



Pembrokeshire County Council Local Development Plan 2 Deposit 2

DATE 15/12/2024

TIME 3:27:10 PM

Question	Answer
Name:	Caroline Rone
Job Title:	Resident
Organisation:	
Address:	
Telephone Number:	
Name:	
Job Title:	
Organisation:	
Address:	
Telephone Number:	
Main Contact Email Address:	
Date:	

Your name / organisation:

Caroline Rone

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):

BIODIVERSITY FLORA & FAUNA - destruction of hedgerows, ECONOMY - few job opportunities, WATER & SOIL - sewage spills into local tributary of eastern Cleddau at Grondre, HUMAN HEALTH - already overcrowded health centres, EDUCATION & SKILLS - no school, few job opportunities, TRANSPORT - no choice other than to travel by car, SOCIAL FABRIC - erosion of the Welsh language,

Policies:

GN16

References:

HSG/152/LDP2/1

Selected Features:

Manually entered Comments: The proposed development is unsound for the following reasons: LOCATION & ACCESSIBILITY - off busy A478 BIODIVERSITY FLORA & FAUNA - destruction of hedgerows, ECONOMY - few job opportunities, WATER & SOIL - sewage spills into local tributary of eastern Cleddau at Grondre, HUMAN HEALTH - already overcrowded health centres, EDUCATION & SKILLS - no school, few job opportunities, TRANSPORT - no choice other than to travel by car, SOCIAL FABRIC - erosion of the Welsh language,

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
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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

Head of Planning
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Dear Sir/ Madam

Re: HSG/152/LDP2/1 site ref: 340 south of Bro'r Dderwen, Clunderwen, SA66 7NR

It has been brought to our attention, by word of mouth, that the above site is the second phase of deposit 2 of the local development plan.

We understand that there is a requirement by the Council to assess potential sites for their suitability, but it is our opinion that development of the above site is wholly inappropriate for the location in the village.

According to the 2021 census, there are approximately seven hundred people living in Clunderwen. There is one convenience store, a chemist, a farming supplies store and a farming hardware store. There are very few opportunities for employment, no school and no facilities for commuting other than the 'flag the train down' railway station with a small, sheltered seat for no more than four people on the northern platform. The proposed development sits outside the village boundary and was previously rejected for inclusion in the LDP, the reasons for rejection remaining valid.

Road Safety

The entrance to Bro'r Dderwen sits on the busy A478, at the start of the twenty mile per hour zone, on a blind bend. The traffic does not adhere to this speed, with cars frequently overtaking along this section of road, both entering and exiting the village. It is my understanding that this is likely to be the entrance into the proposed development, should it go ahead. There is no way that this entrance is suitable for a development of potentially sixty-two properties over two phases. The road into the estate is not wide enough for two cars, especially when there are properties in phase one of the development with single car driveways, who must park their second or third vehicles on the roadside/pavement. Most current homes in Bro'r Dderwen are two car families, some with three or four cars. If the potential sixty-two properties are two car families only, this places at the very least another 124 cars using a narrow roadway and junction onto the busy A road.

We are extremely concerned about the safety of pedestrians. There are many children who walk to the playing field or to catch their bus every morning at around 8.15a.m. and return at around 4p.m. This is around the time that most residents leave for work each day and part-time and shiftwork residents return. In the interim, if the potential development were to proceed, there will be noisy, dirty construction traffic using this far too narrow entrance and road through the estate. There is also a tight bend in the phase 2 development, making it a dangerous area for increased traffic. Most people in the potential properties will have to commute to work and to schools with

their younger children as there are, as already stated, few chances of employment in the village and no school. If just one person from each property leaves and returns by car each day, this will add a minimum of thirty-one cars using the junction from the site. There are vulnerable and partially sighted residents who will struggle with the added volume of traffic and to cross the roads if they are to continue to be part of and use the village facilities.

Pollution

There is also the issue of pollution and its detrimental effect on health. According to WHO *'exhaust emissions are an important source of traffic-related pollution, and several epidemiological and toxicological studies have linked such emissions to adverse effects on health. Road abrasion, tyre wear and brake wear are non-exhaust traffic emissions that become relatively more important with progressive reductions in exhaust emissions. Toxicological research increasingly indicates that such non-exhaust pollutants could be responsible for some of the observed adverse effects on health'* <https://www.ncbi.nlm.nih.gov/books/NBK361807/>

Options

If the proposed development is to go ahead, we would hope that an alternative entrance would be found to the south of the site along the Llanfallteg road, or the entire plan revised and if it must be Clunderwen, an alternative site considered in the village within the 20mph zone. This is where traffic has slowed to a safer speed. Sites to consider include:

- Land south and west of Golwg yr Eglwys
- Land west of the A478
- Land to the north and east of Heol y Gaer
- Land north, south and east of Gower Villa Lane
- Land to the north and west of Bro Waldo.

Continuous construction

Bro'r Dderwen has been a construction site since the 1990's. There are many residents that have lived here since the late 1990's and early 2000's. There has been continuous construction work throughout this period and now the potential of a further 5-10 years disruption of noise and heavy traffic. This equates to a huge negative effect on amenity.

Wildlife

There is a diverse array of wildlife visiting our gardens, as we sit so close to nature being on the village boundary. We have had in our garden a myriad of birds from sparrows to woodpeckers, hedgehogs, voles, moles and in the evening, bats. We see Red Kite on a daily basis, dipping into the field behind my garden fence to catch their prey. We would argue that a full impact assessment has not been undertaken in relation to this proposed development

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

If the proposed development were to go ahead, are there guarantees in place that the ecology and biodiversity will not be interrupted?

Sewage

Residents have witnessed sewage overflows into the stream at Grondre. This is a main tributary to the Eastern Cleddau. The Cleddau Project have worked tirelessly while *'aiming to provide a coordinated, strategic approach to improving the Cleddau from source to sea, returning the tributaries, brooks, rivers and estuary to good health for the benefit of nature, the community and future generations'* <https://thecleddauproject.org.uk/>

There have been no guarantees from Welsh Water that it will have completed any upgrade to the treatment works to avoid sewage spills by 2030, only an expectation.

Right to light

As a resident of one of the homes that back onto the proposed phase four development, these properties have enjoyed full and uninterrupted light through south facing windows for a period in excess of 20 years. We argue that these properties have acquired the right by prescription, to continued full, uninterrupted light. Section 3 of the Prescription Act of 1832 details specific arrangements for claims to the use of light, as follows:

'When the access and use of light to and from any dwelling house, workshop, or other buildings shall have been actually enjoyed herewith for the full period of twenty years, without interruption, the right thereto shall be deemed absolute and indefeasible'

<https://www.legislation.gov.uk/ukpga/Will4/2-3/71/section/3>

Renovating vacant homes over new builds

According to the ONS, *'at the end of 2021 10.9% of all properties in Pembrokeshire were truly vacant'*. This figure does not include holiday lets or second homes.

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/numberofvacantandsecondhomesenglandandwales/census2021#truly-vacant-dwellings>.

Options

As the Welsh Government is offering grants of up to £25,000 per property for renovation purposes, would it not be more sensible to repurpose the current empty housing stock over the cost to the environment of new build homes? <https://www.gov.wales/apply-empty-homes-grant>

Finally, we would like to draw attention to the document:

4th Edition of Delivery Agreement July 2024, section 3.7 Principles of Community Involvement, which is available on the LDP Review webpage <https://www.pembrokeshire.gov.uk/local-development-plan-review/delivery-agreement-including-the-community-involvement-scheme>

Our comments are in **bold**.

'The Council has identified some basic principles for community involvement. All consultation will be carried out with these principles in mind.

- *A culture of engagement - People should know that they are welcome to take part in the planning process and that decision makers are really interested in their views. – If this is so then why have residents not received invites in writing to take part from the beginning?*

- *Frontloading* - The community and stakeholders should be involved from the earliest stages of plan preparation. - **Again, why have residents not been informed in writing?**
- *Reaching out* - Methods used to encourage involvement should be appropriate to people's experience and needs. – **What methods have been used to encourage community involvement other than a notification in the Western Telegraph?**
- *Fit for purpose* - The types of consultation used should be suitable for the group being consulted and the issue being discussed. The Council will ensure that the views of the community as to the most appropriate techniques for engagement are considered. – **At no stage have residents been asked an opinion.**
- *Continuing involvement* - The community should continue to be involved throughout the process of preparing the Replacement Local Development Plan and related Supplementary Planning Guidance. – **How is the community to be involved if it is unaware that the plan exists? This is a little late now that the LDP is in the late phase of decision making.**
- *Clarity and transparency* - The planning process should be clear, so that people are able to participate in a timely and effective manner. - **Again, residents should have been informed in writing at every stage.**
- *Formal representations* - There will be consultations which will provide opportunities to respond to the Council's formal proposals. These are statutory requirements, set out in Regulations and representing the minimum in terms of community involvement. - **Again, residents should be invited in writing, otherwise no opportunity exists.**
- *Member Involvement* - It is important to involve elected Members of the County Council at all stages of plan preparation, starting with an evaluation of how well or otherwise the existing plan is working and including the drafting of the Replacement Plan. - **The council member has made no attempt to involve the community, kept noticeably quiet and has up until the last week, been disinclined to become involved. One would have hoped that they would have ensured that affected residents were aware of the Council's plans at the earliest stage. Not good enough.**
- *Feedback* - Feedback will be provided to stakeholders after each consultation stage. - **Again, we have been kept in the dark and received nothing in writing.**
- *Conflict resolution* - Some issues are very difficult to resolve but hopefully a consensus will emerge about the issues the LDP will address and the options that exist. The Examination of the Plan will APPENDIX A 28 provide opportunities for the Council and representors to discuss important and / or contentious issues with an independent Inspector. The Inspector will be able to make recommendations that will be binding on the Council, which must adopt the Plan in the manner that he or she directs. - **Will the residents, as stakeholders be included in this and kept notified in writing?**
- *Inclusiveness* - effort will be made to seek views from a cross section of interests, including those who have not traditionally participated in plan making. - **There has been no inclusiveness for residents/stakeholders whatsoever.**

Does the council consider that placing a notification in the Western Telegraph, is sufficient in fulfilling its obligation to involve its stakeholders? We consider this an inefficient way of communicating considering current readership figures and we quote '*The newspaper was the*

highest selling weekly title in Wales, averaging 25,627 sales during the second half of 2007. As of 2023, its readership stands at 4240' https://en.wikipedia.org/wiki/Western_Telegraph

We propose that going forward and if the proposed development proceeds, that the Council shall be fully transparent and will communicate in writing to all residents of Bro'r Dderwen, at **every** further stage of consultation and decision making.

We look forward to receiving your comments in due course.

Yours sincerely

REDACTED

Caroline and Jonathan Rone

