



# Pembrokeshire County Council Local Development Plan 2 Deposit 2

DATE 16/12/2024

TIME 11:21:09 PM

Question

Answer

Name:



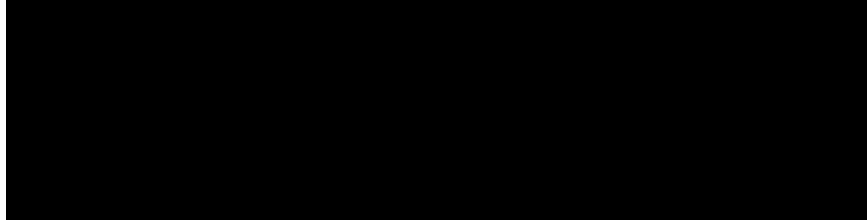
Job Title:

Projects Coordinator/Voluntary Director & Treasurer

Organisation:

Cwm Arian Renewable Energy Ltd (CARE)

Address:



Telephone  
Number:

Name:

Job Title:

Organisation:

Address:

Telephone  
Number:

Main Contact  
Email  
Address:



Date:

Your name /  
organisation:

Cwm Arian Renewable Energy Ltd (CARE)

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 plan text, LDP 2 Deposit 2 proposal map

Other  
(Please  
specify):

Policies:

Candidate site 331

References:

131/00021

Selected  
Features:

Site\_Name:Land adjacent Blaenffynnon  
Farm,Settlement:Tegryn,Minimum\_Units\_In\_Plan\_Period:13,Affordable\_  
Housing\_Requirement\_Percentage:0,Affordable\_Housing\_Requirement\_  
Unit\_Number:0,Units\_Beyond\_The\_Plan\_Period:12,Area

HA:1.53,Housing\_Component\_Type:Commitment,LDP2\_Reference:131/00021,Policy:GN 17 Comments:The representation is to include a proportion of candidate site 331 to extend the residential allocation of 131/00021

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

New site allocation

Site reference (if known)::

Candidate site refs 331 & 509

Name::

East of Blaenffynnon option 1 & East of Blaenffynnon option 2

Location::

Tegryn

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

The pre-existing candidate sites 331 & 509 have been currently cleared to Amber 4 level within the Local Development Plan Review (LDP2). We would like to propose that a smaller proportion of candidate site 331 (see Supporting document 1) be elevated to Residential Allocation (Green 4) in the LDP2 for the village of Tegryn. The summary of the justifications for this review of inclusion are: 1. The desperate need for affordable, healthy & efficient housing for local families/residents in NE Pembrokeshire which is currently and will in future be unmet. 2. No sign of the current residential allocation for Tegryn being developed. 3. Change of ownership of candidate sites to community organisation with proven record of delivering local social and environmental benefits. The detailed reasoning for these justifications can be found here: 1. The desperate need for affordable, healthy & efficient housing for local families/residents in NE Pembrokeshire which is currently and will in future be unmet. The 2021 - Pembrokeshire Local Housing Market Assessment conducted by HDH Planning & Development Ltd found within the LDP2 evidence base identifies that the parish of Clydau, where this candidate site is located, requires 16 new affordable homes before 2033. The only residential commitment within the parish - is LDP2 Ref 131/00021 which according to the LDP2 Proposal Maps has 0% provision for affordable housing. Therefore the current LDP 2 has absolutely no residential commitment to meet this estimated need within the parish of Clydau. So it would appear that LDP 2 in its current form will fail the community of Clydau in relation to social housing on the basis on its own evidence base. Tegryn is the optimum place to provide allocation provision for this affordable housing in Clydau as it is the only Service Village within the parish. As explained

below this candidate site, seeking review here, is the optimum location for this, due to its ownership by a Community Benefit Society that are actively aiming to promote affordable housing and have a record of being a reliable partner to PCC. In relation to PCCs Strategies and Plans: High on the priority list of PCCs corporate strategy for 2023-2028 is housing - "A3 - we will enable the delivery of affordable, available, adaptable and energy efficient homes". The corporate strategy identifies that: "Pembrokeshire...is experienc[ing] an acute shortage of affordable housing which is resulting in a steep increase in homelessness". Pembrokeshire has its own dedicated organisation tackling homelessness such is the issue in the county: [www.homelesspembrokeshire.org](http://www.homelesspembrokeshire.org). As residents of Pembrokeshire we are all aware of the considerable number of local individuals and families who do not have access to rent or buy, fit for purpose accommodation. So many Pembrokeshire residents are living in static caravans or other unhealthy dwellings or are engaged in multi-generational occupancy of what accommodation there is available, which is blighting both their physical and mental health. Clearly not enough affordable housing is being built that is available to local people who are often priced out of the market and have to leave communities where they were raised, often in the Welsh Language, to access suitable accommodation elsewhere. Unfortunately it is also a regularly told story, with in the county that private developers, with less of a social conscience, more driven by profit, often try every loop hole to avoid their planning commitments to building affordable homes so thwarting the measures of Pembrokeshire County Council to deliver this important societal need. Affordable housing for local people is key to the current LDP1 and its relevance is reviewed here: An indication of how important affordable housing is within the LDP1 is shown by the fact that it is referenced 129 times in the document. Affordable housing merits its own section (section 3.11) in LDP1's "Key, Trends and Issues" due to its importance and it is listed second in the issues impacting on (section 1.0) Sustainable Communities. In relation to the LDP1's Vision - affordable housing is essential "to ensure that Pembrokeshire is prosperous and that it remains vibrant and special by creating: a network of strong ..... rural communities" . In addition the Vision's primary level objective D refers to "developing vibrant communities providing a range and mix of homes" and the sub objectives: "D1: To provide sufficient land to meet the housing needs arising within the County Council's planning area, D2: To provide housing which is affordable & D3: To protect local culture and language." These all to be delivered by the policy approach of "All development in Small Local Villages to be affordable housing". Affordable housing meets the need expressed in SP 7 Housing Requirement and of course the SP 8 Affordable Housing Target. The candidate site being linked specifically to affordable housing in Tegryn it is also important to SP 9 Welsh Language, SP 12 Settlement Hierarchy, SP13 Settlement Boundaries and SP 15 Rural Settlement. In particular affordable housing for local people is required in North Pembrokeshire to preserve the Welsh Language (SP 9) as it is increasingly difficult for indigenous young Welsh Language speakers to find housing in this Welsh Language strong hold of the county where the language is being eroded. In relation to General

Policies GN 28 Local Needs Affordable Housing - it states that "Local needs affordable housing will be sought on all housing developments". In relation to GN29 - it states that "Local needs affordable housing on land that would not otherwise be released for housing will be permitted .... where the following criteria are met: 1. The site is within or immediately adjoining a Settlement Boundary; 2. A local need for affordable housing has been identified; 3. The community in which the site is located is adequately served with facilities to support the proposed development; and 4. All the benefits of affordable housing provision, built for the exclusive occupation of local people in need of affordable homes, will pass to the initial and all subsequent occupants". The candidate site for review here, we are confident, meets all four of these criteria. 2. No sign of the current residential allocation for Tegryn being developed. The candidate site that is seeking review here has been rejected on the grounds that it is "Not Required. Existing housing commitment with boundary provides appropriate level of growth for the settlement." The existing housing allocation which is designated to meet this appropriate level of growth, is the site with reference LDP 2 Ref 131/00021. As mentioned above this site has absolutely no - apparent provision for the foreseen requirement for affordable housing within the parish outlined above. Without knowing more details this appears to contradict the stated delivery approach of LDP1 in achieving Objective D of "All development in Small Local Villages to be affordable housing". In addition we would argue here that this housing commitment will not meet appropriate level of growth for significant residential houses of any description based on the progress of its development to date. Planning permission for residential properties on this land was applied for in 2004 with consent being given for 15 properties on the 21 March 2005 (Planning ref: 03/1297/PA). This coming March 2025 the site will have been under development for 20 years with only 4 of the original properties with planning permission being fully completed. It is difficult for us to gauge what the plans are for this site is because the application, and the ones subsequent to it regarding this development, are that old and dated that the supporting documents cannot be accessed from the planning portal. This is why we have requested a verbal representation at a public hearing in addition to this written representation in the hope that the planning documents are still on file in hard copy form at the Pembrokeshire County Hall for us to view to allow us to refer to them to support our case in this matter. In the absence of this information it is thought locally that planning for 32 houses was applied for in total on this site which would give it only a 12.5% delivery output over those 20 years. The approved housing allocation site was being developed by a company called Rapidgrid who are based outside of Pembrokeshire in Aberdare. They have been anything but rapid in relation to the development of the site. For whatever reason the development of the site has come to a standstill, be it potentially landbanking or organisational problems, the parish of Tegryn is being denied access to the new housing it needs to meet the demand outlined in the studies detailed in the LDP2 evidence base. It seems unfair that a plot of land that has not been developed properly for twenty years should be holding back other beneficial residential development candidate sites and especially those potentially

for affordable homes. It was expected that further development was going to happen on the site this year with foundations being laid - however they were immediately covered over with soil once completed leaving the local community wondering what the development on the site will be over the next 20 years. 3. Change of ownership of candidate site to community organisation with proven record of delivering local social and environmental benefits. Since candidate sites 331 & 509 were originally refused inclusion as residential allocation the land covered by both these sites has been purchased by the Community Benefit Society making this appeal. Cwm Arian Renewable Energy (CARE) would like to be able to utilise the land outlined for affordably housing for local families, couples and individuals. Through the inclusion of this site in the residential allocation of LDP2 this will enable CARE to realise these plans. CARE will maximise the opportunity of having this relatively small piece of land included by developing it at speed for the benefit of local people. CARE, its voluntary directors and staff have a well proven track record in delivering large projects for social and environmental benefit - and this opportunity would be no different. To enable this site to be developed in a low cost way, which would both promote affordable and environmentally friendly construction, CARE has already been working in collaboration with Self Build Wales - an initiative of the Welsh Government. The UK government in their guidance on "Self-build and custom house building" state that "Authorities should be aware that self-build and custom build can provide a route to affordable home ownership for those on low incomes" confirming this is a recognised way of delivering affordable homes. Due to the strong environmental ethos of CARE it can be assured that it will explore all avenues to make the future affordable homes as environmentally sustainable as possible. This ethos can be clearly seen by CARE's rather ground breaking redevelopment of an old petrol station, brown field site in the centre of the village of Hermon into an accessible eco build, arts and sustainability hub that has become a major part of the local community (PCC planning reference: 20/1191/PA). CARE's commitment to delivering a social and environmental projects for the benefit for the local community can be seen through its Objects, Vision and Purposes that are attached to this submission (See Supporting document 2). CARE has worked, sometimes closely, with PCC on a whole range of these social and environmental projects, from: tackling fuel poverty, promoting healthier homes through retrofit, installation of renewables and being partners on the Pembrokeshire Local Area Energy Plan; to: sustainable catchment management of the river Nyfer, creating new footpaths, biodiversity enhancement and local food initiatives along with providing community meals and a stocked community freezer. We hope there are many people within PCC that can vouch for the genuineness of our intentions and our ability to deliver. Finally it can be seen that the reduced candidate site is well provided for with services, see attached document of sewage, mains water and electricity provision (See Supporting document 3)

Are you  
submitting

Yes

additional material to support your representation?:

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

I want to speak at a public hearing

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 ).:

The inclusion of a proportion of candidate site 331 for residential allocation within Tegryn LDP

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

I wish to be heard in English

NOTES

**CARE's Original Objects** in our organisational rule:

1. The objects of the Society shall be to carry on any business for the benefit of the community by:
  - (a) Establish a low carbon economy within Cwm Arian and its surrounding area.
    - i. Advancing education and raising awareness of energy resource scarcity, and low carbon living;
    - ii. Promoting individual, community and organisational commitment to a reduction in CO2 emissions for Cwm Arian;
    - iii. Energy saving;
    - iv. Establishing the generation of renewable energy at a range of scales;
  - (b) Invest the benefits within the locality.
    - i. Enabling a percentage of revenue resulting from renewable energy generation to be invested in local community projects that meet local priorities as decided upon by the membership.
    - ii. The promotion of sustainable means of achieving economic development and regeneration in order to reduce reliance on fossil fuels.
  - (c) The prevention or relief of poverty in Cwm Arian and surrounding areas by providing: grants, items and services to individuals in need and other organisations working to prevent or relieve poverty.
  - (d) Subject the process to evaluation by our academic partners (energy audit, process and outcome measures) so that our developments and plans can be replicated elsewhere

**CARE's Vision** is to see 'thriving communities, connected to nature and each other, enjoying environments rich in life'

**CARE's Purpose:**

To deliver projects which:

- Build local resilience by supporting the generation and ownership of community resources such as food, energy and materials.
- Develop and/or support local enterprises that share our vision
- Ensure that government decisions address local issues
- Teach skills and ensure there are opportunities to use them in ways that provide resources and improve ecology
- Enhance more healthy habitats that are bigger, better, and more joined up
- Support safe and responsible access outdoors
- Connect our whole community
- Make it easier for people to live in a way that reverses environmental degradation locally, therefore having a positive effect globally







LEGEND(Representative of most common features)

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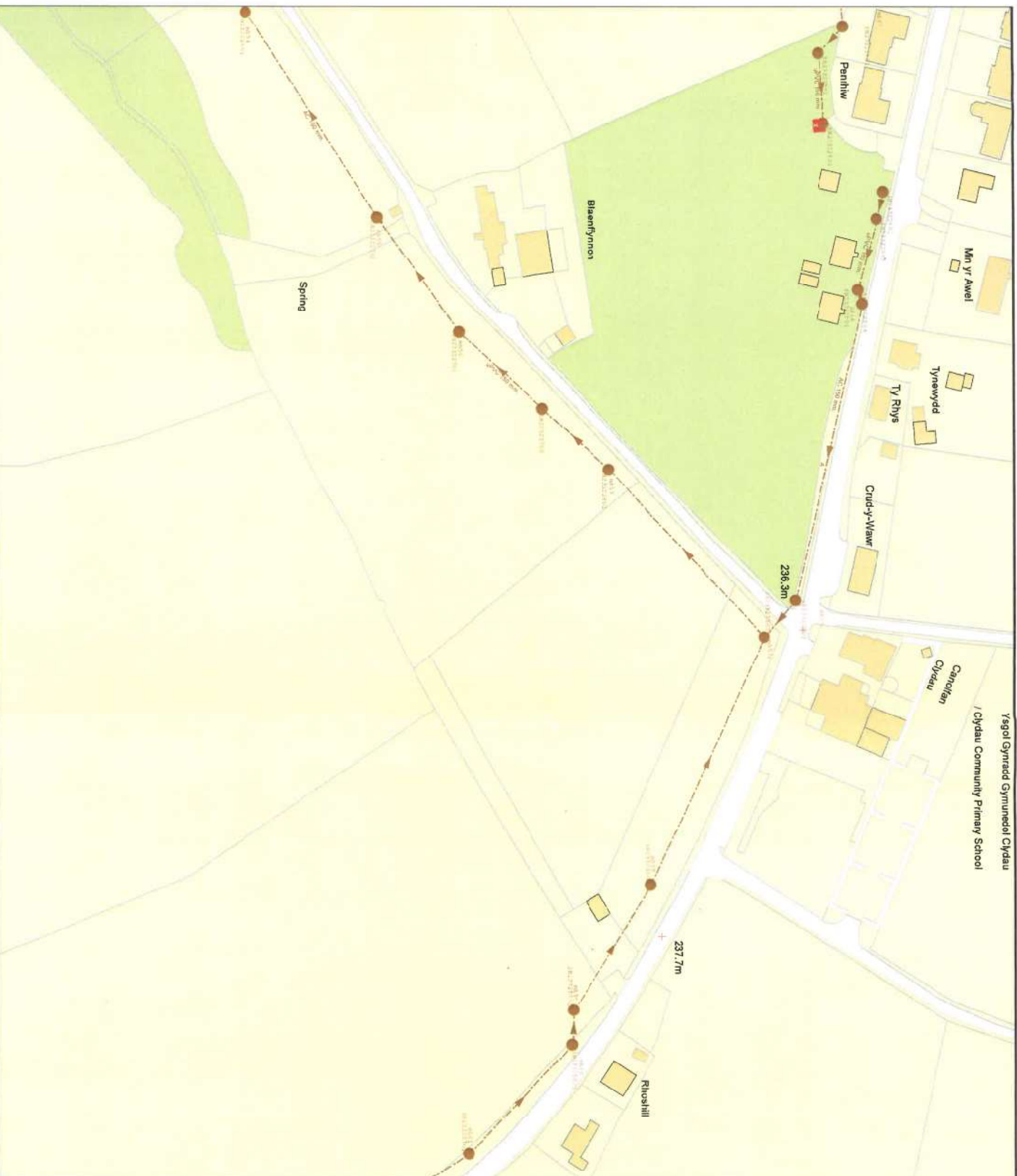
## Notes

Table 1 and Figure 1. After 1-ha, 1-ha<sup>2</sup> and 1-ha<sup>3</sup> treatments, the *gfp* content of T172242 seeds drops to a sensitivity level in some cases (e.g. treatment 12000) but liberates consistent *gfp* signal for 1-ha<sup>2</sup> and 1-ha<sup>3</sup> *gfp* to anticipate and discriminate no *gfp* or *gfp* as nontransmitted *gfp* to transmitters.

EXACT LOCATIONS OF ALL APPARATUS  
TO BE DETERMINED ON SITE.

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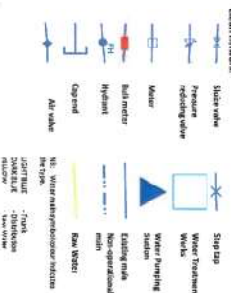




LAND AT GREENHILL TEGRYN LLANFYRNACH  
PEMBROKESHIRE SA35 0BE



### LEGEND



**Notes:**

Public water, recreational water, lakes, or swimming pools are also listed as DCEP<sup>TM</sup> sources. There is a possibility that the same clean public locations (other than swimming centers or public pools) may be found in the database for some DCEP or ECHO<sup>TM</sup> (ECHO<sup>TM</sup> is therefore another name for the provided database of DCEP or ECHO<sup>TM</sup> data). It is therefore possible that the provided database of DCEP or ECHO<sup>TM</sup> data may be redundant and duplicated in part or in its entirety.

**EXACT LOCATIONS OF ALL APPARATUS  
TO BE DETERMINED ON SITE.**

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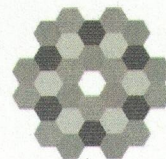




# HM Land Registry

## Official copy of title plan

Title number **CYM339511**  
Ordnance Survey map reference **SN2332NW**  
Scale **1:2500**  
Administrative area **Pembrokeshire / Sir Benfro**



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