

## Emma Evans

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**From:** No Reply - Pembrokeshire County Council  
**Sent:** 11 December 2024 12:51  
**To:** LDP - For Enquiries  
**Subject:** LDP consultation

**Follow Up Flag:** Follow up  
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**Categories:** D Rep



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# Pembrokeshire County Council Local Development Plan 2 Deposit 2

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DATE 11/12/2024  
TIME 12:50:31 PM

Question

Answer

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**Name:** Mrs Annabel Trollope-Bellew

**Job Title:**

**Organisation:** Carew Castle Estate

**Address:**

**Telephone Number:**

Question

Answer

Name:

Kathryn Perkins

Job Title:

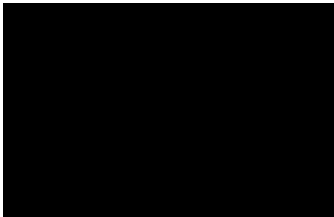
Land agent

Organisation:

Edward H Perkins

Address:

Telephone Number:



Main Contact Email Address:

Date:

11/12/2024

Your name / organisation:

Carew Castle Estate

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.:

I think the LDP is unsound and should be changed

Which part of the Plan (or supporting documents) are you commenting on? Please tick all that apply or use the text box to specify:

LDP 2 Deposit 2 proposal map

Other (Please specify):

Policies:

References:

Selected Features:

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

New site allocation

Site reference (if known)::

Name::

Mrs Annabel Trollope-Bellew

Location::

Land on part of the former Carew Airfield

Justification on inclusion of alternative site allocation, policy or paragraph:

The site lies to the south of the existing adopted Local Development Plan employment land allocation - EMP/000/01. It occupies 11.35 hectares of land directly to the south-west of the intersection between the two main runway areas. Although it includes undeveloped land, it also includes former airfield land, together with existing uses which include scrap metal premises and breeze block and aggregate manufactures/distributors. There is therefore an existing employment use of the land, with infrastructure and roadways in place. The site is situated close to the A477 truck road providing excellent transport links.

Are you submitting additional material to support your representation?:

Yes

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

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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 ).:

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

#### NOTES

This form was created on a computer and is valid without the signature and seal.



**Ffurflen Sylwadau Cam Adneuo'r  
Cynllun Datblygu Lleol****Deposit LDP Representations Form**

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>.

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 16:30pm 11 Mawrth 2020.** 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>

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 16:30pm 11 March 2020.** 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 Anthony Trollope Bellew	Keith Warren
Teitl swydd (lle y bo'n berthnasol) Job title (where relevant)		Associate Director
Sefydliad (lle y bo'n berthnasol) Organisation (where relevant)	C/O Edward H Perkins, Rural Chartered Surveyors.	Asbri Planning Limited
Cyfeiriad Address		
Rhif ffôn Telephone no		
E-bost Email address		

**Ffurflen Sylwadau Cam Adneuo'r  
Cynllun Datblygu Lleol****Deposit LDP Representations Form**

Llofnodwyd (gallwch teipio) Signed (can be typed)	
Dyddiad Date	18th March 2020
<b>RHAN B: Eich sylw</b> <b>PART B: Your representation</b>	
Eich enw / sefydliad Your name / organisation	Keith Warren (Asbri Planning Limited)
<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)	GN46
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.	√

Ffurflen Sylwadau Cam Adneuo'r  
Cynllun Datblygu Lleol

## Deposit LDP Representations Form

*Rwy'n credu na chafodd y gofynion gweithdrefnol eu bodloni.*

I think that the procedural requirements have not been met.

**3. A hoffech i'r Cynllun gynnwys polisi, dyraniad safle neu paragraff newydd?**

*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

Land on part of the former Carew Airfield

*Cyfeiriad y cais*

Site reference

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*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.

**Ffurflen Sylwadau Cam Adneuo'r  
Cynllun Datblygu Lleol****Deposit LDP Representations Form****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.

Policy GN 46 – Waste Management Facilities is objected to due to the omission of the site as an employment site which is potentially suitable for the provision of new in-building facilities for the handling and treatment of waste.

See Attached Supporting Statement

*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.*

**Ffurflen Sylwadau Cam Adneuo'r  
Cynllun Datblygu Lleol****Deposit LDP Representations Form**

I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector.	
<i>Rwyf am siarad mewn sesiwn gwrandawriad.</i> I want to speak at a public hearing.	√
<p><i>Os ydych chi eisiau cyfranogi mewn gwrandawriad, nodwch isod am beth rydych chi eisiau siarad (e.e. 'Safle Tai ym Mhen y Graig' neu 'Y targed tai cyffredinol').</i></p> <p>If you want to participate in a hearing, indicate below what you want to speak about (e.g. 'Housing site at Pen y Graig' or 'The overall housing target').</p>	
<p><b>9. Os ydych am siarad, byddai'n ddefnyddiol pe gallech nodi ym mha iaith yr hoffech gael eich clywed.</b></p> <p><b>9. If you wish to speak, it would be helpful if you could indicate in which language you would like to be heard.</b></p>	
<i>Rwy'n dymuno cael fy nghlywed yn Gymraeg.</i> I wish to be heard in Welsh.	
<i>Rwy'n dymuno cael fy nghlywed yn Saesneg.</i> I wish to be heard in English.	√



## Nodiadau cyfarwyddyd

### Guidance notes

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

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

1. Ydy'r cynllun yn ffitio? (h.y. a yw'n gyson â chynlluniau eraill?)

2. Ydy'r cynllun yn briodol? (h.y. a yw'n briodol ar gyfer yr ardal yng ngoleuni'r dystiolaeth?)

3. A fydd y cynllun yn cyflawni? h.y. a yw'n debygol o fod yn effeithiol?)

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

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

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

Fydd methu adnabod prawf ddim yn golygu na chaiff eich sylwadau eu hystyried, cyhyd â'i fod yn perthyn i'r Newidiadau Canolbwytiedig. 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.

***Ffurflen Sylwadau Cam Adneuo'r  
Cynllun Datblygu Lleol***

*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.*

**Deposit LDP Representations Form**

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.

Pembrokeshire County  
Council – Local  
Development Plan 2  
(LDP 2) Deposit Plan  
Representations

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**Land on Part of the  
Former Carew Airfield,  
Pembrokeshire**

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March 2020





# Contents

## **Chapter 1**

Introduction

## **Chapter 2**

Site Suitability

## **Chapter 3**

Specific Policy Objections, Sustainability Assessment and Tests of Soundness

## **Chapter 4**

Conclusion

## **Appendix 1**

Site Location Plan

## **Appendix 2**

Preliminary Ecological Report

# 1 Introduction

- 1.1 This Deposit Plan submission document has been prepared in order to accompany the representation forms completed in respect of land at the former Carew Airfield, Pembrokeshire. It is submitted on behalf of Mr Anthony Trollope Bellew via Edward H Perkins, Rural Chartered Surveyors.
- 1.2 The site lies to the south of the existing adopted Local Development Plan employment land allocation – EMP/000/01. It occupies 11.35 hectares of land directly to the south-west of the intersection between the two main runway areas. It includes undeveloped land, former airfield land, together with existing uses which include scrap metal premises and breeze block and aggregate manufactures/distributors . The blue line on the submitted plan in Appendix 1 shows other land in the site promoter's ownership, including the access route which passes the former control tower.
- 1.3 A Candidate Site submission was made in August 2018 which highlighted the merits of the site as offering opportunities for employment uses, and particularly a waste and recycling related facility. It was emphasised that an allocation would also assist in providing certainty in terms of the range of uses acceptable on the site as well as consolidating existing uses.
- 1.3 It is therefore disappointing to note that the whole of the former Carew Airfield site is shown on Proposals Map 21 of the Deposit LDP 2 as being in open countryside with the adjacent employment allocation EMP/000/01 removed. Objections are therefore submitted on this basis that a specific allocation should be made under Policy GN 46 – Waste Management Facilities.
- 1.4 In terms of the content of the Submission Section 2 of this report, with reference to evidence prepared, the Council's LDP 2 Evidence Base, and compatibility with criteria identified in Planning Policy Wales and TAN 21 emphasises the suitability of the site for the uses proposed; Section 3 sets out the objection to Plan Policies and provides an assessment against the Council's SA objectives, and Tests of Soundness; Section 4 provides a summary and conclusions.

## 2 Site Suitability and Need

- 2.1 In the Site Assessment Report 2019, published by the Council to accompany the Deposit Plan documentation, the candidate site is included in the section – ‘Sites Phased Out at Stage 3,4 and 5 Assessment – Key and Statutory Consultees’. It is stated above the schedule that ‘*The following sites were phased out at Stage 3 as constraints to development that were so significant they could not be mitigated were identified by Consultees.*’
- 2.2 In the schedule the main reason for ‘screening out’ is given as ‘Ecology’ with an expanded reason quoted as - ‘*Also ALC Grades 2 and 3 and potential impact on Aquifer due to lack of mains drainage.*’
- 2.3 These are discussed in turn below:

### **Ecology**

- 2.4 A Preliminary Ecological Assessment has been undertaken by Bay Ecology. This is appended to these representations (Appendix 2). The results are summarised as follows:
- 2.5 The field survey undertaken at the site identified a variety of habitats dominated by a large improved grassland field, and large areas of hard standing associated with the former Carew airfield; scrap metal premises and breeze block and aggregate manufactures/distributors. Areas of marginal scrub & tall ruderal area located around site along the boundaries and earth bunds; whilst boundary treelines & standard trees along with running ditches were associated with the southern extent of site. The site is surrounded by agricultural land with the remaining Carew Airfield located to the north east.
- 2.6 In terms of the ecological importance of the site the improved grassland and hard standing is of low intrinsic ecological value and represented the most suitable area of the site to support any future development. However, the marginal scrub and treelines and offsite riparian corridor were considered to be of ecological significance at a local level and it is recommended that such boundary features be retained as dark wildlife corridors. The offsite running watercourse needs to be protected from future construction activities to ensure that future surface water runoff and pollution incidents are prevented or minimised. This would be subject to a future Construction Environmental Management Plan (CEMP)
- 2.7 **It is clear from the above that the area of property which are subject to these representations, particularly the areas covered by the existing operations, are of low intrinsic ecological value. Any ecological reason for ‘screening out’ the site is clearly inappropriate.**

### **Agricultural Land Quality**

- 2.8 A significant proportion of the land in question is covered by concrete surfaces. The grassed area in the central portion of the site is occasionally grazed by sheep and cattle but there is no history of any arable farming.
- 2.9 Proposals would not therefore impact on land in a traditional agricultural use as part of a formal farm holding. Whilst the Predictive Agricultural Land Classification Map shows the wider area as Grade 2, it is emphasised that this is based on a modelled prediction and is not definitive.
- 2.10 **Using this reason for rejecting the proposals is therefore inappropriate.**

### **Impact on Aquifer/ Drainage Considerations**

- 2.11 The current activities operate under an NRW license which requires a sealed drainage system to prevent any leachate to the aquifer. Such measures would continue to apply in any proposed extension to these operations. In terms of mains water, connections exist nearby and should the site be allocated it would provide the certainty for future growth which would allow necessary infrastructure to be put in place.
- 2.12 **The site does not lie in a flood zone and there are rarely any problems with standing water.**

### **Compatibility with National Guidance**

- 2.13 PPW 10 For all wastes, suitable locations for sustainable waste management development should be identified in development plans as well as criteria by which applications for such developments will be determined, recognising that the most appropriate locations will be those with the least adverse impact on the local population and the environment and with the best potential to contribute to a broad infrastructure framework. Collaboration and joint working may be necessary to respond strategically to the requirement identified as part of waste monitoring. Individual authorities should not, however, exclude provision for waste or other potentially polluting projects or prohibit all applications to set them up. They should make realistic provision for certain types of industry or facility that may be detrimental to amenity or conservation interests, or a potential source of pollution. Effective engagement with the waste management industry and local authority waste managers and consortia will be a necessary component of waste planning.
- 2.14 TAN 21: Waste suggests criteria that may influence the type of location of new waste management facilities. In this context it is stated that new sites might be located, if appropriate, within or adjacent to:
- industrial areas, especially those containing heavy or specialised industrial uses;
  - degraded, contaminated or derelict land - well-located, planned, designed and operated waste management facilities may provide good opportunities for remediating and enhancing sites which are damaged or otherwise of poor quality, or bringing derelict or degraded land back into productive use;
  - existing or redundant sites or buildings - which could be used, or adapted, to house materials recycling facilities, or composting operations;
  - sites where the nature of existing and proposed neighbouring land uses facilitate the location of waste management infrastructure and there are opportunities for co-locating waste management/resource recovery/re-processing/re-manufacturing facilities to form environmental technology clusters;
  - site infrastructure (including electricity grid connections for energy from waste facilities) is present;
  - there are existing or proposed transport infrastructure links – including opportunities for integrated multi-modal road, train, canal and sea connections;
  - there is a need for sites for smaller-scale community based re-use and recycling activities;
  - the cumulative effect of waste management facilities and other development on sensitive environmental receptors is acceptable;

- the cumulative effect of waste management facilities and other development on the wellbeing of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential is acceptable.
- 2.15 The previous candidate site submission considered the merits of the site against the above criteria and established that the site concerned, as an extension of an existing waste management facility, would be wholly appropriate in the above context.
- 2.16 The South West Wales Regional Waste Plan 1st Review was published in August 2008 with the aim of assisting the region in developing an integrated and adequate network of waste management facilities by providing strategic information on the types of waste facilities required and the types of locations likely to be acceptable. The RWP 1st Review sought to provide a strategic framework for the preparation of Local Development Plans and will be a material consideration in the development control process.
- 2.17 TAN 12 requires the preparation of Waste Planning Monitoring Reports. The April 2016 Waste Planning Monitoring Report (WPMR) for SW Wales is the most up to date published report for the region.
- 2.18 The WPMR states that, in particular, there is insufficient capacity in SW Wales, in terms of recovery facilities, for residual waste streams. As such targets to meet the 2025 goal of achieving zero landfill are in danger of being compromised.
- 2.19 The accepted definition of residual waste is 'Non-hazardous waste material that cannot be re-used or recycled and needs to be sent to energy recovery or disposal'.
- 2.20 The WPMR also expresses concerns regarding the remaining landfill capacity in the region (10.7 years in 2016). Whilst this is below the threshold which would require a new landfill site, the capacities are based on a number of assumptions, including new residual waste treatment facilities becoming available. The document states that since 2016 some of the overseas offloading arrangements for residual waste have now been discontinued, including those relating to Pembrokeshire's residual waste.

### **Future Intentions**

- 2.21 A major contributor to residual waste streams is waste wood. The current operator of the site concerned wishes to expand activities to accommodate this source of non hazardous waste material. The development of a suitable bulking plant would enable the separation and processing of a number of inert waste streams, including plastics wastes.
- 2.22 In addition the current activities involving scrap metal recovery represents an important waste management activity which is often resisted as being inappropriate on conventional employment sites. Associated activities however, result in a major reduction of new steel and aluminium production with associated reduction of energy and resources.
- 2.23 It can be concluded that the identification of an existing waste management site with potential to expand to process residual and other waste streams, meets the criteria in PPW, TAN 21, and the need established by the Regional Waste Plan Monitoring Report, and indeed, the Council's own Waste Topic Paper. The reasons cited in the Council's Candidate Site Assessment for rejecting the site as a waste management related allocation, which refer to Ecological, Drainage and Agricultural Land, are clearly inappropriate.**

### 3 Policy Objections

- 3.1 Policy GN 46 – Waste Management Facilities is objected to due to the omission of the site as an employment site which is potentially suitable for the provision of new in-building facilities for the handling and treatment of waste.
- 3.2 The Policy sets out criteria for the consideration of appropriate facilities. As established in the previous sections, the site meets these in terms of:
- **It is an existing waste management site**
  - **It is the type of site which is indicated as being appropriate under the provisions of TAN 21;**
  - **It is easily accessed from A and B Class roads;**
  - **There is an identified need for the facility;**
  - **It can potentially be co-located with energy and complementary uses on other parts of the former airfield site**
- 3.3 As such the site is suitable as a waste management site, and indeed is already used for waste processing activities, while those listed are only stated as 'potentially suitable'.
- 3.4 An assessment under the Council's Sustainability Appraisal objectives is set out below.

SA Objective	Self Assessment
1. Develop and maintain a balanced population structure	Provision of appropriate waste recycling facilities can have positive effects on the population structure,
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	The site lies in an appropriate location to minimise impact on human health.
3. Improve education opportunities to enhance the skills and knowledge base	Not applicable
4. Minimise the need to travel and encourage sustainable modes of transport	The development site is accessible by a variety of means of transport.
5. Provide a range of high quality housing including affordable housing to meet local needs	Not applicable

6. Build safe, vibrant and cohesive communities which have improved access to key services and facilities	The site has distinct advantages in this respect as there is direct access to the strategic road network without the need to transport materials via a residential area. Furthermore sufficient distances exist between the site and local residential properties.
7. Protect and enhance the role of the Welsh language and culture	Not applicable.
8. Provide a range of good quality employment opportunities accessible to all sections of the population	Employment opportunities will be created in association with the allocation of the site. Locational guidance in TAN 21: Waste favours industrial areas, especially those containing heavy or specialised industrial uses and makes reference to the suitability of degraded, contaminated or derelict land. It has been accepted by Pembrokeshire Council that the airfield site constitutes brownfield land, and it is clear that there are pockets of dereliction. It is therefore submitted that the site should be included as an allocation for uses which would include B2 uses, in order to meet targets for <i>'well-located, planned, designed and operated waste management facilities which may provide good opportunities for remediating and enhancing sites which are damaged or otherwise of poor quality, or bringing derelict or degraded land back into productive use'</i> as advocated in TAN 21.
9. Support a sustainable and diverse local economy	The waste sector represents a growing source of job opportunities.
10. Prepare for and reduce the impact of Pembrokeshire's contribution to climate change	Recycling of sources of waste, including future proposals for the processing of plastic waste will certainly meet wider environmental and climate change objectives.
11. Maintain and improve air quality	The location of the site is unlikely to impact on air quality, and it is distanced from residential areas.
12. Minimise the generation of waste and pollution	The County operates a strong recycling policy and the proposal will form a major contribution to this objective.

13. Encourage the efficient production, use, re-use and recycling of resources	The allocation of the site for a range of waste recycling activities will be compatible with the provisions of TAN 21, which refers to ' <i>sites where the nature of existing and proposed neighbouring land uses facilitates the location of waste management infrastructure and there are opportunities for co-locating waste management/resource recovery/reprocessing/re-manufacturing facilities to form environmental technology clusters</i> '. Clearly the site would meet these requirements. It is likely to be difficult to identify similar sites which match the criteria. As such the Revised Plan should build on the opportunity to meet the specific market demand.
14. Maintain and protect the quality of inland and coastal water	All proposals will need to ensure that there are no adverse impacts on water quality and ground water quality.
15. Reduce the impacts of flooding and sea level rises	The site is not at risk of flooding
16. Use land efficiently and minimise contamination	The current activities operate under an NRW license which requires a sealed drainage system to prevent any leachate to the aquifer.
17. Safeguard soil quality and quantity	The site contains an isolated area of improved grassland which has been used for occasional grazing. The retention of the land for agriculture is not justified in this context.
18. Maintain, enhance and value biodiversity and promote the resilience of ecosystems	A Preliminary Ecological Assessment has been undertaken by Bay Ecology. In terms of the ecological importance of the site the improved grassland and hard standing is of low intrinsic ecological value and represented the most suitable area of the site to support any future development. Mitigation measures to safeguard features of local ecological interest are highlighted.
19. Protect and enhance the landscape and geological heritage	The former airfield use has limited landscape interest. Well planned in-house waste provision with landscaping and screening measures can seek to minimise wider landscape impact. The site therefore requires an allocation to provide certainty as to what environmental impact measures will be required.
20. Encourage quality locally distinct design that complements the built heritage	Not applicable.
21. Protect, enhance and value the built heritage and historic environment	Any adverse impact on built heritage or historic environment is unlikely.



## Tests of Soundness

- 3.5 With reference to the merits of the site as discussed in the previous section, it is evident that the omission of the land results in questions of the soundness of the overall Plan. The three tests of Soundness are discussed below in the context of the site and the proposals involved.

### Does the Plan Fit? (i.e. is it consistent with other plans?)

- 3.6 As a result of the points raised in previous sections of this submission it is considered that the Plan is inconsistent with the Provisions of National Guidance as embodied in TAN 21 and the South West Wales Regional Waste Plan, in particular the Waste Planning Monitoring Report, where in terms of residual waste streams the following points are cited as being particularly important:
- 3.7 For residual waste, there is insufficient capacity in SW Wales, in terms of recovery facilities, to reach, or get close to, the 2025 goal of achieving zero landfill. Only two facilities for residual waste treatment have been granted planning consent in SW Wales in recent years and only one of these permissions has been implemented.
- 3.8 There are industry concerns that there is insufficient residual waste product in the SW Wales region to make new residual waste treatment facilities viable. It was recorded that some local authorities in SW Wales were now exporting residual waste to off-loaders outside the UK but within Europe (for use in Energy from Waste facilities), as this has been found to be more cost-effective than sending it to facilities in Wales or England. However, since 2016 some of the overseas offloading arrangements have now been discontinued, including those relating to Pembrokeshire's residual waste.

### Is the Plan appropriate? (i.e. is it appropriate for the area in the light of evidence?)

- 3.9 Evidence submitted demonstrates that the reasons for rejecting the candidate site on ecology, agricultural land quality and drainage grounds are not appropriate

### Will the Plan deliver? (i.e. is it likely to be effective?)

- 3.10 **Given the above, it is doubtful that the Plan will deliver on its waste management objectives if suitable provision is not made to accommodate sites for receiving, processing and management of particular waste streams, including metal, plastic and wood. The site in question is ideally placed to deliver the facilities required, which would build on current activities.**

## 4 Conclusion

- 4.1 This LDP2 Deposit Plan representation is made by Asbri Planning Limited on behalf of Mr Anthony Trollope Bellew via Edward H Perkins, Rural Chartered Surveyors. It concerns land at the former Carew Airfield which, notwithstanding a candidate site submission which was acknowledged in the Council's Waste Topic Paper, as the only proposal for a waste related development, has not been identified as an employment land allocation, suited for waste and recycling uses.
- 4.2 Policy GN 46 – Waste Management Facilities is objected to due to the omission of the site as an employment site which is potentially suitable for the provision of new in-building facilities for the handling and treatment of waste. The site would offer an opportunity for an extension of the current employment land allocation at this location to consolidate existing waste and employment activities and which encompasses an area previously described as brownfield land by the local authority.
- 4.3 The site needs to be identified as an employment allocation which is suitable for accommodating proposals for the provision of new in-building facilities for the handling and treatment of waste under Policy GN46. This would assist in providing certainty for future activities, particularly for residual forms of waste streams, where there is a regional need identified in the April 2016 Waste Planning Monitoring Report (WPMR) for SW Wales. Such facilities would reduce the potential need for a new landfill site in the region.
- 4.4 This submission is accompanied by evidence in the form of a Preliminary Ecological Assessment which has established that the areas proposed for future development are of low intrinsic ecological value and represented the most suitable area of the site to support any future development. Mitigation measures to safeguard features of local ecological interest are highlighted.
- 4.5 The submission has assessed the site against established site selection criteria in Planning Policy Wales and TAN 21: Waste. An assessment under the Council's Sustainability Assessment objectives has also been carried out. It is clear that the proposals are compatible with the relevant criteria. In this respect the Plan fails to meet the three prescribed Tests of Soundness.
- 4.6 In light of the above, it is therefore considered that Pembrokeshire County Council should, in subsequent focused changes, identify the land as an employment/waste management/recycling land use allocation under Policy GN46.

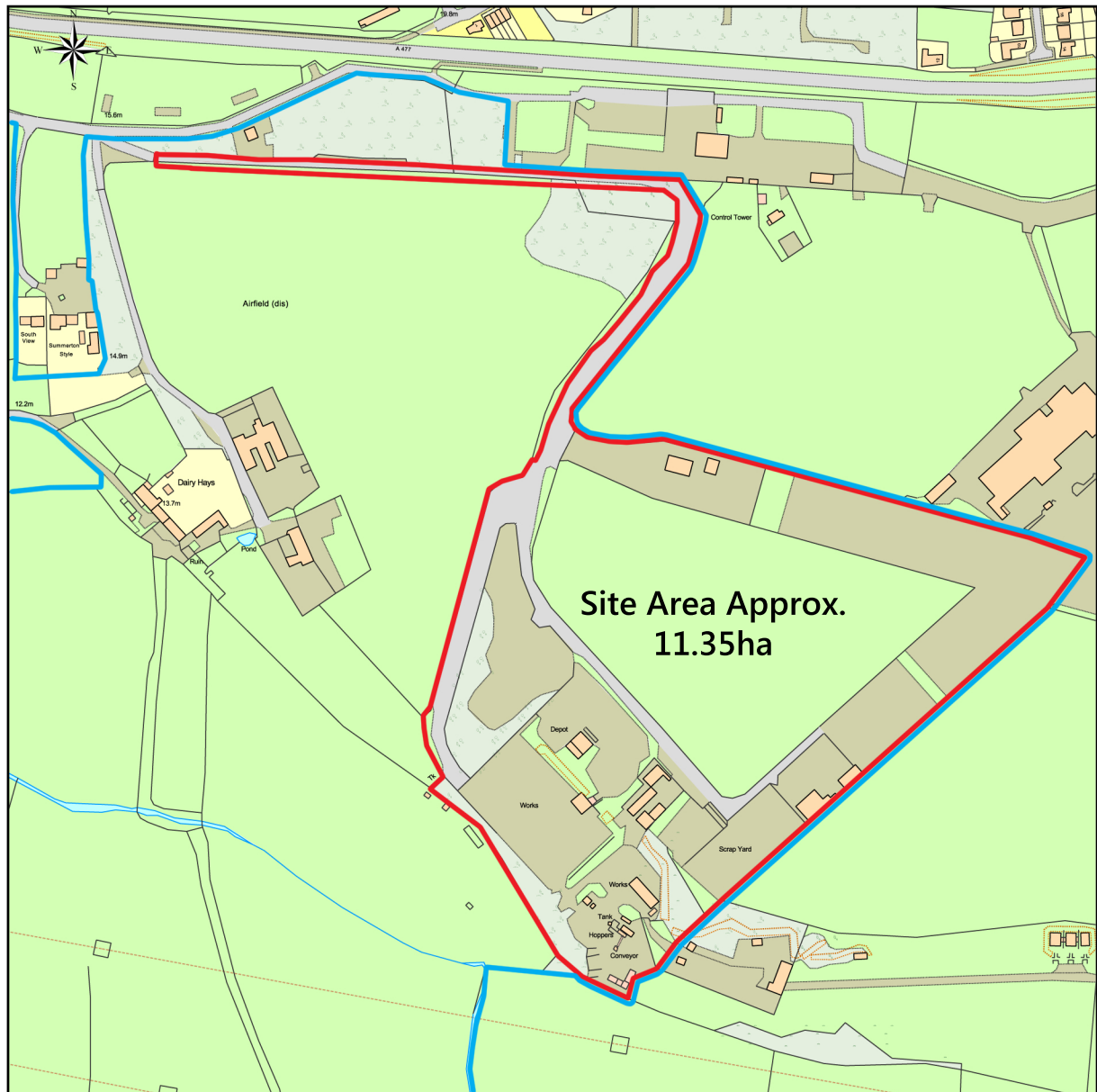
# Appendix 1

## Site Location

## Appendix 2

### **Preliminary Ecological Report**

# Site Location Plan - Former Carew Airfields



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0m 50m 100m 150m 200m 250m 300m 350m 400m

Scale: 1:5000, paper size: A4



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Prepared by: Kate Stevens, 13-08-2018

**LAND AT FORMER CAREW AIRFIELD, PEMBROKESHIRE**

**PRELIMINARY ECOLOGICAL REPORT**

18 March 2020

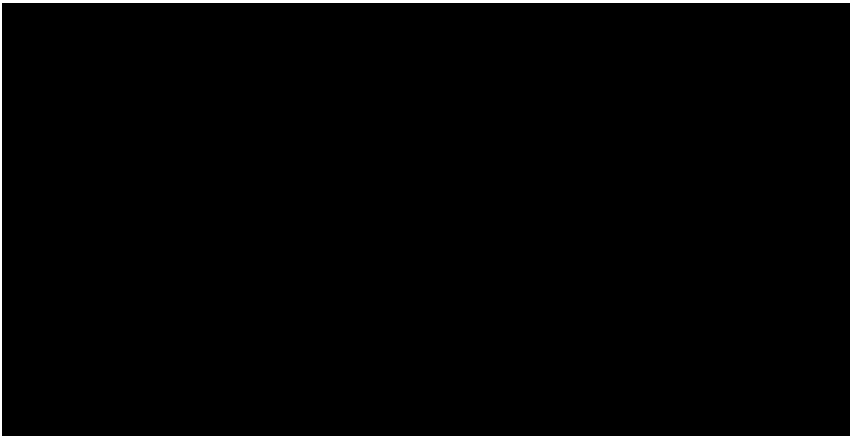




LAND AT FORMER CAREW AIRFIELD, PEMBROKESHIRE

PRELIMINARY ECOLOGICAL REPORT

Document Ref: Doc 01 – 18/03/2020



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Appendix I      Site Location Map

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## SUMMARY

Bay Ecology was commissioned [REDACTED] to undertake an ecological appraisal of a parcel of land located at Carew Airfield, Pembrokeshire. It is my understanding that the site is to be promoted for use as a waste/recycling centre.

Desk based consultation confirmed that the site did not contain any statutory or non-statutory conservation designations. However, the Pembrokeshire Marine Special Areas of Conservation (SAC) and Milford Haven Waterway Sites of Special Scientific Interest (SSSI) were located approximately 0.8km north of site. The application site did have some limited hydrological connectivity to the designations due to the offsite boundary watercourse that ran along the southern boundary of site eventually flowing into the estuary. The Milford Haven Waterway SSSI is designated for, amongst other features, internationally important populations of Greater Horseshoe bats, as well as nationally important numbers of Lesser Horseshoe bats, with the woodland, estuarine and grassland habitats providing essential feeding grounds for the bats, as well as flight paths between sites. The SSSI (bats) was of some relevance to site due to the mobile nature of the bat species that are qualifying features of the designations, potentially utilising the linear habitat (riparian corridor and treelines) and structures onsite (very limited). A single record of Small Heath butterfly *Coenonympha pamphilus* was associated with the northern boundary of site. However, numerous records of protected or notable species were identified within a 1km of the site.

The field survey undertaken at the site identified a variety of habitats dominated by a large improved grassland field, and large areas of hard standing associated with the former Carew airfield; scrap metal premises and breeze block and aggregate manufactures/distributors. Areas of marginal scrub & tall ruderal were located around site along the boundaries and earth bunds; whilst boundary treelines & standard trees along with running ditches were associated with the southern extent of site. The site is surrounded by agricultural land with the remaining Carew Airfield located to the north east.

In terms of the ecological importance of the site the improved grassland and hard standing was of low intrinsic ecological value and represented the most suitable area of the site to support any future development. However, the marginal scrub and treelines and offsite riparian corridor were considered to be of ecological significance at a local level and were likely to be utilised by a variety of species such as birds, foraging & commuting mammals, and potentially small isolated populations of reptiles. It is recommended that the boundary features (southernmost riparian corridor and treelines with associated scrub) be retained as dark wildlife corridors for commuting mammals and birds. The southernmost offsite running watercourse eventually flows into the Pembrokeshire Marine SAC and Milford Haven Waterway SSSI and as such it is recommended that any proposed development is accompanied by a Construction Environmental Management Plan (CEMP) stating how any site construction surface water runoff and pollution incidents are prevented or minimised.

At the time of writing this report there was no proposed development plans and as such it was not known which habitats will be lost and which buildings will be affected. The majority of the prefabricated structures onsite had negligible bat roosting potential and will not require further targeted surveys if they are to be affected by any proposed development. However, a number of structures were considered between low-moderate bat roosting potential requiring further surveys if they are to be affected by the proposed development. The scrub and wasteland onsite were considered suitable habitat to support small populations of common reptile species, and as such if they are to be lost as part of the development, correspondence with the local planning authority will be required to establish whether a precautionary approach to vegetation clearance is required.

The use of the improved grassland field by ground nesting birds could not be precluded at the time of the survey, and as such further correspondence with the local planning authority will be required regarding further surveys or mitigation. Any proposed scrub clearance should also be undertaken outside the bird-breeding season (i.e. clearance between September and March inclusive) or preceded by a visual check for nesting birds.

## 1.0 INTRODUCTION

- 1.1 Bay Ecology was commissioned [REDACTED] to undertake an ecological appraisal of a parcel of land located at Carew Airfield, Pembrokeshire (Grid Ref: SN 05257 02705) (Appendix I). It is my understanding that the site is to be promoted for use as a waste/recycling centre.
- 1.2 The parcel of land is comprised of a variety of habitats dominated by a large improved grassland field, and large areas of hard standing associated with the former Carew airfield; scrap metal premises and breeze block and aggregate manufactures/distributers. Areas of marginal scrub & tall ruderal were located around site along the boundaries and earth bunds; whilst boundary treelines & standard trees along with running ditches were associated with the southern extent of site. The site is surrounded by agricultural land with the remaining Carew Airfield located to the north east.
- 1.3 This report provides a summary of the preliminary ecological appraisal undertaken in February 2020 and includes recommendations on any ecological constraints/ opportunities associated with the proposed waste/recycling centre.

## 2.1 METHODOLOGY

- 2.2 In order to establish the baseline ecological conditions on site and in the adjoining habitats, a combination of desk-based consultation and walkover survey were undertaken in February 2020.

### Desk study

- 2.3 This element of the work primarily involved consultation with the West Wales Biodiversity Information Centre (WWBIC) to identify any records of rare, protected or notable flora and fauna within the proposed development site boundary (see plan in Appendix I) and surrounding 1 km area. A search for relevant information available via the Internet was undertaken with data searches limited to an area extending up to 1km from the site centre.

### Extended Phase I Habitat Survey

- 2.4 Fieldwork was undertaken on the 24<sup>th</sup> February 2020 by a suitably qualified ecologist and followed standard Phase 1 Habitat Survey protocol (JNCC 1990) as amended by the Institute of Environmental Assessment (1995). All habitats within the proposed development site were classified. All habitats considered having potential to support rare, protected or otherwise notable species of flora and fauna were noted, as were any direct signs of these species (e.g. Badger setts and dung-pits). The survey also incorporated a subjective, ground-based assessment of the potential of mature trees and structures on site to support roosting bats.
- 2.5 During the field survey, any trees immediately adjacent to the site were assessed for their potential to support roosting bats and were categorised in relation to the bat roosting features (BCT, 2016). The categories are as follows:
- Known or confirmed roost
  - High – A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
  - Moderate – A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
  - Low – A tree of sufficient size and age to contain Potential Roosting Features (PRFs) but with none seen from the ground or features seen with only very limited roosting potential.

- Negligible - Negligible habitat features on site likely to be used by roosting bats.

## Daytime Inspection

- 2.6 The ecological appraisal comprised of an external and internal inspection of structures onsite. However, many of the structures only had limited access at the time of the survey due to their commercial occupancy, with some structures locked at the time of the survey. In order to establish the potential presence of roosting bats (or nesting birds) at the building, the survey aimed to identify:
- if bats are, or have been, present within the building and, if so, which species are present;
  - the type of roost (e.g. day roost, feeding perch, night roost, hibernaculum);
  - how bats use the buildings (e.g. location of, exit and entrance points to potential roosts);
- 2.7 External surveys at the site involved the use of binoculars and ladder to identify possible access/entry points into the buildings and aimed to identify any evidence of use by bats such as droppings, staining, prey remains etc. The internal survey searched for similar evidence of current or historical use by bats. The survey was undertaken from ground-level around the exterior of the buildings; and was assisted by the use of close-focus binoculars and a high powered torch (1 million candlepower).
- 2.8 The surveyor searched for roost evidence (droppings, staining, scratch marks, etc.) as described above and an assessment of the buildings potential to support nesting birds was also undertaken. The scope of the bat inspection survey was based on guidelines published by the Bat Conservation Trust (BCT)(2016).
- 2.9 Additionally any species listed as a pernicious weed under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended) were also noted during the field survey. Examples of such species include Japanese Knotweed *Fallopia japonica* and Himalayan Balsam *Impatiens glandulifera*.

## Limitations

- 2.10 The extended phase 1 survey was conducted outside the optimum period for this type of survey (May-July) and subsequently much of the spring flowering ground flora was not visible. A full assessment of the ground flora was not therefore possible.

## 3.0 RESULTS

### Desk study

- 3.1 The data provided by WWBIC identified that the site did not contain any statutory or non-statutory conservation designations. However, the Pembrokeshire Marine Special Areas of Conservation (SAC) and Milford Haven Waterway Sites of Special Scientific Interest (SSSI) were located approximately 0.8km north of site. The Pembrokeshire Marine SAC and Milford Haven Waterway SSSI were designated for their riparian/estuarine habitats and qualifying aquatic/riparian species, which differed to the habitats identified onsite. However, the application site did have some limited hydrological connectivity to the designations due to the boundary watercourse that ran along the southern boundary of site eventually flowing into the estuary. The Milford Haven Waterway SSSI is designated for, amongst other features, internationally important populations of Greater Horseshoe bats, as well as nationally important numbers of Lesser Horseshoe bats, with the woodland, estuarine and grassland habitats providing essential feeding grounds for the bats, as well as flight paths between sites. The SSSI (bats) was of some relevance to site due to the mobile nature of the bat species that are qualifying features of the designations, potentially utilising the linear habitat (riparian corridor and treelines) and structures onsite (very limited).
- 3.2 A single record of Small Heath butterfly *Coenonympha pamphilus* was associated with the northern boundary of site, although the record was located on the former airfield hard standing. A number of notable and protected species records were identified in close proximity to site and within 1 km of the site. A number of roosting bat records were associated with the adjacent commercial premises (Dairy Hays) and former airfield structures located approximately 0.3km west of site including numerous Greater Horseshoe Bat *Rhinolophus ferrumequinum*, and a Brown Long-eared bat *Plecotus auratus* maternity roost. Records of Lesser Horseshoe bats *Rhinolophus hipposideros* were also associated with the Carew Cheriton Church; whilst records of crevice dwelling species such as Pipistrelle *Pipistrellus sp.* and *Myotis sp.* were recorded within the area. A number of bird records were associated with the nearby estuary and agricultural land and included ground nesting species such as Lapwing *Vanellus vanellus* and Skylark *Alauda arvensis* that are potentially of some relevance to the grassland field located at the centre of site. Consistent records of breeding Barn Owl *Tyto alba* were located within the area. However, the exact location of the species was not provided within the data search. Records of Grass Snake *Natrix Helvetica*, Common Lizard *Zootoca vivipara* and Slow-worm *Anguis fragilis* were also identified within a 1km radius of site and were considered of relevance to the marginal scrub habitats; whilst records of Badger *Meles meles* and Otter *Lutra lutra* were also identified and were considered to be some relevance to the boundary habitats.

## Field Survey

### Overview

3.3 The results of the day-time inspection are summarised in the following sections. The parcel of land is comprised of a variety of habitats dominated by a large improved grassland field, and large areas of hard standing associated with the former Carew airfield; scrap metal premises and breeze block and aggregate manufactures/distributers. Areas of marginal scrub & tall ruderal were located around site along the boundaries and earth bunds; whilst boundary treelines & standard trees along with running ditches were associated with the southern extent of site. The site is surrounded by agricultural land with the remaining Carew Airfield located to the north east. See Appendix II for the Phase 1 Map.

### Improved Grassland

3.4 A large central area of the site was dominated by improved grassland that had a short sward length (Cover Photo, Target Note 1). The grassland was dominated by Perennial Rye Grass *Lolium perenne*, Annual Meadow Grass *Poa annua*, White Clover *Trifolium*, Dandelion *Taraxacum sp.* and Ribwort Plantain *Plantago lanceolate*.

### Poor Semi-improved Grassland

3.5 The improved grassland field was bordered by a more botanically diverse semi-improved grassland margin (Photo 1, Target Note 2) which included such species as Cock's Foot *Dactylis glomerate*, False Oat *Arrhenatherum elatius*, Dock *Rumex sp.* and Umbellifer *sp.*.

### Hard Standing

3.6 The majority of the remaining areas onsite were dominated areas of hard standing and bare earth associated with the former Carew airfield located to the north and north east (Photo 2, Target Note 9), as well as the commercial businesses and associated infrastructure that occupied the southern extent of site

### Scrub/Bracken

3.7 Stands of dense scrub were associated with the earth bunds that bordered the site to the north and east (Photo 3, Target Note 3, 12 & 14); whilst corridors of scrub were located in the southern extent (Photo 4, Target Note 20). The scrub was dominated by Bramble *Rubus fruticosus* and Buddleia *Buddleja davidii* with smaller amounts of Gorse *Ulex europaeus* and standard Ash trees saplings *Fraxinus excelsior*. The scrub also had associated ground flora that included such species as Hawkbit *Leontodon sp.*, Colt's Foot *Tussilago farfara*, Dead Nettle *Lamium*, Nettle *Urtica dioica*, Teasel *Dipsacus fullonum* and Willowherb *Epilobium sp.*.



***Photo 1: Poor semi-improved grassland margin (view looking east).***



***Photo 2: Former airfield runway (view looking west).***





***Photo 3: Scrub on earth bund (view looking east, Target Note 12).***



***Photo 4: Scrub area located at western extent of site (view looking south, Target Note 20).***



### *Ephemeral Water*

- 3.8 Areas of small ephemeral water pools were located around site (Photo 5, Target Note 21). The pools had associated vegetation which included Rush *Juncus sp.* and Sphagnum.

### *Running Ditch*

- 3.9 An offsite running ditch was identified at the southernmost boundary of site (Photo 6, Target Note 33); whilst a running ditch flowed along the northern boundary of the lower tier of site located at the southern extent (Photo 7, Target Note 29) eventually flowing into the offsite ditch. The ditch was colonized by *Juncus sp.* and Creeping Buttercup *Ranunculus repens*.

### *Treeline*

- 3.10 A treeline was located in the southern extent of site and was located on a slope between the upper and lower tiers of site (Photo 8). The trees were dominated by Ash with Ivy *Hedera helix* cover and had an associated ground flora dominated by Ivy and Bramble. A treeline was also located along the southern boundary and was dominated by Ash with ivy coverage with a bramble margin (Photo 9).

**Photo 5: Ephemeral waterbody (Target Note 21).**





**Photo 6: Boundary running ditch (view looking west, Target Note 29).**



**Photo 7: Onsite running ditch (Target Note 33).**





**Photo 8: Treeline (Target Note 28).**



**Photo 9: Southern boundary treeline.**



### *Pernicious Weeds*

- 3.11 Stands of Montbretia *Crocsmia X crocosmiflora* were identified within the scrub located in the southern extent of site (Target Note 21). Montbretia is listed under Schedule 9, Section 14 of the Wildlife and Countryside Act 1981 (as amended), making it is an offence "to plant or otherwise encourage" their growth.

## Fauna

3.12 In the course of the survey, a search for field signs of protected or notable species was undertaken and the potential of the habitats to support these species considered. In the context of this report notable species were those considered to meet any of the following criteria:

- Species protected by British or International law;
- Environment (Wales) Act Section 7 Priority Species or local BAP species;
- Nationally rare or nationally scarce species;
- Species of Conservation Concern (e.g. JNCC Red List, RSPB/BTO Red or Amber Lists)

## Birds

3.13 During the survey multiple bird species were noted onsite and in adjacent habitat including Blue Tit *Cyanistes caeruleus*, Woodcock *Scolopax rusticola* (flushed from scrub margin), Starling *Sturnus vulgaris* and Bullfinch *Pyrrhula pyrrhula*. The hedgerows and scrub were considered to be capable of offering nesting habitat for local birds. The use of the improved grassland field (Cover Photo & Target Note 1) by ground nesting birds such as Skylark & Lapwing, which had been identified during the data search within the adjacent agricultural land could not be precluded. Even though none of the birds that were recorded were particularly rare or endangered, Bullfinch and Starling are on the Red List of species of Conservation Concern in the Wales (Johnstone *et al.* 2012).

## Badgers

3.14 No evidence of badger activity was noted onsite. However, mammal tracks were identified in the southern extent of the site (Target Note 18), and the use of the grassland and scrub areas as a foraging resource could not be precluded. Records of Badger were identified during the WWBIC data search.

## Bats

### Buildings: Prefabricated Corrugated Metal Structures

3.15 A number of prefabricated corrugated metal structures were identified onsite including Plant Hire Storage Structures (Photos 10 & 11, Target Notes 5 & 6 respectively), and Car Dismantling Garage and open storage structure (Photos 12 & 13, Target Notes 17 & 16 respectively).

3.16 The Plant Hire Storage structures were locked at the time of the survey and as such no internal survey could be conducted. However, no evidence of roosting bats was identified externally, and the prefabricated nature of the structures meant there was very limited bat roosting features and were considered to be of negligible bat roosting potential (BCT, 2016).

- 3.17 The Car Dismantling open corrugated structure had a metal frame and transparent plastic sheets to provide further light ingress internally. The building was light and draughty with no evidence of roosting bats externally or internally. The structure was considered to be of negligible bat roosting potential.
- 3.18 The Car Dismantling Garage was locked at the time of the survey and no internal inspection was conducted. However, potential access points to the internal structure were identified beneath the pitched roof (Photo 14) and the door (Photo 15). No evidence of roosting bats was identified externally, and the prefabricated nature of the structures meant the structure was considered to be of negligible/low (BCT, 2016).

**Photo 10: Plant Hire Storage Building (Target Note 5).**





**Photo 11: Plant Hire Storage Building (Target Note 6).**



**Photo 12: Car Dismantling Garage (Target Note 17).**





**Photo 13: Car Dismantling Open Storage Structure (Target Note 17).**



**Photo 14: Potential access beneath pitch roof edge on southern elevation (Target Note 17).**



***Photo 15: Potential access beneath pitch door on western elevation (Target Note 17).***



**Buildings: Portable Cabins**

3.19 A number of portable cabins were located around site (Photo 16, Target Note 4 & 16) and utilised as offices and storage and were considered to be of negligible bat roosting potential due to their prefabricated nature and lack of bat roosting features.

**Buildings: Inaccessible Compound**

3.20 Whilst conducting the Extended Phase 1 survey a locked compound was identified west of the scrap yard. It was evident a number of prefabricated structures (Photo 17) were present onsite and constructed from a variety of materials including corrugated metal and wooden plywood cladding (Photo 18).



***Photo 16: Portable cabins located at western extent of site (Target Note 4).***



***Photo 17: Locked compound with multiple structures (view looking east).***



**Photo 18: Locked compound building with wooden cladding (view looking south).**



**Buildings: Former Hangar**

- 3.21 A former aircraft hangar was located at the southern extent of site and was being utilised by a breeze block manufacturer/distributor (Photo 19, Target Note 23). The main hangar was constructed from rendered block with a curved metal corrugated roof, with large sliding double doors on its western elevation. The structure had a mono pitched annex on its northern elevation (Photo 20); whilst a single storey flat bitumastic roof extension was located on the southern elevation (Photo 21). The extension was being utilised as an office and had uPVC windows and wooden doors and soffit. The hangar had a combination of wooden and metal fascias. No evidence of roosting bats was identified externally. However, potential bat roosting features were associated with the fascia (Photo 22).
- 3.22 Limited access was available to the hangar due to the building being in current use and operation as a workshop. However, the structure appeared to be relatively light due to the numerous windows and skylights and was draught free (Photo 23). Generally, the structure was considered to be of moderate bat roosting potential due to the multiple potential bat roosting features.



**Photo 19: Former hangar (view looking east, Target Note 23).**



**Photo 20: Former hangar mono pitched extension on northern elevation (view looking south).**



***Photo 21: Single storey flat roof extension on southern elevation (view looking north west).***



***Photo 22: Potential access point beneath fascia.***



***Photo 23: Interior of hangar utilised as workshop.***



#### Buildings: Concrete Structure

3.23 A concrete structure was located in the breeze block manufactures yard and was utilized for storing aggregate before being fed onto a conveyor belt on a lower tier (Photos 24 & 25, Target Note 26). A thorough inspection of the structure could not be conducted due to health and safety restricting the access to the working feature. However, it was evident that multiple potential bat roosting features were present on the structure, which could be utilised by crevice dwelling bat species; whilst some limited features could also be utilised by free hanging bat species and as such the structure was considered to be of moderate bat roosting potential.



***Photo 24: Concrete Structure utilised for aggregate storage (Target Note 26, view looking east).***



***Photo 25: Concrete Structure utilised for aggregate storage viewed from lower tier.***





### Buildings: Aggregate Distributor

- 3.24 At the southernmost extent of site an aggregate distributor yard was located. The commercial premises included a large corrugated metal prefabricated structure with a pitched roof that was utilised as a workshop (Photo 26, Target Note 31). Limited access was available to the workshop due to being in current use. However, it was evident the interior was dark and draught free. Multiple potential access points to the interior were identified. However, the corrugated metal nature of the structure meant it was considered to be of negligible/low bat roosting potential.
- 3.25 Amongst all industrial machinery a small prefabricated metal pitched roof structure was located (Photo 27, Target Note 30). The structure had very limited bat roosting features and was constantly being disturbed by dust and water from the industrial processes in the yard, and as such was considered to be of negligible bat roosting potential.

***Photo 26: Corrugated metal structure located in aggregate distributor yard (Target Note 31, View looking east).***



**Photo 27: Small prefabricated building amongst industrial machinery (Target Note 30, View looking north).**



#### Bats: Standard Trees & Treelines

3.26 The standard trees and treelines onsite were considered to be of negligible/low bat roosting potential (BCT, 2016) due to their age and nature preventing the presence of potential bat roosting features. The presence of Ivy on some trees only provided very limited bat roosting features. The southernmost treelines, scrub and offsite riparian corridor habitats onsite were considered to be suitable foraging and commuting resources for the local bat species.

#### *Reptiles*

3.27 The majority of the site footprint comprised of improved grassland and hard standing was considered unsuitable habitat for common reptile species due to the short managed sward length and lack of vegetation respectively. However, the areas of marginal scrub, and wasteland that contained piles of tree stumps (Photo 28, Target Note 19) and rubble (Photo 29, Target Note 22) were considered potentially suitable habitat for isolated populations of common reptiles species such as Slow-worm, which were identified within a 1km radius during the data search.



***Photo 28: Piles of tree stumps in wasteland (Target Note 19).***



***Photo 29: Piles of rubble in wasteland (Target Note 22).***



### *Dormouse*

- 3.28 The majority of scrub onsite were generally isolated features within a landscape of hard standing and improved grassland fields with very limited connectivity to the surrounding agricultural landscape. However, the southernmost treeline and associated scrub contained woody species such as Bramble that were considered to offer a potentially suitable mosaic of foraging and nesting habitat for Dormouse *Muscardinus avellanarius*. The treeline wasn't accessible to identify any Hazel and/or conduct a Hazel nut search, and the presence of Dormice onsite could not be precluded. However, no internet records of Dormice exist within a 1km radius of site. The southernmost treeline is likely to be retained as part of any proposed development and as such the species will not be considered further in this report.

### *Otter & Water Vole*

- 3.29 The offsite watercourse wasn't accessible during the field survey and as such no evidence of Otter and Water Vole *Arvicola amphibious* were identified. However, the watercourse was spatey in nature and heavily shaded limiting its suitability for Water Vole, although the use of the watercourse by foraging and commuting Otter was considered highly likely. The running ditches around the aggregate and breeze block site were heavily engineered and culverted and the use by both species was considered unlikely. Records of Otter exist within 1km of site. However, no records of Water Vole were identified. Any proposed development will not directly affect the offsite watercourse and riparian corridor.

## **4.0 LEGISLATION, POLICIES AND PLANS**

- 4.1 The following international, national and local legislation and planning policies relating to nature conservation and biodiversity are considered of relevance to the any future development.

### **National Planning Policy**

- 4.2 In terms of planning policy, a number of over-arching policies are of relevance not least of which are those described within Planning Policy Wales (PPW), which sets out land use planning policies of the Welsh Assembly Government with Chapter 5 dealing with Conserving and Improving Natural Heritage and Coast. The advice contained within PPW is supplemented for some subjects by Technical Advice Notes (TAN's), with TAN 5 addressing Nature Conservation.

### **Technical Advice Note 5 (2016)**

- 4.3 TAN 5 identifies a number of key principles, which the Town and Country Planning system in Wales should incorporate those relevant are detailed below:
- work to achieve nature conservation objectives through a partnership between local planning authorities, CCW, the Environment Agency, voluntary organisations, developers, landowners and other key stakeholders;
  - integrate nature conservation into all planning decisions looking for development to deliver social, economic and environmental objectives together over time
  - ensure that the UK's international obligations for site, species and habitat protection are fully met in all planning decisions;
  - Look for development to provide a net benefit for biodiversity conservation with no significant loss of habitats or populations of species, locally or nationally.
  - Promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Minimising or reversing the fragmentation of habitats and improving habitat connectivity through the promotion of wildlife corridors;
  - Local planning authorities should seek to protect trees, groups of trees and areas of woodland where they have natural heritage value or contribute to the character or amenity of a particular locality;
  - The presence of a species protected under European or UK legislation is a material consideration when a local planning authority is considering a development proposal which, if carried out, would be likely to result in disturbance or harm to the species or its habitat.

## Environment (Wales) Act, 2016

- 4.4 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

### *Section 6 - Biodiversity and resilience of ecosystems duty*

- 4.5 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'.

### *Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity*

- 4.6 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.

## Local Planning Policy – Pembrokeshire County Council, Adopted LDP (2013)

- 4.7 Pembrokeshire County Council adopted the Local Development Plan (LDP) on the 28th February 2013 for Pembrokeshire (excluding the area of the Pembrokeshire Coast National Park). This LDP provides the framework for decisions to be made up until 2021 on how land is used and developed.

General Policies of relevance to the former Carew airfield include:

### *GN.37 Protection and Enhancement of Biodiversity*

*All development should demonstrate a positive approach to maintaining and, wherever possible, enhancing biodiversity. Development that would disturb or otherwise harm protected species or their habitats, or the integrity of other habitats, sites or features of importance to wildlife and individual species, will only be permitted in exceptional circumstances where the effects are minimised or mitigated through careful design, work scheduling or other appropriate measures.*

## *Habitats Regulations Assessment (HRA)*

- 4.8 The Local Development Plan is also subjected to a Habitats Regulation Appraisal, required under European law<sup>1</sup>. This legislation has been developed in order to ensure that the highest level of protection is afforded to European designated sites; namely Special Areas of Conservation (SAC) and Special

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<sup>1</sup> As a requirement of the Habitats Directive 92/43/EEC transposed by The Conservation of Habitats and Species Regulations 2010

Protection Areas (SPA). The requirement for HRA also applies to individual projects which have the potential to affect designated sites or their associated qualifying features (habitats or species).

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

- 4.9 Part 1 of the Environment Act Wales' came into force in May 2016 and sets out the approach to planning and managing natural resources at a national and local level with a general purpose linked to statutory 'principles of sustainable management of natural resources' defined within the Act.

### *Section 6 - Biodiversity and resilience of ecosystems duty*

- 4.10 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'.

### *Section 7 - Biodiversity lists and duty to take steps to maintain and enhance biodiversity*

- 4.11 This section lists living organisms and types of habitat in Wales which are considered of key significance to maintaining and enhancing biodiversity in relation to Wales. The Welsh Ministers are required to take all reasonable steps to maintain and enhance the living organisms and types of habitat included in any list published under this section, and encourage others to take such steps.



## 5.0 CONCLUSIONS AND RECOMMENDATIONS

- 5.1 The field survey undertaken at the site identified a variety of habitats dominated by a large improved grassland field, and large areas of hard standing associated with the former Carew airfield; scrap metal premises and breeze block and aggregate manufactures/distributers. Areas of marginal scrub & tall ruderal were located around site along the boundaries and earth bunds; whilst boundary treelines & standard trees along with running ditches were associated with the southern extent of site. The site is surrounded by agricultural land with the remaining Carew Airfield located to the north east.
- 5.2 In terms of the ecological importance of the site the improved grassland and hard standing was of low intrinsic ecological value and represented the most suitable area of the site to support any future development. However, the marginal scrub and treelines and offsite riparian corridor were considered to be of ecological significance at a local level and were likely to be utilised by a variety of species such as birds, foraging & commuting mammals, and potentially small isolated populations of reptiles. It is recommended that the boundary features (southernmost riparian corridor and treelines with associated scrub) be retained as dark wildlife corridors for commuting mammals and birds. The southernmost offsite running watercourse eventually flows into the Pembrokeshire Marine SAC and Milford Haven Waterway SSSI and as such it is recommended that any proposed development is accompanied by a Construction Environmental Management Plan (CEMP) stating how any site construction surface water runoff and pollution incidents are prevented or minimised.

### *Bats*

- 5.3 The standard trees and treelines were considered to be of negligible bat roosting potential (BCT, 2016) due to their lack of bat roosting features. However, the southernmost treelines, scrub and offsite riparian corridor habitats onsite were considered to be suitable foraging and commuting resources for the local bat species. The southernmost treeline and offsite riparian is likely to be retained as any future development, and on this basis, it is considered that the development would not conflict with the conservation objectives associated with the Greater Horseshoe & Lesser Horseshoe bats which are qualifying features of the Milford Haven Waterway SSSI and the wider Pembrokeshire Bat Sites and Bosherton Lake SAC. However, it is recommended that no direct or incidental lighting of the boundary habitats are proposed to maintain the features as a dark corridors for foraging and commuting bats.
- 5.4 At the time of writing this report there were no plans for the proposed development and as such it is unclear which structures are to be affected by any proposed development. The majority of the structures onsite were prefabricated corrugated metal buildings and considered to be of negligible bat roosting potential, and if any future development were to affect these structures, they would not require further



targeted bat activity surveys. However, the former hangar & concrete aggregate structure, aggregate distributor structure and car dismantling garage will require further bat activity surveys if they are to be affected by any proposed development. Some structures were not accessible due at the time of the survey and will require further consideration.

#### Otters

- 5.5 The use of the offsite running watercourse by Otter could not be precluded, but was considered likely due to it being considered a suitable foraging and commuting corridor. However, the feature is to be retained as part of any proposed development. It is recommended that no direct or incidental lighting of the feature is proposed maintaining it as a dark corridor for Otter, which are a qualifying feature of the Pembrokeshire Marine SAC.

#### Reptiles

- 5.6 The improved grassland and hard standing were generally considered to be unsuitable for common reptile species due to its managed short sward length and lack of vegetation respectively. However, the scrub and wasteland containing piles of tree stumps and rubble could potentially support small populations of common reptile species. If any of the scrub or marginal habitats are to be affected by any proposed development, correspondence with the local planning authority ecologist is required as to whether a precautionary sensitive vegetation clearance is adopted, allowing any potential reptile species to disperse to retained habitats. All common reptiles are protected against intentional killing or injury under the Wildlife and Countryside Act 1981 (as amended).

#### Birds

- 5.7 The use of the improved grassland field by ground nesting birds such as Skylark & Lapwing, which had been identified during the data search within the adjacent agricultural land could not be precluded, and further consideration of these species will require correspondence with the local planning authority ecologist. The treelines and scrub were considered to offer suitable habitat for breeding birds, whilst there is some potential that some of the structures onsite could be utilised by nesting birds. Given the potential presence of breeding birds any proposed site clearance works/demolition works should be undertaken outside the bird-breeding season (i.e. clearance between September and March inclusive) or preceded by a visual check for nesting birds. All wild birds are protected against killing and injury under the Wildlife and Countryside Act 1981 (as amended) and their nests against damage or destruction whilst in use or being built.

## REFERENCES

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## APPENDIX I SITE LOCATION PLAN

## APPENDIX II PHASE 1 MAP

Target Note	Description/Comment
<i>Birds Seen/Heard:</i> Starling, Jackdaw, Rocks, Woodcock, Bullfinch, Robin, Blue Tit, Blackbird,	
1	Improved grassland field: Perennial Rye Grass, Dock, Buttercup, Dandelion, Hawkbit.
2	Margin of poor semi-improved grassland: Dock, Cocksfoot, False Oat, Umbellifer, Vetchling.
3	Bramble margin along fence (Heras fence). Nettles, Umbellifers.
4	Two portable cabins.
5	Corrugated metal building. (Locked).
6	Corrugated metal building. (Locked).
7	Yard used for storage of construction material, wood, pipes etc. Margin of bramble.
8	Bank with teasel, gorse, Colt's foot,
9	Hard standing (former runway).
10	Hawthorn with nest.
11	Wood chippings, trailers, bramble margin and fence.
12	Erath bund with bramble, buddleia, piles of wood (reptiles).
13	Metal fence and cleared ditch.
14	Bramble verge and Ash saplings and teasel.
15	Earth bund with Buddleia and buttercup.
16	Large corrugated building open draughty. Large corrugated garage locked with potential access points (locked). (negligible/low bat potential). 2 portable cabins stacked.
17	Yard locked with corrugated metal and wooden clad buildings. Earth bund with buddleia and ivy.
18	Mammal track on earth bund.
19	Log piles and trees.
20	Earth bund with buddleia and bramble. Some tall ruderal Willowherb on bare earth margin including such species as Hawkbit, Sphagnum, Teasel, Ash saplings, Gorse, Colt's foot.
21	Ephemeral water pool in wasteland with willowherb margin, juncus sp., sphagnum, Montbretia.
22	Piles of rubble being colonised by hawkbit, cleavers, Bamboo and Dead

Target Note	Description/Comment
	Nettle.
23	Concrete hangar with curved corrugated metal roof. Large double doors. Some wooden windows. Annex with mono pitched roof with wooden and metal fascias (bat potential under fascias). Extension with flat bitumastic roof and uPVC windows, wooden doors and soffits. Moderate bat potential.
24	Improved grassland with bramble bank lower slope dominated by Colt's foot.
25	Chipping piles.
26	Concrete structure with bat roosting potential (holes in walls). Lower level dark rooms. Limited inspection (health and safety). Moderate bat roosting potential.
27	Yard hard standing breeze block storage.
28	Ash dominant treeline with some ivy. Bramble margin with buddleia.
29	Offsite running ditch.
30	Prefabricated building corrugated metal roof. uPVC windows. Cabins and machinery.
31	Large corrugated metal storage shed dark interior draught free. Limited internal access. Pitched roof gaps under overhang. (Low bats potential).
32	Standard Ash treeline in bramble scrub. Willow stands between levels.
33	Running ditch with Juncus sp.. Culverted.