearly defined by established hedgerows and tree lines. Its western boundary then adjoins existing residential development (Photograph 2), whilst its southern boundary then leads on to the aforementioned under-construction development (Photograph 3).



**Photograph 2**



**Photograph 3**

**2.1.4** Access to the Site is then currently gained via the estate road of the adjoining development site, which in turn then leads on to the A478 to the west of the Site, as well then as via a small groups of residential properties know as Park Gardens at the Site’s south western corner.

**2.1.5** Under the provisions of the current Pembrokeshire Local Development Plan, the site (edged in black) adjoins the Development Limits (edged in red) for the settlement of Begelly, as illustrated in the plan below.





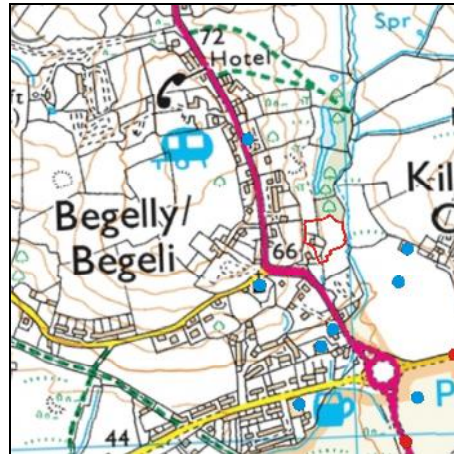
**Plan B**

2.1.6 As can be seen, the Candidate Site has a close association in the immediate sense with the existing form of the settlement to its south and west, including an adjoining housing development. As a result of a combination of these factors, the Site therefore represents a logical opportunity for the expansion of the urban form at this location.

## **2.2 THE ADJOINING SETTLEMENT**

2.2.1 As detailed above, the Candidate Site adjoins the existing settlement and form of Begelly. As a result, the Site is within walking distance of a number of its wide range of community facilities and local services, marked by the blue circles on the map below, as well as those found in nearby Kilgetty.





**Plan C**

2.2.2 From an accessibility perspective, Begelly has access to a number of very well served bus stop (circled red on Plan C). The bus services serving the settlement are numbers 351, 352, 361, 381 and X49, which provide regular access to the following larger settlements, as well as the intervening villages:

- Tenby
- Haverfordwest
- Narberth

2.2.3 The strong sustainable position of Begelly should therefore be given full consideration when considering potential future growth options.

2.2.4 In terms of planned growth for the settlement of Begelly under the provisions of the current LDP, the settlement includes one housing allocation (HSG/003/00024) – North of New Road, Begelly. The land is allocated for 65 units, but despite being allocated under the provisions of the current and previous development plan, as well as being the subject of a number of planning consents, the allocation has failed to deliver any new homes for the community.

2.2.5 The net result of the above is that despite Begelly continuing to have a very strong provision of community facilities, local services and public transport connections, its

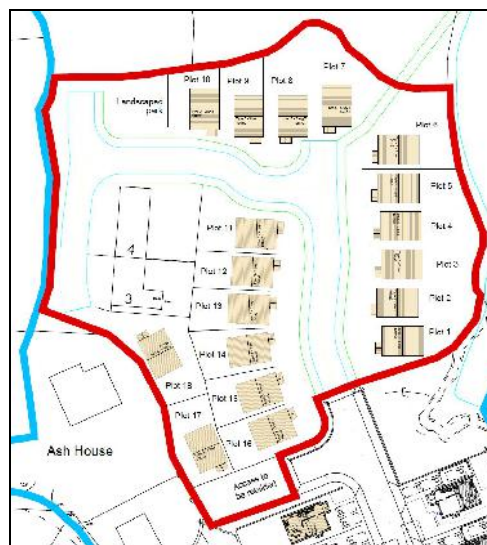
ability to grow and capitalise on these sustainable attributes has been prevented through an allocation that has made no contribution to the housing stock since the LDP adoption. The deliverability of this longstanding allocation is clearly in doubt and so in order to redress this deficit in provision, and capitalise on the sustainability of the settlement, more deliverable residential allocations are required.

## 3.0 THE PROPOSAL

3.0.1 As part of the requirements for the promotion of sites for residential development, this Statement is accompanied by an indicative layout for a potential residential scheme that could be developed on the site. It should be emphasised that the accompanying layout is for illustrative purposes and that other design solutions for the site could also be reached. Notwithstanding this, the accompanying layout drawing has taken account of all the potential assets and constraints of the site and demonstrates that it is capable of delivering 18 units in a deliverable and sustainable manner. The following information therefore expands on this principle.

### 3.1 DEVELOPMENT OVERVIEW

3.1.1 It is proposed that the Candidate Site be allocated in the forthcoming replacement LDP for the purposes of 18 residential units. As detailed above, the accompanying illustrative layout (reproduced below) demonstrates that the site is capable of accommodating this number in a deliverable and sustainable manner, taking into account its setting and topography.



Plan D

- 3.1.2 As illustrated above, the Site is capable of accommodating a mix of unit sizes, but taking into account the existing form of development adjoining and surrounding the Site, it is suggested that two storey dwellings would be the most appropriate form of unit at this location. The associated density – 18 units – has therefore taken into consideration these design parameters.
- 3.1.3 With regards then to access, it is proposed that the Candidate Site would gain access directly off the public highway running along the western edge of the Site, both in terms of any new estate road or private individual drives. The point of access onto the public highway for the proposed estate road has been chosen by taking into account the Site's existing topography and the level of visibility afforded by this section of the public highway. It should be also noted, that were the adjoining land to continue to be allocated for the purposes of residential development, an acceptable access that met with the LHA requirements could be provided as part of the development of the Candidate Site.
- 3.1.4 Due to the proximity of existing facilities and the Site's scale, the proposal does not include any formal areas of open space. However, it is recognised and supported that an element of the proposal would be expected to contribute towards the provision of affordable housing within the local area, which on the basis of the scale of the development, it is envisaged would be done by means of up to 10% of units on-site.

## **3.2 INFRASTRUCTURE CONSIDERATIONS**

- 3.2.1 Any development of the Candidate Site for residential units would be served by mains water and electricity, connections to which lie within the adjoining stretch of public highway. We understand then that foul water would be dealt with by means of a connection to the public sewer system.
- 3.2.2 With regards to surface water, neither the Candidate Site or adjoining land show evidence of poor drainage conditions (e.g. water settlement etc.). As a result, it is

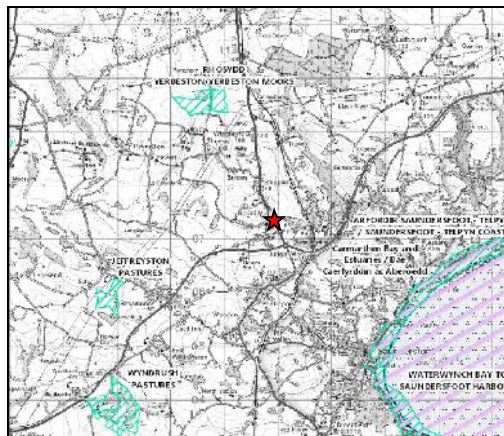
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considered that there would be no obstruction to any development of the site in terms of the disposal of surface water.

## 4.0 ENVIRONMENTAL CONSIDERATIONS

### 4.1 ECOLOGICAL ATTRIBUTES

- 4.1.1 The Candidate Site, as illustrated in previous photographs, is largely used for temporary storage of material associated with the ground works phase of the construction of the development to its South. Notwithstanding this, an Ecological Appraisal has been undertaken of the Site and a copy of the associated report accompanies this Statement. As can be seen, providing that certain mitigation and management measures are adopted through the development of the Site, the proposal will not therefore have any detriment on any local ecological interests.
- 4.1.2 In the wider context, the site does not adjoin or form part of any local or national nature conservation designation. There are then 3 SSSI designations and 1 SAC within 3km of the Candidate Site (red star on Plan E), who's locations are illustrated on the plan below.



**Plan E**

- 4.1.3 However, as can be seen from above, the designations are significantly distant from the site, which will ensure that its development would have no detrimental impact on them.



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## **4.2 HISTORICAL ASSETS**

- 4.2.1 Begelly contains three Listed Buildings with the nearest to the Candidate Site being the Church of St. Mary, some 200m to its west. However, because of intervening topography and existing development, it is not considered that the development of the Candidate Site for residential purposes will have any impact on the character or setting of this or any other Listed Building within the settlement.
- 4.2.2 In addition to the above, there are also no Scheduled Ancient Monuments (SAM) within or adjoining the Candidate Site.

## **4.3 ENVIRONMENTAL CONSTRAINTS**

- 4.3.1 The Candidate Site has been considered against the provisions of the Development Advice Map of *Technical Advice Note 15: Development and Flood Risk* and the data held by NRW with regards to flood risk, as well as the experience of developing the land to the south of the Candidate Site. Although a small portion of the site is classified as being within an area of flood risk, as the accompanying indicative layout drawing shows, sufficient area remains within the Candidate Site to deliver 18 units that would not be at risk of flooding.
- 4.3.2 Due to its greenfield nature and historic agricultural use, the Candidate Site has no ground contamination related constraints. In addition, in the absence of any historical mining in the area, the site has no ground stability related constraints.

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## 5.0 VIABILITY

- 5.0.1 As part of the preparation of any development plan, it is vital to ensure that allocations within it are both viable and deliverable. To not make efforts to explore both these aspects is to then risk that the Plan may be unsound and so in turn fail to meet its own targets or objectives.
- 5.0.2 Although detailed viability appraisals are difficult to prepare at this stage of the Plan's preparation due to the absence of, for example, such things as full engineering details, it is possible to undertake such appraisals at a strategic or in-principle level. The following therefore represents such a process and is fit-for-purpose in providing confidence with regards to both the viability and deliverability of the Candidate Site at this stage, but it should be noted, that more detailed analysis at a planning application stage may result in some variance.

### 5.1 VIABILITY APPRAISAL

- 5.1.1 The following provides an indication of the viability of delivering the proposed 18 units on the Candidate Site in question. It is based very much on its greenfield status and uses figures and costings previously accepted by the local authority through its determination of planning applications and other works. The following appraisal is therefore based on the assumptions set out below in order to provide a residual value for the scheme, prior to ascertaining an indicative land value.

#### Costs

- Dwelling construction costs are based on £1000 per metre.
- Adoptable road construction cost based on £1200 per metre
- Private shred drive construction cost based on £400 per metre
- Connections for all utilities include water, foul water and electric.
- Developer's Profit based on RICS guidelines (15%)

- Professional Fees include planning application fee, associated professional fees, estate agency fees (1%) and LABC Warranty fee.

### **Sales**

- Sale Prices based on LPAs Affordable Housing SPG, market research and ACG figures where relevant.

5.1.2 Using the above, the following represents a strategic viability appraisal for the proposed 18 units, with 10% being made available on an affordable basis (based on 2 three bed units).

Costs	Cost Per Unit/Metre	No. Units/Metres	Total
Detached 3 Bed	104000	18	1872000
Road Construction	1200	120	144000
Shared Access Drives	400	35	14000
Utility Connections	5000	18	90000
Professional Fees	-	-	86328.7
Education Contributions	2720	18	48960
Public Open Space Contributions	468.56	18	8434.08
Community Facilities Contributions	187	18	3366
Sprinklers	3500	18	63000
Total			2330088.78
Sales			
Detached 3 Bed	215000	16	3440000
Detached 3 Bed (Affordable)	94435	2	188870
Total			3628870
Developers Profit	Total		544330.5
Residual Land Value			754450.72

**Table 2**

5.1.3 Based on the above figures, it is considered that in-principle, the development of the site would be financially viable and also capable of making a contribution towards the provision of affordable housing within the locality.

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## **5.2 DELIVERABILITY**

- 5.2.1 In terms of deliverability, it should be firstly noted, as illustrated above, that the site is viable. Furthermore, there are no ownership or physical constraints preventing the site's delivery.
- 5.2.2 In terms of a delivery timescale, with a developer secured, it is envisaged that the site could be capable of being completed within 5 years from the adoption of the replacement LDP.

## 6.0 NATIONAL PLANNING POLICY CONSIDERATIONS

6.1.1 In the preparation of any development plan, consideration must be given to national planning policy and guidance. At present, this takes the form of *Planning Policy Wales (Edition 9)* and a series of *Technical Advice Notes (TAN)* that deal with a range of topic areas.

6.1.2 With regards to residential development, or housing, the overarching requirements and principle guidance set by national policy can be found at Paragraph 9.2.3, which reads as follows:

*“Local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing judged against the general objectives and the scale and location of development provided for in the development plan. This means that sites must be free, or readily freed, from planning, physical and ownership constraints, and economically feasible for development, so as to create and support sustainable communities where people want to live. There must be sufficient sites suitable for the full range of housing types.”*

6.1.3 At present, Carmarthenshire County Council's housing supply figure is below the required 5 year level and so it is imperative that this is addressed as quickly as possible to avoid further deterioration of communities and the facilities and services they have to offer. The instigation of the review of the LDP will form part of addressing this issue, but only if truly sustainable and deliverable allocations are identified and allocated, to replace many of the failing sites that currently form part of the Authority housing and growth strategy for the County, as set out by the current LDP.

6.1.4 Dealing specifically with the Candidate Site subject of this report, it is evident that its inclusion within the replacement LDP would adhere to the requirements of Paragraph

9.2.3, in that it is free from any planning, physical or ownership constraint. In addition, as shown at Section 5 of this Statement, the site is also economically viable in deliverability terms.

6.1.5 Paragraph 9.2.9 then provides Authorities with more specific guidance in selecting sites for allocation for residential development and in terms of the Candidate Site, it is considered that it satisfies all relevant criteria, including the following:

- The location of the Candidate Site is sustainable in terms of its proximity to a range of community facilities, local services and public transport services.
- The physical and social infrastructure of the settlement is capable of accommodating the proposed development without detriment to any interest.
- The development of the Candidate Site for the scale of development proposed is not subject to any physical constraint such as flood risk, ground instability, ecological interest, historic assets or contamination that would prevent its delivery.
- The development of the site for residential purposes would be compatible with existing adjoining land uses.

6.1.6 In summary therefore, the allocation of the Candidate Site adheres and supports the objective, principles and requirements of national planning policy.



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## 7.0 CONCLUSION

- 7.1.1 Although currently undeveloped, the Candidate Site forms a logical extension to the existing settlement, being adjoined by its existing built form on two sides and by a community facility strongly related to a third. The Site also represents the natural phased progression of an existing and very successfully development scheme to its south. This development has seen its near completion in a short period of time, demonstrating both its viability and deliverability, as well as being capable of securing community benefits in the form of financial contributions and on-site affordable housing units.
- 7.1.2 In addition to the above, the Site lies within close proximity and walking distance of the existing community services and local facilities of the adjoining settlement, which will ensure it makes a positive contribution to both national and local sustainable development objectives.
- 7.1.3 From a wider sense, the Site will also benefit from well served excellent public transport links to the nearby settlements, the larger towns of Tenby, Haverfordwest and Narberth, together with other locations within and adjoining the County, further increasing the facilities and services available to future residents of the Site via sustainable transport means.
- 7.1.4 In tandem to this, the development of the Site will in turn ensure a continued deliverable source of future housing for the settlement in which it lies and forms a core of, which has seen a dangerous level of under supply prior to and since the adoption of the current LDP. The development of the Site will help to redress this imbalance and it is strongly suggested that the Authority closely scrutinises those sites currently allocated in the LDP in terms of their suitability and deliverability if it is to continue to allocate them. National planning policy however would suggest that in view of the uncertainty in relation to their delivery, such sites should not form part of the replacement LDP.

7.1.5 With the Candidate Site having no access, ground condition, flood risk, hydrological, ecological, archaeological or land ownership related constraints, its delivery if allocated is assured. Combined therefore with its locational characteristics, the Site in question represents a sustainable candidate for future housing development.

7.1.6 In view of the above and information provided in this Statement, it is respectfully requested that the Candidate Site in question be designated for residential development.