

Pembrokeshire County Council Local Development Plan 2 Deposit 2

DA

Date:

| TE 16/12/2024 ME 3:48:57 PM | |
|--------------------------------|--------------------|
| Question | Answer |
| Name: | Huw LLewelyn Jones |
| Job Title: | Retired |
| Organisation: | N/A |
| Address: | |
| Telephone Number: | |
| Name: | |
| Job Title: | |
| Organisation: | |
| Address: | |
| Telephone Number: | |
| Main Contact Email Address: | |

Your name / organisation:

Huw. Jones

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 that the procedural requirements have not been met

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

Other evidence base report (Please specify below)

Other (Please specify):

Procedure, Justification, Access, density, traffic, environment,

Policies:

SP9, GN16,SP9, G

GN16,SP9, GN16

References:

HSG/152/LDP2/1,HSG/152/LDP2/1,HSG/152/LDP2/1,HSG/152/L

DP2/1,HSG/152/LDP2/1,HSG/152/LDP2/1

Selected Features:

Manually entered Comments: Identified housing need for 6

houses has been exceeded

Selected Features:

Manually entered Comments: No new jobs identified in "Travel to Work " range. Reason houses will be needed is unexplained

Selected Features:

Manually entered Comments: Utilities (Water and sewage) already

at full stretch and showing signs of overload

Selected Features:

Manually entered Comments:Size of site out of proportion to

village. Threat to Welsh language

Selected Features:

Manually entered Comments:Proposed access to main road through narrow roads of Phase 1 and 2 will create dangerously

excessive traffic between existing houses and restrict flow along main road

Selected Features:

Manually entered Comments:disturbance to abundant wildlife and to rare species nearby. Any consequential workat sewage works risks destroying valuable habitat

Selected Features:

Manually entered Comments:Loss of view. Loss of essential privacy for disabled person, and consequential loss of property value to homes buil during Phase 1 and 2. Effect on mental health on me, and particularly on those who ave been living on a building site for 20 years

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 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).:

Housing site at Bro'r Dderwen Phase 3 and 4 (south of Clynderwen)

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

Planning Consultation Bro'r Dderwen

18 Nov 2024

Introduction

This a response to circular received a few days ago. The order of subjects is the same.

"Knowledge" added is mostly from Google, and "Standards" cribbed from other local authorities, e.g. Bradford, Reading etc.. (Pembrokeshire doesn't seem to publish any.) Calculations based on these standards are rough. I think that they do represent what I say they do but could probably be refined. Planning "Occupancy" of houses (3 per house) probably underestimates many of the houses.

I hope this is as helpful as I hope it might be. AT least it adds flesh to the talking points.

This is essentially an unedited first draft.

1) Short notification period

I have just heard about this consultation, which apparently started nearly a month ago and which potentially will materially affect my property and family. A consultation is not a consultation if the sides don't speak to each other, There has been no notification of any kind from the council, so I suspect that what I have heard is just a groundless rumour.

However, I must emphasise that regardless of correct procedure it is extremely bad manners to change the conditions of a person's life without telling them first, and probably contravenes books of International human rights laws.

2) wildlife

Over the last 2 years I have identified 32 species of bird in our garden with 3 more that I hope to confirm. I have heard Stonechats (which seem to be rare in this area of the county) calling in the spinney between the sewage works and Llanfallteg Lane.

(In order of appearance: Jackdaws, Starlings, Red Kite, Buzzard, Peregrine, House sparrows, Gold Finch, Robin, Dunnock, Collared dove, Black Bird, Herring Gull, Blue Tit, Song Thrush, Sparrow Hawk, Swallows, Magpie, Wren, Great Tit, Wood pigeon, Rook, Pied Wagtail, Greater Spotted Woodpecker, Redwing, Mistle Thrush, White Throat, Tree Sparrow, Bullfinch, Coal Tit, (Willow Tit), Wheatear, (Read Bunting)

Species underlined believed to live in hedges. Woodpecker definitely lives in spinney by sewage works but comes regularly to nut feeder. Sparrow hawk has made several kills in the garden. Collared doves, magpies, rooks etc are regular visitors

3) Environmental impact

Run-off. I have observed on numerous occasions how sensitive to runoff the "River Grondre" is. Two branches meet just above the bridge near Longford Farm, House. The Southern branch usually remains crystal clear. But the one flowing from the East is often discoloured. Sometimes there is the salty smell that I associate with sewage, while at others it has a brown earthy colour which I gather comes from the by-pass construction work.

See later sections of details. But the likely carbon footprint of people commuting from these new houses is likely to be significant. Unless roof mounted solar panels can power built-in domestic car chargers. (Having to pay to commute, my prevent people upgrading to EVs)

Sewage generation may be significant, and cause even more discharges.

Kerb-side refuse and recycling system is already under pressure. Promised replacement blue box as not been supplied for almost 6-months in spite of repeated reminders. Probably difficult to cope with extra houses.

4) Loss of View and loss of privacy.

I have worked in farming all my life and a view of fields has been important to my mental health as I struggle to adapt to an urban life.

Loss of property value will certainly follow any interruption to the view. If we were ever to move from here the view would be a major selling point. But I guess my children will have to take the cut after we have died.

Loss of privacy will undoubtedly be the case, but I am worried that new neighbours may be disturbed by the antics of our severely disabled son, who is inclined to shout and scream, or throw things about if he is upset. He is also going through a phase of removing all or some of his clothes at odd times. He also likes very loud music which is essential to keeping him calm. New neighbours will have to get used to loud Christmas Carols all year round, for example. (We try to get him to use headphones, but he has destroyed three sets

in about 2 months recently. (It took us two years to find a suitable property that would, among other things, have minimal effect on neighbours.)

5) Impact on infrastructure

Sewage.

As in para3, I have often smelled discharge from the sewage works coming down the river. Standard allowance for sewage from new houses is 150l per person per day. That means that houses with 3 people will generate 450l per house per day. But standard allowance for heavy use days and extra rainwater brings this to 1,215 litres per house per day. Phase 1 and 2 together means that the sewage works must have the capacity to process an extra 75,330 litres per day. That is just over 75 tons.

Water supply.

We have frequently reported foul taste and sediment in our water supply. While Dwr Cymru have been very good at attending to problems (and identifying some bacterial contamination requiring hours of system flushing), I suspect that we are suffering from being at the end of the line, which means that we tend to get all the problems coming from upstream. New users downstream of us may improve our situation but it does not promise well for new residents.

Electricity

There appears to be no problems

Broadband

subject to frequent short breaks in connectivity, suggesting limited of capacity in local/exchange servers

6) Impact on Traffic.

Especially turning right into Bro'r Dderwen. I understand looking at guidance for similar situations in York, and I think Bradford, that if the proposed 31 new homes are built, (and bearing in mind the extra use of cars in a rural area) that traffic will be such that an "Island right turn lane "will be required. The road will have to be widened to accommodate that. This would certainly be the case if 60 houses were built, even with urban levels of car ownership, presumable with buses running when and to destinations that residents needed.

Better public transport might reduce traffic, especially if services were timed to reduce commuting. And with intermediate services to (and from) local shopping centres with return journeys timed to allow tasks to be completed. One way public transport won't work

7) Access limitations within Bro'r Dderwen.

Minimum width required for fire engine is 3.7m.

The entrance onto the estate narrows down to 5 m within a car length of the main road. Road width, especially on bends, is often inadequate for two modern cars to pass without one backing to allow the other to clear the bend. (Cars were narrower 20 years ago) Fuel delivery tankers often have to block the road to cars completely, while they fill their customers' tanks. (They too are getting bigger.)

Any vehicles parked in the 5 m section may make it difficult for a fire engine to enter the estate, without crossing the pavement and perhaps gardens. If cars park partly on the pavement on wider, straight sections of the road there is no problem with fire engine access. If people are more law abiding, then there might be

If a large delivery vehicle, or someone is towing a trailer, is leaving the estate, cars turning into the estate must wait on the main road until exiting vehicles have gone. While the estate has off street parking for most houses some do not, and there are at least three disabled people living on the estate, whose carers often have to park in turning areas or on the road (Or blocking the pavement which causes problems for other less able residents.) Our house, for example has 5 cars to accommodate during most days, and more when Social Services or Respite providers visit. Then we have ordinary visitors, deliveries etc. That is without extra vehicles from the new houses.

If the new houses have inadequate parking, then there is a risk that extra cars will block access to existing houses.

We need to check road widths, but I suspect that we are near capacity of existing roadways already.

8) Unacceptable level of traffic.

There are 3 disabled people, and children from 2 to school leaving age. Traffic around the estate is not excessive now, and I know of no worrying incidents (though I have twice been surprised by electric vehicles remaining unnoticed until quite close).

Clearly the traffic through the estate while 30 houses are built has many risks. At the very least mud on the road could be very hazardous. But we must think about the pressures on workers to meet deadlines, and to deal with delivery or equipment failures, while sticking to schedules and making the most of good weather. There is a clear risk of hurried movements through the estate.

In normal use, using the Ministry of Transports national average of 1.2 vehicles per house, and moderate levels of deliveries we can expect 31 houses to generate something in the region of 223 trips through the existing estate every day. But Bro 'r Dderwen is a rural estate that Government estimates suggest may double that number That is about 12 extra trips (See Table 2) per hour for the 18 hours that most people are awake every day. If we accept that most trips will between rush hours i.e. between 8.00 am and 6.0pm that is over 22 extra trips per hour. On the same basis 62 houses would generate almost an extra 2 cars per minute. Not only would this be unpleasant for residents of the existing estate, but it would also significantly slow traffic on the main road.

Table 1; Estimating extra traffic

| | National <i>A</i> | verage URI | BAN | National Average RURAL | | |
|------------------------|--------------------|------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| | Existing 56 houses | Phase1 31 houses | Phase 2 62 houses | Existing 56 house | Phase 1 31 houses | Phase 2 62 houses |
| No. cars | 67.2 | 37 | 74 | 134 | 74 | 148 |
| No of trips | 3 | 3 | 3 | 4 | 4 | 4 |
| Car movements | 6 | 6 | 6 | 8 | 8 | 8 |
| Total Car Movements | 403 | 222 | 432 | 1,075 | 592 | 1184 |
| Deliveries | 1 | 1 | 1 | 2 | 2 | 2 |
| TOTAL | 404 | 223 | 433 | 1077 | 593 | 1186 |

It looks likely that Phase 1 would increase traffic movements onto the main road by 50%, Phase 2 would double traffic. This would make emergency service access on the estate

less predictable, and significantly slow traffic on the main road especially at busy times of day

Estimating traffic flows

Table 2: Estimating traffic flows

| | | National Average URBAN | | | | National Average RURAL | | |
|---|---|------------------------|-------------------------|-----------------------------|-------|------------------------|-------------------------|-----------------------------|
| | | Existing | Existing +Phase 1 | Existing + Phase 2 | | Existing | Existing +Phase 1 | Existing + Phase 2 |
| Α | No, Houses | 56 | 87 | 118 | | 56 | 87 | 118 |
| В | No. Cars (Ax1.2) | 67.2 | 114 | 142 | (Ax2) | 112 | 174 | 2367, |
| С | No. of journeys | 3 | 3 | 3 | | 4 | 4 | 4 |
| D | No, of movements (C x 2) | 6 | 6 | 6 | | 8 | 8 | 8 |
| E | Total movements per day (AxD) | 336 | 522 | 708 | | 448 | 696 | 944 |
| F | Movement rate / hour in 18hrs (E/18) | 19 | 31 | 39 | | 25 | 39 | 52 |
| G | Movement Rate /hr in10hrs (E /10) | 34 | 52 | 70 | | 45 | 70 | 94 |
| Н | Movement Rate/hr in Rush Hour (E x 0.15) | 50 (40) | 78 (62) | 106 (84) | | 67 (60) | 104 (94) | 141 (127) |

9) Out of proportion to size of village

Population of Clynderwen is about 1000.

Potential additional population

Phase 1 (at 3 / house) is 92

Phase 1 and 2 (at 3 / house) is 186

Phase 1 is roughly 10% of the population of the village, which is line with observed UN figures for urban growth.

Phase 1 and 2 together at 20% vastly exceeds this. It is not unheard of but there is usually a pressing local reason for this kind of growth. While there may be a reason for more houses in areas of industrial growth, Clynderwen is not obviously such a site.

Can local facilities accommodate this increase?

Electrical, water, sewage, gas (what gas?) oil delivery, LPG delivery.

Electric supply seems OK. But it appears that the supply is by cables on wooden posts, whose height makes them vulnerable to falling trees in bad weather

Water shows early signs of over stretch. (See earlier section describing sediment and bacterial infection)

Sewage needs more capacity.

Oil delivery. There is a choice of good suppliers (some not so good), prices not competitive with mains gas. LPG likewise. As we approach Net Zero, houses depending on fossil fuels may become unsustainable. At present there is no obvious way of piping or transporting alternative fuels (green hydrogen?) to rural houses. (Using hydrogen for heating would be very similar to old town gas systems, but "natural gas" was said to be very much safer.

Building maintenance services

Some good workers in the area, not always easy to find, and the best have a waiting list

Highways department can it afford to maintain extra estate roads? Reportedly struggling on main roads

School places? Good schools if children can get to them. School buses available, but will need other transport for doctors' appointments etc, during school day. All a car journey away. Capacity?

Doctors' surgeries? Narberth, Crymych, (Whitland) etc. All a car journey away. Capacity in Narberth and Whitland s said to be exhausted

Hospitals? Withybush, Glangwilli. Both excellent. All a car journey away. Capacity? These hospitals are due to be replaced and downgraded, but plans seem very uncertain at the moment

Shops? Only a small convenience store here

Ladds Builders merchants

Clynderwen farmers

Hairdresser

Forge

Pubs and restaurants? Only the Iron Duke here.

Entertainment? Community Hall

Sports? 1 pitch

Play areas? swings, cycle track both for age range 1 to 10

Garage and repair? PL Sports, VW group

Transport Bus and train network? Request stop only for trains. No ticket sales.

Bus stops, not used?

Footpath (pavement and cycleways) network? Pavement to Llandysilio

No safe path to Narberth

Footpaths and bridle ways? Path to Llandewi Velfrey barely useable. Llanfallteg lane OK to walk with care. Not for unaccompanied children. Path from Gower Villa Lane moderate walking, as far as I have got. Lanes to Bethesda OK with care. Not for unaccompanied children

10) Boundary of village?

Seems to be flexible, and expanding, but lack of definition may cause problems in future

Permanent state as a building site.

The lack of a formal boundary to the village suggests that building could continue forever, perhaps until it merges with Narberth. That could cause never ending misery for existing residents, and ever-increasing pollution from commuting. There seems to be no plan to upgrade the sewage works or water supply and other utilities for this situation. And no plan for local employment. The health Board does not seem to have been told.

Construction of Bro 'r Dderwen has already been going on for two decades, and original house holders are justifiably annoyed that there seems to be no end of disruption (and mud) from construction traffic. For more recent occupants this state of affairs is very disappointing. The rural nature of our new properties is limping away, leaving nothing but regret and uncertainty, not to mention annoyance as we are periodically imprisoned by construction vehicles doing necessary jobs to even newer properties.

11) Employment

There is none here. Every new house will be occupied by commuters. A few will find jobs in Narberth, but the majority will be commuting to Haverfordwest or Carmarthen, an average distance of 35miles a day. The new Freeport at Milford Haven and Neath may attract some workers, but commuters to either would face urban bottle necks should hoped-for opportunities emerge. The majority will be housed south of Haverfordwest or East of Pont Abraham

Commuting

Using that as a basis, Phase 1 breadwinners will each have to earn an extra £2940 and between them will commute a combined total of 26,040 miles per year.

Effect on climate change

At 404 grams CO₂ per mile that will add over 10 tons to the County's CO₂-emissions. If phase 2 is built that will increase to nearly 21 tons. If more than one person per household commutes to work, that will of course increase. It makes sense while we are trying to control climate change, to provide employment before building houses.

12) Loss of Welsh Language

My Grandfather was one of the first teachers, in 1906, to be allowed to teach in Welsh Medium. Most of his children, also taught Welsh. The language is very important to me, but my father had to go over the border to find work, so I grew up in an English-speaking

community. At times (in school) it was positively dangerous to even have a Welsh name. Needless to say, the Welsh I learned as a young child faded, and what I remember now is so old fashioned as to be useless. But I still love to hear Welsh spoken even if I often don't know what is being said. (Tutting about incorrect sub-titles can still be fun though). Welsh is an immediate link to my childhood, and to dear and much missed relatives. But I have come into a new house on the estate. I represent a loss of Welsh, (even if my grandchildren are bilingual). But I am not unique. An influx of monoglot English speakers would be a threat to "my" language. I am not totally against all English people, I have good friends over the border too and working as a kind of Scientist a couple of decades ago, I really valued the international cooperation of my colleagues. Putting different experiences together is nearly always beneficial. But perhaps building houses at a rate where local people can form the majority of residents on the new estates will help preserve our language and culture and preserve the "Difference" that makes Pembrokeshire such a good tourist destination. If we really do become "Little England", why would people bother to visit?

It has ben pointed out to me that many local people cannot afford to buy a new house, so perhaps it is better to limit building to one new house at a time, specifically designed to be affordable, and perhaps upgradable over time. AN estate might be in the plans but filling it with houses may take a very long time. Perhaps building pairs of houses, one affordable, and one "commercial" may generate the mixed estates of 70years ago, that were so beneficial to community coherence.

13) What type of Residents will the new buildings attract?

AS mentioned above, there is little or no employment here. The likely residents will fall into the following categories: -

Workers in primary industries like @arming, @brestry, quarrying etc

May be put off by limited access and restricted parking and manoeuvring space for larger vehicle. Pricing might make the estate unattractive for younger workers. Not many farms employ workers these days, and those that do may be hit by inheritance tax changes

Transport workers, lorries, buses, rail

as above

Commuters

may be put off by narrow access to estate acting at bottle necks at busy times, and fear of waking neighbours when going to early or late shifts. Distance from shops and other facilities might deter people suffering hours of commuting every day

Second homes

bought by people looking for high quality local services. Probably prefer coastal sites or sites adjacent to good paths etc. House remains empty for much of the year.

Rental

Occupied on temporary basis, may not be well looked after. Unsettling for neighbours when tenants change. Frequent visits of removal vans adds to traffic congestion on the estate.

Retired

Often require adaptions to ease access, parking for cars that can carry wheelchairs, may be more sensitive to noisy neighbours. As health declines and more of their pension is used on survival, care of their property may decline especially if expensive maintenance is required. Gas mains supply could considerably reduce heating costs, but not available here. People over 80 will be totally reliant on public transport, home deliveries and home visits from medical staff. Most of these facilities are missing or inadequate.

The last three categories, and long-distance commuters are service using categories, rather than service providing. House users in these categories will be able to provide little to the community and what they do provide is likely to be transient. Apart from people (like us) with family living in the area, I can't really think who these houses are for.

14) Overwhelming the local community

62 houses, which if they are like ours with 5 bedrooms have the potential to house 10 people each making a total of 620 people, and the proposal is to build them in a village with a population of 1000? This is madness.

We were actually looking for a medium sized bungalow, but houses are not built for peoples' needs, and you have to accept the most suitable of the houses on offer. Generally, there are 3 permanent residents in this house, plus sleep over carers 2 nights a week, and intermittent respite care for our son which reduces the population to 2. When family are staying numbers do of course go up, and sometimes there may be 8 or more for a weekend or short stay. Very difficult to say how many people will occupy a house, and those who have been students will be aware of much fuller houses than ours, at times.

Most of the time I use an average of 3 people per house in my calculations. So, 3 x 62 is 186. That is still nearly 20% of the population of the village (1 in 5) and is bound to change the character of the village. An estate, working together on a project could certainly achieve things that the rest of the village doesn't like, and being at one end of the village is to some extent an isolated population. Clynderwen has come a long way since Narberth Road was

just a railwayman's dream and one or two houses were home to railway workers and employees of the mineral industry. It would be a pity to spoil it.

15) Housing Need?

The suggested need from the County plan was for fewer than 6 houses. 2 new houses are at present being constructed on the existing part of the estate. So, the County suggests that there is a need for 4 houses in Clynderwen. But I am told that there are several houses in the village that have been for sale for some time. People aren't exactly fighting to live here. Wasting resources to build houses that will stand empty, maybe for years, is not exactly wise use of resources when we are supposed to be worrying about climate change. (Storm Bert is making its presence felt as I write and in Whitland, has already knocked the chimney off my younger son's neighbour's roof, which has resulted in water running down my son's walls. New houses may provide Bro'r Dderwen with a bit more shelter, which may be welcome, but 62 houses, with apparently no likely occupiers is not sensible.

This is high density housing, such as may be acceptable in inner cities, but hardly attractive to new buyers who will have to pay out £3,000 a year to commute, before paying their mortgages. Where is the sense in that? Are there even jobs in Haverfordwest, Carmarthen or Cardigan that can pay the cost of commuting? My son in law is a University Lecturer and I know that he and my daughter are struggling to maintain an old 4-bedroom house in Whitland while commuting to Carmarthen. They both work.

16) Effect of house values in original estate

The continuous passage of construction traffic through Bro 'R Dderwen for the next 20 years, will reduce people's enjoyment of their own homes. Mud and vibration may block drains, cause flooding and subsidence and damage structure. The apparent deterioration of the estate will deter potential buyers of the new or existing houses. House values will drop. If that happens, so will the reputation of the state, and that will slow sales even if demand for housing here miraculously increases. People will choose to go to Llandysilio, or Narberth, both of which have better facilities, although Llandysilio lacks a railway station.

17) Stop press

Cleddau Project: Report 7th Nov 24, notes progress, but that sewage spills regularly reported into the Grondre, presumably from the works that is only 300yds from the proposed building site. it appears not to be ready for more houses.