Emma Evans

From: No Reply - Pembrokeshire County Council
Sent: 24 November 2024 12:00
To: LDP - For Enquiries
Subject: LDP consultation

Follow Up Flag: Follow up
Flag Status: Completed

Categories: D Rep

Pembrokeshire County Council Local Development Plan 2 Deposit 2

DATE
TIME 11:59:52 AM

Question	Answer
Name:	Leigh Duffy
Job Title:	
Organisation:	
Address:	[redacted]
Telephone Number:	

Question	Answer
Name:	
Job Title:	
Organisation:	
Address:	
Telephone Number:	
Main Contact Email Address:	[redacted]
Date:	
Your name / organisation:	Leigh Duffy
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 sound and meets procedural requirements
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 plan text, LDP 2 Deposit 2 proposal map
Other (Please specify):	

Question	Answer
Policies:	SP 8
References:	HSG/095/LDP2/3 (Candidate Site reference CS 373)
Selected Features:	Settlement_Monitoring_Reference:95,Settlement_Hierarchy_Position:Main Town,Settlement:Pembroke,Policy:SP 8,Housing_Market_Area_Band:3 Comments:I am fully supportive of the decision to remove Candidate Site reference CS 373 (Deposit Plan reference HSG/095/LDP2/3) from the LDP2. The decision to defer this development until infrastructure improvements to Well Hill are made is sound and recognises the concerns of the majority of residents in the locality. We expressed these concerns by individual and collective petition during previous consultation rounds and it is reassuring that these concerns have been considered. The decision to remove the proposed site demonstrates consistency with many of the stated aims and policies contained within the LDP2. The specific policies are addressed individually within the attached evidence.
Would you like the LDP to include a new policy, site allocation or paragraph?:	
Site reference (if known)::	
Name::	
Location::	
Justification on inclusion of alternative site allocation, policy or paragraph:	
Are you submitting additional material to support your representation?:	Yes
Supporting document 2 (5mb limit):	

Question	Answer
Supporting document 3 (5mb limit):	
If you are objecting to the LDP, do you want to speak at a hearing session of the public examination?:	I do not want to speak at a public hearing and am happy for my written representations to be considered by the Inspector
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.

Evidence supporting decision to remove Candidate Site reference CS 373 (Deposit Plan reference HSG/095/LDP2/3) from the LDP2.

Within your Deposit Plan, **SP 6 Settlement Boundaries** *"…defines the … visual extent of the settlement and take into account proposed allocations"* whilst **GN 1 General Development Policy** states *"8. It would not cause or result in unacceptable harm to health and safety".* Removal of this proposed site adheres to these commitments by recognising the increased risk to road safety it presents.

The proposed site is bordered by dangerous bends around two corners of its perimeter. A sweeping 90° bend along its southwest corner, and more dangerously a sharp, blind 90° bend at its northwest corner.

Lower Lamphey Road is frequently used by agricultural vehicles from nearby farms and heavy plant transportation from local business which often have to 'straddle' the main road owing to their size. These vehicles are currently able to somewhat mitigate the road safety risk by having an elevated view around this dangerous section of road over the small wall that borders the proposed site; development of the site would eliminate or significantly restrict this vantage point making these large plant vehicles more susceptible to collision with normal road users and pedestrians.

The Lower Lamphey Road connecting Lamphey and Pembroke is already used as a 'rat run' for school traffic, congesting this route for residents around peak times. This is particular around its junction with Well Hill, Pembroke where off-road parking adds to congestion and recent changes to the Well Hill road make exiting the junction more dangerous; adding traffic to the most dangerous section of this road would further increase risk.

Lower Lamphey Road is a popular route for walkers and dog-walkers alike, owing to its attractive, semi-rural scenery. It also forms part of the *sustrans* National Cycle Network Route 4, and is incredibly popular with tourist and athletic cyclists, as well as runners who use it individually and as part of local clubs.

There currently exists a lack of adequate safe pedestrian access along large stretches of Lower Lamphey Road, indeed a lack of any dedicated safe access in many places.
Much of it is single carriageway requiring repeated giving of right of way between vehicles due to its limited width and lack of passing places.
The nature of Lower Lamphey Road, as the original Pembroke-Lamphey link road and now a secondary route between settlements owing to its rural nature means the road in many places would be incapable of accommodating new pedestrian access or carriageway upgrades as its width is limited along large sections. This unavailability of mitigative measures against traffic increases would inevitably subject pedestrians and cyclists to increased risks associated with the additional traffic that would be created by this proposal.

Referencing **The Active Travel (Wales) Act, 2013**, the Deposit Plan [4.109] states *"The Council strongly supports the principles that underpin active travel, as this provides a basis for travel by sustainable means".* It adds *"5.27 The principle of inclusive design should be applied to all new development in order to create accessible environments for all users that encourage walking, cycling*

and the use of public transport." Protecting this popular active travel route from the impacts associated with the proposed development demonstrate the Council's commitment to this Act.

The Deposit Plan **Key Issues and Drivers** [1.16] of *"directing development to locations with an available public sewerage network and wastewater treatment works capacity"* and *"The Plan's approach of directing growth to settlements with good levels of services"* have been complied with by removing the proposed site, given the absence of existence of many of the required services at the proposed site, and given the incapacity of those that do exist to support such a significant increase in duty.

The Deposit Plan **Key Issues and Drivers** [1.16] of *"respecting the benefits of green spaces and their contribution to wildlife, habitats, biodiversity and sense of place and where possible, ensuring that this is reflected in the density of new housing development"* and [4.26] that *"Settlement Boundaries ensure that development takes place in sustainable locations and that the natural environment is protected"* have prevailed by removing the proposed site. This gives priority to alternative development opportunities (brown field sites with O.P.P. granted for housing development on the same road), that would eliminate all impact to the environment and associated habitats.

GN 1 General Development Policy 8 states *"it would not cause or result in unacceptable harm to health and safety, including through flood risk".* The removal of the proposed site complies with this policy, recognising the surface water drainage limitations of the locale which would be exacerbated by the proposed development. The field immediately to the north of the proposed site results in significant volumes of run off rainwater which currently flows south following the topography of the road towards Rose Valley cottages and further east where large volumes of water and mud washed from this field accumulate on Lower Lamphey Road making sections of the road treacherous due to the lack of surface water road drainage in this area.
Currently a large portion of the run-off from this field in question, which is elevated relative to the road will be soaked away into the proposed development site; development of the site would reduce its natural capability of drainage by introducing impermeable and semi permeable surface treatments. Resultantly this would likely increase the volume of rainwater and mud running off onto this section of road which currently does not have the drainage capacity to cope with the current amount.

GN 1 General Development Policy adds *"5.2 Proposals must respect the capacity of individual settlements to accommodate growth in terms of both scale and rate of development".* Recognition of the infrastructure limitations at Well Hill junction in removing the proposed site from the LDP2 is consistent with this commitment. Furthermore, recognition should be given to the risks of disproportionate development impacting residents of Lower Lamphey Road when coupled with existing development sites already approved within the development boundary. There are currently 46 dwellings between Merlins Cross Garage and Rose Valley along the most heavily susceptible stretch of Lower Lamphey Road; the proposed site of 23 dwellings would represent a <u>50% increase</u> in housing in this area of Lower Lamphey Road.
There exists a further 64 dwellings between Merlins Cross Garage and Belmont Terrace, totalling 110 dwellings along the entirety of Lower Lamphey Road. The proposed development itself constitutes a <u>21% increase</u> of this total, however coupled with the current planned developments within the settlement boundary (11 dwellings at Merlins Cross Garage) would equate to a cumulative <u>31% increase</u> in dwellings. Lower Lamphey Road, by virtue of its original rural nature, does not have the capacity of infrastructure to support such a disproportionate increase in habitation.