

Emma Evans

From: [REDACTED]
Sent: 11 December 2024 09:21
To: LDP - For Enquiries
Subject: Representations on Local Development Plan - HSG/152/LDP2/1
Attachments: Wriiten comments LDP.docx; IMG_4781.jpeg

Follow Up Flag: Follow up
Flag Status: Flagged

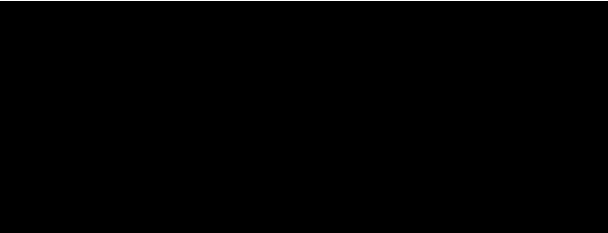
Categories: D Rep

EXTERNAL EMAIL – Exercise care with links and attachments *E-BOST ALLANOL – Byddwch yn ofalus wrth agor dolenni ac atodiadau.*

Please find attached representations. I tried to submit these online, but it would not submit for unknown reason. Comments include:

Location of site
Size and scope of proposed development
Access to development area and public safety
Appropriate service of utilities to proposed site
Ecology and Sustainability

My details are:



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

Given the issues in trying to submit comments, I would appreciate confirmation of receipt.

Kind regards

Steve Cockwell

Emma Evans

From: No Reply - Pembrokeshire County Council
Sent: 11 December 2024 09:10
To: LDP - For Enquiries
Subject: LDP consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep



Pembrokeshire County Council Local Development Plan 2 Deposit 2

DATE 11th December 2024
TIME 9:10:11 AM

Question

Answer

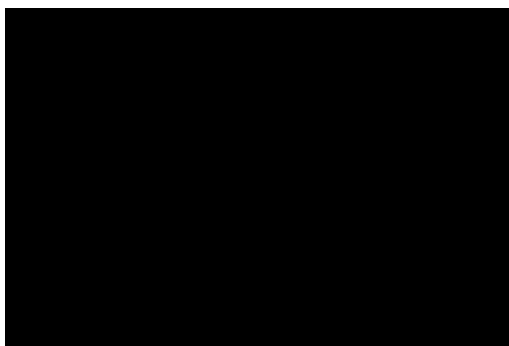
Name: Stephen Cockwell

Job Title: Retired Police Officer

Organisation:

Address:

Telephone Number:



Name:

Job Title:

Organisation:

Address:

Telephone Number:

Main Contact Email Address:



Date:

11th December 2024

Your name / organisation:

Stephen Cockwell

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, Sustainability Appraisal and Strategic Environmental Assessment Report, Habitats Regulations Assessment, Equality Impact Assessment

Other (Please specify):

Policies:

References:

HSG/152/LDP2/1

Selected Features:

Settlement_Monitoring_Reference:152,Settlement_Hierarchy_Position:Service Village,Settlement:Clunderwen,Policy:SP 9,Housing_Market_Area_Band:3
Comments:Please see written attachment for full details, together with photograph of entrance to Bro'r Dderwen. Comments include: Location of site
Size and scope of proposed development Access to development area and public safety
Appropriate service of utilities to proposed site Ecology and Sustainability

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):



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.

HSG/152/LDP2/1

The following comments relate specifically to our household, as well as having wider considerations for the residents of the estate.

Location of site

The development of housing at Bro'r Dderwen, Clunderwen first commenced in 1999. There remain at least 6 plots that have yet to be fully developed, some of which have yet to be placed on market. The site was originally given planning permission and approval for a set number of housing, and planning permissions given on this basis. There was no plan to expand the site at this time and no proposed access into adjoining field. The proposed site, sits outside the village boundary has previously been rejected for inclusion on the Local Development Plan, and the previous reasons for rejection remain valid. To go ahead with this site now, would be inconsistent with other decisions made with no significant change of circumstances.

From an individual perspective, this would have a detrimental impact on the quality of life and on the value of our property. We are currently surrounded on 3 sides from existing properties (or undeveloped plots) and the only boundary we have with no building is to the south of our property, where the proposed site is. If this development goes ahead, we would completely be enclosed and overlooked, affecting our privacy and light. It was also significantly devalue our property as a result.

Size and scope of proposed development

The proposal for 2 phases of housing, totalling 62 new dwellings will more than double the size of the current residential area at Bro'r Dderwen. This will have a detrimental effect on the village, which predominantly consists of much smaller estates or dwellings on the main trunk road that runs through the village. The locality has a high level of Welsh language speakers and further development may erode the character and culture of the village. Transportation links to the village are very poor with a very poor bus services and a heavily disrupted railway, with many trains cancelled. It is therefore considered that the plan would not be effective as intended.

Access to development area and public safety

The access to the proposed site through the current development at Bro'r Dderwen is not safe to service up to another 62 properties. We are already experiencing access issues, due to the lack of suitable parking with many vehicles, including large works vehicles,

being parked on the road. This is particularly acute near the entrance to the estate, as the first phase of housing only provided road parking for one vehicle, which has caused the view to be restricted at this junction on many occasions.

As you enter further into the estate, there is a bend in the road (leading to proposed entrance to new development), which is blind and there has been collisions at this locations involving delivery drivers. There are also vulnerable adults and children who reside in Bro'r Dderwen and vehicle movement for up to another 62 properties, together with construction traffic, poses a significant risk of collision and serious injury.

The entrance to the new proposed site through Bro'r Dderwen is wholly inappropriate and alternative methods of access should be considered and measures to reduce speed of traffic. There have been a number of serious collisions at the cross road junction to the south of Bro'r Dderwen and incidents of speeding and overtaking within the 20mph zone.

The proposed plan is therefore not appropriate.

Appropriate service of utilities to proposed site

There is documented evidence relating to the inability of the current Sewerage Treatment works at Longford Brook, Clunderwen to manage waste, resulting in the release of phosphorous into the East Cleddau river, which is an area of special interest primarily for important populations of otter, as well as other endangered species.

https://naturalresources.wales/media/668449/SSSI_2644_Citation_EN001d2b6.pdf

There were 41 reported spills in 2023, with monitoring only occurring 33% of the time, with over 162 hours of major spills. The site is subject of enhanced monitoring by Welsh Water and residents have seen the effects of sewerage spills for themselves. Many residents, including ourselves have experienced drains being blocked within the estate.

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-anddevelopment/our-role-in-planning-and-development/phosphorus-limits-onenvironmental-permits-for-waste-water-treatment-work-discharges/?lang=en>

Residents are aware that planning applications for existing plots have been delayed at Bro'r Dderwen due to the inability of the Water Treatment works to cope with extra demand and we have not received any assurances that the matter has been addressed, let alone have the ability to cope with another 62 dwellings. Welsh Water have a poor track record in managing these spills and further assurances are required, particularly if regulations are going to be tightened further. It is therefore considered that there are not appropriate services available to the site.

Ecology and Sustainability

The proposed site is a greenfield site, used for agriculture, which has included sheep and cattle grazing on the land, as well as harvesting grass and silage. A report from Audit Wales in January 2024, highlighted that sustainability is central to Welsh planning policy and with greater levels of demand being placed on natural resources, national and local government need to balance addressing demand with environmental protections

Once developed, land is unlikely ever to be converted back to greenfield use and its loss can devastate natural habitats. For agricultural land, there is also an impact on food production and its associated employment. Consequently, Welsh Government promotes the use of previously developed land and repurposing of empty buildings, wherever possible. The proposed site is in conflict with this policy and does not fit, as highlighted in your 3 tests.

<https://democracy.gwynedd.llyw.cymru/documents/s500009373/Appendix%201%20%20Report%20-%20Sustainable%20development%20-%20Brownfields.pdf>

Previous attempts for the proposed site to be included on the Local Development Plan have failed due to ecology issues, and the loss of hedgerow and habitat. We personally have a boundary hedgerow, which has been maintained, but this will likely be removed for fencing if a development is progressed.

There has not been any significant change in the ecology factors to change the decision making in relation to the proposed site. The proposed plan is therefore in conflict with previous decisions made based on ecology.

In addition to the impact on the Eastern Cleddau river, as detailed below, there is a wide range of wildlife that are present in hedgerow or within the field, which includes garden and migrating birds, birds of prey, small mammals, amphibians, insects and bats. The loss of this habitat will have a detrimental effect on wildlife including endangered or protected species. It does not appear that a full impact assessment has been made specifically in relation to this site.

<https://www.pembrokeshirecoast.wales/planning/planning-advice/protectedspecies/bats-and-planning/>

