



Pembrokeshire County Council Local Development Plan 2 Deposit 2

DATE 10/12/2024

TIME 5:10:09 PM

Question

Answer

Name: Residents of Bro'r Dderwen

Job Title:

Organisation
:

Address:

Telephone
Number:

Name:

Job Title:

Organisation
:

Address:

Telephone
Number:

Main



Contact
Email
Address:

Date: 10/12/2024

Your name /
organisation
: Residents of Bro'r Dderwen

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
requirement
s.:

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:

Other
(Please
specify): Suitability of proposed site

Policies: GN 16

References: HSG/152/LDP2/1

Selected
Features:

Site_Name:South of Bro'r
Dderwen,Settlement:Clunderwen,Minimum_Units_In_Plan_Period:31,Affordable_Housing_Requirement_Percentage:25,Affordable_Housing_Requirement_Unit_Number:7,Units_Beyond_The_Plan_Period:31,Area_HA:2.71,Potential_For_Self_Build:No,Dwellings_Per_Hectare:23,Candidate_Site_Reference:340,Housing_Component_Type:Residential Allocation,LDP2_Reference:HSG/152/LDP2/1,Policy:GN 16
Comments:As residents of Bro'r Dderwen we have several concerns about the suitability of the proposed site. ACCESSIBILITY - access through phase 1 and 2 is dangerous and unsuitable for construction traffic and then subsequent 124 extra vehicles, SIZE - there are currently 42 dwellings and 6 vacant plots. The new site will be more houses than that which is not in keeping with the style of estates within the village AMENITIES - there is limited opportunity for employment in the village so will attract commuters increasing safety issues on main road and access in and out of Bro'r Dderwen EROSION OF CULTURE - threat of eroding the welsh language with new residents ECOLOGY AND SUSTAINABILITY - concerns over the sewage system and its effectiveness. Recent overflow into the local brook at Grondre shows there may be further issues as the treatment works are placed under further pressure.Loss of species native to hedgerows and open spaces. - VE IMPACT- quality of life/house prices/vulnerable persons/view

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
representati
on?:

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

Emma Evans

From: No Reply - Pembrokeshire County Council
Sent: 10 December 2024 17:10
To: LDP - For Enquiries
Subject: LDP consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: D Rep



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Name:

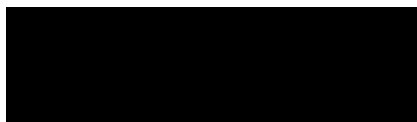
Job Title:

Organisation:

Address:

Telephone
Number:

Main Contact
Email Address:



Date:

10/12/2024

Your name /
organisation:

Residents of Bro'r Dderwen

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

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 I

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

Question

Answer

which language
you would like
to be heard.:

NOTES

This form was created on a computer and is valid without the signature and seal.

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

REDACTED

December 2024

Dear Sir / Madam

Ref HSG/152/LDP2/1

This is a collective letter from residents of Bro'r Dderwen, Clunderwen, raising specific concerns and objections to the inclusion of site 340, South of Bro'r Dderwen, Clunderwen being included on the Local Development Plan (LDP) Deposit 2. In addition to these collective concerns and objections, some specific individual concerns, will be communicated separately by affected residents.

As a group we recognise the pressures on housing capacity within the county and more widely, and the need for Pembrokeshire County Council to assess potential sites as part of a Local Development Plan. However, it is considered that there are some fundamental issues that have not been considered and we strongly make representations that an alternative site should be found.

These concerns and objections have been grouped and summarised below: -

Location of site

The development of housing at Bro'r Dderwen, Clunderwen first commenced in 1999. With plots being released intermittently over a prolonged period by the original site owner, there has been 25 years of development and construction which some residents have experienced. There remain at least 6 plots that have yet to be developed, some of which have yet to be placed on market. This has been extremely frustrating for many residents due to the disruption and movement of heavy vehicles and the dust and dirt this creates. The site was originally given planning permission and approval for a set number of housing, yet the landowner appears to have delayed building works to gain approval to develop a neighbouring field. This site, which currently sits outside the village boundary has previously been rejected for inclusion on the Local Development Plan, and the previous reasons for rejection remain valid. If this site goes ahead for development, residents may be subject to a further 5-10 years of disruption.

Size and scope of proposed activity

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 off 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.

Access to development area and public safety

We understand that access to the proposed site would be through the current development at Bro'r Dderwen. We are already experiencing access issues, due to the lack of sufficient off-road 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 off road parking for one vehicle, which has caused the view to be restricted at this junction on occasions.



Furthermore, as you go 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 a number of near misses at this location. 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.

It does not appear that a Highways assessment has been completed and we would urge a site visit at a time when residents are more likely to be home (evening/weekend).

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 Crossroads to the south of Bro'r Dderwen and incidents of speeding and overtaking within the 20mph zone.

Appropriate service of utilities to proposed site

Reference has been made to an Infrastructure plan, but this is not readily accessible. 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 have also experienced drains being blocked within the estate.

<https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/our-role-in-planning-and-development/phosphorus-limits-on-environmental-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.

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.

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

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/protected-species/bats-and-planning/>

In conclusion, residents have several legitimate concerns and would submit that an alternative site is considered. If the intention is to continue with the proposal, it is requested that a representative meets with residents to address their concerns. We would reserve the right to seek legal representation if matters are not resolved to our satisfaction.

Yours sincerely

Residents of Bro'r Dderwen

REDACTED LIST OF SIGNATORIES