



Neath Port Talbot County Borough Council

Local Development Plan 2011 – 2026

Report of Deposit Representations January 2014



INTRODUCTION

The Neath Port Talbot County Borough Council Deposit Local Development Plan (LDP) was made available for public consultation from 28th August to 15th October 2013.

The Council received a total of **1,343** representations to the Deposit Plan from **802** different respondents. Of these **1,217** were comments of objection and **126** were comments of support.

This **Report of Deposit Representations** has been prepared in accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005¹ and provides details of all comments received in relation to the Deposit Plan.

Responses to the Deposit consultation included a number that related to site allocations shown in the LDP. These ‘Alternative Site’ representations were submitted by individuals or organisations which they consider should either be allocated in the Plan (i.e. a new site), removed from the Plan (i.e. a deleted site) or altered in some way (i.e. an amended site).

Consequently for ease of reference, the report is divided into the following parts:

- **PART 1: Strategy, Policies & Paragraphs** – those representations relating to the Strategy and the wording of the various Policies and Paragraphs contained in the Deposit LDP;
- **PART 2: New Sites** – those representations seeking the allocation of a new site for a particular use or type of development;
- **PART 3: Deleted Sites** – those representations seeking the removal of a site allocated for a particular type of development in the Deposit LDP;
- **PART 4: Amended Sites** – those representations seeking to amend the boundaries of sites allocated for a particular use or type of development in the Deposit LDP; and
- **PART 5: Amended Settlement Limits** – those representations seeking to amend the settlement limits as identified in the Deposit LDP either by including additional land within the settlement limit or conversely, excluding an area of land currently identified within the settlement limit.

Important Note:

In accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005², all the ‘Alternative Sites’ identified in Parts 2, 3, 4 and 5 of this report have been compiled into a separate register³ and the Council is now advertising and carrying out a separate consultation on this register.

This Report is also available to view or download from the Council’s website: www.npt.gov.uk/ldp . If you require this information in larger print or in an alternative format, or if you require more information in regard to any aspect of the preparation of the LDP, please contact the LDP Team either by e-mail: ldp@npt.gov.uk or telephone: [01639] 686821.

¹ Regulation 19 (2) – The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

² Regulations 20 & 21 – The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.

³ Neath Port Talbot County Borough Council: Deposit LDP – Register of Alternative Sites (January 2014).

PART 1: STRATEGY, POLICIES & PARAGRAPHS

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
Dep507	Mrs Nadia Bogdan-Kingman		786384	Support	Neath Port Talbot County Borough Council Deposit Local Development Plan (August 2013)		We agree in principle with the plan and would like it included that the social needs and aspirations of communities and groups within communities would be taken fully into account when planning issues are considered and that the public authority will take the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
Dep572	Mr David Watkins	Natural Resources Wales	786443	Object	Glossary		We would advise that the definition of Infrastructure (Glossary) should include the element of surface water drainage provision.
Dep1268	Mr Phil Holmes	City & County of Swansea	196411	Comment	Neath Port Talbot County Borough Council Deposit Local Development Plan (August 2013)		<p>The allocations and designations in the Deposit LDP which lie on or near to the common County boundaries have been reviewed, and officers will work to ensure that these designations remain consistent across boundaries as work progresses on the Swansea Deposit LDP.</p> <p>This Council recognises and supports the comprehensive consultation and participation that has been undertaken in the preparation of the Plan including the extensive collaborative work between officers of our respective authorities and consider that this work is well reflected in the Deposit documents.</p>
Dep1269	Mr Peter Morris	Powys County Council	196498	Comment	Neath Port Talbot County Borough Council Deposit Local Development Plan (August 2013)		<p>Thank you for consulting Powys County Council on the Deposit LDP. I forwarded the leaflets that were sent to me to Ystradgynlais Library.</p> <p>I summarised the main impacts of the Deposit LDP in an email to Members with wards in the south of Powys in the Ystradgynlais area and asked them to let me have any comments or concerns. I have not received any comments, positive or negative, and therefore I can confirm that Powys County Council has no comments to make on the Deposit LDP. On the basis that I did not receive any comments from members I did not prepare a Committee report for approval.</p>
Dep905	Miss Bethan Jenkins AM		473974	Object	Neath Port Talbot County Borough Council Deposit Local Development Plan (August 2013)		These are comments that I have received from constituents as part of my effort as an Assembly Member for the area to engage with the population regarding the Local Development Plan. It must be noted generally that people feel that their voices are quite often ignored or disregarded in such processes by the Council- that decisions have already been made prior to formal consultation, or that there has not been enough assessments carried out, or evidence based accounts. Therefore I sincerely believe that Neath Port Talbot Council must take this on board for the future. People in this area must feel that they have ownership for changes in their back yard, and fully understand why changes are happening. I sympathise with many of my constituents who are worried about developments on green wedge sites. We have to make sure that there is a balance of development and green spaces so that the history and character of our towns and communities are retained.
Dep526	Mr David Watkins	Natural Resources Wales	786443	Object	Introduction and Background	1	Your Authority will be aware of the Ecosystems approach as advocated by Welsh Government in its Natural Environment Framework "A living Wales". This has been developed as a new approach to managing our environment and natural resources. This was needed because changes in our society are having an impact on our natural resources - our air, water, and landscapes and wildlife. We presume this is reflected within the Plan but cannot find reference to this approach within the deposit Plan text.
Dep522	Mr Richard Davies		785950	Object	Paragraph	1.0.5	<p>The level of communication to the general public has been very poor particularly from the Pre Deposit Consultation stage.</p> <p>The communication effort was:</p> <p>Press release, Leaflet to all homes, Website & letter to previous people involved. Therefore if you were new to the plan & not on the mailing list you were relying on the home leaflet. This gave no details - it just directed you to public buildings or the website in some future weeks time.</p> <p>There is no feedback loop on communication success. The initial consultation report states there were 94 different respondents at</p>

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							<p>this stage. Is this acceptable for a population of approx. 140,000?</p> <p>It is also clear that many of the 94 were from house building companies & organisations.</p> <p>Upon measuring the poor public response, there should have been action within this phase or for the future phases at the very least.</p> <p>There was a very significant change in the house building rate after this consultation. Therefore it was critical this change was communicated well to the general public. This was not done. The same basic items as listed above were used again.</p> <p>I cannot find a figure quoted for the general public response number for the Deposit Participation stage in the autumn of 2012. Please challenge the LDP team to provide this number.</p> <p>Now we are in the Deposit stage, autumn 2013. Again very poor communication. Nearly everyone I ask has little / no knowledge of the plan. Please challenge the LDP team to provide the number of responses from the general public at this stage. Again, no closed loop monitoring has been used to determine that the level & type of communication methods used is good / no good. No roadshows in popular public places, no presentations to communities most affected & no posters in areas of proposed developments. Some of these were used at earlier stages. It is as if the least contact with the public the better.</p> <p>The LDP team has also relied very heavily on the internet. This form is not particularly user friendly for the first uses. I believe this will have had a significant negative effect on achieving responses from the older sections of the community. They have been locked out of the process.</p>
Dep1248	Mr Clive Reed	Swansea Valley Heritage	706760	Object	Paragraph	1.1.11	<p>Thank you for allowing me to respond to the proposed NPTCBC Local Development Plan, which will form the basis for county planning until 2026.</p> <p>My comments all refer to Pontardawe and the surrounding area, particularly to the heritage, environmental and tourism aspects of the LDP, and especially to those sections on Listed Buildings, Canal Network, Historic Environment, and Urban Re-Development. I wish to have amendments made to the relevant parts of the LDP where I consider parts of the Plan require revising.</p> <p>The LDP introduction fails to make a distinction between the development of the historic medieval towns of Neath and Aberafan, and the communities that developed during the Industrial Revolution.</p> <p>Pontardawe is one of the towns that developed in the Swansea Valley during the industrialisation of the valley at the end of the 18th century. The construction of the Swansea Canal 1794-98 allowed for the development of industry along its corridor, and coal mining, tinsplate manufacture, iron making, iron foundries, pottery production, chemical works, brick works and quarrying all added to the commercial mix of the emerging town. Those mix of industries led to the development of Pontardawe and its outlying villages from the 1830's onwards. One could say that the townscape and landscape is typical of Welsh Industrial communities with its rows of regular houses with church, chapel and school intermixed with the commercial developments amid the streets. The earliest recorded domestic dwellings are the small cottages dotted throughout the area with the first row of terraces following them in the 1840's and then by streets from the 1860's onwards. Pontardawe was at the junction of an important road network between Carmarthen and Neath, and Swansea and Brecon. Pontardawe Bridge, which is part of that network, is one of the earliest large masonry single-arch bridges surviving in the area, dating from c1760, built by the famous bridge builder William Edwards. This needs to be recognised in the heritage section.</p> <p>The LDP Introduction and Background fails to recognise the importance of the tinsplate, brick manufacturing, and the potteries industries. The tinsplate industries were of great importance to the employment in the small villages, and to the economic well-being of those areas. There were 26 tinsplate works in the NPTCBC region, with 16 along the Swansea Canal and dependent on it for transport. Far more important than the copper industry in NPTCBC that is mentioned in the Introduction. I wish to see those added to the Introduction.</p>

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							The LDP Plan refers to "Identities" and Pontardawe, in common with other post-industrial towns has lost its identity. At one time, it was known world wide for its steelworks and tinsplate industries, but no longer. Some of the towns in NPTCBC have capitalized on their identity such as Briton Ferry with "Brunel Dock" and the Vale of Neath as "Waterfall Country" (in the LDP Plan). The Swansea Valley Historians are helping to promote Pontardawe with their excellent series of publications on Pontardawe and District that show the industries and communities of the past. Pontardawe needs an identity to give it pride in itself and to promote it outside the area for commercial and tourism exploitation. Identity is important. I hope the new plan will give that to Pontardawe.
Dep714	Mr Mark Harrison	The Coal Authority	787361	Support	Paragraph	1.1.13	The Coal Authority is pleased to note the inclusion of these two paragraphs as part of the context setting for the County Borough, which highlight the importance of mineral resources, in particular coal. This provides a helpful context to plan users to understand that mineral planning is one of the key issues in Neath Port Talbot.
Dep715	Mr Mark Harrison	The Coal Authority	787361	Support	Paragraph	1.1.14	The Coal Authority is pleased to note the inclusion of these two paragraphs as part of the context setting for the County Borough, which highlight the importance of mineral resources, in particular coal. This provides a helpful context to plan users to understand that mineral planning is one of the key issues in Neath Port Talbot.
Dep831	Lindsey Curtis	Sustrans Cymru	787673	Object	The National, Regional and Local Policy Context	1.2	Suggested wording: 'The Active Travel Bill (2013) places a series of duties on local authorities in Wales that will give them legal obligations to plan a network of walking and cycling routes and work to deliver that network, by building new routes and improving existing routes. It also requires Local Authorities to consider the needs of walkers and cyclists when new road schemes are brought forward (be that improvements to current roads or new roads).'
Dep477	Dr Charles Hipkin		785966	Support	Paragraph	1.2.10	Reasons The Active Travel Bill has reached Stage 4 and was agreed by the Assembly on 1st October 2013. The Bill requires local authorities to continuously improve routes and facilities and requires new road schemes to consider walkers and cyclists at design stage. As a forward planning document it is imperative that the LDP acknowledges and embodies the requirements of the Active Travel Bill.
Dep478	Dr Charles Hipkin		785966	Support	Paragraph	1.2.13	Ensuring that environmental protection and enhancement are fully integrated is essential and I welcome the inclusion of this as a key priority. This should be guided and informed through the LBAP and NPT Biodiversity Forum.
Dep527	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	1.2.23	Some of the most important 'distinctive biodiversity' in NPT is contained within the undeveloped coastal region, perhaps the last truly wild area of NPT. It is here that the region has lost most of its unique, natural character in past decades. Any intent to preserve or enhance the distinctive biodiversity of NPT must engage in the full protection of this natural resource.
Dep528	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	1.2.28	Paragraph 1.2.23. South West Wales Regional Waste Plan (RWP) 1st review (2008). We acknowledge that this document represents the latest position in respect of Waste management in South West Wales.
Dep913	Miss Bethan Jenkins AM		473974	Object	Paragraph	1.2.28	Paragraph 1.2.28. Shoreline Management Plan (2010). Shoreline Management Plans form an important part of the Welsh Government (WG) strategy for managing risks due to flooding and coastal erosion. They were prepared by 'Coastal Groups' consisting of local authorities, the former Environment Agency, the former Countryside Council for Wales, and other partners. We recommend that this paragraph is amended accordingly.
							Shoreline Management Plan A constituent has contacted me regarding the Shoreline Management Plan (SMP). How does this relate to the restricted access and inquiries on-going with Morfa Beach?

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Dep1294	Dr Charles Hipkin		785966	Object	Paragraph	1.2.45	<p>The sand dune ecosystem of Baglan Bay represents a designated area of undeveloped coast which should remain free from major development, which is alluded to elsewhere in the document.</p> <p>The development of Baglan Energy Park should include the inclusion of biodiversity corridors (along existing arteries) that will ensure connectivity in the region, particularly with respect to the extraordinary biodiversity of this brownfield site and its connectivity with the Baglan Bay sand dune ecosystem and other areas such as the Lapwing Mitigation Area. This will require a departure from the normal cosmetic dressing of roadways and verges with exotic shrubs and lawns and would be less expensive and easier to maintain than the 'exotic shrub and lawn' approach. This should be informed via the NPT Biodiversity Forum. In addition, it would be of great benefit to allocate at least one compartment on the Baglan Energy Park site as a receptor site or rescue area in mitigation for loss of species and habitat elsewhere.</p> <p>I presume that the use of the term Baglan Bay/Baglan Energy Park is generic and excludes the sand dune ecosystem (which is known as Baglan Bay!). This area of natural undeveloped coast should remain free from major development, which is already stated elsewhere in the document. This should be made clear here.</p>
Dep481	Dr Charles Hipkin		785966	Object	Paragraph	1.2.52	<p>The sand dune ecosystem of Baglan Bay represents a designated area of undeveloped coast which should remain free from major development, which is alluded to elsewhere in the document.</p> <p>The development of Baglan Energy Park should include the inclusion of biodiversity corridors (along existing arteries) that will ensure connectivity in the region, particularly with respect to the extraordinary biodiversity of this brownfield site and its connectivity with the Baglan Bay sand dune ecosystem and other areas such as the Lapwing Mitigation Area. This will require a departure from the normal cosmetic dressing of roadways and verges with exotic shrubs and lawns and would be less expensive and easier to maintain than the 'exotic shrub and lawn' approach. This should be informed via the NPT Biodiversity Forum. In addition, it would be of great benefit to allocate at least one compartment on the Baglan Energy Park site as a receptor site or rescue area in mitigation for loss of species and habitat elsewhere.</p> <p>I presume that the use of the term Baglan Bay/Baglan Energy Park is generic and excludes the sand dune ecosystem (which is known as Baglan Bay!). This area of natural undeveloped coast should remain free from major development, which is already stated elsewhere in the document. This should be made clear here.</p>
Dep1297	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	1.2.58	<p>The LDP Plan introduction has as one of its Aims 1.2.58 “to increase the contribution that the tourism industry makes to the economy”. That Aim can assist in creating an identity for Pontardawe.</p> <p>The area around Pontardawe is rich in heritage, both religious and secular, including heritage chapels such as Gellionen (17th century), Gwrhyd and Baran Chapels (early 19th century), which are important religious heritage places which at one time formed “the three chapels walk”, and Llangiwig Church and St John’s Church Cilybebyll which are of Norman derivation. More can be done to promote these for their heritage and tourism value. Historic buildings and places help promote the locality to the outside world.</p> <p>Secular heritage had a larger influence on the developing townships of the Swansea Valley, and the European Route of Industrial Heritage supported by Herian – (Heritage in Action WAG initiative), recognised that by referring to the sites identified as part of a rich industrial inheritance. The Western Route of the Guide has the “anchor site” the National Waterfront Museum in Swansea supported by “key sites” such as Cefn Coed Colliery Museum and Aberdulais Falls. Other important sites recognised in the Upper Swansea Valley are Ynyscedwyn Ironworks and the Twrch Aqueduct, both on the line of the Swansea Canal. The Twrch Aqueduct is reputedly the first aqueduct in the world to have been constructed using hydraulic mortar. I repeat, in the world... Ynyscedwyn Ironworks is where the famous ironmaster David Thomas (born in Wern Ddu/Alltwen in 1794) devised the method of smelting iron ore with anthracite coal, which became known as the hot-blast method. He was invited to the USA in 1837 to develop the American anthracite iron industry, which grew into the largest iron industry in the world. Please recognise these facts and use them.</p>
Dep1299	Mr Clive	Swansea Valley Heritage	706760	Comment	Paragraph	1.2.58	<p>Introduction and Background has in section 1.2.58 the aim of the Strategy is to increase the contribution that the tourism industry makes to the economy. This can only be achieved by a partnership of local authority, private enterprise and the volunteer sectors</p>

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	Reed						working together to promote the important heritage features and locations of their own areas. Unfortunately in the past, senior councillors in Pontardawe refused to assist what they considered a private company make profits on the back of the Council. It was a major effort for the Swansea Canal Society to make any headway in the restoration of the canal in that political environment. I hope this is not the case with NPTCBC.
Dep530	Mr David Watkins	Natural Resources Wales	786443	Support	Key Issues in Neath Port Talbot	1.3	Paragraph 1.3. Key Issues We welcome the identification of the Key Issues and support those identified as being pivotal for resolution by the developing a robust Plan.
Dep2	MS Penny Robinson		778955	Object	Paragraph	1.3.2	Economic growth in NPT has stagnated (K 3), I agree. I agree the level of market demand is low in the valleys (KI 4). I don't agree we need the level of additional house building this plan suggests because of predicted job growth (KI 5). The two are not compatible statements, and I don't see enough emphasis on where a robust strategy for job creation that would justify the level of housing development. Building additional housing does not necessarily support (KI 8) - Support for open space; (KI 10) - Improving the vitality of towns (KI 17) in particular Loss of Character or (KI 18) erosion of the welsh language. These Key issues are at times conflicting and I don't see enough in this document in how to really address those conflicting demands.
Dep830	Lindsey Curtis	Sustrans Cymru	787673	Object	Paragraph	1.3.2	Suggested wording: KI 16: There is a need for improvements to the transport network to facilitate new development, deliver key regeneration proposals and improve accessibility. Reasons The use of the phrase 'highway network' implies improvements to roads. Travel demands, generated by new developments and regeneration proposals, can be met by a range of modes and routes and should not focus solely on the highway network. Changing the wording to 'transport' places the issue in the context of the Active Travel Bill and the requirements for local authorities to continuously improve walking and cycling routes and for new road schemes to consider walkers and cyclists at design stage. As a forward planning document it is imperative that the LDP acknowledges and embodies the requirements of the Active Travel Bill.
Dep216	Mr G Morgan	Ystalyfera Community Council	196360	Object	The Strategy	2	Ystalyfera Community Council wish to record the fact that there is little affecting the Ystalyfera / Godre'r Graig areas in the Plan. It appears that the Development Plan emphasises that Neath Port Talbot County Borough Council ends at Pontardawe in the Swansea Valley which is exactly the public's perception. It is so disappointing. Much of the aspirations of the Plan will as always never come to fruition.
Dep271	Ms Tracy Nettleton	Brecon Beacons National Park Authority	589595	Support	The Strategy	2	Further to our previous representations on the Preferred Strategy, the NPA is supportive of the Policy and Strategy set out in the Deposit LDP. You will recall that the NPA requested the inclusion of a policy to protect the special qualities of the National Park, in accordance with the Council's duty under S62(2) of the Environment Act (1995). We note that the Council feel that this policy is not required as there is sufficient protection afforded by the detailed policy in the plan. On reflection, and in reading the detail of the Deposit Plan, the NPA is satisfied that the sentiment of the proposed policy has been met.
Dep444	Mr W D Christopher		786029	Object	The Strategy	2	The Plan acknowledges that commuting has become necessary for the working population of the area and that this has led to congestion. At the same time it proposes a housing policy which calls for a moderate growth in the housing stock - the inevitable result of which will be more congestion. Efforts to reduce congestion by means of improved public transport are rarely successful, largely because 'public transport' is privately run and the authority has little effective say in timetables, route etc. At present it seems that First is more concerned about trying to squeeze Select out of business rather than running a decent service of

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							<p>their own and the passengers would certainly not gain if they succeeded in doing so. The congestion problem has not been helped by the poor access to new build sites such as those around Coedffranc Cemetery and the old Stadium in Skewen, and while the new road system at Llandarcy has improved matters somewhat in preparation for the full impact of the Coed Darcy development, it remains to be seen how effective it is.</p> <p>The desire to promote town centre growth is at variance with the Authority's settled aversion to the motor car. It is not public transport that is the answer but better parking (and less zealous traffic wardens!). Ask any shop and cafe owner in the centre of Neath about the impact of the present parking restrictions. This is set to be worsened by the development of the new shopping centre with the loss of the one ground level parking facility within reasonable distance of the centre of town. The (now abandoned?) proposal for cover shopping throughout the town centre seems to have been the best idea put forward for genuine town centre improvement / regeneration that has been suggested in recent times. Multi storey parking is not necessarily the answer because many people feel uncomfortable about using such car parks, particularly in late evenings (e.g. for late night shopping) if, in fact such a car park would be open that late (which would, in itself, be a rarity). Added to this the proposal to develop Milland Road for housing is bound to have an impact. I am not clear about just where this is to take place but any impact on the car park there, though underused, would be a further detrimental step. If it impacts on the industrial sites it would presumably mean the loss of jobs or moving them with the possibility of more commuting. And don't forget the fair! The only thing that ever happens in Neath according to some!</p> <p>There seems to be little point in addressing the issue of the Welsh language or that of windfarms because the final outcome of these decisions is dictated at a higher level.</p> <p>Again, I apologise for not having made your job any easier by not following the set questions, but I really did not feel I could address these issues properly in that way.</p>
Dep1278		Coombe Tennant Estate Co. Ltd.	457946	Support	The Strategy	2	Section 2 - The Strategy is supported. Paragraph 2.5.19 places emphasis on the Coastal Corridor where the greatest concentration of housing and employment are focused. The settlement of Skewen, which is related to the greater Neath urban area, is included within this area.
Dep531	Mr David Watkins	Natural Resources Wales	786443	Object	Vision	2.1	<p>Paragraph 2.1 Vision</p> <p>We are generally supportive of your Vision, which has evolved to reflect the three core pillars of sustainability and their integration (environmental, social and economic), which is supported by a sustainable development strategy with a focus on the regeneration of brownfield sites including areas of land at Coed Darcy; Baglan Bay and the Swansea University campus site.</p> <p>We welcome the objective to support and enhance the natural heritage. Whilst we note the intention to maximise the benefits from natural resources, we consider that the Vision should include an objective to manage natural resources sustainably in the delivery of environmental, social and economic benefits.</p> <p>We therefore recommend that the first sentence of the final paragraph is amended to read: "Benefits from natural resources will be optimised through their sustainable management and the cultural, historic and natural heritage..."</p> <p>Additionally at this stage we wish to highlight that it does not The approach advocated by Welsh Government in its Natural Environment Framework, "A Living Wales", has not been mentioned, least reflected, in either the Deposit Plan or the Sustainability Appraisal.</p> <p>Given that the EU has committed "to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020, and restore them, insofar as feasible while stepping up the EU contribution to averting global biodiversity loss", it is of concern that NPT CBC appears not to have acknowledged the concept of Ecosystem Services, or made a serious attempt to embed the rationale of this within the LDP.</p>
Dep880	Mr	St. Modwen	787655	Support	Vision	2.1	The DLDP states, as part of its vision that, 'key sites at central Port Talbot, Baglan Bay, Coed Darcy and the Swansea University

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	Ben Cook	Developments Ltd					<p><i>Science and Innovation Campus coupled with the area's good and improving transport and communication links will help deliver a competitive, knowledge based economy' . The vision describes how existing assets (such as Baglan Bay) located along the urbanised coastal belt will help to improve the economic and social outlook for the whole area, while improving the general environment. These specific references to key projects are welcome and establish the Plans (and the Council's) clear priorities and the attention that they will be given over the plan period.</i></p> <p>This vision is to be delivered through a number of objectives. These include:</p> <ul style="list-style-type: none"> • Objective 5: which aims to realise the potential for sustainable economic development along the Coastal Corridor, and sees Coed Darcy, Swansea University Science and Innovation Campus, Baglan Bay and Harbourside as anchors for growth. • Objective 11: to promote and protect a diverse portfolio of employment opportunities to meet the needs of residents and businesses and stimulate economic growth. • Objective 12: improve and strengthen the economic base of Neath Port Talbot to increase economic activity, reduce the unemployment rate in line with the Welsh average and negate some of the impacts of a reduced working age population. • Objectives 19 and 20: which aim to ensure that Neath Port Talbot makes an appropriate contribution to energy needs (and especially renewable sources) and deals effectively with waste. <p>These objectives combine to clearly indicate the potential of Baglan Bay and the Council's corporate priority and high level commitment to deliver regeneration there. They reflect a clear understanding that Baglan Bay is a project with regional potential and national profile that will stimulate significant activity and meet the needs of a variety of sectors. SMDL has made a major long term commitment in challenging conditions and the substantial progress that has already been made on the site is a clear signal that comprehensive regeneration will continue across the whole of the plan period.</p> <p>Overall, we support the priority that Baglan Bay is given in the DLDP as it recognises the project's strategic importance and progress on the site to date.</p>
Dep926	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Vision	2.1	<p>The early and specific reference to the potential and significance of Coed Darcy as a key project (or one of the plan's 'anchors') is supported. No amendments to the site or the wording of the plan is sought with respect to the vision and objectives of the Plan.</p> <p>Vision and Objectives</p> <p>As signalled in earlier representations, the significance of Coed Darcy as an urban regeneration initiative of national, sub regional and local importance is difficult to exaggerate. This was recorded in our pre-deposit LDP representations, which suggested that direct reference to the key sites, including Coed Darcy, was needed to reflect the collective priority to be given to these projects. Our view is that, given the scale and impact of the Coed Darcy proposal, it deserved attention in the plans overarching vision (and not just in it's more detailed area based proposals). These comments and recommendations appear to have been accepted by the Council - and it is clear that Coed Darcy is one of the key, named regeneration projects that lie at the heart of the LDP. The adjustment to the wording of the Vision in the DLDP is supported and welcomed.</p> <p>In addition, the objectives that emerge from the vision have been changed to include area based objectives which make direct reference to Coed Darcy and other Coastal Corridor regeneration projects it calls these 'anchors' of the growth which is an accurate and appropriate description. This is also welcome as it is important that early in the document, and as a 'thread' which runs through the plan, the Council's corporate priority and high level commitment to deliver these schemes is made clear. The Council recognises the unique opportunity (and responsibility) the key projects present and their direct reference in the vision and objectives of the LDP gives the vision an important practical and measurable dimension.</p> <p>The Importance and Credentials of Coed Darcy</p> <p>As stated above, the priority given to Coed Darcy in the plan, as an anchor for the strategy for Neath and for a large part of the</p>

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							<p>County Borough, is fully supported.</p> <p>Coed Darcy is, however, a project of regional potential and national profile that will stimulate significant activity and jobs in its preparation, delivery and operation. SMDL has made a major long term commitment in challenging conditions and the substantial progress that has already been made on the site is a clear signal that comprehensive regeneration will continue across the whole of the plan period.</p> <p>In this way and as stated already - Coed Darcy is more than a source of new housing - it is important as a strategic initiative that should be given primary importance (and protection) through the plan's proposals, phasing and delivery. The plan makes important references to Coed Darcy and these are appreciated. However, its provisions for the site need to match SMDL's commitment and most significantly they need to reflect the project's total potential and priority which goes well beyond (just) the provision of new homes. This concern is expanded upon in section 6 of this report.</p> <p>The Plan's statement that Coed Darcy will meet the majority of the Neath spatial area's housing needs and has the potential to provide an increased number of houses is also correct. This approach recognises the substantial progress made with the site already, and makes provision for different economic circumstances which will drive an increase in the number of houses that can be delivered there.</p> <p>For all these reasons, we support the priority that Coed Darcy is given in the DLDP. It recognises the project's strategic importance and the progress on the site to date. Whilst this progress has been substantial, and further development is in the pipeline, the project needs the LDP's complete assistance throughout the plan period. On the face of it, the plan does this - and as this section makes clear, there is much to support in terms of the plans overall aims, objections and priorities. Our concern with the DLDP is that this is then threatened by its development strategy which promotes a level of growth which is both unrealistic and (unintentionally) very harmful.</p>
Dep1246	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	2.1.1	<p>The Deposit Local Plan fails to deliver in many respects as far as the Cwmllynfell Electoral Division (comprising the villages of Cwmllynfell and Rhiwfawr) is concerned. In 2.1.1 it is claimed that the LDP has a vision that "the County Borough's rural areas and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising on existing successes such as the Strategic Tourism Destinations at Margam Park and the Afan Valley" The vision ignores the fact that another Strategic Tourism Destination namely the Brecon Beacons National Park is immediately adjoining Cwmllynfell. The failure to declare a settlement limit for Rhiwfawr would discourage new economic activity through small scale employment or tourism initiatives.</p> <p>The Deposit LDP refers to the Welsh Governments recently published new regeneration framework which has a vision <u>that everybody in Wales should live in well-connected vibrant, viable and sustainable communities with a strong local economy and good quality of life</u>. The Plan fails to support this vision in its treatment of Cwmllynfell and particularly Rhiwfawr despite the aspirations that are portrayed in many of the policies and the statements made in the plan. The County Borough Council is therefore invited to explain its lack of commitment towards Cwmllynfell (mentioned only twice in the deposit LDP- once in the context of cycling and once in the context of the Welsh Language) and Rhiwfawr (Penrhiwfawr mentioned only once in the Settlement Hierarchy). It is obvious that as far as the Cwmllynfell Electoral Division is concerned the policies and statements in the Deposit LDP do not correlate with the Welsh Government's regeneration framework or the vision outlined in paragraph 2.1.1 of the plan. The following claim made by Councillor Anthony Taylor in his foreword also seems a hollow promise as far as Cwmllynfell and Rhiwfawr are concerned: "The LDP sets out the Councils planning policy for the next 15 years and has been designed to make sure that the development of our County Borough over that period <u>genuinely makes Neath Port Talbot a better place as well as complying with national and regional policy guidance</u>". The plan has also failed to recognise that the greatest proportion of the inhabitants of Cwmllynfell and Rhiwfawr are Welsh speaking and as such development should be encouraged according to the County Borough Councils Welsh Language Supplementary Planning Guidance.</p>
Dep889	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Objectives	2.2	<p>The DLDP states, as part of its vision that, 'key sites at central Port Talbot, Baglan Bay, Coed Darcy and the Swansea University Science and Innovation Campus coupled with the area's good and improving transport and communication links will help deliver a competitive, knowledge based economy'. The vision describes how existing assets (such as Baglan Bay) located along the</p>

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							<p>urbanised coastal belt will help to improve the economic and social outlook for the whole area, while improving the general environment. These specific references to key projects are welcome and establish the Plans (and the Council's) clear priorities and the attention that they will be given over the plan period.</p> <p>This vision is to be delivered through a number of objectives. These include:</p> <ul style="list-style-type: none"> Objective 5: which aims to realise the potential for sustainable economic development along the Coastal Corridor, and sees Coed Darcy, Swansea University Science and Innovation Campus, Baglan Bay and Harbourside as anchors for growth. Objective 11: to promote and protect a diverse portfolio of employment opportunities to meet the needs of residents and businesses and stimulate economic growth. Objective 12: improve and strengthen the economic base of Neath Port Talbot to increase economic activity, reduce the unemployment rate in line with the Welsh average and negate some of the impacts of a reduced working age population. Objectives 19 and 20: which aim to ensure that Neath Port Talbot makes an appropriate contribution to energy needs (and especially renewable sources) and deals effectively with waste. <p>These objectives combine to clearly indicate the potential of Baglan Bay and the Council's corporate priority and high level commitment to deliver regeneration there. They reflect a clear understanding that Baglan Bay is a project with regional potential and national profile that will stimulate significant activity and meet the needs of a variety of sectors. SMDL has made a major long term commitment in challenging conditions and the substantial progress that has already been made on the site is a clear signal that comprehensive regeneration will continue across the whole of the plan period.</p> <p>Overall, we support the priority that Baglan Bay is given in the DLDP as it recognises the project's strategic importance and progress on the site to date.</p>
Dep928	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Objectives	2.2	<p>The early and specific reference to the potential and significance of Coed Darcy as a key project (or one of the plan's 'anchors') is supported. No amendments to the site or the wording of the plan is sought with respect to the vision and objectives of the Plan.</p> <p>Vision and Objectives</p> <p>As signalled in earlier representations, the significance of Coed Darcy as an urban regeneration initiative of national, sub regional and local importance is difficult to exaggerate. This was recorded in our pre-deposit LDP representations, which suggested that direct reference to the key sites, including Coed Darcy, was needed to reflect the collective priority to be given to these projects. Our view is that, given the scale and impact of the Coed Darcy proposal, it deserved attention in the plans overarching vision (and not just in its more detailed area based proposals). These comments and recommendations appear to have been accepted by the Council - and it is clear that Coed Darcy is one of the key, named regeneration projects that lie at the heart of the LDP. The adjustment to the wording of the Vision in the DLDP is supported and welcomed.</p> <p>In addition, the objectives that emerge from the vision have been changed to include area based objectives which make direct reference to Coed Darcy and other Coastal Corridor regeneration projects it calls these 'anchors' of the growth which is an accurate and appropriate description. This is also welcome as it is important that early in the document, and as a 'thread' which runs through the plan, the Council's corporate priority and high level commitment to deliver these schemes is made clear. The Council recognises the unique opportunity (and responsibility) the key projects present and their direct reference in the vision and objectives of the LDP gives the vision an important practical and measurable dimension.</p> <p>The Importance and Credentials of Coed Darcy</p> <p>As stated above, the priority given to Coed Darcy in the plan, as an anchor for the strategy for Neath and for a large part of the County Borough, is fully supported.</p> <p>Coed Darcy is, however, a project of regional potential and national profile that will stimulate significant activity and jobs in its</p>

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							<p>preparation, delivery and operation. SMDL has made a major long term commitment in challenging conditions and the substantial progress that has already been made on the site is a clear signal that comprehensive regeneration will continue across the whole of the plan period.</p> <p>In this way and as stated already - Coed Darcy is more than a source of new housing - it is important as a strategic initiative that should be given primary importance (and protection) through the plan's proposals, phasing and delivery. The plan makes important references to Coed Darcy and these are appreciated. However, its provisions for the site need to match SMDL's commitment and most significantly they need to reflect the project's total potential and priority which goes well beyond (just) the provision of new homes. This concern is expanded upon in section 6 of this report.</p> <p>The Plan's statement that Coed Darcy will meet the majority of the Neath spatial area's housing needs and has the potential to provide an increased number of houses is also correct. This approach recognises the substantial progress made with the site already, and makes provision for different economic circumstances which will drive an increase in the number of houses that can be delivered there.</p> <p>For all these reasons, we support the priority that Coed Darcy is given in the DLDP. It recognises the project's strategic importance and the progress on the site to date. Whilst this progress has been substantial, and further development is in the pipeline, the project needs the LDP's complete assistance throughout the plan period. On the face of it, the plan does this - and as this section makes clear, there is much to support in terms of the plans overall aims, objections and priorities. Our concern with the DLDP is that this is then threatened by its development strategy which promotes a level of growth which is both unrealistic and (unintentionally) very harmful.</p>
Dep375	Mr Graham Thomas		325888	Object	Paragraph	2.2.2	<p>(Objective 3) With respect to the Strategy of the LDP; Communities & large Settlements have received the maximum considerations, with NO consideration for any Individual in their participation from the Candidate Stage in proposing Individual parcels of land and more importantly in identifying the Individual Strategy in putting their land use forward for potential future development in terms of ECO Friendly Housing & Carbon Emission Control.</p> <p>(Objective 17) I do not believe that the LDP has made any considerations again for Individual participation in promoting the Efficient Use Of Land especially when certain areas of land have not been utilised for any purpose over countless years.</p>
Dep483	Dr Charles Hipkin		785966	Object	Paragraph	2.2.2	Note that that OB15 is to ' <i>Conserve NPT's important landscapes, undeveloped coast etc</i> '. Undeveloped coast as used here includes Baglan Bay coastal sand dune system. The use of the term Baglan Bay elsewhere, in terms of major development areas, is confusing.
Dep545	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	<p>Objective OB 5 Economic Opportunities</p> <p>We welcome the objectives to deliver sustainable economic development. We consider that integral to this is the protection of the environmental interests (including the ecosystem services they provide) found within and in close proximity to the identified areas.</p>
Dep546	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	<p>Objective OB 6 Revive Valleys</p> <p>We welcome the objectives to deliver sustainable economic development. We consider that integral to this is the protection of the environmental interests (including the ecosystem services they provide) found within and in close proximity to the identified areas.</p>
Dep547	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	<p>Objective OB 7 Mix of Dwellings</p> <p>We support the above objective.</p>
Dep548	Mr	Natural Resources	786443	Support	Paragraph	2.2.2	Objective OB 8 Affordable Housing

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	David Watkins	Wales					We support the above objectives.
Dep549	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 9 Gypsies We support the above objective.
Dep550	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 10 Open Space We support the above objective.
Dep551	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 11 Diverse Employment Land We support the above objective.
Dep552	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 12 Strengthen Economic Base We support the above objective.
Dep553	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 13 Retail Hierarchy We support the above objective.
Dep554	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 14 Tourism We support the above objective.
Dep555	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 15 Conserve We support the principles of the objective to conserve the county's landscape, geodiversity sites, wildlife and habitats but consider it needs to acknowledge the current planning policy framework with particular reference to enhancing these interests within the local ecosystems. We will expect the Plan policies to clarify what is understood as 'important' wildlife and habitats.
Dep556	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.2.2	Objective OB 16 Air Issues We support the objective but would recommend the deletion of the word "minimise". The aim must be that there should be no adverse impacts.
Dep534	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 1 Climate Change We support the above objective.
Dep536	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.2.2	Objective OB 2 Poor Health This objective begs the question: " How do you reduce peoples exposure to the determinants of poor health"? We support the principle and sentiments of this part of the objective but question the practicalities involved in achieving this objective.
Dep542	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.2.2	Objective OB 3 Sustainable Communities We support the objective but would recommend that the deletion of the word "confident" and insertion of "robust" - it gives a stronger feel which people can identify with.
Dep543	Mr	Natural Resources	786443	Support	Paragraph	2.2.2	Objective OB 4 Leisure Accessibility

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	David Watkins	Wales					We support this objective.
Dep558	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.2.2	Objective OB 17 Efficient Land Use We recommend that this objective be amended to read; "Promote the efficient use of land and water and safeguard the quality and quantity of environmental assets".
Dep559	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 18 Mineral Resources We support the above objective.
Dep560	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 19 Energy Needs We support the above objective.
Dep561	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 20 Waste We support the above objective.
Dep562	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 21 Active Travel We support the above objective.
Dep563	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 22 Traffic Growth We support the above objective.
Dep564	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 23 Protect and Enhance We support the above objective.
Dep565	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 24 Main Arterial Gateways We support the above objective.
Dep566	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.2.2	Objective OB 25 Welsh Language We support the above objective.
Dep538	Mr H G Rees		785388	Object	Paragraph	2.2.2	<p>Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p> <p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes.</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p>

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							<p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play in the regeneration of the Upper Neath Valley and beyond.</p> <p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p> <p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the whole site.</p> <p>Comment</p> <p>It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan – having said which these comments use Rheola as an example that may not be repeated elsewhere.</p>

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							<p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in the Western Valleys Strategy initiate recognised this and it is argued that OB6 should make explicit reference to Rheola.</p> <p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to ‘drag’ economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion</p> <p>Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to</p>

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							recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.
Dep405	Mr Sam Hawking		785482	Object	Paragraph	2.2.2	OB7: Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population. [KI 5, KI 6 and KI 7] : this fails to discuss the needs of existing borderline communities. We suggest that either a separate policy is inserted, or that the relevant clauses are adapted to identify the proactive necessity of bolstering such communities, although we prefer the latter.
Dep406	Mr Sam Hawking		785482	Object	Paragraph	2.2.2	OB 11: To promote and protect a diverse portfolio of employment land and employment opportunities to meet the needs of residents and businesses and stimulate economic growth. [KI 3, KI 4 and KI 9] : the existing businesses in such marginal settlements require an adequate and diverse portfolio of housing (local people!) to make them viable.
Dep809	Mr Richard Buckland	Infinis	786727	Support	Paragraph	2.2.2	The following Plan objective is supported as being consistent with and reflective of national planning guidance. Objective 1 - Minimise the causes and consequences of climate change through reduced greenhouse gas emissions and adapt to climate change through consideration of its effects in the design and location of new development.
Dep716	Mr Mark Harrison	The Coal Authority	787361	Support	Paragraph	2.2.2	The Coal Authority fully supports the inclusion of Objective OB18; which sets out the Council's commitment to safeguarding mineral resources and making a proportionate contribution to the mineral and energy needs of Wales. Given the presence of significant coal resources within the County Borough, The Coal Authority considers it important that such objectives are included in the LDP.
Dep717	Mr Mark Harrison	The Coal Authority	787361	Support	Paragraph	2.2.2	The Coal Authority fully supports the inclusion of Objective OB19; which sets out the Council's commitment to safeguarding mineral resources and making a proportionate contribution to the mineral and energy needs of Wales. Given the presence of significant coal resources within the County Borough, The Coal Authority considers it important that such objectives are included in the LDP.
Dep1247	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	2.2.2	The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact: "OB 7: Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population".
Dep1249	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	2.2.2	The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact: "OB 8: Provide additional affordable housing units <u>throughout the County Borough</u> and ensure new housing developments make a fair and justified contribution towards the provision of affordable housing".
Dep936		Oak Regeneration Incorporated	589629	Object	Paragraph	2.2.2	As the plan does not respond to key issues referred to under 'KI 14: There are significant areas of brownfield (previously developed) land requiring remediation and regeneration' and therefore fails to satisfy the above coherence and effectiveness tests, the following change to the plan (highlighted in bold) is proposed: Area Based Objectives OB 5 Realise the diverse potential and opportunities available for sustainable economic development along the Coastal Corridor to foster economic growth, with Coed Darcy, Swansea University Science and Innovation Campus, Baglan Bay, and Harbourside being the anchors for growth. [KI 3] This does not discount the need to bring forward strategic mixed use sites where their development secures the long term restoration of lands adversely affected by previous coal workings and in need of regeneration. This is particularly relevant at Margam Surface Mine, the restoration of which is of considerable importance to surrounding local communities and therefore of strategic importance to the local council.

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Dep854	Mr Huw Thomas		782389	Object	Paragraph	2.2.2	OB6 - add reference to housing as a means to reinvigorate.
Dep1279		Coombe Tennant Estate Co. Ltd.	457946	Support	Paragraph	2.2.2	Area Based Objective OB7 is supported (i.e. 'Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population).'
Dep275	Mr David Llewellyn	Bridgend County Borough Council	199968	Object	Development Strategy	2.3	Development Strategy Bridgend County Borough Council (BCBC) is supportive of the LDP Development Strategy which seeks to focus growth along the Coastal Corridor whilst reinvigorating the Valley communities. In this context, the role of the settlements in the Upper Llynfi Valley in Bridgend County Borough, particularly Maesteg, could be recognised in the Plan. This area is designated as a Strategic Regeneration Growth Area (SRGA) in the adopted Bridgend LDP, and could therefore play a role in the reinvigoration the Upper Afan Valley, acting in its capacity as a 'hub' settlement as identified in the Wales Spatial Plan, with the benefits of its growth having positive effect on settlements within Neath Port Talbot, particularly as the Bridgend LDP identifies the A4603 to Croeserw as part of its strategic road network.
Dep223	Mr Paul Bulmer		345444	Support	Development Strategy	2.3	The general proposed strategy does look to be good and well thought through.
Dep445	Mrs Deborah Phillips	Pontardawe Town Council	196356	Object	Development Strategy	2.3	The Town Council was uncomfortable with the different strategies to be employed between the Valleys and the Coastal Corridor as, the Coastal Corridor only, would be favoured with inward investment and employment opportunities from larger companies. There were little firm proposals to revitalise the economy in the valley areas and a complete lack of a transport plan to provide valley residents with access to employment in the Coastal Corridor.
Dep798	Ms Jean White		336225	Object	Development Strategy	2.3	My main concern is about the parts of the Plan related to the Valley areas, in particular the Afan Valley. The aspirations for regeneration, for preventing the loss of services and for providing equality of access and opportunities, especially to children, are laudable, but I fail to see any explanation or evidence of their being carried out, bearing in mind that we are 2 years into the LDP timescale(2011). Dereliction has increased and despite Cymmer being thought of as a hub, the facilities here have declined. We now have no post office, bank, petrol station, church (this has been redeveloped as a private house), or community centre/council office. These buildings, apart from the private investment in the church, remain empty and deteriorating as is Hebron Chapel and the former Workmen's Hall. Currently Cymmer Library is under threat of closure which completely negates the hopes of the LDP by the very Local Authority which is leading it.
Dep1073	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	Development Strategy	2.3	The enclosed report, 'Neath Port Talbot Local Development Plan, Representations: Coed Darcy, October 2013) provides detailed comments on the proposed growth strategy (see section 4). Whilst the spatial strategy is broadly supported, there are very serious concerns about the proposed level of housing growth and the consequences that it will have. Section 4 of the enclosed report explains the concerns with: a) The Council's rationale for deviating from the 2008-based projections and the change in level of growth since that proposed in the Pre-Deposit LDP Proposals; b) The use of the employment-led strategy, as proposed and justified by PBA; and c) The potential implications of the 2011-based projections on the proposed level of growth.

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							<p>The implications of the growth level are reflected in our comments on the LDP's housing requirements (and relate specifically to Policies SP7 and H1).</p> <p>We have reviewed the Peter Brett Associates (PBA) study (which was not available when the LDP Deposit Plan Proposals Report was consulted on) and the updated Population and Housing Topic Paper (August 2013). Together, these documents describe the plans revised development strategy and this section summarises the fundamental concerns we have them (and principally with the level of growth they propose).</p> <p>Spatial Strategy</p> <p>As outlined in our representations on the Pre-deposit Proposals, a spatial strategy that would continue the UDP Strategy is our favoured option as it would direct development to key urban regeneration sites and to areas which are already home to a high proportion of the population. In principle and notwithstanding the growth level that come with it, the proposed preferred spatial strategy can be broadly supported. The direct and firm references to Coed Darcy as providing an 'anchor' for proposed growth are particularly welcome.</p> <p>The basic logic behind this spatial strategy is also supported as it will continue to follow and shape market forces which focus housing, employment and commercial development along the M4 corridor. This 'Coastal Corridor' strategy area contains the main centres of population, infrastructure and facilities, and benefits from easy access to the M4. These factors make the area more attractive in terms of investment for business, commercial and residential development. In this context, the DLDP's preferred Spatial Strategy is considered robust, appropriate and ambitious.</p> <p>Level of Growth</p> <p>Whilst the spatial strategy is supported, we have a number of serious concerns about the level of growth and number of dwellings proposed in the DLP. These are explained below and follow a number of key connected issues:</p> <p>a) The Council's rationale for deviating from the 2008-based projections and the change in level of growth since that proposed in the Pre-deposit LDP Proposals; b) The use of the employment-led strategy, as proposed and justified by PBA; and c) The potential implications of the 2011-based projections on the proposed level of growth.</p> <p><i>The need for deviation from the 2008-based WG Projections</i></p> <p>It is very clear that the driver for the very high level of growth proposed as the 2008 based Household Projections and the WG's request that they should be followed. Most significantly, WG made a number of comments on the much more sensible proposed level of growth in the Pre-Deposit Proposals (in 2011), claiming that the 'moderate' proposed level of growth was unacceptable. The WG indicated that this was a 'massive decrease' from the 2008-based population projections (which suggests that 10,569 new units would be required between 2011-2026, or 705 units per annum). The Council had, in the Pre-Deposit Proposals, referred to past build rates as the reason for this deviation from these WG projections, which were defined in the Pre-Deposit Proposals as 'very high growth' and a clearly unrealistic option.</p> <p>Notwithstanding this, the WG, in its comments on the Pre-deposit Proposals asked the Council to better explain its position. The WG's request relies on PPW which advises that household projections should form the starting point for assessing housing requirements and requires LPA's to consider the appropriateness of the projections for their area, based upon all sources of local evidence. PPW recognises that there is scope for deviation from the WG projections, providing they are fully justified in terms of the issues listed in paragraph 9.2.1 of PPW - which include the WG's latest household projections, local housing needs and strategies and social considerations.</p> <p>In our view, the reason for the deviation was clear. It is explained in the 2011 Pre-Deposit Proposals report where it is stated that the high growth option, in accordance with the WG 2008 projections, would require a rate of house building significantly higher</p>

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							<p>than has been achieved in the past. The Council was correct in its observation that such a high level of growth would be 'unrealistic and undeliverable'. The Council was also correct that this option should be discounted on the basis that development of this scale could result in an unsustainable pattern of development.</p> <p>There was therefore a significant difference between the WG's and Council's preferred level of growth - and the Council was clearly under pressure to raise growth levels to match WG household projections.</p> <p>The Council could have responded by agreeing that the WG projections and forecasting provide the 'starting point' for assessing housing projections. In some areas, the level of growth proposed does align closely with WG household projections and can and should be delivered. However, it could also then have said that this does not mean that they are fixed and 'hard and fast' indications of the level of growth for the authority they refer to. As identified in PPW, there are a number of other factors that must be taken into account. The strategy should be appropriate to, and accord with local objectives, characteristics, needs, demands and realities - in this case, in Neath Port Talbot. Moreover, in this instance, the 2008-based figures were so high for Neath Port Talbot that they were obviously flawed and wrong - a fact clearly proven by the more recent and census based 2011 projections.</p> <p>Rather than make this case, the Council commissioned PBA to re-consider the proposed level of growth based on the Swansea Bay region's economic growth potential. It is clear, from the language used in the topic paper, that this exercise and change in approach was led by the WG comments and the intent to 'conform' with the WG's view that the 2008-based projections were used as the starting point for the consideration of housing requirements. There are a number of references in the topic paper to this need for conformity with WG projections, which is established in paragraph 9.2.2 of PPW.</p> <p><i>Concerns with the employment-led strategy</i></p> <p>The Council employment-led strategy continues to propose a level of growth that deviates from the 2008-based projections. As set out below however, there are significant concerns with the employment-led approach that would suggest that the proposed level of growth the DLDP is still too high.</p> <p>This is a shame because the report's starting points are clearly relevant: additional housing is needed to attract people to move to the area to access jobs, education and attractive housing and to retain people who are already present. Additional housing is also needed to enable households to down-size or access accommodation better suited to their needs. The need to align employment growth (and the amount of employment land to be allocated) and population growth (and the amount to housing land to be allocated) can be appropriate too. Aspirations for economic growth are supported as well - but at the right level that is realistic and does not risk the damaging and unforeseen consequences.</p> <p>Here though these points do not trigger the need to depart from a 'traditional' approach to identifying the needed for housing which should rely on natural change, migration and household formation. This is because of the amount of uncertainty and number of assumptions made on the level of economic growth needed continue to make PBA conclusions an unreliable and inappropriate base for housing strategy.</p> <p>There are a number of reasons for that. On one level, PBA recognises in its report that there is likely to be limited public (and private funding) for development, (and as a result, PBA concludes that the Council should identify clear priorities, favouring the strategic allocation of sites requiring the least intervention) .</p> <p>The PBA report relies on EE base employment forecasts, which are adjusted to consider the impact of higher growth. The economic-led scenarios also make the following assumptions:</p> <ul style="list-style-type: none"> • Unemployment rates will fall to the Welsh average of 6.5% for the period 2004-2011; • Economic activity rates will increase to the Welsh long term average of 73% over 2004-2011, which will require targeted interventions to support residents into work; • Intervention should be focussed on providing for a range of business unit sizes through creating a premises 'ladder'

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							<p>within future strategically allocated site;</p> <ul style="list-style-type: none"> • Sufficient European Structural Funds will be available to unlock economic growth - to support the proposed level of growth. At the moment, the amount of Structural Funds committed to the County and the projects it should prioritise and support is unknown; • As NPT is not an identified economic hub, the role of partnership working with Swansea and other neighbouring authorities, takes increased importance - especially since NPT currently has viewed jobs and a relatively low self-containment rate; • The PBA report notes that past legacies have left a relatively poor skilled workforce, especially for the more modern growth sectors which are likely to emerge in the County, and therefore the employment-led growth strategy relies on significant institutional training for employment requiring a different skill-set (i.e. the knowledge based economy); and • PBA recognise that forecasts can fail to pick up on significant local demand factors relating to specific sector investments, which need to be checked. PBA highlight the miss-alignment in the EE employment forecasts with what is happening at the local level, in relation to Tata (see below). <p>PBA also highlight the lack of consistency between the EE forecasts. The EE forecasts show a substantial drop in the 'metal products' and 'specialised construction activities' sectors. However, Tata Steel, one of the County's largest investors and employers, and considered within the 'metal product' sector, are said by PBA to be increasing its investment and so it is not expected to top macro trends forecasted to apply in this sector. In addition, the 72% drop in 'specialised construction activities' is not discounted because investment in infrastructure such as the PDR and regeneration of Port Talbot is assumed to continue across the plan period.</p> <p>These are important assumptions and need to be tested. As a benchmark of the EE forecasting used, we have considered the Oxford Economics (OE) data for employment growth in NPT. Whilst the divisions in sectors do not match, OE indicates much lower forecasts for total employment. Between 2010 and 2025, OE forecasts indicate that the number of people employed in manufacturing is to decline by 0.8% and the number of people employed in construction is to decline by 0.6%. These compare with much higher rates applied by PBA.</p> <p>As stated above, unless the DLDP approach is changed, getting these forecasts right is critical as the employment-led strategy relies on significant growth in the amount of employment to justify new housing. However, we consider that this cannot be done as the economy remains in one of its most unpredictable states in living memory. As an example, various sources suggest that the tough economic climate in Europe has resulted in a decline in steel demand by about a third since the start of the financial crisis. Tata has reported that these tough conditions are likely to persist in the 'near to medium' term. This resulted in almost 600 jobs being cut in South Wales in November 2012. We take no delight in these figures - they simply underline the difficulty in making reliable predictions of economic conditions especially if they are based on substantial levels of growth.</p> <p><i>Implications of 2011 based projections</i></p> <p>The solution to this problem is relatively straight forward, and comes from the Population and Housing Topic Paper which refers to the release of the 2011 Census populations. Although these will not be released until the end of 2013, the Council describes these as more contemporary and highlight current growth requirements much more effectively. As a result and even if the 2011 household projections are the latest available as these comments (and the DLDP) were written, there is much we can learn from the population projections in the meantime. These lessons are obvious and the topic paper identifies the known, early implications of the 2011 Census data.</p> <p>At a basic level, the 2011-based projections show that population growth will be 'much lower' (topic paper, para 4.2.6) than the 2008-based projections. The 2011-based population projections predict that the percentage change in total population in the County Borough between 2011 and 2033 has fallen from an 8% increase of 11,700 additional people using the 2008-based projections to a 5% increase of 2,500 additional people using the 2011-based projections. Within the plan period (up to 2026), the 2011-based projections suggest that the population will increase to 142,700. This compares to 148,038 as projected in the 2008-based figures. The 2011-based population projections therefore suggest that the County Borough will grow by 5,338 less people than anticipated in the 2008-based figures. The projections also indicate a declining population from 2028.</p>

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							<p>The topic paper (para 4.1.52) is clear on the contrasts between the 2008 and 2011 based projections. It attributes these to the lower migration assumptions used which are considered to be more realistic with current trends due to the state of the economy and a greater number of deaths over births, which is common in an aging population. The Council, in the topic paper, recognises that the 2008-based in migration figure of 500 people per year is due to a high level of migration between 2002 and 2006 and therefore the 2011 projections, which use a different period, are more realistic. The 2011-based projections suggest that migration will increase population by 190 each year .</p> <p>Although the Council appears to accept this level of migration, the level of growth is based on a significantly higher net migration that relies on a number of assumptions. It is noted that the 2008-based migration projection does reflect the poor economic climate and there may be some flexibility to support a higher projection to allow for ambition and an improvement to the economy. However, the Council's contention that net migration will be around 439 people is unsound and evidence based is clearly flawed. The Council's approach and reasoning for this high level of growth proposed in the DLDP is clearly driven by net migration - which in turn, supports the ambitious economic-led projections.</p> <p>The Council assumes that, over and above the projected / forecasted migration (2011 figures) of 190 people, an additional 249 people (net) a year will reside in the Authority as a result of an assumed (strong) economic recovery, enlarged EU and the increase internal migrants moving to the Authority for affordable housing.</p> <p>Migration is a complex aspect of population components of change and is noted to be subject to a variety of political, economic and social influences. In some cases, economic interventions will have a positive impact on population growth - however, such interventions will be of a varying degree of success, depending on how effective economic incentives to increase job generation (and therefore population) are, and how well politically-backed or publicly funded they are.</p> <p>We agree that the LDP should plan for improvement to the economy - St. Modwen's projects will help to drive that growth. Our fundamental concern relates to the level of economic growth and intervention relied upon to achieve a net migration assumption of 439 people. As stated above, the topic paper, and PBA's report, makes strong assumptions about the an improved local economy, an enlarged EU and more internal migrants moving to the County Borough - without any robust evidence to support these assumptions. As a result, the level of growth proposed has an extremely fragile base.</p> <p>Summary</p> <p>Whilst its spatial strategy is good, the level of growth is fundamentally wrong. This is caused by the science behind the level of growth which is unsound, no matter how laudable the Council's basic objectives are or the criticisms it is responding to. There is also no check on that science - it clearly proposes a rate of activity and development that will not be delivered no matter how hard everyone tries.</p> <p>Nor is there any real analysis of the implications. These are clear from an assessment of the number of the DLDP and its new allocations (and their location) which are considered in the following dwelling proposed section.</p> <p>Conclusion</p> <p>The proposed level of growth should be reduced. The new rate can either reflect a realistic delivery rate or the 2011-based figures. There should be scope for flexibility and ambition in the growth level, which plans for some improvement to the economy, however this needs to be carefully tempered against the clear risks that over-allocation of land present. The 2011-based population projections indicate that population growth within the plan period will be much lower (5,338 less people) than anticipated in the 2008-based projections. Crudely, assuming a household size of 2.3 persons, this equates to 2,320 less dwellings being required during the plan period (than are currently proposed). This level of growth is more sensible, realistic and sustainable whole.</p>
Dep1250	Mr	Cwmllynfell	196349	Object	Paragraph	2.3.2	The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and

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	P Lloyd-Jones	Community Council					particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact: 2.3.2 - Development Strategy "The LDP uses this strategy to provide a land use structure which focuses on providing sustainable, prosperous communities".
Dep1251	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	2.3.6	The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact: 2.3.6 "... All communities within Neath Port Talbot can help to achieve the aims of the Plan and therefore the strategy recognises all communities and their function within the County Borough".
Dep640	Mr V Price		196316	Object	Paragraph	2.3.11	The division of the County Borough into two strategy areas seems to serve little purpose. Furthermore, the coastal corridor and the valleys have been delineated on the basis of eight spatial areas, creating a tangible line between the two areas (i.e. the coastal corridor and the valleys). In reality, if there is a need to divide the county borough, the boundary between the two should be 'fuzzy', insofar as there are parts of the county borough that share characteristics of both the valleys and the coastal corridor, such as Bryn. We suggest amending paragraph 2.3.12 so that the fourth bullet point says:- "- providing a more flexible to development within the valleys communities and the rural/semi-rural hinterland to Neath and Port Talbot."
Dep567	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.3.11	The Development Strategy appears focused upon the coastal corridor and valley areas. This is a positive approach and appears to reflect the physical and social diversification of the Borough.
Dep912	Miss Bethan Jenkins AM		473974	Object	Paragraph	2.3.11	Swansea Valley general comments I have received many comments from constituents who believe that the valleys areas of Neath Port Talbot are being completely ignored by the LDP process, and the lack of development is leaving such areas behind. They are worried that people will not be able to stay in such areas due to the lack of jobs and weak public transport links, and therefore wish to see the LDP amended to reflect the need for more economic investment in the area.
Dep916	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Paragraph	2.3.11	The plan's provisions for Baglan Bay are found in two main sections. The first is the Development Strategy which comprises both the targeted growth level and a spatial strategy. It is a fundamental element of the LDP Strategy and aims to 'facilitate growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities'. The second section contains more detailed policies which refer to Baglan Bay or cover the uses and activities that the area is expected to accommodate. Development Strategy The plans spatial strategy fits well with the Wales Spatial Plan (WSP). Baglan Bay lies within the Swansea Bay Waterfront and Western Valleys area and the vision for this area aims to create a city region with 'a modern, competitive, knowledge-based economy designed to deliver a high quality of life, a sustainable environment, a vibrant waterfront and excellent national and international connections'. The successful regeneration of Baglan Bay will make an important contribution to this strategy. The LDP's Development Strategy should also focus on issues that are specific to Neath Port Talbot. This requires the plan to

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							<p>respond to the characteristics and potential of the area, including the availability of previously developed land and existing infrastructure, the challenges the area faces and the actions and interventions that can deliver meaningful change</p> <p>The level of growth is based on an economic-led strategy which is aspirational in its approach and aims to maximise job growth within the local economy. This requires a shift from the traditional, declining sectors of mining and manufacturing to higher knowledge based sectors. As a headline this is the correct approach, even if the scale of the growth proposed or anticipated is questionable. [SMDL has raised a number of concerns with this growth scenario with respect to the number of new households proposed. These considerations are addressed separately in representations relating to housing strategy and Coed Darcy].</p> <p>Baglan Bay's contribution to the plan's strategy is summarised in Paragraph 2.4.13 of the DLDP. This commentary follows the submissions SMDL has made to the LPA during earlier stages of the LDP preparation and recognises that Baglan Bay can make a quantitative and qualitative contribution to the areas stock of land for a variety of uses. Some of these can be measured whilst others can be targeted (and not restricted). A large part of the site has attracted interest from the energy sector and we also know - because of its excellent location, significant size and industrial legacy - that it could accommodate civic uses including waste treatment and recycling as well. The site will also attract other uses sectors and flexibility is required to ensure that this can be done over the plan period the potential new employment to be generated. These points are explored in more detail in section 4 of this report.</p> <p>Paragraph 2.4.13 makes it clear that the plan's strategy recognises Baglan Bay's unique characteristics.</p>
Dep568	Mr David Watkins	Natural Resources Wales	786443	Support	Growth Strategy	2.4	<p>Paragraph 2.4 Growth Strategy</p> <p>The growth strategy is an economic led philosophy for the development of the Neath Port Talbot County Borough. You state that allied to this principle is the protection of the environment and health of the local population. We support these sentiments and consider the Strategy statement sound.</p>
Dep734	Mr Phil Holmes	City & County of Swansea	196411	Support	Growth Strategy	2.4	<p>The strategic / spatial approaches set out in the Neath Port Talbot Deposit Plan are generally supported. The Plan's economic-led strategy based upon the evidence base of the Peter Brett Economic Assessment and Employment Land Provision Study and ORS' Local Housing Market Assessment jointly commissioned between our authorities is acknowledged. The statement at para 2.4.1 that the level of growth complements the approach taken in the Swansea Preferred Strategy is therefore both welcome and reassuring.</p>
Dep724	Mr Mark Newey	Welsh Government	211935	Object	Growth Strategy	2.4	<p>Economic methodology</p> <p>The authority has used an economic-led growth strategy to determine the level of growth appropriate for the plan, 'Economic Assessment and Employment Land Study' (Peter Brett Associates). The authority's economic led scenario approaches the need for housing based on job growth and projected economic activity rates to identify the required working age population to support jobs (Growth option 'EE adj.+' projects a net increase of 3,850 jobs which equates to 8,027 homes over the plan period). This is a different approach to the Welsh Government's population and household projections which are based on assumptions of natural change, migration and household formation to identify the potential population and subsequent household demand. Whilst the two sets of projections are not directly comparable, the council has used assumptions from the latest Welsh government projections (2008 base) in its economic calculations. Therefore, there is not an issue of 'soundness' regarding PPW and diverging from assumptions used, i.e. migration rates.</p> <p>The economic study is generally supported, alongside the Council's aspirations to improve economic activity and increase the resident labour force. We make the following observations regarding the Study's methodology:</p> <p>a) Calculations There appear to be a number of incorrect calculations in Table 7.11 of the Economic Study from criteria g. onwards (e.g. if $g=f \times 1.37$, therefore $61,520 \times 1.37 = 84,282$). This will increase the number of additional dwellings required.</p> <p>b) Unemployment</p>

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							<p>The Economic Study uses a number of employment components to generate a housing requirement. Row e of Table 7.11 'Net decrease in unemployment 2011-2026' makes an assumption that unemployment will reduce to the Welsh average. Whilst we acknowledge this is planning positively for the future it is unclear what the implications would be if the reduction of unemployment is not achieved, i.e. potentially an increase in in-migration to fill the jobs which in turn will generate a need for additional dwellings.</p> <p>c) Household size Row j of Table 7.11 in the Peter Brett Report bases the calculation on an average household size of 1.98 in 2026. The Local Authority Household Projections for Wales 2008 project the average household size in 2026 to be 1.97 for Neath Port Talbot. This again would result in a higher dwelling requirement.</p> <p>If the authority re-ran the data based on the 2011 household projections it is likely that the average household size will be higher than the 2008 projections. However, as the authority acknowledges in the Population and Housing Topic Paper (paragraph 4.2.67) this is likely to be caused by the economic recession generating 'hidden households' and latent, unmet demand. It may therefore be inappropriate to utilise a higher ratio.</p> <p>d) Households to dwellings ratio (vacancy rate) Row k assumes a 1:1 ratio of households to homes. The table on pages 69 and 70 of the Population and Housing Topic Paper states that a 3% vacancy rate has been applied to the baseline figure. This is inconsistent with Table 7.11 in the Peter Brett study. The Welsh Government has previously indicated a conversion ratio of 1.04 dwellings per household. This enables vacancy rates, churn in the housing market and an element of 'hidden' households to be accommodated. The authority has identified that a vacancy rate of 4% would be appropriate for the authority. Whilst the empty homes initiative will assist people in accessing housing (115 units) it is not clear whether this will provide a net gain of homes. Double counting of the existing housing stock should be avoided. Applying factors a), b) & c) above results in a housing requirement of approximately 8,560 dwellings, approximately 500 dwellings above that contained in Table 7.11 .</p>
Dep931		Oak Regeneration Incorporated	589629	Object	Growth Strategy	2.4	<p>PLAN STRATEGY</p> <p>Figure 1 sets out some conclusions drawn from the 2008-based local authority projections and shows the percentage change since 2008 by local authority. The figures are illustrative of interaction between employment and housing provision within the region encompassing the local authority areas of Swansea, Neath Port Talbot, Bridgend, Vale of Glamorgan and Cardiff. Together these areas will experience the greatest increase in population over the next plan period when compared to other regions of Wales. In the light of these trends, Oak Regeneration considers that the Plan should include an improved explanation of the influence of the two largest conurbations in Wales on housing supply in NPT County Borough area.</p> <p>Although Oak Regeneration does not dispute the overall approach to the spatial strategy which focuses development along the M4 corridor whilst reinvigorating the Valley communities, the Plan should consider the need to allocate additional housing sites at alternative locations in the context of the wider housing market area and housing demand from the Bridgend County Borough area.</p> <p>Oak Regeneration is concerned that the current focus of development is in the western extremity of the Plan area, and in areas with considerable environmental constraints, namely flood risk and air quality. Parts of the neighbouring coastline also accommodate a number of statutory designations which are sensitive to the pressures associated with increased population. There are also potential issues arising from a housing delivery strategy that is focused on a limited number of sites with a reliance on a small number of developers.</p> <p>Margam's capacity to integrate with neighbouring settlements means that it is well placed to make a contribution to the housing supply and provide a wide range of house types including those that are more suited to an aging population and a reduction in household size. This approach would be consistent with national policy and the 2008 WG population projections which show that from 2011-2026 the majority (c.10,000) of the population increase will be in the over 65s (http://wales.gov.uk/docs/statistics/2010/100527popprojsu08en.pdf). By providing further alternatives for housing development at Margam, the Plan would also help to attract those within the working age profile, which is projected to decrease by c. 2,000</p>

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							<p>residents.</p> <p>In recognising 'housing supply' as a key issue to be tackled, the LDP should also consider the implications of the evolving evidence base. The Plan should provide for further flexibility in housing numbers as an acknowledgment that the evidence supporting the Plan may change, due to the conclusions of the Annual Mid-year Population Estimates for England and Wales, Mid 2011 (http://www.ons.gov.uk/ons/dcp171778277794.pdf).</p> <p>These estimates, which are the first significant release of data pertaining to the 2011 Census, are updated to account for population change during the period between Census day (27 March 2011) and the mid-year point (30 June 2011). Comparisons have been drawn between 2011 Census estimates and population estimates for March 2011 rolled forward from the 2001 data. This analysis identifies significant national level differences in the estimates rolled forward from the 2001 Census, with figures (England and Wales) 476,000 lower than the 2011 Census estimate and an estimated variation of + / - 2.5% for the Neath Port Talbot CBC area.</p> <p>Whilst there is no clear indication to date how these figures will influence the subsequent Assembly Government local authority level projections, these variations emphasise the need for additional flexibility within the plan strategy as a means of complying with the tests of soundness.</p> <p>SUMMARY & CONCLUSION</p> <p>As a consequence of the issues raised as part of this submission, and in the interests of soundness and in particular the provision of sufficient flexibility to deliver the Plan Strategy, it is requested that the County Borough Council consider the following amendments to the current strategy.</p> <p>Growth Strategy</p> <p>Oak Regeneration Inc welcomes the increased growth rate as set out in the Deposit LDP which is now consistent with the 2008 WG Population projections, but requests that the Council further considers the implications of the recent data releases from the 2011 Census, particularly in terms of an additional land allocation at Margam which will provide for additional flexibility within the plan.</p> <p>Housing Sites and Deliverability</p> <p>Oak Regeneration Inc supports the increase in housing supply and housing sites as identified in the Deposit LDP, but would question whether the numbers are sufficient on the grounds of environmental constraints and dependency on a limited number of developers.</p>
Dep793	Mr Peter Williams		787716	Object	Growth Strategy	2.4	<p>I would like to make a general comment on the Local Development Plan 2011-2026.</p> <p>Your intention is to build over 8,000 residential units over the coming years. I have to ask: who are these houses for? We have the lowest birth-rate in the world, our schools are closing or merging and our youngsters are having to emigrate to find work. (An old story but it is more acute now than I can ever remember. This is not your fault of course). I accept that there is always a need for some new housing. But, <i>eight thousand</i> ?</p> <p>One reason you say that we need this development is to help cope with a projected 3,850 new jobs that will arrive (point 2.4.10). These jobs are not coming: in fact, we will be lucky if we hold onto the jobs we have now.</p> <p>The Plan also states (1.0.08) that the Council will seek to conserve landscapes and habitats. This does not tally with our experience. Woodland and duneland have been wantonly destroyed for housing developments. You will know that our town is a by-word for Council destruction, and I fear the worst.</p>

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							Once again: what is the real reason for these developments?
Dep201	Mr Stephen Hall		350649	Object	Paragraph	2.4.4	The WAG 2008 population and household projections are based on pre-recession data and are unlikely to give realistic estimates of trends in the population growth or household size for the area. The Authority's aspirations for future job growth and economic activity are speculative, it would be wrong to build on greenfield sites if future real-world demand for housing does not reflect reality.
Dep3	MS Penny Robinson		778955	Object	Paragraph	2.4.10	<p>3,850 jobs - required 8000 new homes ? Which then has a flexibility factor making it 9,150 ? So almost 3 times more homes than Jobs ???? That's an awful lot of unemployed people or empty houses ! Even with the trend for an aging population and a reducing number of residents per home, this number doesn't make sense.</p> <p>I would love to see a plan that shows when these jobs would come to fruition alongside the later graph that shows when these developments will be built to show that homes will ONLY be built if the economic picture improves</p> <p>I'm also struggling - for the valleys initiative - to see where the growth of jobs is coming from, and don't think the number of properties for area when considering the effort for economic growth in that area is correct.</p>
Dep25	Mr Stephen Hall		350649	Object	Paragraph	2.4.10	The economic-led growth scenario is implausible. If it is based on 2008 data it fails to factor-in the consequences of the present recession. Given that it already takes over a year to sell a house in the County Borough, and that prices are some of the lowest in the UK due to lack of demand, it is very difficult to believe that there is any foreseeable requirement for 8000 additional units, in particular if these are built on green field sites rather than re-using former industrial land. It would be wonderful if our local economy becomes so vibrant that we require the extra housing, but there is little evidence that this is going to happen in the next decade or two.
Dep569	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.4.10	<p>Paragraph 2.4.10 Population, Housing & Economic Growth</p> <p>We note that the Plan projects an increase in jobs of 3850 and with the provision of 8000 new residential units to accommodate the increase of approximately 7000 people. We note that your aspirational 15 year growth figure relies upon key regeneration schemes, one of which is the Strategic Regeneration Area at Harbourside, Port Talbot. We must reiterate our considerable concerns regarding this scheme in the context of flood risk, particularly to third parties as identified within your Strategic Flood Consequences Assessment. This is not in accordance with National Planning Policy as advocated within Technical Advice Note 15 "Development and Flood Risk" (2004) and Planning Policy Wales (2012).</p> <p>There are also potential risks linked to development proposals at this location and the risks associated with air quality impacts upon the Port Talbot Air Quality Management Area. We strongly recommend that your authority revisit this proposal and take a more robust approach in this case.</p> <p>We do support your proactive approach for the utilisation and development of several key Brownfield sites within the County Borough.</p>
Dep6	MS Penny Robinson		778955	Object	Paragraph	2.4.11	All examples are non valley. Doesn't fill me with confidence on the focus for the valley area.
Dep484	Dr Charles Hipkin		785966	Comment	Paragraph	2.4.13	Development of Baglan Bay Energy Park should take into account the incorporation of habitat and species connectivity via the existing/new road networks. It would be both easy and less expensive to incorporate a sympathetic, natural verge system along transport arteries. Exotic shrub/lawn plantings should be avoided. The Energy Park contains a number of important habitats and species that have survived since the earliest developments of this remarkable area. At least one brownfield compartment on the Park could be protected from development to fulfil the function of a translocation or rescue site.
Dep570	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.4.18	<p>Paragraph 2.4.18 Deliverability & Flexibility</p> <p>In paragraph 2.4.10 you state "an additional 8000 new residential units..., by 2026". Yet in paragraph 2.4.18. You state a figure of 9500 residential units. Could this apparent discrepancy be clarified as it has ramifications for the land allocations and</p>

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							requirements?
Dep571	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.4.19	Paragraph 2.4.19 Infrastructure We support the appropriate infrastructure/investment must be in place to support future growth and welcome that " <i>without the provision of improved or new infrastructure, the proposed level of growth will neither be sustainable nor acceptable</i> ".
Dep7	MS Penny Robinson		778955	Object	Paragraph	2.4.21	Again - nothing for valleys?
Dep932		Oak Regeneration Incorporated	589629	Object	Spatial Strategy	2.5	<p>PLAN STRATEGY</p> <p>Figure 1 sets out some conclusions drawn from the 2008-based local authority projections and shows the percentage change since 2008 by local authority. The figures are illustrative of interaction between employment and housing provision within the region encompassing the local authority areas of Swansea, Neath Port Talbot, Bridgend, Vale of Glamorgan and Cardiff. Together these areas will experience the greatest increase in population over the next plan period when compared to other regions of Wales. In the light of these trends, Oak Regeneration considers that the Plan should include an improved explanation of the influence of the two largest conurbations in Wales on housing supply in NPT County Borough area.</p> <p>Although Oak Regeneration does not dispute the overall approach to the spatial strategy which focuses development along the M4 corridor whilst reinvigorating the Valley communities, the Plan should consider the need to allocate additional housing sites at alternative locations in the context of the wider housing market area and housing demand from the Bridgend County Borough area.</p> <p>Oak Regeneration is concerned that the current focus of development is in the western extremity of the Plan area, and in areas with considerable environmental constraints, namely flood risk and air quality. Parts of the neighbouring coastline also accommodate a number of statutory designations which are sensitive to the pressures associated with increased population. There are also potential issues arising from a housing delivery strategy that is focused on a limited number of sites with a reliance on a small number of developers.</p> <p>Margam's capacity to integrate with neighbouring settlements means that it is well placed to make a contribution to the housing supply and provide a wide range of house types including those that are more suited to an aging population and a reduction in household size. This approach would be consistent with national policy and the 2008 WG population projections which show that from 2011-2026 the majority (c.10,000) of the population increase will be in the over 65s (http://wales.gov.uk/docs/statistics/2010/100527popprojsun08en.pdf). By providing further alternatives for housing development at Margam, the Plan would also help to attract those within the working age profile, which is projected to decrease by c. 2,000 residents.</p> <p>In recognising 'housing supply' as a key issue to be tackled, the LDP should also consider the implications of the evolving evidence base. The Plan should provide for further flexibility in housing numbers as an acknowledgment that the evidence supporting the Plan may change, due to the conclusions of the Annual Mid-year Population Estimates for England and Wales, Mid 2011 (http://www.ons.gov.uk/ons/dcp171778277794.pdf).</p> <p>These estimates, which are the first significant release of data pertaining to the 2011 Census, are updated to account for population change during the period between Census day (27 March 2011) and the mid-year point (30 June 2011). Comparisons have been drawn between 2011 Census estimates and population estimates for March 2011 rolled forward from the 2001 data. This analysis identifies significant national level differences in the estimates rolled forward from the 2001 Census, with figures (England and Wales) 476,000 lower than the 2011 Census estimate and an estimated variation of + / - 2.5% for the Neath Port Talbot CBC area.</p> <p>Whilst there is no clear indication to date how these figures will influence the subsequent Assembly Government local authority</p>

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							<p>level projections, these variations emphasise the need for additional flexibility within the plan strategy as a means of complying with the tests of soundness.</p> <p>SUMMARY & CONCLUSION</p> <p>As a consequence of the issues raised as part of this submission, and in the interests of soundness and in particular the provision of sufficient flexibility to deliver the Plan Strategy, it is requested that the County Borough Council consider the following amendments to the current strategy.</p> <p><i>Spatial Strategy</i></p> <p>The Deposit plan should give further consideration to the interaction between employment and housing provision at the wider regional scale and have regard to cross boundary housing supply and demand issues. Further housing allocations at alternative locations such as Margam would:</p> <ul style="list-style-type: none"> • Provide a choice of housing closer to Bridgend and Cardiff; and • Avoid areas of environmental constraints particularly areas of flood risk and with air quality issues along the M4 corridor.
Dep1252	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	2.5.3	<p>The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact:</p> <p>2.5.3 - Spatial Strategy</p> <p>" <u>A more flexible approach</u> to development in the valleys compared to the coastal corridor <u>will also help to reinvigorate communities</u> through small scale retail and employment opportunities".</p>
Dep573	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.5.4	<p>Paragraph 2.5.4</p> <p>We welcome the clarification that settlement limits will be used to provide clarity of where development may be directed.</p>
Dep8	MS Penny Robinson		778955	Object	Paragraph	2.5.6	<p>As per 2.5.7 - majority of investment is in the coastal corridor. I agree that the valleys have a strong community spirit, and are rich in culture and natural heritage. Smothering it with new build housing will spoil that, and I'm not seeing enough economic investment to justify the level of house building - particularly in Pontardawe and the surrounds.</p>
Dep574	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.5.16	<p>Paragraph 2.5.16 Social and Environmental Considerations</p> <p>We support the tenor of this strong approach to environmental matters/issues.</p>
Dep575	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.5.17	<p>Paragraph 2.5.17</p> <p>The reference to development in flood risk areas seems confusing as it implies that this is acceptable as long as there is mitigation. These areas should be avoided as advocated and in accordance with TAN 15 and Planning Policy Wales.</p>
Dep576	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.5.20	<p>Paragraph 2.5.20</p> <p>Again we notice that Harbourside is a key development within the LDP but we continue to lodge our concerns with this proposal due to uncertainty regarding flood risk and potential adverse impacts upon air quality. Please refer to comments for Paragraph 2.4.10.</p>
Dep806		Associated British	587221	Object	Paragraph	2.5.23	<p>Port Talbot Docks are a long established operation and are a very important economic and commercial asset to the area providing</p>

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		Ports					<p>a wide variety of port related facilities and jobs as recognised by paragraph 1.1.10 of the LDP. That paragraph recognises the importance of the port infrastructure and the opportunity that such infrastructure provides. However, this is not followed up coherently throughout the LDP. The Docks offer a significant opportunity with regard to cargo transit and, in accordance with ABP's estate management proposals for the future the LDP should reference those opportunities and support ABP to improve its existing facilities and operations where possible and appropriate in terms of the role the Docks play in bulk handling, warehousing and storage facilities, the attraction of inward investment for manufacturing and other industries and the development of energy and infrastructure projects within its landholdings in support of the objectives and targets outlined in the Climate Change Strategy for Wales. The LDP should also, however, recognise that potential opportunities exist within the Docks for regeneration schemes including mixed use developments that could compliment the Harbourside proposals.</p> <p>It is therefore suggested that the following wording is included at the end of paragraph 2.5.23 of the 'Strategy' Section of the LDP:</p> <p><i>"The LDP Strategy also recognises the economic importance of the existing and long established port operations located at Port Talbot Docks and it seeks to support the continued improvement of Dock facilities and operations including the development of energy and infrastructure projects that are compatible with dock operations and associated land uses and the attraction of inward investment for manufacturing and other industries, whilst at the same time being aware of the potential that land at the Docks has for accommodating future mixed use regeneration schemes that could compliment the Harbourside proposals"</i>.</p>
Dep577	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.5.31	<p>Paragraph 2.5.31</p> <p>We welcome this concept and ask that your authority incorporate the Ecosystems approach as advocated by Welsh Government.</p>
Dep9	MS Penny Robinson		778955	Object	Paragraph	2.5.34	<p>The tourism initiatives are either already complete (so why are they in this plan?) or are minor. This really is either old news or not innovative enough. There is NO new improvements for tourism, community or leisure facilities for Pontardawe that isn't complete, and there are no real answers to the diversification of the economy referenced in 2.5.33. So why and how can you justify 355 new homes in Pontardawe and surrounds.</p>
Dep10	MS Penny Robinson		778955	Object	Paragraph	2.5.35	<p>How does the development in Pontardawe and Upper Neath valley reinvigorate the valleys ? An urban sprawl isn't a tourist attraction, empty houses wouldn't be a tourist attraction, having higher unemployment because people have houses but not jobs doesn't reinvigorate anything.</p> <p>Through out this document there is just references in the Pontardawe and Upper Neath area to new builds but not to any new plans to improve the leisure, transport, or jobs market. The case for house building is never truly made.</p>
Dep11	MS Penny Robinson		778955	Object	Paragraph	2.5.38	<p>Improve Pontardawe by actually having a direct bus route from Pontardawe to Swansea without having to go via Morriston or Neath and change. It would encourage sustainable transport, and encourage people in as well as improving the opportunities for the local community to find jobs in the wider "City Region".</p>
Dep12	MS Penny Robinson		778955	Object	Paragraph	2.5.40	<p>This statement doesn't provide anything concrete. "A more flexible approach to employment proposals " ??? There is nothing in this plan for additional economic growth - once again - so no justification or need for 355 new houses in the area.</p>
Dep13	MS Penny Robinson		778955	Object	Paragraph	2.5.41	<p>"Evident Demand"! The case has not been made for any demand. Whilst writing this, I quickly checked one estate agent website. There are currently 1,238 houses for sale under £175k within Pontardawe and 3 miles radius. If there are that number of homes that are currently not being sold, why would an additional 355 be needed ?</p> <p>Building houses does not boost the local economy. Just results in a reduced community spirit, more derelict properties and a reduced standard of living.</p>
Dep384	Mr H G Rees		785388	Object	Paragraph	2.5.49	<p>Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p>

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							<p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes.</p> <p>Paragraph 2.5.49 should be amended to recognise the role that housing will play in regeneration and enabling re-development of the Estate.</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p> <p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play in the regeneration of the Upper Neath Valley and beyond.</p> <p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p> <p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the</p>

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							<p>whole site.</p> <p>Comment</p> <p>It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan - having said which these comments use Rheola as an example that may not be repeated elsewhere.</p> <p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in the Western Valleys Strategy initiate recognised this and it is argued that OB6 should make explicit reference to Rheola.</p> <p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to 'drag' economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.</p>
Dep14	MS Penny Robinson		778955	Object	Paragraph	2.5.50	As in many other paragraphs - Sustained economic growth is not generated by house building. Unless there is a real focus in investment on new business opportunities, there is no need for new housing. And do I want to live in a sprawling metropolis ? No. So build another 355 homes in Pontardawe and some of the current residence - who are here and supporting the local community because they like the character and rural nature of the area - may add to the decline and out migration.
Dep578	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.5.52	<p>Paragraph 2.5.52</p> <p>We support farm diversification for tourist related activities and small workshop units.</p>
Dep15	MS Penny Robinson		778955	Object	Paragraph	2.5.55	Most of the leisure initiatives are complete and shouldn't be reiterated in the plan. I appreciate it was meant to cover 2011 - 2026 but if the majority of the limited number of items are done by 2012, then that doesn't say much about the level of interest or commitment or investment in building the tourist industry wider. What is being done 2014 - 2026?
Dep579	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	2.5.55	<p>Paragraph 2.5.55</p> <p>We note that Rheola is identified as a key tourist development site but we continue to express our concerns as to the potential associated flood risk of the site which may have implications for the final nature of any development.</p>
Dep580	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	2.5.56	<p>Paragraph 2.5.56</p> <p>We support the development of the Afan Valley for tourist and recreational activities.</p>
Dep395	Mr Sam Hawking		785482	Object	Overarching Policies	3	<p>We believe that, just as there are policies for the protection of listed buildings, areas of natural beauty etc within the Plan, so should there be a policy specifically for the protection of what surely is one of the key features of this part of Wales, namely villages that often sprung up out of mining activity but that are just hanging on to a level of sustainability.</p> <p>If this argument is accepted there now becomes the imperative to identify in each of the marginal villages or settlements how close to danger each one lies and what can be done to intervene or encourage market intervention to safeguard the future. Again this statement does not go far enough and does not deal with replacing or boosting housing supply land adjacent to currently viable but vulnerable community centres.</p> <p>The discussion about how NPT have assessed the potential for settlement expansion is fine in itself, and even includes "<i>opportunities for the intensification of existing areas (also known as 'garden-grabbing')</i>", unless set against the sort of policy we propose there is not going to be the proactive search for sites to rescue villages that we are seeking and suggest is vital to the success of these small communities. NPT do not need the agreement of land owners to include their land in such settlement changes. Market forces will naturally come into play.</p> <p>We suggest that the new policy we seek does not need to be complex but would contain the following key proactive elements:</p> <ul style="list-style-type: none"> the requirement of the LPA to identify each 'vulnerable' village in their list

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							<ul style="list-style-type: none"> the requirement of the LPA for each community in this specific list to identify in the LDP the key existing elements that have enabled the community to 'hang on' thus far, such as Post Office, shop, local school, health centre/GP surgery, small business unit, factory, church, bus route, open space, etc summarise the existing housing and mix therein identify what is missing and needs to be provided or strengthened <i>either</i> identify opportunity sites for this strategy to be implemented, <i>or</i> give priority or special consideration to sites that would promote the success of the community into the future. Specifically we feel the need for further appropriate housing in the close (walk-able) locality.
Dep1253	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	3.0.9	<p>The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact:</p> <p>3.0.9 " <u>The development of sustainable communities</u> , either newly-built settlements such as Coed Darcy or <u>through the enhancement and improvement of existing settlements is a fundamental element of the LDP's strategic approach</u> . Policy SP3 has been underpinned by a <u>comprehensive review of settlements establishing the current role and function of each individual settlement</u> , identifying the functional relationships between settlements, and establishing the potential future roles of each settlement".</p> <p>(<i>Note: The Comprehensive Review is obviously flawed - see comment in paragraph 2 above</i>).</p>
Dep1259	Mrs J Owen		457958	Object	Paragraph	3.0.12	<p>"With the exception of dormitory settlements" should be removed from paragraph 3.0.12. There is no clear justification within the Plan for restricting development within dormitory settlements to the same degree that it is restricted in open countryside. Policy SC1 is clear that development within settlement limits must be proportionate in scale and form to the role and function of the settlement. This would serve to restrict inappropriate development within dormitory settlements but allow sufficient flexibility for small, well planned developments that could assist in meeting the identified housing needs across the County Borough.</p>
Dep398	Ms Rose Freeman	The Theatres Trust	196293	Object	Paragraph	3.0.19	<p>We have one comment that does not affect soundness although it could come under the heading of Effectiveness, if necessary. The examples given in para.3.0.19 do not provide adequate guidance for a description of the term 'community facilities' and we suggest that this paragraph is amended so that guidelines are clear and consistent, and recommend this succinct all-inclusive description which would obviate the need to provide examples: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</p>
Dep590	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	3.0.28	<p>Paragraph 3.0.28 Community Infrastructure Levy (CIL)</p> <p>Could sewerage be included in this paragraph in relation to "Where developments generate a need for improvements to existing or require new infrastructure, such as highway improvements, sewerage , promotion of.....".</p>
Dep592	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	4.0.4	<p>Paragraph 4.0.4</p> <p>It is stated that the Strategic Regeneration Areas (SRA) (incl. Harbourside) will make a significant contribution to delivering the LDP strategy. Again, we would raise our concerns that this development is being promoted when flood risk has not been fully quantified and it may be mitigation is not possible due to third party detriment.</p>
Dep834	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	Paragraph	4.0.5	<p>To allow the best use to be made of the site (or to ensure that land use mix is not unintentionally constrained) we recommend that there is a small change to the end of the supporting text. This will allow the allocation to be flexible enough to capture a broader range of uses that would complement the innovation campus concept and improve the overall performance of the site.</p> <p>The additional text we propose to 4.0.5 is underlined below:</p> <p><i>"Outline Planning Permission was granted in August 2012 for the Science and Innovation Campus for Swansea University, with facilities for academic, university residential uses, industrial/research and development (R&D) space (Use Class B1). It will</i></p>

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							<p>include capacity to accommodate up to 4,000 full time student residents, with academic facilities for a total of up to 5,100 students. Reserved matters were subsequently approved for Phase 1 in December 2012. The remainder of the site allows for further expansion of this Integrated research/education campus facility, which also has the potential to extend beyond the Authority's boundary to the west. <u>There is also scope for other uses where these either support the development and success of the campus or are on land which is clearly not needed for educational or ancillary use</u> . The development is seen as significant in terms of attaining the aspirations and key principles for socio-economic growth in the region....." .</p> <p>This sequence does not threaten the allocation or the primary purpose of the Transit site which is to develop and sustain the innovation campus. It would, however, reflect the clear potential of the land to accommodate development in an accessible and sustainable location. The campus will be very well connected to the local and strategic transport network, and will include amenities and significant employment and educational opportunities. Development there can also take place on land which has already been "franked" for some form of substantial activity. Most campuses also include a mixture of uses which will sustain activity and investment across the full calendar year.</p> <p>An alternative approach would be to draw settlement limits around the edge of the campus allocation which would allow a broader range of uses to be positively considered.</p>
Dep26	Mr Stephen Hall		350649	Support	Paragraph	4.0.12	The Harbourside SRA is a very welcome proposal that offers significant benefit to Port Talbot and the wider region. There are few deep water harbours on the Bristol Channel and future opportunities should be sought for expanded trade. I hope that the plans will include public access to the waterfront with a mix of residential, leisure and retail opportunities.
Dep595	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	4.0.12	<p>Paragraph 4.0.12</p> <p>The Afon Afan river corridor and the existing reed bed area within the docks are important for migration, foraging and shelter for a wide range of species, and the otter, which is a European Protected Species, is known to use this area. "Environmental regeneration" needs to acknowledge the importance of these habitats, by protecting and enhancing them.</p>
Dep808		Associated British Ports	587221	Object	Paragraph	4.0.15	<p>The Harbourside Strategic Regeneration Area Site Allocation (Policy Ref: SRA2) is located adjacent to land under AB Ports ownership at Port Talbot Docks.</p> <p>Port Talbot Docks are a long established operation and are a very important economic and commercial asset to the area providing a wide variety of port related facilities and jobs. ABP are keen to ensure that the economic importance of the Port is fully recognised in the LDP and seeks to ensure that land which abuts the docks area is not developed for any land use that would directly conflict, or be highly sensitive to port operations or future port related development. Whilst it is noted that paragraph 4.0.12 indicates that the proposals for Harbourside include the continuation of the operation of the Docks and the Harbour, ABP feel that the LDP should further reflect the above.</p> <p>As such wording should be added to paragraph 4.0.15 "...and these should have regard to the continued operation of the Docks" .</p>
Dep596	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	4.0.21	<p>Paragraphs 4.0.21 & 4.0.22 Glanafan Comprehensive School Mixed Use Regeneration Scheme, Port Talbot</p> <p>This site is located in an area of flood risk (zone C1). As such, any development proposal will have to be supported by a detailed Flood Consequence Assessment (FCA) to assess the risk.</p>
Dep16	MS Penny Robinson		778955	Object	Paragraph	4.0.23	How does additional housing rather than a Lido encourage tourism ? Unsound argument.
Dep18	MS Penny Robinson		778955	Object	Paragraph	4.0.28	Pontardawe does not have the facilities, amenities, infrastructure or need to support significant additional growth - there is no evidence in this plan that shows this - particularly as there are no plans for further economic investment in Pontardawe to encourage additional jobs.
Dep598	Mr David	Natural Resources Wales	786443	Object	Paragraph	4.0.28	Paragraph 4.0.28 Pontardawe Strategic Growth Area

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	Watkins						Parts of Pontardawe are at risk of flooding. Any development proposals in these areas will have to be supported by a Flood Consequence Assessment (FCA) to assess the risk.
Dep532	Mr H G Rees		785388	Object	Paragraph	4.0.30	<p>Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p> <p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes.</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p> <p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play in the regeneration of the Upper Neath Valley and beyond.</p> <p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p> <p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the</p>

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							<p>long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the whole site.</p> <p>Comment</p> <p>It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan – having said which these comments use Rheola as an example that may not be repeated elsewhere.</p> <p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in the Western Valleys Strategy initiative recognised this and it is argued that OB6 should make explicit reference to Rheola.</p>

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							<p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to ‘drag’ economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion</p> <p>Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.</p> <p>Changes should be made to paragraph 4.0.30</p>
Dep535	Mr H G Rees		785388	Object	Paragraph	4.0.30	<p>Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p> <p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes.</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p> <p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play in the regeneration of the Upper Neath Valley and beyond.</p>

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							<p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p> <p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the whole site.</p> <p>Comment It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan – having said which these comments use Rheola as an example that may not be repeated elsewhere.</p> <p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis</p>

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							<p>of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in the Western Valleys Strategy initiative recognised this and it is argued that OB6 should make explicit reference to Rheola.</p> <p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to ‘drag’ economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion</p> <p>Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.</p> <p>A new paragraph should be added after 4.0.30 setting out similar comments to 5.2.62</p>
Dep240	Mr Paul Bulmer		345444	Object	Communities and Housing	5.1	In the past you have talked about houses for senior citizens within Bryn which would allow them to stay local and free up larger houses within Bryn for families. Myself and others have always agreed with you on this suggestion but again I can not see any such proposal within the LDP.
Dep749	Mr Keith Miller		278706	Object	Communities and Housing	5.1	We would encourage and support a new policy that recognises the role that self-build schemes can play in contributing not only to the housing market but also to the economy.
Dep19	MS Penny Robinson		778955	Object	Paragraph	5.1.2	The case for the economic growth without any new economic investment is not made for Pontardawe. The reduction in unemployment is equally unsound. The demographic changes and factor such as an aging population or more single households does not suggest a growing population that will be able to afford to by new homes. So at best, Pontardawe may need some more residential care homes or more houses to rent, but certainly the assumption that there is sufficient population or economic growth in Pontardawe to justify 355 homes is not sound.
Dep687	Mr. Sam Hawking and Mr. Dan		787198	Object	Paragraph	5.1.6	<p>3. Policy framework</p> <p>3.01 The current UDP settlement boundary includes much of the subject land in the settlement boundary. To achieve this the</p>

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	Madge						<p>planning consented sites and actual building plot in this particular location were included.</p> <p>3.02 Paragraph 5.1.6 of the LDP states the following "Allowances - these sites will not be specifically identified within the Plan, but the contribution they will be expected to make will be accounted for by incorporating an allowance into the overall housing provision. These sites have been calculated based on past trends, the settlement hierarchy and the results of the urban capacity study. They comprise:</p> <ul style="list-style-type: none"> • Windfalls - sites of 10 residential units or more which may comprise previously developed sites which may unexpectedly become available over the Plan period. • Small Sites - sites with a capacity of less than 10 residential units which comprise of previously undeveloped land and small windfall sites (that are unforeseen)" <p>3.03 Lying behind the main LDP is a background paper entitled " LDP Strategic Housing Site Assessment Report August 2013". As the name suggests it sets out the systems and procedures used to identify and assess sites for, among other things, the new LDP settlement limits.</p> <p>3.04 Within this clauses 3.1.1 & 3.1.2 state: "In order to ensure that the land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP the Council has taken a significant number of sites into consideration, including those UDP allocations that currently remain undeveloped which do not have a 'live' planning permission. It should be emphasized however that the assessment itself was not designed to provide detailed technical assessment on a site-by-site basis; the process simply provided a comprehensive overview of the development potential of sites and critically is based on the best information available at the time of the Plan preparation." (their emphasis)</p> <p>Following these statements there is table 3.1 "Detailed site analysis" which shows how sites were assessed.</p> <p>3.05 Clause 3.2.1 states that: "the report concentrates on "the stage 4: detailed assessment, and considers the following:</p> <ul style="list-style-type: none"> • Those Candidate Sites that reached Level 4 of the Methodology • Those UDP allocations that currently remain undeveloped which do not have 'live' planning permission, and • Additional sites that were considered worthy of assessment <p>3.06 Nowhere that we could find is there a statement about the necessity of a current planning consent being in place for a site to survive. However, the following clause 3.2.2. states: "Given that such (landbank) sites have a 'live' planning consent the sites were not scrutinised and subjected to the same level of assessment".</p> <p>3.07 Close discussion and analysis with the NPT staff however has identified that where small sites on the edge of settlement limits have a lapsed planning consent they are automatically removed from the LDP settlement limit. The view of the LPA officers is that the owners have shown no evidence of wishing to pursue the sites and thus other sites should take their place. It appears that in fact no "stringent assessment" takes place.</p> <p>3.08 We have argued in another very similar objection (62 Afon Road, Duffryn) that a wide range of housing sites is required to maintain inward investment and community growth around existing settlements without placing further pressure on green belt and open countryside. Thus, in our view, LPAs should actively include small sites that are 'gaps' within existing well-established settlements and not be fighting any increases beyond allocations that can be made from 'theoretical' sites that actually remain undeveloped for countless years. And as they state, such sites, without any planning consents, are retained despite total inactivity. The LPA being ahead of developers is a positive benefit in this case.</p> <p>3.09 We therefore suggest that a paragraph is inserted of this nature: "Unless there is some significant change of circumstance that would render a small site no longer 'sustainable' or would fail another criterion of the site selection process, such small sites where planning consent has lapsed but are within the previous settlement boundary shall remain within the settlement boundary</p>

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							and shall not be automatically removed."
Dep348	Mrs A Williams		196333	Object	Paragraph	5.1.8	<p>I believe the LDP is unsound because of the unequal share-out of regeneration. The spatial strategy focuses on the coastal belt and the Neath and Swansea Valley areas as providing what is described as the 'ripple effect' out towards the surrounding Valley Communities. There is insufficient evidence that this will be of any benefit.</p> <p>In order to address the patterns of unsustainability and deprivation of Valley Communities, one solution would be to lift or make flexible existing settlement boundaries. This would, at least, provide the opportunity for development, as once adopted, the life of the LDP will shape the future growth of areas and communities for many years and if nothing is done at this stage, a great disservice will be done to the Valley Communities.</p>
Dep210	Mr John W John		782842	Object	Paragraph	5.1.8	<p>The Plan fails to deliver a coherent land supply and is inflexible. Table 5.3 (Page 38) shows: 0 new allocations in the Afan Valley; 0 land banks in the Afan Valley; 60 windfall for the whole of the Afan Valley to 2026; and 65 small sites for the whole of the Afan Valley to 2026. The land captured within the settlement limit is very much that within the UDP (i.e. it has not been developed and is not likely to be developed).</p> <p>The Plan discusses the coastal plain. Major development led by economic success projected forward across the Plan.</p> <p>The valleys outline Reinvigoration of the valleys. How? There is very little new housing and very little new industry. No evidence of looking forward and projecting success, this projects at best survival for the valleys.</p> <p>The approaches are not only divergent for the valleys and coast but complete opposites at variance and therefore not logical and cohesive.</p> <p>In terms of flexibility, the limited number of houses gives no flexibility and is unsustainable. The numbers of houses provided in the Plan falls short of the Welsh Government figures and this indicates a meagre approach to land supply. Without building there is no reinvigoration.</p>
Dep505	Mr & Mrs A Golding		196295	Object	Paragraph	5.1.8	<p>The Plan is unsound, flawed and not flexible enough - it states in many places that it supports all valley communities (see references below) - we hear what The Plan is saying in writing but do not see it on the ground. The Plan needs to be amended to include development of the 'settlement hierarchy' villages to support and reinvigorate village communities.</p> <p>It does not encourage enough growth in the Valleys, does not recognise that smaller villages have communities nor have a policy that reinvigorates the smaller village communities in particularly in the Neath Valley.</p> <p>This is shown in it's Settlement Strategy - 'settlement hierarchy' discounts villages as having 'limited infill opportunities only' even though a development could be considered that would use and support the sustainability of the 'hubs' - only 4 residential developments have been approved in the Neath Valley and all of these are in the Glynneath 'hub' (P41 5.1.10 see attached No.1) and of these - 3 were already in the UDP.</p> <p>The 'infill only' policy implemented in the UDP resulted in only individually built executive homes being built along the Neath Valley corridor from Resolven to Clyne following the UDP. By discounting villages in the 'settlement hierarchy' it does not plan for their recovery.</p> <p>Over the past 10yrs or so many smaller villages have lost services such as local shop, post office, school etc. If there was a policy within The Plan that would allow for these smaller villages to be developed it would enable the community to retain it's current services and THRIVE and not just struggle to SURVIVE over the next 10yrs.</p> <p>Many of the main services for villages would continue to support these 'hubs' and their regeneration. Other services within the Borough are being centralised - a 'Super School' is being built in Port Talbot that will close 3 comprehensive schools in the area. In the Neath Valley a new Super Medical Centre is proposed for Glynneath that will service communities down to the village of</p>

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							<p>Clyne (my village) that is only 6.7mls away and on a direct bus route.</p> <p>We can understand that centralisation is necessary for a number of reasons but cannot accept centralisation of population - villages do not have to be 'sustainable' to be developed in a generation of centralisation. Without regeneration villages will no doubt be downgraded to 'dormitory' in a subsequent plan - will lose it's community and face the danger of become family free.</p>
Dep645	Mr V Price		196316	Object	Paragraph	5.1.8	<p>The strategy aims to re-invigorate the valleys area, but allocates no land within three of the valleys (two of which have no land bank sites either). This approach does not conform to the strategy.</p> <p>We are also concerned about the amount of development allocated to settlements within the coastal corridor but which share some characteristics of the valleys, such as Bryn. Its accessibility to Port Talbot and Maesteg suggest it requires more development than it has been allocated.</p>
Dep449	Mr Tony Brinkworth		218483	Object	Paragraph	5.1.8	<p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states:</p> <p>In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well- being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity.</p> <p>How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement</p> <p>I have just seen my site N90 in the LDP Candidate Site Assessment Report (August 2013). The reason for exclusion from the settlement limit is that "The site lies in open countryside detached from the existing settlement, in an unsustainable location and therefore not in accordance with the settlement strategy. Parts of the site contain areas of significant biodiversity value.</p> <p>I believe they have not been comprehensive in carrying out the Assessment of site N90/218483, due to the wording "immediately adjacent to a settlement limit". Therefore my site has not been fully assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regards to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because "The site lies in the open countryside detached from the existing settlement, in an unsustainable location The Council are considering 300 houses just over 1 field away on a greenfield site - candidate site N35. I see no mention of countryside only greenfield, and no mention of unsustainable location and biodiversity value. Surely part brownfield sites should be considered first as opposed to building on higher grade land in the open countryside.</p> <p>This would allow for a full assessment to be made on Candidate site N90, for one of the first Code 6 of the code for sustainable homes to be built in Wales if not the UK with onsite renewable energy and giving a 10 acre improvement in biodiversity, on a part brownfield site.</p> <p>The Council only seem to be interested in large sites for example, 300/400 houses just only 1-2 fields away to site N90. My proposed site will be more beneficial to sustainability, climate change and biodiversity improvements than any one of these proposed houses.</p> <p>I also believe the allocation of sites are not transparent and delivered in accordance of the Delivery Agreement. Site allocations should not incline to be for large housing estates.</p>
Dep457	Mr Tony Brinkworth		218483	Object	Paragraph	5.1.8	<p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states:</p> <p>In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well- being and</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity. How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement.</p> <p>I have just seen my site N37 in the LDP Candidate Site Assessment Report (August 2013). The reason for rejection is "The site is located in the open countryside divorced from any existing settlement and will therefore be dealt with through the Development Control process"</p> <p>I believe they have not been comprehensive in carrying out the Assessment of site N37, due to wording "immediately adjacent to a settlement limit". Therefore my site has not been assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regard to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because it is divorced from the existing settlement..... This would allow for an assessment to be made on Candidate site N37, for one of the first code 6 of the code for sustainable homes to be built in Wales if not the UK with on site renewable energy and giving a 10 acre improvement in biodiversity, on a derelict part contaminated brownfield site.</p> <p>The concept is to build one of the first code 6 of the code for Sustainable Homes with onsite renewable energy, to be built in Wales if not the UK on a derelict part contaminated brownfield site, with a 10 acre improvement in the adjoining woodland via Better Woodlands for Wales' Management Plan.</p>
Dep454	Mr Tony Brinkworth		218483	Object	Paragraph	5.1.8	<p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states:</p> <p>In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well-being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity. How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement.</p> <p>I have just seen my site N92 in the LDP Candidate Site Assessment Report (August 2013). The reason for exclusion from the settlement limit is that "The site lies in the open countryside detached from the existing settlement, in an unsustainable location and therefore not in accordance with the settlement strategy. Parts of the site contain areas of significant biodiversity value.</p> <p>I believe they have not been comprehensive in carrying out the Assessment of site N92/218483, due to the wording "immediately adjacent to a settlement limit". Therefore my site has not been fully assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regards to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because "The site lies in the open countryside detached from the existing settlement, in an unsustainable location" The Council are considering 300/400 houses just over 1 field away on a greenfield site - candidate site N35. I see no mention of countryside only greenfield, no mention of unsustainable location and biodiversity value. Surely part brownfield sites should be considered first as opposed to building on higher grade land in the open countryside.</p> <p>This would allow for a full assessment to be made on Candidate site N92, for a few sustainable houses to code 5/6 of the code for sustainable homes with onsite renewable energy savings on a part brownfield site.</p> <p>The Council only seem to be interested in large sites for example, 300/400 houses just only 1-2 fields away to site N92. My proposed site will be more beneficial to sustainability, climate change and biodiversity improvements than any one of these proposed houses.</p> <p>I believe the allocation of sites is not transparent and delivered in accordance of the Delivery Agreement. Site allocations should</p>

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							not incline to be for large housing estates. Having a mixture of housing on a new estate is ok, but there is also a need for individually designed homes such as this site could give to the self builder, they may want to create something tailored to their family's unique requirements; or something architecturally appealing, or because they want to live in a home that they might not be able to afford on the open market. For many, self build is a chance to create the life they have always dreamed of.
Dep378	Mr Clive Rogers		255156	Object	Paragraph	5.1.8	Having gone through your website www.npt.gov.uk/ldp in regards to submitting an Alternative Site Form and redaing them all, then selecting the topic paper overview page 79 'Glyncorwg has a good range of services' yet there is no sign of housing development in this area. Paragraph 9.4.3.3 of the Housing Topic Paper states the current position forward indicator. Paragraph 8.1.4 states some sites may be subject to delays! Paragraph 5.1.8 (Table 5.3) of the LDP states that there are zero new allocations for the Upper Afan Valley. Flexibility would help us in all aspects of regeneration in Glyncorwg and the Upper Afan Valley which is developing but at a slow rate. Afan Argoed, Glyncorwg Cycle Centre, Glyncorwg and Croeserw Enterprise Parks are good examples.
Dep497	Mr John Doran		286649	Object	Paragraph	5.1.8	We feel that this site was not given fair consideration as a candidate site and was mixed up with other candidate sites in the area and was referred to as being located in Cwmgors. The site adjoins new and/or proposed development and showed a plan of a maximum of 11 new dwellings not as described in the decision which states "The inclusion of such a large site in the valleys is not supported as it is out of accord with the spatial strategy". We feel that because it is in a rural area and we are small developers we were not afforded equal opportunities as the larger developers on larger sites.
Dep466	Mr Gary Pugh		322271	Object	Paragraph	5.1.8	Paragraph 5.1.8 and table 5.3 show 4.3% of growth and land provision in the Swansea Valley but the majority will be delivered at the Dewhirst site at Ystalyfera. Only 25 and 75 units are to be built / windfall across the whole of the Swansea Valley. Paragraph 5.1.8 - There is little new housing and little employment and these add up to reinvigoration? They do not. The inclusion of Phase 1 will go someway to promoting the recovery that is needed in the valleys.
Dep385	Mr Paul Gregory		785354	Object	Paragraph	5.1.8	We would request that "focussed changes" are made to the Local Development Plan "LDP" to address its soundness, to confirm a flexibility of supply and to provide a variety of sites over the phasing in life of the plan. Furthermore, we consider that under the Unitary Development Plan UDP, the future needs of the Pontardawe area were not sustainable, whereas for the valley at Pontardawe, the addition of our site in Pontardawe is required. As a small local centre it is ideally placed to be a "healthy sustainable community", greatly benefiting as Pontardawe becomes a stronger economic hub, due to the planned strategic growth and inward economic investment. Our understanding was that some 9150 houses (LHMA) were needed to address the population growth across the County, whilst it has not been possible to calculate the Pontardawe area.
Dep403	Mr and Mrs Richard and Mari Jones		785448	Object	Paragraph	5.1.8	We think that the LDP is misguided and should be changed for a number of reasons. Firstly, as residents of Penyrhiw for over 30 years and in the case of Mari Jones (co-signatory to this objection) who was born in the village, and apart from four years living in the Swansea Valley, has lived in Penyrhiw for over 50 years. We object strongly to the fact that Rhiwfawr has been classed as 'Dormitory Settlement' (Table 3.1) within the LDP. If you are not aware, Rhiwfawr is a Welsh speaking village which had until recently a welsh medium primary school. It would appear from reading the LDP Deposit Plan that NPTCBC is deliberately causing the death of the community of Rhiwfawr by neglect. The Plan appears to contain a number of contradictions, in particular under Environment Strategy for Wales 2006 where it states

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							<p>'by 2006 we want to see a distinctive Welsh environment thriving and contributing to the economy and social well being and health of all people in Wales'.</p> <p>Additionally the LDP talks about the Western Valleys Strategy and the Re invigorating of the Valleys, including the preserving of the spoken Welsh language, yet as stated the LDP seems to contradict these strategies by classing Rhiwfawr as a 'Dormitory Settlement' (3.0.9).</p> <p>It appears that NPTC are watching what is happening in relation to the decline of community and are not intervening as they should as mentioned in the 'Western Valleys Strategy and the Re Invigorating of the valleys'.</p> <p>Having read the letter of responses from the Department of Education and Skills WAG fated 14/7/3011 addressed to Mr Karl Napieralla Director of Education NPTCBC in relation to the Councils proposal to close Rhiwfawr School. It is notes that at paragraph 14 and 29 of the letter, that the costs of maintaining the school was a major significance, and at paragraph 27 it was pointed out that the alternative school YGGD Cwmllynfell was in relatively close proximity to Rhiwfawr. This would appear to be another contradiction in the Re Invigoration of the Valleys.</p> <p>It is our opinion that Rhiwfawr is not a 'Dormitory Settlement' and is a community that thrives from its location in that it is in close proximity to both Cwmllynfell and Cwmtwrch. Additionally within 2 miles there are three large superstores namely Asda in Ystalyfera and Tesco and Co-op in Glanrhyd. There are also a number of restaurants within 2 miles of Rhiwfawr.</p> <p>In addition to the above, residents within Cwmllynfell and Rhiwfawr have access to facilities in neighbouring authorities namely Powys Leisure Centre in Ystradgynlais all within minutes from our homes. There are also theatres and Cinemas in Ystradgynlais and Upper Brynamman, again a mater of minutes.</p> <p>A lot of these facilities are closer to the residents of Rhiwfawr and Cwmllynfell than some of the villages in the Neath and Port Talbot areas.</p> <p>We propose that paragraph 5.1.8 be amended to include Rhiwfawr and not to class it as a 'Dormitory Settlement'.</p>
Dep657	Mr Thomas Zwart		443470	Object	Paragraph	5.1.8	<p>I have read the LDP Settlement Topic Paper, Population and Housing Topic Paper, Economy and Employment Topic Paper, and Candidate Site Assessment Report. They all talk about sustainable communities and revitalisation.</p> <p>Table 5.3 indicates for Port Talbot small sites are only 100 units for the whole of Port Talbot- over 15 years that's nearly nothing. Windfall are unpredictable as acknowledged in the Housing and Topic Paper. I intend to build.</p> <p>The local economy will benefit financially by the number of Candidate sites being approx 385 where the average spend of £100k will bring £38.5m into the local economy. This will provide work and boost local suppliers and shop.</p> <p>My site is close to all facilities and no constraints to developing the site.</p> <p>The plan is not flexible in that most of the allocation of sites in for the large house builder on large sites with no ability for small scale developers to add to the economy and revitalise.</p>
Dep728	Mr T. Williams		787380	Object	Paragraph	5.1.8	<p>Only require a mere extension to settlement limit, enough for one dwelling on boundary of settlement, adjacent to existing land where planning permission granted.</p> <p>I believe that the LDP is unsound. Having read the LDP, Candidate Site Assessment Report, Population and Housing Topic Paper, Settlement Topic paper, Economy and Employment Topic Paper there is not enough land in the Valleys.</p> <ul style="list-style-type: none"> • 65 units in Table 5.3 over 15 years is not reinvigoration as it says in the "vision." • 60 windfall sites are no guarantee of any being developed yet I wish to build.

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							<ul style="list-style-type: none"> • My site is a gateway to the village and as such will be a high quality, well maintained statement property to reflect a new era of reinvigoration • Too many plots are available for large developers and therefore the plan is not flexible. • The Peoples Places Futures, Vibrant Economy, Economic Renewal: A New Direction, Vibrant and Viable Places, Swansea Bay City Region, Economic Growth Strategy, SIP Outcome 3, Western Valleys Strategy, Local Housing Strategy and the Vision all directly state "Valley communities will be supported and revitalised through encouragement of new and expanded economic activity" - how / where? • No industry, no employment that leaves only housing. • Live work only delivers 5 in the monitoring - it has to come from housing. • My site is adjoining, will help a local business continue to farm/ look after animals and maintain the land for future generations. Theft and vandalism and cruelty to stock has almost ended the business. This site will allow not only housing but an agricultural business to thrive. • The Plan is not optimistic, does not plan for vibrancy - as written it merely watches the Valleys die. • The settlement limit policy/ live work allow for extensions from the settlement limit as drawn, I am only asking for the same.
Dep1270	Mr G Billett		198427	Object	Paragraph	5.1.8	I am requesting these amendments because I feel that the existing policy is not flexible & there is far too much emphasis on large scale developments & little consideration given to singular dwellings whose environmental impact is negligible in comparison.
Dep1276	Mr H M Parry & Mr M C Thomas		266933	Object	Paragraph	5.1.8	<p>Shortfall of development land</p> <p>I refer to the Neath Port Talbot LDP and to its tables reporting the extent of land allocated for residential development. From my understanding of the figures presented, it is apparent that the present allocation of such land will not meet the Welsh Government's requirements. It is apparently accepted by the council themselves, that the plan in its present form may therefore have a large shortfall of building plots.</p> <p>I assume the reason for shortfall may be that the council consider there is insufficient land available that conforms to the Welsh Governments particular requirements.</p> <p>In which case I respectfully ask for the alternative site I have proposed be reappraised and in the light of facts in my statement; that virtually dismiss the council's objections; be included in the plan as an alternative and supplemental site for residential development.</p>
Dep1277	Mr H M Parry & Mr M C Thomas		266933	Object	Paragraph	5.1.8	<p><u>Shortfall of Housing Development Land</u></p> <p>I refer to the Neath Port Talbot LDP and to its tables reporting the extent of land allocated for residential development.</p> <p>From my understanding of the figures presented, it is apparent that the present allocation of such land will not meet the Welsh Government's requirements, and that the plan in its present form may well have a large shortfall of building plots.</p> <p>A fact that is apparently accepted by Neath Port Talbot Council.</p> <p>I assume the reason for the shortfall may be that the Council consider there is insufficient land available that conforms to the Welsh Governments particular requirements.</p> <p>In which case I respectfully ask for the alternative site I have proposed be reappraised and in the light of facts in my statement; that virtually dismiss the Council's objections; be included in the plan as an alternative and supplemented site for residential development.</p>
Dep903		Tudor Inn Developments Ltd	318564	Object	Paragraph	5.1.8	There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one at the Former Tudor Inn N18.

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Dep893	Messrs David Julian James and John Wall		787752	Object	Paragraph	5.1.8	There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one at Lakeside (PT12).
Dep901	Julian and Emma James		787828	Object	Paragraph	5.1.8	There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one at Forest Lodge Lane PT19.
Dep896	Marian James		787833	Object	Paragraph	5.1.8	There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one South of Abbots Close PT14.
Dep1273	Mr David Clifford Powell		456093	Object	Paragraph	5.1.8	There is no Land Bank in the Afan Valley. There are no new allocations for the Afan Valley. There are only sixty windfall sites over the plan for the Afan Valley. The Population and Housing Topic Paper, page 58 9.31, 'Historically, new housing provision (from windfalls) had not necessarily been anticipated and would not have been specifically allocated'. This means that Table 5.3 for the Afan Valley is based on guesswork and is being used to constrain development. Small sites are being identified at around seven to eight properties per year. Reinvigorate? Revitalise?
Dep1275	Ms Melanie Morgan		787332	Object	Paragraph	5.1.8	The plan is not coherent or flexible in that there is very little land for small scale developers. This prevents the plan from being flexible which stops any real re-invigation of the valleys.
Dep20	MS Penny Robinson		778955	Object	Paragraph	5.1.11	So based solely on ability to accommodate not NEED or Benefit ?!
Dep618	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.1.38	Paragraph 5.1.38 We agree with your statement that: " <i>Developments..... not cause any unacceptable detriment to the character or landscape of the surrounding area</i> ".
Dep625	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.1.59	Paragraph 5.1.59 The alternative of improving access links to existing open spaces in locations where no new open spaces areas can be provided is supported.
Dep778	Mr Mike Webb	RSPB	420284	Object	Paragraph	5.2.8	The RSPB objects to the lack of consideration of biodiversity in the text accompanying policy EC1/1. Reference is not made to a biodiversity resource of Wales-national importance, viz breeding lapwings. Lapwings are red-listed in Wales, due to steep declines in the breeding population, and are present on a list of species pursuant to s42 of the NRC Act, as a species of principal importance for the purposes of conserving biodiversity. The site holds more than 1% of the Welsh breeding population, and is therefore of Wales-national importance. <u>Tests of Soundness:</u> The deposit draft LDP fails the following tests of soundness: C2: The deposit draft LDP does not have regard to national; policy. Para 5.4.5 (bullet point 7) of Planning policy Wales (2012) states that the development plan should " <i>clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate</i> ". In failing to address the lapwing value of proposed allocation EC1/1, the local planning authority has failed to clarify how biodiversity outside statutorily-designated sites will be safeguarded.

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							<p>Furthermore, para 3.3.2 (bullet point 14) of TAN 5 states that local development plans should <i>"Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies"</i> .</p> <p>The deposit draft LDP has proposed the allocation of EC1/1 in a way which is not consistent with the nature conservation objectives and policies in the plan itself, for example policy EN6, which addresses s42 species.</p> <p>CE2: The deposit draft LDP is not realistic. It is not founded on a robust evidence-base, because it does not address a key biodiversity resource which is of acknowledged concern, and which is a material consideration in development plan formulation.</p> <p>CE3: The deposit draft LDP fails test CE3, because there is no clear mechanism for implementing the protection of breeding lapwings in the context of the development of EC1/1.</p> <p><u>Changes Sought to the LDP :</u></p> <p>Insert a new paragraph between paras 5.2.9 and 5.2.10 which states that <i>"EC1/1 is nationally-important for breeding lapwings, and commits the local planning authority to producing, consulting upon and adopting supplementary planning guidance in the form of a Masterplan (the production of a Masterplan is already a LDP commitment), which will set out how compensatory measures with regard to breeding lapwings will be brought forward in respect of the Lapwing Compensation Site abutting Baglan Bay development area on the west"</i>.</p>
Dep804		Associated British Ports	587221	Object	Paragraph	5.2.22	<p>We note that land under AB Ports ownership at Port Talbot Docks is safeguarded for employment (B1, B2 and B8) uses under Policies EC2 and EC3 (Employment Area Uses) of the Plan. Support is provided to these policies and in particular to EC2/10 which relates to the employment allocation at Llewellyn's Quay, Port Talbot and to the supporting paragraph 5.2.22 to Policy EC3 which indicates that a wider range of uses may be acceptable at existing employment areas.</p> <p>It is however noted that paragraph 5.2.22 makes no reference to the importance of the Docks or the opportunities for economic or commercial development within the dock area. Port Talbot Docks are a long established operation and a very important economic and commercial asset to the area providing a wide variety of port related facilities and jobs. It is therefore considered that the Council should recognise the economic importance of the docks in the LDP and should support ABP to improve its facilities. It should be noted that in addition to the role the docks play in bulk handling and warehousing and storage facilities, ABP are also actively looking to develop energy and infrastructure projects within its landholdings in support of the objectives and targets outlined in the Climate Change Strategy for Wales.</p> <p>It is therefore suggested that the following wording is added to paragraph 5.2.22: <i>"Support is also provided to existing operations located within Port Talbot Docks and the Council will support the associated development of energy and infrastructure projects that are compatible with dock operations and associated land uses"</i> .</p> <p>In addition, the Proposals Map does not make it clear as to the extent of land at the Docks under ABP's ownership that is considered to fall under Policy EC3.</p>
Dep21	MS Penny Robinson		778955	Object	Paragraph	5.2.28	Coastal strategies are specific. Valley strategies are not. There is clearly no real plan on how the economy in the valley region will be revitalised.
Dep1308	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	5.2.34	The Wales Spatial Plan underpins the success of the area, and is central to the quality of life of residents and visitors, and is vital in ensuring that we retain jobs, and attract inward investment. The old quarter of Pontardawe should be protected from more out of town shopping developments that do not add to the betterment of old Pontardawe and its economic success, otherwise Herbert Street and High Street will wither away. There are no anchor shops in Pontardawe town any more. At one time, there were the Co-operative, Home and Colonial, Scales Stores, and many more regional shopping companies in the town. Neath still has a vibrant shopping centre. Pontardawe shopping has been killed off by the Tesco's, Lidl's and other large national brands. In the thirty years I have lived in Pontardawe, I have witnessed the decline of a once-thriving community. The centre of Pontardawe

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							needs a modern large store to help it survive. It does not need more out of town stores.
Dep1303	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	5.2.34	<p>Out of town shopping centre at Parc Ynysderw is still not properly linked to the old town. This is destroying Herbert Street, High Street, Holly Street and Swansea Road as a retail shopping area.</p> <p>Town Centre Development</p> <p>The Retail Topic Paper 24 sets out to promote town and village centres as the most appropriate locations for retailing. It seeks to enhance the vitality and attractiveness of town centres. The majority of commercial buildings in Pontardawe and the surrounding communities are a mix of late Victorian and Edwardian buildings with a number of early 20th century structures. A number of more imposing structures such as the Pontardawe Arts Centre, Pontardawe Library, and the One Stop Shop are Edwardian buildings constructed to a higher standard of red brick with sandstone dressings. The buildings of Pontardawe are mostly masonry, constructed of local Pennant sandstone, with brick features to the doorways and windows, and sometimes cement rendering. Several of the retail premises have lost their character by the overuse of commercial signage, which does not appear to be controlled by any Council or government legislation. The use of steel shutters to protect windows of commercial properties is not a good advert for a welcoming place to visit. Better policing might reduce the incidence of vandalism to private properties, especially late at night.</p> <p>A Victorian shop at the Cross in Pontardawe was demolished recently to create more open space. I question the reason for its demolition. What the area needs is more shops to attract more customers, preferably with heritage facades, not cheap brick and plastic structures such as those in High Street that do little to attract shoppers or visitors. Buildings have to be attractive to entice visitors inside. Urban centres need to be competitive to be viable, but the small shops cannot compete with the supermarkets that sell products in bulk.</p>
Dep1304	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	5.2.34	<p>The Retail Topic Paper 24 promotes access to urban shopping centres by public transport, cycling and walking. Have any of the people involved in writing this document actually attempted to carry home a distance of a mile or more several heavy shopping bags? I have seen a number of elderly people doing just that from Pontardawe to Ynysmeudwy. They walk over one mile because the taxi fares are too expensive. Public transport is also expensive for people on low incomes.</p> <p>Car parking developments and charges are deterring visits to Pontardawe. There are now fewer parking spaces, and the cost is too high. Staff employed in Pontardawe retail outlets are having to pay a substantial part of their salary as car parking charges, or park outside town and walk into the town centre. Outlying streets are now filled with cars parked by people visiting Pontardawe retail outlets or entertainment venues or working in the town centre. The car parking charges in Ystradgynlais are much lower than for Pontardawe. The high charges will drive the last of the people working on Herbert Street and High Street out of business. I ask for the car parking charges to be dropped. They do not encourage people to visit Pontardawe.</p>
Dep632	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.2.41	<p>Paragraph 5.2.41 Retail Allocations - Harbourside</p> <p>We repeat our concerns with regard to flood risk and air quality in respect of this key regeneration area.</p>
Dep1309	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	5.2.51	<p>Pontardawe is ideally situated as a tourist/holiday visitor destination between Swansea and the Gower peninsular to the south, and Brecon to the north. It has superb mountain and river landscapes, an excellent natural environment, and sufficient heritage/historic locations to attract visitors. The recreation value of the area is vastly undervalued; it must be advertised and promoted to the general public.</p> <p>Wind turbines are not attractive and do nothing to support the tourism industry. I object to all plans to erect more wind turbines in NPTCBC.</p>
Dep638	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.2.66	<p>Paragraph 5.2.66</p> <p>To ensure consistency with correct terminology the policy and paragraph 5.2.66 should refer to the Wales Coast Path rather than the 'Wales Coastal Path'.</p>

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Dep639	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.2.67	Paragraph 5.2.67 We support the development of the Afan Forest Park and the development of mountain biking, cycleways and footpaths.
Dep524	Mr Mark Hipkin		348582	Comment	Environment and Resources	5.3	<p>I firmly believe that the development in the protection of our environment is the most important part of this LDP. It is also important that we follow our own guidelines and not write them down just to show we know what they are.</p> <p>The undeveloped coast is special in our county because it is undeveloped. Indeed, when you look at Swansea Bay as a whole it is the untouched stretch of coastline which gives it its identity. That untouched coastal strip is almost exclusively inside NPT. The biodiversity that occurs along our coast has the ability to produce an invaluable resource of wellbeing to those who use or visit it. The protection against irreversible losses to our undeveloped coast must be guarded against.</p> <p>Much of the most valuable environments that occur within our county are privately owned. In some cases the general public of NPT are not able to appreciate these sites because access is prohibited. The corporate responsibilities of our larger investors should be such that they allow access to these sites freely, where possible, and also encourage community engagement by promoting the rich environmental resources that occur locally.</p> <p>Protection of our habitats is often guided by regulations and legislation. However, there are certain instances where sites may not qualify for extra protection because they don't quite make the British standard. The danger here is that certain sites, which are of significant value in Wales, are not given adequate protection. We should guard against this by recognising the significance that some locally important sites have to our county and Wales.</p> <p>A realistic picture of the future sees extra investment and development in our area. It is hoped that the protection of our biodiversity can work alongside these projects. With some extra planning a housing development might see a wetlands habitat being created nearby to provide a local recreation area. Or the storm water drainage system for the Baglan Energy park might feed a wetlands habitat suitable for breeding Lapwings. In many instances consulting with some of the local wildlife experts can help provide a vision for true sustainable development while being proactive in the protection of our valuable biodiversity.</p>
Dep794	Mr Sean McHugh		588966	Support	Environment and Resources	5.3	<p>Support the protection of important (priority) habitats and landscapes as noted in the plan .</p> <p>The recent State of Nature Report (2013) highlighted the steep declines of wildlife in the UK and Wales (60% moderate decline of many species and 31% steep decline of selected species). In NPT, the coastal strip and valleys are rich in wildlife and the habitats that wildlife utilise. Ecological principles strongly advocates maintaining integrity of core habitat areas and ensuring links to sites are maintained to allow species to move around the landscape in response to pressures from natural competition, non-native species, human disturbance and climate change. There are also opportunities to improve urban green spaces and road verges - a balanced approach can achieve multiple benefits for people and for wildlife.</p> <p>Support the commitment to increase awareness of the importance of our local wildlife; To educate people about the importance of particular habitats in order to conserve the flora and fauna they support as advocated in the Environment Topic Paper (August 2013) .</p> <p>The NPT Biodiversity Forum will be crucial in delivering this objective and are already making significant progress in identifying important areas for wildlife and habitats and engagement with communities and residents through outreach work. The forum also works internally in a key advisory role in relation to the NERC Biodiversity Duty (2006) applicable to all local authority and public bodies. Continued support for the biodiversity forum is welcomed.</p> <p>Note: the 2010 biodiversity targets mentioned in the Environment Topic Paper have been superseded and are now contained in the 'UN Strategic Plan for Biodiversity 2011-2020' and the EU Biodiversity Strategy 'Our Life, Our Natural capital- an EU Biodiversity Strategy until 2020' which the UK and Wales are committed to delivering. A key delivery partner will be local authorities and public bodies working in partnership with government, statutory bodies, environmental charities and local residents.</p>

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Dep672	Mr David Watkins	Natural Resources Wales	786443	Object	Environment and Resources	5.3	<p>Environment and Resources - General Comment</p> <p>There appear to be no proper consideration of water resources/quality and the Water Framework Directive. Both of these are important considerations in the development of the Plan. We assume that these issues form an integral part of an environmental policy but unfortunately we cannot identify that policy. This is an issue which has been highlighted in past correspondence and we are disappointed that the issue has not been addressed which makes the Plan unsound as it fails to comply with current European Union and Welsh Government planning and environmental policy.</p>
Dep772	Mr Chris Daniels	Walter Energy	787643	Object	Environment and Resources	5.3	<p>Given that the County Borough has substantial deep and shallow coal reserves and proposals for both underground coal working (with related surface developments, including mine waste disposal and colliery infrastructure) as well as surface coal mining are likely to come forward across the plan period we consider that the LDP needs a policy and related text concerning underground coal operations to provide the necessary framework and context for decisions on this form of coal mining and to balance with the policy and text for surface coal operations.</p> <p>We consider this additional policy and text is needed to make the LDP sound as it ensures consistency, having regard to the safeguarding policies for coal as well as the approach to surface coal operations, and is logical given the potential strategic importance of sustaining supplies of high quality coals from underground sources in the County Borough. In our view the Deposit LDP is not sufficiently sound in its current form as the approach to coal is not consistent and does not have sufficient regard to policies in MTAN 2: Coal, including the policies for development control as well as the specific references to underground coal working (see paragraph 226).</p> <p>Additionally, EIA Scoping has been carried out on major proposals for underground coal working and related surface development at Aberpergwm Mine. These proposals are of a strategic scale, have considerable potential importance for the County Borough (and South Wales) and have a potential positive bearing on levels of coal supply from the County Borough across the whole of the plan period. To provide some levels of certainty to both the mine operator as well as local communities we consider there is strong justification for the LDP to acknowledge these potential developments, which involve the extraction of coal that is currently safeguarded by the LDP (see Policy M1 and the Proposals Map) and a Mine that is shown as an operational coal site on the Proposals Map (with associated Buffer Zone around the mine site), and to provide a policy framework for considering these proposals as they are brought forward during the plan period.</p> <p>Therefore, we recommend a new policy M3 and supporting text as follows:</p> <p>Policy M3</p> <p><i>Underground Coal Operations and Related Surface Development and Operations</i></p> <p><i>Proposals for underground coal mining and related surface development and operations will be permitted providing:</i></p> <ol style="list-style-type: none"> <i>1. The proposal is environmentally acceptable or can be made so by planning conditions or obligations; or, if this cannot be achieved.</i> <i>2. The proposal delivers local community benefits or wider socio-economic and employment benefits which are sufficient to outweigh the disbenefits of the potential environmental impacts and therefore justify the granting of planning permission.</i> <p>Supporting text:</p> <p><i>Paragraph 5.3.66 of the LDP confirms that virtually the whole of the County Borough is underlain by coal. This includes reserves of high quality coals which have the potential to supply specialist users.</i></p> <p><i>The County Borough contains a number of operational underground coal mining operations which contribute to the continuing supply of coal from the area. There are also a number of non-operational mine sites that have the potential to access or enable access to important coal resources.</i></p>

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							<p><i>Aberpergwm Mine at Glynneath supplies high quality anthracite coal, which includes specialist metallurgical coal for use in pulverised coal injection at the TATA Steel Works in Port Talbot. The mine also supplies coal for use at Aberthaw Power Station along with high quality domestic coal products which are distributed nationwide. The County Borough Council has received an EIA Scoping Request and has issued an EIA Scoping Opinion on major proposals to extend the life of Aberpergwm Mine across and beyond the LDP plan period. The proposals include an extensive area of underground coal working, lying mainly to the west of the mine surface development, a new mine waste repository as well as mine surface development. In addition the EIA Scoping has considered potential transport infrastructure, including potential conveyor routes and rail loading facilities, with the potential to enable increased production from the mine. These potential developments are of a scale and nature that requires them to be the subject of Environmental Impact Assessment (EIA) and a full Environmental Statement (ES) with a Non-Technical summary (NTS) would need to accompany any major applications.</i></p> <p><i>In considering whether proposals for underground coal working and related surface development/operations are environmentally acceptable (as per Policy M3) specific regard will be had to:</i></p> <ul style="list-style-type: none"> <i>Ensuring the likely levels of subsidence are acceptable, having regard to potential impact on existing surface features and development;</i> <i>Ensuring satisfactory arrangements for disposal of colliery waste, including the reclamation/restoration of any disposal sites;</i> <i>Ensuring the methods of transporting coal and colliery waste are environmentally acceptable; and</i> <i>Ensuring the siting and design of any surface development or the carrying out of surface operations are environmentally acceptable.</i>
Dep304	Mrs Elaine Jones		784164	Object	Paragraph	5.3.2	Not just undeveloped sites that may be of biodiversity/environmental value but also those that are currently developed or partly developed.
Dep514	Dr Charles Hipkin		785966	Object	Paragraph	5.3.6	There are other areas of undeveloped coast that should be included here. They are (i) Little Warren (near Afan river mouth at east end of Aberafan Beach (ii) Margam Sands (between Tata Steelworks and Kenfig River).
Dep510	Dr Charles Hipkin		785966	Support	Paragraph	5.3.6	<p>Statements relating to the protection of undeveloped coast in NPT are welcome. Coastal ecosystems in NPT, including sand dune systems and salt marsh, are some of the most important, natural biodiversity resources in the county. There is a strong consensus of opinion that areas such as Baglan Bay have never been afforded the protection they deserve. A commitment from NPT to protect such an exemplary, biodiverse site, which has become more vulnerable in recent years, is essential.</p> <p>Little Warren and Margam Sands should also be included under the heading of protected undeveloped coast for similar reasons.</p>
Dep647	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.6	We welcome the statements set out in paragraphs 5.3.6 and 5.3.7. However, as indicated in our response to the Pre-Deposit Plan, we encourage the authority to revisit the "Management Framework for the Crymlyn and Neath Estuary Areas of West Glamorgan" in considering the potential benefit of preparing a SPG for the undeveloped coast to support natural heritage interests, and improve recreational opportunities within the area.
Dep517	Dr Charles Hipkin		785966	Object	Paragraph	5.3.28	<p>Neath Port Talbot has relatively few designated areas for conservation and biodiversity protection, particularly when compared to all other neighbouring counties. This is an embarrassing situation which does not show the county in a good light. As a consequence of this, the county's biodiversity resource is shrinking year by year. NPT's share of SACs (Natura 2000 and Ramsar sites) is pitifully small; all 3 sites mentioned in the document lie mostly within neighbour counties. For example, NPT's share in Kenfig SAC is insignificant. Many of the counties SSSIs are in a poor state and some have been impacted by local development, e.g. Crymlyn Burrows.</p> <p>Consequently there is an urgent need for adequately protected Wildlife Sites, SINCs and Local Nature Reserves, all of which can be designated by the Local Authority with guidance from NPT Biodiversity Forum using criteria outlined in' <i>Wildlife Site Guidance</i></p>

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							Wales '. Areas particularly vulnerable to biodiversity erosion such as undeveloped coastal areas, certain open mosaic sites and unimproved grasslands, desperately require SINC status. There is an urgent need for NPT to include a serious commitment to SINC's in its LDP.
Dep512	Dr Charles Hipkin		785966	Object	Paragraph	5.3.28	Although there are 3 sites partly within NPT that have European designations for nature conservation (Natura 2000 and Ramsar), it is really a very small part for each. Indeed the fraction of Kenfig SAC in NPT is so small that it is insignificant. Unfortunately, and unlike all the other counties that surround it, NPT has very few areas designated for nature conservation under any category. The fraction of NPT area designated for nature conservation, unfortunately, is embarrassingly small and something of a blot on the county. This can be addressed easily through the designation, by the county itself, of SINC's, Wildlife Sites and Local Nature Reserves, under guidance from the NPT Biodiversity Forum.
Dep661	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.29	Paragraph 5.3.29 We welcome the clarification that proposals which are likely to have a significant effect on European designation will be subject to a 'Habitats Regulations Appraisal', and the clarification that there is a presumption against development which may cause damage to a SSSI. Whilst we note the reference to <i>Planning Policy Wales</i> in the final sentence in paragraph 5.3.29, we recommend that a specific reference is also made to <i>Technical Advice Note 5: Nature Conservation and Planning</i> (2009).
Dep653	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.30	Additionally we are pleased to note in 5.3.30 that habitats and species should be conserved and enhanced, although we would welcome the inclusion of 'protected' in this statement. We are also pleased to note that biodiversity will be given full consideration in all planning decisions.
Dep663	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.34	Paragraph 5.3.34 Where mitigation is not possible, enhancement and compensation measures should be required, not just 'normally', to offset harm as much as possible. If mitigation or compensation is not possible, then development should be considered unacceptable.
Dep667	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.43	Paragraph 5.3.43 & 5.3.44 The Welsh Ministers have ongoing concerns of the potential risk that concentrations of Particulate Matter - PM ₁₀ - within Port Talbot may exceed the relevant daily mean limit value set in Directive 2008/50/EC on ambient air quality and cleaner air for Europe and transposed in the Air Quality Standards (Wales) Regulations 2010. Both the standard and the limit value state that the daily mean concentration of 50 µg/m ³ is not to be exceeded more than 35 times in a calendar year and we are conscious that any future proposed development within Port Talbot area may jeopardise this exceedance maximum figure. The question of air quality in the Port Talbot/Margam area linked to the Port Talbot Air Quality Management Area is very important and we have previously advised your Authority on this issue in our correspondence dated 13 February 2013 and 25 June 2013. We have also recently commented upon the proposed Neath Port Talbot Draft Airwise Strategy (20 August 2013 - sent to the NPT Environmental Manager) prepared by your authority and clearly the implications of any proposed development upon the integrity of the Air Quality Management Area are paramount. We highlight this issue as it could impact on the environmental acceptability of the proposed Harbourside development (in addition to the flood risk issues).
Dep668	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.3.45	Paragraph 5.3.45 We are pleased to note that construction has been identified as a potential contributor to air quality issues in central Port Talbot and must be addressed in a robust and sound manner.
Dep718	Mr Mark Harrison	The Coal Authority	787361	Object	Paragraph	5.3.49	The Coal Authority fully supports the inclusion of land stability as a key planning consideration as part of Policy EN8. Paragraph 5.3.49 highlights the requirement for developers to undertake specialist investigation or assessment where their site is thought to be affected by unstable land. This addresses the objection that we raised at the Pre-Deposit LDP consultation stage in October 2011 to the lack of such local policy coverage on unstable land. Given the significant legacy of past coal mining activity across Neath Port Talbot, which can give rise to instances of unstable land, The Coal Authority considers it vital that a locally distinctive policy is included in the LDP to support the risk-based approach to ensuring coal mining legacy is afforded due consideration as part of planning applications, which your Development Management team has been operating, based upon Coal Authority GIS

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							<p>mining data, since 2009. As past coal mining activities are a significant potential source of unstable land, it is recommended that this is acknowledged within paragraph 5.3.49 in order to provide local context to Policy EN8. The Coal Authority would therefore suggest the following additional contextual text, or similar, be added to paragraph 5.3.49:</p> <p><i>"The County Borough has been subject to significant levels of past coal mining activity, which has left a legacy. In cases where there is evidence that a site may be unstable..."</i></p>
Dep669	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.50	<p>Paragraph 5.3.50</p> <p>We would like to see the wording in this section strengthened by promoting the use of Sustainable Urban Drainage Schemes (SUDS) within new developments. SUDS not only manage surface water run-off and reduce flood risk, but promote groundwater recharge, absorb diffuse pollutants and improve water quality.</p>
Dep472	Mr Jon Timothy	Carmarthenshire County Council	201980	Object	Paragraph	5.3.62	<p>Paragraph 5.3.62 - this states that the 'surplus' of mineral reserves in NPT and Carmarthenshire will be relied upon to meet the shortfall in Swansea's reserves. Whilst it is acknowledged that discussions have been underway between the three authorities regarding this issue, at this stage agreement only exists at officer level as the matter has not been progressed politically within Carmarthenshire. Carmarthenshire has the following wording in its Plan that has just been submitted to the Welsh Government. In the interests of consistency, at this stage, we would suggest a similar approach be undertaken by our neighbouring authorities):</p> <p><i>6.11.9 Ongoing discussions are taking place with the City & County of Swansea and Neath Port Talbot County Borough Council regarding apportionment and sharing reserves. A TOTAL of 94.26 million tonnes of hard rock reserve is held jointly between Carmarthenshire and its two neighbours.</i></p> <p><i>6.11.10 The South Wales Regional Technical Statement (RTS) states that:</i></p> <p><i>NPT requires 7.9 to 8.4 million tonnes over 15 years</i> <i>Swansea requires 13.1 to 13.9 million tonnes over 15 years</i> <i>Carmarthenshire requires 10.5 million tonnes over 15 years</i></p> <p><i>6.11.11 Therefore assuming the worst case scenario, this gives a total requirement of 32.8 million tonnes which is well within the range of the available reserves in the 3 LPA areas. The evolving cross border arrangement will be monitored closely and when finalised will be reflected in the Plan accordingly.</i></p>
Dep675	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.3.85	<p>Paragraph 5.3.85</p> <p>We support the provision of appropriate after-uses and the advocating of a potential forestry use is one where liaison with Natural Resources Wales is strongly advocated.</p>
Dep313	Mrs Elaine Jones		784164	Object	Paragraph	5.3.94	<p>On shore wind farms should also be evaluated for their cumulative as well as individual impact on an area . This is important in the Afan Valley and Neath Valley areas.</p>
Dep769		Pennant Walters Ltd	787646	Object	Paragraph	5.3.94	<p>Paragraph 5.3.94 of the deposit Written Statement gives the misleading impression that the refined SSA boundaries shown on the deposit LDP Proposals Map derive from the December 2006 TAN 8 Annex D study undertaken by Arup on behalf of a consortium of five local authorities in South Wales, including NPT. That is not the case. The Annex D study (Figure 11b) recommended in relation to SSA E that the refined area should be based on Zones 1, 2, 3, 4, 13, 14 and 16. Although substantially smaller than the TAN 8 SSA E, it is a much larger area than the refined boundary that NPT now proposes.</p> <p>Although it is not made clear in the deposit Written Statement, paragraph 6.0.5 of NPT's Renewable & Low Carbon Energy Topic Paper refers to additional work commissioned from Arup, but this time by NPT alone. This comprised the preparation of wireframes from a very limited number of viewpoints. Paragraph 6.0.5 states: <i>"As a result the Authority resolved to amend the refined SSA boundary suggested by the Arup Study."</i> In fact the Arup Wireframe Analysis (February 2007) made no recommendations at all.</p>

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							Although not stated in either the deposit Written Statement or the Topic Paper, the very small refined SSA E actually originated in the Council's Interim Planning Guidance on Wind Turbine Development (undated), produced after the Neath Port Talbot UDP. Paragraph 6.1 of that document states that the Authority resolved to adopt the refined boundary following consideration of the Arup Annex D study, the additional wireframes and assessment of a planning application for a large windfarm between Seven Sisters and Glynneath (presumably the application for the now operational Maesgwyn wind farm). The objector (Pennant Walters Limited) proposes to extend this wind farm; the Council issued an EIA scoping opinion in May 2013 and a planning application is currently being worked up for submission in Spring 2014.
Dep814	Mr Richard Buckland	Infinis	786727	Object	Paragraph	5.3.95	<p>Policy RE1</p> <p>The policy wording is generally supported as being consistent with national planning policy in setting-out the detailed planning criteria for the assessment of renewable and low carbon energy developments. However there are some instances where further clarification would be beneficial.</p> <p>Para. 5.3.95 states that, 'the refined SSA boundaries represent the maximum potential for the development of large scale wind farms within the County Borough without creating unacceptable impacts on communities and the landscape'.</p> <p>Key to an understanding of the supporting text is the use of the word 'potential'. Our reading of this is that this relates to the potential of the refined SSA boundaries both in terms of their spatial extent and the capacity to accommodate developments with acceptable environmental impacts. It would be helpful therefore to provide clarification on this point. To be clear, we do not consider that the word "potential" in this context should relate to an overall cap on installed capacity. We would also emphasise that TAN 8 intended that the SSA boundaries should be "fuzzy" and that the fringes of the SSAs could equally well accommodate acceptable development.</p>
Dep770		Pennant Walters Ltd	787646	Object	Paragraph	5.3.95	<p>Paragraph 5.3.95 of the deposit Written Statement asserts that the refined SSA boundaries represent "...the maximum potential for the development of large scale wind farms within the County Borough without creating unacceptable impacts on communities and the landscape..." Given that the local planning authority cannot have carried out the kind of detailed environmental impact assessment that would accompany a planning application for a wind farm, a statement such as that cannot be based on a full and proper consideration of the planning merits. Given the terms of Policy RE1, the statement is prejudicial to the outcome of any future planning application.</p>
Dep816	Mr Richard Buckland	Infinis	786727	Object	Paragraph	5.3.96	<p>Policy RE1</p> <p>The policy wording is generally supported as being consistent with national planning policy in setting-out the detailed planning criteria for the assessment of renewable and low carbon energy developments. However there are some instances where further clarification would be beneficial.</p> <p>Para. 5.3.96 states that the Authority will seek to maximise acceptable installed capacity in the SSA, including medium scale wind farms. We welcome this position. Para. 5.3.96 states that schemes which may constrain the generating capacity of the SSA will be resisted. We would request that further detail be provided to ensure clarity on what constitutes a constraint of the SSA generating capacity.</p>
Dep811	Mr Mark Newey	Welsh Government	211935	Object	Paragraph	5.3.97	<p>Community based wind farms</p> <p>Paragraph 5.3.97 appears to be akin to a policy in its wording. Development proposals should only be judged against policies in the LDP, not text. If it is the Council's intention to use this as a decision making tool it needs to be written in the form of a policy. If this is the case consideration needs to be given as to why evidence is required on community ownership and benefits to the wider community? Welsh Government policy is to support community driven renewable energy projects (between 50KW and 5MW) but it is important such schemes are acceptable in planning terms. A policy should reflect this stance.</p>
Dep678	Mr	Natural Resources	786443	Object	Paragraph	5.3.97	Paragraph 5.3.97

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	David Watkins	Wales					<p>We welcome the inclusion of a statement on cumulative effect in the Plan. However, we have concerns that the third sentence of this paragraph states that cumulative effect will only be considered in combination with other 'larger scale' developments. However, no clarity is provided as what is understood as 'larger scale development'. The 2002 edition of the <i>Guidelines for Landscape and Visual Impact Assessment</i> states defined cumulative landscape and visual effects as those that:</p> <p><i>"result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments (associated with or separate to it), or actions that occurred in the past, present or are likely to occur in the foreseeable future."</i></p> <p>We therefore recommend that the third sentence of paragraph 5.3.97 is amended by deleting 'larger scale'. If it is decided to retain the text as currently drafted, we suggest that a definition of 'larger scale' development is included in the Plan.</p>
Dep817	Mr Richard Buckland	Infinis	786727	Object	Paragraph	5.3.97	<p>Policy RE1</p> <p>The policy wording is generally supported as being consistent with national planning policy in setting-out the detailed planning criteria for the assessment of renewable and low carbon energy developments. However there are some instances where further clarification would be beneficial.</p> <p>Para 5.3.97 states that a case by case approach will be taken to development outside of SSAs. This approach is welcomed however we would encourage reference to medium scale wind farms in this paragraph. It is our view that carefully sited medium scale wind farms could be accommodated outside SSAs within acceptable environmental impacts. The case by case approach should ensure that any applications with unacceptable impacts are not brought forward and early consultation between developer and Authority should be encouraged.</p>
Dep679	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.98	<p>Paragraph 5.3.98</p> <p>It should be made clearer that regard needs to be given to the potential for pollution of 'controlled waters' and potential flood risk, especially in the case of hydropower proposals.</p>
Dep680	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.3.105	<p>Paragraph 5.3.105</p> <p>We welcome the opportunity to be consulted in the development of the SPG for Renewable and Low Carbon Energy.</p>
Dep682	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.3.109	<p>Paragraph 5.3.109 & 5.3.110</p> <p>The proposed use of land use Class B2 "general industrial" sites for "<i>the new generation of in-building waste treatment facilities at employment sites - Baglan Bay & M38 junction - Policies EC1 & EC 2 - " provides clear criteria against all future proposals will be assessed".</i> We assume this criteria is cross referenced to Policy W1 and we note the policy criteria (d) states "<i>where possible avoid, damage or disturbance"</i>. We would strongly suggest removal of the phrase "where possible" is paramount for these criteria to be sound.</p>
Dep914	Miss Bethan Jenkins AM		473974	Object	Transport and Access	5.4	<p>Closure of Junctions 40 and 41</p> <p>If you are looking to support current and existing businesses in the Port Talbot area - developing the town of Port Talbot as a hub for commercial, residential, social and employment activities through an integrated physical regeneration of the town centre and the attraction of new investment -how does this tie in with the proposals to close junction 40 and 41 off the M4, which effectively cuts off Port Talbot town centre and has a detrimental effect on commuters from the Afan Valley's attempting to access Swansea, Cardiff or Bridgend?</p>
Dep826		Network Rail	705055	Object	Transport and Access	5.4	<p>Level Crossings</p> <p>Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning</p>

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							<p>policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision.</p> <p>As a result of increased patronage, Network Rail could be forced to reduce train line speed in direct correlation to the increase in vehicular and pedestrian traffic using a crossing. This would have severe consequences for the timetabling of trains and would also effectively frustrate any future train service improvements. This would be in direct conflict with strategic and government aims of improving rail services.</p> <p>In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing.</p> <p>As such, we strongly believe that the importance of Level Crossing safety warrants a specific Policy included in the Supplementary Planning Guidance Document which will help to elevate the importance of Level Crossings within the development management and planning process. We request that a policy is provided confirming that:</p> <ul style="list-style-type: none"> • The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway: Schedule 4 (d)(ii) of the Town & Country Planning (Development Management Procedure) (Wales) order, 2012 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both The Welsh Ministers and Network Rail for separate approval". • As a first principle, Network Rail would seek to close Level Crossings where possible. • Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact; and • The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.
Dep263	Mr Geoff Moore		782752	Object	Paragraph	5.4.2	I would like to see more detail as to how a reduction of reliance on the private car can be applied to the residents of the Amman Valley when there is no public bus service to enable prospective employees to and from work if employed in Pontardawe or the wider area of the Swansea Valley. No service (for at least a year and a half), no footpath on a major dangerous road, a deadly road with heavy traffic and large HGVs transporting coal from East Pit and rubbish to the tip (so I would not advise anybody to cycle along it.) Residents are 'forced' to use cars because the lack of an alternative.
Dep688	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.4.9	<p>Paragraph 5.4.9</p> <p>We welcome the introduction of the electrification of the main London to Swansea rail line which will improve the social, economic and environment of the South Wales area.</p>
Dep755	Mr Malcolm Lawer	Lafarge Tarmac	767883	Object	Paragraph	5.4.31	The final sentence of the supporting paragraph 5.4.31 should be expanded to read.....transported by means other than road, reducing congestion and emissions. <u>"It is however recognised that the safeguarding of existing wharves does not seek to preclude development which does not utilise the wharf facility, provided that the development does not preclude or prejudice future potential for wharf use"</u> .
Dep1257	Dr Gareth Hughes	Neath and Tennant Canals Trust	211886	Object	Culture and Heritage	5.5	The Trust regrets that Policy BE 3 does not promote the strategic regeneration of the canals but in relation to Implementation and Monitoring merely seeks to 'safeguard the canal network from inappropriate development'. If the canals are to realise their potential, the Trust is strongly of the opinion that the LDP should include a Strategic Policy to actively and urgently promote canal-based facilities and canal-side developments.
Dep1306	Mr Clive	Swansea Valley Heritage	706760	Comment	Paragraph	5.5.1	Of the Victorian town buildings, St. Peter's Church is an outstanding example of Gothic church architecture, completed in 1860. It stands out as a beacon in the centre of Pontardawe and more should be done to promote its heritage. The Church authorities are

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	Reed						<p>at last getting to grips with a backlog of repairs and ensuring the church is structurally sound. Such buildings support the heritage value of townscapes. An attractive environment draws people to that place to shop and to relax in.</p> <p>The LDP Plan says that NPTCBC has 93 Ancient Monuments, 399 listed buildings, and has a rich cultural identity. NPTCBC does not have a good record in the Pontardawe area for protecting those structures.</p> <p>Pontardawe tinsplate works building were demolished even though they were listed by Cadw. The building could and should have been retained , and used as storage by the commercial premises nearby. I see that happening in other urban centres that have historic buildings.</p> <p>Ystalyfera ironworks buildings, an industry that gave rise to the town of Ystalyfera. There was an opportunity to do something with the uncovered archaeological remains instead of allowing another supermarket to build over the site (Asda). A part of the supermarket building could have been relocated by moving it slightly to the south, and the uncovered boiler house, blowing engine house and blast furnaces retained for the tourism potential they offered.</p> <p>St Peter's Schoolroom in Pontardawe. This has been an ongoing problem of the Church authorities failing to renovate this architecturally important building. I have been in correspondence with the local authorities for over seven years in attempting to have this building made rain and weather proof.</p> <p>Pantyffynon canal dry dock at Godre'r Graig. I first wrote to NPTCBC in 1998 to bring to the council's attention the deterioration of this important heritage structure. It is the only surviving canal boat-building yard in south Wales. The adjacent horse stables have been using the boat dry dock as a tipping ground for their waste. I wish to see the tipping stopped, and all the rubbish removed from inside the structure.</p> <p>Crimea Colliery Godre'r Graig . This site close to Pantyffynon boat yard was built in 1856, and comprises a beam-engine house, ancillary buildings, chimneystack, tramroad and canal loading dock, and shaft wing walls. This is the only beam-engine house in NPTCBC. The canal dock has suffered from stone robbing in the near past due to its location near Craig Newydd housing development. I would like to see some form of protection put in place to safeguard this historic structure.</p> <p>Cwm-du canal aqueduct at Ynysmeudwy. This Listed structure is owned by NPTCBC. No work has been put in place to repair the structure, especially the masonry parapet that has deteriorated, and which has been replaced by metal tubular railings. I would like to see NPTCBC carry out renovation work on the structure.</p>
Dep695	Mr David Watkins	Natural Resources Wales	786443	Object	Paragraph	5.5.12	<p>Paragraph 5.5.12</p> <p>We recommend that the last sentence be amended. SUDS should be promoted and implemented in all development proposals, as advocated by Welsh Government guidance Planning Policy Wales & Technical Advice Note 15 (Development & Flood Risk).</p>
Dep696	Mr David Watkins	Natural Resources Wales	786443	Support	Paragraph	5.5.17	<p>Paragraph 5.5.17</p> <p>We note that further advice will be provided in a SPG on design considerations and we would welcome the opportunity to be consulted on this document.</p>
Dep1298	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	5.5.22	<p>The Swansea Canal is an 18th century heritage feature flowing through the centre of Pontardawe. It features on most current publications appertaining to the Upper Swansea Valley.</p> <p>It is an important environment waterway and was recognised as such in the former Lliw Valley Borough Council Local Plan whereby the canal corridor to the north and south of Pontardawe was identified as a wildlife corridor. The LDP includes Habitats Regulations Appraisal 2013 that also includes Natura 2000 sites (European Sites) and Habitat Directives to protect wildlife. The Swansea Canal in Pontardawe was identified by a recognised local environmentalist as a habitat for water voles. They were first noticed in the Canal at Pontardawe in 2011 but have since been killed by the mink that unfortunately inhabit the canal and</p>

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							<p>surrounding watercourses. I wish to see regulations put in place to control mink in all watercourses around Pontardawe, and possibly all of NPTCBC.</p> <p>The Neath Canal is identified in the NPTCBC Plan as seeing increased visitors and has opportunities for growth. Why isn't the Swansea Canal supported in the same way? As one who has contributed 30 years to restoring the Swansea Canal and seven years as secretary of the Regional Waterways project which sought to create a Regional Waterway comprising Neath, Tennant, and Swansea Canals. I have to say that NPTCBC has given very little support to the Swansea Canal restoration Project. I wish to see more support for the Swansea Canal project from NPTCBC. The NPTCBC Plan (Introduction and Background) states that the canal network can also provide opportunities for tourism and recreation.</p>
Dep1290	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	Paragraph	5.5.22	The Trust believes that national guidance, including 'Planning Policy Wales 2012' (sections 11.1.8 and 11.1.13) and 'Waterways for Wales: The Way Forward' British Waterways 2004 (page 12), has not been given due consideration during the preparation of the LDV
Dep1291	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Comment	Paragraph	5.5.22	<p>The Neath and Swansea canals serve as a Sustainable Drainage System (SuDS) during excessive rainfall events.</p> <p>Historically, certain sections of the canals assisted in the distribution of excessive rainfall by means of the lock bywashes, outfalls to the river and, in extreme cases, flood water overtopping each lock gate in turn.</p> <p>The possible use of parts of the Neath and Swansea canals as a SuDS is presently restricted at key points by culverting/infilling/encroachment. This was demonstrated in Pontardawe town centre in October 1998 when an extreme weather event resulted in the collapse of the Swansea Canal embankment and the flooding of the town.</p>
Dep1286	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	Paragraph	5.5.24	<p>Para 5.5.24</p> <p>Delete "where appropriate"</p>
Dep1288	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	Paragraph	5.5.24	<p>There is need to define more clearly what "a realistic prospect of restoration" means.</p> <p>What structure exist to make this judgement, as a number of canal owners, statutory bodies and stakeholders would need to be involved?</p> <p>We recommend a review of the existing canal restoration studies/planning guidance and the adoption of a strategic vision for the inland waterways in the Neath Port Talbot and Swansea council areas.</p> <p>The various engineering feasibility studies and costings can be updated, but more work needs to be done on how to achieve economic sustainability for both the current and the proposed canal networks.</p>
Dep482	Mr Robert Hulme		786201	Object	Paragraph	5.5.25	<p>Given the moves within the Swansea and Neath Valleys towards sustainable heritage (e.g. Copperopolis Project in the Hafod and White Rock areas of Swansea) it is imperative that in order to develop the full potential of the canal network within the area of consultation the full route(s) be maintained as potentially accessible for navigation for future development. Failure to do this has caused many problems on a number of canal projects over the years and the tourism potential for restoring as much as possible of all canals in the Neath and Swansea Valleys is of great future importance. All opportunities to restore those sections currently drained or cut off by low bridges and the like should be taken, especially when such can bring the lower terminus of the canal nearer to the metropolis of either Swansea or Neath. Many unfortunate errors of planning have already been made within this area of South Wales (Swansea has long rued the loss of the Mumbles Railway which could now be bringing an additional 2m tourists annually to the City) and these can be avoided by careful consideration of future potential in this regard. That a section of canal is currently drained or apparently cut off from the main canal is no guarantee that in the near to mid future a viable project is not going to come to fruition. With forethought, a canal carefully preserved can become the making of a route through a community, as witnessed by both Stoke on Trent, Wolverhampton and others.</p>
Dep1289	Mr John Andrew	Swansea Community Boat	789755	Object	Paragraph	5.5.25	<p>5.5.25</p> <p>"stretches of canal where restoration currently appears to be less likely, but may be feasible in the future"</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
	Davies	Trust					<p>On what basis will these be identified, if there is no overarching strategic vision for developing 'The Canal Network' ?</p> <p>Also, this policy appears to give these canal sections greater protection than that indicated in Part 2 of Policy BE3. We suggest a revision of Part 2, as detailed above.</p>
Dep1311	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Paragraph	5.5.26	<p>3.1.12 Living Language . The LDP sets out to strengthen the position of the language in our communities. In the LDP, Pontardawe is not included any more in those areas considered to be Welsh speaking communities. There has been a decline in the numbers of people speaking Welsh in Pontardawe, which was once considered to be a Welsh-speaking community. Thirty years ago, one could hear Welsh spoken in shops, banks, libraries, cafes, on the streets etc.</p> <p>The Government policies of making nearly everything bi-lingual (something that I support), have had little effect in stopping the decline in those speaking Welsh. One very rarely hears local people speaking it in public. The mass media of TV, newspapers, radio, music, all have a big impact on the Welsh language. I would like to hear more local authority employees speak Welsh in work, even if those around them do not understand what they are saying. Welsh has to become part of the culture of the communities. It is not ignorant to speak Welsh in front of other people, it might encourage other people to learn the language, as one would if visiting France.</p> <p>The Welsh language is, I fear, also being swamped by inward migration into the area. Very few of those coming to live in Pontardawe and the surrounding areas bother to learn the language. The latest census figures show that about 24% of the population is English born. I am not anti-English, but the present situation cannot be allowed to continue as it is. A stance has to be made to protect this extremely important part of the Welsh heritage. Someone has to speak out for the cultural heritage of Wales, even if it offends some of those living in our communities. Tony Blair's multi-cultural society might work in England, which has a large population of over 55 million people, whereby another five million immigrants are no threat to the English language.</p> <p>My paternal great grandparents were from Somerset and knew no Welsh at all, but my father went on to learn Welsh because he worked in a Welsh speaking community in the Dulais Valley. My wife, who hails from Manchester, speaks Welsh. She learnt the language because she was teaching at Ysgol Gyfun Ystalyfera. A number of my close friends are English born but have learnt to speak Welsh, but there are many immigrants to Pontardawe who say to me "why bother to learn Welsh, no one speaks it any more".</p> <p>The Welsh Assembly Government set out proposals recently for local authorities to put measures in place for safeguarding the Welsh language when planning is being considered for new developments. I support the idea and wish it to be implemented in NPTCBC.</p>
Dep1254	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	Paragraph	5.5.29	<p>The County Borough Council is invited to consider how the following policies and statements will apply to Cwmllynfell and particularly Rhiwfawr (in the absence of a declared settlement limit). Wording in the plan that is obviously contradictory to the way Cwmllynfell and particularly Rhiwfawr have been dealt with in the Deposit LDP is underlined below to emphasise this fact:</p> <p>5.5.29 In addition, there are a number of other communities where a high proportion of the population speak Welsh and the language in these communities is also considered an intrinsic part of daily life. The strategy therefore seeks to protect the integrity of the Welsh language within the areas identified in the policy, where 25% or more of the population speak the language.</p> <p>County Borough Council's Welsh Language Supplementary Planning Guidance:</p> <p><u>In line with Welsh Assembly Government's policy requirements in respect of the Welsh language, it is the Authority's aim to encourage development likely to help sustain and enhance the position of the language and resist proposals likely to harm it.</u></p>
Dep698	Mr David Watkins	Natural Resources Wales	786443	Object	Implementation and Monitoring	6	<p>Implementation and Monitoring - General Comment</p> <p>There are a number of Strategic Policies that do not have core indicators which raises questions about how outcomes of a policy</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							are to be measured. We have highlighted earlier in our comments that Plan does not address water quality/resource issues. This is a consistent omission in objective and policies which in turn is omitted from the monitoring framework which we consider must be addressed.
Dep790	Mr Mark Newey	Welsh Government	211935	Object	Supplementary Planning Guidance	7	The indicative schedule of 14 SPG (chapter 7) to be produced by the authority lacks clarity in relation to when the key SPG such as affordable housing, planning obligations and site development briefs for strategic regeneration areas will be prepared. This requires redress.
Dep829	Lindsey Curtis	Sustrans Cymru	787673	Object	Strategic Diagram	Picture 2.1	This diagram should be amended to include the strategic walking and cycling routes in Neath Port Talbot, e.g. Wales Coastal Path and National Cycle Network route. Reasons The Active Travel Bill has reached Stage 4 and was agreed by the Assembly on 1st October 2013. The Bill requires local authorities to consider the need to promote active travel journeys. The Strategic Diagram fails to do this by only highlighting the strategic road and rail network. As a forward planning document it is imperative that the LDP acknowledges and embodies the requirements of the Active Travel Bill.
Dep776	Mr Steve Lloyd	Liberty Properties plc	196453	Object	Affordable Housing	Policy AH 1	To propose that affordable contributions are to be calculated on a percentage of GDV is a radical decision that should have been subject to a consultation period in its own right. Should the proposal be adopted then the viability of sites at the higher end of the market will be compromised and therefore the provision of a range and choice of housing will not be provided.
Dep754	Mr Mark Newey	Welsh Government	211935	Object	Affordable Housing	Policy AH 1	The Plan states that the housing viability study found that the valley areas did not support the provision of affordable housing and as such no contribution is sought, except Pontardawe. The policy should reflect the viability assessment and not seek provision where it is not viable. Where there are spatial implications these should be clearly articulated on the proposals map to ensure the policy can be applied .
Dep756	Mr Mark Newey	Welsh Government	211935	Object	Affordable Housing	Policy AH 1	Policy AH1 Affordable Housing states that provision will be made to deliver 2,500 affordable housing units. It is not clear why the authority is relying on contributions based on a percentage of Gross Development Value (GDV) when the authority has identified a clear target of units to be delivered. Table 4.7 in the authority's Affordable Housing Topic Paper (page 34) states the percentage of actual units to be provided in urban areas is 26.7% and 13.9% in valley areas. It is considered more appropriate for the authority to state the percentage of units being sought through Policy AH1 based on the number of units rather than GDV.
Dep758	Mr Mark Newey	Welsh Government	211935	Object	Affordable Housing	Policy AH 1	Neath Port Talbot is the first authority in Wales to calculate the affordable housing contributions based on a percentage of Gross Development Value (GDV). It is important to clarify that this method of calculating affordable housing contributions does take into account costs, fees and abnormal site costs?
Dep761	Mr Mark Newey	Welsh Government	211935	Object	Affordable Housing	Policy AH 1	Viability The Ministerial Statement 'Stimulating Home Building in Wales' (July 2013) makes clear that Part L of the Building Regulations will reduce greenhouse gas emissions by 8% from 2010 levels. This is lower than the 40% originally consulted upon. With regard to sprinklers, from April 2014, the regulations will apply to high risk properties such as care homes, new and converted student halls of residence, boarding houses and certain hostels and from January 2016 to all new and converted houses and flats. The Welsh Government considers that based upon the domestic fire safety requirements costs outlined in the Consultation Regulatory Impact Assessment, an average cost of £3,100 can be used for a domestic property for both the implementation of sprinklers and the increase in Part L. This is a reduction from the £7,300 per unit which formed the basis for the viability work and hearing discussions in previous examinations. The authority should clarify how these reduced costs impact on the viability work and the affordable housing policy in the LDP. When considering percentages of affordable housing sought based on viability, the viability should ensure that the majority of proposals can achieve the percentages, thereby not placing an undue and onerous burden on the development industry to demonstrate financial viability on each application.

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Dep616	Mr David Watkins	Natural Resources Wales	786443	Support	Affordable Housing	Policy AH 1	<p>Paragraph 5.1.26 Policy AH 1 Affordable Housing</p> <p>We support this policy.</p>
Dep847	Mr Richard Price	Home Builders Federation	196451	Object	Affordable Housing	Policy AH 1	<p>Supplementary paper for Policy AH1. This is a supplementary paper from the Home Builders Federation, which should be attached to our representation for Policy AH1.</p> <p>1. The requirement for an additional viability assessment of the 0% policy areas</p> <p>The final paragraph of the policy states the following:-</p> <p>Proposals for 10+ residential units in areas where there is a 0% Affordable Housing target will be required to produce a viability assessment. If viable, a 5% contribution will be required.</p> <p>We believe this is totally inappropriate. It is the Council's responsibility to ensure the LDP affordable housing percentages are viable and deliverable. However, it is recognised that in some instances, there will need to be flexibility to negotiate the percentage, should the costs become overly onerous which means the percentages stated might not be viable. In terms of the policy, it is unacceptable and contrary to national guidance for the Council to set an affordable housing target based on evidence and then to expect applicants to further demonstrate that those targets are sound and robust. Indeed, the AHVA states that the Authority has a duty to show that the chosen affordable housing targets are broadly deliverable and therefore, it is not acceptable to require further testing to demonstrate that the percentages in the plan ARE deliverable. The affordable housing viability assessment clearly demonstrates that no affordable housing is viable in these areas, and therefore it is unacceptable to ask an applicant to provide further evidence to substantiate what the Council's evidence already shows. If the Council wishes to achieve higher than 0% in these areas, they need to provide evidence to demonstrate that this is achievable. If this evidence is not forthcoming at this present time, we believe the Council should monitor the situation and reconsider the evidence when the policy is due for review.</p> <p>Further to the above, it is clear from the AHVA and from our evidence below, that there are many costs omitted from the assessment, which will inevitably result in the policy percentages requiring negotiation downwards at the planning application stage. In light of this, it is highly unlikely the any variation upwards from the targets shown can be considered credible.</p> <p>2. Benchmarking land values</p> <p>We have serious concerns with the way in which the Council has approached this issue. The AHVA states that to arrive at an appropriate benchmark "we must take into account the potential impact of providing affordable housing on land values." In this respect, the AHVA goes on to state "we have reduced the VOA land values by 20%, to reflect a reduction in landowner expectations as a consequence of the introduction of an affordable housing requirement on residential sites."</p> <p>In terms of this issue, we believe the Council's approach to identifying a benchmark land value, (current benchmarks minus 20%), could be considered a reasonable approach. Although, we believe a 20% reduction is still a considerable reduction on the benchmark land value, which in many cases, would result in a land owner refusing to sell. The Council describes at length the fact that the landowner holds the key to releasing land and that any onerous reductions from the residential land values will result in landowners not bring land to the market. However, we also understand the Council's aspirations to manage landowner expectations given the policy requirements of the LDP and as such, we believe the 20% reduction from benchmark land values should be the maximum reduction assumed, in order to ensure land has a chance of being brought to the market.</p> <p>In terms of the above, this is the approach that seems to be favoured by the Council for use as a comparison with the residual land values generated by the assessment. However, when reading further (particularly on page 8 of the assessment), it would seem that the Council also believes that the 20% reduction methodology includes a 'viability buffer' to ensure that exceptional costs can be accounted for and that land values do not fall below the EUV 20% - 30% EUV premium. In this respect, given that the Council accepts that there will be exceptional costs on nearly all the sites within the LDP, and any assumptions for these costs have been omitted from the assessment, it would seem that the actual 'benchmark' land value being considered is the 20% - 30% EUV</p>

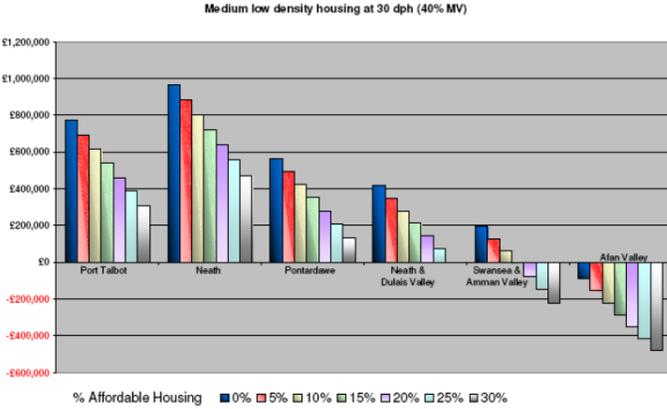
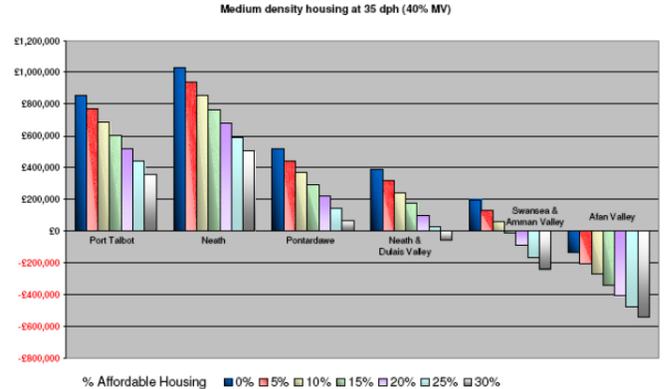
ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT																					
							<p>approach, rather than the 20% reduction from the true benchmark land value.</p> <p>This is perplexing to us. Not only do we believe the 20% - 30% EUV approach is not sound or robust in identifying land values, but the Council also seems to be of this opinion. In this respect, on page 5 of the AHVA the Council describes a 30% uplift on existing use as offering "no significant financial incentive for a landowner to bring a site forward for residential development." Indeed, on page 6 the council also states that there is no evidence to demonstrate that offering a 50% uplift would incentivise a land owner to sell. In light of this, we cannot understand how the Council can even consider the land values offered by the EUV approach (listed in the table on page 7), as a credible benchmark against which to consider the results of the assessment. Surely if the Council believes this methodology holds no water with respect to identifying benchmark land values, the results of the assessment should not be compared to any land values assumed as a result of it.</p> <p>In light of the above, we believe the benchmark land values offered in the table on page 7 (repeated below), should be the MINIMUM benchmark land values within the assessment. Reading the AHVA, this is the only methodology that can be considered sound from the Council's standpoint.</p> <table border="1" data-bbox="1344 709 2211 961"> <thead> <tr> <th data-bbox="1344 709 1685 772">Area</th> <th data-bbox="1685 709 1938 772">VOA Residential per ha</th> <th data-bbox="1938 709 2211 772">Residential Benchmark per ha</th> </tr> </thead> <tbody> <tr> <td data-bbox="1344 772 1685 804">Port Talbot</td> <td data-bbox="1685 772 1938 804">£640,000</td> <td data-bbox="1938 772 2211 804">£512,000</td> </tr> <tr> <td data-bbox="1344 804 1685 835">Neath</td> <td data-bbox="1685 804 1938 835">£840,000</td> <td data-bbox="1938 804 2211 835">£672,000</td> </tr> <tr> <td data-bbox="1344 835 1685 867">Pontardawe</td> <td data-bbox="1685 835 1938 867">£590,000</td> <td data-bbox="1938 835 2211 867">£472,000</td> </tr> <tr> <td data-bbox="1344 867 1685 898">Neath & Dulais Valley</td> <td data-bbox="1685 867 1938 898">£520,000</td> <td data-bbox="1938 867 2211 898">£416,000</td> </tr> <tr> <td data-bbox="1344 898 1685 930">Swansea & Amman Valley</td> <td data-bbox="1685 898 1938 930">£510,000</td> <td data-bbox="1938 898 2211 930">£408,000</td> </tr> <tr> <td data-bbox="1344 930 1685 961">Afan Valley</td> <td data-bbox="1685 930 1938 961">£515,000</td> <td data-bbox="1938 930 2211 961">£412,000</td> </tr> </tbody> </table> <p>Secondly, we believe the Council's explanation of the use of benchmark land values is rather contradictory. For instance, from page 4 of the AHVA onwards, the Council describes at length the importance of setting a robust benchmark land value to inform the assessment. They also describe this benchmark value as something required by a landowner to ensure they have a sufficient incentive to sell, in light of the policy requirements set out by the LDP. However, on page 8 the Council goes onto describe the benchmark land values within the assessment as "not net values, i.e. after deduction of all costs of required infrastructure." In this respect, we cannot understand how the Council can on the one hand state that the benchmark land value is the amount of money required to be paid to the landowner to incentivise them to sell, and then on the other hand state that the benchmark value is also assumed to somehow cover the additional costs of development which the Council has failed to identify. We believe this position is contradictory and untenable.</p> <p>Further to the above, the Council states (again on page 8) that whilst the use of benchmark values is appropriate for setting a policy target, in reality, when a developer negotiates on an individual site they will be expected to show evidence that they have taken known exceptional development costs into account when agreeing realistic land values. In this respect, given that the policy should be based on 'realistic land values', we believe the Council also has a duty to ensure all foreseeable costs are accounted for and should not simply ignore the existence of such costs in favour of their consideration being left to the vagaries of individual planning applications. The paragraph (on page 8) also goes onto state that only 'unforeseeable' costs will be accepted at the planning application stage. However, in this respect, the Council has already stated that they accept exceptional costs will be required on the majority of LDP sites and therefore, these costs should be considered foreseeable yet they are purposely omitted from the viability assessment. The Council makes the caveat that the reason for not including such costs is due to the fact that they have no evidence to demonstrate what these costs might be. However, this we believe is simply not appropriate. The fact that the Council cannot find evidence to inform the requirement of costs that will be required to develop sites, should not be a reason for the Council to simply ignore those costs! In this respect, we have provided substantial evidence within this submission to demonstrate what a sensible average cost for these works could be (more on this below and within the appendices), so it is clear that such evidence can be found if it is properly researched. Furthermore, notwithstanding this, in a way the Council has already made an assumption on the extent of these costs, by stating that an allowance for such costs has been reflected in the benchmark residual land values. However, the key difference between our suggested costs and the Council's 'assumed buffer', is that our</p>	Area	VOA Residential per ha	Residential Benchmark per ha	Port Talbot	£640,000	£512,000	Neath	£840,000	£672,000	Pontardawe	£590,000	£472,000	Neath & Dulais Valley	£520,000	£416,000	Swansea & Amman Valley	£510,000	£408,000	Afan Valley	£515,000	£412,000
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							<p>costs are identified and based on sound and robust evidence, whereas the Council's assumed (and un-quantified) buffer has no evidential basis whatsoever.</p> <p>In light of the above, we believe the only sensible land values for inclusion within the assessment are those based on existing residential land value benchmarks. As we have stated above, we believe the 20% reduction could be an overestimation of the flexibility inherent with a landowners requirements, however, for the purposes of this assessment we are willing to accept this approach, provided the values concerned are assumed to be a MINIMUM land value, payable to the landowner. For clarity the table of land values to which we refer is repeated below.</p> <table border="1"> <thead> <tr> <th data-bbox="1344 520 1685 583">Area</th> <th data-bbox="1685 520 1938 583">VOA Residential per ha</th> <th data-bbox="1938 520 2778 583">Residential Benchmark per ha</th> </tr> </thead> <tbody> <tr> <td data-bbox="1344 583 1685 615">Port Talbot</td> <td data-bbox="1685 583 1938 615">£640,000</td> <td data-bbox="1938 583 2778 615">£512,000</td> </tr> <tr> <td data-bbox="1344 615 1685 646">Neath</td> <td data-bbox="1685 615 1938 646">£840,000</td> <td data-bbox="1938 615 2778 646">£672,000</td> </tr> <tr> <td data-bbox="1344 646 1685 678">Pontardawe</td> <td data-bbox="1685 646 1938 678">£590,000</td> <td data-bbox="1938 646 2778 678">£472,000</td> </tr> <tr> <td data-bbox="1344 678 1685 709">Neath & Dulais Valley</td> <td data-bbox="1685 678 1938 709">£520,000</td> <td data-bbox="1938 678 2778 709">£416,000</td> </tr> <tr> <td data-bbox="1344 709 1685 741">Swansea & Amman Valley</td> <td data-bbox="1685 709 1938 741">£510,000</td> <td data-bbox="1938 709 2778 741">£408,000</td> </tr> <tr> <td data-bbox="1344 741 1685 772">Afan Valley</td> <td data-bbox="1685 741 1938 772">£515,000</td> <td data-bbox="1938 741 2778 772">£412,000</td> </tr> </tbody> </table> <p>3. Costs omitted from the assessment</p> <p>We believe the Affordable Housing Viability Assessment 2012 has underestimated the potential cost of developing land for housing in the authority. We believe there are a number of potential costs that have been omitted from the assessment, which need to be included in order to ensure the impact on development viability is properly considered. We describe these omitted costs in detail below.</p> <p>3.1 Dealing with the additional works required to develop housing sites</p> <p>Through our recent viability work with respect to the Community Infrastructure Levy, we have become increasingly concerned with the cost of additional works that are required to ensure housing developments can be delivered on the ground. Essentially, these are works that are required on all development sites, (regardless of whether or not they are greenfield or brownfield in nature), in order to prepare the site for development and to address any issues with remediation etc. Further to this, the inclusion of these costs in viability assessments is being recognised by local authorities and Inspectors through the CIL process and is considered an essential part of the viability testing exercise for the levy. In addition, it should be noted that these are not 'abnormal' costs in the sense that they are not normally experienced on development, they are costs that our members experience on nearly all development sites in all areas of Wales. Indeed, through the AHVA the Council concurs with this by accepting these costs will be required on the vast majority of their proposed development sites.</p> <p>Examples of the types of works experienced are:</p> <ul style="list-style-type: none"> • Ground contamination/consolidation/demolition. • If there is a need for the ground to be remediated/consolidated, this will necessitate a raft foundation, which is a significant additional cost, and very common on development sites in Wales. • If ground has been remediated, then a capping layer of inert safe material will need to be applied, which has to be imported in. • If gas pipes are present at the site, then gas membranes will be required at significant cost • Drainage and onsite attenuation - attenuation tanks are now required on all sites with a rough cost of £80k for one tank. One of our members reported that on a 250 unit greenfield site, they were required to install 9 tanks, which resulted in a cost of nearly 3k per home or £750,000 for the whole development. <p>Land profiling, particularly on hilly areas will attract extra costs for cut and fill to ensure the foundations can be accommodated. Again raft foundation will be required here.</p>	Area	VOA Residential per ha	Residential Benchmark per ha	Port Talbot	£640,000	£512,000	Neath	£840,000	£672,000	Pontardawe	£590,000	£472,000	Neath & Dulais Valley	£520,000	£416,000	Swansea & Amman Valley	£510,000	£408,000	Afan Valley	£515,000	£412,000
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							<p>The list above is just a short list of the additional works that our members stipulate are becoming the norm on nearly all sites they develop in Wales. Crucially also, with respect to the AHVA, these costs are not picked up by the BCIS, as they would be dealt with under a completely separate contract. As such, it is clear that the current build costs within the AHVA, will not allow any flexibility to account for these requirements.</p> <p>In light of the above, we are concerned by the fact that the AHVA analysis is based on a notional one hectare site that is 'oven ready' for development and makes no allowance for the additional costs and extra works mentioned above. Our concerned are heightened even further by the Council's admission that these costs will be required on their LDP sites, yet any allowance for such costs has been purposely omitted from the assessment. Therefore, if the AHVA is to provide a realistic appraisal of the potential cost of developing sites over the LDP period, these significant costs cannot be ignored. In this respect, we have made an assumption of the likely cost of these works below, in order to demonstrate the flexibility that will be required in the affordable housing viability assessment, in order to ensure the percentage targets are indeed viable and deliverable on the ground.</p> <p>3.2 The additional requirements of development - the costs?</p> <p>As we have stated above, we are concerned with the lack of consideration given to the additional works and extra costs that will be required on developments. As such, we believe it will be necessary to include sufficient flexibility in the AHVA to ensure these costs can be dealt with.</p> <p>In order to inform the likely cost of these works, we recently undertook a consultation exercise with our membership to try and ascertain the appropriate cost to assume. From this consultation exercise, we received a number of examples of the costs associated with these extra works, some of which were estimates, whilst others were actual costs taken from recently developed sites in Wales.</p> <p>In terms of figures, the costs ranged from £115k per acre (£285k per hectare) for more straightforward sites, to over £400k per acre (nearly £1m per hectare) for more difficult sites. On average however, from the list of sample sites that were provided and from the comments we received, the average cost of these additional works was considered to be approximately £220k per acre or £543,400 per hectare. A list of the sample sites and costs received as a result of our exercise is provided within Appendix 1 below.</p> <p>Further to the above, we also received reports from Intégral Géotechnique and Arup outlining a summary of the typical costs of remediating sites in Wales. We enclose a copy of both reports in Appendices 2 and 3 below. As you can see from these reports, the organisations are professional consultancies that specialise in site remediation and the redevelopment of housing sites. Both organisations have extensive experience and expertise in developing land in many areas of Wales for a variety of different clients and therefore, we have no doubt that the cost estimates provided within these reports are robust and accurate.</p> <p>In terms of figures, as you can see from the reports the typical costs provided for site remediation and addressing constraints ranged from between £175k per acre and £325k per acre, which on average works out at £250k per acre or £617,500 per hectare. However, it is evident from the advice given within the reports that due to topography and the general nature of development sites in Wales, the actual costs could be well in excess of the figures quoted. As such, we believe assuming a cost of £250k per acre (or £617,500 per hectare) for addressing the extra works and site remediation/constraints required on developments would be entirely reasonable.</p> <p>Further to the above, as part of our work on the Community Infrastructure Levy, we are beginning to gather specific market intelligence on the additional costs of developing sites in particular areas of Wales. In this respect, as part of our work on the RCT CIL, our members have provided us with five recently constructed housing sites, along with the 'additional costs' that were experienced on these sites. This information is set out below.</p> <p>The sites provided to us were as follows:-</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<ul style="list-style-type: none"> • Brownfield sites for 49 dwellings • Brownfield site for 72 dwellings • Brownfield site for 137 dwellings • Greenfield site for 88 dwellings • Greenfield site for 97 dwellings. <p>In terms of the sites above, none of the three brownfield sites suffered significant contamination but required (in part) demolition, some remediation, service diversions, on-site attenuation, pumping stations, raft foundations, asbestos removal, importation of clean capping layer and raising levels for flood mitigation. In this respect the level of extra costs were £193,000 per hectare, £326,040 per hectare and £333,450 per hectare respectively.</p> <p>Interestingly, the two Greenfield sites provided required much higher levels of extra works and costs, which amounted to £449,450 per hectare and £1,217,710 per hectare respectively.</p> <p>It should also be noted that the costs described above are in addition to the standard infrastructure and utilities works required (often referred to as 'external works') in general housing development.</p> <p>As you can see from the information above, the average cost of extra additional works on the brownfield sites amounted to £284,150 per hectare. However, for the greenfield sites the average cost was £833,580 per hectare. This, we believe, not only supports our suggestion for the assessment to include an allowance for the extra additional costs of development, but also demonstrates that such costs can be experienced despite the nature of the development site i.e. brownfield or greenfield.</p> <p>In addition to the above, the recent Torfaen LDP Examination has brought another key example to light, which serves as a very useful example of the existence of these costs and also the potential value of these costs and their consequent impact on development viability i.e. the South Sebastopol development. We have attached the South Sebastopol Viability Assessment within Appendix 4 below.</p> <p>In terms of the assessment, on page 8 you will see an additional £21,029,952 of 'abnormal' costs that are required to enable the site to be developed. When considered over 47 hectares (the site area) this equates to a cost of £450,000 per hectare. Indeed, we believe the South Sebastopol site is another key example to substantiate our position on this matter, as it is a greenfield site that does not require substantial remediation, contamination mitigation or demolition, yet it still required over £20m of work to prepare the site for development.</p> <p>In light of the above, we believe it is unreasonable and inappropriate for the viability assessment not to recognise that there will be extra works and additional costs required on all developments in NPT - particularly when the Council recognises this will be the case through the AHVA! Our members are clear that in the vast majority of cases, the existence of additional works is now very much the norm with respect to development in Wales. It is virtually unheard of that a site (both in terms of greenfield or brownfield) is able to be developed without the requirement for significant additional works and hence, significant additional costs. As such, given the affordable housing viability assessment is based on such a site, we do not believe it provides a sound basis with which to assess the potential viability of the affordable housing targets chosen.</p> <p>Given our evidence above, we believe the AHVA should include additional flexibility to ensure the requirement for these additional costs can be addressed, alongside any affordable housing requirements, when delivering development on the ground. In light of our evidence above, it is clear this cost varies widely depending on the site in question, however, as an average, including a cost of £617,500 per hectare could be considered appropriate. Therefore, in light of the evidence above, we believe the affordable housing viability assessment should allow a minimum viability buffer of £617,500k per hectare. Provided the affordable housing policy itself is sufficiently flexible, this should help to ensure the cost of these essential additional works is accounted for.</p> <p>3.3 SUDS Within the AHVA, we notice that the Council has omitted the cost of the requirement for Sustainable Urban Drainage Systems</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>from their assessment. It is a fact now that the requirement for SUDS will be prevalent on all developments and therefore, the viability assessment should recognise this. This position was also reflected in the Welsh Government's viability analysis of the changes proposed to Part L of building regulations (a copy of which can be obtained from the WG website).</p> <p>In terms of a cost for SUDS, we have used the Welsh Government's evidence to inform our assessment. They state that a SUDS system would cost on average £500 per plot. However, we believe it is worth noting that since then we have had numerous examples of the cost of providing such systems from our members, which demonstrates that this assumption is extremely conservative. In this respect, one of our members provided us with two recent examples:</p> <p>Site 1</p> <ul style="list-style-type: none"> • Private Domestic SUDS cost £1855 per plot • Highways SUDS cost the equivalent of £1263 per plot <p>Site 2</p> <ul style="list-style-type: none"> • Private Domestic SUDS cost £1966 per plot • Highways SUDS cost divided equally by the number of serving properties is the equivalent of £2144 per plot <p>The developer also stated that it is prudent to note that each of Highways SUDS cost also then have a further 'commuted Sum' figure attached to them for the authority to take ownership of them. Thus the real cost is around 60% mark up again on those provided above.</p> <p>As you can see, these costs are far in excess of the £500 per plot assumed by the Welsh Government. As such, when using this cost within the assessment, we must remember that in reality, the actual cost of providing such systems is likely to be substantially more.</p> <p>3.4 Fire Sprinklers - Potential Costs</p> <p>We understand the Council has included a cost for fire sprinklers within the assessment. This is welcomed. However, there is currently a debate taking place as to the extent of the cost of installing fire sprinkler systems. We recognise that the WG evidence suggests the cost will be roughly £3000 per dwelling, however, we are regularly receiving evidence to suggest this cost will be considerably more. Take for example the experience of First Choice Housing Association (provided within Appendix 5 below). The Association decided to install fire sprinklers in two new build bungalows, on the basis that they believed it might cost roughly £5k per dwelling. However, after costing the complete works to adhere to the British Standard, they quickly realised the cost would be substantially higher than this. As described in Appendix 5 below, the actual cost of the installation proved to be £37k for one property and £22k for the other property. This is clearly a substantially more than the £5k per plot the company originally assumed and also significantly more than the £3k per plot assumed in the AHVA. In light of this, we believe it is imperative that a sufficient viability buffer is included within the viability assessment to help deal with any unexpected costs that arise from newly introduced legislation such as this.</p> <p>4. Viability results</p> <p>In terms of the results of the assessment the graphs below (taken from the AHVA) describe the residual values achieved, which need to be compared against the benchmark land values identified by the assessment.</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT																					
							<p>Medium Low Density Housing (30 dph)</p>  <p>Medium Density Housing (35 dph)</p>  <p>Further to the above, below is the Council's table which identifies the appropriate benchmark land values.</p> <table border="1" data-bbox="1359 1350 2344 1602"> <thead> <tr> <th>Area</th> <th>VOA Residential per ha</th> <th>Residential Benchmark per ha</th> </tr> </thead> <tbody> <tr> <td>Port Talbot</td> <td>£640,000</td> <td>£512,000</td> </tr> <tr> <td>Neath</td> <td>£840,000</td> <td>£672,000</td> </tr> <tr> <td>Pontardawe</td> <td>£590,000</td> <td>£472,000</td> </tr> <tr> <td>Neath & Dulais Valley</td> <td>£520,000</td> <td>£416,000</td> </tr> <tr> <td>Swansea & Amman Valley</td> <td>£510,000</td> <td>£408,000</td> </tr> <tr> <td>Afan Valley</td> <td>£515,000</td> <td>£412,000</td> </tr> </tbody> </table> <p>As you can see from the above, when a comparison with the graph and the values within the table is made, including the costs we believe have been omitted from the assessment, the chosen affordable housing percentages within Policy AH1 cannot be supported. We also believe these graphs clearly substantiate our representations above with respect the requirement for an additional viability assessment in the '0% areas'. That is, this requirement is clearly inappropriate and is not based on robust and credible evidence.</p>	Area	VOA Residential per ha	Residential Benchmark per ha	Port Talbot	£640,000	£512,000	Neath	£840,000	£672,000	Pontardawe	£590,000	£472,000	Neath & Dulais Valley	£520,000	£416,000	Swansea & Amman Valley	£510,000	£408,000	Afan Valley	£515,000	£412,000
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ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>5. Scenario Testing</p> <p>We are aware that various scenarios could play out over the course of the LDP, however, there is absolutely no evidence to demonstrate which scenario (or a combination of scenarios) might happen. As such, we believe the assessment should be based on current market assumptions, with a robust monitoring framework included to consider any changes to the inputs and assumptions as and when required.</p> <p>6. Overall numerical affordable housing target</p> <p>Give that we believe the percentage targets within Policy AH1 have been overstated, we believe the numerical target has also been overstated.</p> <p>7. Policy flexibility</p> <p>The need for the policy to be flexible is not only a requirement of national guidance, but is also a requirement of Soundness Test CE4. However, the Council has also explained at length (through various background papers) that they are also of the opinion that it is essential to ensure the affordable housing policy is flexible and capable of being negotiated on a site by site basis. Indeed, given the way the affordable housing viability assessment has been undertaken, ensuring the policy is flexible and negotiable on a site by site basis is a fundamental element to its workability and implementation on the ground.</p> <p>In light of this, we believe the policy needs to be more robust in this area and should include, within the body of the policy itself, a clause to state categorically that any chosen affordable housing targets will be considered as targets, and that the policy will be open to negotiation on a site by site basis to provide users of the plan with the opportunity to demonstrate the level of affordable housing that is actually viable on each site.</p> <p>To clarify, given that this is such a fundamental aspect of the policy and its implementation, we believe this clause should be contained within the policy itself and not within the reasoned justification.</p> <p>8. Conclusions</p> <p>We do not believe the percentage targets within Policy AH1 have been properly considered. Our representations above set out where we believe the gaps and omissions within the assessment exist and in light of this, we believe the affordable housing percentages have been overestimated.</p> <p>As the Council concedes, affordable housing policies should be workable on the majority of sites within the plan. However, given the costs that have been omitted from the assessment (particularly the requirement for exceptional costs), we believe the affordable housing policy will inevitably require negotiation on every site where it is proposed. This not only makes for an unsound and unworkable policy, but would also result in a reduction in numerical affordable housing target the plan aims to deliver. Furthermore, it could also result in the delivery of housing being compromised altogether, if potential developers are ‘put off’ from starting negotiations on the basis that the policy is significantly unworkable. A clear example of where this has happened can be seen with Caerphilly Council, where their affordable housing policy has directly contributed to a complete lack of housing delivery in the Southern Connections Corridor, over the 3 years since its adoption. The Council are now reviewing the plan as a result.</p> <p>The policy should not be adopted as proposed. Our suggested changes are set out below.</p> <p>9. Tests of Soundness</p> <p>9.1 Soundness Test C2</p> <p>We believe the affordable housing policy does not accord with national guidance. As such, Policy AH1 contravenes Soundness</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>Test C2 and implementing the changes set out below would help to satisfy this soundness test.</p> <p>9.2 Soundness Test CE2</p> <p>We believe the affordable housing percentage targets set out within Policy AH1 are not based on robust and credible evidence and therefore contravene Soundness Test CE2. Implementing the changes set out below would help to satisfy this soundness test.</p> <p>9.3 Soundness Test CE4</p> <p>Policy AH1 does not provide sufficient flexibility in order to ensure the level of affordable housing required can be delivered. As such, the policy contravenes Soundness Test CE4 and implementing the changes set out below would help to satisfy this soundness test.</p> <p>10. Suggested changes</p> <p>10.1 We believe the affordable housing viability assessment should be re-run taking into account our comments above. The percentage targets within Policy AH1 should then be updated following this new assessment.</p> <p>10.2 The requirement for additional viability testing of the '0% areas' should be removed</p> <p>10.3 The numerical affordable housing target should be updated following the re-run of the viability assessment.</p> <p>10.4 A clause should be included within policy AH1, to state categorically that any chosen affordable housing targets will be considered as targets and that the policy will be open to negotiation on a site by site basis.</p>
Dep819	Mr Mark Newey	Welsh Government	211935	Object	Affordable Housing	Policy AH 1	Policy AH 1 'Affordable housing' refers to spatial areas which should be shown on the proposals map.
Dep838		Ryehill Properties (Wales) Ltd.	787653	Object	Affordable Housing	Policy AH 1	<p>The policy is considered to fail the following tests of soundness:</p> <ul style="list-style-type: none"> • C2 - it has regard to national policy; and • CE2 - It is reasonably flexible to enable it to deal with changing circumstances <p>Accordingly, Policy AH1 should be amended with the following sentence being added in:</p> <p><i>'The actual percentage of affordable housing on each site will be subject to Site specific negotiations taking on board the individual development economics and viability of the Site'.</i></p> <p>The proposed change is considered necessary to ensure that the policy is flexible enough to deal with changing market circumstances and individual site constraints which may impact on the site's viability and delivery.</p>
Dep617	Mr David Watkins	Natural Resources Wales	786443	Object	Affordable Housing Exception Sites	Policy AH 2	<p>Paragraph 5.1.35 Policy AH 2 Affordable Housing Exception Sites</p> <p>Whilst we support the reference to environmental considerations in criterion 4, we recommend that the policy should seek to negate adverse effects rather than 'reduce' adverse effects. We therefore recommend that Criterion 4 is amended by replacing "reduce" with "negate or avoid or appropriately mitigate". We consider such an amendment to be consistent with the objective to support and enhance the county's natural heritage and meets Test of Soundness CE1.</p>
Dep694	Mr David Watkins	Natural Resources Wales	786443	Object	Design	Policy BE 1	<p>Paragraph 5.5.7 Policy BE1 Design</p> <p>We welcome and support this Policy, especially with regard to retaining and enhancing green spaces, green infrastructure, biodiversity and ecological connectivity (5) and developing Brownfield land in preference to Greenfield land (8(c)). However with regard to point (9), we would like to see the use of the word Sustainable Urban Drainage schemes (SUDS) specifically used.</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
Dep842		Ryehill Properties (Wales) Ltd.	787653	Object	Design	Policy BE 1	<p>The policy is considered to fail the following tests of soundness:</p> <ul style="list-style-type: none"> • C2 - It has regard to national policy; and • CE2 - It is reasonably flexible to enable it to deal with changing circumstances <p>Whilst the aspiration of achieving high quality design is supported it should be balanced with the need to ensure that new development is viable to secure the actual delivery of development on the ground.</p> <p>Furthermore, whilst it is supported that new development should provide linkages to the surrounding community, it must be recognised that it is not always within the control of developers to provide such linkages due to land ownership issues.</p> <p>Accordingly the first paragraph should be amended to read: All development proposals will be expected to demonstrate high quality design which fully takes into account the natural, historic and built environmental context and contributes to the creation of attractive, sustainable places, <i>whilst also considering the viability of the development.</i></p> <p>Bullet point 7 should be amended to read: It plays a full role in achieving and enhancing an integrated transport and communications network promoting the interests of pedestrians, cyclists and public transport and ensures linkages with the existing surrounding community <i>where practically possible.</i></p>
Dep265	Mr Sean Pursey		784090	Support	Buildings of Local Importance	Policy BE 2	<p>I write with regards to the Policy BE 2 "Buildings of Local Importance" contained in the LDP that is currently out for consultation.</p> <p>I was very pleased to see this included - I had spoken to a local Councillor earlier in the year expressing my concern about unlisted important local buildings and described something similar to this to him. Whilst I've seen many building owners locally take pride in the character and distinctiveness of the buildings they own, as you are aware its not always the case, some additional policy to help retain and improve the character of the local area is really welcomed.</p> <p>As a resident of Port Talbot the Station Road/Talbot Road corridor of buildings are of major concern, especially with no specific policy for the retention and restoration of architectural features. I can appreciate a conservation area would most likely not be suitable considering the current state of many of the buildings.</p> <p>The retention of the original shopfront on a specified property on Station Road has made a big impact on the visual appeal of the street but there was no obligation to do so by the owners - with the local authority passing an application to replace it. Regrettably the leaded glass panels in the shop front were removed to save costs in repairing them once they started to leak.</p> <p>Three years previous to this the timber sash windows to the upper floors were replaced with cheap PVC units. Is it intended that the policy will call for additional scrutiny on details such as replacement windows? I feel quite strongly about halting any further destruction to the visual appearance of Station Road by encouraging the reinstating of features - such as the bay window above a specified property - this was 'missing' for almost 30 years before being reinstated and now looks fantastic.</p> <p>If possible I would like some more information as to how such a list of buildings will be compiled, how the criteria will be decided, and who will be consulted to ensure appropriate decisions are made. I could certainly help with compiling information on local buildings which are worthy of some additional protection. I'm sure there would be a few others who would be interested in being involved in this process also.</p>
Dep1302	Mr Clive Reed	Swansea Valley Heritage	706760	Comment	Buildings of Local Importance	Policy BE 2	<p>The Environment Topic Paper 25 on Issues to be Addressed say that National Policy and Guidance indicates that the following matters in relation to the built environment should be addressed in the LDP. Historic Environment 6.1.1 Historic environment development plans should include locally specific policies for the conservation of the built environment. 6.1.2 says that in accordance with national guidelines the LDP will include policies that seek to:</p> <ul style="list-style-type: none"> • 1 protect the historic environment and built heritage

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>• 2 protect buildings of local importance.</p> <p>The ETP25 includes canals, canal design and safety, and public gateways. I wish to have included in the above, the historic buildings in and around Pontardawe. At the Cross Area and on Herbert Street, and especially a specific policy for the area of Pontardawe around the canal between the Upper Clydach River and Grove Road/Holly Street that includes the former canalside brewery (1838), the canal itself (1796), the canal aqueduct (1796), St Peters Church (1862). As a whole they form an historic area. To complement the canal in Pontardawe, the former Pontardawe Civic Society created Cae'r Pandy on the site of the former town gasworks. The gardens were handed over to NPTCBC for their maintenance in 1996. Nothing has been done to maintain the gardens and children's play area since that time and the whole site is very overgrown with scrub. I am sure the people of Pontardawe would like to have Cae'r Pandy restored to its former glory.</p> <p>I have been involved in all projects aimed at restoring Pontardawe's fortunes since 1988. The town received ERDF funding in 1988 to carry out regeneration work in its town centre. That work included improvements to the Swansea Canal in Pontardawe; much of what we see today is part of that with the rebuilt canal towpath. A large part of the improvements landscaped the canal through Pontardawe but unfortunately later "improvements" that were agreed by NPTCBC Planning Department destroyed that work by allowing a housing development to be built over those improvements. (St Peter's Parade housing development). I believe that decision was incorrect, and one that has created a huge embankment towering over the canal in Pontardawe.</p> <p>In 1994/96 Pontardawe again received European and Government support in the URBED designed Pontardawe Regeneration Project. That included regeneration of an historic canalside building, the former Pontardawe brewery. This is possibly the oldest surviving building in Pontardawe, built in 1838. Unfortunately, the Government withdrew funding for the project in 1996 and the whole of the regeneration scheme for Pontardawe collapsed including renovation of the old brewery. I wish to see financial and technical support from NPTCBC to bring this very historic building back into a better state of preservation and to save a part of Pontardawe's heritage.</p> <p>I wrote the Swansea Canal Society submission to NPTCBC on the Pontardawe Regeneration Project 2010 whereby thirteen million pounds was supposedly earmarked for the regeneration of Pontardawe, of which the Swansea Canal was to receive support for restoration works in Pontardawe. That would have seen the removal of the unsightly underpass that currently links the old and new retail parts of Pontardawe, and restored the canal southward as far as Cwmtawe Comprehensive School. The school would have benefited by having a water resource near the school for water-based activities, and it would have removed a barrier to the restoration of the Swansea Canal. That project did not materialise, but that is no reason not to support any development of the canal in future. I wish to see the above project resurrected.</p>
Dep419	Dr Gareth Hughes	Neath and Tennant Canals Trust	211886	Comment	The Canal Network	Policy BE 3	<p>The Neath and Tennant Canals Trust welcomes and fully supports the commitment in the LDP to protect and safeguard the canal network as defined in Policy BE 3 - The Canal Network, but strongly objects to the exclusion of sections of the canals, in particular the line of the Neath canal above Ysgwrfa Bridge, Aberpergwm.</p> <p>Attempts to engage NPT CBC over recent years in discussions relating to the development of the canals for tourism and recreation (1.1.11) have proved futile.</p> <p>The Trust is concerned that representations and objections made by various stake-holders and interested parties in response to the Draft LDP have been ignored.</p> <p>Following publication of the draft LDP the Trust prepared a discussion document entitled Beyond Restoration - Proposals for a Regeneration Strategy (appended below). Copies were distributed in February 2013 to stake-holders and interested parties, including members of the Cabinet, the Chief Executive and Head of Property and Regeneration of NPT CBC. To-date, no replies have been received from NPT CBC.</p> <p>Additionally, the Trust is informed that the document was not made available to those preparing the Deposit LDP with a view to informing the process relating to Policy BE 3.</p>

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							<p>The Policy statement - as reflected in Paragraphs 5.5.23 to 25 - consequently continues to perceive the development of the canals in terms of restoration rather than regeneration, and is informed accordingly.</p> <p>Reference in paragraph 5.5.23 to 'significant lengths of these canals have been restored to navigable standards', whilst historically correct, does not reflect the fact that restoration was undertaken on those two lengths of the Neath canal approaching 20 and 10 years ago. Given the failure to develop and provide boating facilities or a meaningful commitment to attract boaters, neither section post-restoration has or does offer 'opportunities for boating' (4.0.42). As a consequence, some restored structures are becoming derelict and un-navigable through disuse and neglect.</p>
Dep441	Mrs Jane Hennell	Canal and River Trust	376324	Object	The Canal Network	Policy BE 3	<p>The Canal & River Trust is the new charity set up to care for England and Wales' legacy of 200-year-old waterways, holding them in trust for the nation forever. The Trust has responsibility for 2,000 miles of canals, rivers, docks and reservoirs, along with museums, archives and the country's third largest collection of protected historic buildings.</p> <p>The Trust has a range of charitable objectives including:</p> <ul style="list-style-type: none"> • To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; • To protect and conserve objects and buildings of heritage interest; • To further the conservation, protection and improvement of the natural environment of inland waterways; and • To promote sustainable development in the vicinity of any inland waterways for the benefit of the public. • Proactively champion restoration of redundant waterways and the construction of new links, as a public good. <p>Within Neath Port Talbot County Borough The Canal & River Trust owns and manage part of the Swansea Canal (from Clydach to Ynysmeudwy) but is also supportive of the Neath and Tennant Canals which are still owned in the main by the Company of Proprietors of the Neath Canal. We firmly believe that all the waterways within the borough present a truly unique multi-functional resource and an opportunity to deliver unparalleled high quality benefits to their surrounding areas.</p> <p>The Trust notes also that a section of the Swansea canal between Trebanos and Pontardawe , which was safeguarded in the Draft LDP, is excluded in Policy BE 3. This omission may preclude the creation of a unified Swansea canal or the proposed 35-mile integrated waterway scheme involving all three canals via the SA1 development in Swansea. Moreover it will have the effect of isolating and disadvantaging Pontardawe and the northern section of the canal.</p> <p>We wrote to the Council in 2011 advocating the continuing protection of the entire route of the Swansea canal however, the Council responded that the Strategy recognises and acknowledges the financial and practical difficulties of restoring the portion of the canal route. The policies & proposals in the LDP have to be deliverable, realistic and 'sound'.</p> <p>The Trust believe the decision to omit this section fails the test of soundness under section CE2 in that the policy is not appropriate as it has not considered the relevant alternatives and is not founded on a robust and credible evidence base.</p> <p>In addition the policy also fails test CE4 in that the omission of any section of canal does not allow flexibility to reflect changing circumstances. Indeed the omission of these sections will only serve to impede the likelihood of the canal restoration, thus possibly preventing restoration even when changes occur such as redevelopment opportunities or funding bids.</p> <p>Other canal restoration projects have overcome similar issues and constraints. It is vital that the aspiration to complete the restoration project is not only included in the Development Plan but that the benefits of providing the full canal is fully recognised and promoted elsewhere such as the Council Economic Development Strategies and Green Infrastructure policies.</p> <p>At paragraph 5.5.24 the council seeks to protect the canals where appropriate, in particular in areas where development could</p>

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							<p>compromise their use and future restoration. Remaining extant lengths of canal and lengths where there is a realistic prospect of restoration are safeguarded by the policy thereby ensuring that they are not adversely affected by future development. Such lengths of canal are identified on the Proposals Map.</p> <p>At 5.5.25 the stretches of canal where restoration currently appears to be less likely, but may be feasible in the future, are also protected by the policy to ensure that new development does not cause any physical impediment.</p> <p>By implication therefore the section not protected is not considered deliverable during the plan period however there is little evidence given to justify on what basis this assumption is made. The proposals maps indicate that this length of canal has no competing interests, and in the absence of locks or significant impediments to restoration, would appear to meet the criteria used by the Council in determining which stretches are to be safeguarded.</p> <p>Throughout the document there is evidence of the Councils recognition of the benefits and importance of the canals and therefore as policy which may prevent the full restoration, with all the regeneration benefits that may bring, appears both incongruous and inconsistent. While the restoration of the canal to full navigation may be a distant aspiration it is achievable. Most Canal restoration projects have faced similar issues in the past. Waterways have played a role in regenerating existing urban areas, with successful examples including the revitalising of areas within Manchester, Birmingham, and Sheffield. By providing an attractive environment and an interesting backdrop, waterfronts, whether canals or rivers, can draw in residents and visitors. In addition, the construction of the Waterway will itself help support employment.</p> <p>Current restoration projects such as the Cotswold Canals in Gloucestershire and the Wilts and Berks Canal face similar issues in that parts of their original route have been in-filled, re-developed or blocked by other major infrastructure such as railway lines and even motorways. These problems have been encountered and overcome by most canal regeneration projects in the country. The full restoration of the Swansea Canal is possible and should not be written off by the Council, its restoration is entirely possible through partnership working. To achieve this it is crucial that the opportunity to provide the remaining missing stretch remains an option. Without this further investment in the canal is less likely and may well result in the degradation of the existing stretches of canal.</p> <p>It is vital that the aspiration to complete the project is not only included in the Development Plan but that the benefits of providing the full canal is fully recognised and promoted elsewhere such as the Council Economic Development Strategies and Green Infrastructure policies.</p> <p>The Trust believes that increasing the size of the navigable waterway network for public benefit is one of our key charitable purposes. A fully restored Canal network in South Wales would bring back into use a valuable local heritage asset for the benefit of local communities and the economy. The restored canal network would also form an important part of the area's Green Infrastructure and act as a sustainable transport network, both important aspects of the emerging LDP.</p> <p>The Trust has no ownership interest in the Neath and Tennant Canals, but we fully support the Neath & Tennant Canal Trust (NTCT) in their objection to the exclusion of the line of the Neath canal above Ysgwrfa Bridge, Aberpergwm. We understand that the NTCT have prepared a discussion document entitled <i>Beyond Restoration - Proposals for a Regeneration but that this may not have been used to inform Policy BE 3</i>.</p> <p>The NTCT rightly state that although it is correct that significant lengths of restoration was undertaken on the Neath canal this was nearly 20years ago. The canal network needs constant care in order to remain useable and as soon as a section is restored it immediately begins to degrade, either due to usage, or in some cases lack of usage. Without facilities to attract boaters, some of the previously restored structures are becoming derelict and un-navigable through disuse and neglect.</p> <p>The Trust believes that increasing the size of the navigable waterway network for public benefit is one of our key charitable purposes. The fully restored Canal would bring back into use a valuable local heritage asset for the benefit of local communities and economy and would also form an important part of the area's Green Infrastructure network and act as a sustainable transport network in accordance with the emerging LDP.</p>

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							<p>In light of the above, the Trust believes the decision to exclude lengths of the canals from being safeguarded fails the test of soundness.</p> <p>As well as safeguarding the entire length of the canals without omissions the Canal & River Trust consider that Policy BE 3 does little to promote the strategic regeneration of the canals. If the canals are to realise their potential, the Trust is strongly of the opinion that the LDP should include a Strategic Policy to actively encourage restoration and regeneration and ensure that development alongside the route of the canal is suitable.</p> <p>We therefore suggest that the policy is amended.</p> <p>Policy BE 3 - The Canal Network</p> <p>Suggested new wording</p> <p>Development on the route of, or adjacent to, the Swansea, Neath or Tennant Canals must not prevent the improvement, reconstruction, restoration or continued use of the canals or towpaths.</p> <p>All developments adjacent to the canals must respect their character, setting, biodiversity and historic value as well as have regard to improving and enhancing views along and from the canals. Environmental improvements to any canal's appearance will include enhancement of its historic and biodiversity value.</p> <p>In assessing any proposals for development along or in the vicinity of any of the Districts three canals, the Council will have regard to any relevant adopted design guidance.</p> <p>Reasonably related financial contributions may be sought via Community Infrastructure Levy or, where appropriate, via legal agreements for contributions towards the improvement or restoration of the related canal and towpaths.</p>
Dep467	Mrs Margaret Gwalter	Inland Waterways Association	588063	Object	The Canal Network	Policy BE 3	<p>In view of the points made in 5.5.23, 5.5.24 and 5.5.25 why are not the remaining stretches of canal safeguarded as in the UDP. In particular why is the length from the southern edge of the playing fields to Pontardawe Town Centre, protected in earlier drafts of the document, not now safeguarded especially as in view of the gathering momentum for restoring the Swansea Canal and the relative ease of restoring this stretch, its restoration should be easily achieved within the lifetime of this LDP. Therefore the Association urges that the wording of 5.5.22 be altered to include protection for this stretch.</p> <p>Both Swansea and Neath Port Talbot Councils are in favour of the Integrated Waterway Project linking all three canals mentioned in 5.5.23 via the River Tawe and this section is a vital part of that plan. Failure to protect the lengths of canal as in the UDP may inadvertently lead to obliteration of some sections leading to the failure of this project.</p> <p>The Association acknowledges that the upper reach of the Swansea Canal would be extremely costly and difficult to restore but it should be protected so as not to preclude its ultimate restoration as well as for its heritage value including some important structures, and for the supply of water to the lower reach where it is vital source of water to local industry.</p> <p>The tone of the policy implies that the canals are an obstacle which must be taken into account rather than the catalyst for regeneration that has been so successful in other places.</p>
Dep697	Mr David Watkins	Natural Resources Wales	786443	Object	The Canal Network	Policy BE 3	<p>Paragraph 5.5.22 Policy BE 3 The Canal Network</p> <p>We support the policy but would highlight that local rivers and canals are vital resources for local industry, amenity and the environment. Water is abstracted from various locations for industrial purposes particularly the River Neath and River Afon. It is essential that due regard is given to their sustainable limit and appreciation that water is a finite resource which needs protection.</p>

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Dep1262	Mr Martin Davies	Swansea Canal Society	768521	Object	The Canal Network	Policy BE 3	<p>1. Amendment Required: Change the wording of 5.5.22, 1(a) to:</p> <p>'In order to protect and conserve the canal network the following lengths of canal will be safeguarded:</p> <p>(a) The Swansea Canal at Trebanos from the County Borough Boundary to Pontardawe Town Centre.'</p> <p>The protection that was previously given to the 800 yard piped section of the Swansea Canal between the southern edge of the Pontardawe playing fields and Herbert Street, Pontardawe (as stated in the 2008 and 2011 Unitary Development Plan, POLICY RO6-CANALS, Part B) is to be removed in the current Deposit Plan.</p> <p>The blue line of the canal from the playing fields to Herbert Street has also been removed from Proposal Map 16. This should be replaced to tally with the above amended wording.</p> <p>REASONS FOR THE AMENDED WORDING:</p> <p>The removal of the protection from this piped section undermines the potential to recreate a fully restored, multi-purpose waterway between Ynysmeudwy and Clydach. This is in contradiction to the aims set out in the 2013 Deposit Plan, page 78, 5.5.24:-</p> <p>'The policy seeks to protect the canals where appropriate, in particular in areas where development could compromise their use and future restoration. Remaining extant lengths of canal and lengths where there is a realistic prospect of restoration are safeguarded by the policy...'</p> <p>The continued protection of this piped section is vital to the vision of the restoration of the canal. It is all on land owned by Neath Port Talbot and no other buildings intrude onto the pedestrianised roadway covering the pipe until, as the Atkins Feasibility Study of May 2002 states, 'a pedestrian subway in the corner of the car park leads directly to the Pontardawe Aqueduct. The restored canal would have to negotiate the embankment carrying the link road to the A483. While there is plenty of headroom, getting a straight alignment onto the aqueduct needs to be addressed'.</p> <p>The problems are still as stated by Atkins but the prospect of restoration is certainly 'realistic'.</p> <p>Richard Dommatt who was the waterway engineer in charge when the section alongside the playing fields was filled in states that restoration of the canal was thought through even while this was being done. The pedestrianised subway under the A474 was actually built in order to take the restored canal.</p> <p>All these facts convince the Swansea Canal Society that restoration of this section is 'realistic' and therefore must be protected by the wording of 5.5.24.</p> <p>The Swansea Canal Society has made much progress, in partnership with Glyndwr Cymru and the Waterways Recovery Group, in maintaining and restoring the canal. The feasibility study on restoring the 150 yard piped link at the Old Highways Depot in Pontardawe Road, Clydach, is now reaching the discussion stage with Swansea Council and the Canal and River Trust.</p> <p>Every week volunteers from the SCS perform all manner of repair work on the canal. Members currently contribute an average of 1,000 hours per month to the canal restoration.</p> <p>Our week long camp with the Waterways Recovery Group and Glyndwr Cymru this September at the Trebanos Locks achieved much coverage in the local and National media. The WRG will be returning in 2014 to continue the restoration of the two locks.</p> <p>It is also noted that NPT's own Regeneration Team has also been investigating the removal of the obstruction to navigation caused by the low bridge at Holly Street.</p>

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							<p>In summary, the removal of the protection of the canal route in the piped section from the playing fields to Herbert Street, Pontardawe would be to completely override the comments in the NPT Pre-Deposit Plan of 2011 which stated:-</p> <p>'The Swansea Canal restoration will be focused between Trebanos and Ynysmeudwy' (page 88).</p> <p>This volte-face will be a disincentive to all those who work towards a restored canal from Clydach to Ystalyfera.</p>
Dep1264	Mr Martin Davies	Swansea Canal Society	768521	Object	The Canal Network	Policy BE 3	<p>2. Amendment required: Change the wording of 5.5.22 1(b) to:-</p> <p>'In order to protect and conserve the canal network the following lengths of canal will be safeguarded:-</p> <p>b) The Swansea Canal from Pontardawe Town Centre to the Twrch Aqueduct, Ystalyfera.</p> <p>Section 8 of the NPT Pre-Deposit Plan of 2011 (page 88) states that:-</p> <p>'The canal system will be promoted as a local and visitor resource. This will work towards providing an integrated Swansea Bay Waterway Network comprising the Neath, Tennant and Swansea Canals.'</p> <p>This is still the policy of Neath Port Talbot Council. Yet while all around the UK canals are seen as an economic and tourist asset the route of the Swansea Canal north of Godre'r Graig is being left to decay.</p> <p>Page 20 of the same Pre-Deposit plan states that 'the Canal Network is an important part of the County Borough's historic heritage. It forms part of a network of green corridors which encourages walking and cycling and attracts visitors to the area'.</p> <p>However, the condition of this 'historic heritage' on the canal route north of Godre'r Graig and the Swansea Canal Nature Reserve is deplorable. The land is owned by Neath Port Talbot and is the home to two CADW scheduled ancient monuments only a half mile north of the Nature Reserve.</p> <p>The Engine House of the Crimea Colliery which had direct access to the Swansea Canal is now obliterated by vegetation and is almost lost to the world. Lock 17 of the Swansea Canal (Thick's Lock), a complete lock which had a dry dock and ship building yard attached would be in a similar condition were it not for the work of the SCS and the Waterways Recovery Group who have managed to rescue it from the jungle.</p> <p>And these two remarkable heritage buildings are part of the canal network which Section 3 of the pre-deposit plan of 2011 describes as 'an important heritage feature and tourism asset'. At very little cost this section along the A4067 containing the remains of Locks 15, 16, 17, 18, 19 and 21, the high level canal in water above the new ASDA Store (another listed structure), and the remarkable Twrch Aqueduct (yet another listed building) would make a remarkable Heritage Trail leading to the Nature Reserve and the Canal in full water.</p> <p>The SCS hopes that when, in accordance with 5.5.21 of the 2013 Deposit Plan, an inventory of 'Buildings of Local Importance' are compiled all these two hundred year old structures will be included.</p> <p>The Pre Deposit Plan of 2013 stresses on page 78, 5.5.25 that:-</p> <p>'The stretches of canal where restoration currently appears to be less likely, but may be feasible in the future, are also protected by the policy to ensure that new development does not cause any physical impediment'.</p> <p>One hopes that this sentence is adhered to and this previously protected line from Godre'r Graig to Ystalyfera Aqueduct does not suffer a similar fate to the east walls of Locks 15 and 16 which were used to build the foundations of the A4067 in 1972.</p>
Dep1282	Mr John Andrew	Swansea Community Boat	789755	Object	The Canal Network	Policy BE 3	<p>The considerable value of the disused section of the Neath Canal between Ysgwrfa Bridge and Glynneath should be recognised in</p>

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	Davies	Trust					<p>the LDP, primarily because of:</p> <ul style="list-style-type: none"> • the strategic significance of creating a "destination" and the economic benefits that this would bring to Glynneath. • the need to reinstate the water feeder to ensure adequate water levels and the operation of locks on the upper Neath Canal. • the opportunity to investigate using the upper Neath Canal as a SuDS. <p>Revise the wording of paragraph (d) : "The Neath Canal from Briton Ferry to Glynneath".</p>
Dep1283	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	The Canal Network	Policy BE 3	BE3(2): Delete "where possible".
Dep1284	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	The Canal Network	Policy BE 3	<p>In view of the lack of a guiding vision for the 'The Canal Network', the Trust suggests that a new paragraph should be added to Policy BE3 :</p> <p>" 3). The County Borough will invite the City and County of Swansea to jointly convene a working group comprising the canal owners, interested statutory bodies and representatives of stakeholder groups. This group will :</p> <p>a. Review the existing feasibility studies and draw up a definitive map of an integrated waterways system based on the Neath, Tennant and Swansea canals, Tawe river navigation, Swansea Marina and Swansea SA1 waterspaces.</p> <p>b. Examine how financial sustainability could be achieved if the waterways were to be used for increased leisure usage including boating, and be developed as a major tourist destination.</p> <p>c. Propose a management structure.</p> <p>d. Examine how an integrated waterways system could be developed as an extensive green corridor for wildlife and biodiversity.</p> <p>e. Identify sources of funding to upgrade and connect the separate waterways."</p>
Dep1256	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	The Canal Network	Policy BE 3	<p>Swansea Community Boat Trust is a registered charity. The Charitable Objects include the possibility of operating canal boats in Neath Port Talbot, as well as Swansea, and making local people more aware of the natural and industrial heritage of the waterways.</p> <p>By the end of its second full operating season, the Swansea Community Boat will have carried 19,000 passengers from Swansea Marina to Morfa. A new purpose-built vessel has been commissioned for the 2014 season, for use on the Tawe river navigation. Discussions are taking place with Swansea Council with a view to installing a landing stage at Morfa.</p> <p>The Trust has an interest in the creation of an integrated waterways system in the Neath and Swansea valleys, as this would facilitate a possible extension of its boating operations across the Swansea Bay City region.</p> <p>Response to Policy BE3 'The Canal Network'.</p> <p>Although it is encouraging to see the Neath, Tennant and Swansea canals designated as "The Canal Network", Policy BE3 is inconsistent and lacks an overarching strategic vision.</p> <p>5.5.22 1). The Neath Canal is safeguarded from Briton Ferry to Ysgwrfa Bridge, Aberpergwm, without mention of the infilled section at Abergarwed. We agree with this, though we make additional comment in section 2 below that the safeguarded Neath Canal route should be extended to Glynneath.</p> <p>The Swansea Canal is treated differently and is listed as 2 separate portions, with the connecting culverted section south of Pontardawe not included.</p> <p>To be consistent, the LDP should merge paragraphs (a) & (b). Revise the wording of the combined paragraph :</p>

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							<p>"The Swansea Canal from Trebanos to Godre'r Graig".</p> <p>In view of its strategic importance if the Swansea Canal is to be restored as a continuous waterspace between Clydach and Pontardawe town centres and beyond, the culverted section south of Pontardawe must also be designated on the Proposals Map as "A Safeguarded Canal Route BE3".</p> <p>The Trust believes that there is a need for further work to identify and appropriate "destination" for the upper Swansea Canal.</p>
Dep602	Joanna Jenkins		786824	Object	Coastal Corridor Regeneration Schemes	Policy CCRS 1	<p>I have read and wish to comment on the Neath Port Talbot Local Development Plan 2011 - 2026 (LDP).</p> <p>My comments relate to the strategy, including the "overarching vision, objectives and key policies" contained within the LDP, in particular the fact that no regard seems to have been taken of the recent suggestion that the Neath Port Talbot Magistrates' Court will close. I should be obliged if you would consider the following points in your deliberations.</p> <p>While, in general terms, I welcome the plans to redevelop Neath Town Centre [Planning Application P2013/0863: Redevelopment of Neath Town Centre for a Mixed Use Development], I am wholly opposed to any suggestion that could ultimately lead to Neath Port Talbot losing its magistrates' courthouse.</p> <p>There has been a long standing accepted presumption that the redevelopment plans for the town centre would be accompanied by a managed relocation of Neath Port Talbot Magistrates' Court to the county court in Neath. To allow this to happen, plans had been drawn up to create a secure, two courtroom facility; with an enclosed walkway linking the courthouse and the neighbouring police station.</p> <p>This presumption accorded with the "Neath Town Centre Regeneration Scheme".</p> <p>Phase 1 of the proposed redevelopment plan [P2013/0863] seeks full planning application for the demolition of "the Magistrates' Court building and associated car parks".</p> <p>It now appears highly likely however, that this application; coming as it does at the same time as HM Courts and Tribunals Service (HMCTS) considers the future of Neath Port Talbot Magistrates' Court; could see the relocation of all criminal work to the City and County of Swansea, and the creation of one Local Justice Area serving Neath Port Talbot and Swansea.</p> <p>HMCTS's stated consultation policy objective "is to reduce excess capacity in the HMCTS estate in South Wales and allow the regeneration of the Neath local area to commence". The loss of the courthouse is a major issue. It has the potential to affect each and every one of the approximately 135,000 people living in Neath Port Talbot. It will also see the closure of the last remaining probation facility in the county borough: the Wales Probation Trust satellite office at Neath Port Talbot Magistrates' Court.</p> <p>Having lost its criminal court in April 2011, Port Talbot is now home to a new courthouse; the Port Talbot Justice Centre. This facility is not a possible alternative location for criminal work: it deals with tribunal hearings; houses the HMCTS Wales Fixed Penalty Office, and the HMCTS Wales Enforcement Contact and Compliance Centre officers; and has no cells.</p> <p>The Neath Town Centre Redevelopment Planning Statement September 2013 (NTRPS) is right to say that the 'proposed development represents considerable improvements to this area . . . and will indeed enhance the surrounding".</p> <p>Unless an alternative location for the courthouse can be found within the county borough however, Neath Port Talbot will lose a key facility; the loss of which will drive a significant amount of business out of the county.</p> <p>A vibrant and thriving town centre needs a mix of buildings including key municipal buildings. While no one could suggest that the Neath Magistrates' Court, built in 1977, is of any architectural merit, its function is of vital importance to the historic market town of Neath, and the county borough it sits within. Its loss will also see individuals (defendants, victims, witnesses, solicitors,</p>

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							<p>magistrates, and court users) travelling large and in some instances, wholly unacceptable distances. Many will find the additional travel and parking costs prohibitive.</p> <p>Turning to the Wales Spatial Plan, and the Swansea Bay Spatial Plan, I note the emphasis on "People, Places, Future". The plans identify a number of key themes:</p> <ul style="list-style-type: none"> • the need to take account of different challenges and opportunities; • improving accessibility; • the need for a strong network of urban centres; • improved shopping, leisure, community and cultural facilities; • with good access to services being a key contributor to quality of life; and a range of sustainable transport options so people can move easily between where they live, work and access key services. <p>The vision for the area is for "A network of interdependent settlements with Swansea at its heart which pull together effectively as a city region with a modern, competitive, knowledge-based economy designed to deliver a high quality of life, a sustainable environment, a vibrant waterfront and excellent national and international connections". While I wholeheartedly support this vision, I would argue that the provision of 'local justice' is a key element of a civilised, and a safe society.</p> <p>The LDP deals with the question of safety in some detail. It is an important theme: "Create a NPT where everyone has an equal opportunity to be healthier, happier, safer and prosperous". [The Single integrated Plan: 1.2.35.]</p> <p>"People in NPT feel safe and are safe." [Outcome 2: Safer]. This outcome aims to improve people's safety through: "Reducing the impact of crime and the fear of crime"; "Reducing the incidence of Domestic Abuse"; "Reducing the numbers of young people involved in criminal behaviour"; and "Reducing the harm of substance abuse".</p> <p>If a move to Neath County Court has to be discounted; and I vehemently refute the reasoning used by HMCTS to support that suggestion; it is time to find another suitable venue within the county borough.</p> <p>I urge Neath Port Talbot County Borough Council to insist that an alternative location for a criminal courthouse is found. Great care needs to be taken. Once this important facility is lost it will never be regained.</p> <p>I therefore respectfully suggest that the consequential loss of the courthouse is something that has to be considered as part of the LDP. Neath must not be downgraded in this way. It is important that the county borough "feels safe, and is safe".</p>
Dep940		Oak Regeneration Incorporated	589629	Object	Coastal Corridor Regeneration Schemes	Policy CCRS 1	<p>As the plan does not respond to key issues referred to under 'KI 14: There are significant areas of brownfield (previously developed) land requiring remediation and regeneration' and therefore fails to satisfy the above coherence and effectiveness tests, the following change to the plan (highlighted in bold) is proposed:</p> <p>Policy CCRS 1 Coastal Corridor Regeneration Schemes</p> <p>Mixed use regeneration schemes are designated at the following locations:</p> <p>CCRS1/1 Neath Town Centre Redevelopment CCRS1/2 Glanafan Comprehensive School Port Talbot CCRS1/3 Afan Lido Land, to the rear of Tywyn School, Sandfields CCRS1/4 Margam Surface Mine</p>
Dep735	Mr Phil	City & County of Swansea	196411	Object	Employment Allocations	Policy EC 1	<p>CCOS request a refinement of the employment allocations and strategy to define more specifically the uses and business sectors that NPTCBC considers appropriate at the locations identified. This is particularly relevant in respect of B1 office uses, which the</p>

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	Holmes						Council considers should be directed in the Plan towards in-centre locations in line with national planning guidance, and/or specific key business park locations that are orientated towards certain sectors. The Council has for example made clear its objections to a planning application submitted in 2013 to NPTCBC by the Welsh Government for a large quantum of speculative office floorspace at land adjacent to Amazon, in view of the potentially highly significant adverse impact such development would have on Swansea City Centre. The Peter Brett Study findings are clear that the regional economy has a certain level of realistic growth potential and that there is a maximum level of floorspace for office development that is required in order to deliver the required growth targets. It identifies that a key element of the spatial strategy in this context is to direct such development towards in-centre locations, and specifically Swansea City Centre, to support regeneration initiatives. This refinement is considered necessary not only to safeguard the interests of both NPTCBC and the City and County of Swansea but is also in the interests of supporting economic growth for the City Region.
Dep739	Mr Mark Newey	Welsh Government	211935	Object	Employment Allocations	Policy EC 1	<p>Economic development / employment</p> <p>The Economic Study recommends that 20 hectares of land are identified for B1, B2 and B8 uses to support the 3,850 jobs. Policy EC 1 'Employment Allocations' allocates 96 hectares for B class uses. The authority has allocated a significantly higher level of employment land than the authority's evidence base recommends. We are supportive of the authority's aspiration to generate economic development and create jobs and therefore do not object to this level of growth. However, we do have concerns regarding the relationship of employment allocations to the level of housing provision. The authority's chosen growth option (EE Adj.+ scenario) to generate 3,850 jobs recommended the allocation of 20 hectares of employment land and provision of 8,560 additional homes. Whilst there is no direct mathematical relationship between the number of jobs and homes, if the development of employment land was to exceed 20 hectares, this could generate the need for additional homes above 8,560 dwellings. The authority should monitor the take up of employment land and have a mechanism in place to facilitate the release of additional housing land, should the development of employment land exceed 20 hectares .</p>
Dep771	Mr Mark Newey	Welsh Government	211935	Object	Employment Allocations	Policy EC 1	<p>Policy SP11 Employment growth & EC 1 Employment allocations</p> <p>The policies' supporting text make reference to a proportion of the Baglan Bay strategic employment site being developed for ancillary uses to support the wider function of the employment area and satisfy the needs of the energy sector (LDP paragraph 5.2.3) i.e. cafes, day nurseries & commercial services on existing employment sites (LDP paragraph 5.2.5). There is no reference to ancillary facilities and services within the policy. The policy should be worded to ensure that it is able to deliver what the Council is seeking to achieve.</p>
Dep630	Mr David Watkins	Natural Resources Wales	786443	Object	Employment Allocations	Policy EC 1	<p>Paragraph 5.2.8 Policy EC1 Employment Allocations - Baglan Bay Strategic Employment Site</p> <p>We support the redevelopment of this brownfield site, which has seen and continues to see a large area of contaminated land being brought back into beneficial use.</p> <p>However any proposed development at this site that would result in increased emissions to air, or require increased levels of water abstraction from the Tennant Canal would need to be considered under the Conservation of Habitats and Species Regulations 2010 in relation to any potential impact on the Crymlyn Bog SAC.</p> <p>We therefore advise that the supporting text to this policy should clarify that development proposals at this site may need to be subject of a project level HRA to ensure that the development of the site will not adversely affect the integrity of Crymlyn Bog SAC.</p>
Dep1293	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	Employment Allocations	Policy EC 1	<p>Whilst EC1 allocates an amount of land for B class uses at Baglan Bay, the description of the site and its potential in paragraphs 5.2.8 to 5.2.12 explain the approach that will be adopted to development proposals there. This recognises that because of its size, condition, position and capacity, Baglan Bay has potential to capture or tackle a full range of challenges and opportunities. These could be directed at specific sectors or a broad spectrum of economic activity or sectors, and provide space and land for the very largest requirement or the very smallest. As paragraph 5.2.11 of the DLDP recognises, the site can capture very large and mobile investment projects including energy generation and data and technology schemes in emerging sectors.</p>

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							<p>Policy EC1 formalises this position. It acknowledges that part of the Baglan Bay allocation could meet the requirements of the Regional Waste Plan and refers to it as a preferred site for In Building Waste Treatment Facilities. The development of energy generation projects is also supported.</p> <p>Policies EC2 and EC3 make similar provision for the safeguarded area of Baglan Bay.</p> <p>Regeneration at Baglan Bay is already underway through a number of initiatives. To the east of the site is Baglan Energy Park which includes modern manufacturing units, office space and the combined-cycle gas turbine power plant. Planning permission is also in place for a second power station and further to the west development of the sites first renewable scheme (a PV array) has recently begun. These schemes show that the legacy of previous uses can be dealt with and the land can be successfully redeveloped.</p> <p>The remainder (and clear majority) of Baglan Bay is vacant and cleared. This area is already served by water, sewerage, electricity, gas and telecommunications services with the Energy Park and power plant having the full range of services need to undertake its operations. The existing site infrastructure networks are likely to provide significant capacity for new uses. Access to the strategic and local highway network is excellent (and will improve) and the site is well placed for improved public transport links.</p> <p>There has also been recent interest in the site from energy generators and business occupiers. This is indicative that schemes can be implemented quickly and affordably on the site. In part this responds to SMDL's continued programme of remediation. However it is also a result of SMDL's control over the site and its experience in practical regeneration.</p> <p>SMDL has completed a development framework for Baglan Bay which organises uses on the site and subdivides it into a number of zones or phases. This shows that:</p> <ul style="list-style-type: none"> a) a full range of activities can be located there b) small units and schemes can be built as well as very large and largely unconstrained buildings c) existing access and infrastructure networks need not change to achieve this d) there is scope for civic uses and activities with special or specific characteristics as well as more conventional occupiers e) there is also scope for a locally significant area of housing on the southern parts of the site, together with some softer community uses. <p>The framework has been tested from a technical and environmental perspective and will form the context for the planning applications that will come forward at Baglan. Interest has already been expressed in a range of activities extending from renewable energy generation to a small number of more conventional office uses.</p> <p><i>Development Potential</i></p> <p>As indicated above, the site has potential to accommodate all key economic sectors and lends itself to a complete range of companies. This has driven a sectoral approach at a site wide and strategic level, which seeks to respond to the policy and vision for the area and the most recent assessment of economic conditions and potential. The proposed approach is flexible and allows a focus on one or two sectors whilst not limiting business and economic activity across the whole spectrum. This is considered the most appropriate blend of commercial potential and strategic aspiration.</p> <p>This concept has informed a refinement of the zoned approach which underpins previous masterplans and sees the site broadly (and not precisely) organised into four main areas. These focus on:</p> <ul style="list-style-type: none"> a) business and innovation, clustered around the existing energy park b) advanced manufacturing, construction and logistics which has the potential to connect to the new Swansea University Bay Campus (and other local initiatives)

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							<p>c) energy and green technology</p> <p>d) civic activities and facilities (based on known requirements)</p> <p><i>Phasing</i></p> <p>Early delivery of part of the site continues at Baglan Energy Park and the solar park which is currently being built. Recent interest in the site from energy generators and other occupiers indicates that these schemes can, and will be, implemented as the plan period progresses. Some of these will take considerable areas of the site for single projects. The presence of existing and substantial infrastructure will be a key benefit, and the fact that the land is already cleared and is unoccupied means that any new activity is likely to be new rather than displaced.</p> <p>As a result of the on-going programme of remediation works across the site (in terms of investigation, remediation and monitoring), ground conditions present no fundamental constraint to the way in which development will progress. This has recently been demonstrated with the approval and start of the PV array in the western part of the site.</p> <p>Outputs and Delivery</p> <p><i>Sustainability</i></p> <p>The site is a clearly a sustainable location for new economic activity. It is well located and consists of wholly previously developed land. New development has the potential to provide a final and positive solution that deals with the legacy of past use and improves environmental appearance and performance. It can also attract users, sectors and activities which are sustainable or which improve the efficiency of resource production, consumption and reuse.</p> <p><i>Economic Contribution</i></p> <p>Baglan Bay will make a major contribution to the economic potential and performance of Neath Port Talbot and Swansea Bay. The sector approach suggests that may be as much about activity and support as it will be about new job generation. It is also like to take place within the plan period and beyond. Seen like this Baglan Bay is a significant and important initiative even if it warrants a slightly unconventional approach to forward planning exercises like the LDP (which are area based and time managed).</p> <p>The number of new jobs that could be created is significant. With the sector approach this might not be as high as the land areas suggest (simply because some of the sectors are not as labour intensive). However, development in these sectors will still support local and national objectives and the delivery of important targets. This underscores the importance of Baglan Bay which sits in an area that needs new jobs and can connect (and become part of) a series of initiatives which have local, regional and national potential.</p> <p>It is equally important to recognise that Baglan has the (unique) potential to accommodate very large projects or those with specific requirements for secure power or high levels of security. In addition, because of its combination of size, strategic position and lack of constraint, is can attract and deliver mobile projects, those associated with logistics and data processing and management and those which may be considered bad neighbours in other locations. As stated above, this may mean that headline job generation is low, but this also means that these often essential parts of an areas (or city regions) economic and civic infrastructure can be delivered in a way which leaves other more conventional sites to deliver other more conventional forms of economic development.</p> <p><i>Market and Commercial Potential</i></p> <p>There are challenges to the delivery of economic growth - and these are serious, significant and concern matters that are outside</p>

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							<p>of local and probably national control or influence. As a result, interest and take up has been low and, without intervention, it is very difficult to predict when and how conditions will change.</p> <p>However, as well as the sectors already referred to, there is also clear potential for a series of target sectors and initiatives to be attracted to NPT or to start business there. Baglan provides an ideal location to support these initiatives. In terms of the WG identified sectors, the 'Advanced Manufacturing and Materials' and 'Life Sciences' are obvious potential candidates, given the site's location and proximity to Swansea University and the new campus on Fabian Way.</p> <p>Baglan is very well placed to capture and accelerate interest in the new Campus. It can also build on a number of other current and proposed initiatives including Glamorgan University's existing research facility and Neath Port Talbot College's School of Construction and Built Environment. Links to significant local employers and to the neighbouring Coed Darcy project are also possible either because of proximity or because of other strong connections.</p> <p>Baglan can clearly accommodate more conventional requirements (and already has a track record in doing this). There are a number of firms on the site and the area regularly features on the list of sites for potential requirements across the economic development spectrum (from offices to factories and warehouses to civic uses and activities). As stated a number of times already, the area is also clearly attractive to the energy sector - with power stations and renewable (PV) schemes either there or proposed.</p> <p>The site can deliver a range of projects and activities of all sizes and types - and has special characteristics which make it suitable for activities which may be difficult to accommodate elsewhere. This can be done sustainably on previously developed land that lies in a locally and regionally accessible location.</p> <p>Because of these unique characteristics, two policy approaches could have been adopted:</p> <p>a) Establishing a specific policy (or small series of policies) for Baglan Bay that would reflect and capture its potential. This approach would follow (but update) the approach used in the adopted UDP.</p> <p>b) Allocating and safeguarding land for conventional employment generating uses under the plans other policies.</p> <p>The DLDP signals the scale and potential of Baglan Bay and recognises that it will be a suitable and available location for a variety of uses and activities. Some of these will be quantifiable and it sends an amount of new development to Baglan Bay that helps with the plans land delivery targets. Elsewhere, it safeguards an existing area for other economic activity. This appears to be - in part - a response to comments from the Welsh Government about the amount of employment land that the plan allocates.</p>
Dep278	Mr David Llewellyn	Bridgend County Borough Council	199968	Support	Existing Employment Areas	Policy EC 2	<p>Policy EC2/9 - Existing Employment Areas</p> <p>BCBC welcomes the designation of Kenfig Industrial Estate as an existing employment site and notes that 7.13ha (Employment Topic Paper refers) of the site is still available for development. Kenfig Industrial Estate is located very close to Bridgend County Borough and offers significant employment opportunities for its residents.</p>
Dep738	Mr Phil Holmes	City & County of Swansea	196411	Object	Existing Employment Areas	Policy EC 2	<p>CCOS request a refinement of the employment allocations and strategy to define more specifically the uses and business sectors that NPTCBC considers appropriate at the locations identified. This is particularly relevant in respect of B1 office uses, which the Council considers should be directed in the Plan towards in-centre locations in line with national planning guidance, and/or specific key business park locations that are orientated towards certain sectors. The Council has for example made clear its objections to a planning application submitted in 2013 to NPTCBC by the Welsh Government for a large quantum of speculative office floorspace at land adjacent to Amazon, in view of the potentially highly significant adverse impact such development would have on Swansea City Centre. The Peter Brett Study findings are clear that the regional economy has a certain level of realistic growth potential and that there is a maximum level of floorspace for office development that is required in order to deliver the required growth targets. It identifies that a key element of the spatial strategy in this context is to direct such development towards in-centre locations, and specifically Swansea City Centre, to support regeneration initiatives. This refinement is considered necessary not only to safeguard the interests of both NPTCBC and the City and County of Swansea but is also in the interests of supporting economic growth for the City Region.</p>

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Dep780	Mr Mike Webb	RSPB	420284	Object	Existing Employment Areas	Policy EC 2	<p>The RSPB objects to the lack of consideration of biodiversity in the text accompanying policy EC1/1. Reference is not made to a biodiversity resource of Wales-national importance, viz breeding lapwings. Lapwings are red-listed in Wales, due to steep declines in the breeding population, and are present on a list of species pursuant to s42 of the NRC Act, as a species of principal importance for the purposes of conserving biodiversity. The site holds more than 1% of the Welsh breeding population, and is therefore of Wales-national importance.</p> <p><u>Tests of Soundness :</u></p> <p>The deposit draft LDP fails the following tests of soundness:</p> <p>C2: The deposit draft LDP does not have regard to national; policy. Para 5.4.5 (bullet point 7) of Planning policy Wales (2012) states that the development plan should "<i>clarify how biodiversity will be safeguarded outside statutory designated sites without unduly restricting development that is otherwise appropriate</i>".</p> <p>In failing to address the lapwing value of proposed allocation EC1/1, the local planning authority has failed to clarify how biodiversity outside statutorily-designated sites will be safeguarded.</p> <p>Furthermore, para 3.3.2 (bullet point 14) of TAN 5 states that local development plans should "<i>Make proposals for necessary new development in ways and at locations that are consistent with the nature conservation objectives and policies in the plan itself and with national planning policies</i>".</p> <p>The deposit draft LDP has proposed the allocation of EC1/1 in a way which is not consistent with the nature conservation objectives and polices in the plan itself, for example policy EN6, which addresses s42 species.</p> <p>CE2: The deposit draft LDP is not realistic. It is not founded on a robust evidence-base, because it does not address a key biodiversity resource which is of acknowledged concern, and which is a material consideration in development plan formulation.</p> <p>CE3: The deposit draft LDP fails test CE3, because there is no clear mechanism for implementing the protection of breeding lapwings in the context of the development of EC1/1.</p> <p><u>Changes Sought to the LDP :</u></p> <p>Insert a new paragraph between paras 5.2.9 and 5.2.10 which states that "<i>EC1/1 is nationally-important for breeding lapwings, and commits the local planning authority to producing, consulting upon and adopting supplementary planning guidance in the form of a Masterplan (the production of a Masterplan is already a LDP commitment), which will set out how compensatory measures with regard to breeding lapwings will be brought forward in respect of the Lapwing Compensation Site abutting Baglan Bay development area on the west</i>".</p> <p>PLEASE NOTE THAT THE ABOVE REPRESENTATION IN RESPECT OF EC1/1 ALSO APPLIES TO EC2/6.</p>
Dep1305		Associated British Ports	587221	Support	Existing Employment Areas	Policy EC 2	<p>We note that land under AB Ports ownership at Port Talbot Docks is safeguarded for employment (B1, B2 and B8) uses under Policies EC2 and EC3 (Employment Area Uses) of the Plan. Support is provided to these policies and in particular to EC2/10 which relates to the employment allocation at Llewellyn's Quay, Port Talbot and to the supporting paragraph 5.2.22 to Policy EC3 which indicates that a wider range of uses may be acceptable at existing employment areas.</p>
Dep740	Mr Phil Holmes	City & County of Swansea	196411	Object	Employment Area Uses	Policy EC 3	<p>CCOS request a refinement of the employment allocations and strategy to define more specifically the uses and business sectors that NPTCBC considers appropriate at the locations identified. This is particularly relevant in respect of B1 office uses, which the Council considers should be directed in the Plan towards in-centre locations in line with national planning guidance, and/or specific key business park locations that are orientated towards certain sectors. The Council has for example made clear its objections to a planning application submitted in 2013 to NPTCBC by the Welsh Government for a large quantum of speculative office floorspace at land adjacent to Amazon, in view of the potentially highly significant adverse impact such development would have on Swansea City Centre. The Peter Brett Study findings are clear that the regional economy has a certain level of</p>

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							realistic growth potential and that there is a maximum level of floorspace for office development that is required in order to deliver the required growth targets. It identifies that a key element of the spatial strategy in this context is to direct such development towards in-centre locations, and specifically Swansea City Centre, to support regeneration initiatives. This refinement is considered necessary not only to safeguard the interests of both NPTCBC and the City and County of Swansea but is also in the interests of supporting economic growth for the City Region.
Dep1307		Associated British Ports	587221	Support	Employment Area Uses	Policy EC 3	We note that land under AB Ports ownership at Port Talbot Docks is safeguarded for employment (B1, B2 and B8) uses under Policies EC2 and EC3 (Employment Area Uses) of the Plan. Support is provided to these policies and in particular to EC2/10 which relates to the employment allocation at Llewellyn's Quay, Port Talbot and to the supporting paragraph 5.2.22 to Policy EC3 which indicates that a wider range of uses may be acceptable at existing employment areas.
Dep431	Mr Edward James		449822	Object	Live-work Units	Policy EC 6	<p>Replace the words "immediately adjacent to" with "in close proximity".</p> <p>Representation on Policy SC1 and EC6</p> <p>Both policies state that they will help reinvigoration. Because they are limited to only sites on the settlement limit and they do not want 'bad neighbours' hardly any will be built (5 - 10 predicted).</p> <p>By changing the wording more sites would benefit including my site NV73 Land at Lon-y-Bryn, Glynneath.</p> <p>In the present form SC1 and EC6 are not logical and the development will not logically come from it. It is too inflexible.</p>
Dep491	Mr David Clifford Powell		456093	Object	Live-work Units	Policy EC 6	<ul style="list-style-type: none"> • 5.2.26 Employment Uses (4) 'Development would have no detrimental impact of neighbouring properties'. A business that makes no noise... A business that makes no smells... A business that does not do anything... <p>OR</p> <p>Remove the wording from 5.2.30 Policy EC6 (1) 'or immediately adjacent' and replace it with 'close proximity'. This will enable a potential 'bad neighbour' to deliver all that the plan states but the total inability of this policy in its present form to deliver any development, must be changed.</p>
Dep525	Mr David Eurof Davies		785451	Object	Live-work Units	Policy EC 6	<p>At present I believe that the policy EC6 wording is extremely restrictive, and a slight change to the policy wording will open the policy to a wider cross section of the community. To demonstrate how a change to the policy wording will achieve this, I will also submit a suggestion for an alternative site within the Valley Strategy Area, which currently does not meet the policy criteria as it stands - but which could yield more live work units with a slight change to the policy wording.</p> <p>Policy EC6 states that a site must lie within or immediately adjacent to the settlement limit, now this in itself could lead to a multitude of complaints by home owners who already reside within or immediately adjacent to the settlement limit. For example, a land owner with a plot of land located immediately adjacent to a housing settlement could possibly be granted permission to develop live work units - with the existing policy wording . These live work units could be used as "workshops", that may require the use of noisy machinery at any time during the day or night. Now this would undoubtedly cause disruption to the residents living in the properties, immediately adjacent to the proposed live work unit site.</p> <p>However, if the wording of policy EC6 was amended to state:</p> <p>Appropriate live-work units in the Valley Strategy Area will be permitted in accordance with the following criteria:</p> <ol style="list-style-type: none"> 1. The site lies within " reasonable proximity " to the settlement limit; and 2. The percentage split of floor space is no less than 60% work; and 3. The live-work floor space is adjoining the dwelling floor space; and 4. The business is carried out by an occupier of the premises; and 5. A business plan is submitted as part of the planning application process which demonstrates the proposed employment use is viable over the long term; and 6. The development would have no detrimental impact on the amenities of neighbouring properties, the environment or highway safety.

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							This would allow the policy to be used on a wider scale, and lead to the potential yield of more live work units that would be excluded due to the current restrictive policy wording.
Dep796	Mr Sean McHugh		588966	Support	The Undeveloped Coast	Policy EN 1	<p>Support Policy EN1 'The Undeveloped Coast' to protect the area from inappropriate development.</p> <p>The coastal strip of NPT contains priority dune habitat (now very scarce in Wales) and other important habitat mosaics which support a rich bird, plant and invertebrate assemblage (Ref: An invertebrate survey of Baglan Burrows in 2012 S.P. Bolchover 2013 CCW Contract Science Report No. 10280) . The remaining dunes, including Baglan Burrows are a fragment of the larger historical Glamorgan sand dune system and protection of the undeveloped coast together with opportunities for improving semi natural coastal habitats is welcomed.</p>
Dep642	Mr David Watkins	Natural Resources Wales	786443	Object	The Undeveloped Coast	Policy EN 1	<p>Paragraph 5.3.5. Policy EN1 The Undeveloped Coast</p> <p>Paragraph 5.7.2 of Planning Policy Wales (Edition 5) states that development plans should normally only propose coastal locations for development which needs to be on the coast. In particular, the undeveloped coast will rarely be the most appropriate location for development. Where new development requires a coastal location the developed coast will normally provide the best option, provided that due regard is paid to the risks of erosion flooding or land instability.</p> <p>To meet Test of Soundness C2, we therefore recommend that the policy is amended by inserting "<i>and cannot be accommodated on the developed coast,</i>" after "<i>... a coastal location is necessary</i>" .</p>
Dep279	Mr David Llewellyn	Bridgend County Borough Council	199968	Object	Special Landscape Areas	Policy EN 2	<p>Policy EN2 - Special Landscape Areas</p> <p>BCBC welcomes the inclusion of Special Landscape Areas in the Neath Port Talbot Deposit Plan. However, it would appear from an examination of the Proposals Map that there are several anomalies in the boundaries of SLAs across our local authority boundaries. This could however, be associated with the interpretation of using 'logical boundaries' for the SLAs which could differ between authorities.</p>
Dep648	Mr David Watkins	Natural Resources Wales	786443	Support	Special Landscape Areas	Policy EN 2	<p>Paragraph 5.3.8 Policy EN 2. Special Landscape Areas</p> <p>We support the inclusion of this policy which identifies and protects Special Landscape Areas.</p>
Dep280	Mr David Llewellyn	Bridgend County Borough Council	199968	Object	Green Wedges	Policy EN 3	<p>Policy EN3 - Green Wedges</p> <p>BCBC notes the identification of a Green Wedge around Margam to protect the coalescence of Port Talbot and Pyle in Bridgend County Borough. However BCBC would like to point out that no Green Wedge exists to the north / west of Pyle within Bridgend County Borough.</p>
Dep649	Mr David Watkins	Natural Resources Wales	786443	Support	Green Wedges	Policy EN 3	<p>Paragraph 5.3.15 Policy EN 3 Green Wedges</p> <p>We support this policy and welcome the opportunities for increased access to the countryside which they can offer to the population and the protection of local biodiversity in these areas.</p>
Dep650	Mr David Watkins	Natural Resources Wales	786443	Support	Replacement Dwellings in the Countryside	Policy EN 4	<p>Paragraph 5.3.20 Policy EN 4 Replacement Dwellings in the Countryside</p> <p>We support the inclusion of this policy.</p>
Dep651	Mr David Watkins	Natural Resources Wales	786443	Support	Conversion and Extension of Existing Buildings in the Countryside	Policy EN 5	<p>Paragraph 5.3.22 Policy EN 5 Conversion and Extension of Existing Buildings in the Countryside</p> <p>We support this policy and recommend that a design guide be developed to act as a guide and assist potential developers.</p>
Dep662	Mr David	Natural Resources Wales	786443	Object	Important Biodiversity and Geodiversity Sites	Policy EN 6	<p>Paragraph 5.3.31 Policy EN 6 Important Biodiversity and Geodiversity Sites</p>

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	Watkins						<p>We support the policy and consider that it meets Test of Soundness C2 and CE1. We also welcome the clarification in paragraph 5.3.34 that where harm to biodiversity sites is unavoidable, effective mitigation measures will be required to ensure that there is no reduction in the overall value of the area or feature.</p> <p>However, paragraph 5.4.6 of <i>Planning Policy Wales</i> (Edition 4, 2011) and 2.24 of <i>Local Development Plans Wales</i> (2005) specifies the need for natural heritage designations (of various types) to be clearly identified on the Plan's Proposals Maps.</p> <p>In line with national policy requirements, and to meet Test of Soundness C2 we therefore recommend that Regionally Important Geodiversity sites, Local Nature Reserves and Sites of Interest for Nature Conservation are clearly identified on the Proposals Map.</p>
Dep664	Mr David Watkins	Natural Resources Wales	786443	Object	Important Natural Features	Policy EN 7	<p>Paragraph 5.3.36 Policy EN 7 Important Natural Features</p> <p>We welcome this policy as the advocating the protection of biodiversity corridors and habitats in proposed development and also the clarification it provides, as the Plan currently does not clarify how development proposals which might have an adverse impact on protected species will be assessed. We consider this to be a gap in the coverage of the Plan. Further, paragraph 3.3.2 of <i>Technical Advice Note 5: Nature Conservation and Planning</i> (2009) should "give local expression to the protection and, where possible enhancement of species and their habitats, especially those with legal protection."</p> <p>To meet Test of Soundness CE1 and C2, we therefore recommend that the supporting text to Policy EN7 should clarify that proposals which might have an impact on protected species will need to comply with relevant national planning policy as set out in <i>Planning Policy Wales</i> , and <i>Technical Advice Note 5: Nature Conservation and Planning</i> .</p>
Dep666	Mr David Watkins	Natural Resources Wales	786443	Object	Pollution and Land Stability	Policy EN 8	<p>Paragraph 5.3.41 Policy EN8 Pollution and Land Stability</p> <p>We welcome the sentiments of this policy but there is a clear contradiction between the 2 parts of the policy. The first part states if there are adverse health effects the development " <i>will not be permitted</i> ". However in the second part of the policy it advocates that if new development creates new problems or exacerbates existing problems - mitigation could be a solution. There appears a contradiction in this policy which needs addressing.</p>
Dep670	Mr David Watkins	Natural Resources Wales	786443	Object	Developments in the Central Port Talbot Area	Policy EN 9	<p>Paragraph 5.3.51 Policy EN 9 Developments in Central Port Talbot</p> <p>We note that this area specific policy advocates a Construction Management Plan for proposed development in central Port Talbot and in particular the proposed Harbourside Strategic Regeneration Area. It is essential that this Policy and actions assess the range of potential risks that would affect the local environment and consequently develop effective and robust mitigation schemes. The policy is specifically designed to protect the integrity of the nearby Port Talbot Air Quality Management Area and we would support a robust Construction Management Plan in this location for that very purpose. You state that a SPG will be indicate your requirements in this matter and we would strongly advise that you liaise with us to ensure the integrity and practicality of such a document.</p>
Dep671	Mr David Watkins	Natural Resources Wales	786443	Support	Quiet Areas	Policy EN 10	<p>Paragraph 5.3.35 Policy EN10 Quiet Areas</p> <p>We support the inclusion of this policy.</p>
Dep276	Mr David Llewellyn	Bridgend County Borough Council	199968	Support	Gypsy and Traveller Site	Policy GT 1	<p>Policy GT1 - Gypsy and Traveller Site</p> <p>BCBC welcomes the proposal to accommodate 11 Gypsy and Traveller pitches at Caegarw Farm near Margam Village. In implementing this proposal consideration should also be given to the need for social infrastructure (educational / health facilities) in the Bridgend County Borough area which the occupants of the existing site currently use. Growth in this site will inevitably lead to further increases in the use of existing, and potentially the need for new, social and community facilities in the Pyle / North Cornelly area and these issues should be considered jointly in more detail at the site implementation stage.</p>
Dep763	Mr	Welsh Government	211935	Object	Gypsy and Traveller	Policy	Local authorities have a statutory duty under sections 225 and 226 of the Housing Act 2004 to consider the needs of Gypsies and

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	Mark Newey				Site	GT 1	Travellers. The LDP states that there is an overall need for 20 additional pitches over the LDP period. Provision is made for an additional 11 pitches up to the year 2022. This is not in line with national planning policy which states "where there is an assessment of unmet need for Gypsy and Traveller accommodation in the area, local planning authorities should allocate sufficient sites in LDPs to ensure that the identified pitch requirements for residential and transit use can be met." (WG Circular 30/2007, paragraph 17). The LDP should make provision to meet the identified need of 20 pitches over the full plan period to 2026.
Dep620	Mr David Watkins	Natural Resources Wales	786443	Object	Gypsy and Traveller Site	Policy GT 1	Paragraph 5.1.43 Policy GT 1 Gypsy and Traveller Sites We note that it is intended to provide 11 new pitches at this site. We just draw your attention to the presence of a waterbody to the east of the site which we suggest needs to be considered in the new site layout to avoid any potential flood risk or surface water drainage problems to individual pitches.
Dep777	Mr Mark Newey	Welsh Government	211935	Object	Proposals for New Gypsy and Traveller Sites	Policy GT 2	Welsh Government Circular 30/2007 'Planning for Gypsy and Traveller Caravan Sites' requires that criteria based policies be fair, reasonable, realistic and effective in delivering sites, and that policies should not rule out or place undue constraints on the development of sites (paragraph 25). The following criteria of Policy GT2 appear overly restrictive: <ul style="list-style-type: none"> • The use of the phrase 'will only be permitted where all the following criteria, where relevant, are satisfied' and should be amended. • Criterion 1 - is not inline with the freedom of choice to make individual private Gypsy and Caravan site provision (WG Circular 30/2007, paragraph 5). Sites may be on the outskirts of built up areas as well as in rural & semi rural settings (WG Circular 30/2007, paragraph 26). • Criterion 2 - the term 'reasonable' should be clarified in the policy's reasoned justification. • Criterion 3 - The requirement for 'good standard' goes beyond the WG Circular 30/2007 (para 19) which requires "access to utilities including waste recovery and disposal services". • Criterion 4 - the requirement relating to amenity and the environment is very general given paragraph 6. Annex B, Circular 30/2007. 'Planning for Gypsy and Traveller Caravan Sites' (WG, November 2008) provides greater clarity on a more appropriate consideration, namely that new sites should not cause too much noise/disturbance to local people (page 14).
Dep173	W E Rowlands		350301	Object	Housing Sites	Policy H 1	With reference to the proposed three hundred houses to be built in Tonna. I understand no provision regarding access roads are being planned prior to the estate being built. May I suggest the road through Llantwit and up the hill leading to the proposed site would make the building project virtually impossible and if the lorries were to leave the A465 at Tonna they would still have to negotiate the hill and awkward turn into Park Street. The bus company finds both Park Street and Llantwit a terrible bottle-neck. Before this project is considered may I suggest an in depth study to the access to the proposed site it will save a lot of trouble in the long run, in theory 300 houses = 300 cars at least. Also three hundred houses does seem excessive when one sees empty houses that have been on the market for over a year in the Neath area.
Dep297		National Grid	200376	Object	Housing Sites	Policy H 1	<u>Electricity Transmission Routes</u> The following site is identified as being crossed by or in close proximity to National Grid's high voltage overhead power lines: Site ref: H1/18. Afan Lido and Land to the rear of Tywyn School, Sandfields. Crossed by VE line. National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing

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							<p>electricity transmission equipment when planning developments.</p> <p>National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>'A Sense of Place' is available from National Grid and can be viewed at: www.nationalgrid.com/uk/senseofplace.</p> <p>Further information regarding development near overhead lines and substations is available here: http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm</p> <p>Should this site be taken forward as a development site in the future, the developers should be made aware of the above issue.</p>
Dep299		National Grid	200376	Object	Housing Sites	Policy H 1	<p><u>Electricity Transmission Routes</u></p> <p>The following site is identified as being crossed by or in close proximity to National Grid's high voltage overhead power lines: Site ref: H1/LB/34. Glan Yr Afon (Phase 2), Ynysmeudwy, Pontardawe. 4YU line adjoins site boundary.</p> <p>National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.</p> <p>National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with</p>

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							<p>statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.</p> <p>National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.</p> <p>'A Sense of Place' is available from National Grid and can be viewed at: www.nationalgrid.com/uk/senseofplace.</p> <p>Further information regarding development near overhead lines and substations is available here:</p> <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/pdf/brochure.htm</p> <p>Should this site be taken forward as a development site in the future, the developers should be made aware of the above issue.</p>
Dep309		National Grid	200376	Object	Housing Sites	Policy H 1	<p><u>Gas Pipelines</u></p> <p>The following site is identified as being in close proximity to National Grid's high pressure gas pipeline:</p> <p>Site Ref: H1/1. Gorffwysfa Care Home, Bryncoch. Located in close proximity to FM02 pipeline.</p> <p>Our underground pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas transmission network. Hence we require that no permanent structures are built over or under pipelines or within the zone specified in the agreements, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.</p> <p>Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. This advice is provided by the HSE Planning Advice for Development near to Hazardous Installations (PADHI) process. The relevant HSE guidance can be accessed via the following link: http://www.hse.gov.uk/landuseplanning/padhi.pdf</p> <p>In order to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please also read the following guidance prepared by National Grid:</p> <ul style="list-style-type: none"> • Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties http://www.nationalgrid.com/NR/ronlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf • Gas Transmission Underground Pipelines - Guidance http://www.nationalgrid.com/NR/ronlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APGasGuidance_2_.pdf <p>Should this site be taken forward as a development site in the future, the developers should be made aware of the above issue.</p>
Dep239	Mr Paul		345444	Comment	Housing Sites	Policy H 1	<p>The housing development along the Goytre Road for 25 houses is in the plan and developments within the existing settlement area are given approval in the plan.</p>

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	Bulmer						
Dep212	Mr S Reeve		782831	Support	Housing Sites	Policy H 1	This consultee submitted one of the standard letters of objection to Leiros Park and crossed everything out and objected to its content. The writing captured is that written on the letter itself.
Dep272		Western Power Distribution	784203	Object	Housing Sites	Policy H 1	<p>Western Power Distribution may have a number of strategic electricity distribution circuits (which can operate at 132,000 Volts, 66,000 Volts and 33,000 Volts) in some of the areas being considered for development. These circuits may run both underground and as overhead lines (on either towers / pylons or wood poles).</p> <p>Generally, Western Power Distribution would expect developers of a site to pay to divert less strategic electricity circuits at 11,000 Volts (11kV) or below. This may include underground some 11kV and low voltage overhead lines as necessary.</p> <p>Western Power Distribution would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on Western Power Distribution to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on Western Power Distribution to operate an economic and efficient electricity distribution system. Assuming the required minimum statutory clearances can be maintained and WPD can access its pylons / poles, WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines, for example such as parking, estate roads, commercial uses or open space, within their immediate proximity. It is worth noting that any existing circuits crossing the proposed development areas in the document may run both overhead and underground. In any case WPD should be consulted on detail at an early stage and WPD are always keen to discuss larger sites with the local authorities at an early stage, so that constraints can be taken into account and sites planned in the most effective way.</p>
Dep432	Mr Phillip Trick		785223	Object	Housing Sites	Policy H 1	<p>Sites H1/24 and H1/LB/30</p> <p>My comment relates to the current piecemeal development of both Bryn Morgrug (phase 1) and Bryn Morgrug (phase 2). The combination of these developments has the potential to add 108 houses to this area of Alltwen currently severed by one minor access road (Lon Hir). The 2011 Census confirmed that the number of households with 2 or more cars has risen significantly over the past 10 years these developments have the potential to increase the traffic in this area by over 200 vehicles.</p> <p>Whilst I have no objection to the development of the industrial waste plant for housing, this shouldn't be carried out unless an additional access road is provided into the Dan y Graig area of Alltwen. Residents have constantly pressed for an alternative road entrance off either Graig Road or the A4067 below Lon Hir. Local planners have rejected this request based on the size of the individual planning applications and unless this LDP is amended and these small developments are allowed to continue to receive planning approval the access issue will remain.</p> <p>The H1/24 development is a new proposal although it corresponds to the Planning Application currently being determined by NPTCBC Planning department. It is the area including the old Mathews Skips waste disposal site.</p> <p>This current proposal does not include the WDA site which has also been the subject of a planning enquiry and possibly an application taking into account that ownership of this site is now with one of the housing development companies. If this were to be developed upon then the totality of the whole new site would rise to in excess of 150 houses.</p> <p>One of the critical points in this issue is that the whole area of Alltwen is served by one road, (Lon Hir) so technically the Dan Y Graig area of Alltwen is a Cul De Sac with legislation restricting the scale of development a fact constantly ignored by Neath Pot Talbot Planning authority. The alternative new road into the proposed development site should be included as an essential condition of any further development on the site. To that end the three potential sites for a sensible planning process should be regarded as one site.</p>

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							To this end I feel this proposal does not meet with SP20 paragraph 5.4.1 section 5, 6 and 7 requirements.
Dep727	Mr Mark Newey	Welsh Government	211935	Object	Housing Sites	Policy H 1	<p>Deliverability of Housing Sites</p> <p>Commitments</p> <p>There is a strong reliance upon housing sites which already benefit from planning permission (3,822 units, 42%) and the authority should demonstrate these are deliverable of over the plan period.</p> <p>A thorough assessment of deliverability is required to determine if there are other non-deliverable sites, resulting in a need to identify additional housing sites in order to meet the overall provision .</p>
Dep729	Mr Mark Newey	Welsh Government	211935	Object	Housing Sites	Policy H 1	There are a number of examples of housing sites included in Policy H1 'Housing Sites' whose deliverability is questioned. We note there are a number of discrepancies between the phasing dates included in the Implementation Plan and the JHLAS 2013 e.g. H1/LB/3 Elba Crescent is phased for delivery over the period 2014 - 2017, yet it is included as a category 3 (i) site in the JHLAS 2013 which is unlikely to come forward for development over the next five years.
Dep730	Mr Mark Newey	Welsh Government	211935	Object	Housing Sites	Policy H 1	The Implementation Plan states that housing site H1/LB/13 Blaenbaglan Farm has extant planning permission dating back to the 1970s and 1980s. In the JHLAS 2013 the site is allocated for 219 units and included as a Category 3(i) site. The Implementation Plan however shows the site as being delivered in the period 2015 to 2024 for 260 units. It would appear that this site has no ability to be delivered over the plan period and should be deleted.
Dep787	Mr Ben Porte	Redrow Homes (South Wales) Ltd	461445	Support	Housing Sites	Policy H 1	<p>Proposed Allocation at Bryn Morgrug, Phase 2 - Site Reference No. H1/24</p> <p>It is noted that the site at Bryn Morgrug (Phase 2), which is located within Alltwen, Pontardawe, is proposed for allocation within the Deposit Plan for residential development. The site is identified within Policy H1 Housing Sites, with the site reference H1/24. The site is estimated to provide for 52 units.</p> <p>Support is given to the proposed allocation of the site, as this correctly recognises that the site provides an appropriate, suitable and deliverable development site, in a sustainable location, which can provide for residential development, and which will assist in meeting NPT's defined housing needs and the aspirations for growth in the area.</p> <p>The appropriateness of the site at Bryn Morgrug Phase 2 (H1/24) has been confirmed through detailed dialogue with Neath Port Talbot Council regarding an existing planning application, submitted on behalf of Redrow Homes Ltd, which is currently being considered for the site.</p> <p>The application (reference number P2012/1116) was registered by Neath Port Talbot County Borough Council (NPTCBC) on 19th December 2012, and is currently undetermined by the Council. The description of development is as follows:</p> <p><i>"Application for demolition of existing scrap metal yard / buildings and adjacent dwelling / ancillary outbuildings, and construction of 51 dwellings including access, drainage and associated works" .</i></p> <p>A copy of the current layout plan is provided at Attachment A to this letter. The application was also supported by a number of detailed reports / assessments, which included the following:</p> <ul style="list-style-type: none"> • Design and Access Statement; • Planning Statement; • Welsh Language and Culture Impact Assessment; • Transport Statement; • Travel Plan Framework; • Landscape and Visual Impact Assessment; • Ecological Assessment;

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							<ul style="list-style-type: none"> • Tree Survey; • Ground Conditions Desk Study Report; • Code for Sustainable Homes Pre-Assessment; • Archaeological Desk-Based Assessment; • Foul Water and Surface Drainage Strategy Report; and • Various Application Plans. <p>If copies of the any of the above documents would assist, then please do let us know and we can provide copies of these.</p> <p>During the course of the current application, a number of material considerations have been considered by NPTCBC. In terms of the technical details, the position reached with NPTCBC in terms of all of the key matters is confirmed to be as follows:</p> <ul style="list-style-type: none"> • Landscape and Visual Amenity : Matter resolved and considered acceptable by NPT. • Highways : Matter resolved through detailed dialogue with NPTCBC Highways and therefore this has been confirmed to be acceptable by NPT. • Ground Conditions : No objection raised subject to defined conditions. Accordingly this matter is resolved. • Trees : NPTCBC's Arboricultural Officer has confirmed that they have no objection to the proposal, and the application should be allowed to proceed as per the submitted tree survey. • Flood Risk and Drainage : Responses received from the EA (NRW) confirming that they have no objection to the proposal, subject to defined conditions. This matter is therefore resolved. • Sewerage / Water Supply : Response received from the DCWW confirming that they have no objection to the proposal, subject to outlined conditions. This matter is therefore resolved. • Viability : Matters have been agreed / resolved and are considered to be acceptable by NPT. • Design, Siting and Layout : This has been discussed and negotiated at length with NPT and is now considered to be acceptable by Officers. • Ecology : Detailed dialogue has been had with NRW in relation to ecology. NRW have now confirmed that they have no objection to the proposal, subject to a number of conditions. <p>The above therefore demonstrates that the proposal has been subject to a thorough assessment, and that the scheme has been confirmed to be acceptable in all technical respects.</p> <p>Accordingly, it is confirmed that the proposed site is acceptable and deliverable on all technical grounds to provide for residential development, and there are no constraints or impediments to bringing forward the site. The allocation of the site within the NPT LDP is therefore confirmed to be suitable and appropriate.</p> <p>Furthermore, it should be noted that on the adjacent site, Bryn Morgrug Phase 1 (site reference H1/LB/30), which is located to the south, Redrow Homes Limited secured full planning permission for the construction of 57 dwellings on 19th July 2012 (planning application ref. P2011/0758). This site is currently being developed, which demonstrates the applicant's track record in delivering sites within this area.</p> <p>Summary</p> <p>Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters.</p> <p>These representations provide our support for the proposed allocation at Bryn Morgrug Phase 2 (H1/24), as it has been demonstrated that the site is suitable to provide for residential development. We therefore respectfully urge, that the proposed allocation is maintained within the LDP.</p>
Dep610	Mr David	Natural Resources Wales	786443	Object	Housing Sites	Policy H 1	Paragraph 5.1.10 Policy H 1 Housing Sites

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	Watkins						<p>We note and welcome that earlier comments submitted by Natural Resources Wales, the former Countryside Council for Wales, and the former Environment Agency Wales at 'Candidate Sites' consultations have been recognised and addressed in the 'LDP Strategic Housing Site Assessment Report (August 2013). This Report therefore highlights the environmental considerations relevant to each allocation, which should be taken into account in any application for planning permission at those sites.</p> <p>Your authority has been in receipt of our comments in respect of potential development housing sites and we notice that several sites that may be subject to potential flood risk remain within your schedule and potentially require further detailed assessment.</p> <p>H1/17 Harbourside</p> <p>H1/LB/18 Copperminers</p> <p>CwmafanH1/23 Park Avenue, Glynneath</p> <p>H1/LB/36-37 Graig Newydd</p> <p>We ask that the information contained in this Housing Site Assessment Report is included as an Annex to the LDP to enable potential developers to have clarity on; any environmental considerations relevant to an allocation, and where environmental assessments (e.g. Habitats Regulations Assessment) will need to be undertaken.</p>
Dep611	Mr David Watkins	Natural Resources Wales	786443	Object	Housing Sites	Policy H 1	<p>Paragraph 5.1.10 Policy H 1 Housing Sites</p> <p>We note and welcome that earlier comments submitted by Natural Resources Wales, the former Countryside Council for Wales, and the former Environment Agency Wales at 'Candidate Sites' consultations have been recognised and addressed in the 'LDP Strategic Housing Site Assessment Report (August 2013). This Report therefore highlights the environmental considerations relevant to each allocation, which should be taken into account in any application for planning permission at those sites.</p> <p>Your authority has been in receipt of our comments in respect of potential development housing sites and we notice that several sites that may be subject to potential flood risk remain within your schedule and potentially require further detailed assessment.</p> <p>H1/17 Harbourside. H1/LB/18 Copperminers, Cwmafan. H1/23 Park Avenue, Glynneath. H1/LB/36-37 Graig Newydd.</p> <p>We ask that the information contained in this Housing Site Assessment Report is included as an Annex to the LDP to enable potential developers to have clarity on; any environmental considerations relevant to an allocation, and where environmental assessments (e.g. Habitats Regulations Assessment) will need to be undertaken.</p>
Dep612	Mr David Watkins	Natural Resources Wales	786443	Object	Housing Sites	Policy H 1	<p>Paragraph 5.1.10 Policy H 1 Housing Sites</p> <p>We note and welcome that earlier comments submitted by Natural Resources Wales, the former Countryside Council for Wales, and the former Environment Agency Wales at 'Candidate Sites' consultations have been recognised and addressed in the 'LDP Strategic Housing Site Assessment Report (August 2013). This Report therefore highlights the environmental considerations relevant to each allocation, which should be taken into account in any application for planning permission at those sites.</p> <p>Your authority has been in receipt of our comments in respect of potential development housing sites and we notice that several sites that may be subject to potential flood risk remain within your schedule and potentially require further detailed assessment.</p> <p>H1/17 Harbourside. H1/LB/18 Copperminers, Cwmafan. H1/23 Park Avenue, Glynneath.</p>

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							H1/LB/36-37 Graig Newydd. We ask that the information contained in this Housing Site Assessment Report is included as an Annex to the LDP to enable potential developers to have clarity on; any environmental considerations relevant to an allocation, and where environmental assessments (e.g. Habitats Regulations Assessment) will need to be undertaken.
Dep613	Mr David Watkins	Natural Resources Wales	786443	Object	Housing Sites	Policy H 1	Paragraph 5.1.10 Policy H 1 Housing Sites We note and welcome that earlier comments submitted by Natural Resources Wales, the former Countryside Council for Wales, and the former Environment Agency Wales at 'Candidate Sites' consultations have been recognised and addressed in the 'LDP Strategic Housing Site Assessment Report (August 2013). This Report therefore highlights the environmental considerations relevant to each allocation, which should be taken into account in any application for planning permission at those sites. Your authority has been in receipt of our comments in respect of potential development housing sites and we notice that several sites that may be subject to potential flood risk remain within your schedule and potentially require further detailed assessment. H1/17 Harbourside. H1/LB/18 Copperminers, Cwmafan. H1/23 Park Avenue, Glynneath. H1/LB/36-37 Graig Newydd. We ask that the information contained in this Housing Site Assessment Report is included as an Annex to the LDP to enable potential developers to have clarity on; any environmental considerations relevant to an allocation, and where environmental assessments (e.g. Habitats Regulations Assessment) will need to be undertaken.
Dep614	Mr David Watkins	Natural Resources Wales	786443	Object	Housing Sites	Policy H 1	Paragraph 5.1.10 Policy H 1 Housing Sites We note and welcome that earlier comments submitted by Natural Resources Wales, the former Countryside Council for Wales, and the former Environment Agency Wales at 'Candidate Sites' consultations have been recognised and addressed in the 'LDP Strategic Housing Site Assessment Report (August 2013). This Report therefore highlights the environmental considerations relevant to each allocation, which should be taken into account in any application for planning permission at those sites. Your authority has been in receipt of our comments in respect of potential development housing sites and we notice that several sites that may be subject to potential flood risk remain within your schedule and potentially require further detailed assessment. H1/17 Harbourside. H1/LB/18 Copperminers, Cwmafan. H1/23 Park Avenue, Glynneath. H1/LB/36-37 Graig Newydd. We ask that the information contained in this Housing Site Assessment Report is included as an Annex to the LDP to enable potential developers to have clarity on; any environmental considerations relevant to an allocation, and where environmental assessments (e.g. Habitats Regulations Assessment) will need to be undertaken.
Dep1267	Mrs Deborah Phillips	Pontardawe Town Council	196356	Object	Housing Sites	Policy H 1	The Town Council reviewed the proposal to increase the residential dwellings at Rhyd y Fro but were surprised due to the areas lack of effective public transport. With regard to the proposed development of additional residential housing in Rhyd y Fro, the Town Council would also like to bring the County Borough's attention the current problems with sewerage and drainage already being insufficient for the level of housing in this area and that substantial additional capacity along the entire main system would be required should the number of houses in that area be increased.
Dep865		Coombe Tennant	457946	Support	Housing Sites	Policy H	We refer to the attached supporting documentation and studies in respect of the proposed housing land allocation at Crymlyn

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		Estate Co. Ltd.				1	<p>Grove (Phase 3) - H1/9.</p> <p>Submission on behalf of Coombe Tennant Estates.</p> <p>1 INTRODUCTION</p> <p>1.1 This statement comprises Asbri Planning Ltd's response to the Neath Port Talbot Deposit Local Development Plan on behalf of Coombe Tennant Estates who own land which is subject to the proposed Housing Land allocation at Crymlyn Grove, (Phase 3), Skewen (H1/9).</p> <p>1.2 The land concerned was originally subject to a Candidate Site request when submissions were invited by the Council between February and July 2009 - Reference (N109). Land at Pen Twyn Farm. We previously submitted representations at the Emerging Deposit Plan stage and are therefore pleased to note that the site is confirmed as a proposed housing land allocation for 150 dwellings - H1/9 as 'Crymlyn Grove, Phase 3', and that the adjacent site, currently an adopted Unitary Development Plan allocation (H1/15 - Crymlyn Parc, Skewen) is retained as H1/8 'Crymlyn Grove Phase 2'.</p> <p>1.3 This Submission document, therefore, accompanies the required Deposit Plan Forms. The overall Soundness of the Plan is supported in terms of the Site Assessment process carried out and the proposed Plan policies. We are submitting additional supporting information in the form of a Strategic Landscape and Visual Assessment, and Phase 1 Extended Habitat Survey.</p> <p>1.4 These representations also seek to emphasise that the development of the site is compatible with the LDP's sustainability objectives and is deliverable. As such comments on, and amendments to, the Council's Site Detailed Site Assessment, incorporated in the LDP Strategic Housing Assessment Report, are included.</p> <p>1.5 This Statement is structured as follows.</p> <ul style="list-style-type: none"> • In Section Two, we provide a description of the site subject to these representations; • In Section Three we comment on the Deposit Plan; • In Section Four we describe the Supporting Information Submitted; • In Section Five we provide comments on the Detailed Site Assessment on the basis of information submitted; • Our Conclusions are recorded in Section Six. <p>2 DESCRIPTION OF THE SITE</p> <p>2.1 The roughly rectangular shaped site measures 4.1 hectares of net developable area and consists of three field parcels, to the east of Pen-Twyn Farm. To the north an area of disused railway land separates the site from the Swansea to Neath railway line and M4 Motorway. The southern boundary lies adjacent to residential properties at Crymlyn Gardens. To the east lies land which is within a current UDP allocation - H1/45, and is now proposed as Phase 2, for 70 dwellings - H1/8.</p> <p>2.2 The farmhouse and industrial scale buildings associated with Pen-Twyn Farm lie to the west beyond a field parcel which was not included in the Candidate Site area. The farm complex is served by an access road which runs between the railway line to the west and the recent Barratt development at Crymlyn Gardens. The access emerges at the south-west corner of the Barratt development onto Crymlyn Road at a point where the road crosses the railway.</p> <p>2.3 A public footpath, enclosed by stone walls and fringed by trees, runs parallel with the southern boundary of the site, to the south of which, is the northern boundary of the Crymlyn Gardens development (UDP Housing allocation H1/9). This emerges onto the aforementioned access road south of the farmhouse.</p> <p>2.4 The site generally slopes downward gradually from south-east to north-west. The three field parcels are bounded by hedgerows, which extend east to the open area north of the existing housing area of Crymlyn Parc (Housing Land allocation - H1/45).</p>

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							<p>3 REPRESENTATIONS ON THE DEPOSIT PLAN</p> <p>3.1 Section 2 - The Strategy is supported, in particular the Area Based Objective OB7, i.e. <i>'Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.'</i></p> <p>3.2 Paragraph 2.5.19 places emphasis on the Coastal Corridor where the greatest concentration of housing and employment are focused. The settlement of Skewen, which is related to the greater Neath urban area, is included within this area.</p> <p>3.3 In terms of Overarching Policies in Section 3, Policy SP3 (Sustainable Communities) which includes Skewen as a 'District Centre' is acknowledged, as is Policy SC1 (Settlement Limits). The site being promoted is included within the settlement limits as identified on the Proposals Maps (Inset 28) and is consequently supported.</p> <p>3.4 Section 4 - Area Based Policies makes provision for Development in the Coastal Corridor Strategy Area under Policy SP5 and the inclusion of the site under Policy H1 in Section 5 - Topic Based Policies (H1/9 Crymlyn Grove - Phase 3, Skewen - 150 units, 5.6 hectares) is wholeheartedly supported.</p> <p>4 SUPPORTING INFORMATION SUBMITTED</p> <p>4.1 As stated in the introduction, supporting evidence is submitted with these representations which will inform a future planning application and which will be of assistance to the Council in defending the allocation at future Examination proceedings. Additional evidence which accompanies these submissions is summarised below.</p> <p>4.2 Strategic Landscape and Visual Statement (Soltys Brewster) A Baseline Landscape and Visual assessment has been carried out of the likely landscape and visual effects of housing development on the allocated site. This is included in Appendix 3. The site is described as being visually well contained by rising topography to the north, local woodland blocks, adjacent housing development to the south, and the farm buildings to the west. There are no views of the site from the M4 motorway due to the screening effect of adjacent vegetation. The site therefore has a strong sense of enclosure.</p> <p>4.3 There are partial, more extensive, views to the east, over Skewen, towards the Neath Valley and to the west towards the fringes of Swansea although these are not considered to be expansive or significant in landscape and visual terms.</p> <p>4.4 The landscape character along the M4 where the site is located is dominated by urban fringe residential and industrial development within the wider, well wooded valley setting. The addition of housing at the site is in keeping with this character and would not significantly affect the landscape or visual qualities locally.</p> <p>4.6 The site would therefore assist with the integration of the existing urban grain that is present on the western fringes of Skewen. Given the above considerations, this appraisal indicates that residential development within the allocated site is likely to be acceptable in landscape and visual terms.</p> <p>4.7 Ecology (Soltys Brewster) The Phase 1 Habitat Survey undertaken by Soltys Brewster (included in Appendix 3) confirms that the site is of limited ecological value, being dominated by improved and poor semi-improved grassland. The stone-faced earth banks topped with trees and scrub around the field boundaries were considered of some value and it is recommended that these are retained and protected as far practicable.</p> <p>4.8 Evidence of Badgers was recorded at the site and as such it is recommended that any future development should seek to maintain the existing Badger pathways and areas for foraging Badgers as far as practicable. Further survey may be required in the dense scrub to the north of the site to establish whether a sett is present within 30m of the site boundary. If any setts falls within 30m of an area to be developed and is considered likely to be disturbed or damaged through the development works then a Badger development licence would be required.</p>

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							<p>4.9 Reptiles would also be a consideration in the poor semi-improved grassland along the southern boundary of the site - both Slow Worm and Common Lizard have been recorded in close proximity to the site. As such any future development in this area would require the production of a reptile mitigation strategy.</p> <p>4.10 Himalayan Balsam was also recorded on site and careful consideration of site hydrology and drainage would be required to ensure no adverse impact on the Crymlyn Bog SAC/ SSSI.</p> <p>4.11 The following Section, in referring to the Detailed Site Assessment includes some suggested revisions in order to incorporate the findings of the additional study information.</p> <p>5 COMMENTS ON DETAILED SITE ASSESSMENT</p> <p>5.1 We note the content of the LDP Strategic Housing Site Assessment Report (August 2013), including the Detailed Site Assessment provided in Table A.6. Below we suggest revisions based on the results of the study information prepared. These are discussed under the headings in the schedule.</p> <p>5.2 Strategy We generally support the findings of the assessment. The statement to the effect that the development would <i>help sustain the population of the town and district centres, spread growth and provide the population likely to support their facilities and services</i> , should perhaps be expanded to refer to the Skewen District Centre specifically in terms of maintaining its viability.</p> <p>5.3 Landscape The Strategic Landscape and Visual Statement submitted confirms that the site can be developed without undue detriments to local landscape qualities and the integrity of the green wedge at this location will not be undermined. The Assessment, however, states that the site is visible from the M4 motorway whereas the above Statement confirms that the existing vegetation effectively screens the site from the M4.</p> <p>5.4 Environmental Impacts The Phase 1 Habitat Survey undertaken by Soltys Brewster confirms that the site is of limited ecological value, being dominated by improved and poor semi-improved grassland. It is acknowledged that land to the north, which is excluded from the site allocation may have greater biodiversity value.</p> <p>5.5 A revised assessment may need to acknowledge the results of the survey, where it is recommended that any future development should seek to maintain the existing Badger pathways and areas for foraging Badgers as far as practicable. Further survey work may be required in the dense scrub to the north of the site to establish whether a Badger sett is present within 30m of the site boundary. Any future development in this area would also require the production of a reptile mitigation strategy. Himalayan Balsam was also recorded on site and careful consideration of site hydrology and drainage would be required to ensure no adverse impact on the Crymlyn Bog SAC/ SSSI.</p> <p>5.6 Highways The Highway Authority is satisfied and that there are no transport issues which would prevent the development of the site for housing. It is understood that the Transport Assessment referred to was commissioned by Barratt Homes for the planning application on Phase 2 and made an allowance for an additional 150 dwellings on subsequent phases.</p> <p>5.7 Infrastructure We concur with all the Council's findings under this heading.</p> <p>5.8 Deliverability and Viability As highlighted in this Section, the site is owned by Coombe Tennant Estates. The Estates company are supportive of the development, and house builder interest exists.</p>

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							<p>5.9 It is, therefore, apparent from all the factors discussed above that that the site is suitable as a housing land release, and its inclusion, within the revised settlement boundary and as a housing land allocation, in the Deposit Local Development Plan is based on a sound assessment by the Neath Port Talbot planners.</p> <p>6 CONCLUSION</p> <p>6.1 This Statement is submitted as a response to the Neath Port Talbot Deposit Local Development Plan, on behalf of Coombe Tennant Estates, who own land to the east of Pentwyn Farm Skewen which is proposed to be allocated for 150 units under Policy H1/9 (Crymlyn Grove Phase 3).</p> <p>6.2 In promoting the development of the site we support the housing land allocation. We therefore wish to make representations in support and also submit additional evidence, which will inform a future planning application and which will be of assistance to the Council in defending the allocation at future Examination proceedings. The information comprises:</p> <ul style="list-style-type: none"> • A Phase 1 Habitat Survey prepared by Soltys Brewster. • A Landscape and Visual Assessment prepared by Soltys Brewster. <p>6.3 The representations also seek to demonstrate that the development of the site is compatible with the LDP's sustainability objectives and is deliverable. As such we comment on, and suggest revisions to, the Council's detailed site assessment as included in the LDP Strategic Housing Assessment Report.</p> <p>6.4 We are therefore grateful to the Officers and Members of Neath Port Talbot County Borough Council in allocating the site. We would welcome a meeting in the near future to discuss the timing of a future planning application.</p>
Dep882	Mr Christopher Jones	Persimmon Homes West Wales	786568	Support	Housing Sites	Policy H 1	<p>1 INTRODUCTION</p> <p>1.1 This statement comprises Asbri Planning Ltd's response to the Neath Port Talbot Deposit Local Development Plan (LDP) on behalf of Persimmon Homes West Wales who have a legal interest in part of the proposed Housing Land allocation (LDP Site Ref H1/28) at Bryn Brych Farm, Rhos, Pontardawe, and in future propose to develop the remainder of the site.</p> <p>1.2 The land concerned was originally subject to a Candidate Site submission when submissions were invited by the Council between February and July 2009 - Reference P 9. The site in question was proposed to be allocated in the earlier Stakeholder Version of the Deposit Plan, for 150 dwellings - under Reference H1/31. It was noted that the proposed allocation extended the original candidate site submission to include additional land around the Bryn Brych farm buildings. A Transport Assessment was submitted informally subsequent to this identification of this allocation in the Stakeholder Version of the Deposit Plan in order to confirm to elected Members and NPT Highway Officers that the site could be suitably accessed from the highway network. We are therefore using this opportunity to formally submit the Transport Assessment.</p> <p>1.3 This submission document accompanies the duly completed required Deposit Plan Forms. The overall Soundness of the Plan is supported in terms of the Site Assessment process carried out and the proposed Plan policies. We are submitting additional supporting information in the form of a Landscape and Visual Appraisal, Phase 1 Extended Habitat Survey, and Draft Concept Layout together with the re-submission of the Transport Assessment. These refer to the anticipated first phase of development for 80 or so units.</p> <p>1.4 These representations also seek to emphasise that the development of the site is compatible with the LDP's sustainability objectives and is deliverable. As such suggested amendments to the Council's Detailed Site Assessment, incorporated in the LDP Strategic Housing Assessment Report, are included.</p> <p>1.5 This Statement is structured as follows.</p>

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							<ul style="list-style-type: none"> • In Section Two, we provide a description of the site subject to these representations; • In Section Three we comment on the Deposit Plan; • In Section Four we describe the Supporting Information Submitted; • In Section Five we provide comments on the Detailed Site Assessment on the basis of information submitted; • Our Conclusions are recorded in Section Six. <p>2 DESCRIPTION OF THE SITE</p> <p>2.1 The whole site allocation is some 6 hectares in area and lies in the settlement of Rhos, some 2 kilometres east of Pontardawe and 5 kilometres to the north of Neath. The site is located directly north of the A474 Neath Road on gently rising land opposite Rhos Primary School.</p> <p>2.2 These submissions concentrate on the land which is currently optioned by Persimmon Homes West Wales and which comprises a potential first phase of development at the site i.e. the parcel directly to the south of the farm buildings and the adjoining field immediately to the west. However, these submissions also support the allocation of the land as a whole as identified in the Deposit Plan under Site Reference H1/28 and should be considered on this basis.</p> <p>2.3 The first phase opportunity presented by the site therefore includes two main field parcels, separated by a hedgerow and individual trees. There is no footway on the northern side of Neath Road along the site frontage. The wider allocation as a whole also includes additional parcels to the west, north and east of the Bryn Brych Farm buildings. Otherwise the site is bounded by existing areas of housing at Maes Rhoslyn to the east and frontage development along Neath Road/New Road to the west.</p> <p>2.4 It is noted, and welcomed, that the Council considers the location of the site to be highly sustainable with facilities and services in Rhos being within walking distance of the site, including the primary school opposite.</p> <p>3 REPRESENTATIONS ON THE DEPOSIT PLAN</p> <p>3.1 Section 2 - The Strategy is supported, in particular the Area Based Objective OB6, i.e. <i>'Reinvigorate the Valley Areas and improve economic prospects recognising the role of Glynneath and Pontardawe in delivering sustainable growth.'</i></p> <p>3.2 Objective OB7, which seeks to <i>'Provide an adequate supply, mix type and tenure of housing within sustainable settlement to meet the needs of the projected population'</i> is also supported.</p> <p>3.3 The Development Strategy of the Plan identifies Pontardawe and the Upper Neath Valley as a Strategic Growth Area in the Valleys which will create a mechanism to co-ordinate investment and ensure that the benefits of growth and regeneration are shared more widely throughout the valley communities. This is also acknowledged and supported as it seeks to facilitate growth in the Pontardawe area.</p> <p>3.4 In the above context, Paragraph 2.5.3 identifies Pontardawe and Glynneath as the most sustainable settlements in the Valleys to focus development. Paragraph 2.5.38 confirms that the town of Pontardawe is the 3rd largest settlement in the County Borough and the largest settlement in the Valley areas. Paragraph 2.5.41 goes on to state that Pontardawe has the ability to accommodate demand for the additional elements of new housing development. In respect of the site being promoted the above is supported.</p> <p>3.5 In terms of Overarching Policies in Section 3, Policy SP3 (Sustainable Communities) which includes Rhos as a 'Small Local Centre' is acknowledged, as is Policy SC1 (Settlement Limits). The site being promoted is included within the settlement limits as identified on the Proposals Maps (Inset 17) and the policy and related proposals map are consequently supported.</p> <p>3.6 Section 4 - Area Based Policies makes provision for the site allocation in Table 4.1 under the <i>Pontardawe Strategic Growth Area</i> and is, therefore, wholeheartedly supported, as is the inclusion of the site under Policy H1 in Section 5 - Topic Based</p>

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							<p>Policies (H1/28 Bryn Brych Farm - 150 units, 6 hectares).</p> <p>4 SUPPORTING INFORMATION SUBMITTED</p> <p>4.1 As stated in the introduction, supporting evidence is submitted with these representations which is intended to inform a future planning application for residential development of the site. This supporting information also addresses the key development influences associated with the allocation of the site in the LDP and can be used as part of any future Examination proceedings in continued support of the site's allocation within the Plan. Additional evidence which accompanies these submissions is summarised below.</p> <p>4.2 Transport Assessment (Asbri Transport) Vehicular access to the proposed development is via a new access road on to A474 New Road, designed to adoptable standards in accordance with DMRB Volume 6, Section 2, Part 6, TD 42/95. The proposed access to the site includes footway provision along both sides of the carriageway, and it is anticipated that both pedestrians and cyclists will use the main vehicular access to the site. It is also anticipated that the development will include:</p> <ul style="list-style-type: none"> • The provision of a footway along the northern edge of the A474, fronting the allocation site; and, • An informal pedestrian crossing across the A474, which provides a direct connection to Rhos Primary School. <p>4.3 Capacity analysis indicates that the proposed development will have a minimal impact on the local highway network. Of the five junctions analysed, two junctions will operate over capacity during the peak periods analysed. However, both junctions operate above their theoretical capacity in the 'no development' scenarios, and the impact of development generated traffic is minimal. The increase in traffic flows (two-way) throughout the study area are less than the 5% threshold identified in Tan18.</p> <p>4.4 Landscape and Visual Appraisal (Amalgam Landscape) The proposed development site consists of a number of regular large gently sloping fields, divided by a diverse mix of hedgerows, scattered trees and linear woodland belts. The upland areas in the wider landscape are more open and exposed but are also dominated by substantial woodland and forestry plantations and are crossed by a network of public right of ways, minor roads and open access areas with associated expansive views.</p> <p>4.5 The proposed development site is within the Clydach Valley landscape character area, described as a gently undulating farmland area, divided by a mosaic of vegetation. It is recognised by the Natural Resources Wales (NRW) as being of medium sensitivity. The adjacent Pontardawe/Rhos landscape character area, dominated by the urban form, has a low sensitivity.</p> <p>4.6 Mitigation measures for the proposed development site will include retention of mature vegetation, where possible within the site, with the focus for retaining and improving the boundary vegetation to 'round' off the proposed development and create and enhance a strong boundary to the development and the settlement of Rhos. As a result, the proposed development will create a natural and logical boundary to the existing settlement, physically and visually related to the existing settlement pattern.</p> <p>4.7 In particular, the southern fringes of the proposed development will be particularly appropriate for residential development as a first phase of development of the overall allocation. Such development would appear to be part of the existing settlement of Rhos and would integrate well with the existing and surrounding landscape character and its setting. The proposed development will be designed and appear as part of the self-contained settlement of Rhos, both within close proximity and in long distance views from the surrounding elevated ridges and hills. Through sensitive design of development at the site, retention of dominant vegetation, including mature trees within and on the boundaries, there would be no significant change to the wider landscape character.</p> <p>4.8 The residential development of the site will be perceived and there will be a change in view, in particular for those receptors immediately adjacent to the proposed development. This will be perceived as a continuation of the settlement of Rhos. Although 'different' from existing, views will not be out of character with the surroundings. There would be no significant adverse effects</p>

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							<p>on surrounding visual amenity receptors and their views. Overall, it is considered that the site represents a logical extension to the settlement of Rhos and its inclusion as a housing allocation in the Neath Port Talbot LDP is fully supported in landscape and visual terms. This appraisal demonstrates that the identification of the site as such a housing allocation will enable a sustainable housing development to be delivered that is well related to the existing settlement pattern and will not adversely impact on the Green Wedge or landscape designations. Its allocation as housing site is, therefore, fully supported, with significant opportunities for mitigation and enhancement measures to be incorporated as part of any detailed planning application which will further enhance the site's suitability to accommodate the envisaged residential development.</p> <p>4.9 Ecology (Hawkeswood Ecology)</p> <p>A Phase 1 Habitat Survey was carried out by Hawkeswood Ecology in September 2013. The Survey has resulted in several recommendations and advises that there may be a requirement for a Hedgerow Regulations Assessment if hedgerows are to be removed. A further survey to ascertain the presence of badgers is also recommended.</p> <p>4.10 It is concluded, however, that the site is generally considered to be of low biodiversity value although the hedgerows and boundaries may support breeding birds and roosting bats. It is recommended that the hedgerows and dense woody scrub should be retained and enhanced to protect potential bat and dormice habitat and also maintain an area of the site in reasonable condition for breeding birds. There are however, no apparent ecological reasons to prevent the development of the site.</p> <p>4.11 Concept Layout</p> <p>The sketch layout prepared has built on the study information undertaken and seeks to demonstrate how a first phase development of approximately 80 units, comprising a potential mixture of house types and tenures, could be accommodated whilst addressing the findings of the ecological and landscape assessments. The Concept plan also illustrates how subsequent phases of development can be addressed in order to deliver the development of the overall allocated area.</p> <p>4.12 The following Section, in referring to the Detailed Site Assessment with suggested revisions in order to incorporate the findings of the additional study information.</p> <p>5 REVISED DETAILED SITE ASSESSMENT</p> <p>5.1 We note the content of the LDP Strategic Housing Site Assessment Report (August 2013), including the Detailed Site Assessment provided in Table D.1. Below we suggest revisions based on the results of the study information prepared. These are discussed under the headings in the schedule.</p> <p>5.2 Strategy</p> <p>We generally support the findings of the assessment. Under the section which relates to planning gain, we would also suggest that reference is made to the potential for the scheme to provide a footway along the site frontage together with provision for 'dropping off' and 'picking up' points for school buses and parents, with crossing facilities for the school opposite.</p> <p>5.3 Landscape</p> <p>The Landscape and Visual Impact Assessment submitted confirms that the site can be developed without undue detriments to local landscape qualities and the integrity of the green wedge at this location will not be undermined. The assessment states that the site represents a natural and logical extension within the settlement and it is physically, functionally and visually related to the existing settlement pattern.</p> <p>We recommend that additional text be included to the effect that: <i>The proposed development will be perceived as a continuation of the settlement. Although 'different' from existing, views will not be out of character with the surroundings. There would be no significant adverse effects on surrounding visual amenity receptors and their views.</i></p>

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							<p>5.4 Environmental Impacts The Phase 1 Habitat Survey undertaken confirms that the majority of the site is improved grassland of low ecological interest with the areas of potential biodiversity importance confined to the boundary vegetation. Retention of trees and hedgerows where possible and standard mitigation measures can be applied to offset any impact. As regards other issues, we also concur that, as a south facing slope, there is an opportunity to maximise passive solar gain.</p> <p>5.5 Highways The submitted Transport Assessment is referred to in the Assessment and confirms that the highway Authority is satisfied and that there are no transport issues which would prevent the development of the site for housing.</p> <p>We note elsewhere in the Assessment Report, however that there is reference to the potential need for a secondary access, corresponding with the existing access to the Bryn Brych Farm buildings. Notwithstanding that the submission is based on the first phase of development for some 80 units, our Transport consultants dispute the need for a secondary vehicular access. Such a route would create additional traffic flows along residential streets to the east.</p> <p>5.6 Infrastructure We concur with all the Council's findings under this heading. It is noted that Welsh Water has confirmed that Trebanos Waste Water Treatment Works can accommodate the foul flows from the proposed development. This confirmation is welcomed. Any future planning application for residential development of the site will be informed by a detailed drainage strategy to be undertaken in liaison with Welsh Water and the Local Authority which will consider both foul and surface water flows. It is considered that Sustainable Urban Drainage Systems can be incorporated as part of a detailed scheme design in order to address surface water disposal at the site. Initial discussions with drainage engineers at the Local Authority indicate that development of the site at Rhos Farm can be undertaken in a manner that can provide benefit to the wider area. Such benefits will be addressed in the detailed drainage scheme that will accompany any future planning application at the site.</p> <p>5.7 Deliverability and Viability It is stated that 'interest has been expressed by a national house builder'. This can be confirmed with a firm intention for Persimmon Homes to develop the first phase of the site and to submit a planning application at an appropriate stage in the remaining LDP process.</p> <p>5.8 It is, therefore, apparent from all the factors discussed above that that the site is suitable for housing delivery, and its inclusion, within the revised settlement boundary and as a housing land allocation, in the Deposit Local Development Plan is based on a sound assessment by the Neath Port Talbot planners.</p> <p>6 CONCLUSION</p> <p>6.1 This Statement is submitted as a response to the Neath Port Talbot Deposit Local Development Plan, on behalf of Persimmon Homes West Wales, who have acquired an interest in land at Bryn Brych Farm, Rhos, Pontardawe which would represent a 1st Phase of the development of 150 units under Policy H1/28.</p> <p>6.2 In promoting the development of the site we support the housing land allocation. We therefore wish to make representations in support of the site allocation and also submit additional evidence, which will inform a future planning application and which can also be used as part of any future Examination proceedings to support the site allocation. The information comprises:</p> <ul style="list-style-type: none"> • A Transport Assessment, prepared by Asbri Transport • A Phase 1 Habitat Survey prepared by Hawkeswood Ecology. • A Landscape and Visual Assessment prepared by Amalgam Landscape. • A First Phase Concept Layout Plan <p>6.3 The representations also seek to demonstrate that the development of the site is compatible with the LDP's sustainability objectives and is deliverable. As such we comment on, and suggest revisions to, the Council's detailed site assessment as included</p>

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Dep848	Sam Courtney	Barratt Homes	786570	Support	Housing Sites	Policy H 1	<p>1. INTRODUCTION</p> <p>1.1 This statement comprises Asbri Planning Ltd's response to the Neath Port Talbot Deposit Local Development Plan on behalf of Barratt Developments plc who have an involvement in the proposed Housing Land allocation at Fairyland Road, Tonna (H1/11).</p> <p>1.2 The land concerned was originally subject to a Candidate Site submission when submissions were invited by the Council between February and July 2009 - Reference (N35) Land at B4434 Neath Rd/Fairyland Rd, Tonna. The site in question was proposed to be allocated in the earlier Stakeholder Version of the Deposit Plan. A Transport Assessment was submitted informally subsequent to this in order to allay any concerns that local elected members and the NPT Highway Officers may have expressed on the impact on local junctions. We are therefore using this opportunity to formally submit the document.</p> <p>1.3 This Submission document, therefore, accompanies the required Deposit Plan Forms. The overall Soundness of the Plan is supported in terms of the Site Assessment process carried out and the proposed Plan policies. We are submitting additional supporting information in the form of a Landscape and Visual Appraisal, Phase 1 Extended Habitat Survey, and Draft Concept Layout.</p> <p>1.4 These representations also seek to emphasise that the development of the site is compatible with the LDP's sustainability objectives and is deliverable. As such comments on the Council's Site Detailed Site Assessment, incorporated in the LDP Strategic Housing Assessment Report, are included.</p> <p>1.5 This Statement is structured as follows.</p> <ul style="list-style-type: none"> • In Section Two, we provide a description of the site subject to these representations; • In Section Three we comment on the Deposit Plan; • In Section Four we describe the Supporting Information Submitted; • In Section Five we provide comments on the Detailed Site Assessment on the basis of information submitted; • Our Conclusions are recorded in Section Six. <p>2 DESCRIPTION OF THE SITE</p> <p>2.1 The site is 11.7 hectares in area and lies to the south of the village of Tonna. It consists of several field parcels surrounding Cefn Y Don Farm. The largest of the fields lies in a wedge between the B4434, Neath Road/Llantwit Road and Fairy Road, an unclassified road which serves outlying farms and dwellings on the southern side of the Neath Valley overlooking Tonna.</p> <p>2.2 The site lies some 1 kilometre south-west of the small local centre of Tonna, including Tonnau Primary School and other services. Neath town centre lies a similar distance to the south-west with Neath Railway station, approximately 1.5 kilometres distant.</p> <p>2.3 The land rises to the south and east. A triangular area at the junction of Neath Road/Fairyland Road is excluded from the allocation. To the south of Fairyland Road is a cemetery, and to the north of Neath Road is an area of open land and a petrol filling station. A recent housing development, Hunters Ridge, bounds the site to the north with the farm buildings adjacent, served by an access via Fairyland Road.</p> <p>3 REPRESENTATIONS ON THE DEPOSIT PLAN</p> <p>3.1 Section 2 - The Strategy is supported, in particular the Area Based Objective OB7, i.e. <i>'Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population.'</i></p> <p>3.2 Paragraph 2.5.19 places emphasis on the Coastal Corridor where the greatest concentration of housing and employment are</p>

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							<p>focused. The settlement of Tonna, which is related to the greater Neath urban area is included within this area.</p> <p>3.3 In terms of Overarching Policies in Section 3, Policy SP3 (Sustainable Communities) which includes Tonna as a ‘Small Local Centre’ is acknowledged, as is Policy SC1 (Settlement Limits). The site being promoted is included within the settlement limits as identified on the Proposals Maps (Inset 29) and is consequently supported.</p> <p>3.6 Section 4 - Area Based Policies makes provision for Development in the Coastal Corridor Strategy Area under Policy SP5 and is therefore wholeheartedly supported, as is the inclusion of the site under Policy H1 in Section 5 - Topic Based Policies (H1/11 Neath Road/Fairyland Road, Tonna - 300 units, 11.6 hectares).</p> <p>4 SUPPORTING INFORMATION SUBMITTED</p> <p>4.1 As stated in the introduction, supporting evidence is submitted with these representations which will inform a future planning application and which will be of assistance to the Council in defending the allocation at future Examination proceedings. Additional evidence which accompanies these submissions is summarised below.</p> <p>4.2 Transport Assessment (Asbri Transport) A Transport Assessment was carried out in February 2012 and was informally submitted to the Council in order to allay concerns expressed by local members that the development would have a major impact on junctions in the area. The findings are summarised as follows:</p> <ul style="list-style-type: none"> • As part of the development, it is proposed to construct two vehicular (and pedestrian) accesses to the site from the B4434 Neath Road. The exact location of the accesses will need to be determined in consultation with the local highway authority. • As agreed with the local highway authority, the vehicle trip generation rates for the proposed allocation (300 dwellings) have been obtained from the TRICS 2013 (a) trip generation database. • The junction capacity analysis indicates that the existing/ proposed transport network has sufficient capacity to accommodate the anticipated level of demand generated by both the committed developments and proposed development of 300 dwellings on land adjacent to Neath Road/Fairyland Road. • It is considered that the impact of the proposed development can be accommodated within the existing and proposed highway network, without significantly increasing queues and delays for existing road users. <p>4.3 Landscape and Visual Appraisal (Anthony Jellard Associates) A LVIA assessment has been carried out of the likely landscape and visual effects of housing development on the allocated site at Neath Road/Fairyland Road, Tonna in the draft Deposit Neath Port Talbot Local Development Plan. It has involved an examination of various data about the site, including historic maps, aerial photographs and planning background information. An inspection has been made of the site, looking at its present condition and at the potential development impacts.</p> <p>4.4 The triangle of open space near the junction of Neath Road and Fairyland Road will be retained and will significantly help in maintaining a sense of openness and separation between settlements as perceived by those using Neath Road. The development would retain the existing trees and hedgerows on site with only minor losses for access. The well vegetated feel on the edge of the Tonna settlement would be maintained. As viewed from the other side of the valley, there would be some reduction in the visible gap between settlements but this would be very much limited by the substantial boundary and intervening screening vegetation.</p> <p>4.5 A landscape strategy would substantially retain boundary planting and introduce new areas of planting within the development. The site would retain a strong green edge as seen from the surrounding land. A small number of residential properties adjacent to the site on the edges of Tonna would experience significant visual impacts. There are a few others which are affected in residential areas on higher ground on the north side of the Neath Valley, but effects here will be minor. Most of the housing in this part of the Neath Valley would be unaffected by development of the site. There are minor visual effects on a short section of public bridleway below Ivy Tower but otherwise the public footpath network is unaffected.</p>

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							<p>4.6 The overall conclusion is that the Allocated site at Tonna could be developed for housing with acceptable landscape and visual impacts.</p> <p>4.7 Ecology (Hawkeswood Ecology) A Phase 1 Habitat Survey was carried out in September/ October 2013 by Hawkeswood Ecology. This is included in Appendix 4 of this document. The Survey has resulted in several recommendations and advises that hedgerows should be retained where possible and there may be a requirement for a Hedgerow Regulations Assessment if hedgerows are to be removed. A further survey to ascertain the presence of roosting bats if mature trees are to be removed or if the existing farm buildings are to be modified or demolished is also recommended. Reptile surveys are also recommended in appropriate areas.</p> <p>4.8 It is concluded that the site holds habitats of moderate significance in a local context and has potential for supporting protected species. It is recommended that the hedgerows and semi-improved and marshy grassland areas should be retained and enhanced where feasible. Further surveys will be required to ascertain to what extent protected species are present and to consider what mitigation measures may be necessary.</p> <p>4.9 Concept Layout The sketch layout prepared has built on the study information undertaken and seeks to demonstrate how some 140 units with a potential mixture of house types and tenures could be accommodated as a first phase of the development in the western portion of the site.</p> <p>4.10 The following Section, in referring to the Detailed Site Assessment with suggested revisions in order to incorporate the findings of the additional study information.</p> <p>5 COMMENTS ON DETAILED SITE ASSESSMENT</p> <p>5.1 We note the content of the LDP Strategic Housing Site Assessment Report (August 2013), including the Detailed Site Assessment provided in Table A.14. Below we comment and suggest appropriate revisions based on the results of the study information prepared. These are discussed under the headings in the schedule.</p> <p>5.2 Strategy We generally support the findings of the assessment, particularly in the context that the development would help sustain the population of the urban area, spread growth and provide the population likely to support the town centre and the existing facilities in Tonna.</p> <p>5.3 Landscape The Landscape and Visual Impact Assessment submitted confirms that the site can be developed without undue detriments to local landscape qualities and the integrity of the green wedge at this location will not be undermined. The assessment states that the retention of the triangular area near the junction of Neath Road and Fairyland Road should be retained and would significantly help in retaining the sense of openness and separation between settlements.</p> <p>We recommend that additional text be included to refer to the submitted LVIA and amendments to the effect that: <i>"A landscape strategy would substantially retain boundary planting and introduce new areas of planting within the development. The site would retain a strong green edge as seen from the surrounding land. Most of the housing in this part of the Neath Valley would be unaffected by development of the site. There are minor visual effects on a short section of public bridleway below Ivy Tower but otherwise the public footpath network is unaffected. The overall conclusion is that the Allocated site at Tonna could be developed for housing with acceptable landscape and visual impacts."</i></p> <p>5.4 Environmental Impacts The Phase 1 Habitat Survey undertaken confirms that the site holds habitats of moderate significance in a local context and has</p>

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							<p>potential for supporting protected species. Further studies will be necessary as part of a future planning application. The Report, as with the Council's assessment considers that retention of hedges and boundary features should be retained to aid connectivity.</p> <p>5.5 Highways The submitted Transport Assessment is referred to in the Assessment and confirms that the Highway Authority is satisfied and that there are no transport issues which would prevent the development of the site for housing. However, localised issues regarding on-street parking and the harsh bend on the main road at Llantwit may need addressing. These aspects will be the subject of future discussions through the planning application process.</p> <p>5.6 Infrastructure We concur with all the Council's findings under this heading.</p> <p>5.7 Deliverability and Viability It is stated that 'there has been developer interest in the site'. This can be confirmed with a firm intention for Barratt Homes to develop the site and to submit a planning application at an appropriate stage in the remaining LDP process.</p> <p>5.8 It is, therefore, apparent from all the factors discussed above that that the site is suitable as a housing land release, and its inclusion, within the revised settlement boundary and as a housing land allocation, in the Deposit Local Development Plan is based on a sound assessment by the Neath Port Talbot planners.</p> <p>6 CONCLUSION</p> <p>6.1 This Statement is submitted as a response to the Neath Port Talbot Deposit Local Development Plan, on behalf of Barratt Developments plc, who are involved in land at Fairyland Road, Tonna which is proposed to be allocated for 300 units under Policy H1/11.</p> <p>6.2 In promoting the development of the site we support the housing land allocation. We therefore wish to make representations in support and also submit additional evidence, which will inform a future planning application and which will be of assistance to the Council in defending the allocation at future Examination proceedings. The information comprises:</p> <ul style="list-style-type: none"> • A Transport Assessment, prepared by Asbri Transport • A Phase 1 Habitat Survey prepared by Hawkeswood Ecology. • A Landscape and Visual Assessment prepared by Anthony Jellard Associates. • A First Phase Concept Layout Plan <p>6.3 The representations also seek to demonstrate that the development of the site is compatible with the LDP's sustainability objectives and is deliverable. As such we comment on, and suggest revisions to, the Council's detailed site assessment as included in the LDP Strategic Housing Assessment Report.</p>
Dep822	Mr M Cuddy	Cuddy Demolition & Dismantling Ltd.	787651	Support	Housing Sites	Policy H 1	<p>The allocation of land at Heol Y Glyn, Glynneath for the construction of 81 residential units is supported (i.e. specifically Housing Allocation H1/LB/27).</p> <p>It is set out within the Deposit LDP that the settlement of Glynneath forms the key settlement within the Upper Neath Valley Strategic Growth Area, within which development should be focussed.</p> <p>It is considered that the allocation of land at Heol Y Glyn, Glynneath, for a total 81 units will assist in terms of generating growth within the Glynneath, and enhancing the sustainability and attractiveness of the wider Upper Neath Valley. The allocation of land at Heol Y Glyn is therefore considered essential to the delivery of the LDP strategy.</p> <p>It is contended within other representations made to the plan (on behalf of Cuddy Demolition & Dismantling Limited) that a larger allocation of new housing is required within Glynneath, if the settlement is to perform as, and deliver the objectives</p>

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							<p>required by, a Strategic Growth Area. In this context, in regards to the site at Heol Y Glyn, it is essential that this allocation is delivered over the plan period.</p> <p>In regards to the above point, it is confirmed that the housing allocation at Heol Y Glyn is a fully deliverable allocation, which can be implemented over the early part of the plan period - thereby assisting in the delivery of regeneration in the Upper Neath Valley, as well as the delivery of housing land on a county-wide scale.</p>
Dep922	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Housing Sites	Policy H 1	<p>The DLDP allocates land at Purcell Avenue for residential development for an estimated 115 units under Policy H1/20. As shown on the DLDP Proposals Map, this site is located within the settlement limits for Baglan.</p> <p>The proposed settlement limits and allocation accords with the UDP, which acknowledged that UDP Policy BB1, which covered the whole of Baglan Bay, will be suitable in part for housing development. UDP Policy H1/35 suggests that the site could deliver 440 homes, however does not specifically indicate where housing is proposed within the site.</p> <p>The approach in the DLDP is supported and is an improvement to the current UDP position as it indicates certainty on the location and amount of housing development considered to be acceptable at Baglan Bay. The site allocation, in terms of location and estimated number of units reflects early site investigations and pre-application dialogue with the Council. SMDL intend on making a planning application for housing development on this site in October / November 2013.</p> <p>For the reasons set out above, the residential allocation proposed at Purcell Avenue (Policy H1/20) is appropriate and deliverable (and can be supported).</p>
Dep1103	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	Housing Sites	Policy H 1	<p>The enclosed report, 'Neath Port Talbot Local Development Plan, Representations: Coed Darcy, October 2013) provides detailed comments on Policy H1 (see section 5).</p> <p>In summary, the level of growth that the DLDP currently proposes feeds a series of new land allocations for housing under Policy H1 of the DLDP which are not needed and are therefore unsustainable. Section 5 of the enclosed report explains the potential consequences of the plan if it is left as it is in relation to the scale of allocations, market capacity and rates of growth in general, the new site allocations and the implications on sustainability.</p> <p>The enclosed report makes two recommendations in this respect:</p> <p>i) to remove a series of proposed allocations; and</p> <p>ii) If for any reason the plan retains the current level of growth or the allocations proposed, it should include specific provisions for phasing or the sequential release of the new sites.</p> <p>This representation specifically relates to recommendation ii) above. St. Modwen state that these should be stopped until existing allocations or commitments are exhausted especially where these include previously developed land or meet the plan's vision and its primary aims and objectives.</p> <p>Consequences of New Site Allocations</p> <p>The consequences of the level of growth that the DLDP currently proposes are serious and significant. This is because they feed a series of land allocations for new housing which could upset or confuse a still fragile and stretched market, jeopardise the delivery of key regeneration objectives and projects and lead to an uncontrolled and unsustainable level and pattern of growth. We are sure that these are not the intentions of either the plan or the Council (and go, in fact, to the desire to appease the WG). However, for the reasons described in this section, they could be the consequences of the plan if it is left as it is.</p> <p>The scale of allocations, market capacity and rates of growth</p> <p>The headline allocation figure for new housing is 9,150 additional dwellings. This requires the plan (in Policy H1) to identify</p>

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							<p>land for an additional 3,128 new dwellings (over and above existing commitments). Some sites are rolled over from the last UDP (which does not automatically make them good sites) but there are many new ones too (as identified later in this section). A lot of these are new greenfield sites and because the Council wants to try and keep to its broad locational strategy, these greenfield sites are alongside or near to key regeneration initiatives or areas of brownfield land.</p> <p>The scale of this release causes substantial alarm for a number of reasons. This is because it is at odds with the recognised development capacity of the house building industry in the area - both locally and regionally. It is so much higher (and goes well beyond what can be described as step change) that it is in fact likely to frustrate house building or delivery of infrastructure rather than accelerate or improve it.</p> <p>This is basic development economics and will occur because of a clear imbalance in supply and demand for sites and homes. It will dilute value and will either discourage land sales or significantly reduce the scope for development to fund essential infrastructure and planning gain. Developers will take positions on multiple sites and then negotiate terms based on a clear situation of oversupply. This could delay development or make it uneconomic or mean that some sites are in fact taken off the market.</p> <p>This is a real risk. The proposed level of growth - 610 dwellings per year - requires annual growth at a level not ever realised by the Council before . Past build rates are significantly lower: the 10 year average (2001-2011) is 340 dwellings per annum and the highest rate achieved was in 2010/11 when 411 units were built. This figure indicates the maximum build capacity of the County Borough, at a time where there was an injection of Social Housing Grant (SHG) funding and initiatives by house builders to complete sites and dwellings (para A.0.6, page 132, Pre-deposit LDP 2011). This indicates that, even when there is significant government funding to accelerate development, the highest rate per annum that has been achieved is 411, some 200 units less than the level of growth proposed each and every year in the DLDP.</p> <p>In this light, the DLDP has the potential to be very harmful. In its (2011) pre-deposit form the plan was much sounder - by aiming for about 400 dwellings per year, it was appropriate and realistic, yet was still ambitious and focused on projects that were important for a variety of reasons. This sensible approach to delivery appears to have been abandoned in the DLDP.</p> <p>It is difficult to see why this has happened or why there has been no reality check on what the plan proposes. Swansea Council - NPT's neighbour which jointly commissioned the PBA report - recognises the need for one. Its preferred level of housing growth, whilst still in excess of the annual completion trends over the last decade, is in line with the peak previous provision (which took place during boom times and relies on a lot of flatted development).</p> <p>Higher growth options considered by Swansea Council, which accord with the WG's 2008-based projections, were rejected on the grounds that the rate of population increase would be well in excess of that recorded over the last decade. In addition - and as stated above - the number of dwellings required to house the population increase would be significantly higher than the number of completions in the County even in the peak year of the last decade. In this light it is clear that Swansea Council recognised the 'serious question marks over the practicality for developers to build this number [very high] of homes during a 15-year period' (Swansea LDP, Preferred Strategy, June 2013, para 4.12).</p> <p>Swansea Council also warns of the risk that over-provision of housing would lead to increase commuting to jobs in neighbouring areas and could undermine regeneration objectives in other parts of the City Region. These concerns are also relevant to NPT - however, NPTCBC has not tested the high level growth option against these potential risks and implications.</p> <p>It is also important to note that despite this check on housing numbers, a significant amount of growth, including substantial urban extensions and new settlements is proposed in the Swansea LDP. This new development has the potential to further saturate the Swansea Bay housing market area which includes the main coastal area of Neath Port Talbot - exacerbating the concerns raised at the beginning of this section.</p> <p>The plan's impact could also, perversely, see event those sites which were not allocated come forward. This is because, by setting a very high target for housing in its LDP, the Council will establish a high requirement for its five year supply of land for</p>

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							<p>housing. Because allocated sites may be delayed or mothballed, it will be argued that further releases may need to be made to boost the supply and this may open the door for sites to come forward which have been rejected - but which may be even less sustainable.</p> <p>The potential for this already clear. The statement of common ground that has recently been submitted for the 2013 Joint Housing Land Availability Study makes the position on delivery very clear. For the first two years of the plan period, under 300 dwellings have been completed - less than half what would be required if the LDP's growth level is adopted. Already then 600 units have to be added to the remaining years. However, if it is adopted the development level will also drive the annual five year supply requirement. If that cannot be satisfied by allocated sites (and we are sure that it cannot) then the five year supply will be deficient leaving the Council very vulnerable at appeal.</p> <p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>

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							<p>Implications on Sustainability</p> <p>The combination of a very high of growth and an absence of any phasing or control raises implications for sustainability too. On one level - as set out above - it means that new greenfield sites, in areas with no infrastructure plan or strategy, could be developed instead of true regeneration initiatives which have been properly considered, follow a clear strategy, and deliver substantial economic benefit</p> <p>However, it also goes to a much more fundamental test of the LDP's soundness - namely the Council's Sustainability Appraisal (SA) of the plan and the growth options. The DLDP proposes that 610 dwellings (accounting for flexibility) are built per annum and therefore falls within the 'high growth' option considered at the Pre-deposit Proposals stage. The assessment of this level of growth (see table 2.1.1. of the 'growth options' background paper to the Pre-deposit LDP SA) indicates that the 'high growth' option will trigger a number of negative or significantly negative effects in terms of sustainability.</p> <p>The Pre-deposit LDP SA described the high and very high growth options as having '<i>generally more extreme scores, doing well for some aspects of health and wellbeing and the economy, but significantly badly for environmental issues and some social and economic indicators</i>' (para 7.4.1.8). This SA concluded that the 'moderate' growth option was the most effective balance of economic, social and environmental effects.</p> <p>In comparison to the firm and relatively objective conclusions made on growth options in the Pre-deposit LDP SA, the SA for the DLDP clearly finds it difficult to justify the consequences of the amended strategy in terms of the sustainability objectives (and a series of negative and significant negative effects are triggered by the 'high growth' option).</p> <p>The DLDP SA, in paragraph 7.4.1.2, also suggests that due to the strategic level of the options (proposed at the Pre-Deposit LDP stage), there are significant uncertainties about the effects of the differing growth levels since the details and implications cannot be fully known for all the alternatives. This explains why the analysis given can only be vague and the SA fails to recognise that there are feasible alternatives to the revised high level of growth proposed. Furthermore, as explained above, there is a risk that the assumed positive economic and social effects are not realised (and in fact inhibited). As a result, the proposed employment-led strategy could actually backfire (taking the benefits which balance any environmental harm with it). This would make even the DLDP SA much less clear in terms of the performance of the DLDP or its implications.</p> <p>Summary</p> <p>These last points emphasise wider concerns about the performance of the plan and its impact. It is clear that these all go to (or come from) a level of growth that the Council feels that it has to plan for (rather than a level that it knows is appropriate and can - with realistic levels of ambition and effort - be accommodated). The effects of this level are clear and are largely undisputed - because it plans for development rates in each and every plan year that have never been achieved (in any preceding year), the plan cannot be delivered and is not realistic. The strategy then fails the key tests it must pass, risks confusing the market (especially given its neighbours ambitions) and could stifle sustainable growth and economic progress.</p> <p>The evidence that the level of growth is based on is particularly fragile and points clearly to the Council being in the position to set its own levels (regardless of direction from WG). Helpfully, if these levels return to those set out in the 2011 Pre-Deposit LDP, then they will align reasonably closely with the 2011 based population projections (and the household projections they will inform). In this way the plan can be simply corrected with a development strategy that is still ambitious, but which is realistic and sustainable as well.</p>
Dep1347	Mr Huw Jones		589035	Object	Housing Sites	Policy H 1	<p>We wish to object to proposed new housing land allocation H1/25 which was deleted as a UDP allocation following adverse comments by the Inspector. Circumstances have not changed and the site does not have capacity to accommodate 50 dwellings. This has been substantiated by evidence submitted in the form of an updated Ecological Appraisal which disputes that the allocated site could accommodate 50 dwellings without major ecological impacts.</p> <p>We therefore consider that the scale of the allocation should be reduced to 25 and the numbers apportioned between that site and the site promoted. The Alternative site should therefore be allocated for 25 dwellings as per the site layout submitted which</p>

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							allows for the retention of ecological sensitive areas.
Dep589	Mr David Watkins	Natural Resources Wales	786443	Object	Infrastructure Requirements	Policy I 1	<p>Paragraph 3.0.24 Policy I 1 Infrastructure Requirements</p> <p>There does not appear to be any reference to sewerage and water systems/provision in this policy which could be paramount in development provision. This needs to be addressed.</p> <p>We welcome your reference to in this Policy to the provision of Biodiversity; Environmental and Conservation requirements to make a proposed development acceptable. There is reference to the Planning Obligations Supplementary Planning Guidance and we would be grateful to be consulted on this future document.</p>
Dep773	Mr Mark Newey	Welsh Government	211935	Object	Infrastructure Requirements	Policy I 1	Further clarification is required on whether the Community Infrastructure Levy (CIL) will be taken forward when pooled Section 106 contributions are no longer allowed after 6 April 2014 (as currently proposed by DCLG) to deliver the necessary infrastructure and the timing of any transition to a CIL. If there is no CIL in place until after April 2014 there could be a policy vacuum in the plans ability to capture financial receipts. It is not in the interest of the plan to create a policy void and would affect deliverability.
Dep836	Mr Richard Price	Home Builders Federation	196451	Object	Infrastructure Requirements	Policy I 1	<p>This policy requires planning obligations to be sought for various reasons. We are encouraged by the Council's recognition by the financial situation in paragraph 3.0.27, however we believe this paragraph should explicitly state that the council will take a 'flexible approach' to requiring planning obligations, which seems to be a common theme within other LDP policies, particularly the policies related to the housing strategy. The policy should also give recognition to the cumulative impact of policy and regulation on the viability of developments. Even though it might not be the case that one policy or piece of regulation has an impact on development viability, the cumulative impact of policy and regulation can often render developments unviable. We also believe the reference to 'level of viability' does not make sense. A scheme is either viable or not and therefore the paragraph needs to be reconsidered in this regard.</p> <p>We believe the Policy or paragraph should be reworded as follows:-</p> <p>The Authority will take a flexible approach to requiring planning obligations. Recognition will be given to the financial viability of the development proposal and the costs of the proposed new or improved infrastructure requirements. Recognition will also be given to the cumulative effect of policy and regulation (both national and local), when considering the impact of planning obligations on the viability of proposed developments. Where necessary, the authority will enter into negotiations with developers to discuss viability issues in order to ensure the development proposal remains viable and deliverable. In some cases, this might require additional information from the developer to justify their position.</p>
Dep835		Ryehill Properties (Wales) Ltd.	787653	Object	Infrastructure Requirements	Policy I 1	<p>The policy is considered to fail the following tests of soundness:</p> <ul style="list-style-type: none"> • C2 - It has regard to national policy • CE2 - It is reasonably flexible to enable it to deal with changing circumstances <p>Accordingly Policy I1 needs to be amended to reflect that in negotiating S106 contributions, development viability will be considered.</p> <p><i>'In identifying the appropriate provision due regard will be paid to site specific issues and the overall economics and viability of proposals'</i></p> <p>Whilst reference is made to this matter in the supporting text, it is considered that the reference also needs to be made to it in the policy itself.</p>
Dep230	Mr Paul Bulmer		345444	Object	Development in Mineral Safeguarding Areas	Policy M 1	I see that the safeguarded minerals (namely coal) covers almost the whole of the Bryn Valley. This does still cause concern since I can not see anything in the LDP that says these will not be exploited. I have seen reference to the 500m exclusion zone for open cast mining but the residents of Bryn have already fought off such proposals outside of the zone in the past.
Dep779	Mr	Welsh Government	211935	Object	Development in	Policy M	Criteria 1 and 4 do not take into consideration the importance of/or impact on the resource to be considered against the nature of

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	Mark Newey				Mineral Safeguarding Areas	1	<p>the development being proposed.</p> <p>Criterion 1 should clarify the term 'value'.</p> <p>Criterion 4 could be redrafted to make it clear that the need for the development overrides the need to protect the resource, including a requirement for prior extraction.</p>
Dep752	Mr Philip Garner	Confederation of UK Coal Producers (CoalPro)	558289	Object	Development in Mineral Safeguarding Areas	Policy M1	<p>We think that in general the plan is robust and sustainable, and in respect of minerals considers properly the safeguarding and the factors to consider for any application to work coal.</p> <p>We have only two specific concerns, which we have explained in the attached Representation Form. We think that both these points are a matter of clarity and would emphasise that the document with respect to minerals is a good and thorough proposal.</p> <p>It is not clear whether this map indicates only the areas of Primary and Secondary shallow coal resources which could be exploited by opencast coal mining or attempts to show the potential resources which could be extracted by underground mines. If the map does not indeed show the deeper coal resources then there is the potential for sensitive structures to be permitted above these seams and thus sterilising the future workings of some of the resource.</p>
Dep720	Mr Mark Harrison	The Coal Authority	787361	Object	Development in Mineral Safeguarding Areas	Policy M1	<p>The Coal Authority objects to the exclusion of Tertiary surface coal resource from the Proposals Map and considers that the Tertiary surface coal resource should also be safeguarded under Policy M1. We acknowledge the advice set out in MTAN2, however we do not consider that this takes full account of wider UK Government objectives on national energy security.</p> <p>The Coal Authority as the licensing body for the UK coal resource considers that the entire surface coal resource shown on the Coal Authority/BGS resource map across the County previously provided by us to the Council is, for planning purposes, both proven and economically viable for potential extraction in the foreseeable future such that safeguarding is both appropriate and necessary in line with the objectives of MPPW and MTAN2. This requirement is heightened when the need for UK energy security is taken into account, and in overall sustainability terms the carbon footprint of indigenously produced coal is substantially lower than coal imported from other countries. Safeguarding is a long term planning tool extending well beyond the plan period and as such any approach chosen must be sufficiently flexible to deal with the changing energy market.</p> <p>Whilst we acknowledge the requirements set out in MTAN2 in relation to safeguarding only Primary and Secondary coal resources, The Coal Authority has consistently sought its wider application in Wales to include the Tertiary resource in order to prevent the possible sterilisation of the resource which may be vital towards the future energy security.</p> <p>The Coal Authority as the relevant expert body considers that all of the coal resource meets the planning policy test of being proven and economically viable such that the principle of safeguarding is justified. This is further amplified in South Wales when you start assessing how much of the overall coal resource is already sterilised by the urban areas of 'the Valleys'. This potentially leads to the sterilisation of substantial amounts of the overall surface coal resource (Primary, Secondary and Tertiary). Due to the historical connection with coal extraction, settlements tended to grow up near to the outcrops of the coal resource meaning that most of them now lie on and sterilise vast parts of the Primary and Secondary resource. The Tertiary coal resource generally lies further away from settlements; given environmental and amenity constraints imposed by National Policy in PPW, MPPW and MTAN2 future coal extraction is likely to need to consider extraction opportunities within the Tertiary resource in order to stand any potential favourable consideration by the MPA. The Tertiary coal resource tends to lie in the more remote parts of South Wales.</p> <p>The nature of planning policies applicable to the potential for surface development outside of the settlements is the same, whether that is Primary, Secondary or Tertiary resource. Consequently all three parts of the surface coal resource is equally at risk of potential sterilisation from surface development; therefore there is no planning justification to deal with different parts of the coal resource differently in safeguarding terms. The MPA has not claimed that it is impractical to safeguard the Tertiary resource for any reason which The Coal Authority and other consultees could consider and accept if appropriately justified.</p> <p>There is no firm evidence base underpinning the choice of only safeguarding the Primary and Secondary coal resource, the LDP</p>

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							has simply followed MTAN2. However, this guidance does not indicate how it justified this stance. It is a fact that there is likely to be more overburden overlaying the coal measures in some parts of the Tertiary resource, however it maybe still economically viable to extract such coal resource by surface mining at this time and indeed areas of search were previously identified by the former British Coal in the Tertiary Resource as opencast prospect areas. With the likelihood of continued rising energy prices, the viability of coal extraction will at least continue if not improve over the plan period. The safeguarding approach pursued by the Welsh Government in MTAN2 is at odds with policy in England, which is set out in the National Planning Policy Framework. Given the recognition of MPPW that the UK demand for energy minerals is the driving factor, The Coal Authority considers that a UK-wide consistent approach to safeguarding the coal resource is necessary.
Dep473	Mr Jon Timothy	Carmarthenshire County Council	201980	Object	Surface Coal Operations	Policy M 2	It is noted that 500 metre zones have been identified on the Proposals Maps in relation to this policy (M2/1). In light of this we feel that it is prudent to inform you that Carmarthenshire also identified similar zones in its Deposit Plan but this resulted in an objection from the Welsh Government who stated that "protecting buffer zones around such settlements is not a requirement in national policy" and that they "do not consider this concept suitable for mapping." Carmarthenshire has consequently proposed the removal of these zones as a 'focused change' to their Deposit Plan.
Dep782	Mr Mark Newey	Welsh Government	211935	Object	Surface Coal Operations	Policy M 2	This repeats national policy. MTAN 2: 'Coal' paragraph 26 states "Policies should state where such operations would not be acceptable and should provide unequivocal statements as to why, and should also provide a set of clear criteria against which any future proposals will be assessed in those areas where there is a possibility of extraction." Criterion 1 - Can the policy/text define exceptional circumstances, particularly as they are set out in MTAN 2. Criterion 2 and 3 - the authority should identify the international and national areas of environmental and cultural importance in the County and reflect them spatially.
Dep801		Associated British Ports	587221	Object	Surface Coal Operations	Policy M 2	Policy M2/1 relates to land located within the Port Talbot Dock Area although the exact area of land to which it relates does not seem to be clearly delineated. The LDP Proposals Map Legend states that Policy M2/1 relates to a Settlement Protection Zone and the LDP text states that Policy M2/ 1 relates to Surface Coal Operations. As currently drafted the Proposals Map and LDP text are confusing. It appears that the M2/ 1 designation intends to show where surface coal operations would be unacceptable but clarification on this point should be provided and clarification should also be provided as to what exact area of land Policy M2/1 relates to within ABP's ownership. This matter should be clarified as soon as possible. Alternatively, the policy allocation should be removed from the LDP.
Dep721	Mr Mark Harrison	The Coal Authority	787361	Object	Surface Coal Operations	Policy M 2	The Coal Authority considers that the wording of Policy M2 should be amended to better reflect that of MPPW and MTAN2. These national planning policy documents refer to "areas where coal working will not be acceptable" rather than "unacceptable in principle." Policy M2 also simply applies a rigid 500m distance for such areas, taken from paragraph 29 of MTAN2, unless the Council deems there to be exceptional circumstances. The Coal Authority considers that Policy M2 would be more effective and consistent with national policy by referring directly to paragraphs 49-51 of MTAN2 instead. We would therefore recommend that Policy M2 be reworded as follows: <i>Policy M2 Surface Coal Operations</i> <i>Surface coal operations will not generally be considered acceptable where they :</i> <i>1. Are within 500 metres of a settlement (unless the proposal can be demonstrated to meet the exceptional circumstances set out in paragraphs 49 to 51 of MTAN2);</i> <i>2. Are within or adversely...</i>
Dep785	Mr Mark Newey	Welsh Government	211935	Object	Development in Mineral Buffer Zones	Policy M 3	MPPW (paragraph 40) states that buffer zones are required around permitted and proposed mineral working and should be indicated on the proposals map. Policy M3 should identify buffer zones on the proposals map up to the edge of the settlement boundaries.
Dep722	Mr Mark	The Coal Authority	787361	Support	Development in Mineral Buffer Zones	Policy M 3	The Coal Authority supports the inclusion Policy M3, which defines appropriate buffer zones on the Proposals Map to protect existing and proposed mineral sites from sterilisation by sensitive non-mineral developments, in line with paragraph 40 of

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	Harrison						MPPW.
Dep815	Mr Mark Newey	Welsh Government	211935	Object	Development in Mineral Buffer Zones	Policy M 3	<p>The following observation is made regarding the proposals map:</p> <ul style="list-style-type: none"> Some of the colours used for existing sites are not the ones reflected in the key. This is likely to be a printing or cartographic issue but would benefit from clarification. For example, operational coal sites are coloured grey, but there appear to be some existing sites with buffer zones which are coloured green (SP17/1)?
Dep748	Mr Philip Garner	Confederation of UK Coal Producers (CoalPro)	558289	Object	Criteria for the Assessment of Mineral Development	Policy M 4	<p>We think that in general the plan is robust and sustainable, and in respect of minerals considers properly the safeguarding and the factors to consider for any application to work coal.</p> <p>We have only two specific concerns, which we have explained in the attached Representation Form. We think that both these points are a matter of clarity and would emphasise that the document with respect to minerals is a good and thorough proposal.</p> <p>Bullet point 2 refers to "can the mineral feasibly be supplied from secondary sources?" We believe that this question is not sufficiently specific or detailed, the matter of feasibility has to consider all aspects of logistics, economics (price and local employment and local income), environmental aspects (including the overall carbon footprint of a secondary supply), any improvement of land value or use after mining and any remediation of legacy mining issues which are incorporated in the scheme. It would be prudent to attempt a definition of secondary sources if that phrase remains in the final document, it may well be possible to obtain coal and other minerals from other sources, but is it the best solution for Neath Port Talbot and for Wales? The intent may be that secondary sources imply recycling of some other waste, in which case the statement should specify that to be the preferred solution.</p>
Dep674	Mr David Watkins	Natural Resources Wales	786443	Support	Criteria for the Assessment of Mineral Development	Policy M 4	<p>Paragraph 5.3.78 Policy M 4 Criteria for the assessment of Mineral Development</p> <p>We welcome and support this policy as there is clear reference to proposed development demonstrating that there will be no "unacceptable impacts upon the environment" (Para 5.3.80).</p>
Dep624	Mr David Watkins	Natural Resources Wales	786443	Object	Open Space Provision	Policy OS 1	<p>Paragraph 5.1.55 Policy OS 1 Open Space Provision</p> <p>As is noted in Technical Advice Note 16: Sport, Recreation and Open Space (2009) the former Countryside Council for Wales has produced a toolkit that can be used to help ensure access to natural greenspace. It recommends that no one should live more than 300m from their natural greenspace. The Welsh Government's Strategy for Sport and Physical Activity 'Climbing Higher' (2005) also has a target that by 2025, no-one should live more than a 6 minute walk (300m) from their nearest natural green space.</p> <p>Given the potential recreational and wellbeing benefits provided by natural green spaces, we are disappointed that this toolkit does not seem to have informed this policy. We therefore recommend that the policy should be amended to include a specific reference to "Accessible Natural Green Space" in the list of open space types, with a standard of: at least 0.25ha of accessible natural greenspace per 1000 population, and that no one should live more than 300m from their natural greenspace.</p>
Dep627	Mr David Watkins	Natural Resources Wales	786443	Support	Protection of Existing Open Space	Policy OS 2	<p>Paragraph 5.1.60 Policy OS2 Protection of Existing Open Space</p> <p>We support the above policy.</p>
Dep281	Mr David Llewellyn	Bridgend County Borough Council	199968	Support	Criteria for the Assessment of Renewable and Low Carbon Energy Development	Policy RE 1	<p>Policy RE1 - Renewable and Low Carbon Energy</p> <p>BCBC welcomes the designation of the refined Strategic Search Areas (SSAs) within the deposit Plan. These were identified as a result of work which was carried out in 2006 in conjunction with the two Councils as well as the City and County of Swansea, Carmarthenshire County Council and Rhondda Cynon Taff County Borough Council. The designations of the refined areas on the Proposals Map reflect those areas in Bridgend County Borough as shown in the adopted Bridgend LDP.</p>
Dep768	Mr	Welsh Government	211935	Object	Criteria for the	Policy	The refined boundary for SSA 'E' in the Proposals Map only includes part of the proposed refined boundary in the Arup

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	Mark Newey				Assessment of Renewable and Low Carbon Energy Development	RE 1	Technical Study. The reason for this should be clarified. The proposed refined SSA boundaries, particularly SSA 'E', are significantly smaller than the boundaries set out in TAN 8. The refined boundaries have the potential to constrain the potential contribution of the SSAs to the Welsh Government's renewable energy aspirations. The LPA need to demonstrate why the refined areas are significantly smaller than those expressed in TAN8 and how the plan will deal with technically feasible areas some 5kms from the margins (paragraph 2.2, Annex D, TAN8).
Dep795	Mr Mark Newey	Welsh Government	211935	Object	Criteria for the Assessment of Renewable and Low Carbon Energy Development	Policy RE 1	The wording of Policy RE1 is considered restrictive - remove "only" from the policy.
Dep676	Mr David Watkins	Natural Resources Wales	786443	Object	Criteria for the Assessment of Renewable and Low Carbon Energy Development	Policy RE 1	Paragraph 5.3.92 Policy RE1 Criteria for the Assessment of Renewable and Low Carbon Energy Development Part 2 of this policy is totally unacceptable as it essentially advocates the acceptance that renewable schemes will cause damage or disturbance to the environment and amenity of neighbouring land. Whilst we support the reference to environmental considerations in criterion 2, we recommend that the policy should seek to minimise adverse effects rather than 'reduce' adverse effects. We therefore recommend that Criterion 2 is amended by replacing "reduce" with "minimise". We consider such an amendment to be consistent with the objective to support and enhance the county's natural heritage and meets Test of Soundness CE1. This Policy needs revision.
Dep813	Mr Richard Buckland	Infinis	786727	Support	Renewable and Low Carbon Energy in New Development	Policy RE 2	The following policy is supported as being consistent with and reflective of national planning guidance. The policy wording is welcomed as forming a logical flow from the overarching objective. Policy RE2 - Renewable and Low Carbon Energy in New Development
Dep153	Mrs P Millin		781655	Support	Settlement Limits	Policy SC 1	Thank you for informing me of the proposals to apply for planning permission to build in Fernfield, Baglan. I would like to reiterate all points previously made. I am asking you if possible to have a meeting with me as unless you have driven into Fernfield it is not possible to explain the difficulties and impracticality of trying to build here.
Dep633	Mr V Price		196316	Object	Settlement Limits	Policy SC 1	Policy SC1 is admirable insofar as it allows for some exceptions to the general approach of resisting development outside of settlements. However criteria 1 and 2 are not flexible enough to achieve their purpose. It would be beneficial to the areas outside Port Talbot and Neath, including therefore Bryn, if the policy was amended as follows: "1. It constitutes a sustainable small scale employment use either adjacent to a settlement limit, on infill sites between existing built form, or in locations within very close proximity to public transport services and pedestrian/cycle access. 2. It constitutes live/work units on land that is well-located to existing built form, including clusters of rural development, or adjacent to a settlement limit and is accessible by public transport and has reasonable pedestrian/cycle access."
Dep458	Mr Tony Brinkworth		218483	Object	Settlement Limits	Policy SC 1	I would suggest that the LDP Plan should include the following wording: Sites of exceptional merit will be fully assessed when they are in a sustainable location in close proximity to a settlement limit.
Dep451	Mr Tony Brinkworth		218483	Object	Settlement Limits	Policy SC 1	I would suggest that the LDP Plan should include the following wording: Sites of exceptional merit will be fully assessed when they are in a sustainable location in close proximity to a settlement limit.
Dep453	Mr Tony Brinkworth		218483	Object	Settlement Limits	Policy SC 1	I would suggest that the LDP Plan should include the following wording: Sites of exceptional merit will be fully assessed when they are in a sustainable location in close proximity to a settlement limit.

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Dep430	Mr Edward James		449822	Object	Settlement Limits	Policy SC 1	<p>Delete "adjacent to" and "immediately adjacent to", replace with "in close proximity" in subsection 1 and 2</p> <p>Representation on Policy SC1 and EC6</p> <p>Both policies state that they will help reinvigoration. Because they are limited to only sites on the settlement limit and they do not want 'bad neighbours' hardly any will be built (5 - 10 predicted).</p> <p>By changing the wording more sites would benefit including my site NV73 Land at Lon-y-Bryn, Glynneath.</p> <p>In the present form SC1 and EC6 are not logical and the development will not logically come from it. It is too inflexible.</p>
Dep586	Mr David Watkins	Natural Resources Wales	786443	Support	Settlement Limits	Policy SC 1	<p>Paragraph 3.0.11 Policy SC 1 (Settlement Limits)</p> <p>We support this policy.</p>
Dep702	Mr Cledwyn Edwards	Tonmawr Rugby Football Club	588833	Object	Settlement Limits	Policy SC 1	<p>Whilst Policy SC1 gives criteria for various uses outside the settlement boundary, we suggest that Criterion 12 is amended to include the revised text highlighted below in order to make future provision of facilities close to the existing pitches: Receipts from the sale of land east of Tonmawr Rugby Club would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches, further to the north. Therefore Policy SC1 needs to be amended in order to allow for this eventuality.</p> <p>Future development opportunities need to be allowed for as the club is very much the focal point of the local and wider community not only providing facilities for rugby but also numerous other activities. Many organisations use the facilities for a variety of activities, i.e. school's sport's days, village fayre, Community First activities, PTA fund raising activities, BBQ's, ladies & male choirs, senior citizens, church. Many charity events, fundraising events are held at the clubhouse and playing fields contributing to an energetic community spirit.</p> <p>1.0 INTRODUCTION</p> <p>1.1 These representations are submitted on behalf of Tonmawr Rugby Football Club (RFC) who are promoting land for development on their existing clubhouse site together with open land to the east. It is disappointing that, while the clubhouse site remains within settlement limits in the Deposit Local Development Plan, land to the east, which is within the Club's ownership, and which is included within the current adopted Unitary Development Plan boundary, is proposed to be excluded.</p> <p>1.2 We are also aggrieved that, despite the requirements of the Local Development Plan process to engage with key stakeholders, Tonmawr RFC were not consulted at any previous stage of the Plan process regarding the decision to exclude the land.</p> <p>1.3 Tonmawr RFC represent a key organisation in the village, which caters for young people, provides community facilities in the club house (there is no pub), and allows the nearby primary school to use its pitches.</p> <p>1.4 The future development potential of the land concerned needs to be safeguarded, as a future housing scheme would not only provide a range and choice of new dwellings and contribute to the regeneration of the village, but receipts from the sale of land would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches.</p> <p>1.5 Section 2 of this submission describes the site. Section 3 provides representations on the Plan Strategy; Section 3 discusses the Overarching, Area and Topic Based Policies; Section 5 discussed the Sustainability Appraisal Self Assessment; and Conclusions are made in Section 6.</p> <p>2.0 SITE DESCRIPTION</p> <p>2.1 Location</p>

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							<p>Tonmawr is a former coal mining village lying some 4 kilometres east of Cimla, 6 kilometres east of Neath Town Centre and some 1.5 kilometres north of the linear settlement of Efail Fach/Pontrhydyfen. In the Deposit LDP - Settlement Topic Paper (August 2013), under the Afan Valley Spatial Area, Tonmawr is described as : ‘a sizeable settlement located north-east of Efail Fach. It offers a good range of community facilities as well as local business premises for employment uses.</p> <p>2.2 Site Description The site has an area of 1.98 hectares and lies to the south of Tonmawr Road, an unclassified road which joins the B4287 Road at Efail Fach. The site comprises two distinct parts, the Rugby Club site, with the club building and associated car park and grassed areas, and the open land to the east.</p> <p>2.3 An access is achieved from Tonmawr Road some 40 metres north of the Club building which also serves the adjacent Community Centre. To the north is a stream, the Afon Pellena. The northern boundary of the site has been drawn to exclude an area of flood risk associated with the stream.</p> <p>2.4 The land to the east has a moderate slope upwards to the south-east where it bounds a forestry track now also used as a recreational route. The site comprises bracken and scrub and is bounded to the north and east by large mature trees, a mixture of broad leaved and conifer species.</p> <p>3.0 REPRESENTATIONS ON THE PLAN STRATEGY</p> <p>3.1 Section 2 - The Strategy is supported , in particular the Area Based Objective OB6 , i.e. ‘Reinvigorate the Valley Areas and improve economic prospects recognising the role of Glynneath and Pontardawe in delivering sustainable growth.’</p> <p>3.2 Objective OB7, which seeks to ‘Provide an adequate supply, mix type and tenure of housing within sustainable settlements to meet the needs of the projected population’ is also generally supported.</p> <p>3.3 The Spatial Strategy, which influences the distribution of growth "focuses new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities." As such it is intended to focus the majority of development along the M4 corridor and in the urban areas of Neath and Port Talbot. It is recognised that the economic-led growth strategy will result in the majority of housing (8,000 new homes) and employment (3,850 new jobs) land being concentrated in the coastal area.</p> <p>3.4 Paragraph 2.5.3 refers to a more flexible approach to development in the Valleys compared to the coastal corridor, which will help to invigorate communities. Paragraph 2.5.4 states that the settlement strategy is a fundamental mechanism, identifying communities that have the sufficient capacity and resources to accommodate development within designated boundaries.</p> <p>3.5 Whilst the above elements of the Plan can be considered sound, the means by which these aims are intended to be achieved are disputed. We shall therefore elaborate in our following comments on the Overarching and Topic Based Policies</p> <p>4.0 REPRESENTATIONS ON OVERARCHING, AREA AND TOPIC BASED POLICIES</p> <p>4.1 Despite the provisions in the Settlement Strategy which relate to the need for flexibility in the Valley areas, in the case of Tonmawr, the potential for such flexibility has been diminished by the ‘drawing in’ of settlement limits and the consequent reduction of land which is capable of providing for much needed growth in a community acknowledged in the Settlement Topic Paper as having a good range of community facilities. These include a shop/post office, primary school, hourly bus service (159 - Neath to Blaengwynfi), community centre, employment uses, and as a focus for the community, the rugby club. The club is very much the focal point of the local and wider community not only providing facilities for rugby but also numerous other activities. Many organisations use the facilities for a variety of activities, i.e. school's sport's days, village fayre, Community First activities, PTA fund raising activities, BBQ's, ladies & male choirs, senior citizens, church. Many charity events, fundraising events are held at the clubhouse and playing fields contributing to an energetic community spirit.</p>

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							<p>4.2 In terms of Overarching Policies in Section 3, Policy SP3 (Sustainable Communities) which includes Tonmawr as a 'Small Local Centre' is acknowledged. The site being promoted, however, is not included within the settlement limits as identified on the Proposals Maps. Policy SC1 (Settlement Limits), and the Proposals Map are consequently objected to.</p> <p>4.3 Whilst Policy SC1 gives criteria for various uses outside the settlement boundary, we suggest that Criterion 12 is amended to include the revised text highlighted below in order to make future provision for facilities close to the existing pitches: 12. It constitutes the provision of Open Space and small scale ancillary facilities for existing recreation uses adjoining the settlement limit.</p> <p>4.4 As the combined club house site and land to the east is capable of accommodating a development in excess of 10 dwellings we also object to its non inclusion as a housing land allocation under Policy H1 in Section 5 - Topic Based Policies.</p> <p>4.5 It is noted that no new housing allocations are proposed in the Afan Valley area (Table 5.3) with only allowances for windfall and infill developments which amount to some 1.4% of the total housing development proposed in the County Borough as a whole.</p> <p>4.6 This is clearly inadequate, as in the other valley areas such as the Neath Valley, future growth is inked directly to tourism and employment initiatives. The Afan Valley has a growing reputation for cycling and other activities and provision should be made for appropriate development which will be attracted by the raised profile of the area. Various recreational initiatives, such as that proposed by Tonmawr Rugby Club, will also build on the leisure and tourism offer of the area.</p> <p>4.7 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>5.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE</p> <p>5.1 A Sustainability Appraisal of the site, using the Council's 'Traffic Light' methodology is included.</p> <p>5.2 This shows clearly that there are 10 positive scores, two neutral scores and one 'not applicable'. There are no negative factors identified. Clearly the benefits of developing the site would considerably out-weigh any negative factors. This points to a sound argument for seeking the site's allocation for housing.</p> <p>5.3 Table D.2 of the LDP Settlement Topic Paper shows that 12 services and facilities exist in Tonmawr which compares positively with other settlements, and bears out the findings of the Sustainability Appraisal.</p> <p>5.4 One factor which my clients have considered which could have contributed to the removal of the site from development limits is the fact that it has not emerged to date since the Unitary Development Plan was adopted.</p> <p>5.5 The undeveloped land was originally purchased from the Forestry Commission subject to a covenant restricting the future use to recreation or agriculture purposes. Recent discussions have been held with the NRW, who have responded positively to the modification of the covenant, subject to a proportion of the development value of the site.</p> <p>6.0 CONCLUSIONS</p> <p>6.1 This Submission has been prepared on behalf of Tonmawr Rugby Football Club who are promoting land for residential development. This includes the current club house and undeveloped land to the east which is included within the current Unitary Development Plan Settlement Limits for the village.</p> <p>6.2 In the Deposit Local Development Plan, however, the land to the east is not favoured for development. My clients are</p>

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							<p>disappointed in this context that, despite the LDP process aiming to be transparent with comprehensive stakeholder involvement, they were not consulted on the decision to remove the land from the village settlement limits.</p> <p>6.3 Consequently we wish to object to the land to the east of the club house not being included within the village settlement limits and we object to the whole site's non inclusion as a housing land allocation. We also suggest revised wording to Policy SC1 in order to allow for the future relocation of the club house with ancillary recreational facilities, in the form of an indoor training area/gymnasium.</p> <p>6.4 It is intended that receipts from the sale of the land for housing would finance such a new facility on land adjacent to the current rugby pitches. There would thus be significant benefits to the community and the regeneration of the area.</p> <p>6.5 A Sustainability Appraisal, using the Council's own methodology has established that positive benefits of allocating the site would far outweigh any negative aspects. As such we consider that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below.</p> <p>CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>6.6 We therefore urge the Council to respond in a positive way by including the site in any future Focused Changes to the Plan.</p>
Dep821	Mr Laurence Forse	Harmers Ltd	786729	Object	Settlement Limits	Policy SC 1	<p>Amendment to Policy SC 1 - Settlement Limits</p> <p><i>"Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.</i></p> <p><i>Outside settlement limits, development will only be permitted under the following circumstances:</i></p> <ol style="list-style-type: none"> <i>1. It constitutes a sustainable small scale employment use adjacent to a settlement limit; or</i> <i>2. It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only; or</i> <i>3. It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building; or</i> <i>4. It constitutes a sensitive infilling of small gaps within small groups of houses, or minor extensions to groups, dependant upon the character of the surroundings and the number of such groups in the area; or</i> <i>5. It constitutes the appropriate replacement of an existing dwelling; or</i> <i>6. It is an affordable housing exception site; or</i> <i>7. It is an appropriate rural enterprise dwelling; or</i> <i>8. It is an appropriate 'One Planet Development'; or</i> <i>9. It is a sustainable tourism or farm diversification proposal that is suitable in a countryside location; or</i> <i>10. It is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere; or</i> <i>11. It is associated with either agriculture, forestry, minerals or energy generation; or</i> <i>12. It relates to the appropriate provision of accommodation for Gypsies / Travellers; or</i> <i>13. It constitutes the provision of Open Space and small scale ancillary facilities adjoining the settlement limit.</i> <p><i>Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form".</i></p> <p>The amendment to the wording relates to a change in policy wording of SC 1 - Settlement Limits; this would include an additional circumstance (as shown in bold above) which would allow for the development outside of the settlement limits. As it currently stands the circumstances in which development outside of the settlement limits in regard to sensitive infilling of a small gap is unknown and therefore inconsistent with the national policy as set out in the Planning Policy Wales Edition 5 - November</p>

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							<p>2012, which stipulates at para 9.3.2. that it may be acceptable for sensitive infilling of small gaps within small groups of houses. It goes on to say that it may be acceptable if it in particular meets local needs for affordable housing, and that it is in character with the surroundings and does not then produce a group of houses that is too large.</p> <p>If this proposed amendment is accepted it would lead to a clarification of whether the infilling of a small gap between existing residential dwellings outside of the settlement limits would be acceptable, and thus planning permission granted for such a development outside settlement limits.</p> <p>These proposed changes to Policy SC 1 - Settlement Limits would then see it meeting the consistency tests in regard to national policy, and clarify the position in which the Deposited Local Development Plan stands in regards to this issue.</p>
Dep396	Ms Rose Freeman	The Theatres Trust	196293	Support	Protection of Existing Community Facilities	Policy SC 2	We support the Plan and find it to be sound with regard to Policy SC2 Protection of Existing Community Facilities.
Dep587	Mr David Watkins	Natural Resources Wales	786443	Support	Protection of Existing Community Facilities	Policy SC 2	<p>Paragraph 3.0.17 Policy SC 2 (Protection of Existing Community Facilities)</p> <p>We support this policy.</p>
Dep408	Mr Sam Hawking		785482	Object	Protection of Existing Community Facilities	Policy SC 2	This key defining policy is passive. It prevents a proposal of development that would erode existing vital facilities but does not undergird or strengthen, or provide an active policy framework in this regard that seeks out such identified opportunities.
Dep631	Mr V Price		196316	Object	Climate Change	Policy SP 1	<p>Policy SP1 should also refer to reducing emissions from housing, including building new homes to suitable standards of energy efficiency through materials and optimising solar gain, because a significant contribution to the carbon emissions (and accordingly, climate change) comes from housing.</p> <p>Moreover, as a priority, the council in allocating sites should place greater weight on those that have a southerly orientation.</p>
Dep582	Mr David Watkins	Natural Resources Wales	786443	Object	Climate Change	Policy SP 1	<p>Paragraph 3.0.2 Policy SP 1 Climate Change</p> <p>We support this Policy and in particular your statement in relation to controlling proposed developments and flood risk by "guiding them away from land that is at risk from flooding or locations that could increase the risk of flooding elsewhere".</p> <p>However there seems to be a contradiction in relation to this Policy and the proposals to regenerate the Harbourside area, Port Talbot. Your Strategic Flood Consequence Assessment indicates that this scheme will have detriment upon 3rd parties in terms of flood risk. This is not in accordance with both National Planning Policy and your Policy SP1. There is a conflict between your Policy SP1 Climate Change and Policy SR2 Harbourside Strategic Regeneration area - this must be addressed.</p> <p>We support the protection of habitats in this policy but consider it needs to be strengthened by reference to the creation and enhancement of habitats. We do not support using the term " <i>where possible</i>" in the statement. This phrase should be omitted as it undermines the essence of this part of the policy.</p> <p>Please note also that climate change has implications for water as a resource and this is not addressed within this policy. Additionally opportunities to re-instate open watercourses to flood plains should be encouraged, in order to provide a more resilient ecosystem which could support a variety of habitats and wildlife. This requires inclusion in this policy.</p>
Dep810	Mr Richard Buckland	Infinis	786727	Support	Climate Change	Policy SP 1	<p>The following policy is supported as being consistent with and reflective of national planning guidance. The policy wording is welcomed as forming a logical flow from the overarching objective.</p> <p>Policy SP1 - Climate Change</p>
Dep584	Mr David	Natural Resources Wales	786443	Object	Health	Policy SP 2	Paragraph 3.0.5 Policy SP 2 Health

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	Watkins						<p>We support actions to improve the health of the local population but there is no reference to air quality within the policy - which is identified as a key objective within the Plan. Ref; OB 2 & OB 16. Your authority will have received our comments upon your draft Airwise Strategy document and our previous comments regarding the impacts of development upon air quality/Port Talbot Air Quality Management Area. This is an important issue which we hope that they will also be incorporated into the LDP and it is recommended that this addressed within this Policy.</p> <p>Additionally the Ecosystem approach could provide assistance in improving the mental and physical wellbeing of your local population.</p>
Dep585	Mr David Watkins	Natural Resources Wales	786443	Support	Sustainable Communities	Policy SP 3	<p>Paragraph 3.0.8 Policy SP 3 Sustainable Communities</p> <p>We support this policy.</p>
Dep407	Mr Sam Hawking		785482	Object	Sustainable Communities	Policy SP 3	<p>This key defining policy does not address the key principles to what will ensure the loss of an existing marginal village like Duffryn. It is passive. What should occur is a 'defining' of what intervention(s) might be required to protect the village's future.</p>
Dep818	Mr Mark Newey	Welsh Government	211935	Object	Sustainable Communities	Policy SP 3	<p>The proposals map would benefit from the inclusion of settlement names.</p>
Dep1280		Coombe Tennant Estate Co. Ltd.	457946	Support	Sustainable Communities	Policy SP 3	<p>Policy SP3 (Sustainable Communities) which includes Skewen as a 'District Centre' is acknowledged, as is Policy SC1 (Settlement Limits). The site being promoted is included within the settlement limits as identified on the Proposals Maps (Inset 28) and is consequently supported.</p>
Dep397	Ms Rose Freeman	The Theatres Trust	196293	Support	Infrastructure	Policy SP 4	<p>We support the Plan and find it to be sound with regard to Policy SP4 Infrastructure.</p>
Dep588	Mr David Watkins	Natural Resources Wales	786443	Support	Infrastructure	Policy SP 4	<p>Paragraph 3.0.21 Policy SP 4 Infrastructure</p> <p>We support this policy.</p>
Dep827		Network Rail	705055	Object	Infrastructure	Policy SP 4	<p>Developer Contributions</p> <p>The Local Development Plan should set a strategic context requiring developer contributions towards rail infrastructure where growth areas or significant housing allocations are identified close to existing rail infrastructure.</p> <p>Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>Specifically, we request that a Policy is included within the document which requires developers to fund any qualitative improvements required in relation to existing facilities and infrastructure as a direct result of increased patronage resulting from new development.</p> <p>The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impact on the rail network.</p>

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							<p>To ensure that developer contributions can delivery appropriate improvements to the rail network we would recommend that Developer Contributions should include provisions for rail and should include the following:</p> <ul style="list-style-type: none"> • A requirement for development contributions to deliver improvements to the rail network where appropriate. • A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. • A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.
Dep591	Mr David Watkins	Natural Resources Wales	786443	Object	Development in the Coastal Corridor Strategy Area	Policy SP 5	<p>Paragraph 4.0.2. Policy SP 5 (2) Development in the Coastal Corridor Strategy Area</p> <p>We note that Harbourside is identified as a strategic Regeneration Area within this policy. As highlighted previously, we continue to have concerns with this proposed development, mainly due to continued uncertainties regarding flood risk and air quality.</p>
Dep937		Oak Regeneration Incorporated	589629	Object	Development in the Coastal Corridor Strategy Area	Policy SP 5	<p>As the plan does not respond to key issues referred to under 'KI 14: There are significant areas of brownfield (previously developed) land requiring remediation and regeneration' and therefore fails to satisfy the above coherence and effectiveness tests, the following change to the plan (highlighted in bold) is proposed:</p> <p>Policy SP 5 Development in the Coastal Corridor Strategy Area</p> <p>In the Coastal Corridor Strategy Area, sustainable growth and development will be promoted to benefit the County Borough as a whole, while protecting and enhancing the area's character and environment. This will be achieved through the following area-specific measures:</p> <ol style="list-style-type: none"> 1. Making provision for the majority of new residential development along the Coastal Corridor; 2. Allocating Strategic Regeneration Areas at Coed Darcy (Neath) and Harbourside (Port Talbot); 3. Allocating Strategic Employment Sites at Baglan Bay and Junction 38 (M4) Margam; 4. Safeguarding existing employment uses and sites for employment purposes; 5. Promoting mixed use regeneration schemes at Neath Town Centre, Port Talbot Town Centre, Aberafan seafront and at Margam Surface Mine, notwithstanding that the latter is likely to come forward towards the end of the plan period ; 6. Developing a University Campus at Fabian Way; 7. Managing urban form and setting through the designation of Green Wedges; 8. Improving public and private transport provision including the following schemes: <ol style="list-style-type: none"> a) Highway improvements at Baglan Energy Park, Coed Darcy, Ffordd Amazon, and Harbour Way; b) New interchange and railway station improvements at Port Talbot; c) Park and Share scheme at Junction 38 (M4) Margam.
Dep833	Mr	St. Modwen	787655	Support	Development in the	Policy	St Modwen supports the plan's proposals for the Transit Site which forms part of a strong spatial strategy (described in Policy

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	Ben Cook	Developments Ltd			Coastal Corridor Strategy Area	SP 5	SP5) that focuses growth on the Coastal Corridor. The allocation (as area proposal number 6) recognises the potential for comprehensive regeneration and underscores the Council's commitment to Swansea University's new Bay Campus which is now well underway. The supporting text (in paragraph 4.0.5) makes clear the significance and scale of the initiative and the proposals map shows the right extent. The Plan also emphasises the sustainability of the location and the scope for a range of uses to be located there.
Dep929	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Development in the Coastal Corridor Strategy Area	Policy SP 5	The early and specific reference to the potential and significance of Coed Darcy as a key project (or one of the plan's 'anchors') is supported. We also support the attention that is given to Coed Darcy in Policy SP 5 (b).
Dep919	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Development in the Coastal Corridor Strategy Area	Policy SP 5	Policy SP5 identifies the strategic (but area-specific) measures which are proposed to deliver sustainable growth and development within the Coastal Corridor Strategy Area. This includes the allocation of Baglan Bay as a strategic employment site.
Dep643	Mr V Price		196316	Object	Development in the Valleys Strategy Area	Policy SP 6	<p>The division of the County Borough into two strategy areas seems to serve little purpose. Furthermore, the coastal corridor and the valleys have been delineated on the basis of eight spatial areas, creating a tangible line between the two areas (i.e. the coastal corridor and the valleys. In reality, if there is a need to divide the county borough, the boundary between the two should be 'fuzzy', insofar as there are parts of the county borough that share characteristics of both the valleys and the coastal corridor, such as Bryn.</p> <p>We suggest amending paragraph 2.3.12 so that the fourth bullet point says:- "- providing a more flexible to development within the valleys communities and the rural/semi-rural hinterland to Neath and Port Talbot."</p> <p>Paragraphs 2.5.50-54 should also be amended to reflect this. The paragraphs should relate to the rural hinterland of the towns, as well as the valleys.</p> <p>In addition, we do not consider the paragraphs create the level of flexibility that would benefit the valleys. Given that they are in need of inward investment, job creation and housing land (that is deliverable), we would encourage policies for this area (including the rural hinterland) that welcome new development ideas even if located on land outside of settlements (subject to material considerations such as landscape, biodiversity etc). This would truly be a flexible approach.</p> <p>This would also need to be identified within policy SP6, which needs to be renamed to "development in the valleys strategy area and rural hinterland."</p>
Dep597	Mr David Watkins	Natural Resources Wales	786443	Object	Development in the Valleys Strategy Area	Policy SP 6	<p>Paragraph 4.0.25 Policy SP 6 Development in the Valley Strategy Area</p> <p>Part 6 of this policy refers to the Rheola site and again we draw your attention to the question of flood risk and its implications upon the redevelopment of the area. As such, any development proposal will have to be supported by a Flood Consequence Assessment (FCA) to assess the risk.</p>
Dep791	Mr Ben Porte	Redrow Homes (South Wales) Ltd	461445	Support	Development in the Valleys Strategy Area	Policy SP 6	<p>Strategic Growth Area of Pontardawe</p> <p>Support is given to the identification of Pontardawe within Policy SP6 of the Deposit LDP as a strategic growth area. As confirmed at paragraph 2.5.35 of the Deposit Plan, the LDP seeks to reinvigorate the area and accordingly:</p> <p><i>"Development in these areas will provide managed growth consolidated into existing communities having regard to the social and economic role these settlements play within the wider context" .</i></p> <p>Support is therefore given to the identification of the Pontardawe growth area, as this recognises that additional housing development is needed and should be directed to the Pontardawe area in order to assist in the regeneration and growth of the area.</p>
Dep390	Mr		785388	Object	Development in the	Policy	Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the

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	H G Rees				Valleys Strategy Area	SP 6	<p>Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p> <p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes.</p> <p>Paragraph 2.5.49 should be amended to recognise the role that housing will play in regeneration and enabling re-development of the Estate.</p> <p>Policy SP6 (item 6) should make similar reference.</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p> <p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play in the regeneration of the Upper Neath Valley and beyond.</p> <p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p>

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							<p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the whole site.</p> <p>Comment</p> <p>It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan – having said which these comments use Rheola as an example that may not be repeated elsewhere.</p> <p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in</p>

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							<p>the Western Valleys Strategy initiate recognised this and it is argued that OB6 should make explicit reference to Rheola.</p> <p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to ‘drag’ economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion</p> <p>Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.</p>
Dep866	Mr Huw Thomas		782389	Object	Development in the Valleys Strategy Area	Policy SP 6	SP6: The Valleys Area - also to be included in delivery (page 99).
Dep1310	Mr Clive Reed	Swansea Valley Heritage	706760	Object	Development in the Valleys Strategy Area	Policy SP 6	The Western Valleys Strategy 2006 set out to control urban sprawl. The immense growth of the Craig Newydd housing development at Godre’r Graig has created a new town. Many more homes are planned in the future in the same area. I would like to see a halt to any further large-scale housing developments in the area unless they are accompanied by a similar number of full-time jobs created, not just construction work on building the houses, but in permanent employment.
Dep644	Mr V Price		196316	Object	Housing Requirement	Policy SP 7	<p>The strategy aims to re-invigorate the valleys area, but allocates no land within three of the valleys (two of which have no land bank sites either). This approach does not conform to the strategy.</p> <p>We are also concerned about the amount of development allocated to settlements within the coastal corridor but which share some characteristics of the valleys, such as Bryn. Its accessibility to Port Talbot and Maesteg suggest it requires more development than it has been allocated.</p>
Dep399	Mr Brian Thompson		331598	Object	Housing Requirement	Policy SP 7	<p>I would like to object to the inclusion of this allocation (H1/25) Ynysymond Road in the Local Development Plan (LDP) for the following reasons:</p> <p>1. Having researched the recent housing and planning policies set out by the Welsh Assembly Government (WAG) I understand that they base housing projections on recent trends reported by a number of organisations dealing in housing and census statistics. I also gather that they have adopted a different method of calculating the future housing requirements than the rest of the United Kingdom. This new method is as yet not proven to be a better method than that used in the past and once again we in Wales appear to be the "guinea pigs" for the WAG's attempts to go its own way, but that is another matter.</p> <p>I note that the projections being used in NPT follow the "trend" of the period between 2003 and 2008 which saw an abnormally strong population growth in the county compared to the longer spanned 1981-2003 period. In fact between 1996 and 2006 the authority's population decreased by 0.2% and the population in the county is only now at the same level as it was in the early 1980's.</p> <p>I would seriously question the soundness in using these short term 2003-2008 figures as being the most appropriate for planning growth over the long term 15 year LDP period. To compound this over optimistic trend whilst NPT have modelled a range of</p>

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							<p>population projections they took as their starting point what appears to be the "Very Highest" scenario (8554 houses) as set out in the Welsh Government 2008-based household projections. This was 36% higher than the figures (6280 houses) they set out in the public pre-deposition presentations as their preferred "Growth and Spatial Options". These early much lower figures were presented to the public in numerous meetings held by the council around the area and most people who do not wish to plough through the mountain of paperwork generated by this LDP exercise may well have taken this original publicized option of 6280 houses (quoted as just 50 houses for Pontardawe) as the figure now being processed through the final stages of the LDP system. There seems to have been a major sea-change in the council's stance since the early LDP consultation period and they have come up with a brand new "Changed Option". NPT have reduced the very highest scenario taken at the commencement of their changed option to now be around 31% higher for their final considerations however this now requires over 8200 new houses to be built to satisfy their new elevated projections. I would conclude that this is completely unrealistic and when linked with the abnormal growth seen in NPT population over the "trend" period almost certain to produce an over estimation of the housing requirement in the county.</p> <p>Further to this, given the unusual world situation since 2008 with regards to the global/local economy(s) and in particular the "flat" housing market, I would suggest that the methodology adopted by NPT in projecting constantly rising housing requirements has failed in its first few years and therefore is so flawed as to be unsound.</p> <p>As an explanation for this massive change to their plans I note that far from doing their own assessments and calculations NPT have relied heavily on a private consultancy firm, Peter Brett Associates from Reading, to undertake an economic study linked to house building. Peter Brett is a well-known firm who are intimately involved and work extensively with private housing developers. I have no doubt the "Chinese walls" argument will be invoked over this matter but I am uneasy that public bodies are falling back on consultancies that work extensively for the very people in whose interest it is to have an extensive permitted landbank of development land made available.</p> <p>Before using these constantly rising population figures NPT should fully explain why and how the county is going to be the focus of a surge in population the like of which we have not seen since the start of the industrial revolution. The WAG government have expressed the political wish to make the area an attractive zone for jobs and inward investment but I have no doubt WAG would say this for all areas of Wales. This is a fine political ambition but without concrete policies to state how it is going to be achieved it should not be the basis of a local authority's house building projections. I can see no value to the community in pursuing this pie in the sky methodology without historic migration figures being given their due weighting. If the economic miracle fails to materialise as "hoped for" by the council then all those house builders will be able to pick and choose which community to overdevelop to get a maximum profit. Of course the number of houses will be kept below limits that allow them to argue successfully with NPT against having to pick up the tab for new road access networks or properly sized sewers. This has happened in Rhos with Delffordd and is heading that way with the developments at the end of LonHir / Bryn Morgruig.</p> <p>It should not be beyond the scope of this process to develop a housing plan that contains a sliding option with primary and secondary sites that could react to any abnormal demand due to a rise in population levels. If the population does rise as "hoped for" along with economic regeneration then a second tier of sites could be brought in. This second tier should not be made available to developers in the first instance. The primary housing landbank should be concentrated in certain non-contentious areas such as Coed Darcy, which include new roads and infrastructure properly designed to cater for the number of dwellings built. Other more debatable areas such as Ynysymond where addition housing will stretch community resources past reasonable levels should be made unavailable until the primary zones are full. At the moment it is a free for all with communities losing out every time to the profits of developers. It is time the local authorities started listening and looking after the locals and localities better rather than trying to be "big government".</p>
Dep433	Mr Richard Davies		785950	Object	Housing Requirement	Policy SP 7	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro</p>

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							<p>data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p> <p>The policy should not state numbers of homes required. It should state that the required level of houses will be made available to meet the demand required due to any increase in economic growth and corresponding population. The number required will be determined through the stages of the plan.</p>
Dep488	Mr Richard Davies		785950	Object	Housing Requirement	Policy SP 7	<p>The economic forecast used to underpin the LDP is very optimistic. It is impossible to predict the economy 15 years ahead with any certainty. All the flexibility in the Peter Brett report and subsequent use within the LDP is in the upward direction. Where is the downward flexibility ? Without this, we could build houses that are not required whilst killing off greenfields that will never be recovered. Why do we not have a staged plan ? If the large increase in jobs is becoming a reality and all the available brownfield sites have been developed then and only then release our greenfields.</p>

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Dep719	Mr Mark Newey	Welsh Government	211935	Object	Housing Requirement	Policy SP 7	<p>Housing provision</p> <p>The latest Welsh Government population and household projections are the 2008 based projections, indicating that approximately 10,500 dwellings are required over the plan period. Planning Policy Wales (PPW) paragraph 9.2.2 states that these should form the starting point when preparing a plan. The Deposit LDP makes provision for 9,150 dwellings over the plan period in order to deliver approximately 8,000 units over the LDP period, 2011 to 2026. This is a significant shortfall of 2,500 homes below the latest (2008 base) Welsh Government's household projections .</p> <p>The Welsh Government's 2011 based population projections were published in July 2013 which provide an indication of the direction of travel for the future. Whilst the 2011 based household projections have yet to be formally published (anticipated towards the end of this year) and, acknowledging there are a variety of variables contained within them that different parties may have diverging views upon, officials from Planning Division estimate that there could be a reduction in dwellings of between 2,000 to 2,500 over the plan period from the 2008 based projections. This non-statistical estimate could therefore reduce the overall dwelling requirement to 8,000 to 8,500 dwellings. Obviously, the formal Welsh Government household projections will clarify this position later this year. (It is noted that NPT 'Population and Housing Topic Paper 2013, paragraph 4.2.4 arrives at a similar conclusion).</p> <p>The implication of the 2011 based projections, assuming the position stated above is confirmed, would result in the plan identifying sufficient land to meet the requirement set out in the projections, including a flexibility allowance for non-delivery resulting in a provision of 9,150 dwellings. Further technical work will be required following release of the 2011 based household projections, including re-running the assessment in Tables 7.9 and 7.11 of the Economic Study to identify any implications.</p> <p>There will be a need to examine in detail the precise implications of the formal projections to clarify this position . It should also be noted that the 2011 based projections will include data which includes a period of significant economic downturn. Consequently, it would not be prudent to plan for the future based on such negative conditions. Therefore, the 2011 based projections could be viewed as the floor for the dwelling requirement, i.e. a minimum.</p>
Dep732	Mr Mark Newey	Welsh Government	211935	Object	Housing Requirement	Policy SP 7	<p>Windfalls</p> <p>The plan estimates the delivery of housing on windfall sites to be 1,275 units (14%), averaging 85 units per annum. This is a significant increase above the average build rate of 55 units during the period 2001-2012. There appears to be no evidence to show there has been a significant change in circumstances to indicate there would be such an increase in the windfall allowance. This could result in an under provision of 450 units over the total plan period, again requiring further sites to be identified .</p>
Dep733	Mr Mark Newey	Welsh Government	211935	Object	Housing Requirement	Policy SP 7	<p>Windfalls</p> <p>It is unclear why the authority has included 'active and newly emerged sites' (Population and Housing Topic Paper, Table 9.8, p87) and 'extant planning permissions' (Table 9.9, p88) under the category of windfall sites. Sites benefiting from planning permission are commitments. It would be helpful if the authority could prepare a table in advance of the examination showing the latest commitments, windfalls, completions and land supply figures from the start of the plan period.</p>
Dep726	Mr Mark Newey	Welsh Government	211935	Object	Housing Requirement	Policy SP 7	<p>Flexibility allowance</p> <p>The authority has referred to a 13% 'flexibility allowance' or 'contingency allowance' (Policy SP7). Table 5.1 shows the flexibility allowance as 1,008 units, providing 12.5% flexibility. It would appear that this allowance encompasses both the vacancy rate of 3% and the flexibility allowance of 10%. However, this should be clearly stated in the plan. It is a matter for the authority to identify a level of flexibility that is appropriate for their area, having regard to the issues and the deliverability of sites in the plan period. (The Welsh Government has previously indicated a notional 10% flexibility in other LDPs.) The percentage of flexibility deemed appropriate by the authority should remain a fixed percentage. Applying a 13% flexibility allowance results in an approximate provision of 9,670 dwellings. The plan is currently approximately 520 short of this provision, requiring additional sites .</p>

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Dep747	Mr Keith Miller		278706	Object	Housing Requirement	Policy SP 7	<p>In summary, the housing requirement is too few and has not been fully justified. Consequently, the allocations and policies do not flow from a logical or coherent strategy because the strategy is flawed. The strategy, policies and allocations are therefore not the most appropriate, because additional allocations are required. This flaw makes the LDP unsound because it is not established on a robust evidence base. Furthermore, even though the housing requirement builds in a proportion for flexibility, the LDP is not flexible if it does not allocate sufficient land to meet the proper housing requirement.</p> <p>It is felt that the LPA have not justified their deviation from the Welsh Government's projections, as required by PPW. Their evidence, set out in Population and Housing Topic Paper (August 2013) is flawed, making the plan unsound. It is flawed because they have assumed that their economic-led strategy is correct, but have not explained why it is correct.</p> <p>Mr Miller submits that building rates have been too low for a number of years, accentuating the housing shortage and associated problems of affordability, housing need etc. In order to rectify previous mistakes, a higher quantum of development is required. The UDP required 6,155 homes to be built from 2001-2016 (an average of 410 per annum). According to the Population and Housing Topic Paper (August 2013), 3,388 were completed in the first 10 years (an average of 338 p.a.) - a shortfall of 72 per annum. This shortfall needs to be reflected in the LDP. It is debatable that "the UDP strategy can therefore be viewed as highly successful" as stated in paragraph 4.2.60 of the topic paper.</p> <p>The topic paper's stated reasons to depart from the WG 2008-based projections seem to be based on migration rates and that the annual requirement of 671 per annum has never been achieved. This contradicts the stated strategy for the county borough, which is to facilitate growth in the coastal corridor and reinvigorate the valleys (development strategy - page 15 of Deposit LDP).</p> <p>This is the opportunity to actually reinvigorate Neath Port Talbot - to stimulate the economy and drive growth. Housing can help achieve this, especially self-build schemes. The LDP should rectify the UDP's shortcomings, plan for growth and allocate more land for housing to compensate for the previous shortages.</p>												
Dep745		Tolkein Property Ltd	289531	Object	Housing Requirement	Policy SP 7	<p>Consideration of Housing Supply by the Plan In regards to the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); The Authority has chosen not to use the "Moderate" growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan. This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>8,027</td> <td>535</td> </tr> </tbody> </table>		Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	8,227	548	Deposit LDP	8,027	535
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							<table border="1" data-bbox="1344 220 2404 304"> <tr> <td data-bbox="1344 220 1700 304">Pre-Deposit Moderate Growth Strategy</td> <td data-bbox="1700 220 2056 304">6,279</td> <td data-bbox="2056 220 2404 304">419</td> </tr> </table> <p data-bbox="1344 325 1745 367">Table A: Growth Options Summary</p> <p data-bbox="1344 388 2783 619">As the above table confirms, whilst the now proposed dwelling requirement is higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows: <i>" The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time. "</i> (Paragraph 7.0.8)</p> <p data-bbox="1344 640 2783 777">Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2,542 units), it is considered that there will be a significant shortfall in housing provision across the County.</p> <p data-bbox="1344 798 2783 966">Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that: <i>" Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them... "</i></p> <p data-bbox="1344 987 2783 1186">In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following: <i>" The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot."</i> (Paragraph 5.0.7)</p> <p data-bbox="1344 1207 2783 1344">We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time.</p> <p data-bbox="1344 1365 2783 1501">In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy. In particular, the level of previous development across the County does not necessarily correlate to the level of need and demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p data-bbox="1344 1522 2783 1785">In addition, these projections overplay the impact of the recent recession on future housing requirement, and do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the economic downturn. It is considered likely that a more stable economic situation may result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years may result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period, not just be based on the short term (which is universally accepted as being unprecedented).</p>	Pre-Deposit Moderate Growth Strategy	6,279	419
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							<p>(with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority had not maintained a five year land supply since 2007. Whilst the 2011 and 2012 show a supply of 5.8 years and 6 years respectively, this is due to the method of calculation (i.e. based on previous completions) and is therefore not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. This strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement.</p> <p><i>Contingency / Flexibility Allowance</i> It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings.</p> <p>This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Furthermore, when compared with other emerging LDP's in Wales, it is clear that the allocation for 'uplift' has been significantly underprovided for. In particular and so as to evidence and illustrate out case, Torfaen County Borough Council's Deposit LDP provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council have considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. This outlines the Housing Requirement for the County over the plan period and illustrates that a contingency of 20% is provided for permissions that are not implemented - but in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for efficient and buoyant housing market". It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP.</p> <p>It is noted that in this regard, the Council states the following within the Population and Housing Topic Paper (August 2013): <i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for upto 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market. (Paragraph 7.0.21)</i></p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be</p>

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							<p>focussed on one site only, as this would not provide for a range of choice of locations, or give the Valley areas the ability to cater for any demand.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market.</p> <p><i>' Performance' of other LDP's</i> Evidence of the failure of LDP Plans to actually yield and deliver supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's Local Development Plan. This Plan, despite having been relatively recently adopted, has failed to ensure an adequate supply of housing land for the County Borough.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is only a few - 2 - years 'old' - having been adopted in March 2011).</p> <p>The following extract from the 2012 RCT JHLAS is relevant: <i>" The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years "</i></p> <p>In terms of the 'cause' of this undersupply, the following extract is relevant: <i>"This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone"</i></p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites: many of which have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites.</p> <p>In any event, the persistent <i>"difficult economic conditions"</i> recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p> <p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded.</p> <p>Assessment of Amman Valley for development Within the Deposit LDP - Population and Housing Topic Paper (August 2013), it is noted that 1.4% (130 dwellings) of the total housing requirements are directed to the Amman Valley. This is higher than the numbers outlined in the previous stages of the plan, and it is considered that this more closely recognises the importance of regenerating the area.</p> <p>In terms of the housing supply for the Amman Valley, it is noted that this is comprised of small sites and a windfall allowance. There are no allocations in the Amman Area and this raises serious questions as to the delivery of the 130 dwellings (an average</p>

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							<p>of 10 dwellings per annum over the plan period) over the plan. This is particularly the case due to both the historically low rate of windfall sites coming forward in the locality and the tightly drawn settlement boundaries in the Deposit LDP which will as a result unduly restrict such opportunities as it is considered to not provide sufficient land to meet the target.</p> <p>The 0% target for affordable housing, for the Amman valley is welcomed as this will ensure that any sites that do come forward will be more readily able to contribute to the wider regeneration aims for the area.</p> <p>It is therefore considered that a wider range and choice of housing sites needs to be provided within the Plan, and specifically the Amman Valley Area, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period.</p> <p>The Forge Washery site is considered to represent the most suitable, appropriate and deliverable option for development within the Amman Valley area, to ensure that the area is adequately provided for in terms of ensuring adequate housing provision over the Plan period.</p>
Dep600	Mr David Watkins	Natural Resources Wales	786443	Object	Housing Requirement	Policy SP 7	<p>Paragraph 5.1.1 Policy SP 7 Housing Requirement</p> <p>The housing requirement (8,000 units) would require a level of delivery that is significantly in excess of the average annual completion rate for the previous 11 years (332 per annum) as set out in Table 4.22 in the 'Population and Housing Topic Paper August 2013'. This element of the Plan is not within our remit but we just highlight that a large increase in the annual housing provision will be necessary to achieve these requirements.</p>
Dep846	Mr Richard Price	Home Builders Federation	196451	Object	Housing Requirement	Policy SP 7	<p>Supplementary paper for Policy SP7</p> <p>This is a supplementary paper from the Home Builders Federation, which should be attached to our representation for Policy SP7.</p> <p>Introduction</p> <p>Policy SP7 makes provision for roughly 8000 homes over the plan period. We do not believe this is an appropriate level of development for Neat Port Talbot and therefore the number of homes proposed for the LDP should be increased.</p> <p>1. Primary point of concern</p> <p>Paragraph 4.1.19 of the Population and Housing Topic Paper states that the 2011 Census based Household Projections (scheduled for release in Dec 2013) will be addressed through a background paper published prior to the Examination in Public. In light of this, and given that PPW states that the LDP should be based on the latest Household Projections, we respectfully reserve the right to comment in full on Policy SP7 through the Examination in Public.</p> <p>Notwithstanding the above, we do have some commentary on the decision to deviate from the 2008 projections, as set out within the Population and Housing Topic Paper. These points are addressed below.</p> <p>2. Overall argument for deviating from the 2008 projections</p> <p>We are not convinced by the Council's arguments for deviating from the 2008 household projections. In this respect, paragraph 4.1.42 of the Population and Housing Topic Paper states that the 2008 projection figures can show possible effects on population should the economy improve. In light of this, given the Council's aspirations for growth, we cannot understand why the Council would want to deviate from a set of projections that would provide baseline data to replicate what they would need to do in order to facilitate growth and investment. The decision to deviate seems to have been taken because past trends in population movements are slowing. As such, for the Council to move away from the 2008 projections in favour of underpinning the strategy on the continuation of more recent trends, effectively means the Council is actively planning for this decline to continue over the</p>

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							<p>LDP period. We do not believe this is appropriate.</p> <p>2.1 Migration levels</p> <p>In terms of migration levels, paragraph 4.1.47 of the Population and Housing Topic Paper states that the Welsh Government's 2008 based projections used an average taken from 2003/4 to 2007/8 to counter any volatility in migration data. The Topic Paper then goes on to describe that, whilst this is statistically sound, the Council does not consider it appropriate to use this data, as actual levels of migration are declining.</p> <p>In this respect, despite what evidence there is to demonstrate previous levels of in migration, for the Council to actively plan for declining migration levels when their strategy is one that actively plans for growth, is in our view, totally inappropriate. Migration levels are a component of change that can be influenced by the creation of forward-thinking local planning policy and as such, we cannot understand how the Council would wish to deviate from a projection that could result in stemming migration decline, in favour of one that continues past trends that they would no doubt wish to reverse. Indeed, the Council acknowledges that it is entirely possible for this trend to reverse, given that in paragraph 4.1.57 of the Topic Paper they state that there is also some evidence both nationally and locally that the economy is improving, which in turn will result in an increase in migration and a knock on effect on perceived future population forecasts. As such, the decisions provided to deviate from the 2008 Projections seem even more perplexing.</p> <p>In terms of the above, it would also seem that the Council has not utilised any 'policy decisions' to deviate from the projections (as required by PPW), rather they have merely used a different time period with which to consider past trends. As the Council rightly point out within the Topic Paper, any assumptions that are based solely on past trends will clearly allow those trends to continue. Also, within the Topic Paper, the Council acknowledges that population assumptions will be fuelled predominantly by migration levels and they concede that there is evidence that the trend is reversing. However, despite this and the knowledge that the LDP can further stimulate migration levels through its strategy and policies, the Council are still using the fall in recent migration trends as a justification to deviate from the 2008 projections. We do not believe this is appropriate.</p> <p>In light of the above, given the LDP's clear objectives for growth and investment, we do not believe it is appropriate for the Council to base the future housing prospects of the plan, on a period of migration decline that could be reversed if the policies in the plan were more aligned with the vision and strategic objectives set out.</p> <p>2.2 2011 Population Projections</p> <p>In terms of population movements, the Topic Paper suggests that the 2011 Population Projections describe a downward trend in population growth, when compared with the 2008 projections. However, paragraph 4.1.52 of the Topic Paper explains that the reason for this reduction is due to lower migrations assumptions as a result of the state of the economy (which are described by the Council as being more realistic) and a greater number of deaths over births, which is common place in an aging population.</p> <p>Firstly, given that population projections are based on past trends, it is evident that if past trends in population movements are declining, this will be replicated in any projections going forward. As such, it is no surprise that the 2011 Population Projections show lower population levels than presented through the 2008 Projections. Therefore, we believe it is inappropriate for the LDP to simply acquiesce to these most recent trends as being an inevitable course of events. Rather the challenge for the LDP should be how it plans to deal with this situation and reverse these trends, given its aspirations for growth.</p> <p>Secondly, in terms of the aging population, we believe it is inappropriate for the LDP to actively plan for an aging population over the LDP period. The previous Population and Housing Topic Paper (Sept 2011), was very vocal and indeed critical of the fact that Neath Port Talbot had an aging population. In this respect, paragraph 5.4.1 of the Sept 2011 paper stated that the continuation of an aging population could have serious impacts on services and generally viewed this trend as something that the LDP must address when formulating its strategy and policies. Notwithstanding this, it is notable that despite these concerns, the Council were still content to plan for this trend to continue.</p>

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							<p>However, the situation now seems to have changed with the more recent Topic Paper. The new Topic Paper seems to put a completely different spin on the issue of an aging population, describing it (in paragraph 4.1.34) as being "positive news as it shows an improvement in people's quality of life and improved lifestyles!" So it would seem that the Council is still content to allow the aging population trend to continue, but it no longer seems to be an issue of concern. Indeed, paragraph 4.1.4 of the 2013 Topic Paper acknowledges that the continuation of an aging population forms part of the assumptions underpinning the PBA study. As such, any job growth and housing assumptions that are derived from the study are likely to be constrained by this assumption.</p> <p>We believe the dichotomy in the Council's position on this issue is largely untenable, given that it is clearly necessary to attempt to tackle the rise in non-working aged people, in order to facilitate the LDP's objectives and aspirations for job growth and investment. As such, we are not convinced that the evidence put forward to deviate from the 2008 projections in this regard is sound or robust. Indeed, whilst we accept that even the 2008 WG projection would result in a decline in this age cohort, we certainly do not believe this warrants deviating downwards from these projections. If anything, given the crux of the LDP strategy, the Council should be considering a deviation upwards from the 2008 WG projection, to ensure their strategy for job growth can be supported.</p> <p>2.3 Vacancy Rate</p> <p>We believe the vacancy rate has not been properly considered.</p> <p>There will always be a proportion of the housing stock that remains empty to enable the process of buying, selling and letting to work efficiently, whilst some will be empty to allow repairs and improvement. These vacancies are known as 'transactional vacancies' and most are brought back into use quickly and without intervention. In Wales it is estimated that the effective minimum level of empty homes as a result of these processes is around 4% of the housing stock. The figure varies slightly from local authority to local authority depending on evidence, yet it is noted that through the Pre Deposit LDP, the Council agreed a figure of 5%. Paragraph 5.16.2 of the Population and Housing Topic Paper (Sept 2011) confirms this. However, we understand that Council has now provided more evidence to demonstrate that 4% is reasonable, and therefore we are content with this.</p> <p>Further to the above, paragraph 8.1.8 of the Topic Paper (2013) discusses an Empty Homes Initiative Strategy which aims to bring a number of empty properties back into use for residential purposes. Further to this, paragraph 8.1.9 states that "in order to prevent 'double counting', as any empty units would currently be classified as vacant and would therefore form part of the 4% vacancy rate that currently exists within Neath Port Talbot's housing stock', this figure has been subtracted from the vacancy rate. For example; 320-115 = 205. As a result, the vacancy rate reduces to 3%."</p> <p>We believe the Council has confused the issue here. The Empty Homes Strategy would deal with long term vacancies and not transitional vacancies, which is an entirely different matter. Transitional vacancies are 'required' to help facilitate movement in the housing market and therefore cannot be 'brought back into use permanently' by an empty homes strategy. As such, it is not appropriate to use any assumptions from the Council's empty homes strategy to lower the transitional vacancy rate. If the empty homes strategy did lower this vacancy rate, the housing market would fail to operate in an efficient manner.</p> <p>In light of the above, we believe the vacancy rate should be considered at 4% and not 3%.</p> <p>2.4 Economic Led Projections</p> <p>Paragraph 7.0.5 states that the economic led scenario reflects the demographic changes set out in the 2008 WG projections because it factors in the projected decline in residents of working age population and the reduction in average household size. Indeed, throughout the Chapter 8 it states that the Economic Led Projections are based on the 2008 Population Projections, however paragraph 4.1.60 of the Topic Paper states that for the Economic-led projections a migration assumption of 439 per annum people has been used. In this respect, the migration assumption within the 2008 projections is given as 500 people per annum. This anomaly needs to be explained.</p>

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							<p>In terms of the Economic Led Projections, we accept that it is important to relate job growth to housing growth. However, what the Council seems to have done is constrain housing growth based on assumptions with migration etc, and then used these assumptions to calculate how many jobs will be created over the LDP period. In addition to this, it would seem that the Council is also using data on an aging population within the Economic Led model, which will inevitably reduce the anticipated levels of job growth expected over the LDP period.</p> <p>The Council explains within the Population and Housing Topic Paper that their economic led projections differ from population based projections. However, in our view, instead of taking a balanced view between the two, the Council seems to have completely ignored any population based projections in favour of solely relying on the economic led projections, despite the fact that these projections are based on a declining migration rate and an aging population. This we believe is inappropriate and does not result in a housing requirement based on sound and robust evidence.</p> <p>3. Conclusions</p> <p>Throughout the Population and Background Paper, it is stated that assumptions based on past trends only indicate what may happen should the recent trends continue and that it will be important for the Council to undertake 'policy based' projections to inform the LDP growth strategy. However, in deviating from the projections, the Council has not based its decisions on any policy standpoints. In fact, when the evidence is considered, the Council has merely based its own projections on different time periods in history (when compared to the WG projection), which itself has resulted in a reliance on data that would be result in housing requirement that is contrary to the strategic aims and objectives of the LDP.</p> <p>Further to the above, it is clear that the economic led projections also rely on past trends continuing and are based on assumptions with respect to migration and population age cohorts that would result in a household projection that does not align with the aspirations of the strategic aims and objectives of the LDP. Indeed, from this perspective also, the existence of any 'policy' influences with respect to the decision to deviate from the 2008 projections seems entirely absent.</p> <p>In light of the above, we do not believe the decision to deviate downwards from the 2008 Household Projections is based on sound and robust evidence. In fact, when the evidence is considered, we believe a deviation upwards would probably be more appropriate. However, when all the evidence is considered in the round, we believe the adoption of the household requirement within the 2008 Household Projections (including a 4% increase to account for transitional vacancies) would represent the most appropriate housing requirement for the LDP.</p> <p>4. The need for affordable housing</p> <p>PPW states that an authority's need for affordable housing should place a specific part of the decision to deviate from the latest Household Projections. However, despite the Population and Housing Topic Paper fully recognising this requirement, there is no evidence to demonstrate how the authority's high level of need for affordable housing has directly influenced the decision to deviate from the Household Projections. Indeed, given the viability issues with the current percentage targets (explained in separate representations) and the level of affordable housing need described within the Local Housing Market Assessment, we are perplexed at how the authority could even consider deviation downwards from the 2008 Projections, despite the perceived existence of any additional evidence to warrant such deviation.</p> <p>In light of the above, we believe the level of affordable housing need is yet another example of compelling evidence to demonstrate why the authority should not deviate from the 2008 Household Projections when considering the appropriate housing requirement to be included within Policy SP7.</p> <p>5. Housing Supply</p> <p>We have serious concerns with respect to the land supply in the plan.</p> <p>Firstly, the delivery rates proposed on the larger strategic sites are a concern. We have discussed this issue at length through the</p>

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							<p>JHLAS process and we believe more realism needs to be applied to these delivery rates, in order to ensure the LDP is capable of delivering the numbers proposed on the sites allocated. We believe this will ultimately require further allocations to make up the shortfall when these delivery rates are reconsidered.</p> <p>Secondly, there seems to be a significant reliance on windfall development (over 20%), which clearly reduces the certainty offered by the plan for developers and investors. This needs to be addressed by allocating additional sites for housing development.</p> <p>Thirdly, there is also a heavy reliance on brownfield sites, which will no doubt require significant remediation and lead in times in order to be delivered. In terms of phasing, we are concerned that whilst we wait for the more difficult brownfield allocations to be delivered, the LDP will be left with a shortage of housing land, particularly in the early years of the plan. In light of this, we believe the Council needs to provide robust evidence to ensure the brownfield allocations can be delivered, alongside the other policy and regulatory requirements (both national and local) that will be levied on development sites. The fact that the affordable housing viability assessment purposely omits any additional costs to account for this will clearly be a major issue here. In addition, we also believe the Council should provide a calculation of the land supply position over the LDP period, based on the requirements of TAN 1, in order to ensure the LDP will conform to national guidance on adoption. Given that there will be more information to inform this calculation in the run up to the Examination, we believe it would be sensible for the Council to consider this for discussion at the particular Examination session that addresses issues with regard to Policy SP7.</p> <p>Lastly, the Council has chosen a 13% flexibility allowance for inclusion within the land supply. As such, this will need to be included in addition to the increased housing provision required by the adoption of the 2008 Household Projections. In this respect, given that the Council has chosen 13%, we do not believe the flexibility allowance should be considered at a lower level than this should the housing requirement need to be changed. This is considered in Section 7 below.</p> <p>6. Tests of Soundness</p> <p>6.1 Soundness Test C2</p> <p>We believe the way the housing requirement has been derived does not accord with national guidance. As such, Policy SP7 contravenes Soundness Test C2 and implementing the changes set out below would help to satisfy this soundness test.</p> <p>6.2 Soundness Test CE1</p> <p>We do not believe the strategic aims and objectives of the LDP are suitably aligned with its policies and therefore the LDP does not set out a coherent strategy from which its policies and allocations logically flow. As such, Policy SP7 contravenes Soundness Test CE1 and implementing the changes set out below would help to satisfy this soundness test.</p> <p>6.3 Soundness Test CE2</p> <p>We believe the housing requirement and housing supply targets set out within Policy SP7 are not based on robust and credible evidence and therefore contravene Soundness Test CE2. Implementing the changes set out below would help to satisfy this soundness test.</p> <p>6.4 Soundness Test CE4</p> <p>Policy SP7 does not provide sufficient flexibility in order to ensure the required level of housing development can be accommodated. As such, the policy contravenes Soundness Test CE4 and implementing the changes set out below would help to satisfy this soundness test.</p> <p>7. Suggested changes</p> <p>7.1 Given that the Council are planning to release more evidence to deal with the 2011 Household Projections (scheduled for</p>

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							<p>release in Dec 2013) prior to the Examination in Public, and in light of the requirements of PPW with regard to addressing housing requirements in LDPs, we respectfully reserve the right to comment in full on Policy SP7 through the Examination in Public.</p> <p>7.2 Further to the above, when all the evidence is considered in the round, we believe the adoption of the household requirement within the 2008 Household Projections (including a 4% increase to account for transitional vacancies) would represent the most appropriate housing requirement for the LDP. In terms of figures we believe the housing requirement should be:</p> <ul style="list-style-type: none"> • 2008 Household Projections - 10,066 • 4% Transitional Vacancy Rate - 403 • Dwelling requirement - 10,470 dwellings <p>7.4 In terms of housing supply, on the basis that the dwelling requirement should be 10,470 dwellings, the housing supply, based on a 13% flexibility allowance, should be:</p> <ul style="list-style-type: none"> • Dwelling requirement - 10,470 dwellings • Flexibility allowance (13%) - 1361 dwellings • Total housing land supply - 11,831 dwellings <p>7.5 We believe the vacancy rate should be considered at 4% and not 3%.</p>
Dep825		Natural Resources Wales	748015	Object	Housing Requirement	Policy SP 7	<p>There is objection to the housing requirement of 9150 which is considered to be too low. The total housing requirement is based on a projected increase of in households of 8017 during the plan period 2011 - 2026 which is substantially below the latest 2008 Welsh Household Projections which estimate an increase of approximately 10,000 households over the same period.</p> <p>The justification for departing from the latest household projections is set out in the Population and Housing Topic Paper (August 2013) and is largely due to the assumption that net in migration levels reflect more recent trends and are less than assumed in the latest WG projections which reflected a period of growth and high levels of in migration up to 2008. The Council instead rely on an economic- led projection which is based on more recent trends of lower in migration and household formation which reflect the recent period of economic recession but is at odds with a strategy which seeks to encourage economic growth.</p> <p>The Population and Housing Topic Paper (August 2013) in paragraph 4.2.5 states that the 2011 census based household projections are scheduled to be released in December 2013 which will be addressed through a background paper to supplement the topic paper published prior to the Examination in Public. As these projections will supersede the 2008 projections it will be for the Council to justify any departure from these latest projections.</p> <p>Therefore although we do not consider that the Council has adequately justified the significant departure from the 2008 projections as the next set of household projections will be released before the Examination we reserve our position and request the right to make further submissions when the supplementary background paper is published.</p> <p>The above comments are made in support of the Alternative Site submissions made in respect of:</p> <p>Galltewm Terrace, Bryn</p> <p>Glyn Castle, Resolven</p> <p>South of Tonmawr Road, Tonmawr</p> <p>Heol y Graig, Cwmgwrach</p>
Dep805	Mr	Cuddy Demolition	787651	Object	Housing Requirement	Policy	Increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the

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	M Cuddy	& Dismantling Ltd.				SP 7	<p>contingency provision and reduction in the provision for windfall sites.</p> <p>Consideration of Housing Supply by the Plan</p> <p><i>Overall / Plan-Wide Housing Land Supply</i></p> <p>In regards to the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> • the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. • the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); • the Authority has chosen not to use the "Moderate" growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan. This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. • the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A Growth options summary</p> <p>As the above table confirms, whilst the now proposed dwelling requirement is higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows:</p> <p><i>" The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time." (Paragraph 7.0.8)</i></p> <p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2542</p>		Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	8,227	548	Deposit LDP	8,027	535	Pre-Deposit Moderate Growth Strategy	6,279	419
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							<p>units), it is considered that there will be a significant shortfall in housing provision across the County.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that: <i>"Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them..."</i></p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following: <i>" The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot."</i> (Paragraph 5.0.7)</p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy. In particular, the level of previous development across the County does not necessarily correlate to the level of need and demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>In addition, these projections overplay the impact of the recent recession on future housing requirement, and do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the economic downturn. It is considered likely that a more stable economic situation may result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years may result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period, not just be based on the short term (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority had not maintained a five year land supply since 2007. Whilst the 2011 and 2012 show a supply of 5.8 years and 6 years respectively, this is due to the method of calculation (i.e. based on previous completions) and is therefore not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. This strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement.</p>

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							<p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings. This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Furthermore, when compared with other emerging LDP's in Wales, it is clear that the allocation for 'uplift' has been significantly underprovided for.</p> <p>In particular and so as to evidence and illustrate out case, Torfaen County Borough Council's Deposit LDP provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council have considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. Within the Pembrokeshire County Council Deposit LDP (December 2010) a contingency of 20% is provided for permissions that are not implemented - but in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for efficient and buoyant housing market". It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP.</p> <p>It is noted that in this regard, the Council states the following within the Population and Housing Topic Paper (August 2013): <i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for up to 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market. (Paragraph 7.0.21)</i></p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, as discussed in further detail below, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market.</p> <p><i>Windfall and Small Sites</i></p> <p>Furthermore, it is noted that 23% of Neath Port Talbot's total dwelling supply is comprised of potential development from windfall sites (2085 dwellings from small sites and windfall sites), which relates to approximately 139 dwellings per annum. It is considered significantly un-sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites.</p> <p>In particular, it is noted that within Neath Port Talbot's Population and Housing Topic Paper (2013), an average of 85 units per annum has been identified for large windfall development (on sites over 10 units) over the plan period, with an average of 54</p>

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							<p> dwellings per annum coming forward on small sites over the period for 2001/02 - 2011/2012. Within this average rate of 54 dwellings, this ranges significantly from 5 units per annum, to 130 units per annum. Accordingly, based on these trends, it is not considered that the housing provision on windfall and small sites will be developed anywhere near the level of 139 dwellings per annum anticipated and proposed.</p> <p> Furthermore, it is not considered that the historic rate of windfall and small site developments will be able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller 'pool' of potential windfall and small sites being available. Therefore, as the levels of potential windfall and small sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.</p> <p> In addition, the LDP's provision for windfalls is heavily reliant on large sites (over 10 dwellings) coming forward, with 1,275 dwellings proposed on large windfall sites. It is considered likely that higher numbers of small windfalls sites will come forward in comparison to larger windfall sites which may prove more difficult to find as the 'pool' of sites reduces. Accordingly, the LDP's provision for larger windfall sites needs to be reduced in view of the lower levels of larger sites that are likely to come forward within the Plan period.</p> <p> It is therefore considered that the LDP significantly overestimates the levels of dwellings expected to come forward on both windfall and small sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall and small sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly, the provision for windfall and small sites within the total dwelling supply should be reduced, which further establishes the need for the allocation of additional sites for residential development.</p> <p><i>'Performance' of other LDP's</i></p> <p> Evidence of the failure of LDP Plans to actually yield and deliver supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's Local Development Plan. This Plan, despite having been relatively recently adopted, has failed to ensure an adequate supply of housing land for the County Borough.</p> <p> This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is only a few - 2 - years 'old' - having been adopted in March 2011).</p> <p> The following extract from the 2012 RCT JHLAS is relevant: <i>" The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years"</i></p> <p> In terms of the 'cause' of this undersupply, the following extract is relevant: <i>"This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone"</i></p> <p> Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites: many of which have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites.</p> <p> In any event, the persistent <i>"difficult economic conditions"</i> recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p>

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							<p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, including greenfield sites (as discussed further below), should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded.</p> <p>Assessment of the Spatial Options & Valleys Strategy Area</p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. As stated at Paragraph 2.3.11 and 2.3.12: <i>"The Development Strategy aims to: Facilitate growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities.</i></p> <p><i>This means: Identifying Pontardawe and the Upper Neath Valley as strategic growth areas in the Valleys".</i> This strategy is supported, as it recognises the need to achieve a balance in terms of housing provision, whilst ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p> <p>The LDP strategy seeks to reinvigorate the Valleys principally through the identification of two growth areas i.e. Pontardawe and the Upper Neath Valley. As set out within Paragraph 2.5.3, within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements where appropriate growth should be focused: <i>"Within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements in which to focus development to ensure benefits of growth and regeneration are shared more widely throughout the valley communities".</i></p> <p>The sustainability credentials of the settlement of Glynneath in particular are outlined in Paragraph 4.0.30 of the Deposit LDP: <i>"Glynneath is the key settlement in the upper Neath Valley and has good links to the upper Dulais Valley and the Brecon Beacons National Park as well as to Neath and the Coastal Corridor Strategy Area via the A465 (T) Dual Carriageway. Significant growth in the Glynneath Area / Upper Neath Valley will therefore benefit the wider area and enhance the sustainability and attractiveness of both Glynneath and Resolven".</i></p> <p>Although Glynneath is identified as a Strategic Growth Area, it is not considered that a high enough level of housing is focused within the settlement of Glynneath to achieve the significant levels of growth and development that is anticipated (i.e. as required to generate the associated positive impacts in terms of the benefits of regeneration more widely).</p> <p>It is considered that a more equitable allocation of housing within the two key settlements identified as most appropriate within the Valleys (i.e. Pontardawe and Glynneath) is required in order to ensure that the benefits of growth are distributed evenly throughout the Valleys area. Although Glynneath is identified as a Strategic Growth Area there are only a total of 4 housing sites allocated - such a low level of housing provision within this Strategic Growth Area is considered to jeopardise the aims of the LDP strategy.</p> <p>Within Pontardawe, a total of 614 dwellings are allocated. However, less than half this number of dwellings are allocated in Glynneath (i.e. a total of just 264 dwellings are allocated over the plan period).</p> <p>The largest housing allocation within Glynneath is at Park Avenue. The deliverability of the residential units at this site (particularly in the short to medium terms) is considered doubtful, as the housing allocation forms part of the wider Park Avenue Mixed Use Regeneration Scheme. The scheme relies on the collaboration of a number of parties (both public and private sector)</p>

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							<p>and is considered unlikely to come forward over the short to medium term - thereby further reducing the availability of new housing in the Glynneath area.</p> <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan subject to these representations, and which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement - increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and reduction in the provision for windfall sites. • Policy H1 Housing Sites - allocation of Alternative Site (Land at Chain Road) as a residential development site. • Policy SC 1 Settlement Limits - amendment of the settlement limits at Glynneath to include the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep844		Ryehill Properties (Wales) Ltd.	787653	Object	Housing Requirement	Policy SP 7	<p>We object to Policy SP7 because it does not comply with the following tests of soundness: Test C2 - It has regard to national policy; Test C3 - It has regard to the Wales Spatial Plan; Test CE1 - Coherent Strategy; and Test CE2 - Strategy, policies and allocations are realistic</p> <p>The Council state that the housing requirement is based on the Welsh Government's Household Projections 2008 taking into account the economic objectives over the plan period. However, despite increasing the housing requirement from the Preferred Strategy, the requirement for 9,150 homes is 1,257 units below the requirement of 10,407 homes identified by the Welsh Government's Household Projections. It is stated in paragraph 2.0.11 of Population and Housing Trends Topic Paper, August 2013 that: <i>'Neath Port Talbot's growth strategy is now underpinned by projected levels of economic growth (nationally driven but also influenced and adjusted to take into account the local economy including proposed regeneration strategies). This economic led scenario reflects the demographic changes set out in the 2008 WG projections because it factors in the projected decline in residents of working age population and the reduction in average household size'</i></p> <p>It is considered that basing the housing requirement solely on achieving the economic objectives of the LDP, does not comply with the requirements of Planning Policy Wales with paragraph 9.2.2 stating that: <i>'The latest Assembly Government local authority level Housing Projections for Wales should form the starting point for assessing housing requirements. Household projections provide estimates for the future numbers of households and are based on population projections and assumptions about household composition and characteristics. ...Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy -based projections by explaining the rationale behind them in terms of the issues listed at paragraph 9.2.1 above.'</i></p> <p>By identifying a housing requirement of 9,150 homes, no allowance is made for flexibility or choice in accordance with paragraph 9.1.1 of PPW which identifies the need to give people greater choice over the type and location of housing they live in. An over allocation of 10% is considered reasonable to aid the delivery of the required housing provision within the plan period. Therefore, based on the Welsh Household Projections, 11,447 homes should be identified as the requirement within Policy SP7.</p> <p>In terms of the contribution from windfall sites, the Council has chosen to forward project an annual build rate of 85 units per annum, whilst over the period 2001 to 2011 the contribution from windfall sites equated to only 54 units per annum. It is unclear how the Council envisage 85 units per annum being delivered over the LDP period, which equates to 23% of the identified requirement. Windfall sites are not a finite resource and the delivery of such sites cannot be guaranteed to ensure that sufficient housing is delivered over the plan period. Furthermore, a further 810 units (9%) are to be delivered on small sites. The deliverability of housing units through small sites is less certain than the deliverability of housing on allocated sites. Whilst it is accepted that the housing market will inevitably recover from its current depressed state, house prices are not expected to recover to their previous highs. This will impact upon overall housing viability. Therefore the contribution from windfall is likely to fall</p>

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							<p>as larger schemes are required to ensure development viability. This situation questions the soundness of the plan to deliver the necessary houses to meet the social, economic and housing needs of the County with an over-reliance upon windfalls and such sites with the housing provision.</p> <p>Therefore in order to make the plan sound:</p> <ul style="list-style-type: none"> • The housing requirement needs to be based on the Welsh Household Projections and include at least a 10% flexibility allowance, which equates to a requirement for 11,447 homes over the plan period. • The contribution from windfall and small sites should be reduced, with additional allocations being made within the LDP. • Land at Sarnfarn, Dinas Baglan Road, Baglan should be allocated for 78 units under Policy H1.
Dep1101	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	Housing Requirement	Policy SP 7	<p>The enclosed report, 'Neath Port Talbot Local Development Plan, Representations: Coed Darcy, October 2013) provides detailed comments on Policy SP7 (see sections 4 and 5).</p> <p>In summary, the report explains why the proposed level of growth (and number of housing units required) in the plan should be reduced. Policy SP7, as currently drafted, risk significant over allocation of housing land and this has important and unintended consequences. There are much better approaches available and specific attention should be given to the WG 2011-based population and household projections. These will allow the Council to establish a much more sensible but no less ambitious housing land target.</p> <p>We have reviewed the Peter Brett Associates (PBA) study (which was not available when the LDP Deposit Plan Proposals Report was consulted on) and the updated Population and Housing Topic Paper (August 2013). Together, these documents describe the plans revised development strategy and this section summarises the fundamental concerns we have them (and principally with the level of growth they propose).</p> <p>Spatial Strategy</p> <p>As outlined in our representations on the Pre-deposit Proposals, a spatial strategy that would continue the UDP Strategy is our favoured option as it would direct development to key urban regeneration sites and to areas which are already home to a high proportion of the population. In principle and notwithstanding the growth level that come with it, the proposed preferred spatial strategy can be broadly supported. The direct and firm references to Coed Darcy as providing an 'anchor' for proposed growth are particularly welcome.</p> <p>The basic logic behind this spatial strategy is also supported as it will continue to follow and shape market forces which focus housing, employment and commercial development along the M4 corridor. This 'Coastal Corridor' strategy area contains the main centres of population, infrastructure and facilities, and benefits from easy access to the M4. These factors make the area more attractive in terms of investment for business, commercial and residential development. In this context, the DLDP's preferred Spatial Strategy is considered robust, appropriate and ambitious.</p> <p>Level of Growth</p> <p>Whilst the spatial strategy is supported, we have a number of serious concerns about the level of growth and number of dwellings proposed in the DLP. These are explained below and follow a number of key connected issues:</p> <ol style="list-style-type: none"> a) The Council's rationale for deviating from the 2008-based projections and the change in level of growth since that proposed in the Pre-deposit LDP Proposals; b) The use of the employment-led strategy, as proposed and justified by PBA; and c) The potential implications of the 2011-based projections on the proposed level of growth. <p><i>The need for deviation from the 2008-based WG Projections</i></p>

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							<p>It is very clear that the driver for the very high level of growth proposed as the 2008 based Household Projections and the WG's request that they should be followed. Most significantly, WG made a number of comments on the much more sensible proposed level of growth in the Pre-Deposit Proposals (in 2011), claiming that the 'moderate' proposed level of growth was unacceptable. The WG indicated that this was a 'massive decrease' from the 2008-based population projections (which suggests that 10,569 new units would be required between 2011-2026, or 705 units per annum). The Council had, in the Pre-Deposit Proposals, referred to past build rates as the reason for this deviation from these WG projections, which were defined in the Pre-Deposit Proposals as 'very high growth' and a clearly unrealistic option.</p> <p>Notwithstanding this, the WG, in its comments on the Pre-deposit Proposals asked the Council to better explain its position. The WG's request relies on PPW which advises that household projections should form the starting point for assessing housing requirements and requires LPA's to consider the appropriateness of the projections for their area, based upon all sources of local evidence. PPW recognises that there is scope for deviation from the WG projections, providing they are fully justified in terms of the issues listed in paragraph 9.2.1 of PPW - which include the WG's latest household projections, local housing needs and strategies and social considerations.</p> <p>In our view, the reason for the deviation was clear. It is explained in the 2011 Pre-Deposit Proposals report where it is stated that the high growth option, in accordance with the WG 2008 projections, would require a rate of house building significantly higher than has been achieved in the past. The Council was correct in its observation that such a high level of growth would be 'unrealistic and undeliverable'. The Council was also correct that this option should be discounted on the basis that development of this scale could result in an unsustainable pattern of development.</p> <p>There was therefore a significant difference between the WG's and Council's preferred level of growth - and the Council was clearly under pressure to raise growth levels to match WG household projections.</p> <p>The Council could have responded by agreeing that the WG projections and forecasting provide the 'starting point' for assessing housing projections. In some areas, the level of growth proposed does align closely with WG household projections and can and should be delivered. However, it could also then have said that this does not mean that they are fixed and 'hard and fast' indications of the level of growth for the authority they refer to. As identified in PPW, there are a number of other factors that must be taken into account. The strategy should be appropriate to, and accord with local objectives, characteristics, needs, demands and realities - in this case, in Neath Port Talbot. Moreover, in this instance, the 2008-based figures were so high for Neath Port Talbot that they were obviously flawed and wrong - a fact clearly proven by the more recent and census based 2011 projections.</p> <p>Rather than make this case, the Council commissioned PBA to re-consider the proposed level of growth based on the Swansea Bay region's economic growth potential. It is clear, from the language used in the topic paper, that this exercise and change in approach was led by the WG comments and the intent to 'conform' with the WG's view that the 2008-based projections were used as the starting point for the consideration of housing requirements. There are a number of references in the topic paper to this need for conformity with WG projections, which is established in paragraph 9.2.2 of PPW.</p> <p><i>Concerns with the employment-led strategy</i></p> <p>The Council employment-led strategy continues to propose a level of growth that deviates from the 2008-based projections. As set out below however, there are significant concerns with the employment-led approach that would suggest that the proposed level of growth the DLDP is still too high.</p> <p>This is a shame because the report's starting points are clearly relevant: additional housing is needed to attract people to move to the area to access jobs, education and attractive housing and to retain people who are already present. Additional housing is also needed to enable households to down-size or access accommodation better suited to their needs. The need to align employment growth (and the amount of employment land to be allocated) and population growth (and the amount to housing land to be allocated) can be appropriate too. Aspirations for economic growth are supported as well - but at the right level that is realistic and does not risk the damaging and unforeseen consequences.</p>

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							<p>Here though these points do not trigger the need to depart from a 'traditional' approach to identifying the needed for housing which should rely on natural change, migration and household formation. This is because of the amount of uncertainty and number of assumptions made on the level of economic growth needed continue to make PBA conclusions an unreliable and inappropriate base for housing strategy.</p> <p>There are a number of reasons for that. On one level, PBA recognises in its report that there is likely to be limited public (and private funding) for development, (and as a result, PBA concludes that the Council should identify clear priorities, favouring the strategic allocation of sites requiring the least intervention).</p> <p>The PBA report relies on EE base employment forecasts, which are adjusted to consider the impact of higher growth. The economic-led scenarios also make the following assumptions:</p> <ul style="list-style-type: none"> • Unemployment rates will fall to the Welsh average of 6.5% for the period 2004-2011; • Economic activity rates will increase to the Welsh long term average of 73% over 2004-2011, which will require targeted interventions to support residents into work; • Intervention should be focussed on providing for a range of business unit sizes through creating a premises 'ladder' within future strategically allocated site; • Sufficient European Structural Funds will be available to unlock economic growth - to support the proposed level of growth. At the moment, the amount of Structural Funds committed to the County and the projects it should prioritise and support is unknown; • As NPT is not an identified economic hub, the role of partnership working with Swansea and other neighbouring authorities, takes increased importance - especially since NPT currently has viewed jobs and a relatively low self-containment rate; • The PBA report notes that past legacies have left a relatively poor skilled workforce, especially for the more modern growth sectors which are likely to emerge in the County, and therefore the employment-led growth strategy relies on significant institutional training for employment requiring a different skill-set (i.e. the knowledge based economy); and • PBA recognise that forecasts can fail to pick up on significant local demand factors relating to specific sector investments, which need to be checked. PBA highlight the miss-alignment in the EE employment forecasts with what is happening at the local level, in relation to Tata (see below). <p>PBA also highlight the lack of consistency between the EE forecasts. The EE forecasts show a substantial drop in the 'metal products' and 'specialised construction activities' sectors. However, Tata Steel, one of the County's largest investors and employers, and considered within the 'metal product' sector, are said by PBA to be increasing its investment and so it is not expected to top macro trends forecasted to apply in this sector. In addition, the 72% drop in 'specialised construction activities' is not discounted because investment in infrastructure such as the PDR and regeneration of Port Talbot is assumed to continue across the plan period.</p> <p>These are important assumptions and need to be tested. As a benchmark of the EE forecasting used, we have considered the Oxford Economics (OE) data for employment growth in NPT. Whilst the divisions in sectors do not match, OE indicates much lower forecasts for total employment. Between 2010 and 2025, OE forecasts indicate that the number of people employed in manufacturing is to decline by 0.8% and the number of people employed in construction is to decline by 0.6%. These compare with much higher rates applied by PBA.</p> <p>As stated above, unless the DLDP approach is changed, getting these forecasts right is critical as the employment-led strategy relies on significant growth in the amount of employment to justify new housing. However, we consider that this cannot be done as the economy remains in one of its most unpredictable states in living memory. As an example, various sources suggest that the tough economic climate in Europe has resulted in a decline in steel demand by about a third since the start of the financial crisis. Tata has reported that these tough conditions are likely to persist in the 'near to medium' term. This resulted in almost 600 jobs being cut in South Wales in November 2012. We take no delight in these figures - they simply underline the difficulty in making reliable predictions of economic conditions especially if they are based on substantial levels of growth.</p>

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							<p><i>Implications of 2011 based projections</i></p> <p>The solution to this problem is relatively straight forward, and comes from the Population and Housing Topic Paper which refers to the release of the 2011 Census populations. Although these will not be released until the end of 2013, the Council describes these as more contemporary and highlight current growth requirements much more effectively. As a result and even if the 2011 household projections are the latest available as these comments (and the DLDP) were written, there is much we can learn from the population projections in the meantime. These lessons are obvious and the topic paper identifies the known, early implications of the 2011 Census data.</p> <p>At a basic level, the 2011-based projections show that population growth will be ‘much lower’ (topic paper, para 4.2.6) than the 2008-based projections. The 2011-based population projections predict that the percentage change in total population in the County Borough between 2011 and 2033 has fallen from an 8% increase of 11,700 additional people using the 2008-based projections to a 5% increase of 2,500 additional people using the 2011-based projections. Within the plan period (up to 2026), the 2011-based projections suggest that the population will increase to 142,700. This compares to 148,038 as projected in the 2008-based figures. The 2011-based population projections therefore suggest that the County Borough will grow by 5,338 less people than anticipated in the 2008-based figures. The projections also indicate a declining population from 2028.</p> <p>The topic paper (para 4.1.52) is clear on the contrasts between the 2008 and 2011 based projections. It attributes these to the lower migration assumptions used which are considered to be more realistic with current trends due to the state of the economy and a greater number of deaths over births, which is common in an aging population. The Council, in the topic paper, recognises that the 2008-based in migration figure of 500 people per year is due to a high level of migration between 2002 and 2006 and therefore the 2011 projections, which use a different period, are more realistic. The 2011-based projections suggest that migration will increase population by 190 each year .</p> <p>Although the Council appears to accept this level of migration, the level of growth is based on a significantly higher net migration that relies on a number of assumptions. It is noted that the 2008-based migration projection does reflect the poor economic climate and there may be some flexibility to support a higher projection to allow for ambition and an improvement to the economy. However, the Council's contention that net migration will be around 439 people is unsound and evidence based is clearly flawed. The Council's approach and reasoning for this high level of growth proposed in the DLDP is clearly driven by net migration - which in turn, supports the ambitious economic-led projections.</p> <p>The Council assumes that, over and above the projected / forecasted migration (2011 figures) of 190 people, an additional 249 people (net) a year will reside in the Authority as a result of an assumed (strong) economic recovery, enlarged EU and the increase internal migrants moving to the Authority for affordable housing.</p> <p>Migration is a complex aspect of population components of change and is noted to be subject to a variety of political, economic and social influences. In some cases, economic interventions will have a positive impact on population growth - however, such interventions will be of a varying degree of success, depending on how effective economic incentives to increase job generation (and therefore population) are, and how well politically-backed or publicly funded they are.</p> <p>We agree that the LDP should plan for improvement to the economy - St. Modwen's projects will help to drive that growth. Our fundamental concern relates to the level of economic growth and intervention relied upon to achieve a net migration assumption of 439 people. As stated above, the topic paper, and PBA's report, makes strong assumptions about the an improved local economy, an enlarged EU and more internal migrants moving to the County Borough - without any robust evidence to support these assumptions. As a result, the level of growth proposed has an extremely fragile base.</p> <p>Summary</p> <p>Whilst its spatial strategy is good, the level of growth is fundamentally wrong. This is caused by the science behind the level of growth which is unsound, no matter how laudable the Council's basic objectives are or the criticisms it is responding to. There is</p>

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							<p>also no check on that science - it clearly proposes a rate of activity and development that will not be delivered no matter how hard everyone tries.</p> <p>Nor is there any real analysis of the implications. These are clear from an assessment of the number of the DLDP and its new allocations (and their location) which are considered in the following dwelling proposed section.</p> <p>Consequences of New Site Allocations</p> <p>The consequences of the level of growth that the DLDP currently proposes are serious and significant. This is because they feed a series of land allocations for new housing which could upset or confuse a still fragile and stretched market, jeopardise the delivery of key regeneration objectives and projects and lead to an uncontrolled and unsustainable level and pattern of growth. We are sure that these are not the intentions of either the plan or the Council (and go, in fact, to the desire to appease the WG). However, for the reasons described in this section, they could be the consequences of the plan if it is left as it is.</p> <p>The scale of allocations, market capacity and rates of growth</p> <p>The headline allocation figure for new housing is 9,150 additional dwellings. This requires the plan (in Policy H1) to identify land for an additional 3,128 new dwellings (over and above existing commitments). Some sites are rolled over from the last UDP (which does not automatically make them good sites) but there are many new ones too (as identified later in this section). A lot of these are new greenfield sites and because the Council wants to try and keep to its broad locational strategy, these greenfield sites are alongside or near to key regeneration initiatives or areas of brownfield land.</p> <p>The scale of this release causes substantial alarm for a number of reasons. This is because it is at odds with the recognised development capacity of the house building industry in the area - both locally and regionally. It is so much higher (and goes well beyond what can be described as step change) that it is in fact likely to frustrate house building or delivery of infrastructure rather than accelerate or improve it.</p> <p>This is basic development economics and will occur because of a clear imbalance in supply and demand for sites and homes. It will dilute value and will either discourage land sales or significantly reduce the scope for development to fund essential infrastructure and planning gain. Developers will take positions on multiple sites and then negotiate terms based on a clear situation of oversupply. This could delay development or make it uneconomic or mean that some sites are in fact taken off the market.</p> <p>This is a real risk. The proposed level of growth - 610 dwellings per year - requires annual growth at a level not ever realised by the Council before . Past build rates are significantly lower: the 10 year average (2001-2011) is 340 dwellings per annum and the highest rate achieved was in 2010/11 when 411 units were built. This figure indicates the maximum build capacity of the County Borough, at a time where there was an injection of Social Housing Grant (SHG) funding and initiatives by house builders to complete sites and dwellings (para A.0.6, page 132, Pre-deposit LDP 2011). This indicates that, even when there is significant government funding to accelerate development, the highest rate per annum that has been achieved is 411, some 200 units less than the level of growth proposed each and every year in the DLDP.</p> <p>In this light, the DLDP has the potential to be very harmful. In its (2011) pre-deposit form the plan was much sounder - by aiming for about 400 dwellings per year, it was appropriate and realistic, yet was still ambitious and focused on projects that were important for a variety of reasons. This sensible approach to delivery appears to have been abandoned in the DLDP.</p> <p>It is difficult to see why this has happened or why there has been no reality check on what the plan proposes. Swansea Council - NPT's neighbour which jointly commissioned the PBA report - recognises the need for one. Its preferred level of housing growth, whilst still in excess of the annual completion trends over the last decade, is in line with the peak previous provision (which took place during boom times and relies on a lot of flatted development).</p> <p>Higher growth options considered by Swansea Council, which accord with the WG's 2008-based projections, were rejected on the</p>

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							<p>grounds that the rate of population increase would be well in excess of that recorded over the last decade. In addition - and as stated above - the number of dwellings required to house the population increase would be significantly higher than the number of completions in the County even in the peak year of the last decade. In this light it is clear that Swansea Council recognised the 'serious question marks over the practicality for developers to build this number [very high] of homes during a 15-year period' (Swansea LDP, Preferred Strategy, June 2013, para 4.12).</p> <p>Swansea Council also warns of the risk that over-provision of housing would lead to increase commuting to jobs in neighbouring areas and could undermine regeneration objectives in other parts of the City Region. These concerns are also relevant to NPT - however, NPTCBC has not tested the high level growth option against these potential risks and implications.</p> <p>It is also important to note that despite this check on housing numbers, a significant amount of growth, including substantial urban extensions and new settlements is proposed in the Swansea LDP. This new development has the potential to further saturate the Swansea Bay housing market area which includes the main coastal area of Neath Port Talbot - exacerbating the concerns raised at the beginning of this section.</p> <p>The plan's impact could also, perversely, see event those sites which were not allocated come forward. This is because, by setting a very high target for housing in its LDP, the Council will establish a high requirement for its five year supply of land for housing. Because allocated sites may be delayed or mothballed, it will be argued that further releases may need to be made to boost the supply and this may open the door for sites to come forward which have been rejected - but which may be even less sustainable.</p> <p>The potential for this already clear. The statement of common ground that has recently been submitted for the 2013 Joint Housing Land Availability Study makes the position on delivery very clear. For the first two years of the plan period, under 300 dwellings have been completed - less than half what would be required if the LDP's growth level is adopted. Already then 600 units have to be added to the remaining years. However, if it is adopted the development level will also drive the annual five year supply requirement. If that cannot be satisfied by allocated sites (and we are sure that it cannot) then the five year supply will be deficient leaving the Council very vulnerable at appeal.</p> <p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p>

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							<p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p> <p>Implications on Sustainability</p> <p>The combination of a very high of growth and an absence of any phasing or control raises implications for sustainability too. On one level - as set out above - it means that new greenfield sites, in areas with no infrastructure plan or strategy, could be developed instead of true regeneration initiatives which have been properly considered, follow a clear strategy, and deliver substantial economic benefit</p> <p>However, it also goes to a much more fundamental test of the LDP's soundness - namely the Council's Sustainability Appraisal (SA) of the plan and the growth options. The DLDP proposes that 610 dwellings (accounting for flexibility) are built per annum and therefore falls within the 'high growth' option considered at the Pre-deposit Proposals stage. The assessment of this level of growth (see table 2.1.1. of the 'growth options' background paper to the Pre-deposit LDP SA) indicates that the 'high growth' option will trigger a number of negative or significantly negative effects in terms of sustainability.</p> <p>The Pre-deposit LDP SA described the high and very high growth options as having <i>'generally more extreme scores, doing well for some aspects of health and wellbeing and the economy, but significantly badly for environmental issues and some social and economic indicators'</i> (para 7.4.1.8). This SA concluded that the 'moderate' growth option was the most effective balance of economic, social and environmental effects.</p> <p>In comparison to the firm and relatively objective conclusions made on growth options in the Pre-deposit LDP SA, the SA for the DLDP clearly finds it difficult to justify the consequences of the amended strategy in terms of the sustainability objectives (and a series of negative and significant negative effects are triggered by the 'high growth' option).</p> <p>The DLDP SA, in paragraph 7.4.1.2, also suggests that due to the strategic level of the options (proposed at the Pre-Deposit LDP stage), there are significant uncertainties about the effects of the differing growth levels since the details and implications cannot be fully known for all the alternatives. This explains why the analysis given can only be vague and the SA fails to recognise that there are feasible alternatives to the revised high level of growth proposed. Furthermore, as explained above, there is a risk that the assumed positive economic and social effects are not realised (and in fact inhibited). As a result, the proposed employment-led strategy could actually backfire (taking the benefits which balance any environmental harm with it). This would make even the DLDP SA much less clear in terms of the performance of the DLDP or its implications.</p> <p>Summary</p> <p>These last points emphasise wider concerns about the performance of the plan and its impact. It is clear that these all go to (or come from) a level of growth that the Council feels that it has to plan for (rather than a level that it knows is appropriate and can -</p>

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							<p>with realistic levels of ambition and effort - be accommodated). The effects of this level are clear and are largely undisputed - because it plans for development rates in each and every plan year that have never been achieved (in any preceding year), the plan cannot be delivered and is not realistic. The strategy then fails the key tests it must pass, risks confusing the market (especially given its neighbours ambitions) and could stifle sustainable growth and economic progress.</p> <p>The evidence that the level of growth is based on is particularly fragile and points clearly to the Council being in the position to set its own levels (regardless of direction from WG). Helpfully, if these levels return to those set out in the 2011 Pre-Deposit LDP, then they will align reasonably closely with the 2011 based population projections (and the household projections they will inform). In this way the plan can be simply corrected with a development strategy that is still ambitious, but which is realistic and sustainable as well.</p>
Dep828		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Housing Requirement	Policy SP 7	<p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects

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							<p>over the Plan period.</p> <ul style="list-style-type: none"> • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Consideration of Housing Supply by the Plan</p> <p><i>Overall / Plan-Wide Housing Land Supply</i></p> <p>In terms of the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> • the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Deposit Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. • the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan (October 2012) which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); • the Authority has chosen not to use the "Moderate growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan (September 2011). This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. • the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT																				
							<table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008 Projections</td> <td>May 2010</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>October 2012</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>August 2013</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>September 2011</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A: Growth Options Summary</p> <p>As the above table confirms, whilst the dwelling requirement in the Deposit Plan is now higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and is well below the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows: <i>"The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time."</i> (Paragraph 7.0.8)</p> <p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period.</p> <p>Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2542 units), it is considered that there will be a significant shortfall in housing provision across the County over the plan period.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that:</p> <p><i>"Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them..."</i></p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following:</p> <p><i>"The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot."</i> (Paragraph 5.0.7)</p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time and respond to the improving global and UK economic situation.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy of</p>		Date	Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008 Projections	May 2010	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	October 2012	8,227	548	Deposit LDP	August 2013	8,027	535	Pre-Deposit Moderate Growth Strategy	September 2011	6,279	419
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Pre-Deposit Moderate Growth Strategy	September 2011	6,279	419																								

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							<p>the Deposit LDP. In particular, the level of previous and historic development across the County does not necessarily correlate with the current and future level of development demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>Importantly, the Deposit Plan housing projections do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the recent economic downturn and recession. It is considered that a more stable economic situation which is now beginning to emerge will result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years will likely result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, this latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period and should not just be based on the short term historic situation (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority has not maintained a five year land supply since 2007. Whilst the 2011 and 2012 Assessments show a supply of 5.8 years and 6 years respectively, this is considered to be due to the method of calculation (i.e. based on previous completions) and is not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. The Deposit Plan strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement and does not provide the basic means of facilitating economic growth and stimulation that will be required over the plan period.</p> <p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings.</p> <p>This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Importantly, when compared with other emerging LDP's in Wales, it is clear that the allowance for 'uplift' is significantly underprovided.</p> <p>By way of evidencing this point, Torfaen County Borough Council's Deposit LDP (March 2011) provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council has considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. In particular, the adopted Pembrokeshire LDP (February 2013), provides for a total housing supply which is</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>28% higher than their assessed housing requirement for the period. The total Housing Supply for the County over the plan period therefore includes a contingency of circa 20% for permissions that are not implemented - and in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for an efficient and buoyant housing market". Within the Inspector's Report for the Pembrokeshire LDP (2013), the Inspector states the following in regards to the proposed housing supply:</p> <p><i>"The actual housing supply figure ... is some 30% higher than the housing requirement. ... In my view this level of over-supply is acceptable, having regard to the number of existing planning permissions that are unlikely to be implemented and the fact that some allocations will not be taken up, particularly if current market conditions continue well into the Plan period. In addition over-supply will assist in ensuring a 5 year housing land supply, gives a choice of sites to both developers and households in testing times and is likely to deliver more affordable housing. The PCNPA has also over-provided for housing in its LDP. ..."</i> (Paragraph 7.2)</p> <p>It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP. Such a contingency would provide the required policy context to facilitate growth and improve prosperity of the plan area.</p> <p>In terms of the Neath Port Talbot Deposit LDP housing contingency, it is noted the Council states the following within the Population and Housing Topic Paper (August 2013):</p> <p><i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for upto 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market.</i> (Paragraph 7.0.21)</p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, as discussed in further detail below, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market and meets future requirements by providing sufficient scope for new housing in the right locations that people will want to live.</p> <p><i>Windfall and Small Sites</i></p> <p>It is noted that 23% of Neath Port Talbot's total dwelling supply is comprised of potential development from windfall sites (2085 dwellings from small sites and windfall sites). This relates to approximately 139 dwellings per annum. Such a high reliance on windfall sites is considered to be inappropriate and unjustified, particularly in view of recent development rates on windfall sites.</p> <p>In particular, it is noted that within Neath Port Talbot's Population and Housing Topic Paper (2013), an average of 85 units per annum has been identified for large windfall development (on sites over 10 units) over the plan period, with an average of 54 dwellings per annum coming forward on small sites over the period for 2001/02 - 2011/2012. Within this average rate of 54 dwellings, this ranges significantly from 5 units per annum, to 130 units per annum. Accordingly, based on these trends, it is not considered that the housing provision on windfall and small sites will be developed anywhere near the level of 139 dwellings per annum anticipated and proposed in the Deposit plan calculations.</p>

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							<p>Furthermore, it is not considered that the historic rate of windfall and small site developments will be able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years. This has, and will continue to, resulted in a smaller ever diminishing 'pool' of potential windfall and small sites being available. Therefore, as the levels of potential windfall and small sites significantly diminish, the rate of development on such sites is likely to slow dramatically, as such deliverable sites simply become less available.</p> <p>In addition, the LDP's provision for windfalls is heavily reliant on large sites (over 10 dwellings) coming forward, with 1,275 dwellings proposed on large windfall sites. It is considered likely that higher numbers of small windfalls sites will come forward in comparison to larger windfall sites which may prove more difficult to find as the 'pool' of sites reduces. Accordingly, the LDP's reliance on larger windfall sites needs to be reduced in view of the lower levels of larger sites that are likely to come forward within the Plan period.</p> <p>It is therefore considered that the LDP significantly overestimates the levels of dwellings expected to come forward on both windfall and small sites within the LDP. Such a situation is likely to result in an under provision in the total dwelling supply and will restrict the ability of the LDP to provide for the housing needs of the local population over the plan period. Accordingly, the provision for windfall and small sites within the total dwelling supply should be reduced, with a consequential identification of further suitable and deliverable sites for residential development.</p> <p><i>'Performance' of other LDP's Across Wales</i></p> <p>Evidence of the failure of adopted LDP's to actually yield and deliver the envisaged and required housing supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's LDP. This Plan, despite having been relatively recently adopted in March 2011, has failed to ensure an adequate supply of housing land for the County Borough since its adoption.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) which records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is -only 2 years 'old').</p> <p>The following extract from the 2012 RCT JHLAS is relevant:</p> <p><i>"The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years"</i></p> <p>In terms of the 'cause' of this undersupply, the following extract is relevant:</p> <p><i>"This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone"</i></p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites. Many of these have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites to ensure that there is a ready supply of deliverable housing land to meet forecast demand requirements.</p> <p>In any event, the persistent <i>"difficult economic conditions"</i> recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p> <p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to</p>

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							<p>undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered - a position which has been endorsed by Members at Caerphilly's Cabinet Meeting on 2nd October 2013 and Council Meeting on 8th October 2013. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area, and will also potentially increase the delivery of affordable housing.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, including suitable and deliverable greenfield sites (as discussed further below), should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded. This will ensure that the NPT LDP will be a robust plan that can meet the housing demands of the area and stimulate economic growth and prosperity.</p> <p>Assessment of the Spatial Options</p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. In doing so, the strategy:</p> <p><i>"...focuses on the Coastal Corridor and Valley areas within a different context to reflect their varying potential to accommodate new development."</i> (Deposit LDP paragraph 2.5.7).</p> <p>In doing so, the Deposit Plan acknowledges that the 'majority of investment will continue to be along the M4 corridor'. This strategy is broadly supported, as it recognises the need to achieve a balance in terms of housing provision, and in particular to focus new development in the M4 corridor, whilst at the same time ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p> <p>It is also noted that a mixture of brownfield and greenfield sites will make up the housing supply, as confirmed within the Deposit Plan as follows:</p> <p><i>"The housing supply within Neath and Port Talbot will be made up of brownfield re-development, greenfield sites and existing commitments, with the regeneration of brownfield land being balanced against the release of greenfield areas. In releasing sites for development, the strategy provides sufficient and viable housing sites that seek to maximise the potential to achieve affordable housing."</i> (Deposit LDP, paragraph 2.5.22)</p> <p>Support is given to the Plan's recognition that both brownfield and greenfield sites have a role to play in providing a range of sites and choices that can provide for the Council's housing supply. However, it should be noted that an appropriate balance between the two is required, in order to ensure that sites are brought forward for development. In particular, brownfield sites generally have greater site constraints and can often be associated with significant remediation costs. This can have significant impacts on the viability and deliverability of developments, and can lead to a significant reduction in the ability of the site to contribute towards planning obligations such as affordable housing etc.</p> <p>Accordingly, in order to balance this, a greater range of greenfield sites should be allocated within the Plan in order to ensure the deliverability of sites, and also to provide greater likelihood for developer contributions - particularly for the provision of affordable housing. An appropriate balance between brownfield and greenfield site allocations therefore needs to be provided, with consideration given to allocating additional greenfield sites in order to meet the overall shortfall and to aid delivery of housing development.</p> <p>Assessment of Port Talbot Spatial Strategy</p> <p>Within the Deposit LDP, it is noted that 27.2% (2460 dwellings) of the total housing requirement is directed to Port Talbot. General support is given to this 'weighting' of housing numbers, as it recognises the importance of the Port Talbot area as an area</p>

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							<p>where growth should be focussed. It is however observed that the 48.4% allocated to the Neath spatial area is significantly higher than Port Talbot. We consider that a more equitable split would be appropriate.</p> <p>Furthermore, it is noted that the Deposit LDP directs a lower proportion of housing numbers to the Port Talbot area in comparison to the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012). In particular, within the Stakeholder Proposals Report (October 2012), 32.9% of the total housing requirements were directed to the Port Talbot area, which represented a total of 2918 dwellings. The current Deposit Plan therefore directs over 450 less dwellings to the Port Talbot area than the previous version of the Plan.</p> <p>This reduction in the proposed housing provision for Port Talbot is considered to represent a material difference, which is likely to result in the housing needs of the Port Talbot area going unmet over the plan period. Accordingly, an increase in the housing numbers directed to Port Talbot is required in order to ensure that the Plan adequately provides for the needs and requirements of the spatial area - a spatial area</p> <p>In terms of the housing supply for Port Talbot, it is noted that this is comprised of the existing landbank, new allocations, small sites and a windfall allowance. It is noted that unlike the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012), a percentage of the Coed Darcy development has not been allocated directly towards Port Talbot's housing supply. However, the 322 units from Coed Darcy which were previously allocated towards the Port Talbot Housing Supply have in effect been removed from Port Talbot's housing supply altogether and placed into Neath's housing supply - which partly explains the reduction in the percentage of units provided for within the Port Talbot spatial area when considered against the previous Deposit Plan Proposals Report (October 2012).</p> <p>Whilst support would be given to the removal of an apportionment of the Coed Darcy development from Port Talbot's housing figures, the Deposit LDP has, in effect, not done this, as there has been no resulting increase in other allocations within the Port Talbot area. Accordingly, it is apparent that the Deposit LDP still considers that Coed Darcy will provide for a significant proportion of Port Talbot's housing requirements. This is confirmed within the Population and Housing Topic Paper (August 2013), which states the following:</p> <p><i>"The Strategic Regeneration Areas (SRA) located at Coed Darcy , Neath and Harbourside, Port Talbot will by virtue of their scale and location, particularly in the case of the former, help to meet the future housing needs of the County Borough as a whole. The impact the SRA sites will extend beyond their immediate areas and spatial area boundaries. "</i> (Paragraph 9.5.10)</p> <p>It is considered that this share of the Coed Darcy allocation should not form any part of the Port Talbot housing figures, and that there is the potential that due to this, the Port Talbot Spatial area will be underprovided for in terms of housing provision over the Plan period. In particular, it is considered that it is more likely that Coed Darcy will absorb a proportion of Swansea's housing requirements over the Plan period, due to the close transport links between Swansea and the development site, and the major developments which are likely to come forward to the east of Swansea and close to Fabian Way, which will further shift the focus towards the eastern edge of Swansea. It is therefore considered that Port Talbot will suffer from a shortfall of housing provision over the Plan period.</p> <p>In addition, it should be noted that the LDP, as a whole, overestimates the number of houses that will be provided on Coed Darcy over the Plan period. In particular, over the Plan period (i.e. 2011 - 2026) the Deposit LDP confirms that a total of 2150 dwellings will be brought forward on Coed Darcy - this is considered to be a significant overestimation of the level of development which will take place on the site.</p> <p>It is estimated that Coed Darcy, at its height, will have a build rate of 120 - 150 dwellings (maximum) per year (regardless of the number of house builders). However, it will take 3 / 4 years to reach that level of output. It is likely that there will be very few completions on Coed Darcy in 2013, with completions generally only from 2014 onwards. Therefore, it is likely that there will be only 12 full years of house building over the Plan period (i.e. 2014 - 2026).</p> <p>Accordingly, as a best case scenario, and based on maximum annual build rates (i.e. 150 units per year), Coed Darcy will</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>generate only 1800 dwellings over the Plan period. A more likely scenario, is that the development will generate 120 units per annum, which equates to 1440 dwellings over the Plan period. Accordingly, whilst the allocation of 1828 dwellings for Coed Darcy within Neath may potentially be considered to be appropriate, the allocation of 322 dwellings for Port Talbot is an over-allocation, which in practice, will not be delivered over the Plan period. It should also be noted that the estimation of Coed Darcy providing 1800 dwellings over the Plan period is optimistic in itself, and should therefore be considered as the maximum, rather than a minimum or average supply.</p> <p>This likely lower delivery rate at Coed Darcy is considered to be more a product and result of the site itself - known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. It is expected that house builders will be prepared to run, and will indeed demand, a range and choice of sites throughout the county borough to meet their needs. The Coed Darcy development / site has a unique and particular character and concept that will serve only part of the housing market in the County Borough. Coed Darcy is located on the western extremity of the Plan area and firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment'. This makes a compelling case for the allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on (and indeed exposed to the performance of) one particular scheme, within one particular geographic location.</p> <p>The Coed Darcy element of the Deposit Plan's housing numbers should therefore be reduced in order to accurately reflect the level of development which is likely to come forward over the Plan period. In addition, additional sites should be allocated within the Port Talbot spatial area to ensure that there is no housing shortfall over the Plan period and that Port Talbot's needs are met by its own sites and allocations.</p> <p>Furthermore, it is considered that the balance between brownfield and greenfield allocations within the LDP, and within the Port Talbot Spatial area is too heavily weighted towards brownfield sites. An over reliance on brownfield sites will not offer the greatest choice to residents, as it provides only very limited options for housing development - the range and choice of sites being very similar in location and character.</p> <p>In addition, it is considered that the potential for developer contributions on brownfield sites would be much lower than those likely on greenfield sites, as there is more likelihood on previously developed land for additional development costs, due to site constraints etc. Such a situation results in lower development margins and less opportunity for developer contributions due to scheme viability etc. In this regard, greenfield sites would provide a relatively straight forward form of development, with less unknown costs, and therefore a greater likelihood for developer contributions. It is therefore considered that an increase in greenfield sites within the plan will ensure that the proposed contribution levels are better achieved.</p> <p>Likewise, site constraints on brownfield sites can often lead to delays in developments coming forward, which could have a significant impact on the ability of the Plan to provide and deliver the required housing levels. Greenfield sites however are generally less constrained and can often provide for development earlier in the Plan period. Additional greenfield allocations are therefore required in order to ensure that there is an appropriate balance between brownfield and greenfield and to ensure that the Plan is able to deliver the required housing provision.</p> <p>In this regard, Integrel Geotechnique have undertaken a review (on behalf of the Homes Builders Federation) of the typical abnormal development costs for brownfield sites in South Wales. They estimate that the total cost of remediation / reclamation works and abnormal associated with the redevelopment of brownfield sites for housing would be between circa £175,000 and £325,000 per acre.</p> <p>These additional remediation works therefore represent significant abnormal costs which could impact on the viability and deliverability of brownfield sites, in addition to reducing the ability of sites to provide financial contributions and affordable housing. A reliance of brownfield sites will therefore likely lead to a slower rate of delivery of units - something which has been found within Caerphilly CBC, who are requiring to undertake a review of their brownfield- focussed LDP only 3 years after its adoption (as discussed in further detail above).</p> <p>Greenfield sites, which have less site constraints and therefore less associated abnormal and development costs, therefore provide</p>

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							<p>more straight forward, deliverable and viable development sites. An appropriate balance if greenfield and brownfield sites are required to be provided to ensure that site's do come forward for development across the plan period to provide for assessed housing needs.</p> <p>Proposed Housing Allocations</p> <p>Within Policy H1 Housing Allocations, the Deposit Plan has proposed a number of residential allocations across the plan area which the Council consider are capable of providing the Plan's housing supply.</p> <p>It is considered that a number of the proposed sites are likely undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units within Neath Port Talbot over the plan period.</p> <p>In order to demonstrate this, a comprehensive account and critique of all sites that have been put forward for inclusion within the Deposit LDP and that fall within a core market search area has been undertaken. This core market search area, despite being defined with reference to market 'appeal' still covers a predominant part of the Plan area, and moreover and more importantly, contains the majority of the housing allocations (those falling within the main settlements / core part of the Plan area).</p> <p>These schedules (one relating to the Neath and Pontardawe Housing strategy areas and the other to Port Talbot) have been compiled in order to provide an objective assessment of the deliverability of the housing land supply position put forward by the Deposit Plan.</p> <p>As the schedules outline, there are a number of constraints on a number of the sites proposed for allocation within the Deposit Plan, which reduces the potential of these sites to contribute towards housing provision over the Plan period. Indeed, it is considered that a number of these sites will prove to be undeliverable over the Plan period, leaving the area at risk of being under-provided for in housing needs terms.</p> <p>As can be seen and noted, based on identified site constraints, we have estimated a maximum and minimum site yield for all of the sites. In summary, therefore the review confirms the following:</p> <ul style="list-style-type: none"> • For the Port Talbot Spatial Area, the LDP identifies that the sites will yield a total of 1960 units. • Having regard to relevant site constraints, we estimate that the sites in Port Talbot will yield between a maximum of 1769 units and a minimum of 1395 units. • In the Port Talbot Spatial Area there is therefore considered to be a shortfall of between 191 and 565 units. • For the Neath and Pontardawe Spatial Areas, the LDP identifies that the sites will yield a total of 4149 units. • Having regard to relevant site constraints, we estimate that the sites in Neath and Pontardawe will yield between a maximum of 3586 units and a minimum of 3091 units. • In the Neath and Pontardawe Spatial Area there is therefore considered to be a shortfall of between 563 and 1058 units. • Across the Authority, we therefore estimate that there is a <u>shortfall of between 754 and 1623 units.</u> <p>For clarity, the above is summarised within the table below:</p> <table border="1" data-bbox="1344 1535 2516 1818"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">LDP Site Yield</th> <th colspan="2">Our Estimated Site Yield</th> <th colspan="2">Estimated Shortfall</th> </tr> <tr> <th>Minimum</th> <th>Maximum</th> <th>Minimum</th> <th>Maximum</th> </tr> </thead> <tbody> <tr> <td>Port Talbot Spatial Area</td> <td>1960</td> <td>1395</td> <td>1769</td> <td>191</td> <td>565</td> </tr> <tr> <td>Neath & Pontardawe Spatial Areas</td> <td>4149</td> <td>3091</td> <td>3586</td> <td>563</td> <td>1058</td> </tr> <tr> <td>TOTAL:</td> <td>6109</td> <td>4486</td> <td>5355</td> <td>754</td> <td>1623</td> </tr> </tbody> </table>		LDP Site Yield	Our Estimated Site Yield		Estimated Shortfall		Minimum	Maximum	Minimum	Maximum	Port Talbot Spatial Area	1960	1395	1769	191	565	Neath & Pontardawe Spatial Areas	4149	3091	3586	563	1058	TOTAL:	6109	4486	5355	754	1623
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							<p>The enclosed schedules therefore clearly raise considerable questions over the deliverability of many individual sites, and by association, the cumulative numbers / supply envisaged by the Deposit Plan. Accordingly, it is considered that there is a clear need to allocate additional deliverable sites in order to ensure that the Plan is able to provide the required level of housing provision.</p> <p>It is therefore considered that a wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period.</p> <p>The proposed sites located at Coed Hirwaun are considered to provide for such delivery. The sites represent a suitable, appropriate and deliverable option for development within the Port Talbot spatial area which will ensure that the area is adequately provided for in terms of adequate housing provision over the Plan period. The suitability of the Coed Hirwaun / Margam Village opportunity that is being presented as an Alternative Site is discussed further below.</p>
Dep455	Mr. Derek Walker	Wales Co-operative Centre	786092	Object	Affordable Housing	Policy SP 8	<p>“Welsh Government's Homes for Wales White Paper gives a firm commitment to expanding the role of co-operative housing, by enabling a new housing tenure and creating new co-operative homes. We believe co-operative housing models can offer innovative solutions to help meet the need for good quality, affordable homes.</p> <p>There are many benefits of co-operative housing models. For instance co-operative housing can help increase individual and community empowerment and resilience. Co-operative housing residents are engaged in making decisions about their housing with fellow members helping to build a strong community. In the current climate home ownership is simply not an option for a large number of people and co-operative housing models can play a role in addressing this problem.</p> <p>Whilst recognising that co-operative housing is only likely to be a small part of the picture in the immediate future, we believe it has the potential to play a significant role in the longer term and that co-operative housing should be considered when Neath Port Talbot County Borough Council seek to secure provision of affordable housing on new housing (or mixed use including housing) developments. The exact provision on each site will depend on local evidence of need and financial viability matters.</p> <p>We consider that Co-operative Housing should be actively considered by the Neath Port Talbot County Borough Council LDP in order to support Welsh Government's commitment, and provide sites and resources to meet the challenging short term target and longer term sustainable provision of Co-operative Housing.</p> <p>This will increase the range and choice of New Housing opportunities and Sustainable Communities".</p>
Dep751	Mr Mark Newey	Welsh Government	211935	Object	Affordable Housing	Policy SP 8	<p>The level of affordable need delivered through the plan should be that delivered through the planning system, not other forms of funding such as Social Housing Grant (SHG). It is appropriate to differentiate between the two, adding reference to SHG in the supporting text. This is in line with other adopted LDPs. The number of affordable homes to be delivered in the plan will therefore reduce from 2,507 units to 1,791. This is a shortfall of 1,309 affordable housing units below the identified need of 3,100 affordable homes and could support identifying further housing provision to assist the delivery of affordable housing.</p> <p>A key Government priority is maximising the delivery of affordable housing. Whilst in some cases a local authority may not be able to match the level of need identified, where it is identified as a key issue a local authority should endeavour to do its utmost to achieve this need. All avenues should be explored to maximise the delivery of affordable housing. Additional housing provision in line with the WG 2008 based household projections could enable the authority to better meet the identified need for affordable homes .</p>
Dep621	Mr David Watkins	Natural Resources Wales	786443	Object	Open Space	Policy SP 10	<p>Paragraph 5.1.52 Policy SP 10 Open Space</p> <p>We welcome and support this policy as it provides an opportunity to retain and create areas of green space. However we recommend that the policy is amended by:</p>

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							(i) inserting "as assessed against best available evidence" at the end of Criterion 1; and (ii) Replace Criterion 2 with: "Retain, develop and improve a network of open spaces that addresses any deficiency in provision"
Dep628	Mr David Watkins	Natural Resources Wales	786443	Object	Employment Growth	Policy SP 11	Paragraph 5.2.1 Policy SP11 Employment Growth This element of Plan does not fall within our remit but we do have one general observation. We note the aspirations of the Authority and the anticipated increase of jobs within the authority area. However, the proposed level of employment land provision (96ha) remains significantly higher than take-up rates for the county for the period 2001 - 2010 (56.12ha) as set out in Table 7.2 of the Economy and Employment Topic Paper (September 2011). We welcome and note the Topic Papers prepared in support of this Deposit Plan. However, we remain unclear on the evidence to demonstrate the realistic delivery of this level of growth within the Plan period.
Dep920	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Employment Growth	Policy SP 11	Policy SP11 is a topic-based policy, concerning employment growth. The supporting text confirms that existing employment uses will be supported and safeguarded and new and expanding employment developments will be encouraged through the allocation of land in the Coastal Corridor Strategy Area and the safeguarding of existing employment areas. It is clear that the Council supports the full range of economic activity at Baglan Bay and not just (or only) B class uses. Paragraph 5.2.3 of the DLDP correctly acknowledges that the site cannot and should not be subdivided and that an allocation for specific uses or amounts of development will undermine its true potential.
Dep634	Mr David Watkins	Natural Resources Wales	786443	Support	Tourism	Policy SP 13	Paragraph 5.2.51 Policy SP 13 Tourism We support this policy.
Dep915	Miss Bethan Jenkins AM		473974	Object	Tourism	Policy SP 13	In terms of promoting Equestrian Tourism in accordance with current strategies focusing on four main geographic locations - Margam Park; Afan Forest Park; Pontardawe; and the Vale of Neath - I have a constituent who has expressed her concerns that it is extremely dangerous to have 60mph speed limits on country lanes where horses are kept - is there going to be a proposal to reduce the speed limit on country lanes to facilitate safe equestrian use as part of the future planning of the LDP?
Dep641	Mr David Watkins	Natural Resources Wales	786443	Object	The Countryside and the Undeveloped Coast	Policy SP 14	Paragraph 5.3.1 Policy SP14 The Countryside and the Undeveloped Coast We support this policy but question the integrity and practicality of advocating the protection of seascapes within its content as they fall outside the control of the local planning authority. Additionally the phrase "where feasible" should be omitted as it devalues the integrity of the policy.
Dep225	Mr Paul Bulmer		345444	Object	Biodiversity and Geodiversity	Policy SP 15	I can see that Nature Reserves are marked on the map but the Bryn Nature Reserve is not shown. This looks like an omission possibly since the Bryn Reserve was only recently approved.
Dep652	Mr David Watkins	Natural Resources Wales	786443	Object	Biodiversity and Geodiversity	Policy SP 15	Paragraph 5.3.26 Policy SP 15 Biodiversity and Geodiversity We welcome and support the inclusion of this strategic policy for the protection, enhancement and management of biodiversity and geodiversity. However, the criteria only refer to the identification or protection of natural heritage interests. To ensure consistency, we recommend that criteria 1 to and 3 of the policy should also refer to the enhancement of identified natural heritage interests.
Dep312	Mrs Elaine Jones		784164	Object	Environmental Protection	Policy SP 16	Brownfield sites should rightly be chosen over greenfield but with awareness that brownfield sites may also be of environmental / biodiversity value.
Dep665	Mr David Watkins	Natural Resources Wales	786443	Object	Environmental Protection	Policy SP 16	Paragraph 5.3.38 Policy SP 16 Environmental Protection We welcome the sentiments of this policy but question the use of the words "significantly and significant" in the criteria 1 & 2. Surely there should be no increase in pollution levels and we question the soundness of this policy.

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Dep800	Ms Jean White		336225	Object	Minerals	Policy SP 17	A second area of concern is that relating to the development of mineral resources. There is now far more information about the risks associated with the exploration and exploitation of unconventional gas, particularly shale gas through fracking. These risks are environmental and also potentially social (e.g. the depreciation of housing prices in affected areas). A recent EU vote agreed that a full environmental impact should be routinely carried out for each development which I understand will be the responsibility of Natural Resources Wales. This will incur financial costs and I wonder if Natural Resources Wales has the resources to undertake this. I believe that the LDP needs to be amended to reflect increased awareness of the costs and risks and uncertainty about regulation so that unregulated development cannot go ahead until these important all-Wales issues have been resolved.
Dep673	Mr David Watkins	Natural Resources Wales	786443	Object	Minerals	Policy SP 17	Paragraph 5.3.58 Policy SP 17 Minerals We are surprised that there is no reference to underground gasification and coal bed methane exploration within the Plan. This is an important element of the energy programme and must be identified within the Plan and incorporated within the minerals policy or elsewhere in the Plan. Your Authority has approved several exploratory drill sites and this element of energy provision needs consideration within the Plan.
Dep744	Mr Graeme King		787594	Object	Minerals	Policy SP 17	I have reviewed the Consultation document and in particular Section 5 The Topic Based Policies and would like to offer the following comments which apply to Policy SP17 Minerals and Policy M1 Development in Mineral Safeguarding Areas . The Plan recognises the requirement to supply crushed rock throughout the Plan period from the two existing quarries within the Authority's boundaries, including Cwm Nant Lleici Quarry near Pontardawe. Policy SP17 Minerals reiterates the fact that a balanced approach needs to be taken for the Authority to continue to make its contribution in meeting national, regional and local materials demands through balancing the impact which a development might have on the environment and community within which it is located. The existing extraction and processing area at Cwm Nant Lleici Quarry is shown verged blue on the attached plans. In 2008 planning to work mineral lying to the south in the area outlined in green was granted permission although to date this area remains unworked. Aggregate Industries is reviewing the longer term reserve and investment position required to secure quarrying throughout the Plan period and beyond at Cwm Nant Lleici. In this regard Aggregate Industries has identified an area contiguous to and west of its present operation at Cwm Nant Lleici which has been proven through drilling to be underlain by material of similar quality to that being worked. The area is estimated to contain of the order of 3 million tonnes of high quality grit stone and I have marked the area in red on the attached drawings. The location abutting the western boundary of the existing quarry will allow any material extracted to be transported back to the current processing plant and associated infrastructure. The area proposed would allow the continued backfilling of unsold material within the quarry (up to 40% of the total extracted material) without encroaching upon that part of the quarry through which free access will be required to develop the existing permitted reserves. Perhaps most importantly the area proposed would secure the existing level of permitted reserve at the quarry whilst remaining outside the 200 metre buffer zone (from Pant Gwyn Farmhouse) that currently constrains the existing permitted area. This is important for continued investment and security of quarrying throughout the Plan period. Any application to work this mineral would first be subject to a scoping opinion request to identify all matters that would need to be addressed. Amongst these topics would be hydrology, ecology (especially upon the existing SSSIs), land quality and landscape impact. At this stage it is considered that any proposal could meet policy requirements for these topics. The Company therefore believes that the red area identified on the attached plans should be included in the emerging Local Development Plan as a mineral block of strategic importance as well as being safeguarded from any alternative forms of development which could prejudice the ability for extraction to occur in the future.
Dep797	Mr Mark	Welsh Government	211935	Object	Renewable and Low Carbon Energy	Policy SP 18	Renewable and low carbon energy

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	Newey						NPT have undertaken a Renewable Energy Assessment, however the findings of the study are not accounted for in policies to guide appropriate development.
Dep799	Mr Mark Newey	Welsh Government	211935	Object	Renewable and Low Carbon Energy	Policy SP 18	Policy SP18 should not refer to 'a "proportionate" contribution to meeting renewable energy targets.
Dep812	Mr Richard Buckland	Infinis	786727	Support	Renewable and Low Carbon Energy	Policy SP 18	The following policy is supported as being consistent with and reflective of national planning guidance. The policy wording is welcomed as forming a logical flow from the overarching objective. Policy SP18 - Renewable and Low Carbon Energy
Dep681	Mr David Watkins	Natural Resources Wales	786443	Object	Waste Management	Policy SP 19	Paragraph 5.3.106 Policy SP 19 Waste Management We find this element of the Plan needs a more robust approach and Policy amendments. The use of the term 'waste hierarchy' is not used anywhere in this Policy /Objectives. No reference made to prevention, re-use, recycling before consideration of other recovery or disposal options.
Dep277	Mr Lennard Powell		335574	Object	Transport Network	Policy SP 20	The site (H1/12) is approximately 160Metres above sea level at the top of a steep incline. Existing households in the immediate area predominantly use the motor car as their preferred mode of transport for both travel to work and social events, as the location of the site makes cycling and walking prohibitive. The timing of the public transport service is currently unsuitable for travel to work and social purposes, and has not improved in the past 23 years. Recent housing developments in the immediate area have increased car usage and the current average car ownership in the immediate area is of the order of 2 cars per household. The proposed housing development (141 houses) would result in an increase of 282 motor cars in the area. The carbon footprint of 282 motor vehicles (manufacture, running and replacement) is unsustainable. I contend that this renders your Policy SP20 5.4.1 statement 7 and SP20 paragraph 5.4.4 contradictory to the proposed development of the site, and renders the Plan unsound.
Dep231	Mr Paul Bulmer		345444	Object	Transport Network	Policy SP 20	There is mention of improving public transport along Primary and Core network links but Bryn is not on either of these.
Dep686	Mr David Watkins	Natural Resources Wales	786443	Support	Transport Network	Policy SP 20	Paragraph 5.4.1 Policy SP 20 Transport Network In part (3) of this policy there is reference to enhancing walking and cycling network. This is echoed in paragraph 5.4.4. and we support this action. In part (9) the Plan advocates the facilitating movement of freight by rail rather than road which is in accord with current Welsh Government guidance on climate change.
Dep228	Mr Paul Bulmer		345444	Object	Built Environment and Historic Heritage	Policy SP 21	Margam is marked up on the map for its scenic and historic significance. This boundary includes parts of Bryn. The importance of Bryn as a gateway into this area should be mentioned the same as villages in the valley areas.
Dep693	Mr David Watkins	Natural Resources Wales	786443	Object	Built Environment and Historic Heritage	Policy SP 21	Paragraph 5.5.1 Policy SP21 Built Environment & Historic Heritage For improved clarity, we recommend that criterion 4 is amended by inserting "in accordance with national planning policy" after "to enable their protection".
Dep593	Mr David Watkins	Natural Resources Wales	786443	Support	Coed Darcy Strategic Regeneration Area	Policy SRA 1	Paragraph 4.0.6 Policy SRA1 We support the regeneration of brownfield sites and Coed Darcy is an excellent example of this philosophy. We would be grateful for consultation upon the proposed SPG.
Dep1089	Mr Ben	St. Modwen Developments Ltd	787655	Object	Coed Darcy Strategic Regeneration Area	Policy SRA 1	The enclosed report, 'Neath Port Talbot Local Development Plan, Representations: Coed Darcy, October 2013) provides detailed comments on Policy SRA 1 (see sections 3 and 6). In summary, Policy SRA 1 and its supporting text, clearly recognise the

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	Cook						<p>contribution Coed Darcy will make to the strategy of Neath and this support is a key thread in the plan's early strategic sections. Policy SRA 1 refers to the planning permission for the new urban village, and how the development concept aims to deliver a sustainable community whereby residents can closely access facilities, services and employment opportunities.</p> <p>However, the plan should increase the amount of development that will be delivered at Coed Darcy over the plan period. The project is a major regeneration initiative and a start on development has been made in the most challenging economic conditions. Supporting and accelerating the continued progress of Coed Darcy is a key regional and local objective and the Plan can play a key role in this respect. Therefore, Policy SRA 1 should be changed to increase the number of units to be delivered at Coed Darcy during the plan period.</p> <p>The Importance and Credentials of Coed Darcy</p> <p>As stated above, the priority given to Coed Darcy in the plan, as an anchor for the strategy for Neath and for a large part of the County Borough, is fully supported.</p> <p>Coed Darcy is, however, a project of regional potential and national profile that will stimulate significant activity and jobs in its preparation, delivery and operation. SMDL has made a major long term commitment in challenging conditions and the substantial progress that has already been made on the site is a clear signal that comprehensive regeneration will continue across the whole of the plan period.</p> <p>In this way and as stated already - Coed Darcy is more than a source of new housing - it is important as a strategic initiative that should be given primary importance (and protection) through the plan's proposals, phasing and delivery. The plan makes important references to Coed Darcy and these are appreciated. However, its provisions for the site need to match SMDL's commitment and most significantly they need to reflect the project's total potential and priority which goes well beyond (just) the provision of new homes. This concern is expanded upon in section 6 of this report.</p> <p>The Plan's statement that Coed Darcy will meet the majority of the Neath spatial area's housing needs and has the potential to provide an increased number of houses is also correct. This approach recognises the substantial progress made with the site already, and makes provision for different economic circumstances which will drive an increase in the number of houses that can be delivered there.</p> <p>For all these reasons, we support the priority that Coed Darcy is given in the DLDP. It recognises the project's strategic importance and the progress on the site to date. Whilst this progress has been substantial, and further development is in the pipeline, the project needs the LDP's complete assistance throughout the plan period. On the face of it, the plan does this - and as this section makes clear, there is much to support in terms of the plans overall aims, objections and priorities. Our concern with the DLDP is that this is then threatened by its development strategy which promotes a level of growth which is both unrealistic and (unintentionally) very harmful. This is discussed in the next section of this report.</p> <p>Policy SRA 1 of the DLDP designates Coed Darcy as a Strategic Regeneration Area (SRA) and allocates land at Coed Darcy for the development of an urban village comprising 4,000 units (2,150 within the Plan period) and 41,200 sq m of employment land (B1 business use). As we have said before the Coed Darcy project is a lot more than a way of meeting housing requirements. It's recent history and the dividends generated by the complete transformation of the former refinery it sit on have been well communicated and will be well known to the Council.</p> <p>In this context, the LDP's allocation is supported (and this reflects the strategic significance that earlier parts of the plan give to Coed Darcy). However, a refinement to the amount of housing which can be delivered at the site should be made - and this is described and explained below.</p> <p>Delivery of Housing at Coed Darcy</p> <p>The LDP expects 2,150 new housing units to be delivered at Coed Darcy up to the year 2026. A further 1,850 units are expected</p>

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							<p>to be delivered beyond the life of the LDP from 2026 onwards. We see Coed Darcy as capable of higher amounts of development than the plan currently proposes.</p> <p>The reasons for this have been provided previously - Coed Darcy has made a lot of progress in the last two to three years, which most commentators recognise to be the most challenging in recent memory. This makes the position reached all more the remarkable, especially as it has been achieved when few other sites - including greenfield opportunities around it - have achieved anything. The first developer on the site has however given the Council ultra cautious delivery rates (which, amongst other things reflect its general view on the state and capacity of the market and its own promotion of a greenfield site elsewhere in the Borough). These rates appear to have resulted in a relatively low expectation of the number of homes that Coed Darcy will deliver.</p> <p>In this way Coed Darcy has been penalised in the plan because of the position it has reached. This logic suggests that, despite the start sending a clear signal that the Coed Darcy is attractive, it would have been better to leave it alone - like all the other sites that have stalled (which include a lot of the small greenfield sites in the surrounding area).</p> <p>We prefer a more positive diagnosis that reflects the significance of the progress that has been made. This sees slightly higher rates of development as economic conditions improve and more of the site is opened up. As a result we expect that Coed Darcy will deliver more but recognise that this is less than we first expected. This is not because of the site's potential which has been clearly established by the start (on market housing) that has been secured - but because of the state and capacity of the market place.</p> <p>Our assessment proposes the completion of about 2500 dwellings over the plan period. This is a little lower than we figure we included in our pre-deposit representations, and a little higher than the 2,150 that features in the DLDP. We consider that it is reasonable to support higher figures later in the plan period (say from 2017 or 2018 onwards) and it may be that a higher figure is proposed for 2020 - 2026 on the basis that if it is not met then the plan can be reviewed (and a review is likely to be underway in any event by that time).</p> <p>However, the difference over the plan period totals 350 and this needs to be reduced or removed. We are confident that the rates we propose can be achieved and - given the progress that we have made in the worst economic conditions - if we cannot do this it will be because the capacity of the development industry and the market is clearly very low and cannot support the rates of growth the plan proposes. The figures we propose, and their inherent flexibility, will also provide the authority with a 'safety valve' for housing delivery which will respond to commercial and market demand, should this increase more rapidly or more significantly during the plan period.</p> <p>In either scenario the plan will direct growth to right place if it prioritises Coed Darcy and relies on ambitious but realistic rates there. On the other hand the risks of not adjusting the plan - in terms of its overall rates and allocations or the assumptions it makes about delivery at Coed Darcy are very significant.</p> <p>Conclusion</p> <p>Whilst the overall, strategic importance of Coed Darcy is recognised in the plan, it can still do more to help the project achieve its full potential. Most significantly it can and should increase the amount of development that will be delivered at Coed Darcy over the plan period. The project is a major regeneration initiative and a start on development has been made in the most challenging economic conditions. Supporting and accelerating the continued progress of Coed Darcy is a key regional and local objective and the plan can play a key role in this respect.</p>
Dep594	Mr David Watkins	Natural Resources Wales	786443	Object	Harbourside Strategic Regeneration Area	Policy SRA 2	<p>Paragraph 4.0.11 Policy SR2 Harbourside Strategic Regeneration Area</p> <p>It is possible that parts of this regeneration proposal may not be feasible due to concerns regarding flood risk and air quality. These concerns have been raised previously and prior to the submission of the Plan. Please refer to previous comments in Paragraph 3.0.2.</p>

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							<p>There seems to be a contradiction in relation to this Policy and the proposals to regenerate the Harbourside area, Port Talbot. Your Strategic Flood Consequence Assessment indicates that this scheme will have detriment upon 3rd parties in terms of flood risk. This is not in accordance with both National Planning Policy and your Policy SP1. Additionally there is a conflict between your Policy SP1 Climate Change and Policy SR2 Harbourside Strategic Regeneration area - this must be addressed.</p> <p>It would be premature to develop a Policy for this area until it can be determined that the development proposal will be acceptable and meet the requirements of Welsh Government guidance TAN15 (July 2004) and the potential implication for air quality within the local area, particularly the Port Talbot Air Quality Management area.</p>
Dep646	Mr V Price		196316	Object	Tourism Development in the Countryside	Policy TO 1	<p>We welcome and support this policy.</p> <p>However there may be disputes between the council and applicants over criteria 2 and we would therefore encourage explanation of what information would be needed for the council to be satisfied that the proposal requires a countryside location.</p> <p>For example, some hotels are designed to serve countryside pursuits and activities and benefit from a rural/semi-rural location, whilst other kinds of hotel are aimed at urban areas. In other words, not all hotels (or other kinds of tourism development) can be judged by the same factors. It would be wrong for an applicant's proposal for a country-style development (e.g. aimed at weddings or events or for guests to access the countryside) to be rejected because there are sites available within the urban area.</p>
Dep635	Mr David Watkins	Natural Resources Wales	786443	Support	Tourism Development in the Countryside	Policy TO 1	<p>Paragraph 5.2.54 Policy TO 1 Tourism Development in the Countryside</p> <p>We support the Policy and note part 3 of the criteria-which advocates the protection of <i>"the landscape, ecology...environmental or residential amenity of the area"</i>.</p>
Dep636	Mr David Watkins	Natural Resources Wales	786443	Object	Tourism Led Regeneration	Policy TO 3	<p>Paragraph 5.2.62 Policy TO3 Tourism Led Regeneration</p> <p>The allocated site at Rheola still needs to be adequately addressed in terms of flood risk. This risk has not yet been fully quantified and we are therefore unable to support this policy at this time.</p> <p>Additionally any development at this site should make provision for the protection of the ancient and semi natural woodland, wet woodland (BAP habitat), lakes and ponds (BAP habitat) within the site. We are also aware that there are records of otters and bats on the site, both of which are European Protected species. Any development at this site will be required to comply with the requirements of the Conservation of Habitats and Species Regulations 2010.</p> <p>In our comments to 'Policy H1: Housing Sites', we recommend that an Annex should be attached to the LDP that includes the environmental considerations which will need to be taken into account at the planning application stage. Should it be decided to attach such an Annex to the LDP, we recommend that the natural heritage considerations we have identified above in relation to the Rheola site should be detailed in the Annex.</p>
Dep22	MS Penny Robinson		778955	Object	Walking and Cycling Routes	Policy TO 4	<p>Most of this is complete, This is Plan for up to 2026. What is the future plans - if any ?</p>
Dep226	Mr Paul Bulmer		345444	Object	Walking and Cycling Routes	Policy TO 4	<p>It was good to see that the Great Dragon Ride route is shown on the map but the fact that this passes right through Bryn and links the Afan valley to Margam is completely ignored whereas the importance of other paths in linking the identified tourist spots is repeatedly stressed. The old railway line from Goytre to Bryn is also regularly used by cyclists and horses and this line crosses the Great Dragon Ride at Bryn. This track also provides off road access direct from Port Talbot.</p>
Dep637	Mr David Watkins	Natural Resources Wales	786443	Support	Walking and Cycling Routes	Policy TO 4	<p>Paragraph 5.2.65 Policy TO 4 Walking and Cycling Routes</p> <p>We support this policy.</p>
Dep224	Mr		345444	Support	Transport Proposals	Policy	<p>The proposals for Park and Share near to the M4 is something I have always wondered why these have not been done before. I</p>

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	Paul Bulmer					TR 1	am sure far more people would share part of their daily commute if such facilities were made widely available.
Dep803		Associated British Ports	587221	Object	Transport Proposals	Policy TR 1	Policy TR1/5 - Harbour Way (PDR) - Whilst the principle of the proposed road link is supported the Proposals Map indicates that some of the land allocated for the road is within the ownership of ABP or immediately adjacent to such land. ABP would wish to ensure that implementation of the proposal will not adversely impact upon its existing and well-established operations at Port Talbot Docks.
Dep689	Mr David Watkins	Natural Resources Wales	786443	Support	Transport Proposals	Policy TR 1	<p>Paragraph 5.4.10 Policy TR1 Transport Proposals</p> <p>TR1/1 Baglan Energy Park Link Road :We welcome the sustainable transport objective of creating a Port Talbot to Swansea Bus Corridor using the link road.</p> <p>TR1/7 Amman Valley Cycle Way : We support the proposed improvements to the Amman Valley Cycle Way.</p> <p>TR1/8 Afan Valley Trail : We support the proposed improvements to the Afan Valley Trail.</p>
Dep921	Mr Ben Cook	St. Modwen Developments Ltd	787655	Support	Transport Proposals	Policy TR 1	<p>The DLDP also identifies the Baglan Energy Park Link Road as a new transport scheme under Policy TR1/1. The proposed link road will create a through road to connect the two phases of Baglan Energy Park. This could have a number of benefits to the performance and potential of the area (and will also help to connect existing development more effectively to the strategic transport network).</p> <p>The allocation of the Baglan Energy Park link road under Policy TR1/1 is therefore supported.</p>
Dep691	Mr David Watkins	Natural Resources Wales	786443	Support	Design and Access of New Development	Policy TR 2	<p>Paragraph 5.4.22 Policy TR2 Design and Access of New Development</p> <p>We support the inclusion of this policy.</p>
Dep692	Mr David Watkins	Natural Resources Wales	786443	Support	Safeguarding of Disused Railway Infrastructure	Policy TR 3	<p>Paragraph 5.4.27 Policy TR3 Safeguarding of Disused Railway Infrastructure</p> <p>We support the inclusion of this policy.</p>
Dep807		Associated British Ports	587221	Object	Safeguarding Freight Facilities	Policy TR 4	<p>In general support is given to Policy TR4. However, in view of the amount and variety of land allocated under this policy (including that at the Docks, the harbour, at existing and potential wharves and at rail connections and sidings) ABP feel that further consideration should be given to the potential of some of its landholding to come forward for alternative forms of development in the future. ABP's comments in relation to the LDP Strategy should be considered in this respect and Policy TR4 should not only recognise the economic importance of the existing and long established port operations at Port Talbot Docks but also allow the flexibility to continually improve those facilities and operations and their input into the local economy including by encouraging development of energy and infrastructure projects that are compatible with dock operations, the attraction of inward investment for manufacturing and other industries and even recognising their potential for accommodating future mixed use regeneration schemes that could compliment the Harbourside proposals.</p> <p>As such it is suggested that the following wording should be added to the end of Policy TR4:</p> <p><i>"...or that alternative or complimentary uses proposed could themselves contribute to the local economy and/or its regeneration"</i></p>
Dep753	Mr Malcolm Lawer	Lafarge Tarmac	767883	Object	Safeguarding Freight Facilities	Policy TR 4	<p>Policy TR4, if applied in an inflexible way, could inhibit developments at wharves. The objective to safeguard wharves for the movement of freight is accepted, but this should not preclude development at wharves where the development would not inhibit or prejudice the potential for use of the wharf. Developments at wharfs should not be constrained to using the wharf for inward and / or outgoing transportation of freight.</p> <p>The second sentence of Policy TR4 should be expanded to read.....is not realistic or necessary "or would not inhibit the potential for the movement of freight via the wharf".</p>

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Dep599	Mr David Watkins	Natural Resources Wales	786443	Object	Valleys Regeneration Scheme	Policy VRS 1	Paragraph 4.0.33 Policy VRS 1 Valleys Regeneration Scheme Site at Park Avenue, Glynneath. We remind you that this site is potentially liable to flood risk and any development proposal will have to be supported by a detailed Flood Consequence Assessment (FCA) to assess the risk.
Dep786	Mr Mark Newey	Welsh Government	211935	Object	In-Building Waste Treatment Facilities	Policy W 1	The draft TAN 21 Waste (paragraph 2.8) states a move away from the use of the Best Practicable Environmental Option (BPEO) test to assess the appropriateness of potential developments. Policy W1 should delete reference to BPEO. The authority's specific requirements in terms of size, type of facility and location for the three sites considered suitable in principle for new waste facilities identified in Policy W1 are unclear. It is difficult to assess whether the sites identified will adequately meet the need.
Dep683	Mr David Watkins	Natural Resources Wales	786443	Object	In-Building Waste Treatment Facilities	Policy W 1	Paragraph 5.3.113 Policy W1 In-Building Waste Treatment Facilities We note that throughout the Plan an emphasis is placed on the provision of " <i>in-building</i> " waste management facilities at 3 specific locations within the Plan area. They are: <ul style="list-style-type: none">• Baglan Bay;• Junction 38 (M4) Margam;• Kenfig Industrial Estate, Port Talbot. The Policy to site waste management facilities and installations inside buildings helps the operator to better control environmental risks, especially those risks relating to amenity, and we support the use of Part 2 of this Policy which indicates 5 (a-e) criteria which have to be met before any permission is granted. In paragraph 5.3.115 there is a definition of what "in-building facilities" specifically means within the context of this Policy and we remind your Authority that these potential activities may require an environmental permit from us. In paragraph 5.3.117 there is specific reference to the possible implications of this Policy upon the Crymlyn Bog Special Area of Conservation (SAC) and Kenfig SAC and the requirement for a Habitats Regulation Appraisal to be undertaken at a project level. We welcome this statement as protection of these areas is identified in your Policy SP15.
Dep684	Mr David Watkins	Natural Resources Wales	786443	Object	Disposal of Inert Waste on Agricultural Land	Policy W 2	Paragraph 5.3.124 Policy W2-Disposal of Inert Waste on Agricultural Land This Policy as drafted is not acceptable and conflicts with existing waste management legislation and terminology. We acknowledge your interest in ensuring inert waste is used in a sustainable fashion but the policy does need revision. The Policy utilises incorrect terminology and should be rewritten by deleting the term " <i>Disposal</i> " from the text and which should be replaced by " <i>The deposit of...</i> " terminology. Deposits of inert waste on agricultural land may be authorised by registering the appropriate exemption or under a <i>Deposit for Recovery</i> environmental permit or <i>Mobile Plant</i> environmental permit. Policy W2 also states " <i>Proposals for the deposition of inert waste on agricultural land will only be permitted where all of the following criteria, where relevant, are satisfied:</i> <i>1. It can be demonstrated that there are no practicable re-use or recycling opportunities for such material.</i> " Overall Policies W1 & W2 require revision to reflect a robust approach and we offer our assistance in any redrafting.
Dep685	Mr David Watkins	Natural Resources Wales	786443	Support	Waste Management in New Development	Policy W 3	Paragraph 5.3.128 Policy W3 Waste Management in New Development There is reference in this policy to the provision of a Site Waste Management plans by the developers for certain developments. We support this action and are happy to offer any assistance to your Authority on generic advice in relation to its possible content and requirements.

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Dep23	MS Penny Robinson		778955	Object	Development in Language Sensitive Areas	Policy WL 1	Pontardawe and Surround = Language sensitive area but nearly 400 new homes ? Not a compatible requirement - this will never cater for promoting protecting or enhancing the welsh language Even if Pontardawe could entice 50% of population to be new residents (rather than just existing residents in more homes) that would be on average 500 new residence who are unlikely to be welsh speakers. and reduce the number of local welsh speakers even further....
Dep788	Mr Mark Newey	Welsh Government	211935	Object	Development in Language Sensitive Areas	Policy WL 1	<p>Policy WL1 requires certain development proposals to be accompanied by a Language Action Plan. This is not consistent with national policy and should be amended. National Planning Policy states that the Welsh language should be considered when formulating the plan. It is appropriate for the authority to identify appropriate mitigation measures in its plan and Supplementary Planning Guidance (SPG) on the Welsh language (see TAN 20 sections 3.8 and 4.3) following rewording the current policy accordingly.</p> <p>The Welsh Language Board (paragraph 5.5.28) was dissolved in March 2012. The majority of the WLBs functions have now transferred to the Welsh Language Commissioner's office.</p>
Dep820	Mr Mark Newey	Welsh Government	211935	Object	Development in Language Sensitive Areas	Policy WL 1	Policy WL1 'Development in Language Sensitive Areas' refer to spatial areas which should be shown on the proposals map.
Dep1245	Mr P Lloyd-Jones	Cwmlllynfell Community Council	196349	Object	Settlement Hierarchy for Neath Port Talbot	Table 3.1	<p>The fact that that the plan has classified the Penrhiwfawr Ward of the Community as a 'Dormitory Settlement' is potentially damaging to the area and is in direct contravention to the vision and many of the strategies outlined in the plan. The condemnation that is made in the plan that settlements such as Rhiwfawr provide minimal or no services and facilities is a reflection of the County Borough Council's lack of empathy with such areas rather than an accurate assessment of such communities. In fact the County Borough Council's own actions such as the closure of Rhiwfawr School against the wishes of local residents is testament to its condemnation and a major contributory factor to any degeneration that has occurred. The statement that such locations are considered 'unsustainable' and providing no development potential shows a lack of affinity with such areas and is contrary to the vision defined in the plan.</p> <p>The fact that Rhiwfawr is declared to be a "Dormitory Settlement" does not show a commitment to support and revitalise the area. It is also inaccurate as Rhiwfawr has three of the four facilities which define " Small Local Centres " in the Settlement Review/Urban Capacity Study, namely a community hall, church (chapel) and park/public open space. Until Rhiwfawr School was closed it had all four of the examples given in the study for small local centres. It is obvious that the definition of "Dormitory Settlement" is incorrect and therefore Policy SC1 is defective.</p>
Dep1343	Mr and Mrs Richard and Mari Jones		785448	Object	Settlement Hierarchy for Neath Port Talbot	Table 3.1	<p>We think that the LDP is misguided and should be changed for a number of reasons.</p> <p>Firstly, as residents of Penyrhiw for over 30 years and in the case of Mari Jones (co-signatory to this objection) who was born in the village, and apart from four years living in the Swansea Valley, has lived in Penyrhiw for over 50 years. We object strongly to the fact that Rhiwfawr has been classed as 'Dormitory Settlement' (Table 3.1) within the LDP.</p> <p>If you are not aware, Rhiwfawr is a Welsh speaking village which had until recently a welsh medium primary school.</p> <p>It would appear from reading the LDP Deposit Plan that NPTCBC is deliberately causing the death of the community of Rhiwfawr by neglect.</p> <p>The Plan appears to contain a number of contradictions, in particular under Environment Strategy for Wales 2006 where it states 'by 2006 we want to see a distinctive Welsh environment thriving and contributing to the economy and social well being and health of all people in Wales'.</p> <p>Additionally the LDP talks about the Western Valleys Strategy and the Re invigorating of the Valleys, including the preserving of the spoken Welsh language, yet as stated the LDP seems to contradict these strategies by classing Rhiwfawr as a 'Dormitory Settlement' (3.0.9).</p> <p>It appears that NPTC are watching what is happening in relation to the decline of community and are not intervening as they</p>

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							<p>should as mentioned in the 'Western Valleys Strategy and the Re Invigorating of the valleys'.</p> <p>Having read the letter of responses from the Department of Education and Skills WAG dated 14/7/3011 addressed to Mr Karl Napieralla Director of Education NPTCBC in relation to the Councils proposal to close Rhiwfawr School. It is notes that at paragraph 14 and 29 of the letter, that the costs of maintaining the school was a major significance, and at paragraph 27 it was pointed out that the alternative school YGGD Cwmllynfell was in relatively close proximity to Rhiwfawr. This would appear to be another contradiction in the Re Invigoration of the Valleys.</p> <p>It is our opinion that Rhiwfawr is not a 'Dormitory Settlement' and is a community that thrives from its location in that it is in close proximity to both Cwmllynfell and Cwmtwrch. Additionally within 2 miles there are three large superstores namely Asda in Ystalyfera and Tesco and Co-op in Glanrhyd. There are also a number of restaurants within 2 miles of Rhiwfawr.</p> <p>In addition to the above, residents within Cwmllynfell and Rhiwfawr have access to facilities in neighbouring authorities namely Powys Leisure Centre in Ystradgynlais all within minutes from our homes. There are also theatres and Cinemas in Ystradgynlais and Upper Brynamman, again a mater of minutes.</p> <p>A lot of these facilities are closer to the residents of Rhiwfawr and Cwmllynfell than some of the villages in the Neath and Port Talbot areas.</p> <p>We propose that paragraph 5.1.8 be amended to include Rhiwfawr and not to class it as a 'Dormitory Settlement'.</p>
Dep391	Mr H G Rees		785388	Object	Upper Neath Valley Strategic Growth Area Allocations	Table 4.2	<p>Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p> <p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes.</p> <p>Table 4.2 should be amended to include an allocation for Rheola.</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p> <p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play</p>

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							<p>in the regeneration of the Upper Neath Valley and beyond.</p> <p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p> <p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the whole site.</p> <p>Comment</p> <p>It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan - having said which these comments use Rheola as an example that may not be repeated elsewhere.</p> <p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the</p>

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							<p>introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in the Western Valleys Strategy initiate recognised this and it is argued that OB6 should make explicit reference to Rheola.</p> <p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to ‘drag’ economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion</p> <p>Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.</p>
Dep609	Mr David Watkins	Natural Resources Wales	786443	Object	Total Housing Requirement	Table 5.1	<p>Paragraph 5.1.3 Table 5.1 Total Housing Requirement</p> <p>This element of Plan does not fall within our remit but we do have one general observation. The table indicates that up to 115 empty properties would be brought back to beneficial use through the Empty Homes Initiative over the Plan period of 15 years. This averages about 8 per year. This figure appears to be low and could not money allocated for new build affordable homes be better and more efficiently spent on converting/upgrading existing housing stock. This would utilise and effectively recycle existing vacant housing stock and there maybe benefits financially in such an exercise to developer and local authority.</p>
Dep471	Mrs Elizabeth Thompson		587642	Object	Distribution of Overall Housing Provision	Table 5.3	<p>Infrastructure (Fails P2 CE1)</p> <p>NPT have drastically increased the housing projection required by the LDP over the last couple of months. Originally only three quarters of the houses were proposed during their public exhibitions(2009). This suggested that Pontardawe would only need 50</p>

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							houses. Now the village of Alltwen is going to get 50 houses on its southern side(Ynysymond) and 50-100 houses on its northern side(Brynmorgrug). The only school within walking distance of these proposed developments is Alltwen Primary. This school is oversubscribed with no plans for expansion due to financial cutbacks. Encouraging more pupils into this school without concrete plans and finances in place illustrates the complete lack of co-ordinated strategy by local government. In my opinion it has resulted in a panic reaction from NPT which could have serious long term implications on the community of Alltwen.
Dep731	Mr T. Williams		787380	Object	Distribution of Overall Housing Provision	Table 5.3	<p>Only require a mere extension to settlement limit, enough for one dwelling on boundary of settlement, adjacent to existing land where planning permission granted.</p> <p>I believe that the LDP is unsound. Having read the LDP, Candidate Site Assessment Report, Population and Housing Topic Paper, Settlement Topic paper, Economy and Employment Topic Paper there is not enough land in the Valleys.</p> <ul style="list-style-type: none"> • 65 units in Table 5.3 over 15 years is not reinvigoration as it says in the "vision." • 60 windfall sites are no guarantee of any being developed yet I wish to build. • My site is a gateway to the village and as such will be a high quality, well maintained statement property to reflect a new era of reinvigoration • Too many plots are available for large developers and therefore the plan is not flexible. • The Peoples Places Futures, Vibrant Economy, Economic Renewal: A New Direction, Vibrant and Viable Places, Swansea Bay City Region, Economic Growth Strategy, SIP Outcome 3, Western Valleys Strategy, Local Housing Strategy and the Vision all directly state "Valley communities will be supported and revitalised through encouragement of new and expanded economic activity" - how / where? • No industry, no employment that leaves only housing. • Live work only delivers 5 in the monitoring - it has to come from housing. • My site is adjoining, will help a local business continue to farm/ look after animals and maintain the land for future generations. Theft and vandalism and cruelty to stock has almost ended the business. This site will allow not only housing but an agricultural business to thrive. • The Plan is not optimistic, does not plan for vibrancy - as written it merely watches the Valleys die. • The settlement limit policy/ live work allow for extensions from the settlement limit as drawn, I am only asking for the same.
Dep1321	Mr Graham Morris		333314	Object	Distribution of Overall Housing Provision	Table 5.3	<p>I consider the LDP to be unsound in parts and not fully meeting the tests as described at C4, CE1, CE2 and CE4 in the Deposit LDP Representation Form.</p> <p>My general concern relates to the settlement of Glynneath and the lack of land allocated to, and available for:</p> <ul style="list-style-type: none"> • Affordable small scale self-build development; and • Executive type housing development. <p>My specific concerns relate to Candidate Site NV2 within Glynneath and the reasons why it has been rejected as part of the LDP. In a nutshell I believe that the settlement boundary of Glynneath is too tightly drawn within the LDP (the Plan) resulting in an insufficient allocation of land for small scale affordable self-build plots and executive housing development. It is my strong view that this will not allow Glynneath as a community to reach its full potential in terms of social and economic growth over the 15 year period of the Plan.</p> <p>Section 7.04 (objectives) of the Settlement Paper states:</p> <ul style="list-style-type: none"> • <i>"In addition, the following two area based objectives have been developed. Reinvigorate the valley areas and improve</i>

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							<p><i>economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth".</i></p> <p>In my view the Plan as it stands does not go far enough to help enable and ensure that Glynneath is reinvigorated. I detail the reasons for this below.</p> <p>The research and analysis undertaken by the LDP team is generally thorough and I recognise that they have had an unenviable task in putting together such an enormously wide ranging Plan. Whilst there is a commitment to the social and economic development of Glynneath within the Plan, and this is to be applauded, I do not consider enough thought has been given to outcomes as regards small scale housing and executive type development.</p> <p>Section 5.05 (Summary of Consultation Responses) of the LDP Settlement Paper states:</p> <ul style="list-style-type: none"> <i>"There is a need for more building plots within settlement limits that are able to accommodate 1 or 2 houses and there is a shortage of executive housing. Failure to allow the development of more potential single building plots will serve to dramatically worsen the position over the Plan period".</i> <i>"Adequate provision should be made within the LDP for small scale house building that would be carried out by local developers to meet localised demand. Settlement boundaries should be drawn realistically to accommodate these opportunities".</i> <p>Despite the consultation these responses appear to have not been taken fully into consideration in the LDP and it is not clear why this is so. In this respect it has to be said that LDP policies and allocations do not logically flow nor can they be said to be founded on a robust and credible evidence base as it would appear, certainly in relation to Glynneath, that these consultation responses have been ignored.</p> <p>The allocations of land for the certain types of housing as I describe are not sufficient or realistic and could actually contribute to the stagnation and decline of Glynneath as a valley town, district centre and community over the next 15 years. I do not feel enough attention has been given to understanding or appreciating the full needs of the Glynneath area in this regard and the resultant LDP allocations and outcomes are really very disappointing.</p> <p>Historically there has always been a severe shortage of self-build and executive type housing development within Glynneath caused by lack of available building plots and this has been overlooked in the UDP and now the LDP. In other areas of the valleys within NPTCBC planners have encouraged and allowed development of self-build and executive type housing plots as evidenced in Bryn, Clyne and Crynant. Glynneath should not be treated any differently. There is inconsistency in the LDP in this respect.</p> <p>Whilst the plan recognises that Glynneath needs better quality housing when you look at the potential building land suitable for small scale building plots within the LDP settlement boundary it is almost impossible to find any. I built my own home at Maes y Berllan in Glynneath almost 30 years ago and even then it took me 6 months to proactively find a suitable plot. The situation has been chronic ever since and in 2013 people here still do not have a sufficient choice of affordable land on which to self-build or of high end quality executive housing.</p> <p>In the autumn of 2012 I undertook some research in this respect, as further evidence to support my candidate site submission NV2 and e-mailed it to the LDP team. This is what the local estate agents said in response to my enquiries about the availability of building plots in Glynneath. The specific question I posed was:</p> <ul style="list-style-type: none"> <i>"I am wondering whether you have any individual building plots for sale within Glynneath, near Neath. Please supply details. Note that I am only interested in Glynneath itself. How often do building plots come on the market in Glynneath itself? Many thanks".</i> <p>Responses:</p> <ul style="list-style-type: none"> <i>Peter Alan "We don't get many plots come up in Glynneath that often". Only one plot available at Heol y Glyn £99,995.</i>

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							<p><i>(In my view this plot is well overpriced being on a busy, noisy inter valley main road, not an attractive option to most people).</i></p> <ul style="list-style-type: none"> • <i>Peter Morgan "We currently have a building plot in Resolven but none in Glynneath".</i> • <i>Astleys "Unfortunately we do not have any building plots available in Glynneath, only Cwmgwrach. If any plots become available I will contact you". (I have had no contact since)</i> • <i>Clee Tompkinson Francis "We've had 2 plots in the last two years. I had a phone enquiry last week with a view to valuing a plot in the Glynneath area. If we are successful in getting this listing I will let you know." (I have had no contact since).</i> <p>I have this e-mail evidence available if required for inspection.</p> <p>For a town the size of Glynneath with around 3,500 residents, it can be seen that the number of building plots available, only one in the autumn of 2012, is abysmally low.</p> <p>The lack of such housing in the area prevents residents with the necessary financial resources moving up to a higher quality of home within Glynneath. The end result is that some residents are denied the opportunity to build, or move to, their dream homes and move elsewhere to achieve their objectives. This has a negative impact on the social and economic well-being of Glynneath as more affluent and professional people move away from, or are not attracted to move into, the area. It also results in a lack of individually designed housing stock.</p> <p>The effect of not increasing settlement boundaries severely reduces flexibility and constrains development as regards the provision of land for the need I describe. The impact for Glynneath is potentially serious as a stranglehold is effectively being placed on future potential development and economic growth. Large areas of Glynneath within the settlement boundary are, according to the Environment Agency, liable to flooding and this places further constraints on development.</p> <p>Section 9 (Strategy) of the Settlement Paper states:</p> <ul style="list-style-type: none"> • <i>"When considering revisions to settlement limits the Council will fully consider the requirements of National Policy in respect of issues such as flooding, nature conservation, previously developed land etc. It will also ensure that sites are well served by infrastructure and would not impose unacceptable pressures on local communities or its linguistic balance".</i> <p>Logically this suggests that settlement boundaries should be increased to compensate for the inability to develop areas of land within an existing settlement. Yet this has not been done for Glynneath. It has to be argued that the allocations for housing development do not reflect this or logically flow from the findings.</p> <p>When the latest settlement boundary is compared to the UDP settlement boundary it can be seen that the settlement boundary for Glynneath has not been extended at any point. In fact the LDP settlement boundary has been tightened, effectively reducing the land available for development. Clear evidence of this exists on land between the B4242 and the Ynys Cadwyn housing estate that under the LDP is no longer available for housing development.</p> <p>Whilst there is provision for larger scale housing developments within the LDP there are no defined areas for the smaller scale self-build and executive type housing developments that are very much needed. Indeed for the whole of the Neath Valley the LDP contains provision for 85 houses on small sites (less than 10 houses) for 8 communities. The major problem here is that the 85 allocation is for the whole of the Neath Valley and it is not obviously possible to allocate numbers to each of the 8 communities the spatial area contains. Assuming that the population of Glynneath roughly equates to the total of all the other 7 communities' populations then Glynneath should be entitled to 43 of the 85 units allocated. Over the 15 year period of the Plan then this is an average of 3 houses, which I would regard as entirely for self-build or executive housing, a year. This level of allocation is very obviously inadequate for an important hub district town of around 3,500 residents.</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>There are obvious errors within the LDP - Page 122 Table G2.</p> <ul style="list-style-type: none"> Glynneath shown as served by a mobile library when it has a permanent library. Glynneath shown as not having a doctor's surgery when it has a permanent doctor's surgery. <p>These are fundamental errors, the final settlement paper does not appear to have been thoroughly proof read or the research has been inadequate.</p> <p>Having lived in Glynneath for 56 years then I feel I know the area well and have considerable local knowledge. I have looked in depth at the LDP settlement boundary plan and the potential single / small scale building plots / sites within the settlement limit and I struggle to find no more than two that might accommodate two houses. This suggests that during the 15 year life of the Plan there is very little potential to develop any self-build plots in Glynneath. This cannot be just or fair. It is no use suggesting that larger scale sites allocated to housing within Glynneath, such as the Park Avenue site for 150 houses, featured in the Plan will meet all need or demand for all types of housing. In general, the owners of such large sites have no interest in selling land for individually designed affordable self-build plots; rather they will sell land for the highest amount and developers will cram in as many new houses as possible on such sites. The usual way for a self-builder to design and build his/her own home is to purchase a single building plot and these by their very nature of design tend to be of a larger size than plots found on housing estates.</p> <p>The policy on extension of settlement limits defined within the plan at section 9.0.2 states (in part): <i>"Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the settlement hierarchy will be acceptable in principle. Outside settlement limits, development will only be permitted under the following circumstances:</i></p> <ol style="list-style-type: none"> <i>It constitutes a sustainable small scale employment use adjacent to a settlement limit or;</i> <i>It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only"</i> . <p>This policy is absolutely rigid and cannot be regarded as being flexible in relation to small scale housing use adjacent to settlement limit. It allows, quite rightly, for development of sustainable small scale employment but fails to mention sustainable small scale housing. Circumstances will undoubtedly change over the 15 year period of the plan but such rigidity removes any flexibility of approach.</p> <p>Yet flexibility of approach is emphasised within the Plan. Section 6 (Issues to be addressed) of the Settlement Strategy states:</p> <ul style="list-style-type: none"> <i>"Pontardawe and the Upper Neath Valley will be identified as strategic growth areas in the valleys in order to create a mechanism to coordinate investment and ensure the benefits of growth and regeneration are shared more widely throughout the valley communities; and a flexible approach to development will be applied in the valley communities"</i>.
Dep839		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Distribution of Overall Housing Provision	Table 5.3	<p>Assessment of the Spatial Options</p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. In doing so, the strategy:</p> <p><i>"...focuses on the Coastal Corridor and Valley areas within a different context to reflect their varying potential to accommodate new development."</i> (Deposit LDP paragraph 2.5.7).</p> <p>In doing so, the Deposit Plan acknowledges that the 'majority of investment will continue to be along the M4 corridor'. This strategy is broadly supported, as it recognises the need to achieve a balance in terms of housing provision, and in particular to focus new development in the M4 corridor, whilst at the same time ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>It is also noted that a mixture of brownfield and greenfield sites will make up the housing supply, as confirmed within the Deposit Plan as follows:</p> <p><i>"The housing supply within Neath and Port Talbot will be made up of brownfield re-development, greenfield sites and existing commitments, with the regeneration of brownfield land being balanced against the release of greenfield areas. In releasing sites for development, the strategy provides sufficient and viable housing sites that seek to maximise the potential to achieve affordable housing."</i> (Deposit LDP, paragraph 2.5.22)</p> <p>Support is given to the Plan's recognition that both brownfield and greenfield sites have a role to play in providing a range of sites and choices that can provide for the Council's housing supply. However, it should be noted that an appropriate balance between the two is required, in order to ensure that sites are brought forward for development. In particular, brownfield sites generally have greater site constraints and can often be associated with significant remediation costs. This can have significant impacts on the viability and deliverability of developments, and can lead to a significant reduction in the ability of the site to contribute towards planning obligations such as affordable housing etc.</p> <p>Accordingly, in order to balance this, a greater range of greenfield sites should be allocated within the Plan in order to ensure the deliverability of sites, and also to provide greater likelihood for developer contributions - particularly for the provision of affordable housing. An appropriate balance between brownfield and greenfield site allocations therefore needs to be provided, with consideration given to allocating additional greenfield sites in order to meet the overall shortfall and to aid delivery of housing development.</p> <p>Assessment of Port Talbot Spatial Strategy Within the Deposit LDP, it is noted that 27.2% (2460 dwellings) of the total housing requirement is directed to Port Talbot. General support is given to this 'weighting' of housing numbers, as it recognises the importance of the Port Talbot area as an area where growth should be focussed. It is however observed that the 48.4% allocated to the Neath spatial area is significantly higher than Port Talbot. We consider that a more equitable split would be appropriate.</p> <p>Furthermore, it is noted that the Deposit LDP directs a lower proportion of housing numbers to the Port Talbot area in comparison to the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012). In particular, within the Stakeholder Proposals Report (October 2012), 32.9% of the total housing requirements were directed to the Port Talbot area, which represented a total of 2918 dwellings. The current Deposit Plan therefore directs over 450 less dwellings to the Port Talbot area than the previous version of the Plan.</p> <p>This reduction in the proposed housing provision for Port Talbot is considered to represent a material difference, which is likely to result in the housing needs of the Port Talbot area going unmet over the plan period. Accordingly, an increase in the housing numbers directed to Port Talbot is required in order to ensure that the Plan adequately provides for the needs and requirements of the spatial area - a spatial area</p> <p>In terms of the housing supply for Port Talbot, it is noted that this is comprised of the existing landbank, new allocations, small sites and a windfall allowance. It is noted that unlike the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012), a percentage of the Coed Darcy development has not been allocated directly towards Port Talbot's housing supply. However, the 322 units from Coed Darcy which were previously allocated towards the Port Talbot Housing Supply have in effect been removed from Port Talbot's housing supply altogether and placed into Neath's housing supply - which partly explains the reduction in the percentage of units provided for within the Port Talbot spatial area when considered against the previous Deposit Plan Proposals Report (October 2012).</p> <p>Whilst support would be given to the removal of an apportionment of the Coed Darcy development from Port Talbot's housing figures, the Deposit LDP has, in effect, not done this, as there has been no resulting increase in other allocations within the Port Talbot area. Accordingly, it is apparent that the Deposit LDP still considers that Coed Darcy will provide for a significant proportion of Port Talbot's housing requirements. This is confirmed within the Population and Housing Topic Paper (August 2013), which states the following:</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p><i>"The Strategic Regeneration Areas (SRA) located at Coed Darcy , Neath and Harbourside, Port Talbot will by virtue of their scale and location, particularly in the case of the former, help to meet the future housing needs of the County Borough as a whole. The impact the SRA sites will extend beyond their immediate areas and spatial area boundaries. "</i> (Paragraph 9.5.10)</p> <p>It is considered that this share of the Coed Darcy allocation should not form any part of the Port Talbot housing figures, and that there is the potential that due to this, the Port Talbot Spatial area will be underprovided for in terms of housing provision over the Plan period. In particular, it is considered that it is more likely that Coed Darcy will absorb a proportion of Swansea's housing requirements over the Plan period, due to the close transport links between Swansea and the development site, and the major developments which are likely to come forward to the east of Swansea and close to Fabian Way, which will further shift the focus towards the eastern edge of Swansea. It is therefore considered that Port Talbot will suffer from a shortfall of housing provision over the Plan period.</p> <p>In addition, it should be noted that the LDP, as a whole, overestimates the number of houses that will be provided on Coed Darcy over the Plan period. In particular, over the Plan period (i.e. 2011 - 2026) the Deposit LDP confirms that a total of 2150 dwellings will be brought forward on Coed Darcy - this is considered to be a significant overestimation of the level of development which will take place on the site.</p> <p>It is estimated that Coed Darcy, at its height, will have a build rate of 120 - 150 dwellings (maximum) per year (regardless of the number of house builders). However, it will take 3 / 4 years to reach that level of output. It is likely that there will be very few completions on Coed Darcy in 2013, with completions generally only from 2014 onwards. Therefore, it is likely that there will be only 12 full years of house building over the Plan period (i.e. 2014 - 2026).</p> <p>Accordingly, as a best case scenario, and based on maximum annual build rates (i.e. 150 units per year), Coed Darcy will generate only 1800 dwellings over the Plan period. A more likely scenario, is that the development will generate 120 units per annum, which equates to 1440 dwellings over the Plan period. Accordingly, whilst the allocation of 1828 dwellings for Coed Darcy within Neath may potentially be considered to be appropriate, the allocation of 322 dwellings for Port Talbot is an over-allocation, which in practice, will not be delivered over the Plan period. It should also be noted that the estimation of Coed Darcy providing 1800 dwellings over the Plan period is optimistic in itself, and should therefore be considered as the maximum, rather than a minimum or average supply.</p> <p>This likely lower delivery rate at Coed Darcy is considered to be more a product and result of the site itself - known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. It is expected that house builders will be prepared to run, and will indeed demand, a range and choice of sites throughout the county borough to meet their needs. The Coed Darcy development / site has a unique and particular character and concept that will serve only part of the housing market in the County Borough. Coed Darcy is located on the western extremity of the Plan area and firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment'. This makes a compelling case for the allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on (and indeed exposed to the performance of) one particular scheme, within one particular geographic location.</p> <p>The Coed Darcy element of the Deposit Plan's housing numbers should therefore be reduced in order to accurately reflect the level of development which is likely to come forward over the Plan period. In addition, additional sites should be allocated within the Port Talbot spatial area to ensure that there is no housing shortfall over the Plan period and that Port Talbot's needs are met by its own sites and allocations.</p> <p>Furthermore, it is considered that the balance between brownfield and greenfield allocations within the LDP, and within the Port Talbot Spatial area is too heavily weighted towards brownfield sites. An over reliance on brownfield sites will not offer the greatest choice to residents, as it provides only very limited options for housing development - the range and choice of sites being very similar in location and character.</p> <p>In addition, it is considered that the potential for developer contributions on brownfield sites would be much lower than those</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>likely on greenfield sites, as there is more likelihood on previously developed land for additional development costs, due to site constraints etc. Such a situation results in lower development margins and less opportunity for developer contributions due to scheme viability etc. In this regard, greenfield sites would provide a relatively straight forward form of development, with less unknown costs, and therefore a greater likelihood for developer contributions. It is therefore considered that an increase in greenfield sites within the plan will ensure that the proposed contribution levels are better achieved.</p> <p>Likewise, site constraints on brownfield sites can often lead to delays in developments coming forward, which could have a significant impact on the ability of the Plan to provide and deliver the required housing levels. Greenfield sites however are generally less constrained and can often provide for development earlier in the Plan period. Additional greenfield allocations are therefore required in order to ensure that there is an appropriate balance between brownfield and greenfield and to ensure that the Plan is able to deliver the required housing provision.</p> <p>In this regard, Integrel Geotechnique have undertaken a review (on behalf of the Homes Builders Federation) of the typical abnormal development costs for brownfield sites in South Wales. They estimate that the total cost of remediation / reclamation works and abnormal associated with the redevelopment of brownfield sites for housing would be between circa £175,000 and £325,000 per acre.</p> <p>These additional remediation works therefore represent significant abnormal costs which could impact on the viability and deliverability of brownfield sites, in addition to reducing the ability of sites to provide financial contributions and affordable housing. A reliance of brownfield sites will therefore likely lead to a slower rate of delivery of units - something which has been found within Caerphilly CBC, who are requiring to undertake a review of their brownfield- focussed LDP only 3 years after its adoption (as discussed in further detail above).</p> <p>Greenfield sites, which have less site constraints and therefore less associated abnormal and development costs, therefore provide more straight forward, deliverable and viable development sites. An appropriate balance if greenfield and brownfield sites are required to be provided to ensure that site's do come forward for development across the plan period to provide for assessed housing needs.</p> <p><i>Proposed Housing Allocations</i></p> <p>Within Policy H1 Housing Allocations, the Deposit Plan has proposed a number of residential allocations across the plan area which the Council consider are capable of providing the Plan's housing supply.</p> <p>It is considered that a number of the proposed sites are likely undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units within Neath Port Talbot over the plan period.</p> <p>In order to demonstrate this, a comprehensive account and critique of all sites that have been put forward for inclusion within the Deposit LDP and that fall within a core market search area has been undertaken. This core market search area, despite being defined with reference to market 'appeal' still covers a predominant part of the Plan area, and moreover and more importantly, contains the majority of the housing allocations (those falling within the main settlements / core part of the Plan area).</p> <p>These schedules (one relating to the Neath and Pontardawe Housing strategy areas and the other to Port Talbot) have been compiled in order to provide an objective assessment of the deliverability of the housing land supply position put forward by the Deposit Plan.</p> <p>As the schedules outline, there are a number of constraints on a number of the sites proposed for allocation within the Deposit Plan, which reduces the potential of these sites to contribute towards housing provision over the Plan period. Indeed, it is considered that a number of these sites will prove to be undeliverable over the Plan period, leaving the area at risk of being under-provided for in housing needs terms.</p> <p>As can be seen and noted, based on identified site constraints, we have estimated a maximum and minimum site yield for all of</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT																												
							<p>the sites. In summary, therefore the review confirms the following:</p> <ul style="list-style-type: none"> • For the Port Talbot Spatial Area, the LDP identifies that the sites will yield a total of 1960 units. • Having regard to relevant site constraints, we estimate that the sites in Port Talbot will yield between a maximum of 1769 units and a minimum of 1395 units. • In the Port Talbot Spatial Area there is therefore considered to be a shortfall of between 191 and 565 units. • For the Neath and Pontardawe Spatial Areas, the LDP identifies that the sites will yield a total of 4149 units. • Having regard to relevant site constraints, we estimate that the sites in Neath and Pontardawe will yield between a maximum of 3586 units and a minimum of 3091 units. • In the Neath and Pontardawe Spatial Area there is therefore considered to be a shortfall of between 563 and 1058 units. • Across the Authority, we therefore estimate that there is a <u>shortfall of between 754 and 1623 units.</u> <p>For clarity, the above is summarised within the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2"></th> <th rowspan="2">LDP Site Yield</th> <th colspan="2">Our Estimated Site Yield</th> <th colspan="2">Estimated Shortfall</th> </tr> <tr> <th>Minimum</th> <th>Maximum</th> <th>Minimum</th> <th>Maximum</th> </tr> </thead> <tbody> <tr> <td>Port Talbot Spatial Area</td> <td>1960</td> <td>1395</td> <td>1769</td> <td>191</td> <td>565</td> </tr> <tr> <td>Neath & Pontardawe Spatial Areas</td> <td>4149</td> <td>3091</td> <td>3586</td> <td>563</td> <td>1058</td> </tr> <tr> <td>TOTAL:</td> <td>6109</td> <td>4486</td> <td>5355</td> <td>754</td> <td>1623</td> </tr> </tbody> </table> <p>The enclosed schedules therefore clearly raise considerable questions over the deliverability of many individual sites, and by association, the cumulative numbers / supply envisaged by the Deposit Plan. Accordingly, it is considered that there is a clear need to allocate additional deliverable sites in order to ensure that the Plan is able to provide the required level of housing provision.</p> <p>It is therefore considered that a wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period.</p> <p>The proposed sites located at Coed Hirwaun are considered to provide for such delivery. The sites represent a suitable, appropriate and deliverable option for development within the Port Talbot spatial area which will ensure that the area is adequately provided for in terms of adequate housing provision over the Plan period. The suitability of the Coed Hirwaun / Margam Village opportunity that is being presented as an Alternative Site is discussed further below.</p>		LDP Site Yield	Our Estimated Site Yield		Estimated Shortfall		Minimum	Maximum	Minimum	Maximum	Port Talbot Spatial Area	1960	1395	1769	191	565	Neath & Pontardawe Spatial Areas	4149	3091	3586	563	1058	TOTAL:	6109	4486	5355	754	1623
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Dep1314	Mr Cledwyn Edwards	Tonmawr Rugby Football Club	588833	Object	Distribution of Overall Housing Provision	Table 5.3	<p>We wish to see the site included within the settlement limits (Policy SC1 and Proposals Map) and subject to a housing land allocation under Policy H1.</p> <p>The future development potential of the land, which was identified within the UDP settlement limits, needs to be safeguarded, as a future housing scheme would not only provide a range and choice of new dwellings and contribute to the regeneration of the village, but receipts from the sale of land would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches.</p> <p>It is noted that no new housing allocations are proposed in the Afan Valley area (Table 5.3) with only allowances for windfall and infill developments which amount to some 1.4% of the total housing development proposed in the County Borough as a whole.</p> <p>This is clearly inadequate, as in the other valley areas such as the Neath Valley, future growth is linked directly to tourism and</p>																												

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							employment initiatives. The Afan Valley has a growing reputation for cycling and other activities and provision should be made for appropriate development which will be attracted by the raised profile of the area. Various recreational initiatives, such as that proposed by Tonmawr Rugby Club, will also build on the leisure and tourism offer of the area.
Dep1261	Mr Brian Gibbons	Joint Cymmer & Gwynfi Labour Parties	791350	Object	Distribution of Overall Housing Provision	Table 5.3	<p>On behalf of Gwynfi and Cymmer Labour Party branches, I am writing to express our concern at the proposed provision of new housing in the Upper Afan Valley in the LDP.</p> <p>We feel this provision is too small considering the length of time the Plan will be in operation.</p> <p>The Upper Afan Valley is losing population and the Plan should be more proactive in addressing this rather than restricting the building opportunities that will be available.</p> <p>On the other hand, it is important that the locations outlined for future housing are sensible and not to be intrusive on others as well as being realistic in terms of building feasibility.</p>
Dep1312		Development Securities	589615	Object	Retail Hierarchy for Neath Port Talbot	Table 5.4	<p>This Annex sets out the detailed case in support of these representations.</p> <p>It provides both a critique of the current provisions of the plan, and suggested changes to its content.</p> <p>The representations are structured as follows:</p> <ul style="list-style-type: none"> • Consideration of retail issues of Deposit LDP Proposals report. • An Assessment of the characteristics of Baglan Moors District Centre / Retail Park. • Requested / recommended changes to the Plan. <p><u>Consideration of Retail Issues of Deposit LDP</u></p> <p>It is indicated in the LDP that the UDP retail hierarchy has been reviewed to ensure that it reflects the current role and function of the retail centres. It is further recognised in paragraph 5.2.35 that the LDP's strategy is to support the existing retail centres through the protection and encouragement of retail provision in appropriate locations.</p> <p>In the Deposit LDP, the existing Baglan Moors District Centre (as allocated within the current adopted UDP as a district centre) which comprises of the Morrison's Petrol Station and Food Store, and the adjoining retail park and public house / restaurant, is not allocated as forming part of the retail hierarchy . There is however no explanatory text in the Deposit LDP to indicate how these retail parks would function in terms of the range / type of retailing that would be considered acceptable. Furthermore there is no commentary or justification within the Retail Topic Paper (August 2013) as to why the existing Baglan Moors District Centre should be removed from the retail hierarchy.</p> <p>It is considered that the current district centre allocation in the UDP recognises the status / importance that the district centre and retail park plays in meeting the retail and service needs of the local population - in that it is a more preferable location for retail growth over other out of centre locations outside of the town, district and local centres, it is considered that it should still be allocated as a district centre in its entirety. This is due to the site specifics considerations that we have outlined as part of our previous representations (and again covered in further detail below) and to reflect the significant level of housing growth that is proposed within the vicinity of Baglan Moors District / Retail park over the LDP plan period. The proposed housing allocations within the Deposit Plan Proposals Report include:</p> <ul style="list-style-type: none"> • H1/LB/15 Stycyllwen - 24 dwellings • H1/LB/16 Abbotsmoor - 42 dwellings • H1/17 Harbourside - 520 dwellings • H1/18 Afon Lido - 150 dwellings • H1/20 Purcell Avenue - 115 dwellings

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<ul style="list-style-type: none"> • H1/21 Morfa - 10 dwellings • H1/22 Tir Morfa - 75 <p>Within the Deposit LDP, due to the removal of currently allocated the Baglan Moors District Centre, there is not a district centre within close proximity to serve the retail and service needs of the existing / future population. Within the GA retail study it is confirmed that currently 36% of the residents within the Port Talbot area shop at Morrison's within the Baglan Moors District Centre for their main food shop. This evidences the fact that the current district centre is well used, and that there will be a significant number of linked trips with the other retail shops located within the wider retail park. Accordingly, it is considered that there is a sustainability case for the retention, and widening, of the district centre designation. It is within an easy walking distance of both existing and proposed housing, and it has good public transport links to the wider area.</p> <p><u>Assessment of the characteristics of Baglan Moors District Centre / Retail Park</u></p> <p>As outlined within the submissions previously made to the emerging LDP, the Baglan Moors District Centre, as designated in the adopted Neath Port Talbot Unitary Development Plan (2008), contains a Morrison's foodstore and associated petrol filling station only. At present the designated District Centre does not include any further retail uses (or complementary non-retail services) as appropriate to its role and function as a District Centre an in accordance with the definition of a District Centre outlined in TAN4.</p> <p>In order to ensure that the Baglan Moors District Centre is able to operate as a District Centre as intended within the UDP (i.e. providing a wider selection of services and facilities to serve a range of retail and non-retail needs for local residents within surrounding communities), our previous representations to the emerging LDP have outlined that it should be extended to include the adjoining retail park - not least as it is evident that these uses and facilities already operate and function as a District Centre at present. All of these constituent parts are linked by public footpaths and underpasses linking to the surrounding residential community.</p> <p>Additionally, a planning permission has recently been granted for a public house / restaurant at land to the south of the Morrison's foodstore and north-east of the Baglan Bay Retail Park (Planning Application Ref P/2011/0260). The proposed public house will serve people using the facilities at the Baglan Bay Retail Park and the designated Baglan Moors District Centre, as well as people living and working within the surrounding area. The public house will therefore operate as a complementary use, appropriate to the role and function of the wider District Centre.</p> <p>Furthermore, the Baglan Bay Retail Park has an extant / implemented permission for a chemist / pharmacy - which is considered to represent a further complementary use appropriate to a District Centre, catering for the day-to-day needs of the surrounding community. This is over and above the integrated health centre to the north of the Morrison's foodstore - which serves as a facility for the wider residential area/community, and which draws significant foot fall to the immediate locality.</p> <p>The district centre and retail park is positioned in a sustainable and highly accessible location, which can be easily and conveniently accessed by a range of transport modes including public transport, walking and cycling, serving the needs of the surrounding community going forward over the plan period. In this regard, it should also be noted that the district centre and retail park is highly accessible on foot by residents living within the surrounding communities, in light of excellent pedestrian permeability to / from the site to adjoining residential areas. The district centre and retail park is positioned in a sustainable and highly accessible location, which can be easily and conveniently accessed by a range of transport modes including public transport, walking and cycling, serving the needs of the surrounding community going forward over the plan period. In this regard, it should also be noted that the district centre and retail park is highly accessible on foot by residents living within the surrounding communities, in light of excellent pedestrian permeability to / from the site to adjoining residential areas.</p> <p>In light of these factors, the allocation of the District Centre should be 'rolled forward' into the LDP and the boundary extended accordingly to reflect the way it currently operates/functions. This will ensure that the centre can operate as a District Centre in the wider sense of the definition, to serve the needs of the current and expanding urban settlement.</p> <p><u>Requested / Recommended Changes to the Plan</u></p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit LDP subject to these representations, and which are considered to need amendment are:</p> <p>Retail Hierarchy table 5.4 - Land comprising Morrison's foodstore and petrol filling station (i.e. current District Centre boundary); and land comprising Baglan Bay Retail Park; and land to be developed for public house / restaurant use (located to the south of the Morrison's foodstore and north-east of the Baglan Bay Retail Park) be allocated as a district centre in the LDP.</p> <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep792	Mr Mark Newey	Welsh Government	211935	Object	Monitoring Framework	Table 6.2	<p>The mechanisms for implementation and monitoring need to be sufficiently clear and sensitive to provide an early alert to avoid non-delivery. An appropriately transparent and comprehensive monitoring framework should be an integral part of the LDP. Further refinement is necessary to address:</p> <ul style="list-style-type: none"> • The phasing of housing sites and how shortfalls in housing delivery, particularly on key housing sites, trigger consideration action/plan review. • The relationship between the uptake of employment land and housing provision. • How the affordable housing policy is monitored to adapt to changing economic circumstances, ensuring the financial viability of sites remains positive. • The framework does not appear to be sufficiently clear, for example with regard to the monitoring targets and trigger points for review. • Where appropriate core indicators can be amended to reflect local circumstances. • The actions fail to provide clear actual/specific triggers for action, and many actions are vague. The monitoring framework contains many cross references in the actions column to strategic policies. Actions should be clearly specified within the monitoring framework. • A lack of specified targets and triggers within the framework for SPG and development briefs, upon which delivery of the strategy is crucial.
Dep703	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	<p>Page 90/91 / Policy SP2 / LDP Policy SP10 & SP20</p> <p>There is no reference to the pollution levels associated with air quality and in particular the number of exceedences which are linked to The Port Talbot Air Quality Management Area.</p>
Dep704	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	<p>Page 93/94 / Policy SP5 / LDP Policy SP7</p> <p>We question the integrity of the indicators for this scheme as to set aims and targets for a proposal (subject to flood risk & air quality issues) may not be deliverable and could be seen as premature.</p>
Dep705	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	<p>Page 108 / Policy SP 12 / LDP Policy R1/3 / Harbourside Development</p> <p>We question the integrity of the indicators for this scheme as to set aims and targets for a proposal (subject to flood risk & air quality issues) may not be deliverable and could be seen as premature.</p>
Dep706	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	<p>Page 109 / Policy SP13 / LDP Policy TO 1/3</p> <p>The target for the Rheola development site may be impacted upon/constrained by flood risk. We also consider the core indicator incorrect as it refers to the " <i>amount of major retail, Office and leisure development permitted in town centres expressed as a percentage of all major development</i>".</p>
Dep707	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	<p>Page 111 / Policy SP15 Biodiversity & Geodiversity / To protect nationally and internationally designated sites</p> <p>We welcome the inclusion of a target in relation to <i>Strategic Policy 15 - Biodiversity and Geodiversity</i> to protect national and</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							international designations. However, for improved clarity we recommend that the associated action should be replaced with: - 1 development permitted contrary to the advice of Natural Resources Wales.
Dep710	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	Page 112 / Policy SP 16 / LDP Policy EN 9 There is a significant omission in this indicator/target as there is no reference to the Port Talbot Air Quality Management Area. We appreciate that to develop a core measurement indicator for this Policy is extremely difficult to reflect the true picture of air pollution and its causes within the central Port Talbot area. However your Authority is aware that the PM10 levels must not exceed the relevant daily mean limit value and the Neath Port Talbot draft Airwise document confirms this position. Additionally we suggest that we develop a joint core indicator which will be measureable but linked to the current standard and the limit value state that the daily mean concentration of 50 µg/m ³ is not to be exceeded more than 35 times in a calendar year.
Dep699	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	Page 90 / Policy SP 1 / LDP Policy SP 18 The Core Indicator purely focuses on wind turbines within the Strategic Search Areas. There are other forms of renewable energy and these could also be measured e.g. Hydro schemes; Solar Power.
Dep700	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	Page 90 / Policy SP1 / LDP Objective OB 1 The core indicator should read; <i>"The level of development granted planning permission in Zones C1 & C2 areas which is contrary to TAN 15"</i> . We do not understand the statement in the action section which says ; <i>"The policy will be re-assessed where development is permitted without mitigation measures"</i> . This needs to be clarified. The indicators fail to acknowledge the requirement of the Town and County Planning Wales Development Management Order 2012 which requires LPAs to refer/notify certain types of development to Welsh Government. Could this also be a Core indicator?
Dep701	Mr David Watkins	Natural Resources Wales	786443	Object	Monitoring Framework	Table 6.2	Page 90 / Policy SP1 / LDP Policy EN6 There is no Core Indicator for this policy. This is unacceptable and should be addressed.
Dep783	Mr Mike Webb	RSPB	420284	Object	Supplementary Planning Guidance	Table 7.1	The RSPB objects to the lack of clarity with regard to the commitment on the part of the local planning authority to produce, consult upon, and adopt supplementary planning guidance, as set out in Table 7.1. It is nor clear from this table, nor from reference contained elsewhere in the LDP to supplementary planning guidance in respect of a Baglan Bay Masterplan, whether this applies to EC1 alone, or to EC2/6 as well. The RSPB considers that the Masterplan should apply to all of Baglan Bay. Because the issue of breeding lapwings applies to Baglan Bay in its entirety, it would be logical to produce supplementary planning guidance relating to the whole site, especially bearing in mind that a strategy of developer contributions to the management of the Lapwing Compensation Site is likely to form a central plank of the way in which development and lapwing interest can be harmonised. This is contrary to the following test of soundness: CE3: The absence of clarity vis a vis the scope of the forthcoming supplementary planning guidance fails this test of soundness, as the implementation mechanism is not clear, because its geographical scope is not clearly set out. Changes Sought: The RSPB seeks an amendment to Table 7.1, viz the addition of proposed allocation EC2/6 to the cell containing the commitment

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							for EC1 to be the subject of supplementary planning guidance.

PART 2: NEW SITES

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
Dep367	Mrs A Williams		196333	Object	Housing Sites	Policy H 1	<p>Golwg-y-Bryn, Pantyffordd, Seven Sisters</p> <p>I submit an alteration of the boundaries, smaller in size, approximately 1.4 hectares and which contains no biodiversity of significant value.</p> <p>I cannot understand the logic of the LDP in not allowing large areas for potential development in Valley areas as this contradicts with the Valleys Strategy / VARPs to promote the use of housing to regenerate the Valley Communities.</p> <p>The recession is undoubtedly affecting the housing market, but with respect, the survey of housing demand has been based on assumptions and predictions. It is not factual as many things will change during the next fifteen years. The view that large building firms would not be interested in Valley sites is again challenged, as smaller local building firms would welcome the opportunity for work. I would like to address the view that people would not want to live in the Valleys: there are several, but one has to be that many of the houses are unattractive and inadequate for their needs.</p> <p>The provision of 68 houses in nearby Heol-y-Waun has not yet been taken up. Could not this site in Pantyffordd offer an alternative area for the provision of good quality, energy efficient and attractive homes badly needed in this area?</p> <p>The site faces south and is a quiet area. It has unrestricted, beautiful views and would be the rounding-off of the existing settlement. It is within walking distance to the Community Hall and Children's Play area and the surrounding countryside is dotted with footpaths, bridle paths and mountain walks. There is a Pony Club at Onllwyn and several Walking Clubs in neighbouring villages. There are both Welsh and English Primary Schools approximately one mile away in Seven Sisters where Rugby and Soccer Clubs cater for children from a young age. Seven Sisters also has a Community Centre and Short Mat Bowls Club.</p> <p>Following the closure of the collieries, Pantyffordd is one of the many villages labelled as 'unsustainable' and 'becoming a dormitory'. This being so, it is vital that the provision of extra homes be allowed. The LDP has identified the need of new smaller homes throughout the County: residents need to move from larger unsustainable homes to those that meet their needs and also those who want to upgrade their homes. The Local Authority has an obligation to address the changing needs of the Valley population, not disregard them.</p> <p>I understand the theory behind the main urban areas of Neath and Port Talbot as being the focus of much of the new housing provided over the life of the LDP for their accessibility to jobs, shops and services by modes other than the car. However, there is insufficient evidence that this will be a reality. The Valley Communities have no choice but to travel. In this day and age, 'commuting' is an acceptable way of life: the alternative being stagnation, unemployment, creating a culture of dependency. No one would want that.</p> <p>The Valleys need a more equal share-out of regeneration: the decision of not allowing more than ten houses to be built cannot be classed as reinvigoration of the Valley Communities. Unless the restrictive settlement boundaries are relaxed to allow for potential growth, they will act as the suppression of community regeneration.</p>
Dep381	Mrs E H Tipuric		785141	Object	Housing Sites	Policy H 1	<p>Land off Glynmeirch Road, Trebanos</p> <p>This application is made in order that consideration be given for the inclusion of the site shown edged red on the attached plan (Appendix 1) as being within the settlement limits of Pontardawe/Trebanos within the Local Development Plan.</p> <p>The site is located at the east of Glynmeirch Road, Trebanos with links to all the facilities this area has to offer.</p> <p>No application was made for the inclusion of the land subject of this application as a Candidate Site at the initial stage of the LDP process or as a site that should be contained within the Settlement Limits of Pontardawe/Trebanos.</p> <p>Planning History - (See Appendix 2 - Plan of Planning Approvals within the site)</p>

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							<p>The area coloured green on the attached plan has a 'Live' planning permission under planning number 2/2/91/0263/03, (see letter dated 17th March 2006 from Neath Port Talbot Council Planning Department).</p> <p>The site coloured orange on the attached plan was granted planning permission under planning number 2/2/90/0257/03 and work had commenced to keep the planning permission 'Live'. This was confirmed in a letter dated 17th March 2006 by the Neath Port Talbot Planning Department. The route of the Gas Pipeline went through the application site and as a result sterilised the site from any future development.</p> <p>An application for planning permission was therefore submitted under application number P2006/1803 (coloured red on the attached plan) for a new dwelling to replace the live consent granted under application 2/2/90/0257/03. This application was refused by the Local Planning Authority but was subsequently allowed at Appeal in a decision dated 29th October 2007 (See Appendix 3).</p> <p>An application for planning permission for residential development on the land shown coloured blue on the attached plan was submitted under application P2006/1804 . This was again initially refused by the Local Planning Authority but subsequently allowed at Appeal in a decision letter dated 29th October 2007 - (See Appendix 3)..</p> <p>The land coloured brown is the access road into the site that has also been approved and work on its construction has commenced (see letter dated 17th March 2006 from Neath Port Talbot Council Planning Department).</p> <p>Consequently there were 4 extant consents within the area edged red on the attached plan when the LDP process was commenced (but these have now lapsed). However, the principle of development on the site has been established, principally at appeal and with two 'live' consents still extant within the land edged red</p> <p>Justification for inclusion into the Settlement Limits for Pontardawe/Trebanos</p> <p>The Deposit LDP - Settlement Topic Paper (August 2013) included the following criteria for considering whether a site could be accommodated within the Settlement Boundary</p> <p><i>Stage 2: Assessing the Capacity of Land within Existing Settlements</i></p> <p><i>The second stage in the review involved assessing the capacity within the existing settlement pattern to accommodate new development.</i></p> <p><i>The initial step in this process was to incorporate any relevant boundary updates into tightly drawn settlement limits (i.e. a 'cling-film' approach). Such boundary updates involved the inclusion of the curtilages of dwellings where these were considered to be functionally and visually part of the settlement pattern and also the inclusion of any relevant extant planning consents.</i></p> <p>The site in question has two extant planning permissions as evidenced by a letter dated 17th March 2006 from the Planning Department of Neath Port Talbot County Borough Council - (See Appendix 4).</p> <p>In addition a two planning Appeals (Ref;- APP/Y6930/A/2050112 and APP/Y6930/A/2050124) granted planning permission for residential development on the land subject of appeal - Appendix 3.</p> <p>What is more significant is that the Inspector indicated in paragraph 4 of her decision letter states '<i>---.In short and long distance views, and taking account of the extant planning permission for a dwelling, which I understand includes part of the western area of the site, I saw that, with careful design, siting and landscaping, the proposal would be seen as a logical continuation of existing development and would sit comfortably and unobtrusively with the established settlement pattern'</i></p> <p>Additionally in paragraph 6 of the decision letter the Inspector states '<i>There would be no conflict with the development plan or PPW, and although the proposals would not comply with the settlement policy of the emerging UDP, they would not be materially at odds with its overall objective to safeguard the character and appearance of the area. There are material considerations that weigh heavily in favour of the appeals'</i></p>

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							<p>The same consideration should therefore be given when considering the Alternative Site for inclusion within the Settlement Limits of Pontardawe/Trebanos in the emerging Local Development Plan.</p> <p>Additionally, the Settlement Topic Paper indicated that further consideration should be given to sites that provided a natural and logical extension to settlements - these included larger scale rounding off opportunities that were logical in terms of being physically, functionally and visually related to the existing settlement pattern;</p> <p>Brownfield sites located in reasonable proximity to settlements - these included brownfield sites that were logical in terms of being physically, functionally and visually related to the existing settlement pattern;</p> <p>Candidate Sites;</p> <p>Sites with a planning history - including those with unimplemented planning permissions which had lapsed or had previously had planning permission refused but the reason for the refusal could now be overcome;</p> <p>Sites that would not result in the coalescence of settlements; and Sites that would not result in an unacceptable intrusion into the countryside.</p> <p>Again the site subject of this application satisfies the above criteria. The Inspector in the planning appeal referred to above accepted the principle of development on the site. The site is on former railway land hence it can be classified as Brownfield and it has a history of both implemented and unimplemented planning consents</p> <p>When determining the suitability or otherwise of sites for inclusion within expanded settlement limits, there are a number of factors which will ultimately influence where development can take place.</p> <p>The site is not important in environmental or historical terms and neither are there other constraints that might delay or prevent development were considered as well as those factors that may have a positive influence on where development occurs.</p> <p>The site is not within a Flood zone Areas, a Special Areas of Conservation (SAC), a Sites of Special Scientific Interest (SSSI) nor a National Nature Reserves (NNR).</p> <p>The site is located within a mining area and a mining report dated 12th July 2012 is attached at Appendix 5.</p> <p>It is considered that the site can be incorporated into the settlement pattern in this area of Trebanos without impacting on the provisions of the emerging LDP or PPW. The proposal satisfies the criteria for sites set out in the Settlement Topic Paper and for the above reasons should be included within the settlement of this part of Trebanos.</p> <p>Paragraph 9.5.2 (page 102) of the Population and Housing Topic Paper (August 2013) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) of the same Paper under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Settlement Topic Paper (August 2013)</p> <p>9.0.3 With the exception of Dormitory settlements, all settlements have defined limits. Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of</p>

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							<p>sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>9.0.4 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy, but in areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy.</p> <p>The two appeal decision referred to above and the extant planning permissions contained within the site appear to satisfy the criteria set out by the Local Planning Authority in the Draft LDP as indicated above.</p> <p>The Settlement Topic Paper (August 2013) gave an indication as to how the Planning Authority would assess the status of particular site that were to be included within Settlement Limits. These included:-</p> <ol style="list-style-type: none"> Sites that represented small scale infill opportunities. Sites with existing planning permissions that remain undeveloped. Derelict land. <p>The site subject of the current application for inclusion within the settlement limits satisfies the three criteria set out above.</p> <p>Population and Housing Topic Paper (August 2013)</p> <p>9.5.2 The majority of the new housing units will be delivered through the development of specific housing sites identified within the plan whilst allowances for the emergence of windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>Conclusion.</p> <p>The proposed site if included within the Settlement Limits will allow for the managed expansion of the settlement of Pontardawe/Trebanos in a sustainable location with good access to both the areas of Swansea, Neath and Port Talbot Town Centres and the more local available facilities.</p> <p>Development of the site would help support the facilities and services in Pontardawe/Trebanos and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth' of this particular area</p> <p>Local Planning Authority considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Pontardawe/Trebanos as defined by the Local Planning Authority and it should be included within the Settlement Limit.</p>
Dep382	Ms Annette Scale		306940	Object	Housing Sites	Policy H 1	<p>Ynysymond Road/ Wernddu Road, Alltwn</p> <p>We would request that 'Focused Changes' are made to the Local Development Plan. LDP to address its "soundness"; to confirm a flexibility of supply and to provide a variety of sites over the 'phasing in' life of the Plan. Furthermore, we consider that under the Unitary Development Plan UDP, the future needs of the Alltwn, Pontardawe area were not sustainable, whereas for the LDP to achieve its Single Integrated Plan objectives and secure the Re-invigation of the Valley at Pontardawe, the addition of our site in Alltwn is required. Alltwn as a 'Small Local Centre', is ideally placed to be a 'Healthy Sustainable Community' greatly benefiting as Pontardawe becomes a</p>

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							<p>stronger economic hub, due to the planned strategic growth and inward economic investment.</p> <p>Initially, our understanding was that some 9150 houses (LHMA) were needed to address the population growth across the County. Whilst, it has not been possible to specifically calculate the exact shortfall in Dwellings Per Hectare (DPH) per site, we believe some of the sites in the Alltwen Pontardawe area, have on closer inspection, presented with restricted access/ topographic issues and thus, are unable to yield sufficient Affordable Houses to meet the needs of the increasing population in the area, over the duration of the Plan.</p> <p>We understand that... <i>"The majority of this regeneration will be through the expansion of settlement limits on 'small sites'. Development in Pontardawe will reflect its growing status as a town and retail centre."</i>(Affordable Housing Topic Paper)... <i>"By including affordable housing within all housing developments where possible, and improving accessibility, the LDP seeks to avoid creating inequalities. It will also seek to avoid significant impacts on the linguistic balance in communities where the Welsh Language is an important feature of everyday life"</i>.(Economical Sustainable Appraisal Topic Paper) .</p> <p>Hence, we would proffer that the inclusion of our site would:</p> <ul style="list-style-type: none"> • Bring the flexibility and variety needed for 'Soundness' within the Plan; • Assist the growth projection for Affordable Housing to be achieved; • Ensure land-bank provision is secured on the Alltwen side of the valley; • Bring a more equal distribution of housing supply across both sides of the valley; • Support inward migration and stem outward migration in Alltwen; • Offer mixed use options if deemed appropriate by the NPT CBC Authority. <p>It is our intention to sell the site, kindly note that:</p> <ul style="list-style-type: none"> • We would ensure, that upon sale, that contributions would be sought from prospective developers to ensure a Welsh Language Action Plan as Alltwen is a language sensitive area; • Additionally we would secure mitigation that would address any biodiversity/ecological concerns through fiscal contingency arrangements if deemed necessary. <p>Furthermore, we consider that our site meets the following criteria:</p> <ul style="list-style-type: none"> • It is an Affordable Housing Exception Site; • Access is easily available as it is surrounded by roads and not in open countryside (i.e. not surrounded by fields); • It is not divorced from an adjacent settlement; • A Visual Splay was legally Conveyed in 1976 so access to the utilities would be made available in the event development ensued; • It is not on a Flood Plain; • It is not close to Wind Farms; • There are no Air Quality issues, noise disturbance; • There is no land contamination or stability problems; • There are no tree preservation orders to prevent removal for visibility; • Trees could be left in place for privacy for neighbours; • It does not have within the site or is close to any SSSI, SAC, NNR, RAMSAR, Ancient Monuments, Conservation Area, Listed Buildings or Common Land; • Development would neither impact on important vistas/views nor obliterate an eyesore; • It is close to employment opportunities; • Traffic flow would not be impeded by development; • Ynys Y Mond Road leads directly into Gwyn St Alltwen; • The B4219 Glais Road - A4067 approx. 1.65 miles away leading to M4 Junction 45; • It is within walking distance of sustainable essential facilities; • All three owners are in agreement that any sale of the land would be to a Local Developer in accordance with the Code for Sustainable Homes 3-6, Section S106 Affordable Housing;

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							<ul style="list-style-type: none"> • There are no restrictive covenants or tenants that could prevent the land being used; • Any alternative use would be on the advice of the Authority.
Dep383	Ms A Howells		785143	Object	Housing Sites	Policy H 1	<p>Land at the former Barracks Site, Pontrhydyfen</p> <p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the site shown edged red on the attached plan (Appendix 1) as being within the settlement limits of Pontrhydyfen within the Local Development Plan. The site is located at the south eastern end of Pontrhydyfen with links to all the facilities this area has to offer.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped.</p> <p>Planning History</p> <p>P2002/0967 - Outline - Approved 11/11/03 - (Appendix 2) P2006/1635 - Reserved Matters for 02/0967 - Approved 08/08/08 (Expired 08/08/10) - (Appendix 3) P2006/1637 - Road - Approved 11/03/08 (Expired 11/03/13) - (Appendix 4) P10/0810 - Variation of condition 4 of application P2002/0967 approved 11/11/03 regarding the period of time by which the developer must start development (Reserved Matters application P2006/1635 approved on 08/08/08) - Disposed 13/11/12. This was disposed of under Article 29 Paragraph 15 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.</p> <p>The Neath Port Talbot Unitary Development Plan included the site within the Settlement Limits for Pontrhydyfen and subsequently outline planning permission was approved for the development of the site on (App. No.P2002/0967 refers - Copy attached - Appendix 5).</p> <p>Subsequently a full application relating to the access into the site was submitted and approved by the Local Planning Authority (App. No. P2006/1637 refers) A reserved matter application was submitted for the provision of 45 houses with ancillary roadways. Was approved (App. No. P2006/1635 refers) - (Appendix 5)</p> <p>An application for a variation of a condition relating to the date of commencement for the proposed development was Finally Disposed on 13th. November 2012 (App. No P10/0810 refers (see above)</p> <p>The reason the Application P10/0810 was Finally Disposed related to the non completion of a Unilateral Undertaking for a contribution towards open space facilities in the area. The developers had been declared bankrupt and the land was repossessed by Barclays Bank and as the original applicants no longer had an interest in the land they could not sign the UU and for some reason the Bank declined to sign the UU as well. The land was subsequently sold at auction in early 2013.</p> <p>Justification for Inclusion as an Alternative Site</p> <p>The Local Planning Authority has set out criteria whereby sites capable of development for residential purposes may be considered and have indicated that preference to such allocations will require the site to be contained within Settlement Limits and also should be on previously used land.</p> <p>It is clear from the planning history and that the Local Planning authority had granted planning permission from the site but the permission</p>

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							<p>lapsed due to the non signing of the Unilateral Undertaking. The site was therefore one with planning permission when the LDP process commenced.</p> <p>In the Population and Housing Topic Paper produced by Neath Port Talbot County Borough Council there are a number of statements that support the inclusion of this site as being within the Settlement Limits. The site must be considered as a possible windfall site and Table 9.7 on page 86 of the report indicates that such windfall sites are expected to either have an extant planning permission or that planning permission has lapsed.</p> <p>Furthermore, Table 9.9 on pages 88/89 of the report identifies 'The Barracks Site' as a site with an unimplemented planning permission with a capacity for 44 units.</p> <p>Paragraph 9.3.14 states that there is not the expectation that all sites identified in the plan will deliver new housing in the future. There remains the possibility, however, that a number of the sites will be implemented and this category of development site therefore represents a significant potential source for new housing. It is considered that this is one such site.</p> <p>Paragraph 9.5.2 (page 102) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period. However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Whilst the site subject of this application was not submitted as a candidate site at the commencement of the LDP process, it nevertheless had an extant consent at that time and there was an expectation that the site would be developed and it was only due to the non completion of the Unilateral Undertaking that the planning permission was not implemented.</p> <p>Consequently no application to have the site included as a Candidate Site was made at the initial commencement of the LDP. Currently the site remains within the Settlement Limits of Pontrhydyfen under the provision of the extant development plan - the Neath Unitary Development Plan.</p> <p>Within their own report (Population and Housing Topic Paper - August 2013), the Council having identified The Barracks Site as potentially providing 44 residential units in Table 9.9 (see above) but has then excluded the site from being within the Settlement Limits of Pontrhydyfen.</p> <p>Turning now to the provision of Affordable Housing within the Draft LDP, the Council has considered the contents of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 7.47 on page 89 at Fig. 80 shows the number of houses required in the period 2011 - 2026, namely Market Housing - 4900 and Affordable Housing - 3100.</p> <p>Paragraph 7.54 indicates there is a requirement for Affordable housing across all areas of Neath Port Talbot, and given the strategic requirement identified it will be important to maximise Affordable Housing delivery wherever possible. Nevertheless, the Council will need to consider the appropriate strategy for the future housing mix in each area based on individual area profiles provided.</p> <p>The Draft LDP lists targets for the provision of Affordable Housing and it is the Authority's aim to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas.</p> <p>The LPA has reduced the Settlement Limits of Pontrhydyfen in the LDP, thereby excluding this site and as a consequence restricting the</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>number of opportunities to :</p> <p>a. Allow for controlled expansion of the village and b. Allow for a percentage of Affordable Homes to be constructed to meet local demand.</p> <p>On this last point it should be noted that whereas the previous planning permission would not have provided any Affordable Housing, The consequence of including this site within the settlement means that it would provide a percentage of Affordable Housing that would go some way to reducing the acknowledged shortfall of approximately 600 Affordable Home units identified by the Authority in Paragraphs 4.0.41 and 6.0.4 of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 6.0.5 of the same document states that the need for affordable housing remains a key issue for the Deposit Plan. This strategy is reinforced by paragraph 7.0.5 which seeks to provide additional affordable housing units throughout the County Borough and ensure new housing development makes a fair and justified contribution towards the provision of affordable housing. Although the Council has reduced the number of Affordable Homes required over the plan period from 3100 to 2500 (i.e. the 600 shortfall) it acknowledges that the Local Housing Market Assessment 2012 (see above) has identified the need for 3100 affordable units over the LDP period. Paragraph 9.0.6 states that the planning system will not be able to meet the entire need (of affordable housing) over the plan period.</p> <p>The site subject of this application has undergone scrutiny through the planning application process in 2008 when the LPA was satisfied that the relevant constraints relating to the site could be overcome and as such recommended approval of the access and layout for 44 dwelling units. Extensive consultation took place prior to any recommendation being made and no objections were received from the statutory consultees during the determination process (see copy of Officers report attached).</p> <p>Conclusion</p> <p>The proposed development if included within the Settlement Limits allows for the managed expansion of the settlement of Pontrhydyfen in a sustainable location with good access to both the areas of Neath and Port Talbot Town Centres and the more local facilities and services on offer in Pontrhydyfen. The Local Planning Authority has as recently as 2008 considered the site to be within the Settlement Limits of Pontrhydyfen and has previously granted planning permission for its development.</p> <p>Development of the site would help support the facilities and services in Pontrhydyfen and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth Area' of Pontrhydyfen.</p> <p>The Local Planning Authority's considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims and would also provide for Affordable Housing that would go some way to reduce the identified shortfall of such units within the County Borough area over the plan period.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Pontrhydyfen as defined by the Local Planning Authority and it should not have been removed from the Settlement Limit as defined in the extant Unitary Development Plan.</p> <p>ADDENDUM BY APPLICANT</p> <p>The LDP vision is to reinvigorate the valley communities. New housing is needed to support facilities and services in the communities.</p> <p>The Topic Papers state that Pontrhydyfen lies within a narrow valley which is constrained by topography. Nevertheless it is a village crying out for regeneration. Building land in the village is limited except for a 5.5 acre site previously granted planning permission for 45 dwellings that the local community supports. However due to certain circumstances the developer failed to complete a Unilateral Undertaking and the</p>

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							<p>consent was not implemented.</p> <p>The land has now been purchased at auction and its inclusion within the Settlement Limits for Pontrhydyfen will bring much needed housing, including Affordable housing to the village.</p> <p>It will also bring employment and will help sustain local businesses. The site's inclusion within the Settlement Limits will strengthen the community making Pontrhydyfen a more sustainable place for future generations and bringing positive benefits to the community.</p> <p>The site was previously occupied by approximately a dozen cottages. The usual services such as sewerage, water and electricity are available on site and the site is outside the flood zone (see attached plan - Appendix 6). It has not been identified as a site of Special Interest, it is not a conservation area and neither is it a site of special scientific interest.</p> <p>The area benefits from a deed of covenant from the Welsh Assembly Government allowing for a easement for access and a widening of the existing road for the benefit of future development (This access has the benefit of a full planning permission issued by the Local planning Authority - see above).</p>
Dep386	Mr Huw Thomas		782389	Object	Housing Sites	Policy H 1	<p>Gellifowy Ganol, Ynysmeudwy, Pontardawe</p> <p>Please find enclosed on the reverse a plan of 2 fields with an area of 3 hectares which is situated about 1.25 miles from the centre of Pontardawe Cross. I have suggested an alternative road [<i>marked green</i>] which is needed, but if other sites were considered there could be access through these sites, because Heol Las would not carry extra traffic.</p> <p>I have put a cross on an alternative site so there could be a better access into my 2 fields if houses were built on them.</p> <p>If further information is needed, please contact me on the address above.</p> <p>Add Gellifowy Ganol as a site: over 400 units identified are not in the landbank showing no evidence of delivery. This additional site is required to ensure growth is sustained over the next 13 years until 2026.</p> <p>Inadequate allocations in Pontardawe which has been identified as a Strategic Growth Area (Para. 2.3.12) and a key settlement in delivering sustainable growth - a number of the sites identified do not at present have planning permission.</p>
Dep388	Mr Paul Gregory		785354	Object	Housing Sites	Policy H 1	<p>Land north of Traveller's Well, Pontardawe Road, Pontardawe</p> <p>We would request that "focussed changes" are made to the Local Development Plan "LDP" to address its soundness, to confirm a flexibility of supply and to provide a variety of sites over the phasing in life of the plan. Furthermore, we consider that under the Unitary Development Plan UDP, the future needs of the Pontardawe area were not sustainable, whereas for the valley at Pontardawe, the addition of our site in Pontardawe is required. As a small local centre it is ideally placed to be a "healthy sustainable community", greatly benefiting as Pontardawe becomes a stronger economic hub, due to the planned strategic growth and inward economic investment.</p> <p>Our understanding was that some 9150 houses (LHMA) were needed to address the population growth across the County, whilst it has not been possible to calculate the Pontardawe area. Hence, we would argue that the inclusion of the site would:</p> <ul style="list-style-type: none"> • Bring flexibility and variety needed 'soundness' with the plan; • Assist the growth projection for housing to be achieved; • Ensure land bank provision is secured on the Rhydyfro side of valley; • Bring a more equal distribution of housing across both sides of the valley; • Support inward migration and stem outwards migration - Rhydyfro; • Offer mixed use options if deemed appropriate.

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Dep389	Mr Stephen Thomas	The Huggard Charitable Trust	704857	Object	Housing Sites	Policy H 1	<p>Bryncoch Farm, Bryncoch</p> <p>Bryncoch Farm was approved by the Planning Inspectorate during the UDP process for inclusion in the settlement area, so I object to it being maintained in the Green Wedge. Considerate development of the site would benefit the community with no adverse effect.</p>
Dep392	Mr H G Rees		785388	Object	Housing Sites	Policy H 1	<p>Rheola Estate</p> <p>Whilst the deposit plan does underline the role that Rheola Estate will play in the economic wellbeing and re-generation of the Neath Valley by way of its identification as a 'tourist-led' designation, the deposit plan ignores entirely the role that housing will play in delivery of the plan currently before the Authority in the form of an outline planning application including up to 100 houses.</p> <p>The Authority has played a major role in the development of the strategy and detail surrounding this application and that should be recognised by inclusion of a housing allocation and by reference to the housing element of the scheme at various junctures in the plan.</p> <p>The site was mentioned extensively in the pre-deposit plan as being capable of (and desirable as) host to up to 100 homes. Paragraph 2.5.49 should be amended to recognise the role that housing will play in regeneration and enabling re-development of the Estate.</p> <p>Policy SP6 (item 6) should make similar reference.</p> <p>Table 4.2 should be amended to include an allocation for Rheola</p> <p>Policy H1 should also make specific reference to an allocation</p> <p>FURTHER COMMENTS SURROUNDING THE ROLE OF RHEOLA ESTATE AS REFLECTED IN THE EMERGING PLAN</p> <p>Introduction</p> <p>Comment and objection focusing upon the treatment of Rheola Estate in the Deposit Draft of the LDP has already been submitted and recorded by the Authority.</p> <p>This brief document seeks to underpin earlier comment with further reflections upon the role that Rheola Estate should play in the strategic and practical future of the County Borough and the need to reflect that in the LDP. The document is formally submitted as an attachment to a form of representation.</p> <p>The Context</p> <p>Rheola Estate is of considerable interest from the perspectives of landscape contribution, social history, architectural importance, post-war industrial development and associated impact upon the land and the role that the Estate can play in the regeneration of the Upper Neath Valley and beyond.</p> <p>The Estate has been the subject of considerable discussion between (inter alia) officers of the Assembly Government, the County Borough Authority and the owners with a view to establishing the optimal means of enabling retention of the Estate as an important piece of social history sitting in an important landscape in a manner that assists in the economic and social regeneration of the area. These discussions were, we assume, instrumental in seeing the south-eastern part of the Estate being designated as a site suitable for combined housing and tourism development in the pre-deposit LDP.</p> <p>Discussions immediately outwith the LDP preparation process, albeit within the context established by the pre-deposit version, continued and saw the submission of an outline planning application for up to 60 houses, over 100 holiday lodges and supporting hard and soft infrastructure, all enabling regeneration of the brownfield site and the restoration of Rheola House, a John Nash-designed dwelling of acknowledged importance, and of its satellite buildings (coach house and stables, workers' cottages, ice house, etc.). The application was preceded by an extensive EIA and was accompanied by an Environmental Statement and other reports and documents that supported the</p>

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							<p>case for re-development of the site in a manner consistent with the wider strategies and objectives of the Local Development Plan.</p> <p>The Deposit Draft of the LDP relates the central strand that has taken the site to the threshold of re-development; the long-running Western Valleys Strategy founded upon a lengthy series of meetings and consultations in which the owner's agent played an active part in marrying the need for jobs and associated economic benefit with the objective of making the Upper Neath Valley an attractive place to live and to visit. However, it is our contention that the Deposit Draft fails to place sufficient and particular emphasis upon the role of housing in enabling the re-development of the whole site.</p> <p>Comment It must be said first of all that if the Plan is to be sound and suitable for guiding development over the next fifteen years it should be consistent and use contemporary Authority thinking as its cornerstone. To omit the major prospective housing site at Rheola that featured in the pre-deposit plan from the Deposit Draft is both inconsistent and, given the Authority's active participation in the discussions surrounding the application currently with the Authority calls into question the soundness and suitability of the whole Plan - having said which these comments use Rheola as an example that may not be repeated elsewhere.</p> <p>The LDP must look to take a strategic view of important, indeed pivotal, sites as they will play a hugely important role in the delivery of the aims and objectives of the LDP. In the case of Rheola its treatment in the Deposit Draft largely ignores (mentioning it only in passing in paragraph 5.1.8) the site as potentially playing host to 60 houses (a material number in the context of the projected County Borough housing requirement over the life of the Plan). It is argued that the site must be considered comprehensively, not least because by ignoring the housing component of the prospective re-development of Rheola the Deposit Draft also ignores what is a large tract of brownfield land in need of reclamation. However, the issue runs wider than what would be a contribution to one of the primary objectives of the Plan, regeneration, in that it stands to frustrate the whole development as the tourism element alone, vitally important as that is, will not sustain the restoration of Rheola House, its attendant buildings and the supporting grounds so important to what is a Landscape of Importance.</p> <p>The inconsistency is put into stark highlight by the fact that the Planning Authority agreed the scope of the Environmental Impact Assessment that preceded the planning application with the Authority (including an Environmental Statement informed by the EIA) and in doing so recognised that the impact and benefit of the introduction of domestic dwellings was an integral part of the proposal.</p> <p>Key to the further consideration of inclusion of a far more positive set of references to housing at Rheola is an analysis of the vision, objectives and core strategies running through the LDP:</p> <p>Vision</p> <p>The LDP Vision is seen, as far as the valleys and their communities are concerned, as being supported by accelerated economic activity and enhancing cultural and historic heritage. Rheola Estate offers a superb opportunity to fulfil all of these goals and the prospects of it doing so would be underpinned by inclusion of unequivocal commitment to housing that would help enable an initiative that may otherwise not be viable.</p> <p>Objectives</p> <p>Over-arching objectives OB3 and OB4, delivery of confident and vibrant communities, are better satisfied by developments of the type proposed at Rheola than they would be by the effective omission of a viable scheme and objective OB6 is also much more likely to be attained if Rheola Estate is developed, indeed all that has gone before in the Western Valleys Strategy initiate recognised this and it is argued that OB6 should make explicit reference to Rheola.</p> <p>Core Strategies</p> <p>There is little doubt that <i>growth</i> is at the heart of the emerging LDP, albeit tempered by reference to environmental, social and cultural considerations so important for rounded progress and contentment. Rheola holds out the prospect of being a major stimulant to growth, firstly in terms of the construction phase but more importantly in providing employment and attracting investment and spending power as</p>

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							<p>the development becomes an active part of the Neath Valley community.</p> <p>The plan recognises the importance of geography and sustainability (<i>spatial strategy</i>) in helping to 'drag' economic and social wellbeing into the County Borough hinterland. Rheola would represent a major component of the strategy in this respect, changing the economic centre of gravity from the M4 corridor southward to somewhere north of the M4.</p> <p>Conclusion</p> <p>Whilst supporting the emerging Plan as enshrining a strategy that will see progress but progress properly harnessed by the need to recognise social, cultural and environmental considerations, it is strongly recommended that a much more prominent role be given to the housing element of the putative development at Rheola Estate.</p>
Dep429	Mr H M Parry & Mr M C Thomas		266933	Object	Housing Sites	Policy H 1	<p>Land forming part of Pen yr Alltwen Farm, Rhos</p> <p>I act for the owners of a small parcel of land of approximately 1.8 Hectares (4 Acres), located on the western fringe of the village of Rhos that I submitted for consideration as a residential housing candidate site for inclusion in the Neath Port Talbot Development Plan. My proposal was considered but was not included in the plan. The site is identified as appraisal P59 in the plan and is shown verged pink on my attached Plan LT1.</p> <p>Scope of Statement</p> <p>My brief was to examine and report on the Council's appraisal of the proposed site; to comment on and analyse any objections and explain why I consider the site should be included in the development plan.</p> <p>The council's appraisal is totally adverse in essence and its objections relate primarily to the alleged intrusive nature of the proposal; alleged loss of 'green wedge' and claim it would contribute to the coalescence of the communities of Rhos and Alltwen. The appraisal also alleges that the site would be unsupported by services and facilities, also that it contains 'biodiversity of some value'.</p> <p>I propose to address the several objections separately as follows:-</p> <p>The 'intrusive' and green 'wedge' factor</p> <p>The distance between Rhos and Alltwen is over a quarter of a mile. This is a substantial green wedge, the effectiveness of which is greatly increased by the undulating ground and the row upon row of intervening hedges and fields, together with their substantial hedgerow trees. The overall pattern of vegetation is so unlikely to alter in the future that any loss of screening may be discounted. I present Plan LT2.</p> <p>Furthermore, the foresight in protecting these trees and hedgerows around the site with a tree preservation order will ensure this.</p> <p>The general policy of discouraging the coalescence of adjacent settlements is directed mainly against ribbon development on main routes between settlements, the development proposed us not located fronting a main route and would not in any way extend the ribbon development that already exists on the main route between Rhos and Alltwen.</p> <p>Defensible Boundary</p> <p>It must be accepted that in the process of time some land on the periphery of villages will be required to meet future housing demands which will put pressure on its visual boundaries.</p> <p>There is no clear current defensive boundary to the village of Rhos.</p> <p>What is presently accepted as a boundary comprises a topography of trees, hedges and general vegetation which exists in profusion in the landscape. A boundary is difficult to identify with precision.</p>

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							<p>What is now required is a visual 'edge' that will provide an effective and defensible boundary to the village and my current proposal for this site affords the opportunity for that to be provided.</p> <p>I produce my Plan LT 3 where I present a concept layout plan that is based on the bungalow types similar to those of the adjoining Delffordd Estate.</p> <p>This is a sketch layout in the form of two cul-de-sac; it demonstrates its flexibility whereby affordable housing may be conveniently integrated into the development.</p> <p>It is desirable that the roofs of any development on the site should be seen against a backdrop of trees and hedges. I show how this is easily achieved by the 'modelling' of the topography and planting and by the 'terracing' of the floor levels of the dwellings on the western side of the development and provides a substantial 'hedge on bank' western boundary. I present Plan LT 4.</p> <p>The Northern and Southern boundaries of the site are natural tree and hedgerow boundaries and will be undisturbed except for conservational maintenance.</p> <p>Thus the proposed site could be developed in a sensitive and reasonably unobtrusive way that would then have only a marginal effect on the policy of retaining open countryside.</p> <p>Services and facilities</p> <p>The appraisal of the proposed site (P59) boldly states that it would be unsupported by services and facilities.</p> <p>The statement is unequivocal and infers that neither exist or that they are unavailable to the development.</p> <p>The fact is that the site is very much supported by both services and facilities.</p> <p>Therefore some clarification on this point is required.</p> <p>Firstly, to understand the terms, I would suggest that a broad difference between services - as being those essential for the proper enjoyment of modern housing and facilities - as being those provided for the benefit of the community but their use is by choice of the individual.</p> <p>So to be clear on the matter I submit the following facts on each:-</p> <p>Services</p> <p>Access Road</p> <p>The proposed development would have direct access to the adopted highway Pen yr Alltwn Park Road; it is constructed of adequate and approved width to receive further development.</p> <p>Foul and Storm Sewers</p> <p>These are available for connection in the access road Pen yr Alltwn Park Road and are of adequate diameter to receive further development.</p> <p>Water</p> <p>A main water supply is available for connection in the access road and is of adequate bore and pressure to receive further development.</p>

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							<p>Electricity</p> <p>Main electricity is available for connection in the access road.</p> <p>Telephone</p> <p>Also available in the access road</p> <p>Facilities</p> <p>Public Transport</p> <p>The village is served by two bus routes of adequate frequency; one actually passes through Delffordd, the adjoining housing estate</p> <p>Shops, Post Office, Etc.</p> <p>These domestic facilities are available central to the village</p> <p>Recreation facilities</p> <p>Park and Play areas are provided central to the village</p> <p>Clearly the proposed site is supported by services and facilities and furthermore the facilities provided are no more and no less in extent and quality than those available to the site now proposed by Council for Rhos and accepted as fit in all respects for inclusion in the Neath Port Talbot Development Plan.</p> <p>Pressure on further development</p> <p>History has shown that within any locality the progress of time and a steadily improving environment creates a trend for the general population to increase. The trend is inevitable and puts pressure on the local authority for further housing development.</p> <p>A proposal for new development should not be refused out of anticipation of encouraging further development. All proposals should be judged at the time they are made and their success or failure must be decided on their necessity and planning merits prevailing at that time.</p> <p>Biodiversity</p> <p>The proposed site is approximately 1.8 hectares of grassland located on the western fringe of the existing Delffordd Housing Estate Rhos.</p> <p>The soils are shallow, very stony and limited in use to permanent grassland.</p> <p>This is consistent with its low quality, being shown as Grade 4 on the Agricultural Land Classification Map (sheet 153).</p> <p>The northern and southern boundaries are formed by trees and natural hedgerows often underlain by bracken and bramble. From my observations all the vegetation within and around the site is common to the district and my investigation revealed no rare or unusual species.</p> <p>I consider the site should be included in the Neath Port Talbot Development Plan for the following reasons:-</p> <p>Safety of schoolchildren</p> <p>The village of Rhos is divided into two areas being North and South of the A474 that passes through the village and is the main road route between Pontardawe and Neath. Both areas are primarily residential though the southern area is very much the larger of the two.</p>

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							<p>The Rhos County Primary school that serves the whole area is located in the southern area of the A474 and within walking distance of the proposed site. The mini-supermarket and Post Office are also in the southern area. The area of land presently allocated in the Neath Port Talbot Development Plan for future residential development at Rhos is located in the northern area of the A474. The result of the areas being thus separated is that children living in the northern area will have to negotiate the hazard of the A474 at least twice a day to attend the school. The same hazard will apply to the residents of the northern area when visiting the shops and post office. This hazard could be alleviated to some extent by the allocation of the proposed site as a supplement to the land presently allocated for housing in the development plan now in its consultation period. The road A474 is coloured brown on Plan LT 2.</p> <p>Loss of Agricultural Holding</p> <p>The site allocated for residential development in Rhos village comprises first class agricultural land and its development will result in the loss of a complete Agricultural Holding. Whereas the proposed site is of grade 4 land and used for general grazing. Its loss to development would have no adverse effect on the agricultural amenity of the area.</p> <p>Shortfall of development land</p> <p>I refer to the Neath Port Talbot LDP and to its tables reporting the extent of land allocated for residential development. From my understanding of the figures presented, it is apparent that the present allocation of such land will not meet the Welsh Government's requirements. It is apparently accepted by the council themselves, that the plan in its present form may therefore have a large shortfall of building plots.</p> <p>I assume the reason for shortfall may be that the council consider there is insufficient land available that conforms to the Welsh Governments particular requirements.</p> <p>In which case I respectfully ask for the alternative site I have proposed be reappraised and in the light of facts in my statement; that virtually dismiss the council's objections; be included in the plan as an alternative and supplemental site for residential development.</p> <p>Conclusion</p> <p>The proposed site does not lie within an area which has been designated as either a national park or an area of outstanding natural beauty. Neither does it lie within a green belt or within an area which is recognised as being of special landscape value. No part of the site is included within a conservation area designated under the act.</p> <p>I have shown with my attached plans and sections that the site could be developed in a way that would not be an intrusion in the landscape, would not contribute, other in the most minor way, to the coalescence of the two communities of Rhos and Alltwen nor would it lead to a loss of worthwhile agricultural land.</p> <p>Conversely, by careful siting; sensitive planting and conservation of adjoining hedgerows, the site could be efficiently developed in a sensitive, unobtrusive and acceptable manner.</p> <p>Recommendation</p> <p>I commend the site as a sustainable alternative and suitably supplemental land to that presently allocated for the Pontardawe area. I respectfully ask that it be included in the Neath Port Talbot Local Development Plan for residential development.</p>
Dep443	Mr Tony Brinkworth		218483	Object	Housing Sites	Policy H 1	<p>Land at Cydgoed Quarry, Tonna (Site 1)</p> <p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states:</p> <p>In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should</p>

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							<p>therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well-being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity.</p> <p>How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement. I have just seen my site N90 in the LDP Candidate Site Assessment Report (August 2013). The reason for exclusion from the settlement limit is that "The site lies in open countryside detached from the existing settlement, in an unsustainable location and therefore not in accordance with the settlement strategy. Parts of the site contain areas of significant biodiversity value.</p> <p>I believe they have not been comprehensive in carrying out the Assessment of site N90/218483, due to the wording "immediately adjacent to a settlement limit". Therefore my site has not been fully assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regards to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because "The site lies in the open countryside detached from the existing settlement, in an unsustainable location The Council are considering 300 houses just over 1 field away on a greenfield site - candidate site N35. I see no mention of countryside only greenfield, and no mention of unsustainable location and biodiversity value. Surely part brownfield sites should be considered first as opposed to building on higher grade land in the open countryside.</p> <p>This would allow for a full assessment to be made on Candidate site N90, for one of the first Code 6 of the code for sustainable homes to be built in Wales if not the UK with onsite renewable energy and giving a 10 acre improvement in biodiversity, on a part brownfield site.</p> <p>The Council only seem to be interested in large sites for example, 300/400 houses just only 1-2 fields away to site N90. My proposed site will be more beneficial to sustainability, climate change and biodiversity improvements than any one of these proposed houses.</p> <p>I also believe the allocation of sites are not transparent and delivered in accordance of the Delivery Agreement. Site allocations should not incline to be for large housing estates.</p> <p>Why Candidate site N90/218483 (Residential)</p> <p>To build one renewable energy generating house which will be built to code 6 of the sustainable homes. Having architectural merit and being aesthetically sympathetic to the surrounding environment.</p> <p>Brownfield Candidate site N90 is bordering Quarry Road and Cydgoed Quarry, a site of approximately 6 acres (2.4ha) of poor quality land, a brownfield site formerly a Draft Mine with associated waste to the elevated side of the sites, this mine has its entrance near the boundary of the fencing on the east side and tunnels in the direction of Danalan farm. The mound to the east can be seen to be coal waste with some builder's rubble. Some trees as can be seen on the mound have not rooted firmly into the waste. There is a small but constant flow of water at the south side from the drift mine-sealed entrance.</p> <p>Sustainable Sustainable development is the core principle underpinning planning. At the heart of Sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations.</p> <p>It is not my intension and never has been to build a concrete jungle or 150 houses as some Tonna residents have stated and been led to believe. The house could be built into the side of the mound as not to be on the sky line or even close to the trees on the boarder to help make the house blend in to the environment. Hence the house would be set into the natural folds of the landscape, with the back drop of the mound behind.</p> <p>This house would have on site renewable energy and savings in the form of: Solar rood panels, Small wind turbines, Hydro- water generating electricity, Ground source heat pump, Onsite spring water, Rain water harvesting, all of which are possible due to the terrain. Sewage treatment plant is also possible but can be connected to the main at Quarry Road/Henfaes Terrace or towards Mount Pleasant.</p>

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							<p>Implementation of Better Woodlands for Wales Management Plan, case Ref:14717 would improve the biodiversity of the bordering woodland in my ownership, and generate some 20 tonnes of waste wood every year of which some 8 tonnes would be used to create energy for the house. Wood used to partly heat the house would create zero carbon emissions. (Annex A)</p> <p>The location of the site allows for good orientation of the dwellings, to make controlled use of solar gain. Large gardens for growing fruit and vegetables, and to accommodate buried rain water tanks, and to make good use of the flowing water at the south side boundary. The site is not liable to flooding.</p> <p>The two established means of access to this site is either from Quarry Road or Mount Pleasant which have been in existence for many years, would be improved and maintained. The hedge over hanging Quarry Road would be trimmed back, and the road surface improved on both accesses.</p> <p>Using these accesses more frequently would provide better security to the surrounding houses and rugby club, also provide for better foot path surveillance on Quarry Road.</p> <p>The site can barely be seen from the local houses or RFC Clubhouse due to the tree's screening these buildings. In fact the site would be difficult to see from most directions other than a few using Quarry Road.</p> <p>The existing community has all the normal facilities including schools, churches, shops, Post Office, pubs and community centre. The bus stops are some 400metres away at Henfaes Road (B4434) and the local schools 325 metres - School Road. There would be no need to provide new facilities.</p> <p>Allocation of this under used lower grade land should be used as opposed to meeting demand by development of higher grade land in the open countryside this would increase the range of sustainable areas in which people would like to live. A horse stable could also be built.</p> <p>A completed development would not impose unreasonable demands on local services. It will help to support local shops, schools, Pubs, churches etc.,</p> <p>To develop the site would make a small but significant contribution to climate change, as the location allows for rainwater harvesting, a foul sewage treatment plant, ground source heat pumps, solar panels, and photovoltaic cells etc, even small scale wind turbine systems, could be placed upon the mound/mountain, with an input output electrical meter instead of the normal electrical meter, placed in one house. Waste wood from the surrounding area, under a Better Woodlands for Wales Management Plan, could provide renewable energy resource giving zero carbon emissions. This house will be built to code 6 for sustainable homes.</p> <p>If a foul sewage treatment plant in not acceptable to the Council a connection to the main could be made on Quarry Road or the road off Mount Pleasant leading to Quarry Road in my ownership.</p> <p>Occupation of this area would deter people from abusing the surrounding area plus it would help to reduce crime, vandalism, malicious fires, and illegal fly tipping. It would have the effect of policing the maintenance of the surrounding countryside and would provide for footpath surveillance, which would result in a safer environment for the public. It would also deter off road riding/driving of motor cycles and four wheel drive 'jeep type' vehicles, shooting of air rifles and youths damaging trees and undermining the roots making them unsafe.</p> <p>I believe that the 2 Rugby/football fields and surrounding wooded area are not owned by the school but by Council and leased to Tonna Rugby Club, with a blanket tree preservation order in place. Therefore candidate site N90 is defensible in regards to an extended settlement boundary, as it is confined within the site boundary fencing. Please see suggested new settlement boundary Plan 1, the registered site plan N90/218483 also the UDP map and the old Borough of Neath Local Plan (Inset map 3, map reference E61C).</p> <p>Finally I respectfully request that the inspector take all the information into account and conclude that there are convincing and compelling arguments for a development to be sited in this candidate site N90/218483.</p>
Dep456	Mr Tony		218483	Object	Housing Sites	Policy H 1	Land at Cydgoed Quarry, Tonna (Site 2)

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	Brinkworth						<p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states:</p> <p>In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well-being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity.</p> <p>How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement. I have just seen my site N92 in the LDP Candidate Site Assessment Report (August 2013). The reason for exclusion from the settlement limit is that "The site lies in the open countryside detached from the existing settlement, in an unsustainable location and therefore not in accordance with the settlement strategy. Parts of the site contain areas of significant biodiversity value. I believe they have not been comprehensive in carrying out the Assessment of site N92/218483, due to the wording "immediately adjacent to a settlement limit". Therefore my site has not been fully assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regards to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because "The site lies in the open countryside detached from the existing settlement, in an unsustainable location" The Council are considering 300/400 houses just over 1 field away on a greenfield site - candidate site N35. I see no mention of countryside only greenfield, no mention of unsustainable location and biodiversity value. Surely part brownfield sites should be considered first as opposed to building on higher grade land in the open countryside. This would allow for a full assessment to be made on Candidate site N92, for a few sustainable houses to code 5/6 of the code for sustainable homes with onsite renewable energy savings on a part brownfield site.</p> <p>The Council only seem to be interested in large sites for example, 300/400 houses just only 1-2 fields away to site N92. My proposed site will be more beneficial to sustainability, climate change and biodiversity improvements than any one of these proposed houses.</p> <p>I believe the allocation of sites is not transparent and delivered in accordance of the Delivery Agreement. Site allocations should not incline to be for large housing estates.</p> <p>Having a mixture of housing on a new estate is ok, but there is also a need for individually designed homes such as this site could give to the self builder, they may want to create something tailored to their family's unique requirements; or something architecturally appealing, or because they want to live in a home that they might not be able to afford on the open market. For many, self build is a chance to create the life they have always dreamed of.</p> <p>Why Candidate site N92/218483 (Residential)</p> <p>To build a few sustainable houses which will be built to code 5-6 of the code for sustainable homes. Having architectural merit and being aesthetically sympathetic to the surrounding environment.</p> <p>Brownfield Candidate site N92 is bordering Quarry Road, a site of approximately 4.5 acres (1.8ha) of poor quality land, a brownfield site formerly a Draft Mine with associated waste to the elevated side of the sites, this mine has its entrance near the boundary of the fencing on the east side and tunnels in the direction of Danalan farm. The mound to the east can be seen to be coal waste with some builder's rubble. Some trees as can be seen on the mound have not rooted firmly into the waste. There is a small but constant flow of water at the south side from the drift mine-sealed entrance.</p> <p>Sustainable Sustainable development is the core principle underpinning planning. At the heart of Sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations.</p> <p>It is not my intension and never has been to build a concrete jungle or 150 houses as some Tonna residents have stated and been led to believe. The houses could be built into the side of the mound as not to be on the sky line or even close to the trees on the boarder to help</p>

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							<p>make the house blend in to the environment. Hence the house would be set into the natural folds of the landscape, with the back drop of the mound behind.</p> <p>These houses would have the ground area to incorporate energy and savings in the form of: Solar rood panels, Ground source heat pumps, Onsite spring water, Rain water harvesting, all of which are possible due to the terrain. Sewage treatment plant is also possible but can be connected to the main at Quarry Road/Henfaes Terrace or towards Mount Pleasant. The house nearest the south border could make use of hydro - water generating electricity, whilst the house nearest to the north could take advantage of small wind turbines on the top of the rise.</p> <p>Location of the site allows for good orientation of the dwellings, to make controlled use of solar gain. Large gardens for growing fruit and vegetables, and to accommodate buried rain water tanks, and to make good use of the flowing water at the south side boundary. The site is not liable to flooding.</p> <p>The two established means of access to this site is either from Quarry Road or Mount Pleasant which have been in existence for many years, would be improved and maintained. The hedge over hanging Quarry Road would be trimmed back, and the road surface improved on both accesses.</p> <p>Using these accesses more frequently would provide better security to the surrounding houses and rugby club, also provide for better foot path surveillance on Quarry Road.</p> <p>The site can barely be seen from the local houses or RFC Clubhouse due to the tree's screening these buildings. In fact the site would be difficult to see from most directions other than a few using Quarry Road.</p> <p>The existing community has all the normal facilities including schools, churches, shops, Post Office, pubs and community centre. The bus stops are some 400metres away at Henfaes Road (B4434) and the local schools 325 metres - School Road. There would be no need to provide new facilities.</p> <p>Allocation of this under used lower grade land should be used as opposed to meeting demand by development of higher grade land in the open countryside this would increase the range of sustainable areas in which people would like to live. Houses built in this area would not be on the sky line.</p> <p>A completed development would not impose unreasonable demands on local services. It will help to support local shops, schools, Pubs, churches etc.,</p> <p>To develop the site would make a small but significant contribution to climate change, as the location allows for rainwater harvesting, foul sewage treatment plants, ground source heat pumps, solar panels, and photovoltaic cells etc, even small scale wind turbine systems, could be placed upon the mound/mountain, with an input output electrical meter instead of the normal electrical meter, placed in one house. One house could benefit from the flow of water on the north boundary. These houses will be built to code 5-6of the code for Sustainable Homes with onsite energy savings to aid against climate change.</p> <p>If a foul sewage treatment plant in not acceptable to the Council a connection to the main could be made on Quarry Road or the road off Mount Pleasant leading to Quarry Road in my ownership.</p> <p>Occupation of this area would deter people from abusing the surrounding area plus it would help to reduce crime, vandalism, malicious fires, and illegal fly tipping. It would have the effect of policing the maintenance of the surrounding countryside and would provide for footpath surveillance, which would result in a safer environment for the public. It would also deter off road riding/driving of motor cycles and four wheel drive 'jeep type' vehicles, shooting of air rifles and youths damaging trees and undermining the roots making them unsafe.</p> <p>I believe that the 2 Rugby/football fields and surrounding wooded area are not owned by the school but by Council and leased to Tonna Rugby Club, with a blanket tree preservation order in place. Therefore candidate site N92 is defensible in regards to an extended settlement boundary, as it is confined within the site boundary fencing and into the mound. Please see suggested new settlement boundary Plan 1, the registered site plan N92/218483.</p>

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							<p>Finally I respectfully request that the inspector take all the information into account and conclude that there are convincing and compelling arguments for a development to be sited in this candidate site N92/218483.</p> <p>So as not to duplicate paper work, if the building of a few houses is found to be unacceptable on this site N92/218483, would you consider the same site N93/218483 for horse related facilities? Well-kept horses and ponies, in a managed landscape can have a positive effect on the countryside. A little effort made when designing new stabling can lead to a big positive impact on the local landscape, as well as to the health of the horse's or pony's. Suggested- stables to accommodate 3 or 4 horses.</p>
Dep462	Messrs DGH & IDJ Jones		457702	Object	Housing Sites	Policy H 1	<p>Land at Main Road, Cilfrew, Neath</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.55 hectares, set immediately to the rear of established residential houses at Main Road, Cilfrew.</p> <p>We seek that an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cilfrew is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • the potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Cilfrew will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cilfrew, without any demonstrable harm to the mid-hillside landscape, by utilising mature and defensive natural and man-made boundaries to distinguish it from surrounding countryside. The site lies directly adjoining the rear perimeters of houses fronting the eastern flank of Main Road, and capable of direct access off that highway via an improved access with the former Cilfrew Hotel. Alternatively, the Objectors own property at Main Road which could be demolished to make way for a new access road to facilitate development. The land falls to New Road to the east, which itself is noted for a linear frontage of residential properties. The Objection site will therefore occupy a modest area of land between the above highways, and as such consolidate the built form of Cilfrew. 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school, secondary school and local shops at Cadoxton. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified. 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses.

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							<p>5. Aid to foster the sense of a Neath suburb identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Small Local Centre" status within the LDP.</p> <p>The site should be considered in the context of Planning Permission under P2004/0370 in February 2005, which was granted on appeal to the Assembly Ministers. The site, nor its immediate surroundings, has not undergone any material physical changes since that decision. It was agreed at that time that the site formed a logical rounding off between Main Road and New Road.</p> <p>The minor addition will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some six additional units will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep465	Messrs DGH & IDJ Jones		457702	Object	Housing Sites	Policy H 1	<p>Land at New Road, Cilfrew, Neath</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.54 hectares, set immediately adjoining and opposite established residential houses at New Road, Cilfrew.</p> <p>We seek that an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cilfrew is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • the potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Cilfrew will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cilfrew, without any demonstrable harm to the mid-hillside landscape, by utilising mature and defensive natural and man-made boundaries to distinguish it from surrounding countryside. The site lies directly adjoining and directly opposite a continuous frontage of houses fronting New Road, and capable of direct access off that highway via an improved carriageway, with could accommodate traffic calming and provision of a public footway. The land at New Road would replicate a linear frontage of residential properties respecting the character and setting of the north-western side of that highway. The Objection site will therefore consolidate the built form of Cilfrew. 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school, secondary school and local shops at Cadoxton. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified.

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							<p>4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses.</p> <p>5. Aid to foster the sense of a Neath suburb identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Small Local Centre" status within the LDP.</p> <p>The site should be considered as a minor addition, which will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some six additional units will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep492	Mr Eric Lewis		324744	Object	Housing Sites	Policy H 1	<p>Land adjoining Brynna Road, Cwmafan</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 3.0 hectares, set immediately to the rear of established residential houses at Brynna Road, Cwmafan.</p> <p>We seek that the land be allocated as a Housing Site, under Policy H1, and an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cwmafan is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • the potential to reduce carbon emissions through co-location with other uses. <p>This Objection form is supplemented by a Planning Statement and Phase 1 Ecology Report, which address the site's compatibility with each of the above criteria. In short, the site at Cwmafan will.</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cwmafan, without any demonstrable harm to the mid-hillside landscape, by utilising mature and defensive natural boundaries to distinguish it from surrounding countryside. 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school, local shops and village facilities. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified from a recent comprehensive Phase 1 Survey undertaken of the site's flora and fauna. 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses. 5. Aid to foster the sense of Afan Valley identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities

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							<p>of the "Large Local Centre" status within the LDP.</p> <p>The site should contribute to the allocation of housing under Policy H1 for the above reasons, being credible, robust and meeting the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some 60 units will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep493	Mr Robert Maggs		196308	Object	Housing Sites	Policy H 1	<p>Tir Bach Washery Site, Tirbach Road, Ystalyfera (Site 1)</p> <p>I consider the deposit plan to be unsound with respect to coherence and Effectiveness Tests - in particular test CE2.</p> <p>I consider the plan not flexible enough to sustain the needs of the local people of Ystalyfera. Currently people have to move out of the village when moving up to larger homes. The neighbouring village of Ystradgynlais has a much higher number of high quality family homes that are always in demand.</p> <p>The plan doesn't seem to recognise a need for aspirational housing and the fact that people may wish to stay where they are and not leave their immediate families and friends.</p> <p>Section 2 'Strategy' point OB6 states as part : 'Reinvigorate the valley areas...' This reinvigoration seems to stop at Pontardawe which is identified as 'an area of strategic growth' so in effect there is no reinvigoration any further up the valley than Pontardawe. Anyone wishing to improve their (and their families) lifestyle or wishing to upgrade to a larger property is forced by the plan to move down the valley at least as far as Pontardawe or to move down to the coastal corridor where most of the focus of the plan seems to be.</p> <p>I therefore feel the plan does not reflect the reality of the situation in the upper Swansea valley. The plan in its current form will exacerbate the problem of people having to leave the upper Swansea valley area and positively discourages any person who may wish to move there. Therefore the plan fails in its stated objective of the re-invigoration of the upper Swansea valley.</p> <p>The new trunk road (A4067) from junction 45 of the M4 all of the way up the valley which the Ystalyfera bypass is part of, cost a huge amount of tax-payers money. What was all of this money spent for if not to support developments of this kind and encourage people to move up the valley and not away from it?</p> <p>Two of the big retail chains (Tesco and Asda) have recently opened new large supermarkets in Ystalyfera, these along with the existing village retail outlets provide ample retail facilities for any new development.</p> <p>A recent site meeting with NPT highways manager found that the site is easily integrated into the village of Ystalyfera by the installation of two new pedestrian access points and that the local road network has more than sufficient capacity. A review of the site access road onto the A4067 by a local engineering company showed that the A4067 can be easily adapted to the sites needs.</p> <p>There are a lot of anti-social activities taking place affecting the northern perimeter and upper area of the site. A large amount of fly tipping takes place and the upper half of the site is used by a off-road motor bikes at the weekend which causes a lot of environmental damage and presents a hazard to members of the community using a public right of way which crosses the site. An extension of the current residential boundary (which stops at the site gate) and a future development would help halt these anti social activities by bringing the area into use.</p> <p>The site is brownfield - an old coal washery - and is in a derelict state. The only chance to reclaim this site will be by a development of this kind otherwise the site will continue to be a potential source of pollution - fly tipping etc and remain an eyesore.</p> <p>Another option is to 'phase' the process - move the residential boundary to initially only encompass the lower site area - then pursue by the council monitoring process for any further extension of the development. Whilst this is a valid approach it would not address the anti-social activities that take place across the Northern edge of the site, also any future development of the higher area would require the use of large earth moving machines and may be overly intrusive to existing dwellings already on the lower site area. A development of a site of this size would anyway be inevitably phased as part of the building / marketing process.</p> <p>Finally the site has a long elevated river frontage which is very rare for a new housing development in the UK, so when taking into account the demand for the higher quality houses in the neighbouring village of Ystradgynlais, a high demand for a development of aspirational</p>

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							homes incorporation riverside apartments is anticipated, this would also change the entire dynamic of Ystalyfera and truly re-invigorate the upper Swansea valley area an objective which the LDP aims for but fails to do.
Dep495	Mr Robert Maggs		196308	Object	Housing Sites	Policy H 1	<p>Tir Bach Washery Site, Tirbach Road, Ystalyfera (Site 2)</p> <p>I consider the deposit plan to be unsound with respect to coherence and Effectiveness Tests - in particular test CE2.</p> <p>I consider the plan not flexible enough to sustain the needs of the local people of Ystalyfera. Currently people have to move out of the village when moving up to larger homes. The neighbouring village of Ystradgynlais has a much higher number of high quality family homes that are always in demand.</p> <p>The plan doesn't seem to recognise a need for aspirational housing and the fact that people may wish to stay where they are and not leave their immediate families and friends.</p> <p>Section 2 'Strategy' point OB6 states as part : 'Reinvigorate the valley areas...' This reinvigoration seems to stop at Pontardawe which is identified as 'an area of strategic growth' so in effect there is no reinvigoration any further up the valley than Pontardawe. Anyone wishing to improve their (and their families) lifestyle or wishing to upgrade to a larger property is forced by the plan to move down the valley at least as far as Pontardawe or to move down to the coastal corridor where most of the focus of the plan seems to be.</p> <p>I therefore feel the plan does not reflect the reality of the situation in the upper Swansea valley. The plan in its current form will exacerbate the problem of people having to leave the upper Swansea valley area and positively discourages any person who may wish to move there. Therefore the plan fails in its stated objective of the re-invigoration of the upper Swansea valley.</p> <p>The new trunk road (A4067) from junction 45 of the M4 all of the way up the valley which the Ystalyfera bypass is part of, cost a huge amount of tax-payers money. What was all of this money spent for if not to support developments of this kind and encourage people to move up the valley and not away from it?</p> <p>Two of the big retail chains (Tesco and Asda) have recently opened new large supermarkets in Ystalyfera, these along with the existing village retail outlets provide ample retail facilities for any new development.</p> <p>A recent site meeting with NPT highways manager found that the site is easily integrated into the village of Ystalyfera by the installation of two new pedestrian access points and that the local road network has more than sufficient capacity. A review of the site access road onto the A4067 by a local engineering company showed that the A4067 can be easily adapted to the sites needs (see attached sketches).</p> <p>Candidate site SV7 - 2nd Submission proposing a 'phased' development.</p> <p>There are a lot of anti-social activities taking place affecting the northern perimeter and upper area of the site. A large amount of fly tipping takes place and the upper half of the site is used by a off-road motor bikes at the weekend which causes a lot of environmental damage and presents a hazard to members of the community using a public right of way which crosses the site. An extension of the current residential boundary (which stops at the site gate) and a future development would help halt these anti social activities by bringing the area into use.</p> <p>The site is brownfield - an old coal washery - and is in a derelict state. The only chance to reclaim this site will be by a development of this kind otherwise the site will continue to be a potential source of pollution - fly tipping etc and remain an eyesore.</p> <p>Finally the site has a long elevated river frontage which is very rare for a new housing development in the UK, so when taking into account the demand for the higher quality houses in the neighbouring village of Ystradgynlais, a high demand for a development of aspirational homes incorporation riverside apartments is anticipated, this would also change the entire dynamic of Ystalyfera and truly re-invigorate the upper Swansea valley area an objective which the LDP aims for but fails to do.</p> <p>Note- This is a second submission for this site, The difference between this and the first is this submission for an additional/new site to be</p>

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							<p>added to the plan 'phases' the development i.e. move the residential boundary to initially only encompass the lower site area - then pursue by the council monitoring process for any further extension of the development.</p> <p>Whilst this is a valid approach it would not address the anti-social activities that take place across the Northern edge of the site, also any future development of the higher area would require the use of large earth moving machines and may be overly intrusive to existing dwellings already on the lower site area.</p> <p>Other than this phasing the submissions are almost identical.</p> <p>A phased approach will bring additional challenges - Future earthworks required on upper area, Possibly not solving the anti-social activities along the Northern perimeter of the site as this area would still not be 'used', Future integration of additional roads etc, etc, Whilst all of the challenges can be overcome the preferred option is to move the boundary around the whole site in one go as reflected in the 1st submission.</p>
Dep496	Mr John Doran		286649	Object	Housing Sites	Policy H 1	<p>Land South of the A4067, Godre'r Graig</p> <p>We are of the opinion that the site was not given fair consideration during the consultation and appraisal periods. By this we believe it has led to the comments contained within the commentary section and the decision made being flawed at the best or totally inaccurate at the worst. When three site on the opposite side of the A4067 have been granted planning and or completed although they were not within designated development areas prior to the new LDP. This is how we read the comments contained within the proposed LDP referring to the two Taylor Wimpy and Barrett's sites in the settlement of Godre'r Graig within the Swansea Valley Spatial Area.</p>
Dep503	Mr & Mrs A Golding		196295	Object	Housing Sites	Policy H 1	<p>Ty Du Farm, Clyne</p> <p>The Plan is unsound, flawed and not flexible enough - it states in many places that it supports all valley communities (see references below) - we hear what The Plan is saying in writing but do not see it on the ground. The Plan needs to be amended to include development of the 'settlement hierarchy' villages to support and reinvigorate village communities.</p> <p>It does not encourage enough growth in the Valleys, does not recognise that smaller villages have communities nor have a policy that reinvigorates the smaller village communities in particularly in the Neath Valley.</p> <p>This is shown in it's Settlement Strategy - 'settlement hierarchy' discounts villages as having 'limited infill opportunities only' even though a development could be considered that would use and support the sustainability of the 'hubs' - only 4 residential developments have been approved in the Neath Valley and all of these are in the Glynneath 'hub' (P41 5.1.10 see attached No.1) and of these - 3 were already in the UDP.</p> <p>The 'infill only' policy implemented in the UDP resulted in only individually built executive homes being built along the Neath Valley corridor from Resolven to Clyne following the UDP. By discounting villages in the 'settlement hierarchy' it does not plan for their recovery.</p> <p>Over the past 10yrs or so many smaller villages have lost services such as local shop, post office, school etc. If there was a policy within The Plan that would allow for these smaller villages to be developed it would enable the community to retain it's current services and THRIVE and not just struggle to SURVIVE over the next 10yrs.</p> <p>Many of the main services for villages would continue to support these 'hubs' and their regeneration. Other services within the Borough are being centralised - a 'Super School' is being built in Port Talbot that will close 3 comprehensive schools in the area. In the Neath Valley a new Super Medical Centre is proposed for Glynneath that will service communities down to the village of Clyne (my village) that is only 6.7mls away and on a direct bus route.</p> <p>We can understand that centralisation is necessary for a number of reasons but cannot accept centralisation of population - villages do not have to be 'sustainable' to be developed in a generation of centralisation. Without regeneration villages will no doubt be downgraded to 'dormitory' in a subsequent plan - will lose it's community and face the danger of become family free.</p>

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							<p>For example: The Village of Clyne.</p> <p>Clyne has already lost it's local shop and post office but still has a primary school with 58 pupils that has capacity for 120 pupils.</p> <ul style="list-style-type: none"> The village of Clyne lies on a distinct corridor stretching from the main centres of Glynneath, Resolven and Neath. It actually creates a continuous line of communities in this corridor and any development there would mean an added population focused in using the intended new regeneration of Neath town centre & the Neath Valley hubs This corridor has an established public transport link with transport running at 30mins intervals and currently servicing Clyne This corridor runs parallel to the A465 highway which offers only the option to travel by car. By contrast, in addition to being on a bus route, it is even possible to walk or cycle from Clyne to Neath along the regenerated Neath canal, a journey which is very 'green' by definition and provides interesting information about flora, fauna and wildlife on notices which have been erected by Neath Council. Development offers an opportunity to improve - through extra facilities/commuted sum - the existing community of Clyne through planning gain. Clyne is attractive and would give choice to families who would prefer to live in semi rural areas with easy access to urban facilities. <p>We have re-submitted our site for the reasons we have given above that the LDP Plan is flawed and not flexible enough in it's Settlement Strategy</p> <ul style="list-style-type: none"> Our site could, in part, resolve the perceived flaws in The Plan for the Neath Valley set out in Appendix 1 The site has not been used for agricultural purposes since 1994. Our site whilst detached from an existing settlement, is in very close proximity lying alongside & behind the settlement. There would be no coalescence of the settlement. In regard to access to the site, other than a reduced speed limit of 20mph being put into place in 2013, nothing has changed since 2006 when Highways indicated by letter that an acceptable access can be formed A well known and established local building company has shown high interest in our site. BIODIVERSITY- we are mindful of offsetting biodiversity. No intention to obliterate the site and any unavoidable interference will be offset with the site being affordably and respectfully developed. <p>References</p> <p>Page 13 2.1 Vision 2.1.3, 'The future role for more rural parts of the County Borough is outlines, together with the way that the economy and communities of the Valleys will be supported and enhanced'.</p> <p>Page 16 2.3 Development Strategy 2.3.6. 'All communities within Neath Port Talbot can help to achieve the aims of the Plan and therefore the strategy recognises all communities and their function within the County Borough'. 2.3.11 The Development Strategy aims to: Facilities growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities 2.3.12 This means: Providing a flexible approach to development within the Valley communities. (<i>One of the bullet points</i>)</p> <p>Page 18 2.5 Spatial Strategy 2.5.7 'whilst recognising the key function Valley communities have and reinvigorating these areas to make them more resilient'.</p> <p>Page 21 Growth Areas 2.5.37 These two growth areas (Pontardawe & the Upper Neath Valley) are supported and supplemented by other settlements within the settlement hierarchy. Whilst the majority of large housing allocations are focused around growth points, in remaining areas, growth will be</p>

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							delivered on smaller sites within the identified settlement limits. Page 22 A Flexible Approach to Development 2.5.50 Due to their topography and distance from the main centres of population the Valley communities have suffered from decline and a lack of investment. There are communities that are vulnerable to further economic decline, deprivation and out migration. The LDP therefore seeks to encourage a more flexible approach to development in the Valleys in order to build sustainable, resilient communities with an aim to halt the process of depopulation and decline.
Dep504	Mr Gary Pugh		322271	Object	Housing Sites	Policy H 1	<p>Land to the north of Pen y Bryn, Cwmllynfell</p> <ul style="list-style-type: none"> I believe that the LDP is unsound in that all the references to reinvigoration and revitalisation do not appear in the plan. Paragraph 5.1.8 and table 5.3 show 4.3% of growth and land provision in the Swansea Valley but the majority will be delivered at the Dewhirst site at Ystalyfera. Only 25 and 75 units are to be built / windfall across the whole of the Swansea Valley. Paragraph 1.2.16 Vibrant and Viable Places - "Everybody in Wales should live in well connected, vibrant, viable and sustainable communities with a strong local economy and quality of life" - new housing delivers this. Paragraph 1.2.39 outcome 3 of SIP- "meeting housing needs across all tenures". The LDP fails this as Table 5.3 shows. Paragraph 1.2.48 states that the Local Housing Strategy should include housing for all sections of the community. With little housing supply, this is going to be difficult if not impossible to achieve. Paragraph 2.1.1 states that "community cohesion will be promoted by concentrating development in key areas to provide benefits". This does not appear to be the case. Paragraph 2.5.50 states that the LDP seeks to encourage a more flexible approach to development". It does not:- <ol style="list-style-type: none"> No developments over 10 units. All settlements have a very tight settlement limit drawn allowing for little or no further housing development. Paragraph 3.0.10, table 3.1 - as a small local centre, Cwmllynfell should have more housing allocated in order that the services are supported and maintained and not left to fail. Paragraph 4.0.25 SP6(g) - Protecting cultural identity. By not allowing development in the Swansea Valley beyond the development of Dewhirst, the cultural identity will erode. Paragraph 5.1.8 - There is little new housing and little employment and these add up to reinvigoration? They do not. The inclusion of Phase 1 will go some way to promoting the recovery that is needed in the valleys.
Dep533	Mr V Price		196316	Object	Housing Sites	Policy H 1	<p>Land South of Bay View, Port Talbot</p> <p>Essentially we submit that the settlement boundary for Port Talbot should be extended to include land south of Bay View and north of the Ynys y Gored housing development.</p> <p>The land in question is presently shown outside of the settlement in the Deposit LDP. It is submitted that a small development here would contribute to the housing supply and would be viewed in the context of the surrounding settlement to both the north and south.</p>
Dep540	Mr V Price		196316	Object	Housing Sites	Policy H 1	<p>Land at Broomhill, Port Talbot</p> <p>Essentially we submit that the settlement boundary for Port Talbot should be extended to include land at Broomhill.</p> <p>The land in question is presently shown as open countryside in the Deposit LDP. It is submitted that a small development of three dwellings here would contribute to the housing supply and would be viewed in the context of the surrounding settlement to both the north and south.</p>
Dep541	Mr M Evans		797794	Object	Housing Sites	Policy H 1	<p>Land adjacent to and to the rear of 10 Clyngwyn Road, Ystalyfera (Site 1)</p>

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							<p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the proposed site being within the settlement limits of Ystalyfera within the Local Development Plan.</p> <p>The site is located at the north eastern end of Clyngwyn Road with links to all the facilities this area has to offer.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped. His site represents a possible windfall site but for it to be successfully considered it must be located within the Settlement Limits of Ystalyfera.</p> <p>Justification for Inclusion as an Alternative Site.</p> <p>The Local Planning Authority has set out criteria whereby sites capable of development for residential purposes may be considered and have indicated that preference to such allocations will require the site to be contained within Settlement Limits and also should be on previously used land.</p> <p>Paragraph 9.3.14 states that there is not the expectation that all sites identified for housing development in the plan will deliver new housing in the future. There remains the possibility, however, that a number of the sites will be implemented and this category of development site therefore represents a significant potential source for new housing. It is considered that this is one such site.</p> <p>Paragraph 9.5.2 (page 102) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Whilst the site subject of this application was not submitted as a candidate site for inclusion within the Settlement Limits of Ystalyfera at the commencement of the LDP process, it nevertheless is a brownfield site. There is only one major housing site proposal allocated for Ystalyfera with the remainder of development being taken up with windfall sites within the settlement limits. The inclusion of this site within the Settlement Limits would help to satisfy this aim.</p> <p>The inclusion of the site within Settlement Limits will also result in the removal of a waste tip from a former clay pit which confirms its brown field status.</p> <p>Turning now to the provision of Affordable Housing within the Draft LDP, the Council has considered the contents of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 7.47 on page 89 at Fig. 80 shows the number of houses required in the period 2011 - 2026, namely Market Housing - 4900 and Affordable Housing - 3100.</p> <p>Paragraph 7.54 indicates there is a requirement for Affordable housing across all areas of Neath Port Talbot, and given the strategic requirement identified it will be important to maximise Affordable Housing delivery wherever possible. Nevertheless. the Council will need to consider the appropriate strategy for the future housing mix in each area based on individual area profiles provided.</p>

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							<p>The Draft LDP lists targets for the provision of Affordable Housing and it is the Authority's aim to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas.</p> <p>The LPA has indicated its preferred Settlement Limits for Ystalyfera in the Draft LDP, and has excluded this site and as a consequence restricting the number of opportunities to:</p> <ul style="list-style-type: none"> • Allow for controlled expansion of the village and • Allow for a percentage of Affordable Homes to be constructed to meet local demand. <p>The consequence of including this site within the settlement means that it would provide a percentage of Affordable Housing that would go some way to reducing the acknowledged shortfall of approximately 600 Affordable Home units identified by the Authority in Paragraphs 4.0.41 and 6.0.4 of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 6.0.5 of the same document states that the need for affordable housing remains a key issue for the Deposit Plan. This strategy is reinforced by paragraph 7.0.5 which seeks to provide additional affordable housing units throughout the County Borough and ensure new housing development makes a fair and justified contribution towards the provision of affordable housing.</p> <p>Although the Council has reduced the number of Affordable Homes required over the plan period from 3100 to 2500 (i.e. the 600 shortfall) it acknowledges that the Local Housing Market Assessment 2012 (see above) has identified the need for 3100 affordable units over the LDP period. Paragraph 9.0.6 states that the planning system will not be able to meet the entire need (of affordable housing) over the plan period.</p> <p>Conclusion</p> <p>The proposed development if included within the Settlement Limits allows for the managed expansion of the settlement of Ystalyfera in a sustainable location with good access to areas within the Swansea valley and the more local facilities and services on offer in Ystalyfera.</p> <p>Development of the site would help support the facilities and services in Ystalyfera and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth Area' of Ystalyfera.</p> <p>The Local Planning Authority's considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims and would also provide for Affordable Housing that would go some way to reduce the identified shortfall of such units within the County Borough area over the plan period.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Ystalyfera.</p>
Dep544	Messrs Eric Patterson & Vic Price		786506	Object	Housing Sites	Policy H 1	<p>Land at Penhyddwaelod, Bryn</p> <p>The proposals at Penhyddwaelod, including land west of Bryn, are for a large extension to the settlement, mostly to provide housing but also a range of other facilities and uses would be logical and beneficial to Bryn. As shown in Appendix 1 to our submission, there is interest from a local developer who is very interested in the site. In summary, our representations show that this site would be a more sustainable and beneficial allocation than either Western Logs or Hawthorn Close at Cwmafan. We also advocate the deletion of the housing allocation at Blaenbaglan School on the grounds of flood risk.</p> <p>Although we have not assessed the housing numbers that the LPA have calculated to represent the requirement for the LDP period, if the Inspector finds a shortfall (as is possible given the deviation from the Welsh Government projections), we invite consideration of the land at Bryn as a potentially high- quality, innovative and sustainable development that can help meet any identified shortfall.</p> <p>Nonetheless, we submit that in order for the LDP to be found sound, sites that best meet the correct strategy, that are implementable and that</p>

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							represent the most credible and alternative allocations having regard to the evidence base in its entirety, should be included - and that upon examining the evidence, the conclusion is that land at Bryn should be allocated for housing and potentially ancillary uses.
Dep557	Mr M Evans		797794	Object	Housing Sites	Policy H 1	<p>Land adjacent to and to the rear of 10 Clyngwyn Road, Ystalyfera (Site 2)</p> <p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the site proposed as being within the settlement limits of Ystalyfera within the Local Development Plan.</p> <p>The site is located at the north eastern end of Clyngwyn Road with links to all the facilities this area has to offer.</p> <p>The site now proposed as an Alternative Site was previously referenced as Swansea Valley SV5 - Garden of 10 Clyngwyn Road, Ystalyfera and was excluded from the Housing Sites allocation at Stage 3 of the Candidate Site Assessment Report (August 2013) - Page 101, for the following reason:-</p> <p>The spatial strategy focuses the majority of new housing, delivered through large site allocations, on the coastal corridor along with Pontardawe and Glynneath as growth points in the valleys. The remaining valley areas of the Amman, Afan, Swansea and Dulais will not have large site allocations and will support more limited growth in line with the Settlement Strategy. Part of the site contains an area of significant biodiversity value.</p> <p>Decision: The inclusion of such a large site in the valleys is not supported as it is out of accord with the spatial strategy.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped. His site represents a possible windfall site but for it to be successfully considered it must be located within the Settlement Limits of Ystalyfera.</p> <p>Justification for Inclusion as an Alternative Site.</p> <p>The Local Planning Authority has set out criteria whereby sites capable of development for residential purposes may be considered and have indicated that preference to such allocations will require the site to be contained within Settlement Limits and also should be on previously used land.</p> <p>Paragraph 9.3.14 states that there is not the expectation that all sites identified for housing development in the plan will deliver new housing in the future. There remains the possibility, however, that a number of the sites will be implemented and this category of development site therefore represents a significant potential source for new housing. It is considered that this is one such site.</p> <p>Paragraph 9.5.2 (page 102) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Whilst the site subject of this application was originally dismissed as a Candidate Site (Site Ref SV5 refers) it nonetheless satisfies the criteria for the inclusion of such sites as defined by the Local planning Authority. The reason given for its exclusion has standard wording and is not site specific. It is considered that the Local Planning Authority had considered the inclusion of this site and it was only eliminated</p>

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							<p>from the Candidate Site list at stage 3 following consultation with various consultees but no specific reasons have been given for its exclusion.</p> <p>It is noticeable from the LDP Candidate Site Assessment Report that the LPA has included similar smaller sites of roughly the same area within the Housing Allocation in other communities in the plan area.</p> <p>The Residential Candidate Sites filtered out at Stage 3 were excluded on the basis that they did not accord with the Preferred Strategy considered by the Local Planning Authority. It is contended however, that the site does satisfy the criteria set out the table on page 9 of the LDP Candidate Site Assessment Report (August 2013) under the Strategy topic.</p> <p>There is only one major housing site proposal allocated for Ystalyfera - H1/29, with the remainder of development being taken up with windfall sites within the settlement limits, which are not identified. The inclusion of this site within the Housing allocation would help to satisfy the provision of windfall sites as considered by the Local Planning Authority.</p> <p>The inclusion of the site will also result in the removal of a waste tip from a former clay pit workings which confirms its brownfield status.</p> <p>The Strategic Housing Site Assessment Report (August 2013) indicates the total housing provision for the area (excluding Pontardawe) as being 392 dwellings.</p> <p>Regarding proposed housing site H1/29 that is allocated for residential development within the plan period, it is understood that there is a current planning application submitted for consideration by the Local Planning Authority. This equates to approximately 120 houses.</p> <p>If planning permission is approved there will be no immediate 5 year supply of land available for development in the Ystalyfera area.</p> <p>Regarding the areas defined as Landbank sites, these are solely located within the development at Godrergraig (site refs H1/LB/35, 36 & 37 refer). Development here is on-going so there should be a requirement to provide additional sites to ensure sufficient land is available for development within the plan period particularly as the total provision for the area, i.e. 392 dwellings, is being eroded .</p> <p>The inclusion of the site subject of this application should go some way to secure the requirement for additional housing over the plan period and to provide an immediate supply of available land for development within the 5 year period</p> <p>Turning now to the provision of Affordable Housing within the Draft LDP, the Council has considered the contents of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 7.47 on page 89 at Fig. 80 shows the number of houses required in the period 2011 - 2026, namely Market Housing - 4900 and Affordable Housing - 3100 (Excluding Landbank sites).</p> <p>Paragraph 7.54 indicates there is a requirement for Affordable housing across all areas of Neath Port Talbot, and given the strategic requirement identified it will be important to maximise Affordable Housing delivery wherever possible. Nevertheless. the Council will need to consider the appropriate strategy for the future housing mix in each area based on individual area profiles provided.</p> <p>The Draft LDP lists targets for the provision of Affordable Housing and it is the Authority's aim to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas.</p> <p>The LPA has indicated its preferred Settlement Limits for Ystalyfera in the Draft LDP, and has excluded this site and as a consequence restricting the number of opportunities to :-</p> <ul style="list-style-type: none"> • Allow for controlled expansion of the village and • Allow for a percentage of Affordable Homes to be constructed to meet local demand. <p>The consequence of including this site within the settlement means that it would provide a percentage of Affordable Housing or a</p>

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							<p>contribution to such provision elsewhere within the plan area that would go some way to reducing the acknowledged shortfall of approximately 600 Affordable Home units identified by the Authority in Paragraphs 4.0.41 and 6.0.4 of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 6.0.5 of the same document states that the need for affordable housing remains a key issue for the Deposit Plan. This strategy is reinforced by paragraph 7.0.5 which seeks to provide additional affordable housing units throughout the County Borough and ensure new housing development makes a fair and justified contribution towards the provision of affordable housing.</p> <p>Although the Council has reduced the number of Affordable Homes required over the plan period from 3100 to 2500 (i.e. the 600 shortfall) it acknowledges that the Local Housing Market Assessment 2012 (see above) has identified the need for 3100 affordable units over the LDP period. Paragraph 9.0.6 states that the planning system will not be able to meet the entire need (of affordable housing) over the plan period.</p> <p>Settlement Topic Paper (August 2013)</p> <p>9.0.3 With the exception of Dormitory settlements, all settlements have defined limits. Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>9.0.4 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy, but in areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy.</p> <p>In this instance part of Clyngwyn Road has been excluded from the Settlement Limit boundary in this part of Ystalyfera. However, historically, this part of Clyngwyn Road has been an established part of the settlement. The site has previously supported local industrial uses and more recently residential uses that once provided a sustainable source of economic activity and viability that supported the local population. The inclusion of this site will therefore reinforce the original settlement boundaries along Clyngwyn Road.</p> <p>Conclusion</p> <p>The proposed development if included as a housing site will allow for the managed expansion of the settlement of Ystalyfera in a sustainable location with good access to areas within the Swansea Valley and the more local facilities and services on offer in Ystalyfera.</p> <p>Development of the site would help support the facilities and services in Ystalyfera and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth Area' of Ystalyfera.</p> <p>The Local Planning Authority's considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims and would also provide for a percentage of Affordable Housing that would go some way to reduce the acknowledged identified shortfall of such units within the County Borough area over the plan period.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Ystalyfera.</p> <p>The only allocated site for Ystalyfera is H1/29 at the southern end of the town but development of this site may well commence within the next 5 years if planning permission is granted for the application currently under consideration.</p>
Dep629	Mr H M Parry & Mr M C		266933	Object	Housing Sites	Policy H 1	<p>Land fronting Bryn Llewellyn Road, Alltwen</p> <p>I act for the owners of a small parcel of land of approximately 0.6 hectares located on the western fringe of the village of Rhos that I submitted for consideration as a residential housing candidate site for inclusion in the Neath Port Talbot Development Plan. My proposal</p>

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	Thomas						<p>was considered but was not included in the plan. The site is identified as appraisal P4 in the plan and is shown verged pink on my attached plan LT1.</p> <p>Scope of Statement</p> <p>My brief was to examine and report on the Council's appraisal of the proposed site; to comment on and analyse any objections and explain why I consider the site should be included in the development plan.</p> <p>The Council's appraisal is totally adverse in essence and its objections relate primarily to the alleged intrusive nature of the proposal; alleged loss of "green wedge" and claim it would contribute to the coalescence of the communities of Rhos and Alltwen. The appraisal also alleges that the site would be unsupported by services and facilities, also that it contains "biodiversity of some value".</p> <p>I propose to address the several objections separately as follows: The "intrusive" and "green wedge" factor The distance between Rhos and Alltwen is over a quarter of a mile. This is a substantial green wedge, the effectiveness of which is greatly increased by the undulating ground and the row upon row of intervening hedges, fields and the many substantial hedgerow trees. The overall pattern of natural vegetation is so unlikely to alter in the future that any loss of screening may be discontinued.</p> <p>I present a General Area Plan showing coloured green, the profusion of trees, fields and hedges that separate the two communities of Rhos and Alltwen.</p> <p>The proposed site has an area of 0.6 hectares only and is bounded by very substantial trees and hedges all of which would be retained and incorporated into the proposed landscaping scheme.</p> <p>I present plan LT2 showing how the site may be developed and Plan LT3 showing how the dwellings may be accommodated into the contours of the site. My sections show that by simple "terracing" of the floor levels the dwellings will be virtually unseen from the fronting road.</p> <p>Thus the site could be developed in a sensitive and reasonably unobtrusive way that would have only a marginal effect on the policy of retaining open countryside.</p> <p>Defensible Boundary It must be accepted that in the progress of time some land on the periphery of villages will be required to meet the future housing demands which will put pressure on its visual boundaries.</p> <p>There is no clear defensive boundary to the village.</p> <p>What is presently accepted as a boundary that comprises a topography of trees, hedges and general vegetation which exists in the landscape. A boundary is difficult to identify with any precision.</p> <p>Services and Facilities The appraisal of the proposed site (P4) states that it would be unsupported by services and facilities. The fact is that the site is much supported by both services and facilities. Therefore some clarification on this point is required. Firstly, to understand the terms, I would suggest that a broad difference between services - as being those essential for the proper enjoyment of modern housing and facilities - as being those essential for the benefit of the community but their use is of choice of the individual. So to be clear on the matter I submit the following facts on each;</p> <p>Services Access Road</p>

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							<p>The proposed development has direct access to the fronting County Highway. My plan LT2 shows the site access to the highway that complies in all respects to highway planning requirements.</p> <p>Foul Sewer These are available for connection in the fronting highway and are of adequate diameter to receive further development.</p> <p>Surface Water Surface water sewer disposal is via an existing off site water course.</p> <p>Water A main water supply is available for connection in the access road and is of adequate bore and pressure to receive further development.</p> <p>Electricity Main electricity is available for connection in the access road.</p> <p>Telephone The telephone service is available in the access road.</p> <p>Facilities Public Transport The village is served by two bus routes of adequate frequency; one actually passes the site access point.</p> <p>Shops, Post Office Etc These domestic facilities are available central to the village.</p> <p>Recreational facilities Park and Play areas are provided central to the village.</p> <p>Clearly the proposed site is supported by services and facilities. The facilities provided are no more and no less in extent and quality than those available to the site now proposed by the Council for Rhos and accepted as fit in all respects for inclusion in the Neath Port Talbot Development Plan. (verged yellow on my General Area Plan)</p> <p>Pressure for further development</p> <p>History has shown that within any locality the progress of time and a steadily improving environment creates a trend for the general population to increase.</p> <p>The trend is inevitable and puts pressure on the local authority for further housing development.</p> <p>A proposal for new housing development in any area should not be refused out of anticipation of encouraging further development in that area. All proposals should be judged at the time that they are made and their success or failure must be decided on their necessity and planning merits at that time.</p> <p>Biodiversity The proposed site comprises a small are (0.6ha) of grassland located on the western fringe of Rhos. The soils are shallow, very stony and limited in use to permanent grassland. This is consistent with its low quality, being as grade 4/5 on the Agricultural Land Classification Map. The site is surrounded by trees and natural hedgerows often underlain by bracken and bramble and the vegetation is common to the district and reveals no rare or unusual species. I attach a letter from Messrs. Howell J Edwards BSc (Est. Man) FRICS FAAV who is a respected local Agricultural Surveyor who endorses my statement on this point.</p>

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							<p>Why I consider the site should be included in the Neath Port Talbot Development Plan.</p> <p>Safety of Schoolchildren. The village of Rhos is divided into two areas being North and South of the A474 that passes through the village and is the main road route between Pontardawe and Neath. Both areas are primarily residential though the southern area is very much the larger of the two. The Rhos County Primary School that serves the whole area is located in the southern area of the A474, the mini supermarket and post office are also in the southern area. The area of land presently allocated in the Neath port Talbot Development Plan for future residential development at Rhos is located in the northern area of the A474. The result of the areas being thus separated is that children living in the northern area will have to negotiate the hazard of the A474 at least twice a day to attend the school. The same hazard will apply to the residents of the northern area when visiting the shops. The hazard could be alleviated to some extent by the allocation of the proposed site as a supplement to the land presently allocated for housing in the development plan now in its consultation period. The road A474 is coloured brown on my General Area Plan.</p> <p>Loss of Agricultural Holding The site allocated for residential development in Rhos village comprises first class agricultural land and its development will result in the loss of a worthwhile Agricultural Holding. Whereas the proposed site is of grade 4/5 land and used for general grazing. Its loss to development would have no adverse effect on the agricultural amenity of the area.</p> <p>Shortfall of Housing Development Land I refer to the Neath Port Talbot LDP and to its tables reporting the extent of land allocated for residential development. From my understanding of the figures presented, it is apparent that the present allocation of such land will not meet the Welsh Government's requirements, and that the plan in its present form may well have a large shortfall of building plots. A fact that is apparently accepted by Neath Port Talbot Council.</p> <p>I assume the reason for the shortfall may be that the Council consider there is insufficient land available that conforms to the Welsh Governments particular requirements.</p> <p>In which case I respectfully ask for the alternative site I have proposed be reappraised and in the light of facts in my statement; that virtually dismiss the Council's objections; be included in the plan as an alternative and supplemented site for residential development.</p> <p>Conclusion The proposed site does not lie within an area which has been designated as either a national park or an area of outstanding natural beauty. Neither does it lie within a green belt or within an area which is recognised as being of special landscape value. No part of the site is included within a conservation area designated under the act.</p> <p>I have shown with the attached plans and sections that the site could be developed in a way that would not be an intrusion in the landscape, would not contribute, other than in the most minor way, to the coalescence of the two communities of Rhos and Alltwen nor would it lead to a loss of worthwhile agricultural land.</p> <p>Conversely, by careful siting; sensitive planting and conservation of adjoining hedgerows, the site could be efficiently developed in a sensitive, unobtrusive and acceptable manner.</p> <p>Recommendation I commend the site as a sustainable alternative and suitably supplemental land to that presently allocated for the Pontardawe area. I respectfully ask that it be included in the Neath Port Talbot Development Plan for residential development.</p>

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Dep654	Mr F J Yardley	West Midlands Development Partnership Ltd,	322589	Object	Housing Sites	Policy H 1	<p>Land at the Former Blaenant Colliery, Crynant</p> <p>The site comprises land immediately south of the Former Blaenant Colliery, Crynant (now known as the Cefn Coed Colliery Museum) measuring approximately 3.17 ha. (7.84 acres).</p> <p>The site is not currently identified for any specific allocation in the Deposit Draft LDP and in our view should be identified either as a stand-alone residential/live-work development site or as enabling development to support the regeneration/redevelopment of the existing museum.</p> <p>Redevelopment of the site is in accordance with some of the key issues which the LDP seeks to address, namely KI 9: Sufficient land needs to be provided over the LDP period to meet the requirements of businesses and KI 14: There are significant areas of brownfield (previously developed) land requiring remediation and regeneration.</p> <p>The redevelopment of the site would also accord with the LDP's vision: "The County Borough's rural areas and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising on existing successes ..."</p> <p>In support of this also are the LDP's over-arching objectives OB6: Reinvigorate the Valley areas and improve economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth; OB11: To promote and protect a diverse portfolio of employment land and employment opportunities to meet the needs of residents and businesses and stimulate economic growth; and OB14: Provide a holistic approach to tourism, development to capitalise on Neath Port Talbot's growing tourism industry, specifically growth in the Neath and Afan Valleys to support the local economy.</p> <p>In terms of the LDP's spatial strategy, the regeneration of the site would accord with paras. 2.5.33, 2.5.50-51 and 2.5.53 and whilst we acknowledge that the site is not within or immediately adjacent to a settlement boundary, the LDP espouses a "flexible" approach.</p> <p>In policy terms, the regeneration of the site is in accordance with policies SP2 - Health, SP6 - Development in the Valleys Strategy Area (specifically point 7), SP11 - Employment Growth and EC6 - Live/Work Units.</p> <p>As a site upon which residential use is proposed either singularly or in the form of a live-work development, we would argue that the site has immediate access to the settlement of Crynant via the disused railway which could be redeveloped to provide a footpath. In this respect we would argue that it could be made to be sustainable. Without some higher value form of development to support the investment which is necessary to regenerate it, the site is destined to remain derelict and disused.</p> <p>We believe that the best way forward would be to identify the site in the same policy context as the site at Glynneath which is covered by policy VRS1 Valleys Regeneration Scheme/TO3 Tourism Led Regeneration. The site could then be identified as a tourism-led regeneration scheme comprising a mix of residential and employment uses (either singularly or together) to support the redevelopment of the Cefn Coed Colliery Museum.</p>
Dep708	Mr Huw Jones		589035	Object	Housing Sites	Policy H 1	<p>Land to the East of Ynysymond Road, Alltwn</p> <p>We wish to see the site included within the settlement limits (Policy SC1 and Proposals Map) and subject to a housing land allocation under Policy H1.</p> <p>We wish to object to proposed new housing land allocation H1/25 which was deleted as a UDP allocation following adverse comments by the Inspector. Circumstances have not changed and the site does not have capacity to accommodate 50 dwellings. This has been substantiated by evidence submitted in the form of an updated Ecological Appraisal which disputes that the allocated site could accommodate 50 dwellings without major ecological impacts.</p> <p>We therefore consider that the scale of the allocation should be reduced to 25 and the numbers apportioned between that site and the site promoted. The Alternative site should therefore be allocated for 25 dwellings as per the site layout submitted which allows for the retention</p>

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							<p>of ecological sensitive areas.</p> <p>1. INTRODUCTION</p> <p>1.1 Asbri Planning Limited has been instructed to submit representations on the Neath Port Talbot Deposit Local Development Plan. This follows a previous candidate site request that land to the east of Ynys Y Mond Road, Alltwen, Pontardawe (Ref P46), be considered as a proposed housing land allocation, and our subsequent comments on the Preferred Strategy and Stakeholder consultation stages.</p> <p>1.2 Despite the site having been recommended by the previous Unitary Development Plan Inspector in her Report as a potential replacement for a deleted site to the west of Ynys Y Mond Road, it is disappointing to note that the site has not emerged as a favoured option. Indeed, in considering potential sites in Pontardawe, the previously rejected site (to the west of Ynys Y Mond Road - Ref H1/25) rather than the submission site, is now proposed to be allocated for 50 dwellings in the Deposit Plan.</p> <p>1.3 Comprehensive supporting evidence was submitted at both the Candidate Site and Preferred Strategy stages, which demonstrated that the site could be adequately accessed, together with Landscape and Ecology studies which sought to confirm that the site could be appropriately developed whilst addressing nature conservation and visual aspects. A Concept Layout was also submitted at the Stakeholder Deposit Stage which showed that a scheme for 25 dwellings could be accommodated which preserved those parts of the site which are most sensitive in ecology and landscape terms.</p> <p>1.4 Section 2 of this submission describes the site. Section 3 provides representations on the Plan Strategy; Section 3 discusses the Overarching, Area and Topic Based Policies; Section 5 provides a comparison with the site proposed to be allocated; Section 6 discusses the Sustainability Appraisal Self Assessment; and Conclusions are made in Section 7.</p> <p>2.0 SITE DESCRIPTION</p> <p>2.1 Location The site is located to the east of Ynys Y Mond Road, some 500 metres to the south west of the centre of Alltwen and approximately 1.5 kilometres south-east of the centre of Pontardawe.</p> <p>2.2 Site Description The site, with a gross area of approximately 3.87 hectares, comprises several field parcels which are in use as pasture land, on a moderate slope facing north-west. It is contained along the south-western boundary by a belt of mature trees and woodland. To the west it slopes down to properties along Ynys Y Mond Road, which forms a linear pattern of existing detached and semi-detached dwellings extending south west from the main settlement of Alt Wen.</p> <p>2.3 Directly to the north of the site, occupying a level area of land is a rugby club pavilion and adjacent pitch. Between the pavilion and properties along Ynys Y Mond Road is a slightly elevated 'plateau' area intended as a training pitch but now overgrown. Beyond this is the Nant Llechau stream which runs in an incised channel along the north of the rugby pitch.</p> <p>2.4 Access Access to the site can be achieved via the gap between properties along Ynys Y Mond Road, where agreement for widening has been provisionally agreed with adjacent residents, who in turn would benefit from improved rear access. Signed agreements to this effect were submitted to accompany the original candidate site request and continue to apply.</p> <p>3.0 REPRESENTATIONS ON THE PLAN STRATEGY</p> <p>3.1 Section 2 - The Strategy is supported, in particular the Area Based Objective OB6, i.e. 'Reinvigorate the Valley Areas and improve economic prospects recognising the role of Glynneath and Pontardawe in delivering sustainable growth.'</p> <p>3.2 Objective OB7, which seeks to 'Provide an adequate supply, mix type and tenure of housing within sustainable settlements to meet the</p>

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							<p>needs of the projected population' is also supported.</p> <p>3.3 The Development Strategy of the Plan identifies Pontardawe and the Upper Neath Valley as a Strategic Growth Area in the Valleys which will create a mechanism to co-ordinate investment and ensure that the benefits of growth and regeneration are shared more widely throughout the valley communities. This is also acknowledged and supported as it seeks to facilitate growth in the Pontardawe area.</p> <p>3.4 In the above context, Paragraph 2.5.3 identifies Pontardawe and Glynneath as the most sustainable settlements in the Valleys to focus development. Paragraph 2.5.38 confirms that the town of Pontardawe is the 3rd largest settlement in the County Borough and the largest settlement in the Valley areas. Paragraph 2.5.41 goes on to state that Pontardawe has the ability to accommodate demand for the additional elements of new housing development.</p> <p>3.5 Whilst the above elements of the Plan can be considered sound, the means by which these aims are intended to be achieved are disputed. We shall therefore see in our following comments on the Overarching, Area and Topic Based Policies</p> <p>4.0 REPRESENTATIONS ON OVERARCHING, AREA AND TOPIC BASED POLICIES</p> <p>4.1 Following our comments in the previous section we support the identification of Pontardawe as a Town in the classification of settlements as proposed for the Valley areas. In this respect we also support the identification of Alltwen as a 'Small Local Centre'.</p> <p>4.2 We object however, to the level of new development associated with the proposed allocation H1/25, as the site previously promoted, to the east of Ynysymond Road, Alltwen is not proposed as a housing land allocation. This is despite previous evidence submitted at the Candidate Site stage, the Pre Deposit, Preferred Strategy stage, and the Stakeholder Deposit Plan stage which demonstrated that the site could be delivered, with ecology, landscape and highway issues resolved. A draft layout for 25 dwellings was also submitted which showed how the development could be accommodated.</p> <p>4.3 It is surprising therefore that the site to the west of Ynysymond Road (H1/25) is proposed to be allocated for 50 dwellings given the previous Unitary Development Plan Inspector's recommendation that the site allocation, then H1/36, be deleted.</p> <p>4.4 The Inspector's comments as regards this site are outlined below. "The objection site extends southwards from the narrow, wooded valley of Nant y Llechau in a series of open fields, half-encircled to the west and south by Derwen Road and bordered on its eastern side, at a higher level, by residential properties fronting Ynysymond Road. The site, measuring approximately 4 hectares, is allocated for 40 dwellings. This represents a much lower density of development than the rate of 30 dwellings per hectare promoted by UDP Policy H2 would suggest. The landowners object that the allocation figure is too low. However, highway evidence suggests that only 25 dwellings could be satisfactorily accessed, and ecological evidence suggests that far fewer than this could be built without threatening the particular ecology of the area. A recently-constructed infill group of dwellings on the Ynysymond Road frontage has dealt with earlier drainage problems."</p> <p>4.5 The Inspector's Report went on to state that: "Within the Ynysymond Road frontage group, a gap has been left to allow for a 5.5m carriageway with a footway on either side. That potential access is adequate to serve no more than 25 dwellings. A secondary access to Derwen Road would be necessary to allow more than 25 dwellings on the allocation site. However, Derwen Road is a narrow lane and its junction with Ynysymond Road is inadequate in terms of visibility, gradient and alignment. At its northern end, the lane serves existing residential properties. These already exceed the number which the lane is adequate, according to current standards, to serve. If development were to bring more vehicular traffic onto the lane, pedestrian safety would be threatened. Moreover, to form an access onto Derwen Road, and to provide the necessary visibility, would cause severe disruption to the hedge banks. These are rich in species and as a habitat, and are of particular ecological value. They are classifiable as Ancient and Species-Rich Hedgerows under the UK (and NPT) Biodiversity Action Plans, and impose a strong constraint upon development. No scheme utilising Derwen Road would offer satisfactory access."</p> <p>4.6 The Inspector concluded that: "There is only a single field, at the southern apex of the site, which does not carry a strong ecological constraint. However, to develop this field in isolation would result in an awkward if not actually fragmented pattern of development. It would impose a concentration of development at the farthest point away from the village centre, and would insert a new 'leading edge' of</p>

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							<p>potential conflict both alongside the hedge bank and projecting on 2 fronts into those fields which constitute the valuable habitats. On balance, the objections against the allocation are supported."</p> <p>4.7 In terms of the site being promoted, however, she had the following comments to make: " The proposal would extend built development onto the north facing valley slope of Nant y Llechau, which currently serves as the settlement limit in this part of Alltwen. However, the site is not uncharacteristically or intrusively elevated, and its visual impact upon the Swansea Valley could be softened by landscaping."</p> <p>4.8 The UDP Inspector went on to report that: "The constraints of flooding, ecology, or separation of settlements to which other potential sites are subject to, do not apply to this site, and it merits further consideration. However, there is insufficient evidence to demonstrate that the 3.87 hectare site could be suitably accessed. Consequently the objection is not supported. However, in view of the recommendation of this Report on the Allocation Site H1/36 (Ynysymond Road) the Council may wish to consider the objection site further, in more detail, as a potential replacement."</p> <p>4.9 On that occasion, however, the Council took the view that with the release of windfall sites elsewhere in the Swansea Valley area, no "pressing need" existed to allocate the site.</p> <p>4.10 The Inspector's concern regarding access has, however been resolved from the drawings previously submitted and the agreement of residents either side of the proposed access road to release strips on land in exchange for rear access provision.</p> <p>4.11 In view of the above we do not object to the proposed new Housing Allocation H1/25 in principle, but we object to the number of dwellings proposed - 50 dwellings. This is on the basis that, for reasons discussed above, and in subsequent sections of this document, we dispute that the site could accommodate 50 dwellings without significant impacts on ecology.</p> <p>4.12 We also object to the non inclusion of the subject site despite the level of supporting information previously submitted, where my client has expended considerable resources on commissioning the various studies.</p> <p>4.13 On the site being promoted, we have already established that, in order to allow for the protection of the most ecologically sensitive parts of the site, a reduced scale scheme of 25 dwellings has been derived. As a potential compromise in view of the limited capacity of the allocated site, we propose that the Council could reduce the proposed allocation to 25 dwellings and the numbers apportioned between the two sites. This would achieve a more balanced form of development by limiting growth on either side of Ynysymond Road to 25 dwellings.</p> <p>5.0 COMPARISON WITH ALLOCATED SITE</p> <p>5.1 In view of concerns expressed regarding the proposed housing land allocation, H1/25, not only by the previous LDP Inspector, but also by the Council's own assessment of the site, an updated Ecological Appraisal of the site being promoted was commissioned, along with some desktop comparison with the site proposed to be allocated.</p> <p>5.2 The resulting Appraisal establishes beyond doubt that with proposed development confined to the area of semi-improved grassland, which has limited ecological value, together with the adoption of the recommended measures, the Capacity Layout as proposed would represent a viable, deliverable alternative site for residential development.</p> <p>5.3 The Appraisal goes on to conclude that the ecological constraints associated with the allocated site to the west (H1/25) are such that the development of the whole area to provide 50 residential units is unlikely to be achievable.</p> <p>5.4 The work confirms that the premise put forward in these representations, i.e. that a combination of the two sites, i.e. the proposed allocation, and the site being promoted, could, in combination, provide for the required housing land supply whilst adhering to environmental policies, including EN 7, in the Deposit Draft Local Development Plan.</p> <p>5.5 The Landscape and Visual Impact Assessment, carried out in 2009, was undertaken on the basis of the whole site being allocated. It concludes that the site is well related to the urban form of Alltwen and could strengthen the original nucleated character of the settlement.</p>

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							<p>The site is contained by a strong pattern of woodland and hedgerows from the main body of "green wedge" land to the south. For these reasons, we believe that this Site, with appropriate master planning, would be acceptable in landscape and visual terms for development.</p> <p>5.6 With parts of the site being kept free from development, the visual impact will be reduced further, and this is referred to in the Sustainability Appraisal discussed in the following section.</p> <p>6.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE</p> <p>6.1A Sustainability Appraisal of the site, using the Council's 'Traffic Light' methodology has been carried out. In particular, we compare the proposed 'Alternative Site' being promoted with the proposed allocation H1/25.</p> <p>6.2The site proposed to be allocated has only a single Green score (Positive), 9 Amber scores (Neutral), 2 Red (Negative) and 1 ? (Uncertain). The two red scores relate specifically to the biodiversity concerns.</p> <p>6.3 By contrast the reduction of the site area on the promoted site, combined with appropriate mitigation would have no impact on biodiversity and would have potential to improve connectivity etc. Therefore the negative scores on the allocated site would be positive scores on the alternative site.</p> <p>6.4 Unlike the allocated site there is no flood risk, the site is closer to facilities, and rear access would be provided to residents to achieve community benefits. The one positive score for the allocated sites relates to landscape impact. Whilst the alternative site lies at a higher level, a previous Landscape and Visual Assessment Report, established that visual impact would be low. The study was carried out at an earlier stage in the site promotion process when the whole of the site was proposed to be developed. Consequently we consider apposite score should be attributed n landscape grounds.</p> <p>6.5 By contrast with the allocated site, therefore, the alternative site promoted has 7 positive scores, 6 neutral and no negative scores. This illustrates the degree to which the site assessment process has unduly favoured the site now proposed for development. It also bears out the previous UDP Inspector's views.</p> <p>6.6 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>7.0 CONCLUSIONS</p> <p>7.1 This Submission has been prepared on behalf of the proposer who is promoting land for residential development on land to the east of Ynys Y Mond Road, Alltwen, Pontardawe.</p> <p>7.2 In the Deposit Plan, the site is not favoured for development which would meet the housing needs of the Pontardawe area in the emerging strategy. This is in spite of its positive consideration by the Inspector at the UDP Inquiry, and supporting evidence which has been submitted at the candidate site stage, and the 'Stakeholder' Deposit stage, which demonstrated how landscape, ecology, access and layout issues could be addressed.</p> <p>7.3 Consequently we wish to object to the 50 units proposed in the housing land allocation H1/25 which was deleted as a UDP allocation following adverse comments by the Inspector. Circumstances have not changed and the site does not have capacity to accommodate 50 dwellings.</p> <p>7.4 In the above context we consider that the scale of the allocation should be reduced and the numbers apportioned between that site and the site promoted by my client. This has been substantiated by evidence submitted in the form of an updated Ecological Appraisal which</p>

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							<p>disputes that the allocated site could accommodate 50 dwellings without major ecological impacts.</p> <p>7.5 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>7.6 In light of the above, it is, therefore, considered that Neath Port Talbot County Borough Council should, in making future Focused Changes, take these representations into account and identify land to the east, in combination with, land to the west, of Ynys Y Mond Road, Alltwn, Pontardawe as a housing land allocation site for 25 dwellings which is deliverable in terms of access and addressing environmental issues.</p>
Dep711	Mr Cledwyn Edwards	Tonmawr Rugby Football Club	588833	Object	Housing Sites	Policy H 1	<p>Land to the East of Tonmawr RFC Club House</p> <p>We wish to see the site included within the settlement limits (Policy SC1 and Proposals Map) and subject to a housing land allocation under Policy H1.</p> <p>The future development potential of the land, which was identified within the UDP settlement limits, needs to be safeguarded, as a future housing scheme would not only provide a range and choice of new dwellings and contribute to the regeneration of the village, but receipts from the sale of land would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches.</p> <p>1.0 INTRODUCTION</p> <p>1.1 These representations are submitted on behalf of Tonmawr Rugby Football Club (RFC) who are promoting land for development on their existing clubhouse site together with open land to the east. It is disappointing that, while the clubhouse site remains within settlement limits in the Deposit Local Development Plan, land to the east, which is within the Club's ownership, and which is included within the current adopted Unitary Development Plan boundary, is proposed to be excluded.</p> <p>1.2 We are also aggrieved that, despite the requirements of the Local Development Plan process to engage with key stakeholders, Tonmawr RFC were not consulted at any previous stage of the Plan process regarding the decision to exclude the land.</p> <p>1.3 Tonmawr RFC represent a key organisation in the village, which caters for young people, provides community facilities in the club house (there is no pub), and allows the nearby primary school to use its pitches.</p> <p>1.4 The future development potential of the land concerned needs to be safeguarded, as a future housing scheme would not only provide a range and choice of new dwellings and contribute to the regeneration of the village, but receipts from the sale of land would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches.</p> <p>1.5 Section 2 of this submission describes the site. Section 3 provides representations on the Plan Strategy; Section 3 discusses the Overarching, Area and Topic Based Policies; Section 5 discussed the Sustainability Appraisal Self Assessment; and Conclusions are made in Section 6.</p> <p>2.0 SITE DESCRIPTION</p> <p>2.1 Location Tonmawr is a former coal mining village lying some 4 kilometres east of Cimla, 6 kilometres east of Neath Town Centre and some 1.5 kilometres north of the linear settlement of Efail Fach/Pontrhydyfen. In the Deposit LDP - Settlement Topic Paper (August 2013), under the Afan Valley Spatial Area, Tonmawr is described as : 'a sizeable settlement located north-east of Efail Fach. It offers a good range of community facilities as well as local business premises for employment uses.</p>

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							<p>2.2 Site Description The site has an area of 1.98 hectares and lies to the south of Tonmawr Road, an unclassified road which joins the B4287 Road at Efail Fach. The site comprises two distinct parts, the Rugby Club site, with the club building and associated car park and grassed areas, and the open land to the east.</p> <p>2.3 An access is achieved from Tonmawr Road some 40 metres north of the Club building which also serves the adjacent Community Centre. To the north is a stream, the Afon Pellena. The northern boundary of the site has been drawn to exclude an area of flood risk associated with the stream.</p> <p>2.4 The land to the east has a moderate slope upwards to the south-east where it bounds a forestry track now also used as a recreational route. The site comprises bracken and scrub and is bounded to the north and east by large mature trees, a mixture of broad leaved and conifer species.</p> <p>3.0 REPRESENTATIONS ON THE PLAN STRATEGY</p> <p>3.1 Section 2 - The Strategy is supported , in particular the Area Based Objective OB6 , i.e. 'Reinvigorate the Valley Areas and improve economic prospects recognising the role of Glynneath and Pontardawe in delivering sustainable growth.'</p> <p>3.2 Objective OB7, which seeks to 'Provide an adequate supply, mix type and tenure of housing within sustainable settlements to meet the needs of the projected population' is also generally supported.</p> <p>3.3 The Spatial Strategy, which influences the distribution of growth "focuses new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities." As such it is intended to focus the majority of development along the M4 corridor and in the urban areas of Neath and Port Talbot. It is recognised that the economic-led growth strategy will result in the majority of housing (8,000 new homes) and employment (3,850 new jobs) land being concentrated in the coastal area.</p> <p>3.4 Paragraph 2.5.3 refers to a more flexible approach to development in the Valleys compared to the coastal corridor, which will help to invigorate communities. Paragraph 2.5.4 states that the settlement strategy is a fundamental mechanism, identifying communities that have the sufficient capacity and resources to accommodate development within designated boundaries.</p> <p>3.5 Whilst the above elements of the Plan can be considered sound, the means by which these aims are intended to be achieved are disputed. We shall therefore elaborate in our following comments on the Overarching and Topic Based Policies.</p> <p>4.0 REPRESENTATIONS ON OVERARCHING, AREA AND TOPIC BASED POLICIES</p> <p>4.1 Despite the provisions in the Settlement Strategy which relate to the need for flexibility in the Valley areas, in the case of Tonmawr, the potential for such flexibility has been diminished by the 'drawing in' of settlement limits and the consequent reduction of land which is capable of providing for much needed growth in a community acknowledged in the Settlement Topic Paper as having a good range of community facilities. These include a shop/post office, primary school, hourly bus service (159 - Neath to Blaengwynfi), community centre, employment uses, and as a focus for the community, the rugby club. The club is very much the focal point of the local and wider community not only providing facilities for rugby but also numerous other activities. Many organisations use the facilities for a variety of activities, i.e. school's sport's days, village fayre, Community First activities, PTA fund raising activities, BBQ's, ladies & male choirs, senior citizens, church. Many charity events, fundraising events are held at the clubhouse and playing fields contributing to an energetic community spirit.</p> <p>4.2 In terms of Overarching Policies in Section 3, Policy SP3 (Sustainable Communities) which includes Tonmawr as a 'Small Local Centre' is acknowledged. The site being promoted, however, is not included within the settlement limits as identified on the Proposals Maps. Policy SC1 (Settlement Limits), and the Proposals Map are consequently objected to.</p> <p>4.3 Whilst Policy SC1 gives criteria for various uses outside the settlement boundary, we suggest that Criterion 12 is amended to include the revised text highlighted below in order to make future provision for facilities close to the existing pitches:</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>12. It constitutes the provision of Open Space and (small scale) ancillary facilities for existing recreation uses adjoining the settlement limit.</p> <p>4.4 As the combined club house site and land to the east is capable of accommodating a development in excess of 10 dwellings we also object to its non inclusion as a housing land allocation under Policy H1 in Section 5 - Topic Based Policies.</p> <p>4.5 It is noted that no new housing allocations are proposed in the Afan Valley area (Table 5.3) with only allowances for windfall and infill developments which amount to some 1.4% of the total housing development proposed in the County Borough as a whole.</p> <p>4.6 This is clearly inadequate, as in the other valley areas such as the Neath Valley, future growth is inked directly to tourism and employment initiatives. The Afan Valley has a growing reputation for cycling and other activities and provision should be made for appropriate development which will be attracted by the raised profile of the area. Various recreational initiatives, such as that proposed by Tonmawr Rugby Club, will also build on the leisure and tourism offer of the area.</p> <p>4.7 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>5.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE</p> <p>5.1 A Sustainability Appraisal of the site, using the Council's 'Traffic Light' methodology is included.</p> <p>5.2 This shows clearly that there are 10 positive scores, two neutral scores and one 'not applicable'. There are no negative factors identified. Clearly the benefits of developing the site would considerably out-weigh any negative factors. This points to a sound argument for seeking the site's allocation for housing.</p> <p>5.3 Table D.2 of the LDP Settlement Topic Paper shows that 12 services and facilities exist in Tonmawr which compares positively with other settlements, and bears out the findings of the Sustainability Appraisal.</p> <p>5.4 One factor which my clients have considered which could have contributed to the removal of the site from development limits is the fact that it has not emerged to date since the Unitary Development Plan was adopted.</p> <p>5.5 The undeveloped land was originally purchased from the Forestry Commission subject to a covenant restricting the future use to recreation or agriculture purposes. Recent discussions have been held with the NRW, who have responded positively to the modification of the covenant, subject to a proportion of the development value of the site.</p> <p>6.0 CONCLUSIONS</p> <p>6.1 This Submission has been prepared on behalf of Tonmawr Rugby Football Club who are promoting land for residential development. This includes the current club house and undeveloped land to the east which is included within the current Unitary Development Plan Settlement Limits for the village.</p> <p>6.2 In the Deposit Local Development Plan, however, the land to the east is not favoured for development. My clients are disappointed in this context that, despite the LDP process aiming to be transparent with comprehensive stakeholder involvement, they were not consulted on the decision to remove the land from the village settlement limits.</p> <p>6.3 Consequently we wish to object to the land to the east of the club house not being included within the village settlement limits and we object to the whole site's non inclusion as a housing land allocation. We also suggest revised wording to Policy SC1 in order to allow for the future relocation of the club house with ancillary recreational facilities, in the form of an indoor training area/gymnasium.</p>

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							<p>6.4 It is intended that receipts from the sale of the land for housing would finance such a new facility on land adjacent to the current rugby pitches. There would thus be significant benefits to the community and the regeneration of the area.</p> <p>6.5 A Sustainability Appraisal, using the Council's own methodology has established that positive benefits of allocating the site would far outweigh any negative aspects. As such we consider that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below.</p> <p>CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.</p> <p>CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>6.6 We therefore urge the Council to respond in a positive way by including the site in any future Focused Changes to the Plan.</p>
Dep713	Ms Leanne Morgan		787365	Object	Housing Sites	Policy H 1	<p>Land to the rear of Upper Coelbren Road, Gwaun Cae Gurwen</p> <p>I am submitting the drive and garden adjacent to my house and the field that I own behind it. The field has its own access to the main road. I own all the land. I am proposing the site to be considered for residential development.</p>
Dep723	Mr T. Williams		787380	Object	Housing Sites	Policy H 1	<p>Land off B4283 Cefn Cethin, Bryn</p> <p>Only require a mere extension to settlement limit, enough for one dwelling on boundary of settlement, adjacent to existing land where planning permission granted.</p> <p>I believe that the LDP is unsound. Having read the LDP, Candidate Site Assessment Report, Population and Housing Topic Paper, Settlement Topic paper, Economy and Employment Topic Paper there is not enough land in the Valleys.</p> <ul style="list-style-type: none"> • 65 units in Table 5.3 over 15 years is not reinvigoration as it says in the "vision." • 60 windfall sites are no guarantee of any being developed yet I wish to build. • My site is a gateway to the village and as such will be a high quality, well maintained statement property to reflect a new era of reinvigoration • Too many plots are available for large developers and therefore the plan is not flexible. • The Peoples Places Futures, Vibrant Economy, Economic Renewal: A New Direction, Vibrant and Viable Places, Swansea Bay City Region, Economic Growth Strategy, SIP Outcome 3, Western Valleys Strategy, Local Housing Strategy and the Vision all directly state "Valley communities will be supported and revitalised through encouragement of new and expanded economic activity" - how / where? • No industry, no employment that leaves only housing. • Live work only delivers 5 in the monitoring - it has to come from housing. • My site is adjoining, will help a local business continue to farm/ look after animals and maintain the land for future generations. Theft and vandalism and cruelty to stock has almost ended the business. This site will allow not only housing but an agricultural business to thrive. • The Plan is not optimistic, does not plan for vibrancy - as written it merely watches the Valleys die. • The settlement limit policy/ live work allow for extensions from the settlement limit as drawn, I am only asking for the same. <p>Amendment would allow us to build a house allowing us to better deal with issues such as theft etc. Being closer to the farm would assist us in improving the site's quality and surrounding area. As the site already borders the current scope of the LDP, we see little negative impact to extending it a small amount to allow this, especially considering there is planning permission granted mere metres away.</p>
Dep737	Lucy and Patrick Murray		787464	Object	Housing Sites	Policy H 1	<p>Land at Rutherglen Yard, Felindre (Site B)</p> <p>Site History</p>

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							<p>The site was assessed as a candidate site in the LDP Candidate Site Assessment Report ('the Report'). It comprises of 1.4hectares of land and reference to it is to be found at page 81 of the Report. The reasons for not including the site within settlement limits are that 'whilst located adjacent to the existing settlement, if developed, would be considered as an urban expansion into the existing countryside. The land adjacent to the settlement is also steeply sloping and access to the main road would be problematic'.</p> <p>The site is currently within settlement limits as a result of the Inspector's recommendation in the Public Inquiry into the objections made to the Neath Port Talbot Deposit Unitary Development Plan. Neath and Port Talbot County Borough Council (NPTCBC) had sought to exclude the site from settlement limits on the basis that it was open countryside and for highways reasons. After hearing the representations and seeing the evidence presented for both sites the Inspector came to the following conclusion: 'The land plays a role in the local landscape and provides a habitat for wildlife. It is, however, reasonably well situated in relation to local facilities and its lose would not disrupt the landscape setting. Whilst its development would pose difficulties as a result of it being a sloping site any proposal would have to satisfactory address the site planning issues. The Inspector does not recommend that it be included as an allocated housing site rather that it be included within Settlement Limits. Any proposal would have to satisfactorily address site planning issues, including access and the protection of landscape and wildlife features'.</p> <p>The Inspector's recommendations were accepted by NPTCBC and the land was included in the Modifications as an addition to Settlement Limits in the UDP.</p> <p>It is clear therefore that the Inspector specifically considered whether the site if developed would be considered an urban expansion into the countryside and decided that it would not be. NPTCBC accepted this in 2008.</p> <p>No reasons or evidence has been provided as to why when it was agreed by NPTCBC a short time ago that the site was not 'countryside' they now consider it to be so. No reasons or evidence has been provided as to why when it was agreed by NPTCBC that in principle highway issues could be overcome they now consider access to be problematic.</p> <p>It is a cornerstone of public law that government decision-making should be rational, consistent and not arbitrary. In the absence of a change in the definition of 'countryside' or compelling new evidence in relation to the site there can be no rational or sustainable reason for the change in settlement limits excluding the site. Its exclusion therefore fails the tests of consistency and coherence and effectiveness.</p> <p>For the avoidance of doubt, once the reasons for the exclusion from settlement limits fall away, (and it is submitted they must), the site can be seen to fulfil the sustainability and other key policy criteria set out in the Deposit LDP.</p> <p>LDP - policies - reasons why the site should be included within settlement limits.</p> <p>The Development Strategy and Spatial Strategy (paragraphs 2.3.11 and 2.5 LDP). The area along the coastal corridor and the urban areas of Neath and Port Talbot are the focus of development. The site falls within this area. The site is within the top tier of the Settlement Hierarchy set out at Table 8.1of the Settlement Limit Topic Paper and has been therefore identified by NPTCBC as within an area which is the most sustainable location.</p> <p>Social and Environmental Consideration</p> <p>The site has been held not to be an incursion in to open countryside and there is no flood risk.</p> <p>Economy and Employment</p> <p>The site has excellent connections to M4 and Junction 40, minutes away by car. It is within walking and cycling distance of the town centre. There are also excellent transport connections.</p> <p>Sustainable transport</p>

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							<p>The Core network includes the A4107 which abuts the site (5.4.8). This route has been identified in the Regional Transport Plan as part of the Regional Strategic Highway Network consisting of major roads providing key routes through the County Borough. The proposed development of the site will not have an adverse effect on the existing highway network as the Highway Authority have accepted that the new proposed access is technically possible and is an improvement on the existing junction from Bay View. The site is within a walking and cycling distance of the city centre and in existing bus routes.</p> <p>Overarching policies</p> <p>The site comes within the top tier of the Settlement Hierarchy for Neath Port Talbot (Sustainable Communities Table 3.1). It is therefore in the most sustainable location. The site is currently within settlement limits and the decision to include it was made after hearing detailed representations, with the acceptable by the Highway Authorities of a new proposed access from the A4107 and after consideration of an ecological report. Nothing has changed since the last assessment was made to make the site less sustainable. The development of the site would present and enhancement and improvement of the settlements to the north, east and south. The allotment land is currently covered in scrub and impenetrable. New development would maintain mature tress and provide green spaces. It would be a visual improvement on the dense scrub that covers the areas. Any development would not result in the loss of existing community facilities.</p> <p>Area based policies</p> <p>The Coastal Corridor Strategy Area</p> <p>The majority of new residential is to be along the Coastal Corridor and the site lies within this area (4.0.2).</p> <p>Topic Based Policies (in so far as they are relevant)</p> <p>Open Space</p> <p>The proposed development would not lead to a loss of open space.</p> <p>Environment and Resources</p> <p>The site is densely covered with scrub vegetation such as bramble, willow and bracken. No investigation of soils has been conducted but it seems unlikely that the land is of agricultural value. The ecology report conducted by NPTBC for the Public Local Inquiry in August 2005 concluded that the land held little ecological interest and there were no constraints to development. According to the Ecology Report prepared by NPTCBC in 2005 there may be protected species but the report was not conclusive on the presence of these animals. There are some tress on the site but it is mainly covered in bramble, willow and bracken. All native mature trees would be retained as recommended by the Ecology Report 2005. There would therefore be no adverse effects of development.</p> <p>According to the LDP Deposit Plan Map the site comes within a Safeguarded Mineral Resource are Category 1 Sand and Gravel Resource but the objectors have seen no evidence for this nor any reasoning in any document produced by NPT for this categorisation.</p> <p>Housing allocation.</p> <p>It is submitted that due to the sustainability of the site it should be included within housing allocation and within the housing site sin Policy H1 (5.5.1).</p> <p>Summary</p> <p>In summary therefore the site is 'sustainable' in terms of development. It is in the most sustainable location within the Deposit Plan. It abuts the A4107 which affords excellent transport infrastructure. The area cannot be described as countryside. NPTCBC agreed it was not countryside in 2008 and included it within settlement limits; it is almost enclosed by development to all sides except the west; there is no</p>

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							amenity value to the land; the ecological report from 2005 shows that it has little ecological value and the Highway Authority accepted in 2005 that high safety issues can be overcome by a new access from the A4107. By reference to the policies set out in the Deposit LDP it should be included. The exclusion of the site from settlement limits is therefore indefensible as it represents a reversal of NPTCBC's inclusion of the site in 2008. There are no logical, evidential or topographical reasons for the change. It is irrational in a public law sense. The exclusion of the site from settlement limits and housing allocation fails the tests of coherence and effectiveness as the site should be allocated by reference to relevant policies. Further, the failure to allocate the site within settlement limits is not consistent with abutting local residential land use and relevant policies, in particular sustainability.															
Dep742		Tolkein Property Ltd	289531	Object	Housing Sites	Policy H 1	<p>Forge Washery Site, Lower Brynamman</p> <p>The representations are structured as follows:</p> <ul style="list-style-type: none"> • Consideration of housing supply by the Plan at the overall / plan-wide area • An Assessment of the Amman Valley for development • An Assessment of the suitability of the Forge Washery Site for development • Requested / recommended changes to the Plan <p>Consideration of Housing Supply by the Plan</p> <p>In regards to the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> • the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. • the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); • the Authority has chosen not to use the "Moderate" growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan. This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. • the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A: Growth Options Summary</p> <p>As the above table confirms, whilst the now proposed dwelling requirement is higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and the WG 2008 projections. The proposed level of growth is</p>		Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	8,227	548	Deposit LDP	8,027	535	Pre-Deposit Moderate Growth Strategy	6,279	419
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							<p>justified within the Council's Population and Housing Topic Paper (August 2013) as follows: " <i>The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time.</i> " (Paragraph 7.0.8)</p> <p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2,542 units), it is considered that there will be a significant shortfall in housing provision across the County.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that: " <i>Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them...</i> "</p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following: " <i>The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot.</i> " (Paragraph 5.0.7)</p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy. In particular, the level of previous development across the County does not necessarily correlate to the level of need and demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>In addition, these projections overplay the impact of the recent recession on future housing requirement, and do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the economic downturn. It is considered likely that a more stable economic situation may result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years may result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period, not just be based on the short term (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority had not maintained a five year land supply since 2007. Whilst the 2011 and 2012 show a supply of 5.8 years and 6 years respectively, this is due to the method of calculation (i.e. based on previous completions) and is therefore not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these</p>

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							<p>objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. This strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement.</p> <p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings.</p> <p>This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Furthermore, when compared with other emerging LDP's in Wales, it is clear that the allocation for 'uplift' has been significantly underprovided for.</p> <p>In particular and so as to evidence and illustrate out case, Torfaen County Borough Council's Deposit LDP provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council have considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. An extract from the Pembrokeshire County Council Deposit LDP (December 2010) is attached at Appendix 1 of this Annex. This outlines the Housing Requirement for the County over the plan period and illustrates that a contingency of 20% is provided for permissions that are not implemented - but in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for efficient and buoyant housing market". It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP.</p> <p>It is noted that in this regard, the Council states the following within the Population and Housing Topic Paper (August 2013): <i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for upto 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market. (Paragraph 7.0.21)</i></p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations, or give the Valley areas the ability to cater for any demand.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market.</p> <p><i>' Performance' of other LDP's</i> Evidence of the failure of LDP Plans to actually yield and deliver supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's Local Development Plan. This Plan, despite having been relatively recently adopted, has failed to ensure an adequate</p>

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							<p>supply of housing land for the County Borough.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is only a few - 2 - years 'old' - having been adopted in March 2011).</p> <p>The following extract from the 2012 RCT JHLAS is relevant: "<i>The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years</i>"</p> <p>In terms of the 'cause' of this undersupply, the following extract is relevant: "<i>This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone</i>"</p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites: many of which have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites.</p> <p>In any event, the persistent "<i>difficult economic conditions</i>" recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p> <p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded.</p> <p>Assessment of Amman Valley for development</p> <p>Within the Deposit LDP - Population and Housing Topic Paper (August 2013), it is noted that 1.4% (130 dwellings) of the total housing requirements are directed to the Amman Valley. This is higher than the numbers outlined in the previous stages of the plan, and it is considered that this more closely recognises the importance of regenerating the area.</p> <p>In terms of the housing supply for the Amman Valley, it is noted that this is comprised of small sites and a windfall allowance. There are no allocations in the Amman Area and this raises serious questions as to the delivery of the 130 dwellings (an average of 10 dwellings per annum over the plan period) over the plan. This is particularly the case due to both the historically low rate of windfall sites coming forward in the locality and the tightly drawn settlement boundaries in the Deposit LDP which will as a result unduly restrict such opportunities as it is considered to not provide sufficient land to meet the target.</p> <p>The 0% target for affordable housing, for the Amman valley is welcomed as this will ensure that any sites that do come forward will be more readily able to contribute to the wider regeneration aims for the area.</p> <p>It is therefore considered that a wider range and choice of housing sites needs to be provided within the Plan, and specifically the Amman Valley Area, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period.</p>

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							<p>The Forge Washery site is considered to represent the most suitable, appropriate and deliverable option for development within the Amman Valley area (as discussed further below), to ensure that the area is adequately provided for in terms of ensuring adequate housing provision over the Plan period.</p> <p>Assessment of the Suitability of the Forge Washery site for Development</p> <p>The site was previously promoted as part of the Unitary Development Process and is also currently the focus of an outline planning application (P/2008/798) for residential development (with all matters reserved save for the strategic access into the site), which is yet to be determined.</p> <p>As part of the promotion of the site through the previous UDP, a number of issues were agreed as being not in dispute between the applicant and the local authority - these included landscape and visual impact, ground conditions, contamination, ecology, layout, infrastructure and community facilities. These issues, amongst others, were again addressed as part of the supporting information submitted with the planning application.</p> <p>The planning statement for the application deals with the issues that the UDP Inspector raised as part of the consideration of the site as part of the UDP and confirms that they have been resolved.</p> <p>The Inspector considered that insufficient evidence was provided at the time of the UDP Inquiry to demonstrate that site would not flood. In terms of contamination they also considered, due to its historic and current use, that the extent of contamination was not clear.</p> <p>A Flood Consequences Assessment was submitted in support of the outline planning application. Following an initial response from the Environment Agency an addendum report was submitted. The consultation response from the Environment Agency confirms that the site complies with the parameters set out in TAN15. Accordingly no issues of flood risk would arise from the residential development of the site.</p> <p>In terms of the issue of contamination, no objection has been raised by the EA in their consultation response, and relevant planning conditions are suggested. Furthermore, a report on this issue was submitted as part of the outline planning application, and it provides sufficient evidence to identify that this issue would not preclude the residential development of the site.</p> <p>The Inspector considered that, despite it initially appearing that the site is within walking distances of facilities and services in Brynamman, they felt it is more physically separated from the existing settlement.</p> <p>In response to this issue as part of the outline planning application, detailed proposals for alterations to the existing access to the site have been put forward. These include the improvement of the actual access road, associated vision splays, and the incorporation of a dedicated pedestrian footpath. These proposals have been considered acceptable by the highway officers of the Authority.</p> <p>In addition the planning statement demonstrates that in terms of this issue, that the site is well related to the existing settlement of Lower Brynamman. Furthermore there are public transport facilities in the vicinity of the site, and the proposed improvements to the site access road will facilitate improved pedestrian routes to the local services for not just the future residents of the site, but those existing residents who live in the vicinity of the site.</p> <p>In summary it is considered that the redevelopment of the Forge Washery site would, in principle, be an appropriate extension to Lower Brynamman. Housing development on the site would assist in ensuring the continued viability of the existing shops and services, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>It is considered that the residential development of the site will accord within the overall planning policy context at both the national and local level, and ensure that that significant material benefits would be brought about. The key benefits to emerge from the proposals include amongst others:</p> <ul style="list-style-type: none"> • The proposed residential development of the site represents the redevelopment (and more efficient use) of a brownfield site, which

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							<p>is encouraged by both national planning policy guidance and local policy guidance contained within the adopted UDP. The proposed redevelopment represent an opportunity to improve and maintain the local community, thereby positively addressing the issue of population decline, through the provision of homes for local people and this will benefit existing local services and facilities and Welsh language. For instance this could specifically increase the number of pupils at the local school.</p> <ul style="list-style-type: none"> • The proposed redevelopment represent an opportunity to improve and maintain the local community, thereby positively addressing the issue of population decline, through the provision of homes for local people and this will benefit existing local services and facilities and Welsh language. This will support the overall Development Strategy of the LDP. • The site and its general environs exhibit the characteristics of an urbanised area, as evidenced by the presence of a 'cluster' of residential dwellings to the south of the site, the industrial character of the site itself, the relative degree of 'closure' in landscape terms and by virtue of its position, i.e. it immediately abuts the eastern edge of the settlement boundary of Lower Brynamman. • The residential redevelopment of the site will lead to the end of a 'bad neighbour' development of the uses currently undertaken at the site, and its replacement with a more appropriate residential land use. • The redevelopment of the site will prevent an intensification of the current industrial use which could quite lawfully occur under the current parameters at the site. • The redevelopment of the site is supported by the majority of the existing residents adjacent to the site. • The development proposal will improve access to the site and reduce vehicle and pedestrian conflict through the removal of HGV movements associated with the current operational function of the site. • Highway improvements will facilitate improved pedestrian and vehicular linkages between the site and surrounding area, to include the nearby centres of Lower Brynamman and Brynamman, for existing and new residents alike. • The redevelopment of the site will allow the restoration and maintenance of a listed structure providing historic interest to the local community. • The development of the site will not adversely affect any third party land and the flood risks associated with the local fluvial regime are considered to be negligible. <p>As part of the consultation process associated with the planning application, all matters relating to the deliverability of the site have been resolved, save for archaeology where further work is being commissioned to provide a more detailed historical critique of the site (this is considered to not be a fundamental matter which will affect the development of the site. As indicated these include issues such as flooding, contamination, access, etc.</p> <p>Furthermore as part of the consideration and determination of the current application, it is considered that the principle for the redevelopment of the site has been agreed with planning officers. A detailed viability assessment (which has been reviewed and not questioned by the officers in the Estates section of the Authority), has also been submitted in support of the application and this has demonstrated the number of units that are required in order to cover the costs of the remediation, creation of the new access, and the provision of infrastructure and deliver an acceptable developers profit.</p> <p>Accordingly it is considered that the Forge Washery site should be allocated for residential development, and located within settlement limits, as it represents the most deliverable site within the Amman Valley area to locate new housing and contribute to the housing requirements specified within the emerging LDP.</p> <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan subject to these representations, and which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision. • Policy H1 Housing Sites - Allocation of the Forge Washery Site as a residential development site to provide greater choice, flexibility and to ensure the deliverability of sites over the Plan period. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around the Forge Washery Site in order to include the proposed alternative site.

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							It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.
Dep743	Lucy and Patrick Murray		787464	Object	Housing Sites	Policy H 1	<p>Land at Rutherglen Yard, Felindre (Site A)</p> <p>Site History</p> <p>The site was assessed as a candidate site in the LDP Candidate Site Assessment Report ('the Report'). It comprises of .21 hectares of land and reference to it is to be found at page 42 of the Report. The reasons for not including the site within settlement limits are that 'The site does not provide a natural and logical extension to the settlement (i.e. it is not physically, functionally and visually related to the existing settlement pattern). It is therefore considered an unacceptable intrusion into the countryside.</p> <p>The site is currently outside settlement limits in the UDP. It is submitted that, contrary to the NPTCBC's assertion, the site is physically, functionally and visually related to the existing settlement pattern. It is abutted by housing to the north (Bay View), to the south (Rutherglen) and to the east. It is enclosed by development save for on the west where physically, functionally and visually open countryside begins. Any development would be small scale due to the steeply sloping nature of the site and the existence of Tree Preservation orders.</p> <p>LDP - policies - reasons why the site should be included within settlement limits.</p> <p>The Development Strategy and Spatial Strategy (paragraphs 2.3.11 and 2.5 LDP). The area along the coastal corridor and the urban areas of Neath and Port Talbot are the focus of development. The site falls within this area. The site is within the top tier of the Settlement Hierarchy set out at Table 8.1 of the Settlement Limit Topic Paper and has been therefore identified by NPTCBC as within an area which is the most sustainable location.</p> <p>Social and Environmental Consideration There is no flood risk.</p> <p>Economy and Employment The site has excellent connections to M4 and Junction 40, minutes away by car. It is within walking and cycling distance of the town centre. There are also excellent transport connections.</p> <p>Sustainable transport The Core network includes the A4107 which abuts the site (5.4.8). This route has been identified in the Regional Transport Plan as part of the Regional Strategic Highway Network consisting of major roads providing key routes through the County Borough. The proposed development of the site will not have an adverse effect on the existing highway network as the Highway Authority have accepted that the new proposed access is technically possible and is an improvement on the existing junction from Bay View. The site is within a walking and cycling distance of the city centre and in existing bus routes.</p> <p>Overarching policies The site comes within the top tier of the Settlement Hierarchy for Neath Port Talbot (Sustainable Communities Table 3.1). It is therefore in the most sustainable location. Any development would not result on the loss of existing community facilities.</p> <p>Area based policies The Coastal Corridor Strategy Area The majority of new residential is to be along the Coastal Corridor and the site lies within this area (4.0.2).</p> <p>Topic Based Policies (in so far as they are relevant) Open Space The proposed development would not lead to a loss of open space. It is envisaged that as only a small number of houses could be built on the site much of the land would be opened up to the public for use as a green space. The public currently do not have access and the site is disused. A playground could be built as part of the development.</p>

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							<p>Environment and Resources No investigation of soils has been conducted but it seems unlikely that the land is of agricultural value. According to the LDP Deposit Plan Map the site comes within a Safeguarded Mineral Resource are Category 1 Sand and Gravel Resource but the objectors have seen no evidence for this nor any reasoning in any document produced by NPT for this categorisation.</p> <p>Housing allocation. It is submitted that due to the sustainability of the site it should be included within housing allocation and within the housing site sin Policy H1 (5.5.1).</p> <p>Summary</p> <p>In summary therefore the site is 'sustainable' in terms of development. It is in the most sustainable location within the Deposit Plan. It abuts the A4107 which affords excellent transport infrastructure. The area should not be described as countryside. It is almost enclosed by development to all sides except the west. There is no amenity value to the land. By reference to the policies set out in the Deposit LDP it should be included within settlement limits and housing allocation. The exclusion of the site from settlement limits and housing allocation fails the tests of coherence and effectiveness as the site should be allocated by reference to relevant policies. Further, the failure to allocate the site within settlement limits is not consistent with abutting local residential land use and relevant policies, in particular sustainability.</p>
Dep750	Mr Keith Miller		278706	Object	Housing Sites	Policy H 1	<p>Land at Maes y Gwilog Farm, Crymlyn Road, Skewen</p> <p>SUMMARY OF SUBMISSION</p> <p>1.0 INTRODUCTION</p> <p>1.1 This alternative site at Maes Y Gwilog Farm is being promoted by CDN Planning (Wales) Ltd on behalf of Mr Keith Miller, the landowner.</p> <p>1.2 This site is located on the western fringes of Skewen, directly opposite new housing development being built by Barratt Homes. This new development (Crymlyn Grove) includes 81 dwellings in Phase 1, 75 in Phase 2 and a proposed 150 in Phase 3.</p> <p>1.3 Crymlyn Road leads west from Skewen, passing over the M4, and connects to both this alternative site and Crymlyn Grove. It continues over the Swansea freight railway line and leads to the eastern suburbs of Swansea near Llansamlet.</p> <p>1.4 The site is surrounded on most boundaries by trees, including woodland to the south and west. The railway forms a further defensible boundary between the site and Crymlyn Bog beyond. To the south east, at a lower altitude, lies a reservoir that was associated with the Llandarcy refinery. The refinery is now being redeveloped as a major new settlement. A northern access to Coed Darcy would link with Crymlyn Road to the east of Maes Y Gwilog.</p> <p>2.0 SITE PROPOSALS</p> <p>2.1 Previously outline planning permission for 18 dwellings plus access was applied for in 2007 (P2007/0887), but was refused solely because the site was outside the settlement boundary as defined in the UDP. For the avoidance of doubt, the LPA did not refuse the application due to any technical reasons such as highways impact, access, natural environment or landscape reasons. The application was to provide a number of residential plots for individuals to purchase and develop themselves.</p> <p>2.2 This remains the case and will allow local people to build houses that meet their requirements for a far cheaper cost than normally available. This will also help stimulate the local economy as it is far more likely that local builders will be used and goods will be purchased locally.</p> <p>2.3 The site was reviewed by the planning department in NPT and by stakeholders at the time of the planning application and was seen as suitable for building with no local complaints or issues being raised against the site other than one comment on potential noise from the</p>

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							<p>building of houses there.</p> <p>2.4 It should also be noted that there has been no change of circumstances since the earlier UDP drafts which included the site within the settlement boundary.</p> <p>2.5 After planning permission was refused, Mr Miller appealed the decision. It should be noted that the particular reason used by the appeals inspector to reject the site in 2008 stating that "the development particularly the removal of the hedges to the highway boundary would significantly alter the appearance of the area" was unfounded. The submission then (and now) does NOT touch the highway boundaries at all. Moreover a suitable access can be achieved, including visibility, using the existing access - the Highways Authority did not object to the planning application.</p> <p>2.6 The site adjoins Coed Darcy which will allow schools and supermarkets to be within walking distance when they come online there. In the meantime these services are found close by in the centre of Skewen and can be accessed via the bus service coming online to serve Crymlyn Grove on the other side of the road. This of course helps make the site sustainable, but further sustainability benefits will arise because the anticipated development would maximize energy efficiency and encourage domestic-scale renewables.</p> <p>2.7 The site is flat with few trees which are at the edges of the land which allows development with minimal environmental impact.</p> <p>2.8 The site is fully supported as a sensible place to build by the local councillor who has had the opportunity to visit and inspect the site for himself and who sees the development as in keeping with the adjoining Coed D'Arcy and Barratt developments on either side. The local councillor has allowed the use of his name in support of this proposal.</p> <p>2.9 It is proposed to incentivise builders financially to use low carbon and sustainable technologies via differentiated plot pricing which rewards energy efficient builds. This will force more energy efficient and sustainable houses to be built than standard housing such as built in the area today by national builders.</p> <p>2.10 The Skewen area currently has no area identified where single plots can be purchased and to allow local people to build their own housing to their own specifications cost effectively. This is a unique feature of the proposition of this site in Skewen and would contribute incredibly positively to meeting the LDP's stated vision and objectives.</p> <p>2.11 The current railway line adjoining on the western side acts as a clear boundary to building in NPT and is a defensible boundary with the Swansea area and Crymlyn bog on the other side. Development of this land would define the western extent of Skewen in a similar manner to the larger volume house builder-lead development to the north of Crymlyn Road.</p> <p>2.12 It is noted that paragraph 3.0.13 of the Deposit LDP sets out the purpose of settlement boundaries. It is advocated that effectively using the railway line as the western extent of Skewen, thus including Maes Y Gwilog Farm within the settlement, would conform to the purposes described.</p> <p>2.13 As the site has very little landscape or biodiversity value, and is located on the Skewen-side of the railway line, it reads as a logical development site that can be designed and built in a very sensitive and suitable manner, delivering homes in the right place at the right time.</p>
Dep757		Natural Resources Wales	748015	Object	Housing Sites	Policy H 1	<p>Land to the South of Tonmawr Road, Tonmawr</p> <p>It is submitted that the site shown on the attached plan, which comprises 2.19 hectares, should be allocated for housing in the LDP.</p> <p>The site falls within the Valleys Strategy Area, where the Council plan to re-invigorate the Valleys. The allocation of this site for housing would be compatible within this strategic aim.</p> <p>SP7 identifies a dwelling requirement of 9,150 units, based on an estimated increase in households of 8027 over the plan period, which is significantly lower than the latest Welsh Government (2008) Household Projections of 10,000 households. This is a significant departure</p>

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							<p>which is not justified by the supporting evidence base.</p> <p>Although the site was included within the settlement boundary in the adopted UDP, it now falls outside of the LDP settlement limits for Tonmawr. However, the site relates well to the built form of Tonmawr, is suitable for development and it is submitted that the settlement limit be re-defined to include this site. There is existing housing to the west and north and forestry land to the south, west and east, the proposal is compatible with surrounding land-uses.</p> <p>The site is not protected by any special protective countryside designation.</p> <p>The allocation of this site would support the Welsh Government's commitment to stimulate house building and to increase the stock of affordable homes, as set out in the Ministerial Statement issued earlier this year, by the Minister for Housing and Regeneration. The statement makes reference to identifying public land for development as a key intervention that can be made.</p> <p>The site is well linked by road to nearby Neath and there are regular hourly bus services, service number 159, which links Tonmawr to Neath, Cimla and Pontrhydyfen. There is access to rail transport at Neath, which is a distance of approximately 5.5 kilometres away. The site is also well located to connect into the network of footpaths, cycle routes and bridleways which are available locally.</p> <p>The site is partly in public ownership and its allocation for residential development, could assist in the bringing forward much needed housing development the Valleys Area of Neath Port Talbot Borough. Consideration will be given to the construction of carbon-negative and carbon neutral homes, within this site, making use of locally sourced carbon sequestering materials.</p> <p>The proposed new housing would also support local services and facilities and could also lead to the establishment of new services in this part of the Borough.</p> <p>The development scheme would bring about local benefits in the form of the provision of public open space and contributions to community services and facilities. Part of the site is owned by Tonmawr Rugby Club and the development of this site for housing would facilitate the provision of a new club house adjacent to the rugby pitches. In addition,</p> <p>The proposal would help the Council with their objective to re-generate valleys communities.</p>
Dep759		Development Securities	589615	Object	Retail Hierarchy for Neath Port Talbot	Table 5.4	<p>Baglan Moors Retail Park</p> <p>This Annex sets out the detailed case in support of these representations.</p> <p>It provides both a critique of the current provisions of the plan, and suggested changes to its content. The representations are structured as follows:</p> <ul style="list-style-type: none"> • Consideration of retail issues of Deposit LDP Proposals report. • An Assessment of the characteristics of Baglan Moors District Centre / Retail Park. • Requested / recommended changes to the Plan. <p>Consideration of Retail Issues of Deposit LDP</p> <p>It is indicated in the LDP that the UDP retail hierarchy has been reviewed to ensure that it reflects the current role and function of the retail centres. It is further recognised in paragraph 5.2.35 that the LDP's strategy is to support the existing retail centres through the protection and encouragement of retail provision in appropriate locations.</p> <p>In the Deposit LDP, the existing Baglan Moors District Centre (as allocated within the current adopted UDP as a district centre) which comprises of the Morrison's Petrol Station and Food Store, and the adjoining retail park and public house / restaurant, is not allocated as forming part of the retail hierarchy . There is however no explanatory text in the Deposit LDP to indicate how these retail parks would function in terms of the range / type of retailing that would be considered acceptable. Furthermore there is no commentary or justification</p>

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							<p>within the Retail Topic Paper (August 2013) as to why the existing Baglan Moors District Centre should be removed from the retail hierarchy.</p> <p>It is considered that the current district centre allocation in the UDP recognises the status / importance that the district centre and retail park plays in meeting the retail and service needs of the local population - in that it is a more preferable location for retail growth over other out of centre locations outside of the town, district and local centres, it is considered that it should still be allocated as a district centre in its entirety. This is due to the site specific considerations that we have outlined as part of our previous representations (and again covered in further detail below) and to reflect the significant level of housing growth that is proposed within the vicinity of Baglan Moors District / Retail park over the LDP plan period. The proposed housing allocations within the Deposit Plan Proposals Report include:</p> <ul style="list-style-type: none"> • H1/LB/15 Stycyllwen - 24 dwellings • H1/LB/16 Abbotsmoor - 42 dwellings • H1/17 Harbourside - 520 dwellings • H1/18 Afon Lido - 150 dwellings • H1/20 Purcell Avenue - 115 dwellings • H1/21 Morfa - 10 dwellings • H1/22 Tir Morfa - 75 <p>Within the Deposit LDP, due to the removal of currently allocated the Baglan Moors District Centre, there is not a district centre within close proximity to serve the retail and service needs of the existing / future population. Within the GA retail study it is confirmed that currently 36% of the residents within the Port Talbot area shop at Morrison's within the Baglan Moors District Centre for their main food shop. This evidences the fact that the current district centre is well used, and that there will be a significant number of linked trips with the other retail shops located within the wider retail park. Accordingly, it is considered that there is a sustainability case for the retention, and widening, of the district centre designation. It is within an easy walking distance of both existing and proposed housing, and it has good public transport links to the wider area.</p> <p>Assessment of the characteristics of Baglan Moors District Centre / Retail Park</p> <p>As outlined within the submissions previously made to the emerging LDP, the Baglan Moors District Centre, as designated in the adopted Neath Port Talbot Unitary Development Plan (2008), contains a Morrison's foodstore and associated petrol filling station only. At present the designated District Centre does not include any further retail uses (or complementary non-retail services) as appropriate to its role and function as a District Centre an in accordance with the definition of a District Centre outlined in TAN4.</p> <p>In order to ensure that the Baglan Moors District Centre is able to operate as a District Centre as intended within the UDP (i.e. providing a wider selection of services and facilities to serve a range of retail and non-retail needs for local residents within surrounding communities), our previous representations to the emerging LDP have outlined that it should be extended to include the adjoining retail park - not least as it is evident that these uses and facilities already operate and function as a District Centre at present. All of these constituent parts are linked by public footpaths and underpasses linking to the surrounding residential community.</p> <p>Additionally, a planning permission has recently been granted for a public house / restaurant at land to the south of the Morrison's foodstore and north-east of the Baglan Bay Retail Park (Planning Application Ref P/2011/0260). The proposed public house will serve people using the facilities at the Baglan Bay Retail Park and the designated Baglan Moors District Centre, as well as people living and working within the surrounding area. The public house will therefore operate as a complementary use, appropriate to the role and function of the wider District Centre.</p> <p>Furthermore, the Baglan Bay Retail Park has an extant / implemented permission for a chemist / pharmacy - which is considered to represent a further complementary use appropriate to a District Centre, catering for the day-to-day needs of the surrounding community. This is over and above the integrated health centre to the north of the Morrison's foodstore - which serves as a facility for the wider residential area/community, and which draws significant foot fall to the immediate locality.</p> <p>The district centre and retail park is positioned in a sustainable and highly accessible location, which can be easily and conveniently</p>

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							<p>accessed by a range of transport modes including public transport, walking and cycling, serving the needs of the surrounding community going forward over the plan period. In this regard, it should also be noted that the district centre and retail park is highly accessible on foot by residents living within the surrounding communities, in light of excellent pedestrian permeability to / from the site to adjoining residential areas. The district centre and retail park is positioned in a sustainable and highly accessible location, which can be easily and conveniently accessed by a range of transport modes including public transport, walking and cycling, serving the needs of the surrounding community going forward over the plan period. In this regard, it should also be noted that the district centre and retail park is highly accessible on foot by residents living within the surrounding communities, in light of excellent pedestrian permeability to / from the site to adjoining residential areas.</p> <p>In light of these factors, the allocation of the District Centre should be 'rolled forward' into the LDP and the boundary extended accordingly to reflect the way it currently operates/functions. This will ensure that the centre can operate as a District Centre in the wider sense of the definition, to serve the needs of the current and expanding urban settlement.</p> <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit LDP subject to these representations, and which are considered to need amendment are:</p> <p>Retail Hierarchy table 5.4 - Land comprising Morrison's foodstore and petrol filling station (i.e. current District Centre boundary); and land comprising Baglan Bay Retail Park; and land to be developed for public house / restaurant use (located to the south of the Morrison's foodstore and north-east of the Baglan Bay Retail Park) be allocated as a district centre in the LDP.</p> <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep760		Natural Resources Wales	748015	Object	Housing Sites	Policy H 1	<p>Land at Heol y Graig, Cwmgwrach</p> <p>It is submitted that the site shown on the attached plan, which comprises 0.8 hectares should be allocated for housing in the LDP.</p> <p>The site falls within the Valleys Strategy Area, where the Council plan to re-invigorate the Valleys. The allocation of this site for housing would be compatible within this strategic aim.</p> <p>SP7 identifies a dwelling requirement of 9,150 units, based on an estimated increase in households of 8027 over the plan period, which is significantly lower than the latest Welsh Government (2008) Household Projections of 10,000 households. This is a significant departure which is not justified by the supporting evidence base.</p> <p>Although the site falls outside of the settlement limit, it is closely linked to existing settlement limits, being surrounded by residential development on 3 sides. To the west the site adjoins an area of woodland.</p> <p>The site falls within an extensive Special Landscape Area, but it is not justified to include the site within this designation as it is largely surrounded by housing. Its development for housing would not have an adverse impact upon the Special Landscape Area as a whole.</p> <p>The allocation of this site would support the Welsh Government's commitment to stimulate house building and to increase the stock of affordable homes, as set out in the Ministerial Statement issued earlier this year, by the Minister for Housing and Regeneration. The statement makes reference to identifying public land for development as a key intervention that can be made.</p> <p>The allocation of this publicly owned site for residential development, could assist in the bringing forward of much needed housing development in the Neath Port Talbot Borough.</p> <p>The site is well linked by road to nearby Neath and Glynneath and there are regular half hourly bus services, the X5, which links Cwmgwrach to Neath and Swansea to the west, and Glynneath, which is located a short distance to the north-east. There is access to rail transport at Neath, which is a distance of 18 kilometres away. The site is also well located to connect into the network of footpaths, cycle</p>

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							<p>routes and bridleways which are available locally.</p> <p>The development of new housing would support local services and facilities and could also lead to the establishment of new services in this part of the Borough.</p> <p>The development scheme would bring about local benefits in the form of the provision of public open space and contributions to services and facilities.</p>
Dep764		Natural Resources Wales	748015	Object	Housing Sites	Policy H 1	<p>Land off Tan y Rhiw Road, Glyncastle, Resolven</p> <p>It is submitted that the site shown on the attached plan, which comprises 2.2 hectares, should be allocated for housing in the LDP. It is also submitted that the settlement boundary from the UDP should be re-instated and extended to include this site.</p> <p>The site falls within the Valleys Strategy Area, where the Council plan to re-invigorate the Valleys. The allocation of this site for housing would be compatible within this strategic aim.</p> <p>SP7 identifies a dwelling requirement of 9,150 units, based on an estimated increase in households of 8027 over the plan period, which is significantly lower than the latest Welsh Government (2008) Household Projections of 10,000 households. This is a significant departure which is not justified by the supporting evidence base.</p> <p>Although the site falls outside of the settlement limit, it is close to existing settlement limits and adjoins existing residential development to the south and west. To the east and the north the site adjoins areas of forestry.</p> <p>The site falls within an extensive Special Landscape Area, but its development for housing would not have a significant adverse impact upon the Special Landscape Area as a whole.</p> <p>The allocation of this site would support the Welsh Government's commitment to stimulate house building and to increase the stock of affordable homes, as set out in the Ministerial Statement issued earlier this year, by the Minister for Housing and Regeneration. The statement makes reference to identifying public land for development as a key intervention that can be made.</p> <p>The allocation of this publicly owned site for residential development, could assist in the bringing forward of much needed housing development in the Neath Port Talbot Borough. It is noted that there are no housing land allocations in Resolven in the LDP and an allocation here would help support and provide local services and community facilities. Consideration will be given to the construction of carbon-negative and carbon neutral homes within this site making use of locally sourced materials.</p> <p>The site is well linked by road to nearby Neath and Glynneath and there are regular half hourly bus services, the X5, which links Resolven to Swansea, Neath and Glynneath. There is access to rail transport at Neath, which is a distance of 9 kilometres away. The site is also well located to connect into the network of footpaths, cycle routes and bridleways which are available locally. There is scope to carry out highway improvements to Tan y Rhiw Road if considered necessary. In addition, if required the existing footpath link to the main built up area of Resolven, could be improved and a possible new path for pedestrians and cyclists could be provided in the north-western part of the site.</p> <p>The development of new housing would support local services and facilities and could also lead to the establishment of new services in this part of the Borough.</p> <p>The development scheme would bring about local benefits in the form of the provision of public open space and contributions to local services and facilities and improved footpath and cycle links to the main part of Resolven.</p>
Dep766		Natural Resources Wales	748015	Object	Housing Sites	Policy H 1	<p>Galltewm Terrace, Bryn</p> <p>It is submitted that the site shown on the attached plan, comprising 2 hectares of land, should be allocated for housing in the LDP.</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
							<p>Part of the site is already included within the settlement limit and it is submitted that both this and the adjoining land to the west be allocated for a mix of general and affordable housing.</p> <p>The site falls within the Coastal Corridor Strategy Area, where the Council plan to deliver the majority of the Borough's housing. The allocation of this site for housing would be compatible within this strategic aim.</p> <p>SP7 identifies a dwelling requirement of 9,150 units, based on an estimated increase in households of 8027 over the plan period, which is significantly lower than the latest Welsh Government (2008) Household Projections of 10,000 households. This is a significant departure which is not justified by the supporting evidence base.</p> <p>Although the western part of the site falls outside of the settlement limit, the site would relate well to the built form of Bryn, with housing being located to the north and the east. To the west and the south the site adjoins forestry land.</p> <p>The site falls within an extensive Special Landscape Area, but its development for housing would not have a significant adverse impact upon the Special Landscape Area as a whole.</p> <p>The allocation of this site would support the Welsh Government's commitment to stimulate house building and to increase the stock of affordable homes, as set out in the Ministerial Statement issued earlier this year, by the Minister for Housing and Regeneration. The statement makes reference to identifying public land for development as a key intervention that can be made.</p> <p>The allocation of this publicly owned site for residential development, could assist in the bringing forward of much needed housing development in the Neath Port Talbot Borough. Consideration will be given to the construction of carbon-negative homes within this site making use of locally sourced carbon sequestering materials.</p> <p>The development of new housing would also support local services and facilities and could also lead to the establishment of new services in this part of the Borough.</p> <p>The site is well linked by road to nearby Port Talbot and Maesteg and there are regular bus services, the X3, which link Bryn to Port Talbot, Maesteg, Swansea and Bridgend. There is access to rail transport at Maesteg and Port Talbot, which are located approximately 3 and 6 kilometres away respectively. The site is also well located to connect into the network of footpaths, cycle routes and bridleways which are available locally.</p> <p>The development scheme would bring about local benefits in the form of the provision of public open space and contributions to services, and could provide additional or improved parking for the existing residents of Galltcwm Terrace.</p>
Dep767	Mr M Cuddy	Cuddy Demolition & Dismantling Ltd.	787651	Object	Housing Sites	Policy H 1	<p>Land at Chain Road, Glynneath</p> <p>Consideration of Housing Supply by the Plan</p> <p><i>Overall / Plan-Wide Housing Land Supply</i></p> <p>In regards to the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); the Authority has chosen not to use the "Moderate" growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan. This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan.

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							<ul style="list-style-type: none"> the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1" data-bbox="1222 493 2285 766"> <thead> <tr> <th></th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A Growth options summary</p> <p>As the above table confirms, whilst the now proposed dwelling requirement is higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows: "<i>The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time.</i>" (Paragraph 7.0.8)</p> <p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2542 units), it is considered that there will be a significant shortfall in housing provision across the County.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that: "<i>Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them...</i>"</p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following: "<i>The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot.</i>" (Paragraph 5.0.7)</p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy. In particular, the level of previous development across the County does not necessarily correlate to the level of need and demand within the area. In</p>		Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	8,227	548	Deposit LDP	8,027	535	Pre-Deposit Moderate Growth Strategy	6,279	419
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							<p>addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>In addition, these projections overplay the impact of the recent recession on future housing requirement, and do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the economic downturn. It is considered likely that a more stable economic situation may result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years may result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period, not just be based on the short term (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority had not maintained a five year land supply since 2007. Whilst the 2011 and 2012 show a supply of 5.8 years and 6 years respectively, this is due to the method of calculation (i.e. based on previous completions) and is therefore not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. This strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement.</p> <p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings. This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Furthermore, when compared with other emerging LDP's in Wales, it is clear that the allocation for 'uplift' has been significantly underprovided for. In particular and so as to evidence and illustrate out case, Torfaen County Borough Council's Deposit LDP provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council have considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. Within the Pembrokeshire County Council Deposit LDP (December 2010) a contingency of 20% is provided for permissions that are not implemented - but in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for efficient and buoyant housing market". It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP.</p> <p>It is noted that in this regard, the Council states the following within the Population and Housing Topic Paper (August 2013):</p>

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							<p><i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for up to 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market. (Paragraph 7.0.21)</i></p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, as discussed in further detail below, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market.</p> <p><i>Windfall and Small Sites</i></p> <p>Furthermore, it is noted that 23% of Neath Port Talbot's total dwelling supply is comprised of potential development from windfall sites (2085 dwellings from small sites and windfall sites), which relates to approximately 139 dwellings per annum. It is considered significantly un-sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites.</p> <p>In particular, it is noted that within Neath Port Talbot's Population and Housing Topic Paper (2013), an average of 85 units per annum has been identified for large windfall development (on sites over 10 units) over the plan period, with an average of 54 dwellings per annum coming forward on small sites over the period for 2001/02 - 2011/2012. Within this average rate of 54 dwellings, this ranges significantly from 5 units per annum, to 130 units per annum. Accordingly, based on these trends, it is not considered that the housing provision on windfall and small sites will be developed anywhere near the level of 139 dwellings per annum anticipated and proposed.</p> <p>Furthermore, it is not considered that the historic rate of windfall and small site developments will be able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller 'pool' of potential windfall and small sites being available. Therefore, as the levels of potential windfall and small sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.</p> <p>In addition, the LDP's provision for windfalls is heavily reliant on large sites (over 10 dwellings) coming forward, with 1,275 dwellings proposed on large windfall sites. It is considered likely that higher numbers of small windfalls sites will come forward in comparison to larger windfall sites which may prove more difficult to find as the 'pool' of sites reduces. Accordingly, the LDP's provision for larger windfall sites needs to be reduced in view of the lower levels of larger sites that are likely to come forward within the Plan period.</p> <p>It is therefore considered that the LDP significantly overestimates the levels of dwellings expected to come forward on both windfall and small sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall and small sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly, the provision for windfall and small sites within the total dwelling supply should be reduced, which further establishes the need for the allocation of additional sites for residential development.</p> <p><i>'Performance' of other LDP's</i></p> <p>Evidence of the failure of LDP Plans to actually yield and deliver supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's Local Development Plan. This Plan, despite having been relatively recently adopted, has failed to ensure an adequate</p>

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							<p>supply of housing land for the County Borough.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is only a few - 2 - years 'old' - having been adopted in March 2011).</p> <p>The following extract from the 2012 RCT JHLAS is relevant: "<i>The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years</i>"</p> <p>In terms of the 'cause' of this undersupply, the following extract is relevant: "<i>This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone</i>"</p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites: many of which have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites.</p> <p>In any event, the persistent "<i>difficult economic conditions</i>" recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further. This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, including greenfield sites, should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded.</p> <p>Assessment of the Spatial Options & Valleys Strategy Area</p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. As stated at Paragraph 2.3.11 and 2.3.12: "<i>The Development Strategy aims to: Facilitate growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities. This means: Identifying Pontardawe and the Upper Neath Valley as strategic growth areas in the Valleys</i>".</p> <p>This strategy is supported, as it recognises the need to achieve a balance in terms of housing provision, whilst ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p> <p>The LDP strategy seeks to reinvigorate the Valleys principally through the identification of two growth areas i.e. Pontardawe and the Upper Neath Valley. As set out within Paragraph 2.5.3, within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements where appropriate growth should be focused: "<i>Within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements in which to focus development to ensure benefits of growth and regeneration are shared more widely throughout the valley communities</i>".</p> <p>The sustainability credentials of the settlement of Glynneath in particular are outlined in Paragraph 4.0.30 of the Deposit LDP: "<i>Glynneath is the key settlement in the upper Neath Valley and has good links to the upper Dulais Valley and the Brecon Beacons National</i></p>

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							<p><i>Park as well as to Neath and the Coastal Corridor Strategy Area via the A465 (T) Dual Carriageway. Significant growth in the Glynneath Area / Upper Neath Valley will therefore benefit the wider area and enhance the sustainability and attractiveness of both Glynneath and Resolven".</i></p> <p>Although Glynneath is identified as a Strategic Growth Area, it is not considered that a high enough level of housing is focused within the settlement of Glynneath to achieve the significant levels of growth and development that is anticipated (i.e. as required to generate the associated positive impacts in terms of the benefits of regeneration more widely).</p> <p>It is considered that a more equitable allocation of housing within the two key settlements identified as most appropriate within the Valleys (i.e. Pontardawe and Glynneath) is required in order to ensure that the benefits of growth are distributed evenly throughout the Valleys area. Although Glynneath is identified as a Strategic Growth Area there are only a total of 4 housing sites allocated - such a low level of housing provision within this Strategic Growth Area is considered to jeopardise the aims of the LDP strategy.</p> <p>Within Pontardawe, a total of 614 dwellings are allocated. However, less than half this number of dwellings are allocated in Glynneath (i.e. a total of just 264 dwellings are allocated over the plan period).</p> <p>The largest housing allocation within Glynneath is at Park Avenue. The deliverability of the residential units at this site (particularly in the short to medium terms) is considered doubtful, as the housing allocation forms part of the wider Park Avenue Mixed Use Regeneration Scheme. The scheme relies on the collaboration of a number of parties (both public and private sector) and is considered unlikely to come forward over the short to medium term - thereby further reducing the availability of new housing in the Glynneath area.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>As outlined above, these representations put forward the site at Chain Road as an Alternative Site, in recognition of its suitability to provide for residential development (the site area is approximately 2.8 hectares).</p> <p>The site is considered to be suitable for residential development for the following reasons:</p> <p><i>Accordance with LDP Strategy</i></p> <p>The site is located within a highly sustainable location within the existing settlement of Glynneath. As the LDP strategy contends, Glynneath is considered to represent a sustainable settlement in which development should be focused (to ensure the benefits of growth and regeneration are shared throughout the valley communities). The development of land within the settlement of Glynneath for residential development (including affordable housing) is therefore considered to be in accordance with the LDP strategy, and will assist in stimulating the regeneration of the Upper Neath Valleys.</p> <p><i>Positioning of Site within Existing Residential Settlement</i></p> <p>At present, the site is bound by physical development on all sides i.e. the site is bound by Chain Road and existing residential development to the north and east; by the B4242 to the west; and by the River Neath and A465 trunk road beyond to the south (and as such, the site is located within the boundary of settlement limits within the currently adopted UDP). Furthermore, the land located beyond the B4242 to the west of the site comprises the Glynneath Business Park which has an extant planning permission for the construction of a Primary Health Care Facility.</p> <p>The site is therefore bound by development on all sides - with additional development proposed (and approved) further to the west of the settlement (i.e. incorporating the Primacy Health Care Centre). The boundary of the settlement limit of Glynneath therefore logically follows the extent of development to the west of the Alternative Site.</p> <p><i>Brownfield / Previously Development Land</i></p>

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							<p>The site comprises previously developed / brownfield land (the development of which is encouraged in advance of greenfield land). The site represents a significantly underused parcel of land, which is also located within a highly sustainable settlement. Its redevelopment and re-use for housing cannot therefore be overlooked.</p> <p>It is considered that residential use of the site would be the most appropriate use, being compatible with the primary residential use of the surrounding area. As stated above, the site currently comprises a brownfield site which is currently considered to present an eyesore in its current unkempt condition - the development of the site for a high quality and well planned residential development presents the opportunity to remove this eyesore; substantially upgrade the appearance of the site; and bring this underused parcel of land back into productive use.</p> <p><i>Highways / Accessibility</i></p> <p>The site is accessible directly off Chain Road, which connects to the B4242 to the north. Highway capacity studies have identified that the development of the site for residential development (approximately 50 units) presents no issue in terms of the nearby highway network accommodating the resulting traffic movements. Initial discussions with the Council's Highway Department have indicated that there are no highways issues associated with the residential development of the site.</p> <p>In addition to the site's highly accessible location by car, the site is also well served by public transport. The site is located within approximately 160m of a bus stop along the B4242. This bus stop is served by a regular bus service (approximately half hourly) between Glynneath, Neath and Swansea i.e. the X5, 161 and 906 services.</p> <p>Existing public footpaths within the vicinity of the site are in good condition and are well-lit - these footpaths provide direct pedestrian access from the site into Glynneath, as well as to the surrounding communities of Blaengwrach, Cwmgwrach and Aberpergwm.</p> <p>In terms of provision for cyclists, the Neath section of the National Cycle Network Route 46 is open between the B4242 / Glynneath Link Road priority junction and Clyne along the Neath Canal. The route is traffic free from this junction to Resolven (then continues on-road). In addition, there is an existing Local Route that runs from the site to Blaengwrach and Cwmgwrach (via Chain Road), which also links into National Route 46 at the B4242 / Glynneath Link Road priority junction.</p> <p><i>Community Facilities</i></p> <p>The site is well served by a range of existing local services and facilities - by nature of its positioning within an existing residential area. It is therefore located within convenient walking distance of a number of community facilities. For example, within 400m of the site (i.e. easy and convenient walking distance), the following facilities are located:</p> <ul style="list-style-type: none"> • Leisure Centre • Convenience Shop • Two takeaways • Hairdressers <p>In addition to the above facilities, within approximately 10 minutes' walk is the district centre of Glynneath, which provides a full range of services and facilities - including a post office / banks/ various shops / cafes / public houses etc.</p> <p>In regards to education provision, there is a primary school located within 0.4 miles of the site (Blaengwrach Primary School), as well as a Welsh medium primary school within 0.9 miles (Ysgol Cwmnedd).</p> <p>The Glynneath Clinic is located within 0.7 miles of the site. In addition, a new Primary Health Care Facility has planning permission for development on land immediately adjacent to the site.</p> <p>The area immediately surrounding the site has many attractive walking and cycling routes which allow access to the picturesque landscape and scenery the area has to offer in addition to a variety of existing sports, leisure and community facilities. In particular, there is a leisure</p>

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							<p>centre (with associated recreational space) located within approximately 160 metres of the site (2 minutes walking distance).</p> <p><i>Employment</i></p> <p>The strategically located settlement of Glynneath is situated along a key transport corridor, with the A465 (T) linking the Heads of the Valleys Road and the Midlands to Neath, Swansea, Cardiff and West Wales. Its location allows the town to provide cross valley links, serving a range of settlements from both the Neath and Dulais Valley. Glynneath has a range of employment opportunities focused around the existing retail centre, village workshops, tourism industry and mineral operations that are still present in the Neath Valley.</p> <p><i>Flood Risk</i></p> <p>Part of the Alternative Site is located within Flood Zone C2 as outlined on the Technical Advice Note (TAN) 15 Development Advice Map (DAM). A Full Planning Application for residential development is currently being prepared, and as part of this application, a Flood Consequences Assessment (FCA) is being undertaken. As part of the FCA, a developable site area has been identified (in line with TAN 15 requirements). It has been evidenced as part of the FCA that approximately 50 units can be accommodated on the developable area of the site in line with the requirements of TAN 15 i.e. the development will have adequate protection; the consequences of extreme flooding will be acceptable and manageable; and flood risk to third parties will not be exacerbated.</p> <p><i>Services</i></p> <p>The site is vacant, other than an electricity substation compound bounded by a palisade fence located within the western portion of the site which is served by overhead and underground cables. Discussions have been held with Western Power Distribution and an on-site meeting held, which has established a way forward for the development of the site, in terms of the relocation of all equipment. Existing Western Power services will be diverted, with existing overhead services being relocated underground at the site boundary and obsolete equipment removed. To confirm, initial investigations with all services providers (i.e. Welsh Water; Wales & West Utilities; Western Power Distribution; and BT) have not identified any constraint to the development of the site. In addition, initial investigations with all providers (have established that the site is able to be served by existing utilities infrastructure.</p> <p><i>Ground Conditions</i></p> <p>A Ground Conditions Desk Study Report has been prepared for the site - this has not identified any ground conditions that would preclude the site's development.</p> <p><i>Environmental Health / Amenity</i></p> <p>The development of the site will not create a potential nuisance in terms of air, light, noise or waste.</p> <p><i>Ecology</i></p> <p>A Phase 1 Habitat Survey has been carried out on the site. This has not identified any important habitats or species on the site. However, in light of the presence of the River Neath within close proximity of the site, it is assumed that wildlife utilise the river corridor. The site layout for the residential development of the site has therefore incorporated appropriate mitigation measures accordingly.</p> <p><i>Economic Viability</i></p> <p>There are no economic constraints which will affect the development of the site within the plan period. The site is in the sole ownership of the Representee, and the landowner is in agreement with the proposed land use of the site. There are no restrictive covenants relating to the use of the land, and it has been established and confirmed that the site is able to be served by existing utilities infrastructure.</p> <p><i>Summary</i></p>

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							<p>To summarise, the site comprises of an underused parcel of previously developed / brownfield land, located within the highly sustainable settlement of Glynneath, which is served by a wide range of local services and facilities, and is easily accessible by public transport. Investigations have identified that there are no insurmountable constraints to the development of the site - the site is therefore prime for re-use for residential development.</p> <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan subject to these representations, and which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement - increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and reduction in the provision for windfall sites. • Policy H1 Housing Sites - allocation of Alternative Site (Land at Chain Road) as a residential development site. • Policy SC 1 Settlement Limits - amendment of the settlement limits at Glynneath to include the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep774	Mr M Gwynne		787697	Object	Housing Sites	Policy H 1	<p>Land at Moorlands Dyffryn Cellwen</p> <p>Seeking allocation of new residential development site. Additional land is required within the settlement limit of Dyffryn Cellwen. Part of the site is already the subject of a detailed planning permission for 5no. dwellings (Application no. P2004/1547 refers) which has commenced and is to be served by a standard estate road access.</p>
Dep781	Mr Wayne Rees	Macob Property Holdings Ltd.	787696	Object	Housing Sites	Policy H 1	<p>Tyn-y-Caeau Farm, Margam</p> <p>The site being promoted at Tyn -y- Caeau Farm, Margam, is currently excluded from the Settlement Limits (Inset 48 of the Proposals Map) and is also excluded from the wider Employment Land (EC1/2) and Waste (W1/1(b) allocations. It therefore constitutes unallocated land which is contained by proposed uses on three sides and substantial route corridors to the east.</p> <p>There are existing residential uses in the form of the farm house and a detached 2-storey annex which accommodates 6 bed sitting units. The site is well screened from proposed employment and waste uses by belts of woodland. Proposed adjacent uses will, in any event have to take into consideration the presence of these residential uses by further landscaping and the siting of compatible B1 uses.</p> <p>A residential scheme is therefore proposed which could achieve integration as part of an overall mixed use form of development.</p> <p>We wish to see the site included within the settlement limits (Policy SC1 and proposals map) and subject to a housing land allocation under Policy H1 as part of a wider mixed use development.</p> <p>The site is currently excluded from the wider employment and waste allocations and as a result the Deposit Plan lacks cohesion. There is a need to maximise the use of land as a resource and the omission of the site in question is unsound. If the site were identified for housing as part of a mixed use scheme, the sustainability credentials of the plan would be improved.</p>
Dep789	The Executor of the late Mrs Elizabeth Mayberry		428104	Object	Housing Sites	Policy H 1	<p>Land at Ynysgerwyn Farm, Aberdulais</p> <ol style="list-style-type: none"> 1. The development of the site constitutes an acceptable expansion into the open countryside as the land on the opposite side of the classifies road was developed for industrial purposes in the 1960's/1970's. 2. The industrial development referred to also resulted in the construction of a dual carriageway along the site frontage thereby adding to the urban appearance of the immediate area. 3. The development of the land would therefore constitute a rounding off of the settlement of Aberdulais.

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							<p>4. The settlement is already served by the following facilities which are within a reasonable walking distance;</p> <ul style="list-style-type: none"> • a. Aberdulais Family Fayre retail shop • b. Aberdulais Community Centre • c. Ynysygerwyn Cricket Club which in addition to being a recreational facility with both junior and senior teams is used by the community for bingo, slimming classes etc • d. Seion Calvinistic Chapel • e. Aberdulais British Legion • f. Cilfrew Primary School • g. Llangatwg Community School which has both a crèche and a community swimming pool • h. Dulais Rock Public House and Restaurant (currently being refurbished) • i. Aberdulais Iron Works Tea Shop • j. Bouchers Fish and Chips • k. Railway Tavern Public House and Restaurant • l. Rock and Fountain Public House and Restaurant <p>5. The site is within two minutes walk of the nearest bus stops which provides both a service to both the Neath, Brecon and Swansea Town Centres.</p> <p>6. Aberdulais is currently served by the NPTBCB mobile library service.</p> <p>7. There is a free community bus service to Cilfrew Post Office.</p> <p>8. The site can be served by mains drainage, electricity and gas.</p> <p>9. In summary the development of the land would constitute a rounding off of the settlement of Aberdulais which is already served by the community facilities and transport links referred to above.</p>
Dep823	Mr B Jones		787755	Object	Housing Sites	Policy H 1	<p>Camnant Road, Banwen (Site 2)</p> <p>Seeking allocation of new residential development site (see attached plan). Additional land is required within the settlement boundary of Banwen. Outline planning permission previously granted for residential development on this site (ref no. P2004/0857 refers). (See attached documentation, including sustainability appraisal)</p>
Dep824	Mr Dennis Harris		787756	Object	Housing Sites	Policy H 1	<p>Land to the rear of Greenwood Drive, Cimla</p> <p><u>Proposed use of the site</u></p> <p>This submission is to be considered by the LA planning department for inclusion in the LDP with a designation for housing. An assessment of the existing settlement boundary is requested with a view to including the area identified.</p> <p>The site is well located strategically with good transport links via public transport, nearby trunk road and M4 motorway network. It is requested that the area of land concerned be considered for housing and not green wedge as in the current UDP, as the site is logically located to provide necessary expansion to Cimla with the existing argument for retaining as green wedge should not be considered necessary to prevent the coalescence of settlements.</p> <p>The site forms a natural rounding off of the existing established settlement, development of the land would maximise use of the urban area linking the existing eastern school boundary with the residential area to the North.</p>

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							<p>The site is immediately available for development.</p> <p>Any loss of POS due to access infrastructure will be replaced within the candidate site.</p> <p>The preferred density of proposed housing in the NPT area is in excess of 30 units per hectare (refer to Appendix E- 7.5.22 Strategic Policy 6), which would suggest a capacity in excess of 60 units. With development of this size (over 50 units), the authorities preference would be the provision of more than one point of vehicular access onto the site, however this may be difficult given the surrounding built environment. Therefore the land owner will be pleased to enter into negotiation with the planning authority with regard the redesignation of a smaller area of land, a lower development density, or the relaxation of the single access arrangement.</p> <p>The proposed development will strive to assist the authority in its aim to provide more affordable housing (see Appendix H 7.5.25 Strategic Policy 7), by considering a mixed residential typology suitable for a variety of prospective purchasers. It will also assist in the provision of land to accommodate a proportion of the 240 units required for the Neath area (see Appendix J 7.4.4.2). We request that the authority give due consideration to the proposal and provide a coherent response. The application site is very similar in nature and location to the previously included Grove Road site.</p> <p>The land owner is open to discussion with regard the process of development. The parcel of land, in part or in its entirety, will provide an attractive development opportunity for a small / medium size developer. The land owner requests the authorities consideration of flexibility in terms of layout and density. If considered appropriate, the land owner will be willing to consider the inclusion of part of the land in the LDP to limit the number of units constructed, or preferably redesignation of the whole of the site.</p>
Dep832	Mr B Jones		787755	Object	Housing Sites	Policy H 1	<p>Cammant Road, Banwen Site 1</p> <p>Seeking allocation of new residential development site (see attached plan). Additional land is required within the settlement of Banwen. Outline planning permission previously granted for residential development on this site (ref no. P2004/0854 refers). (see attached documentation including sustainability appraisal).</p>
Dep840		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Housing Sites	Policy H 1	<p>Land to the North East, South East & South West of Coed Hirwaun (Site option 1)</p> <p>Preface</p> <p>This Annex sets out the detailed case in support of these representations. It provides both a critique of the current provisions of the plan, and suggested changes to its content. The representations are structured as follows:</p> <ul style="list-style-type: none"> • Summary of the overall position adopted - as an executive summary of the case being made • Consideration of housing supply by the Plan at the overall / plan-wide area • Consideration of the Spatial Options • An Assessment of the Port Talbot Spatial Strategy • Consideration of the Proposed Housing Allocations • An Assessment of the Suitability and Deliverability of Coed Hirwaun / Margam Village for Development • An Assessment of the Suitability and Deliverability of the Proposed Alternative Site • A Summary of the Suitability of Site for Development • Requested / recommended changes to the Plan <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given

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							<p>the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP.</p> <ul style="list-style-type: none"> • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for,

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							<p>including an increase in the contingency provision and a reduction in the provision for windfall sites.</p> <ul style="list-style-type: none"> o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Consideration of Housing Supply by the Plan</p> <p><i>Overall / Plan-Wide Housing Land Supply</i></p> <p>In terms of the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> • the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Deposit Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period • the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan (October 2012) which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); • the Authority has chosen not to use the "Moderate growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan (September 2011). This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. • the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1" data-bbox="1225 1266 2772 1596"> <thead> <tr> <th></th> <th>Date</th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008 Projections</td> <td>May 2010</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>October 2012</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>August 2013</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>September 2011</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A: Growth Options Summary</p> <p>As the above table confirms, whilst the dwelling requirement in the Deposit Plan is now higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and is well below the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows: <i>"The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for</i></p>		Date	Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008 Projections	May 2010	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	October 2012	8,227	548	Deposit LDP	August 2013	8,027	535	Pre-Deposit Moderate Growth Strategy	September 2011	6,279	419
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							<p><i>additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time." (Paragraph 7.0.8)</i></p> <p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2542 units), it is considered that there will be a significant shortfall in housing provision across the County over the plan period.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that:</p> <p><i>"Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them..."</i></p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following:</p> <p><i>"The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot." (Paragraph 5.0.7)</i></p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time and respond to the improving global and UK economic situation.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy of the Deposit LDP. In particular, the level of previous and historic development across the County does not necessarily correlate with the current and future level of development demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>Importantly, the Deposit Plan housing projections do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the recent economic downturn and recession. It is considered that a more stable economic situation which is now beginning to emerge will result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years will likely result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, this latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period and should not just be based on the short term historic situation (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority has not maintained a five year land supply since 2007. Whilst the 2011 and 2012 Assessments show a supply of 5.8 years and 6 years respectively, this is considered to be due to the method of calculation (i.e. based on previous completions) and is not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these</p>

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							<p>objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. The Deposit Plan strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement and does not provide the basic means of facilitating economic growth and stimulation that will be required over the plan period.</p> <p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings.</p> <p>This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Importantly, when compared with other emerging LDP's in Wales, it is clear that the allowance for 'uplift' is significantly underprovided.</p> <p>By way of evidencing this point, Torfaen County Borough Council's Deposit LDP (March 2011) provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council has considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. In particular, the adopted Pembrokeshire LDP (February 2013), provides for a total housing supply which is 28% higher than their assessed housing requirement for the period. The total Housing Supply for the County over the plan period therefore includes a contingency of circa 20% for permissions that are not implemented - and in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for an efficient and buoyant housing market". Within the Inspector's Report for the Pembrokeshire LDP (2013), the Inspector states the following in regards to the proposed housing supply:</p> <p><i>"The actual housing supply figure ... is some 30% higher than the housing requirement. ... In my view this level of over-supply is acceptable, having regard to the number of existing planning permissions that are unlikely to be implemented and the fact that some allocations will not be taken up, particularly if current market conditions continue well into the Plan period. In addition over-supply will assist in ensuring a 5 year housing land supply, gives a choice of sites to both developers and households in testing times and is likely to deliver more affordable housing. The PCNPA has also over-provided for housing in its LDP. ..."</i> (Paragraph 7.2)</p> <p>It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP. Such a contingency would provide the required policy context to facilitate growth and improve prosperity of the plan area.</p> <p>In terms of the Neath Port Talbot Deposit LDP housing contingency, it is noted the Council states the following within the Population and Housing Topic Paper (August 2013):</p> <p><i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for upto 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market.</i> (Paragraph 7.0.21)</p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, as discussed in further detail below, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of</p>

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							<p>completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market and meets future requirements by providing sufficient scope for new housing in the right locations that people will want to live.</p> <p><i>Windfall and Small Sites</i></p> <p>It is noted that 23% of Neath Port Talbot's total dwelling supply is comprised of potential development from windfall sites (2085 dwellings from small sites and windfall sites). This relates to approximately 139 dwellings per annum. Such a high reliance on windfall sites is considered to be inappropriate and unjustified, particularly in view of recent development rates on windfall sites.</p> <p>In particular, it is noted that within Neath Port Talbot's Population and Housing Topic Paper (2013), an average of 85 units per annum has been identified for large windfall development (on sites over 10 units) over the plan period, with an average of 54 dwellings per annum coming forward on small sites over the period for 2001/02 - 2011/2012. Within this average rate of 54 dwellings, this ranges significantly from 5 units per annum, to 130 units per annum. Accordingly, based on these trends, it is not considered that the housing provision on windfall and small sites will be developed anywhere near the level of 139 dwellings per annum anticipated and proposed in the Deposit plan calculations.</p> <p>Furthermore, it is not considered that the historic rate of windfall and small site developments will be able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years. This has, and will continue to, resulted in a smaller ever diminishing 'pool' of potential windfall and small sites being available. Therefore, as the levels of potential windfall and small sites significantly diminish, the rate of development on such sites is likely to slow dramatically, as such deliverable sites simply become less available.</p> <p>In addition, the LDP's provision for windfalls is heavily reliant on large sites (over 10 dwellings) coming forward, with 1,275 dwellings proposed on large windfall sites. It is considered likely that higher numbers of small windfalls sites will come forward in comparison to larger windfall sites which may prove more difficult to find as the 'pool' of sites reduces. Accordingly, the LDP's reliance on larger windfall sites needs to be reduced in view of the lower levels of larger sites that are likely to come forward within the Plan period.</p> <p>It is therefore considered that the LDP significantly overestimates the levels of dwellings expected to come forward on both windfall and small sites within the LDP. Such a situation is likely to result in an under provision in the total dwelling supply and will restrict the ability of the LDP to provide for the housing needs of the local population over the plan period. Accordingly, the provision for windfall and small sites within the total dwelling supply should be reduced, with a consequential identification of further suitable and deliverable sites for residential development.</p> <p><i>'Performance' of other LDP's Across Wales</i></p> <p>Evidence of the failure of adopted LDP's to actually yield and deliver the envisaged and required housing supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's LDP. This Plan, despite having been relatively recently adopted in March 2011, has failed to ensure an adequate supply of housing land for the County Borough since its adoption.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) which records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is -only 2 years 'old').</p> <p>The following extract from the 2012 RCT JHLAS is relevant:</p>

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							<p><i>"The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years"</i></p> <p>In terms of the 'cause' of this undersupply, the following extract is relevant:</p> <p><i>"This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone"</i></p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites. Many of these have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites to ensure that there is a ready supply of deliverable housing land to meet forecast demand requirements.</p> <p>In any event, the persistent <i>"difficult economic conditions"</i> recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p> <p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered - a position which has been endorsed by Members at Caerphilly's Cabinet Meeting on 2nd October 2013 and Council Meeting on 8th October 2013. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area, and will also potentially increase the delivery of affordable housing.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, including suitable and deliverable greenfield sites (as discussed further below), should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded. This will ensure that the NPT LDP will be a robust plan that can meet the housing demands of the area and stimulate economic growth and prosperity.</p> <p><i>Assessment of the Spatial Options</i></p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. In doing so, the strategy:</p> <p><i>"...focuses on the Coastal Corridor and Valley areas within a different context to reflect their varying potential to accommodate new development."</i> (Deposit LDP paragraph 2.5.7).</p> <p>In doing so, the Deposit Plan acknowledges that the 'majority of investment will continue to be along the M4 corridor'. This strategy is broadly supported, as it recognises the need to achieve a balance in terms of housing provision, and in particular to focus new development in the M4 corridor, whilst at the same time ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p> <p>It is also noted that a mixture of brownfield and greenfield sites will make up the housing supply, as confirmed within the Deposit Plan as follows:</p> <p><i>"The housing supply within Neath and Port Talbot will be made up of brownfield re-development, greenfield sites and existing commitments, with the regeneration of brownfield land being balanced against the release of greenfield areas. In releasing sites for development, the strategy provides sufficient and viable housing sites that seek to maximise the potential to achieve affordable housing."</i> (Deposit LDP,</p>

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							<p>paragraph 2.5.22)</p> <p>Support is given to the Plan's recognition that both brownfield and greenfield sites have a role to play in providing a range of sites and choices that can provide for the Council's housing supply. However, it should be noted that an appropriate balance between the two is required, in order to ensure that sites are brought forward for development. In particular, brownfield sites generally have greater site constraints and can often be associated with significant remediation costs. This can have significant impacts on the viability and deliverability of developments, and can lead to a significant reduction in the ability of the site to contribute towards planning obligations such as affordable housing etc.</p> <p>Accordingly, in order to balance this, a greater range of greenfield sites should be allocated within the Plan in order to ensure the deliverability of sites, and also to provide greater likelihood for developer contributions - particularly for the provision of affordable housing. An appropriate balance between brownfield and greenfield site allocations therefore needs to be provided, with consideration given to allocating additional greenfield sites in order to meet the overall shortfall and to aid delivery of housing development.</p> <p>Assessment of Port Talbot Spatial Strategy</p> <p>Within the Deposit LDP, it is noted that 27.2% (2460 dwellings) of the total housing requirement is directed to Port Talbot. General support is given to this 'weighting' of housing numbers, as it recognises the importance of the Port Talbot area as an area where growth should be focussed. It is however observed that the 48.4% allocated to the Neath spatial area is significantly higher than Port Talbot. We consider that a more equitable split would be appropriate.</p> <p>Furthermore, it is noted that the Deposit LDP directs a lower proportion of housing numbers to the Port Talbot area in comparison to the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012). In particular, within the Stakeholder Proposals Report (October 2012), 32.9% of the total housing requirements were directed to the Port Talbot area, which represented a total of 2918 dwellings. The current Deposit Plan therefore directs over 450 less dwellings to the Port Talbot area than the previous version of the Plan.</p> <p>This reduction in the proposed housing provision for Port Talbot is considered to represent a material difference, which is likely to result in the housing needs of the Port Talbot area going unmet over the plan period. Accordingly, an increase in the housing numbers directed to Port Talbot is required in order to ensure that the Plan adequately provides for the needs and requirements of the spatial area - a spatial area</p> <p>In terms of the housing supply for Port Talbot, it is noted that this is comprised of the existing landbank, new allocations, small sites and a windfall allowance. It is noted that unlike the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012), a percentage of the Coed Darcy development has not been allocated directly towards Port Talbot's housing supply. However, the 322 units from Coed Darcy which were previously allocated towards the Port Talbot Housing Supply have in effect been removed from Port Talbot's housing supply altogether and placed into Neath's housing supply - which partly explains the reduction in the percentage of units provided for within the Port Talbot spatial area when considered against the previous Deposit Plan Proposals Report (October 2012).</p> <p>Whilst support would be given to the removal of an apportionment of the Coed Darcy development from Port Talbot's housing figures, the Deposit LDP has, in effect, not done this, as there has been no resulting increase in other allocations within the Port Talbot area. Accordingly, it is apparent that the Deposit LDP still considers that Coed Darcy will provide for a significant proportion of Port Talbot's housing requirements. This is confirmed within the Population and Housing Topic Paper (August 2013), which states the following:</p> <p><i>"The Strategic Regeneration Areas (SRA) located at Coed Darcy, Neath and Harbourside, Port Talbot will by virtue of their scale and location, particularly in the case of the former, help to meet the future housing needs of the County Borough as a whole. The impact the SRA sites will extend beyond their immediate areas and spatial area boundaries."</i> (Paragraph 9.5.10)</p> <p>It is considered that this share of the Coed Darcy allocation should not form any part of the Port Talbot housing figures, and that there is the potential that due to this, the Port Talbot Spatial area will be underprovided for in terms of housing provision over the Plan period. In particular, it is considered that it is more likely that Coed Darcy will absorb a proportion of Swansea's housing requirements over the Plan period, due to the close transport links between Swansea and the development site, and the major developments which are likely to come forward to the east of Swansea and close to Fabian Way, which will further shift the focus towards the eastern edge of Swansea. It is</p>

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							<p>therefore considered that Port Talbot will suffer from a shortfall of housing provision over the Plan period.</p> <p>In addition, it should be noted that the LDP, as a whole, overestimates the number of houses that will be provided on Coed Darcy over the Plan period. In particular, over the Plan period (i.e. 2011 - 2026) the Deposit LDP confirms that a total of 2150 dwellings will be brought forward on Coed Darcy - this is considered to be a significant overestimation of the level of development which will take place on the site.</p> <p>It is estimated that Coed Darcy, at its height, will have a build rate of 120 - 150 dwellings (maximum) per year (regardless of the number of house builders). However, it will take 3 / 4 years to reach that level of output. It is likely that there will be very few completions on Coed Darcy in 2013, with completions generally only from 2014 onwards. Therefore, it is likely that there will be only 12 full years of house building over the Plan period (i.e. 2014 - 2026).</p> <p>Accordingly, as a best case scenario, and based on maximum annual build rates (i.e. 150 units per year), Coed Darcy will generate only 1800 dwellings over the Plan period. A more likely scenario, is that the development will generate 120 units per annum, which equates to 1440 dwellings over the Plan period. Accordingly, whilst the allocation of 1828 dwellings for Coed Darcy within Neath may potentially be considered to be appropriate, the allocation of 322 dwellings for Port Talbot is an over-allocation, which in practice, will not be delivered over the Plan period. It should also be noted that the estimation of Coed Darcy providing 1800 dwellings over the Plan period is optimistic in itself, and should therefore be considered as the maximum, rather than a minimum or average supply.</p> <p>This likely lower delivery rate at Coed Darcy is considered to be more a product and result of the site itself - known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. It is expected that house builders will be prepared to run, and will indeed demand, a range and choice of sites throughout the county borough to meet their needs. The Coed Darcy development / site has a unique and particular character and concept that will serve only part of the housing market in the County Borough. Coed Darcy is located on the western extremity of the Plan area and firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment'. This makes a compelling case for the allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on (and indeed exposed to the performance of) one particular scheme, within one particular geographic location.</p> <p>The Coed Darcy element of the Deposit Plan's housing numbers should therefore be reduced in order to accurately reflect the level of development which is likely to come forward over the Plan period. In addition, additional sites should be allocated within the Port Talbot spatial area to ensure that there is no housing shortfall over the Plan period and that Port Talbot's needs are met by its own sites and allocations.</p> <p>Furthermore, it is considered that the balance between brownfield and greenfield allocations within the LDP, and within the Port Talbot Spatial area is too heavily weighted towards brownfield sites. An over reliance on brownfield sites will not offer the greatest choice to residents, as it provides only very limited options for housing development - the range and choice of sites being very similar in location and character.</p> <p>In addition, it is considered that the potential for developer contributions on brownfield sites would be much lower than those likely on greenfield sites, as there is more likelihood on previously developed land for additional development costs, due to site constraints etc. Such a situation results in lower development margins and less opportunity for developer contributions due to scheme viability etc. In this regard, greenfield sites would provide a relatively straight forward form of development, with less unknown costs, and therefore a greater likelihood for developer contributions. It is therefore considered that an increase in greenfield sites within the plan will ensure that the proposed contribution levels are better achieved.</p> <p>Likewise, site constraints on brownfield sites can often lead to delays in developments coming forward, which could have a significant impact on the ability of the Plan to provide and deliver the required housing levels. Greenfield sites however are generally less constrained and can often provide for development earlier in the Plan period. Additional greenfield allocations are therefore required in order to ensure that there is an appropriate balance between brownfield and greenfield and to ensure that the Plan is able to deliver the required housing provision.</p> <p>In this regard, Integrel Geotechnique have undertaken a review (on behalf of the Homes Builders Federation) of the typical abnormal development costs for brownfield sites in South Wales, which is enclosed at Appendix 1. They estimate that the total cost of remediation /</p>

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							<p>reclamation works and abnormal associated with the redevelopment of brownfield sites for housing would be between circa £175,000 and £325,000 per acre.</p> <p>These additional remediation works therefore represent significant abnormal costs which could impact on the viability and deliverability of brownfield sites, in addition to reducing the ability of sites to provide financial contributions and affordable housing. A reliance of brownfield sites will therefore likely lead to a slower rate of delivery of units - something which has been found within Caerphilly CBC, who are requiring to undertake a review of their brownfield- focussed LDP only 3 years after its adoption (as discussed in further detail above).</p> <p>Greenfield sites, which have less site constraints and therefore less associated abnormal and development costs, therefore provide more straight forward, deliverable and viable development sites. An appropriate balance if greenfield and brownfield sites are required to be provided to ensure that site's do come forward for development across the plan period to provide for assessed housing needs.</p> <p>Proposed Housing Allocations</p> <p>Within Policy H1 Housing Allocations, the Deposit Plan has proposed a number of residential allocations across the plan area which the Council consider are capable of providing the Plan's housing supply.</p> <p>It is considered that a number of the proposed sites are likely undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units within Neath Port Talbot over the plan period.</p> <p>In order to demonstrate this, a comprehensive account and critique of all sites that have been put forward for inclusion within the Deposit LDP and that fall within a core market search area (defined with reference to the plan enclosed at Appendix 2) has been undertaken. This core market search area, despite being defined with reference to market 'appeal' still covers a predominant part of the Plan area, and moreover and more importantly, contains the majority of the housing allocations (those falling within the main settlements / core part of the Plan area).</p> <p>These schedules (one relating to the Neath and Pontardawe Housing strategy areas and the other to Port Talbot) have been compiled in order to provide an objective assessment of the deliverability of the housing land supply position put forward by the Deposit Plan. Both of these schedules are provided within Appendix 3 to this annex.</p> <p>As the schedules outline, there are a number of constraints on a number of the sites proposed for allocation within the Deposit Plan, which reduces the potential of these sites to contribute towards housing provision over the Plan period. Indeed, it is considered that a number of these sites will prove to be undeliverable over the Plan period, leaving the area at risk of being under-provided for in housing needs terms.</p> <p>As can be seen and noted, based on identified site constraints, we have estimated a maximum and minimum site yield for all of the sites. In summary, therefore the review confirms the following:</p> <ul style="list-style-type: none"> • For the Port Talbot Spatial Area, the LDP identifies that the sites will yield a total of 1960 units. • Having regard to relevant site constraints, we estimate that the sites in Port Talbot will yield between a maximum of 1769 units and a minimum of 1395 units. • In the Port Talbot Spatial Area there is therefore considered to be a shortfall of between 191 and 565 units. • For the Neath and Pontardawe Spatial Areas, the LDP identifies that the sites will yield a total of 4149 units. • Having regard to relevant site constraints, we estimate that the sites in Neath and Pontardawe will yield between a maximum of 3586 units and a minimum of 3091 units. • In the Neath and Pontardawe Spatial Area there is therefore considered to be a shortfall of between 563 and 1058 units. • Across the Authority, we therefore estimate that there is a shortfall of between 754 and 1623 units. <p>For clarity, the above is summarised within the table below:</p>

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT																														
							<table border="1"> <thead> <tr> <th></th> <th>LDP Site Yield</th> <th colspan="2">Our Estimated Site Yield</th> <th colspan="2">Estimated Shortfall</th> </tr> <tr> <th></th> <th></th> <th>Minimum</th> <th>Maximum</th> <th>Minimum</th> <th>Maximum</th> </tr> </thead> <tbody> <tr> <td>Port Talbot Spatial Area</td> <td>1960</td> <td>1395</td> <td>1769</td> <td>191</td> <td>565</td> </tr> <tr> <td>Neath & Pontardawe Spatial Areas</td> <td>4149</td> <td>3091</td> <td>3586</td> <td>563</td> <td>1058</td> </tr> <tr> <td>TOTAL:</td> <td>6109</td> <td>4486</td> <td>5355</td> <td>754</td> <td>1623</td> </tr> </tbody> </table> <p>The enclosed schedules (see Appendix 3) therefore clearly raise considerable questions over the deliverability of many individual sites, and by association, the cumulative numbers / supply envisaged by the Deposit Plan. Accordingly, it is considered that there is a clear need to allocate additional deliverable sites in order to ensure that the Plan is able to provide the required level of housing provision.</p> <p>It is therefore considered that a wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period.</p> <p>The proposed sites located at Coed Hirwaun are considered to provide for such delivery. The sites represent a suitable, appropriate and deliverable option for development within the Port Talbot spatial area which will ensure that the area is adequately provided for in terms of adequate housing provision over the Plan period. The suitability of the Coed Hirwaun / Margam Village opportunity that is being presented as an Alternative Site is discussed further below.</p> <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff). In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential</p>		LDP Site Yield	Our Estimated Site Yield		Estimated Shortfall				Minimum	Maximum	Minimum	Maximum	Port Talbot Spatial Area	1960	1395	1769	191	565	Neath & Pontardawe Spatial Areas	4149	3091	3586	563	1058	TOTAL:	6109	4486	5355	754	1623
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							<p>development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p> <p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>The proposed Development Framework Plan for Option 1 (see Appendix 5) proposes an indicative development of approximately 490 dwellings, and is the preferred alternative site. The level of development proposed has been defined in consideration of the landscape setting, as well as seeking to ensure that sufficient numbers are present to support a wider variety of community and other facilities.</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are</p>

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							<p>acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the</p>

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							<p>proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have 'no adverse impact on the features and characteristics for which the SLA has been designated' and it would not undermine the purpose and 'integrity of the green wedge'.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p> <p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has</p>

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							<p>been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p> <p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor</p>

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							<p>health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates. <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p>

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							<p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs.

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							<p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings. <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep843		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Housing Sites	Policy H 1	<p>Land to the North East of Coed Hirwaun (Site option 2)</p> <p>Preface</p> <p>This Annex sets out the detailed case in support of these representations. It provides both a critique of the current provisions of the plan, and suggested changes to its content. The representations are structured as follows:</p> <ul style="list-style-type: none"> • Summary of the overall position adopted - as an executive summary of the case being made • Consideration of housing supply by the Plan at the overall / plan-wide area • Consideration of the Spatial Options • An Assessment of the Port Talbot Spatial Strategy • Consideration of the Proposed Housing Allocations • An Assessment of the Suitability and Deliverability of Coed Hirwaun / Margam Village for Development • An Assessment of the Suitability and Deliverability of the Proposed Alternative Site • A Summary of the Suitability of Site for Development • Requested / recommended changes to the Plan <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP.

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							<ul style="list-style-type: none"> • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative

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							<p>site.</p> <ul style="list-style-type: none"> o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Consideration of Housing Supply by the Plan</p> <p><i>Overall / Plan-Wide Housing Land Supply</i></p> <p>In terms of the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> • the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Deposit Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. • the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan (October 2012) which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); • the Authority has chosen not to use the "Moderate growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan (September 2011). This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. • the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1"> <thead> <tr> <th></th> <th>Date</th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008 Projections</td> <td>May 2010</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>October 2012</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>August 2013</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>September 2011</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A: Growth Options Summary</p> <p>As the above table confirms, whilst the dwelling requirement in the Deposit Plan is now higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and is well below the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows: <i>"The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time."</i> (Paragraph 7.0.8)</p>		Date	Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008 Projections	May 2010	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	October 2012	8,227	548	Deposit LDP	August 2013	8,027	535	Pre-Deposit Moderate Growth Strategy	September 2011	6,279	419
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							<p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2542 units), it is considered that there will be a significant shortfall in housing provision across the County over the plan period.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that:</p> <p><i>"Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them..."</i></p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following:</p> <p><i>"The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot."</i> (Paragraph 5.0.7)</p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time and respond to the improving global and UK economic situation.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy of the Deposit LDP. In particular, the level of previous and historic development across the County does not necessarily correlate with the current and future level of development demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>Importantly, the Deposit Plan housing projections do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the recent economic downturn and recession. It is considered that a more stable economic situation which is now beginning to emerge will result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years will likely result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, this latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period and should not just be based on the short term historic situation (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority has not maintained a five year land supply since 2007. Whilst the 2011 and 2012 Assessments show a supply of 5.8 years and 6 years respectively, this is considered to be due to the method of calculation (i.e. based on previous completions) and is not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach</p>

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							<p>which is inconsistent with the drive to re-stimulate the housing market as a result. The Deposit Plan strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement and does not provide the basic means of facilitating economic growth and stimulation that will be required over the plan period.</p> <p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings.</p> <p>This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Importantly, when compared with other emerging LDP's in Wales, it is clear that the allowance for 'uplift' is significantly underprovided.</p> <p>By way of evidencing this point, Torfaen County Borough Council's Deposit LDP (March 2011) provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council has considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. In particular, the adopted Pembrokeshire LDP (February 2013), provides for a total housing supply which is 28% higher than their assessed housing requirement for the period. The total Housing Supply for the County over the plan period therefore includes a contingency of circa 20% for permissions that are not implemented - and in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for an efficient and buoyant housing market". Within the Inspector's Report for the Pembrokeshire LDP (2013), the Inspector states the following in regards to the proposed housing supply:</p> <p><i>"The actual housing supply figure ... is some 30% higher than the housing requirement. ... In my view this level of over-supply is acceptable, having regard to the number of existing planning permissions that are unlikely to be implemented and the fact that some allocations will not be taken up, particularly if current market conditions continue well into the Plan period. In addition over-supply will assist in ensuring a 5 year housing land supply, gives a choice of sites to both developers and households in testing times and is likely to deliver more affordable housing. The PCNPA has also over-provided for housing in its LDP. ..."</i> (Paragraph 7.2)</p> <p>It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP. Such a contingency would provide the required policy context to facilitate growth and improve prosperity of the plan area.</p> <p>In terms of the Neath Port Talbot Deposit LDP housing contingency, it is noted the Council states the following within the Population and Housing Topic Paper (August 2013):</p> <p><i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for upto 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market.</i> (Paragraph 7.0.21)</p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, as discussed in further detail below, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p>

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							<p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market and meets future requirements by providing sufficient scope for new housing in the right locations that people will want to live.</p> <p><i>Windfall and Small Sites</i></p> <p>It is noted that 23% of Neath Port Talbot's total dwelling supply is comprised of potential development from windfall sites (2085 dwellings from small sites and windfall sites). This relates to approximately 139 dwellings per annum. Such a high reliance on windfall sites is considered to be inappropriate and unjustified, particularly in view of recent development rates on windfall sites.</p> <p>In particular, it is noted that within Neath Port Talbot's Population and Housing Topic Paper (2013), an average of 85 units per annum has been identified for large windfall development (on sites over 10 units) over the plan period, with an average of 54 dwellings per annum coming forward on small sites over the period for 2001/02 - 2011/2012. Within this average rate of 54 dwellings, this ranges significantly from 5 units per annum, to 130 units per annum. Accordingly, based on these trends, it is not considered that the housing provision on windfall and small sites will be developed anywhere near the level of 139 dwellings per annum anticipated and proposed in the Deposit plan calculations.</p> <p>Furthermore, it is not considered that the historic rate of windfall and small site developments will be able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years. This has, and will continue to, resulted in a smaller ever diminishing 'pool' of potential windfall and small sites being available. Therefore, as the levels of potential windfall and small sites significantly diminish, the rate of development on such sites is likely to slow dramatically, as such deliverable sites simply become less available.</p> <p>In addition, the LDP's provision for windfalls is heavily reliant on large sites (over 10 dwellings) coming forward, with 1,275 dwellings proposed on large windfall sites. It is considered likely that higher numbers of small windfalls sites will come forward in comparison to larger windfall sites which may prove more difficult to find as the 'pool' of sites reduces. Accordingly, the LDP's reliance on larger windfall sites needs to be reduced in view of the lower levels of larger sites that are likely to come forward within the Plan period.</p> <p>It is therefore considered that the LDP significantly overestimates the levels of dwellings expected to come forward on both windfall and small sites within the LDP. Such a situation is likely to result in an under provision in the total dwelling supply and will restrict the ability of the LDP to provide for the housing needs of the local population over the plan period. Accordingly, the provision for windfall and small sites within the total dwelling supply should be reduced, with a consequential identification of further suitable and deliverable sites for residential development.</p> <p><i>'Performance' of other LDP's Across Wales</i></p> <p>Evidence of the failure of adopted LDP's to actually yield and deliver the envisaged and required housing supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's LDP. This Plan, despite having been relatively recently adopted in March 2011, has failed to ensure an adequate supply of housing land for the County Borough since its adoption.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) which records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is -only 2 years 'old').</p> <p>The following extract from the 2012 RCT JHLAS is relevant:</p> <p><i>"The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years"</i></p>

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							<p>In terms of the 'cause' of this undersupply, the following extract is relevant:</p> <p><i>"This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone"</i></p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites. Many of these have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites to ensure that there is a ready supply of deliverable housing land to meet forecast demand requirements.</p> <p>In any event, the persistent <i>"difficult economic conditions"</i> recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p> <p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered - a position which has been endorsed by Members at Caerphilly's Cabinet Meeting on 2nd October 2013 and Council Meeting on 8th October 2013. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area, and will also potentially increase the delivery of affordable housing.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, including suitable and deliverable greenfield sites (as discussed further below), should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded. This will ensure that the NPT LDP will be a robust plan that can meet the housing demands of the area and stimulate economic growth and prosperity.</p> <p>Assessment of the Spatial Options</p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. In doing so, the strategy:</p> <p><i>"...focuses on the Coastal Corridor and Valley areas within a different context to reflect their varying potential to accommodate new development."</i> (Deposit LDP paragraph 2.5.7).</p> <p>In doing so, the Deposit Plan acknowledges that the 'majority of investment will continue to be along the M4 corridor'. This strategy is broadly supported, as it recognises the need to achieve a balance in terms of housing provision, and in particular to focus new development in the M4 corridor, whilst at the same time ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p> <p>It is also noted that a mixture of brownfield and greenfield sites will make up the housing supply, as confirmed within the Deposit Plan as follows:</p> <p><i>"The housing supply within Neath and Port Talbot will be made up of brownfield re-development, greenfield sites and existing commitments, with the regeneration of brownfield land being balanced against the release of greenfield areas. In releasing sites for development, the strategy provides sufficient and viable housing sites that seek to maximise the potential to achieve affordable housing."</i> (Deposit LDP, paragraph 2.5.22)</p> <p>Support is given to the Plan's recognition that both brownfield and greenfield sites have a role to play in providing a range of sites and</p>

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							<p>choices that can provide for the Council's housing supply. However, it should be noted that an appropriate balance between the two is required, in order to ensure that sites are brought forward for development. In particular, brownfield sites generally have greater site constraints and can often be associated with significant remediation costs. This can have significant impacts on the viability and deliverability of developments, and can lead to a significant reduction in the ability of the site to contribute towards planning obligations such as affordable housing etc.</p> <p>Accordingly, in order to balance this, a greater range of greenfield sites should be allocated within the Plan in order to ensure the deliverability of sites, and also to provide greater likelihood for developer contributions - particularly for the provision of affordable housing. An appropriate balance between brownfield and greenfield site allocations therefore needs to be provided, with consideration given to allocating additional greenfield sites in order to meet the overall shortfall and to aid delivery of housing development.</p> <p>Assessment of Port Talbot Spatial Strategy</p> <p>Within the Deposit LDP, it is noted that 27.2% (2460 dwellings) of the total housing requirement is directed to Port Talbot. General support is given to this 'weighting' of housing numbers, as it recognises the importance of the Port Talbot area as an area where growth should be focussed. It is however observed that the 48.4% allocated to the Neath spatial area is significantly higher than Port Talbot. We consider that a more equitable split would be appropriate.</p> <p>Furthermore, it is noted that the Deposit LDP directs a lower proportion of housing numbers to the Port Talbot area in comparison to the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012). In particular, within the Stakeholder Proposals Report (October 2012), 32.9% of the total housing requirements were directed to the Port Talbot area, which represented a total of 2918 dwellings. The current Deposit Plan therefore directs over 450 less dwellings to the Port Talbot area than the previous version of the Plan.</p> <p>This reduction in the proposed housing provision for Port Talbot is considered to represent a material difference, which is likely to result in the housing needs of the Port Talbot area going unmet over the plan period. Accordingly, an increase in the housing numbers directed to Port Talbot is required in order to ensure that the Plan adequately provides for the needs and requirements of the spatial area - a spatial area</p> <p>In terms of the housing supply for Port Talbot, it is noted that this is comprised of the existing landbank, new allocations, small sites and a windfall allowance. It is noted that unlike the previous Stakeholder Engagement Deposit Plan Proposals Report (October 2012), a percentage of the Coed Darcy development has not been allocated directly towards Port Talbot's housing supply. However, the 322 units from Coed Darcy which were previously allocated towards the Port Talbot Housing Supply have in effect been removed from Port Talbot's housing supply altogether and placed into Neath's housing supply - which partly explains the reduction in the percentage of units provided for within the Port Talbot spatial area when considered against the previous Deposit Plan Proposals Report (October 2012).</p> <p>Whilst support would be given to the removal of an apportionment of the Coed Darcy development from Port Talbot's housing figures, the Deposit LDP has, in effect, not done this, as there has been no resulting increase in other allocations within the Port Talbot area. Accordingly, it is apparent that the Deposit LDP still considers that Coed Darcy will provide for a significant proportion of Port Talbot's housing requirements. This is confirmed within the Population and Housing Topic Paper (August 2013), which states the following:</p> <p><i>"The Strategic Regeneration Areas (SRA) located at Coed Darcy, Neath and Harbourside, Port Talbot will by virtue of their scale and location, particularly in the case of the former, help to meet the future housing needs of the County Borough as a whole. The impact the SRA sites will extend beyond their immediate areas and spatial area boundaries."</i> (Paragraph 9.5.10)</p> <p>It is considered that this share of the Coed Darcy allocation should not form any part of the Port Talbot housing figures, and that there is the potential that due to this, the Port Talbot Spatial area will be underprovided for in terms of housing provision over the Plan period. In particular, it is considered that it is more likely that Coed Darcy will absorb a proportion of Swansea's housing requirements over the Plan period, due to the close transport links between Swansea and the development site, and the major developments which are likely to come forward to the east of Swansea and close to Fabian Way, which will further shift the focus towards the eastern edge of Swansea. It is therefore considered that Port Talbot will suffer from a shortfall of housing provision over the Plan period.</p> <p>In addition, it should be noted that the LDP, as a whole, overestimates the number of houses that will be provided on Coed Darcy over the</p>

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							<p>Plan period. In particular, over the Plan period (i.e. 2011 - 2026) the Deposit LDP confirms that a total of 2150 dwellings will be brought forward on Coed Darcy - this is considered to be a significant overestimation of the level of development which will take place on the site.</p> <p>It is estimated that Coed Darcy, at its height, will have a build rate of 120 - 150 dwellings (maximum) per year (regardless of the number of house builders). However, it will take 3 / 4 years to reach that level of output. It is likely that there will be very few completions on Coed Darcy in 2013, with completions generally only from 2014 onwards. Therefore, it is likely that there will be only 12 full years of house building over the Plan period (i.e. 2014 - 2026).</p> <p>Accordingly, as a best case scenario, and based on maximum annual build rates (i.e. 150 units per year), Coed Darcy will generate only 1800 dwellings over the Plan period. A more likely scenario, is that the development will generate 120 units per annum, which equates to 1440 dwellings over the Plan period. Accordingly, whilst the allocation of 1828 dwellings for Coed Darcy within Neath may potentially be considered to be appropriate, the allocation of 322 dwellings for Port Talbot is an over-allocation, which in practice, will not be delivered over the Plan period. It should also be noted that the estimation of Coed Darcy providing 1800 dwellings over the Plan period is optimistic in itself, and should therefore be considered as the maximum, rather than a minimum or average supply.</p> <p>This likely lower delivery rate at Coed Darcy is considered to be more a product and result of the site itself - known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. It is expected that house builders will be prepared to run, and will indeed demand, a range and choice of sites throughout the county borough to meet their needs. The Coed Darcy development / site has a unique and particular character and concept that will serve only part of the housing market in the County Borough. Coed Darcy is located on the western extremity of the Plan area and firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment'. This makes a compelling case for the allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on (and indeed exposed to the performance of) one particular scheme, within one particular geographic location.</p> <p>The Coed Darcy element of the Deposit Plan's housing numbers should therefore be reduced in order to accurately reflect the level of development which is likely to come forward over the Plan period. In addition, additional sites should be allocated within the Port Talbot spatial area to ensure that there is no housing shortfall over the Plan period and that Port Talbot's needs are met by its own sites and allocations.</p> <p>Furthermore, it is considered that the balance between brownfield and greenfield allocations within the LDP, and within the Port Talbot Spatial area is too heavily weighted towards brownfield sites. An over reliance on brownfield sites will not offer the greatest choice to residents, as it provides only very limited options for housing development - the range and choice of sites being very similar in location and character.</p> <p>In addition, it is considered that the potential for developer contributions on brownfield sites would be much lower than those likely on greenfield sites, as there is more likelihood on previously developed land for additional development costs, due to site constraints etc. Such a situation results in lower development margins and less opportunity for developer contributions due to scheme viability etc. In this regard, greenfield sites would provide a relatively straight forward form of development, with less unknown costs, and therefore a greater likelihood for developer contributions. It is therefore considered that an increase in greenfield sites within the plan will ensure that the proposed contribution levels are better achieved.</p> <p>Likewise, site constraints on brownfield sites can often lead to delays in developments coming forward, which could have a significant impact on the ability of the Plan to provide and deliver the required housing levels. Greenfield sites however are generally less constrained and can often provide for development earlier in the Plan period. Additional greenfield allocations are therefore required in order to ensure that there is an appropriate balance between brownfield and greenfield and to ensure that the Plan is able to deliver the required housing provision.</p> <p>In this regard, Integrel Geotechnique have undertaken a review (on behalf of the Homes Builders Federation) of the typical abnormal development costs for brownfield sites in South Wales, which is enclosed at Appendix 1. They estimate that the total cost of remediation / reclamation works and abnormal associated with the redevelopment of brownfield sites for housing would be between circa £175,000 and £325,000 per acre.</p>

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							<p>These additional remediation works therefore represent significant abnormal costs which could impact on the viability and deliverability of brownfield sites, in addition to reducing the ability of sites to provide financial contributions and affordable housing. A reliance of brownfield sites will therefore likely lead to a slower rate of delivery of units - something which has been found within Caerphilly CBC, who are requiring to undertake a review of their brownfield- focussed LDP only 3 years after its adoption (as discussed in further detail above).</p> <p>Greenfield sites, which have less site constraints and therefore less associated abnormal and development costs, therefore provide more straight forward, deliverable and viable development sites. An appropriate balance if greenfield and brownfield sites are required to be provided to ensure that site's do come forward for development across the plan period to provide for assessed housing needs.</p> <p>Proposed Housing Allocations</p> <p>Within Policy H1 Housing Allocations, the Deposit Plan has proposed a number of residential allocations across the plan area which the Council consider are capable of providing the Plan's housing supply.</p> <p>It is considered that a number of the proposed sites are likely undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units within Neath Port Talbot over the plan period.</p> <p>In order to demonstrate this, a comprehensive account and critique of all sites that have been put forward for inclusion within the Deposit LDP and that fall within a core market search area (defined with reference to the plan enclosed at Appendix 2) has been undertaken. This core market search area, despite being defined with reference to market 'appeal' still covers a predominant part of the Plan area, and moreover and more importantly, contains the majority of the housing allocations (those falling within the main settlements / core part of the Plan area).</p> <p>These schedules (one relating to the Neath and Pontardawe Housing strategy areas and the other to Port Talbot) have been compiled in order to provide an objective assessment of the deliverability of the housing land supply position put forward by the Deposit Plan. Both of these schedules are provided within Appendix 3 to this annex.</p> <p>As the schedules outline, there are a number of constraints on a number of the sites proposed for allocation within the Deposit Plan, which reduces the potential of these sites to contribute towards housing provision over the Plan period. Indeed, it is considered that a number of these sites will prove to be undeliverable over the Plan period, leaving the area at risk of being under-provided for in housing needs terms.</p> <p>As can be seen and noted, based on identified site constraints, we have estimated a maximum and minimum site yield for all of the sites. In summary, therefore the review confirms the following:</p> <ul style="list-style-type: none"> • For the Port Talbot Spatial Area, the LDP identifies that the sites will yield a total of 1960 units. • Having regard to relevant site constraints, we estimate that the sites in Port Talbot will yield between a maximum of 1769 units and a minimum of 1395 units. • In the Port Talbot Spatial Area there is therefore considered to be a shortfall of between 191 and 565 units. • For the Neath and Pontardawe Spatial Areas, the LDP identifies that the sites will yield a total of 4149 units. • Having regard to relevant site constraints, we estimate that the sites in Neath and Pontardawe will yield between a maximum of 3586 units and a minimum of 3091 units. • In the Neath and Pontardawe Spatial Area there is therefore considered to be a shortfall of between 563 and 1058 units. • Across the Authority, we therefore estimate that there is a shortfall of between 754 and 1623 units. <p>For clarity, the above is summarised within the table below:</p> <table border="1" data-bbox="1222 1738 2398 1837"> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td>LDP Site Yield</td> <td>Our Estimated Site Yield</td> <td>Estimated Shortfall</td> </tr> </table>						LDP Site Yield	Our Estimated Site Yield	Estimated Shortfall
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							<table border="1"> <thead> <tr> <th></th> <th></th> <th>Minimum</th> <th>Maximum</th> <th>Minimum</th> <th>Maximum</th> </tr> </thead> <tbody> <tr> <td>Port Talbot Spatial Area</td> <td>1960</td> <td>1395</td> <td>1769</td> <td>191</td> <td>565</td> </tr> <tr> <td>Neath & Pontardawe Spatial Areas</td> <td>4149</td> <td>3091</td> <td>3586</td> <td>563</td> <td>1058</td> </tr> <tr> <td>TOTAL:</td> <td>6109</td> <td>4486</td> <td>5355</td> <td>754</td> <td>1623</td> </tr> </tbody> </table> <p>The enclosed schedules (see Appendix 3) therefore clearly raise considerable questions over the deliverability of many individual sites, and by association, the cumulative numbers / supply envisaged by the Deposit Plan. Accordingly, it is considered that there is a clear need to allocate additional deliverable sites in order to ensure that the Plan is able to provide the required level of housing provision.</p> <p>It is therefore considered that a wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period.</p> <p>The proposed sites located at Coed Hirwaun are considered to provide for such delivery. The sites represent a suitable, appropriate and deliverable option for development within the Port Talbot spatial area which will ensure that the area is adequately provided for in terms of adequate housing provision over the Plan period. The suitability of the Coed Hirwaun / Margam Village opportunity that is being presented as an Alternative Site is discussed further below.</p> <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff). In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p>			Minimum	Maximum	Minimum	Maximum	Port Talbot Spatial Area	1960	1395	1769	191	565	Neath & Pontardawe Spatial Areas	4149	3091	3586	563	1058	TOTAL:	6109	4486	5355	754	1623
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							<p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>As an alternative, secondary option, the proposed Development Framework Plan for Option 2 (see Appendix 6) proposes an indicative development of approximately 300 dwellings. This site area could also be considered as the first phase of the wider development site (i.e. Option 1).</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to</p>

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							<p>minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report</p>

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							<p>therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have 'no adverse impact on the features and characteristics for which the SLA has been designated' and it would not undermine the purpose and 'integrity of the green wedge'.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p> <p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of</p>

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							<p>development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p> <p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework;

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							<p>2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments;</p> <p>3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough;</p> <p>4. Accessibility within and between communities will be improved to encourage active travel;</p> <p>5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates.</p> <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p>

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							<p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs. <p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings.

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							<p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep895	Messrs David Julian James and John Wall		787752	Object	Housing Sites	Policy H 1	<p>Lakeside Golf Driving Range, Water Street, Margam</p> <p>There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one at Lakeside (PT12)</p>
Dep898	Marian James		787833	Object	Housing Sites	Policy H 1	<p>Land South of Abbotts Close, Margam</p> <p>There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one South of Abbotts Close PT14.</p>
Dep902	Julian and Emma James		787828	Object	Housing Sites	Policy H 1	<p>Forest Lodge Lane, Cwmafan</p> <p>There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one at Forest Lodge Lane PT19.</p>
Dep904		Tudor Inn Developments Ltd	318564	Object	Housing Sites	Policy H 1	<p>Tudor Inn, Cae Rhys Ddu, Cimla</p> <p>There are a large number of houses grouped as windfall sites which I feel does not offer enough flexibility to the house developers and more sites should be allocated including this one at the Former Tudor Inn N18.</p>
Dep934		Oak Regeneration Incorporated	589629	Object	Housing Sites	Policy H 1	<p>Land at Margam Surface Mine, Margam</p> <p>SITE SUITABILITY</p> <p><i>Environmental, Social and Economic Advantages</i></p> <p>PPW advises that new settlements should only be proposed where such development would offer significant environmental, social and economic advantages over the further expansion or regeneration of existing settlements. It should be noted that in terms of the site selection sequence, prior to the recent cessation of coal extraction, Margam has functioned as an active open cast coal mine for over 50 years and can no longer be considered a greenfield site in its truest sense.</p> <p>In requesting that Margam be included as a housing allocation, Oak Regeneration appreciates that all sites allocated for housing have to be rigorously assessed and evidenced that they will be delivered within the Plan period. Technical assessments completed to date have tested</p>

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							<p>the deliverability of a phased garden city project in the region of 2,500 homes over a twenty year period, with capacity to deliver new schools, community infrastructure and neighbourhood services. Based on these assessments, the following phasing strategy is proposed:</p> <ul style="list-style-type: none"> • Phase 1 2013 - 2026 250 houses • Phase 2 2026 - 2028 750 houses • Phase 3 2029 - 2030 750 houses • Phase 4 2030 - 2033 750 houses <p>These technical assessments also conclude that there are a number of significant environmental, social and economic advantages of Margam as a housing site. Strategically, these benefits relate to its location at the heart of the M4 corridor between Swansea and Cardiff and its capacity for direct and sustainable links to the local rail and road network.</p> <p>Margam also presents an opportunity to deliver a zero carbon exemplar community using a new interpretation of the garden city concept based on the sites developable renewable energy resources. Included within the emerging masterplan, is the unique capability of the site to produce geothermal heat which will be capable of delivering the heating and cooling demand of the residential proposal in its entirety.</p> <p>Together with a revised restoration scheme which will reinstate a river corridor and create an attractive lakeside environment and focus for leisure use and biodiversity enhancement, development at this location would also help to meet the need for housing in Port Talbot / Bridgend area, to attract people of a working age to live in the County Borough and to provide a range of housing types including affordable and lifetime homes.</p> <p>Local planning authorities are required by PPW (2011) to consider the following criteria in deciding which sites to allocate for housing in their development plans. The table below provides a summary of Margam's site suitability against each criterion.</p> <p>Criteria for Assessing Housing Allocations (PPW) / Site Suitability</p> <p><i>The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility</i> - The site has potential for use of the existing rail link to provide a sustainable public transport link and it can connect the short distance to the M4 motorway via new road improvements.</p> <p><i>The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure</i> - The site has a railway platform which can provide a sustainable public transport link and can connect the short distance to the M4 motorway via new road improvements. There are opportunities to integrate the Garden City design with the neighbouring settlements of Kenfig Hill and Pyle. Margam's potential to expand its green infrastructure (rail link, renewable energy sources, SUDS and community parklands) could be of significant value to sustainability of its adjacent communities.</p> <p><i>The scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities</i> - Margam presents an opportunity to deliver a zero carbon exemplar using a new interpretation of the garden city concept. This approach will be based on the sites available renewable energy resources. Included within this strategy, is the unique capability of the site to produce geothermal heat which will be capable of delivering the heating and cooling demand of the residential proposal in its entirety. A bespoke restoration scheme which restores a river corridor and creates a unique lakeside environment will be the focus for leisure use and biodiversity enhancement. Notwithstanding the above comments in relation to green infrastructure, the site's capacity to integrate with neighbouring settlements means that it is ideally placed to provide a wide range of house types including those that are more suited to an aging population and smaller households. The development would also provide a range of housing types including affordable and lifetime homes.</p> <p><i>The physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes</i> - PPW advises that new settlements should only be proposed where such development would offer significant environmental, social and economic advantages. The proposed restoration plan will provide the opportunity to</p>

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							<p>address the environmental legacy of mining operations at Margam. In this sense its contribution to the forward planning framework for the region would be considerable.</p> <p><i>The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development</i> - Neighbouring settlements have experienced mining activity followed by a stalled and undeliverable restoration scheme. A final phase of coal extraction, followed by a comprehensive 'whole site' restoration strategy will provide the basis for a development that is ultimately compatible with established land uses and which provides a green infrastructure network that can make this land use inherently sustainable in the long term.</p> <p><i>The potential to reduce carbon emissions through co-location with other uses</i> - Completed technical assessments conclude that there are a number of available renewable resources. The use of these resources will be considered in the context of neighbouring settlements where the benefits and associated reduction in carbon emissions could extend.</p> <p>Conclusion</p> <p>In the light of the substantial opportunity for a sustainable residential development, Oak Regeneration requests that the LDP recognises the Margam site as a substantial brownfield site, with the potential to contribute to the delivery of tourism, housing and renewable energy targets set by the County Borough Council. This amendment would enable the plan to satisfy the following coherence and effectiveness tests:</p> <ul style="list-style-type: none"> • The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. • It is reasonably flexible to enable it to deal with changing circumstances. <p>In the absence of these amendments, the LDP is considered to be unsound, and an objection has been lodged on this basis.</p> <p>As it is envisaged that a project of this significance will extend beyond the 15 year life of the current LDP, the focus of this submission is to request that the LDP (2011 - 2026) makes provision to cater for Phase 1 of the Margam 'garden city' development. This would provide sufficient certainty to allow investment to be focused on land remediation, restoration and enabling infrastructure in the short to medium term.</p> <p>Oak Regeneration therefore formally request that Neath Port Talbot Council give consideration to the merits of the Margam 'omission site' and amend the LDP to allocate land at Margam for housing and related tourism / renewable development, which would foster the delivery of an overall restoration and regeneration scheme. In particular, it would provide for:</p> <ul style="list-style-type: none"> • A restored landform to make provision for enabling infrastructure; • Maturing landscaping features to develop; • A lake / series of lakes to be designed to accommodate geothermal lake collectors; and • The introduction of other sustainable energy features to include solar PV and biomass.
Dep963	Mr John Doran		286649	Object	Housing Sites	Policy H 1	<p>Land at James Street, Pontardawe</p> <p>I wish to ask why it appears that the LDP does not support the small developer and/or their candidate sites.</p>
Dep1238		Ryehill Properties (Wales) Ltd.	787653	Object	Housing Sites	Policy H 1	<p>Sarn Farn Baglan Road, Baglan</p> <p>The Council should allocate additional housing sites to meet the housing requirement identified by the Welsh Government. Land at Sarnfan, Dinas Baglan Road, Baglan is considered to be a suitable site, being sustainability located within the settlement boundary of Baglan. Please see Alternative Site Representation for further information on the site. In addition, it should be noted that an outline application was submitted for 78 residential units at the site on 30th March 2012 (P2012/0352). A CD copy of the application documents is also enclosed for</p>

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							<p>information which demonstrates that there is no constraint to the development of the site. The application documents include:</p> <ul style="list-style-type: none"> • Site Location Plan (LP-01); • Topographical Survey (5350C/500AO/1.1C); • Proposed Junction Arrangement, Cross Sections, Vehicle Swept Analysis and Footpath Schematic (Ref's: H1130, H1131, H1000, H1001, H1002, H1118) produced within the Transport Assessment; • Transport Assessment (Hyder, January 2012); • Design Calculations and Records in Support of Transport Assessment (Hyder, November 2011); • Phase 1 Environmental Survey (Merriman Ltd, March 2009); • Ecological Appraisal (CBE Consulting, July 2010); • Reptile Survey (CBE Consulting, July 2010); • Protected Species Survey (CBE Consulting, September 2010); • Tree Survey (CBE Consulting, November 2011); • Construction Methodology and Sequence Statement (HHB Construction Management Services Ltd, November 2011); • Privacy / Overlooking Assessment (Barton Willmore, March 2012); • Noise Assessment (Hunter Acoustics, March 2012); • Correspondence with Welsh Water (letters dated 29th May 2009 and 2nd June 2010 refer); • Flood Consequences Assessment (Hyder, January 2013); • Indicative Site Layout Plan (Hammond Architectural Ltd, May 2012); • Cross Sections (Hammond Architectural Ltd, May 2012); • Design and Access Statement (Barton Willmore, July 2012) and Supporting Photomontages (Anthony Jellard Associates, November 2011); and • Noise Assessment (Hunter Acoustics, June 2012). <p>The site should be allocated within the plan, given that it would make a logical extension to the adjacent allocation at Stycyllwen (H1/LB/15).</p>
Dep1243	Mr Martin Turner		196329	Object	Housing Sites	Policy H 1	<p>Land at Glan yr Afon, Ystalyfera</p> <p>I wish to appeal against the decision not to include the parcel of land between the River Tawe and Glanyrafon in Ystalyfera in your local development plan.</p> <p>I would ask you to explain the comparisons of levels between this candidate site and the recently submitted full plans application for 121 new properties adjacent to the GMF Motor Factors Site. Whilst I note the concerns in the current proposals regarding flooding risks, I believe we are able to mitigate these flooding risks with careful design which would not only protect this development but also existing residential development around this site. It is also clear that this area of Ystalyfera is in dire need of further residential development.</p> <p>It is clear that the current thinking is based on flawed detail, namely the DAM maps in the TAN 15 as they relate to flooding considerations.</p> <p>I am of the view that the plan is unsound firstly due to its inflexibility, secondly because it is confining all residential growth to just one site in Ystalyfera. Excluding other sites for potential residential development is not providing sustained residential growth in the Upper Swansea Valley. It is apparent that these individual sites are being treated differently; an equality issues.</p> <p>If the current plan is accepted, the developer of the designated site will dictate residential growth within the community of Ystalyfera. This is not a sustainable nor a robust solution for the positive growth of the community. The location of my proposed site; land at Glanyrafon, Ystalyfera is similarly adjacent to major public transport routes and significant public service provision and is therefore considered to offer a suitable alternative development option that meets all sustainable development criteria.</p> <p>We consider the NPTC should evaluate the pragmatic benefits offered by inclusion of this land as an LDP site and would respectfully ask that the inspector's attention be drawn to the many benefits of this proposal.</p> <p>We would ask that, if required, NPTC give thought and guidance to what additional information they would require at this time.</p>

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							<p>The question of the TAN 15 designation is acknowledged, although the voracity and robustness at the relevant DAM is questioned in this regard. We would draw to the attention of NPTC and the Inspector, the material relevance of the areas of topography and the informed decision making process recently concluded in relation to developments at land adjacent to GMF Motor Factors. We welcome the opportunity for positive liaison with NPTC to further inform this debate.</p> <p>We believe that NPTC undermines its wider strategic aims within the LDP by limiting options for housing within this particular area of Swansea Valley.</p> <p>Smaller sites located to the relevant services provide real and flexible development options to meet wide ranging demands. These demands are then potentially being subject to the vagaries and commercial aspirations of those that would control a smaller number of larger sites.</p> <p>In looking at the Swansea Valley as a whole from the area centre at Pontardawe to the further reaches of the administrative area, we would contend that it is the inclusion of smaller sites such as that proposed which add to the ability to provide a flexible and responsive solution to deal with all eventualities and demands throughout the Swansea Valley.</p> <p>We would therefore respectfully request that you give positive and pragmatic consideration to the benefits of inclusion of this site.</p>
Dep1287	Mr. Sam Hawking and Mr. Dan Madge		787198	Object	Housing Sites	Policy H 1	<p>Land to the South of Graig Road, Godre'r Graig</p> <p>Objection seeking realignment of settlement boundary south of 262 Graig Road, Godre'r Graig, SA7 2NZ and revisions to para 5.1.6</p> <p>1. Introduction</p> <p>1.01 This submission objects to the removal from the current UDP settlement boundary of the parcel of land described within. It also sets out an objection to the detailed process lying behind that described in para 5.1.6 for identifying small sites within the LDP settlement boundary which has led to the proposed removal of this site.</p> <p>2. Analysis of this piece of land and its context</p> <p>2.01 The objectors, private property developers, are currently involved in negotiations to purchase the sites set out within for residential development, and specifically are within days of land-transfer on the most southerly plot A, which is in the hands of solicitors. Due to the timing of the LDP deadlines the purchases have not yet gone through.</p> <p>2.02 The most south-west plot (A on the attached plan, appendix 1) did contain a row of garages, and one still remains, with the hard standings of the others remaining albeit some are under vegetation including Japanese Knotweed. It had outline planning consent P2008/0544 dated 13th January 2009 for 2no. semi-detached houses and 1 detached house. The details pursuant application had to be lodged by the owner/applicant by 13th January 2012. This did not occur. The whole development then would have had to start construction by 13th January 2014 but because the first deadline was missed the application is now deemed lapsed or 'lost'. The objectors were not informed of the lapse, and discovered it only recently. The current owners believed that they had 5 years to start on site and did not understand the 3-year section and its implications.</p> <p>2.03 Plot B (appendix 1) to the immediate north has planning consent P2004/0875 followed up by P2007/342 for 2 semi-detached dwellings. Construction of the foundations and upper-level deck started and therefore planning is extant or 'at large'.</p> <p>2.04 Plot C (appendix 1) is no. 262 Graig Road. This is an existing house with significant land to the rear and NE, which makes up the remainder of the land subject to this objection. It is currently empty and in a bad state of repair due to its owner being in a nursing home with no delegated power of attorney. Only the SW part of this site, that specifically around the house, is included in the current UDP plan despite the fact that the land ownership of 262 includes the land to the NE within plot C.</p> <p>2.05 The sites are level with the back edge of pavement and thereafter the land falls steeply to the south-east, albeit at varying depths and</p>

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							<p>angles of gradient. There are other outlying sheds on the down-slopes and the site may be described as 'brownfield'. See photos.</p> <p>2.06 Although there is in places dense shrub cover this is as a result of general cover since the plots have received planning consent. There are no mature trees on the site but some smaller, poor quality species, as with many other gap-plots along this lengthy road.</p> <p>2.07 Graig Road lies within a long settlement boundary that stretches along the A4067 Brecon Road valley towards Ystalyfera as shown on the current UDP plan (reproduced in appendix 2) but focussed on the upper road that runs parallel for most of the distance. The parcel of land that we refer to is circled, albeit the garden or 'curtilage' to 262 Graig Road is not fully included. Appendix 3 shows an enlarged view of the area again circled.</p> <p>2.08 Although in this section of Graig Road there is little land included south of Graig Road, it will be seen that to the south west and north east this is not the case and both sides of the road are included. The LDP proposed the removal of this section and shows only the northwest side of this section of road as deemed acceptable within the settlement limit.</p> <p>3. Policy framework</p> <p>3.01 The current UDP settlement boundary includes much of the subject land in the settlement boundary. To achieve this the planning consented sites and actual building plot in this particular location were included.</p> <p>3.02 Paragraph 5.1.6 of the LDP states the following "Allowances - these sites will not be specifically identified within the Plan, but the contribution they will be expected to make will be accounted for by incorporating an allowance into the overall housing provision. These sites have been calculated based on past trends, the settlement hierarchy and the results of the urban capacity study. They comprise:</p> <ul style="list-style-type: none"> • Windfalls - sites of 10 residential units or more which may comprise previously developed sites which may unexpectedly become available over the Plan period. • Small Sites - sites with a capacity of less than 10 residential units which comprise of previously undeveloped land and small windfall sites (that are unforeseen). " <p>3.03 Lying behind the main LDP is a background paper entitled " LDP Strategic Housing Site Assessment Report August 2013". As the name suggests it sets out the systems and procedures used to identify and assess sites for, among other things, the new LDP settlement limits.</p> <p>3.04 Within this clauses 3.1.1 & 3.1.2 state: "In order to ensure that the land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP the Council has taken a significant number of sites into consideration, including those UDP allocations that currently remain undeveloped which do not have a 'live' planning permission.</p> <p>It should be emphasized however that the assessment itself was not designed to provide detailed technical assessment on a site-by-site basis; the process simply provided a comprehensive overview of the development potential of sites and critically is based on the best information available at the time of the Plan preparation." (their emphasis) Following these statements there is table 3.1 "Detailed site analysis" which shows how sites were assessed.</p> <p>3.05 Clause 3.2.1 states that: "the report concentrates on "the stage 4: detailed assessment, and considers the following:</p> <ul style="list-style-type: none"> • Those Candidate Sites that reached Level 4 of the Methodology • Those UDP allocations that currently remain undeveloped which do not have 'live' planning permission, and • Additional sites that were considered worthy of assessment <p>3.06 Nowhere that we could find is there a statement about the necessity of a current planning consent being in place for a site to survive.</p>

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							<p>However, the following clause 3.2.2. states: "Given that such (landbank) sites have a 'live' planning consent the sites were not scrutinised and subjected to the same level of assessment".</p> <p>3.07 Close discussion and analysis with the NPT staff however has identified that where small sites on the edge of settlement limits have a lapsed planning consent they are automatically removed from the LDP settlement limit. The view of the LPA officers is that the owners have shown no evidence of wishing to pursue the sites and thus other sites should take their place. It appears that in fact no "stringent assessment" takes place.</p> <p>3.08 We have argued in another very similar objection (62 Afon Road, Duffryn) that a wide range of housing sites is required to maintain inward investment and community growth around existing settlements without placing further pressure on green belt and open countryside. Thus, in our view, LPAs should actively include small sites that are 'gaps' within existing well-established settlements and not be fighting any increases beyond allocations that can be made from 'theoretical' sites that actually remain undeveloped for countless years. And as they state, such sites, without any planning consents, are retained despite total inactivity. The LPA being ahead of developers is a positive benefit in this case.</p> <p>3.09 We therefore suggest that a paragraph is inserted of this nature: "Unless there is some significant change of circumstance that would render a small site no longer 'sustainable' or would fail another criterion of the site selection process, such small sites where planning consent has lapsed but are within the previous settlement boundary shall remain within the settlement boundary and shall not be automatically removed."</p> <p>4. The arguments for retaining (and extending) this specific site Plot A</p> <p>4.01 Removal of sites that have been through the planning process for the simple reason that nothing appears to be happening, upon which planning consent has been granted, and where the UDP boundary has been extended to enclose them, is, we suggest, inconsistent. Much time and effort (and income) was spent assessing their suitability and it is now arbitrarily thrown away. As quoted above, the council does not take this attitude with the larger, strategic sites. Further, nowhere could we find any written indication that these small sites (where the planning has lapsed) are to be automatically removed. Whether stated or not we object to this arbitrary removal.</p> <p>4.02 There are many reasons why a site may not have progressed. The extraordinary effort of the parties to obtain consent should not be so lightly wasted. This is especially true where the site is in the centre of a settlement boundary such as plot A, almost the epicentre of the long drawn out boundary for this ribbon settlement.</p> <p>4.03 In addition the site adjacent has received planning consent and work has started, and beyond that is an existing house and without a single gap the other side of the road is developed for residential use. An overwhelmingly strong case exists for retention.</p> <p>4.04 The site would still meet all the criteria set out in the "LDP Strategic Housing Site Assessment Report August 2013". It is brownfield and as sustainable as any others in the whole street. Nothing has occurred in the intervening year (2013) that would mean that it now fails the criteria.</p> <p>4.05 In this case the owners claim that they thought the planning consent had until January 2014 to run and that is why the site was up for sale to the objectors. The site is thus in fact active whether or not planning has lapsed. No rigorous examination has occurred here. But without pointing blame we have an opportunity here to retain the site, and surely others, in the LDP.</p> <p>Plot B</p> <p>4.06 It is hard to understand why a site with an extant planning permission has been removed. We feel there is little more to add to what has already been stated for this and other parts of the site. Although planners may be irritated that the building has not been completed there may again be many reasons why this is so, worthy of investigation. Perhaps a system should exist to force or encourage sites to be developed but treating the Plan as if there is nothing there (effectively) is not the answer, and the answer to such 'stuck' development sites surely lies outside the LDP planning review process and better set in a legal process. In fact, as we can now show, a developer (the objector) is seeking to unlock the site and is finding that the site is being undermined by apparent unaccountability within the LDP process.</p>

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							<p>Plot C</p> <p>4.07 If plot B is hard to understand then taking an existing house out of the centre of the UDP settlement boundary is impossible to fathom for the general public, especially when all the other factors enumerated above are taken into account.</p> <p>4.08 In fact as simple research has shown the owner is elderly and confused, in a care institution, and possibly unable to make decisions. The house is likely to remain undeveloped until his death and then the trustees/administrators may act. In this case there is thus the opportunity to retain a site that will contribute within the existing well-established settlement where people are used to seeing a large, rambling house, and where, if the full land holding is included a few more houses could be accommodated without any real objection.</p> <p>4.09 But when the three plots are taken together the contribution, which may be perhaps 8 - 10 houses becomes significant. If the site were already a strategic site it wouldn't even need planning consent to be retained for 30 years or so as designated land supply for housing.</p> <p>5. Conclusion</p> <p>5.01 For the reasons set out above we object to the procedural test P2 ("The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment") being adequate, since no real test has in fact been applied, or if it has there is no transparency.</p> <p>5.02 We also object to Consistency tests C1 ("It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas") because it appears to have no regard to anything in the area and vicinity.</p> <p>5.03 C4 states that "It has regard to the relevant community strategy/ies". However it fails in this site's case to take into account the community housing needs which are to ensure that this particular area is provided with a good range of housing without further expanding the linear development into open landscape and countryside. We thus believe that it fails this test as well.</p> <p>5.04 We wish to object to Coherence and Effectiveness tests CE1 and CE4 with regard to our site and specifically to encourage the inclusion of our site and indeed others on the down-side of the road. We see a lack of coherent strategy or flexibility in this case.</p>
Dep1317		Giroma Developments Ltd	324467	Object	Housing Sites	Policy H 1	<p>Land adjacent to Travancore, Pentwyn Road, Cynonville</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.25 hectares, set immediately to the rear of established residential houses at Pentwyn Road, Cynonville.</p> <p>We seek that the land be allocated, together with an adjoining site with planning permission for 20 units, as Housing Site, under Policy H1, and an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cynonville is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, Including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes;

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							<ul style="list-style-type: none"> the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; the potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Cynonville will:</p> <ol style="list-style-type: none"> Form a logical extension to the built settlement form of Cynonville, without any demonstrable harm to the central valley landscape, by utilising mature and defensive natural and man-made boundaries to distinguish it from surrounding countryside. The site is part of previously developed land, being part of a former garden centre, with direct access off Pentwyn Road. The land in question constitutes a sliver of land some 75 metres in length by 30 metres in depth, set between the rear garden boundaries of houses, and the crest of a former railway cutting. It is therefore not considered to be an expansion into open countryside, given that the railway cutting provides a solid, man-made barrier consolidating the built form of Cynonville. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses. Aid to foster the sense of Afan Valley identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Village" status within the LDP. <p>The site should be considered as a minor extension to that granted Outline Planning Permission under P2010/1176 in November 2011, and should contribute to the allocation of housing under Policy H1 for the above reasons. The minor addition will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some three additional units, to the 20 units already benefiting from permission will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep1324	Mr F J Yardley	West Midlands Development Partnership Ltd,	322589	Object	Valleys Regeneration Scheme	Policy VRS 1	<p>Land at the former Blaenant Colliery, Crynant</p> <p>The site comprises land immediately south of the Former Blaenant Colliery, Crynant (now known as the Cefn Coed Colliery Museum) measuring approximately 3.17 ha. (7.84 acres).</p> <p>The site is not currently identified for any specific allocation in the Deposit Draft LDP and in our view should be identified either as a stand-alone residential/live-work development site or as enabling development to support the regeneration/redevelopment of the existing museum.</p> <p>Redevelopment of the site is in accordance with some of the key issues which the LDP seeks to address, namely KI 9: Sufficient land needs to be provided over the LDP period to meet the requirements of businesses and KI 14: There are significant areas of brownfield (previously developed) land requiring remediation and regeneration.</p> <p>The redevelopment of the site would also accord with the LDP's vision: "The County Borough's rural areas and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising on existing successes ..."</p> <p>In support of this also are the LDP's over-arching objectives OB6: Reinvigorate the Valley areas and improve economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth; OB11: To promote and protect a diverse portfolio of employment land and employment opportunities to meet the needs of residents and businesses and stimulate economic growth; and OB14: Provide a holistic approach to tourism, development to capitalise on Neath Port Talbot's growing tourism industry, specifically growth in the</p>

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							<p>Neath and Afan Valleys to support the local economy.</p> <p>In terms of the LDP's spatial strategy, the regeneration of the site would accord with paras. 2.5.33, 2.5.50-51 and 2.5.53 and whilst we acknowledge that the site is not within or immediately adjacent to a settlement boundary, the LDP espouses a "flexible" approach.</p> <p>In policy terms, the regeneration of the site is in accordance with policies SP2 - Health, SP6 - Development in the Valleys Strategy Area (specifically point 7), SP11 - Employment Growth and EC6 - Live/Work Units.</p> <p>As a site upon which residential use is proposed either singularly or in the form of a live-work development, we would argue that the site has immediate access to the settlement of Crynant via the disused railway which could be redeveloped to provide a footpath. In this respect we would argue that it could be made to be sustainable. Without some higher value form of development to support the investment which is necessary to regenerate it, the site is destined to remain derelict and disused.</p> <p>We believe that the best way forward would be to identify the site in the same policy context as the site at Glynneath which is covered by policy VRS1 Valleys Regeneration Scheme/TO3 Tourism Led Regeneration. The site could then be identified as a tourism-led regeneration scheme comprising a mix of residential and employment uses (either singularly or together) to support the redevelopment of the Cefn Coed Colliery Museum.</p>
Dep1325	Mr F J Yardley	West Midlands Development Partnership Ltd,	322589	Object	Tourism Led Regeneration	Policy TO 3	<p>Land at former Blaenant Colliery, Crynant</p> <p>The site comprises land immediately south of the Former Blaenant Colliery, Crynant (now known as the Cefn Coed Colliery Museum) measuring approximately 3.17 ha. (7.84 acres).</p> <p>The site is not currently identified for any specific allocation in the Deposit Draft LDP and in our view should be identified either as a stand-alone residential/live-work development site or as enabling development to support the regeneration/redevelopment of the existing museum.</p> <p>Redevelopment of the site is in accordance with some of the key issues which the LDP seeks to address, namely KI 9: Sufficient land needs to be provided over the LDP period to meet the requirements of businesses and KI 14: There are significant areas of brownfield (previously developed) land requiring remediation and regeneration.</p> <p>The redevelopment of the site would also accord with the LDP's vision: "The County Borough's rural areas and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising on existing successes ..."</p> <p>In support of this also are the LDP's over-arching objectives OB6: Reinvigorate the Valley areas and improve economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth; OB11: To promote and protect a diverse portfolio of employment land and employment opportunities to meet the needs of residents and businesses and stimulate economic growth; and OB14: Provide a holistic approach to tourism, development to capitalise on Neath Port Talbot's growing tourism industry, specifically growth in the Neath and Afan Valleys to support the local economy.</p> <p>In terms of the LDP's spatial strategy, the regeneration of the site would accord with paras. 2.5.33, 2.5.50-51 and 2.5.53 and whilst we acknowledge that the site is not within or immediately adjacent to a settlement boundary, the LDP espouses a "flexible" approach.</p> <p>In policy terms, the regeneration of the site is in accordance with policies SP2 - Health, SP6 - Development in the Valleys Strategy Area (specifically point 7), SP11 - Employment Growth and EC6 - Live/Work Units.</p> <p>As a site upon which residential use is proposed either singularly or in the form of a live-work development, we would argue that the site has immediate access to the settlement of Crynant via the disused railway which could be redeveloped to provide a footpath. In this respect we would argue that it could be made to be sustainable. Without some higher value form of development to support the investment which is</p>

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							<p>necessary to regenerate it, the site is destined to remain derelict and disused.</p> <p>We believe that the best way forward would be to identify the site in the same policy context as the site at Glynneath which is covered by policy VRS1 Valleys Regeneration Scheme/TO3 Tourism Led Regeneration. The site could then be identified as a tourism-led regeneration scheme comprising a mix of residential and employment uses (either singularly or together) to support the redevelopment of the Cefn Coed Colliery Museum.</p>
Dep1350	Mr Paul Bulmer		345444	Object	Walking and Cycling Routes	Policy TO 4	<p>Bryn Beast Cycle Route</p> <p>The various mountain bike trails in the Afan valley are also listed and their importance to tourism stressed. The Bryn Beast route is now way marked and is of the same significance to runners as are the mountain bike routes to cyclists. This new route should be included.</p> <p>Bryn has now established itself as the home of the ' Bwystfil y-Bryn 'and should also be included in the tourist notes.</p>

PART 3: DELETED SITES

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep802		Associated British Ports	587221	Object	<p>Policy M3 - Minerals Buffer Zone indicates that within such buffer zones any new development that would prejudice the future extraction of permitted reserves or the operation of the site will be resisted. A M3 site and buffer zones is proposed within the Docks however this site has been worked and as such it should be deleted from the LDP.</p> <p>The site was the subject of a minerals planning permission for sand and gravel extraction (Ref: 2005/1756) and the site has been worked out under this permission. There are now only very limited, if any, sand and gravel reserves left at the site and as such it is not considered that the allocation of the site under this policy is appropriate. Indeed, it could be considered to fetter potential development opportunities on the site which is located within the long established operational docks which contribute significantly to the economy of the area and which ABP intend to improve in the future.</p> <p>Furthermore, the same site is the subject of a planning permission for a biomass power station (Ref: 2006/1455). We are advised that pre-commencement conditions relating to this permission have been discharged and the permission has been implemented by the commencement of the construction of the emergency access road. This has therefore resulted in the minerals planning permission being superseded and further confirms that the proposed allocation under Policy M3 is inappropriate.</p> <p>Having regard to the above therefore the proposed allocation within Port Talbot Docks under Policy M3 should be deleted.</p>	Sand & Gravel Site, Port Talbot Docks
Dep858	Mrs Mavis Hewitt	Blaenhonddan Community Council	474834	Object	<p>This application represents the views of the 18 Members of Blaenhonddan Community Council. The Council is of the view that the two residential sites ref H1/1 and H1/2 fail the tests of soundness relating to C1 and CE2 and CE3 detailed above. The Policy SP20 in statements 6 and 7 clearly state the Authority will restrict development which would have an unacceptable impact on highway safety and require development proposals to be designed to provide safe and efficient access. The Council is of the view that the sites do not comply with such policies. In relation to Policy EN3 Green Wedges - SC1 "to restrict development outside settlement limits" and "To restrict inappropriate development within green wedge areas. The Council is of the view that the site H1/2 does not comply with such policies.</p>	H1/1 Gorffwysfa Care Home, Bryncoch
Dep36	Mrs Patricia Elsie Kelly		333098	Object	<p>H1/2 Standard Letters Version 1 & Version 7</p> <p><u>Letter Version 1</u></p> <p>I wish to once again register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:</p> <p>Removal of Land from the Green Wedge : This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area . It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access : There is no sensible access to this development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use.</p> <p>Traffic : 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape : This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP .</p> <p>Environment : The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan .</p> <p>Infrastructure / Services :</p> <p>Schooling : Already local schools are at or near capacity with inadequate parking and congestion.</p> <p>Local Services : We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be in easy walking distance from the houses proposed and a playground further. All journeys will add to traffic problems.</p> <p>Please note:</p> <p>In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan.</p> <p>In 2008 Neath Port Talbot County Council protected this site from development.</p> <p>In August 2009 , the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park.</p> <p>In December 2010 , the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive.</p> <p>In October 2012 a further 300+ objections were made to Candidate site H1/8 . This is the same site, but just a different number.</p> <p>All those objections must be carried over and considered in this case.</p> <p><u>Letter Version 7</u></p> <p>Traffic The additional traffic generated will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road. The traffic assessment conducted shows this junction approaching and over capacity even with the proposed highway improvements. How is this sustainable planning? Access onto Penywern Road from the existing estate is already difficult at peak times. Neath Abbey Road leading to the A465 experiences major congestion at peak times. This condition will deteriorate further. This does not appear to have been included in the traffic assessment.</p> <p>Access There is no sensible access to this development. An application for access between Nos. 39 & 50 Leiros Park Drive was rejected by both the council and the assembly inspector in December 2010. The site assessment report states that Gilfach Road is not suitable to provide access (4.1.7.6). Daphne Road is very similar. The steep gradient and narrow width of Daphne Road are not suitable to support increased traffic numbers. Road safety concerns raised at earlier phases have not been answered.</p> <p>Position Although geographically close to Neath town centre access by foot or cycling will not be chosen / possible for the vast majority of residents due to the very long steep gradients. The very limited services and facilities within Bryncoch are a significant distance away. The car will account for nearly all journeys to both locations. Public transport to the existing estate is poor. This may well continue. Use of Penywern Road public transport as suggested in the site assessment is not appropriate due to the elevated site location.</p>	

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					<p>Green Wedge The area is part of a Green Wedge. The site assessment report states that the integrity of the designation will not be unduly undermined by development in this location. Disagree. Any erosion of the green wedge is unacceptable. Development should be on brownfield sites only. There are significant sites available.</p> <p>Landscape The site is above 90m. It cannot be well hidden and will dominate views from the surrounding areas. The Welsh Assembly Inspector clearly documented this in her 2006 report. The site assessment report states that the visual impact of the smaller site (removal of N55) is considered to be more limited (4.1.7.8). Disagree - The N55 area was generally the lower lying area.</p> <p>Environment These fields have significant wildlife. Development will undoubtedly threaten their habitats. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>Financial Viability of the site Developer contributions are required for upgrades of highways, water and sewage, education and health, facilities on site or in Bryncoch. This together with the need to provide 20% affordable homes and single storey properties on the higher elevations will have an impact on the commercial viability of the site. No evidence has been provided to show that the site is commercially viable.</p>	
Dep33	Mrs Diane Shackell		333102	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep35	Mr Robert F Shackell		333105	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep47	Mrs Mary Beasant		333128	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep57	Mrs Rosalind Higgs		334200	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep60	Mr BEW Higgs		334201	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep53	Mr DTR Evans		334269	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep51	Mrs EJ Evans		334270	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep55	Mr David W Phillips		336036	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep58	Mrs Christine Phillips		336038	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep32	Lynn		338990	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros

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	Thomas					Park Extension
Dep42	Mrs Michelle Roberts		345058	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep39	Mr Ian Hugh Roberts		345059	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep50	Mr T D Rowles		347361	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep46	Mr Kenneth Thomas		347897	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep48	Mrs Pamela Thomas		347900	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep45	Mr E Thomas		474032	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep29	Aimee Collier-Rees		477562	Object	I would like to register my disagreement / objection to the planned housing development at Leiros Park . As a resident of this area I am concerned of the effect on traffic and also the local schools are already overwhelmed with pupils. It would turn this safe, peaceful area into a noisy and unsafe environment for the elderly and young, the extra traffic onto Pen Y Wern road would result in more issues with speed.	H1/2 Leiros Park Extension
Dep54	Mr Hywel Thomas		691165	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep59	Mrs Marion A Thomas		692570	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep56	Mr Simon Johnson		709153	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep34	Mr George Kelly		779922	Object	H1/2 Standard Letter Version 1 and Version 7	H1/2 Leiros Park Extension
Dep31	Mrs Ruth Aplin		780610	Object	H1/2 Standard Letter Version 1 & Version 7 Plus additional comments: I wish to put forward my strong views against the building of 200 new houses in Leiros Parc. I really think that this area is not appropriate for the building of such a large number of houses. The road is already incredibly busy and it is extremely difficult to get our into Pen Y Wern hill currently, especially in the mornings. With another 200 houses this issue will get even worse. This is as	H1/2 Leiros Park Extension

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					<p>well as disrupting an area of beauty within the area.</p> <p>I have put forward my views on a number of occasions regarding this issue and still strongly believe that this area is totally inappropriate for the building of such a large number of houses.</p> <p>We already pay an incredibly high rate of council tax and the area seems to be ignored anyway as the park is unkept and there are a number of pot holes around and the pavements are dangerous (particularly in my street Curlew Close). How can the Council justify adding another 200 houses when they can't even look after what is already there?</p>	
Dep30	Mr Chris Aplin		780611	Object	<p>I wish to put forward my strong views against the building of 200 new houses in Leiros Parc. I really think that this area is not appropriate for the building of such a large number of houses. The road is already incredibly busy and it is extremely difficult to get our into Pen Y Wern hill currently, especially in the mornings. With another 200 houses this issue will get even worse. This is as well as disrupting an area of beauty within the area.</p> <p>I have put forward my views on a number of occasions regarding this issue and still strongly believe that this area is totally inappropriate for the building of such a large number of houses.</p> <p>We already pay an incredibly high rate of council tax and the area seems to be ignored anyway as the park is unkept and there are a number of pot holes around and the pavements are dangerous (particularly in my street Curlew Close). How can the Council justify adding another 200 houses when they can't even look after what is already there?</p> <p>Second Letter</p> <p>I wish to once again register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:</p> <p>Removal of Land from the Green Wedge: This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area. It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access: There is no sensible access to this development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use.</p> <p>Traffic: 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape: This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP.</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Environment: The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>Infrastructure / Services: Schooling: Already local schools are at or near capacity with inadequate parking and congestion. Local Services: We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be in easy walking distance from the houses proposed and a playground further. All journeys will add to traffic problems.</p> <p>Please note: In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan. In 2008 Neath Port Talbot County Council protected this site from development. In August 2009, the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. In December 2010, the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive. In October 2012 a further 300+ objections were made to Candidate site H1/8. This is the same site, but just a different number. All those objections must be carried over and considered in this case.</p>	
Dep38	Mrs R G Jones		780884	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep40	Mr A Combe		780901	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep43	Mrs M Combe		780902	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep37	Mrs Marion Loyns		780905	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep41	Mrs J. Thomas		780911	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep44	Mr David Loyns		780916	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep61	Mr Sid Leaker		781041	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep49	Mr JC Jones		791409	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep73	Mrs Anne Stone		333597	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep93	Mrs		334263	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	Euronwy Davies					Park Extension
Dep95	Rhian Davies		334264	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep86	Mrs Eira Thomas		334268	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep82	Mrs K Morris		335414	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep100	Mr Richard Madge		335420	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep96	Mrs Rosalind Madge		335424	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep124	Mrs Patricia Phillips		335961	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep97	Mr Bryan Lewis		336111	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep99	Mrs Kim Lewis		336114	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep78	Mr M V O'Hea		338807	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep109	Mrs J Gould		338813	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep88	Mr Godfrey W Carr		338902	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep68	Mrs Linda Feltham		338922	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep74	Ms Giovanna Evans		338925	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep62	Mr		338965	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	Denis C Baker					Park Extension
Dep126	Ms Jean John		338992	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep75	Mr Brian Hamer		338993	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep116	Mrs Janet McNicholas		338999	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep107	Mr P Hampton		339001	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep123	Mrs Maria Woods		339764	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep104	Mrs M Woodley		339793	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep102	Mr JA Woodley		339795	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep67	Mr Stephen Phillips		339805	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep81	DL Phillips		339807	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep125	Mr IP Evans		339810	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep119	Mr David Williams		339815	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep118	Mrs Teresa Williams		339819	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep110	Mrs M Hampton		342998	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep90	Mr		343669	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	Huw Gareth Thomas					Park Extension
Dep91	Mrs Christine Thomas		344135	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep76	P S Nichols		344136	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep72	G Nichols		344670	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep120	Mr Malcolm Hill		344676	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep121	Ms Rachel Hill		344677	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep114	Mrs Linda Broome		345044	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep71	Ms Joan Langston		345602	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep64	Mr Robert B Langston		345604	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep111	Mrs Eyril Bridgman		346996	Object	H1/2 Standard Letter Versions 1 & Version 7	H1/2 Leiros Park Extension
Dep85	Sarah Chapman		347357	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep103	Mrs Sharon Davies		466677	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep115	B R Bevan		472250	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep63	Mrs Anne James		472323	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep66	Mr J A James		472325	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep69	C.L.		473196	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	Stone					Park Extension
Dep84	Mr PG Jones		474026	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep79	Mr & Mrs Alan & Olwen Davies		692739	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep89	Mrs L I Evans		707379	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep112	Mrs Shirley Bevan		709070	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep101	Miss Gemma Marie Jordan		745733	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep122	Mr Reginald Woods		780463	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep77	Jayne Amos		781027	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep80	Len Amos		781028	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep65	Mrs Jean Leaker		781048	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep87	Susan Wells		781068	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep83	Robert Wells		781069	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep92	Mr R.T. Mogford		781077	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep106	Mr Gareth Davies		781198	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep94	Mr David Jenkins		781205	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep98	Mr Daniel		781218	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Davies					
Dep105	Mr Russell John Thatcher		781232	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep108	Mrs Margaret Ann Thatcher		781233	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep117	Ms Clare Redmore		781256	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep113	Mr Paul Pickering		781259	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep218	Mr Christopher Manley		330303	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep162	Mr. Graham Williams		331339	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep160	Mr Dennis J Picton		331495	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep188	Mrs Michelle Williams		333106	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep174	Mr John Williams		333107	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep219	Jayne Manley		333109	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep163	Mrs Marina Williams		333118	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep135	Mrs Michelle Thomas-Wheeler		333120	Object	<p>H1/2 Standard Letter Version 1 & Version 2</p> <p><u>Letter Version 2</u></p> <p>I wish to once again register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:</p> <p>Removal of Land from the Green Wedge : This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area . It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access : There is no sensible access to this development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use.</p> <p>Traffic : 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape : This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP .</p> <p>Environment : The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>Infrastructure / Services: Schooling : Already local schools are at or near capacity with inadequate parking and congestion. Local Services : We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be in easy walking distance from the houses proposed and a playground further. All journeys will add to traffic problems.</p> <p>Please note: In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan. In 2008 Neath Port Talbot County Council protected this site from development. In August 2009 , the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. In December 2010 , the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive. In October 2012 a further 300+ objections were made to Candidate site H1/8 . This is the same site, but just a different number.</p> <p>All those objections must be carried over and considered in this case.</p>	
Dep134	Mr Anthony Wheeler		333121	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep165	Mr David Lewis		334180	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep164	Mrs Janice Lewis		334182	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep195	Mrs Shirley Price		334272	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep257	Ms Andrea Evans		335225	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep182	Mr David Williams		335372	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep185	Mrs Annette Williams		335374	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep132	Mr Leighton Phillips		335957	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep187	Mr DJ Maddock		336102	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep189	Mrs PM Maddock		336104	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep247	Ms Sarah L Joseph		336129	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep244	Miss Pam Joseph		336142	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep170	Mr Eifion Jones		338810	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep198	Mrs J Buse		338954	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep145	J Davies		338959	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep235	Mrs Helen Baker		338969	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep193	Mr Robin Jones		339737	Object	H1/2 Standard Letter Version 4 <u>Letter Version 4</u>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>I wish to register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:-</p> <p>Removal of Land from the Green Wedge - This site was included by NPT Council as Green wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area. It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access - There is no sensible access to this proposed development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use.</p> <p>Traffic- 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape - This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP.</p> <p>Environment - The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>Infrastructure / Services:- Schooling - Already local schools are at or near capacity with inadequate parking and congestion. Local Services - We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be within easy walking distance from the houses proposed. All journeys will add to traffic problems.</p> <p>Please note :- In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan. In 2008 Neath Port Talbot County Council protected this site from development. In August 2009, the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. In December 2010, the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive. In October 2012 a further 300+ objections were made to Candidate site H1/8. This is the same site, but just a different number.</p> <p>All those previous objections must be carried over and considered in this case. I do not wish to complete the Deposit LDP form. This proposal is unsound. This letter is my objection and is to be counted</p>	
Dep155	Mrs Susan E Rosser		339758	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep192	Mr		339759	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	Matthew J Rosser					Park Extension
Dep148	PA Lewis		339762	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep133	Mr RA Collyer		339801	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep130	Mrs SM Collyer		339803	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep127	Mrs Carol Evans		339809	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep151	Mrs Sandra Chapman		339811	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep146	Mr John Chapman		339813	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep129	Mrs LL George		339822	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep138	Ms Valerie P H Mortimer		342988	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep220	Mr Michael McNicholas		342996	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep150	Mrs J A Thomas		346576	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep149	Mr Jeffrey L Thomas		346579	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep203	Mrs Valerie Griffiths		346663	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep246	Mr N D Jenks		346989	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep243	Mrs		346992	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Karen Jenks					Park Extension
Dep249	Mr Gareth Jenks		346993	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep137	Ms Lynne Morgan		471859	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep248	T J Steer		472496	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep250	M J Steer		472497	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep256	Mr Ryan Evans		472954	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep258	Miss Rhian Evans		472957	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep259	Mr Stephen Evans		472961	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep161	Mr Neil Lahiff		473262	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep229	Mr James Baker		475012	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep213	Mrs P M Phillips		475198	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep242	Dr Rena Lewis		475199	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep200	Mrs R M Davies		475230	Object	<p>H1/2 Standard Letter Version 6</p> <p><u>Letter Version 6</u></p> <p>I wish to once again register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:</p> <p>Removal of Land from the Green Wedge : This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area. It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access : There is no sensible access to this development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width must seriously be taken into consideration.</p> <p>Traffic : 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape : This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP .</p> <p>Environment : The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan .</p> <p>Infrastructure / Services :</p> <p>Schooling: Already local schools are at or near capacity with inadequate parking and congestion.</p> <p>Local Services: We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be in easy walking distance from the houses proposed and a playground further. All journeys will add to traffic problems.</p> <p>Please note:</p> <p>In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan.</p> <p>In 2008 Neath Port Talbot County Council protected this site from development.</p> <p>In August 2009 , the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park.</p> <p>In December 2010 , the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive.</p> <p>In October 2012 a further 300+ objections were made to Candidate site H1/8 . This is the same site, but just a different number. All those objections must be carried over and considered in this case.</p>	
Dep179	Mrs P G		477094	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

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	Gavin					
Dep178	J Gavin		478101	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep234	Margaret Thomas		478106	Object	H1/2 Standard Letter Version 1 with the following additional wording: Very concerned what the effect of possibly 200 or more cars trying to gain access to roads - BIG PROBLEM AT PRESENT	H1/2 Leiros Park Extension
Dep144	Mr Ronald Lewis		478271	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep152	Mr Graham Sinclair		692571	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep139	Mr W J John		693052	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep141	Mrs J John		693075	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep241	Neyton Family		693235	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep184	Mr G Maddick		709510	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep128	Ms Sian Griffiths		781384	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep131	Mr William George		781402	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep142	F.H Mortimer		781408	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep136	Mrs M Davies		781410	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep140	Mr Peter Morgan		781421	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep143	Ms Elaine Millan		781452	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep147	Ms		781610	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	Christine Williams					Park Extension
Dep156	Mr Chris Hughes		781827	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep157	Ms Angela Cann		781829	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep158	T J Gilson		781832	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep159	Ms Joan Cartwright		781840	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep167	Mr Robert Mogford		782010	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep166	Mrs Heather Mogford		782011	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep171	Mr J.V. Evans		782012	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep172	Leighton & Rachel Evans		782013	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep169	Mr D. Gorman		782015	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep177	J.W. Matthewson		782406	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep175	Mrs Sally Davies		782408	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep176	Mr Greg Davies		782409	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep180	Ms Aimee Williams		782418	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep181	Mr Michael Barrett		782419	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep183	R.M Maddick		782425	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep186	Mr Christopher L Harry		782436	Object	H1/2 Standard Letter Version 1 with the following additional wording: All those objections must be carried over and considered in this case. I do not wish to complete the Deposit LDP Representation Form. This proposal is unsound. This letter is my objection and is to be counted.	H1/2 Leiros Park Extension
Dep191	D T A Randall		782452	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep196	Mr Greg Harry		782539	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep197	Mr Andrea Harry		782541	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep194	D.G & A. Edwards		782546	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep209	Mr Kenneth T. Rouse		782789	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep206	Ms Myra Jenkins		782793	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep205	Mr & Mrs A.J. Wilsher		782794	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep208	Mr Gareth Griffiths		782814	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep207	Mr William M James		782820	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep211	Mrs Shirley A James		782822	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep215	Mrs C Gilmore		782824	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep214	Mr Kenneth Gilmore		782825	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep217	Mr and Mrs		782854	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

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	R and L Davies					Park Extension
Dep221	VM and VG Rosser		782887	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep222	Mr and Mrs L. P Lahiff		783013	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep236	Mr & Mrs Stephen Jones		783457	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep232	Mr Royston Mansel Thomas		783458	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep233	G. Lahiff		783459	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep245	M.J Sparkes		783664	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep251	Mr Mark Harris		783807	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep252	Ms Nicola Harris		783809	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep254	Ms Emily Harris		783810	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep255	Mr & Mrs Trefor and Annette Beasley		783813	Object	H1/2 Standard Letter Version 6	H1/2 Leiros Park Extension
Dep199	Mr Richard Price		792552	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep267	Mrs Katy Davies		328335	Object	<p>I am writing with regard to the inclusion of the H1/2 Candidate Site at Leiros Parc in the Local Development Plan.</p> <p>For the third time since 2008, I wish to once again register my objection to the inclusion of site H1/2 Leiros Parc in the LDP for change to residential use.</p> <p>My objection is based upon the following concerns:-</p> <p>1. Removal of land from the green wedge : This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land in protecting the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area.</p> <p>It is inappropriate to change the Green Wedge status of this candidate site.</p> <p>2. Landscape . This site is elevated above 99m. It cannot be well hidden and will dominate the views from the surrounding area. Ms Holland clearly documented this in her concluding report in 2006. The development would be contrary to Policy ENV 3 of the UDP.</p> <p>3. Traffic . 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465. The Council has measures in place to promote public transport, reduce the use of cars and to encourage walking and cycling. The proposed development, due to its topography above 90m, would not lend itself to cycling and walking.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>4. Environment : This candidate site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>5. Access : There is no sensible access to this development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use. Currently the local bus service has ceased using Daphne road due to its gradient.</p> <p>Please note:- In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan.</p> <p>In 2008 Neath Port Talbot County Council protected this site from development.</p> <p>In August 2009 , the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. This is the same site, but just a different number. All those objections must be carried over and considered in this case.</p> <p>In December 2010 , the Welsh ASSEMBLY Inspector rejected an access road between 39 and 50 Leiros Parc Drive.</p> <p>In October 2012 a further 300+ objections were made to Candidate site H1/8. This is the same site, but just a different number.</p> <p>Lastly, I raise the issue of your newly introduced Deposit LDP Representation Forms. I question the fairness of this form. The language and jargon in this form makes it very difficult for the general public to understand, let alone attempt to complete one to express their views. It is if, the Council is making it very difficult for the lay person to object to your plans!</p> <p>I EXPECT this letter to be noted as my Objection. Based on the points raised in this letter and previous rejections by Welsh Assembly Inspectors I find the plan to develop at Leiros Parc Unsound . I await confirmation from you that this letter is noted as an objection to these amended plans.</p>	
Dep266	Dr Alun S Davies		332421	Object	I am writing with regard to the inclusion of the H1/2 Candidate Site at Leiros Parc in the Local Development Plan.	H1/2 Leiros Park Extension

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					<p>For the third time since 2008, I wish to once again register my objection to the inclusion of site H1/2 Leiros Parc in the LDP for change to residential use.</p> <p>My objection is based upon the following concerns:-</p> <p>1. Removal of land from the green wedge : This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land in protecting the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area.</p> <p>It is inappropriate to change the Green Wedge status of this candidate site.</p> <p>2. Landscape . This site is elevated above 99m. It cannot be well hidden and will dominate the views from the surrounding area. Ms Holland clearly documented this in her concluding report in 2006. The development would be contrary to Policy ENV 3 of the UDP.</p> <p>3. Traffic . 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465. The Council has measures in place to promote public transport, reduce the use of cars and to encourage walking and cycling. The proposed development, due to its topography above 90m, would not lend itself to cycling and walking.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>4. Environment : This candidate site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>5. Access : There is no sensible access to this development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use. Currently the local bus service has ceased using Daphne road due to its gradient.</p> <p>Please note:-</p> <p>In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan.</p> <p>In 2008 Neath Port Talbot County Council protected this site from development.</p> <p>In August 2009 , the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. This is the same site, but just a different number. All those objections must be carried over and considered in this case.</p> <p>In December 2010 , the Welsh ASSEMBLY Inspector rejected an access road between 39 and 50 Leiros Parc Drive.</p> <p>In October 2012 a further 300+ objections were made to Candidate site H1/8. This is the same site, but just a different number.</p> <p>Lastly, I raise the issue of your newly introduced Deposit LDP Representation Forms. I question the fairness of this form. The language and jargon in this form makes it very difficult for the general public to understand, let alone attempt to complete one to</p>	

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					express their views. It is if, the Council is making it very difficult for the lay person to object to your plans! I EXPECT this letter to be noted as my Objection. Based on the points raised in this letter and previous rejections by Welsh Assembly Inspectors I find the plan to develop at Leiros Parc Unsound . I await confirmation from you that this letter is noted as an objection to these amended plans.	
Dep339	Mrs G.P. Thurlow		333089	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep293	Mr P Higgs		334194	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep300	Mrs VJ Higgs		334196	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep294	Mr Paul Rees		334265	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep295	Mrs Helen Rees		334266	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep418	Mr & Mrs JC Jones		334277	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep338	L A Morgan		334628	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep336	S P Morgan		334632	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep337	D A Morgan		334636	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep332	Mrs CA Hanford		335132	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep274	Mrs K M Grey		335136	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep282	Mr Michael Davis		335137	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep283	Mrs Lynne Davis		335141	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep424	Mr Ray Thomas		335338	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep306	Mrs C Morgan		335929	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep301	Mr J Morgan		335938	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep363	Mrs J Jones		336022	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep364	Mr D P Jones		336024	Object	H1/2 Standard Letter version 1	H1/2 Leiros Park Extension
Dep368	Mr Glyndwr Rees		336109	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep314	Mr L K Davies		336117	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep315	Mrs C A Davies		336118	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep365	S Tanner		338820	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep366	R Ostrom		338895	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep415	Veryan Walters		339766	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep414	Mr Adrian Walters		339767	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep412	Mr Tom Walters		339791	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep409	B Shufflebotham		342953	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep411	E J Randall		342955	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep423	Mr		342964	Object	H1/2 Standard Letter Version 1	H1/2 Leiros

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Clive Morris					Park Extension
Dep426	Mrs Cheryl Owen		342965	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep428	Mr David Owen		342966	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep346	Mrs Ruth Evans		342969	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep296	Mrs Amanda Drinkwater		343002	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep345	Mr Gareth Evans		343679	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep292	Mr Jon Drinkwater		343680	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep360	Dr Pramed Devichand		345053	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep362	Dr Neena Devichand		345054	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep269	Mr Thomas Andrew Jones		345055	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep268	Mrs Deborah Jones		345056	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep321	Mrs Margaret M Bevan		347396	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep290	Ms Linda Gerring		364537	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep331	Mr Hywel W Morgan		472713	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep417	Mr E Thomas		474032	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep324	A R Walters		478048	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep323	M Walters		478050	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep354	WH Jones		478174	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep349	Mr Andrew John Turner		478637	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep422	Mr Graham Thomas		692498	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep371	Mr SJ Cullen		694010	Object	<p>H1/2 Standard Letter Version 7 plus the following additional comments:</p> <p>I have read the Strategic Housing Site Assessment Report paying particular attention to Page 37 through to Page 45-4.1.7 Leiros Parc Extension, Bryncoch.</p> <p>After having read the Councils responses to the Residents comments there is nothing to allay my concerns over my original Objections.</p> <p>Therefore I have no alternative but to re-iterate my original objections as there has been no significant positive responses made by the Council.</p> <p>I have attached my original objections:</p> <p>I wish to once again register my opposition to the inclusion of H1/8 Leiros Parc site (candidate site N64 and N55) in the LDP for change to residential use. My objection is based on the following concerns:-</p> <p>Removal of Land from the Green Wedge . This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area.</p> <p>It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Landscape . This site is elevated above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her concluding report in 2006.</p> <p>Traffic . 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council has measures in place to promote public transport, reduce the use of cars and to encourage walking and cycling. The proposed development, due to its topography above 90m, would not lend itself to cycling or walking. It would not be suitable for the elderly or young families.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Environment . This site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of <i>** numerous species **</i>, many of which are protected under the Borough's Biodiversity Action Plan.</p> <p>Infrastructure/Services</p> <p>Water Supply. The water pressure to Swallow Tree Close regularly drops below the recommended legal pressure level. Houses built higher than 90m will have poor water pressure.</p> <p>Schooling. Already local schools are at or near capacity with inadequate parking and congestion.</p> <p>Local Services. We have no doctor's surgery, no dentist and no pharmacy locally. The village shop is 1km from the houses proposed and a playground further. All journeys add to traffic problems.</p> <p>Please note-</p> <p>In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan.</p> <p>In 2008 Neath Port Talbot County Council protected this site from development.</p> <p>In August 2009 the Candidate Sites N64 and N55 received over 800 objections to development at Leiros Parc. This is the same site but just a different number. All those objections must be carried over and considered in this case.</p>	
Dep416	Mrs Marjory Cooper		708779	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep285	Mr LBA Butland		709529	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep370	Mrs Mary Gaskins		709536	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep344	Ms Lisa Thorne		709539	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep262	Miss Olivia Jane McAlister		709702	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep261	Mrs Gail Beverly McAlister		709706	Object	<p>H1/2 Standard Letter Version 5</p> <p><u>Letter Version 5</u></p> <p>I wish to register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:-</p> <p>Removal of Land from the Green Wedge - This site was included by NPT Council as Green wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area. It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access - There is no sensible access to this proposed development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use.</p> <p>Traffic- 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465. The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill. The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape - This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP.</p> <p>Environment - The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of a wide variety of wildlife and a number of protected species. Many are protected under the Borough's Biodiversity Action Plan.</p> <p>Infrastructure / Services:- Schooling - Already local schools are at or near capacity with inadequate parking and congestion. Local Services - We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be in easy walking distance from the houses proposed and a playground further. All journeys will add to traffic problems.</p> <p>Please note :- In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan. In 2008 Neath Port Talbot County Council protected this site from development. In August 2009, the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. In December 2010, the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive. In October 2012 a further 300+ objections were made to Candidate site H1/8. This is the same site, but just a different number.</p> <p>All those objections must be carried over and considered in this case.</p>	H1/2 Leiros Park Extension
Dep260	Mr Robert Mc Alister		783834	Object	<p>H1/2 Standard Letter Version 1 with the following additional wording:</p> <p>Communications with Welsh Government Re presenting this proposal - despite numerous official rejections in the past is in itself</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					grounds for an Inquiry which I am now going to ask the Welsh Government to commence - who or what is the momentum for this flagrant abuse and repetition?	
Dep291	Mr Michael Howells Ford		784454	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep287	Mrs Josie Ford		784455	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep302	Ms Carole Wilkinson		784457	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep303	Mr Kenneth Jones		784459	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep320	Ms Gwenda Phillips		784460	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep317	Mr Anthony Phillips		784461	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep305	Mrs Ann Rees		784462	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep322	W Bevan		784463	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep286	C.G. Lewis		784464	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep289	G.M. Lewis		784466	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep308	Mr Hywel Rees		784467	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep310	W.D Watkins		784468	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep311	P Watkins		784469	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep316	Mr Jonathan Walsh		784470	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep318	Mr James		784472	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Walsh					
Dep319	Ms Karen Walsh		784473	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep333	Mr Joseph Andrews		784551	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep334	Julian and Sara Jones		784554	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep335	Mr Clive Davies		784556	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep325	Ms Tanya Purcell		784558	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep329	B G Kneath		784559	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep328	Lesley Williams		784560	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep327	Ms Lisa Williams		784563	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep326	Laela Melhas		784564	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep330	G J Blight		784571	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep340	Mr William Howard James		784609	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep358	S. Tucker		784989	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep356	Mr Nigel Tucker		784990	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep350	T.T. Jones		784991	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep353	L. Watkins		784992	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep347	W. Mort		784993	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep351	Mr Carlton Jones		784994	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep352	Ms Amanda Jones		784996	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep355	Mr Brian Freeman		784997	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep359	D Price		785002	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep361	T Price		785003	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep369	Mr Christopher Watkins		785134	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep373	Mr Ian Bennett		785151	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep372	E.K. Rees		785152	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep413	Mr and Mrs E Jones		785643	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep420	Kenneth and Pamela Thomas		785733	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep425	Mrs Mary Jean Martin		785788	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep427	Mr Jeffrey Martin		785789	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep434	Mr Richard Davies		785950	Object	<p>The proposed development is located towards the top of a mountainside. It will be clearly visible from many local vantage points. This is not acceptable. It is not a suitable location for development.</p> <p>The area has a number of well used footpaths that provide very good views of Neath town centre, the valley and out towards the sea. These views will be lost. The council say that buffer zones and sympathetic layout should be used to protect the views. This will not be possible in my opinion.</p> <p>These points were well made and accepted in the 2006 public enquiry. The council say that the removal of part of the site (N55) reduces the visual impact. This is not the case. The N55 section of land was generally the lower lying areas. Therefore there is basically no change to the visual impact already rejected.</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					The council say that similar development has occurred on other mountainsides above Neath. Setting a precedent. Previous inappropriate building should not be used to justify further inappropriate building.	
Dep435	Mr Richard Davies		785950	Object	<p>The additional traffic generated by the proposed development will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road & Cadoxton Road. The traffic assessment conducted shows this junction approaching & over capacity in the future even with the proposed highway improvements. How is this sustainable planning ? The highway improvements are required without the development to achieve an improved condition.</p> <p>Access onto Penywern Road from the existing estate is already difficult at peak times. The council mentions minor alterations to junctions onto Penywern Road. I cannot image anything short of traffic lights having any significant positive effect.</p> <p>Neath Abbey Road leading to the A465 experiences major congestions at peak times. This condition will deteriorate further. This does not appear in the Traffic Assessment. I note with interest that one of the reasons for rejection of Cimla based development is the traffic affect at the traffic light junction close to Victoria Gardens. Consideration of effect some distance away from the development is given. For the Leiros Park proposed development, only very local consideration has been made.</p>	H1/2 Leiros Park Extension
Dep436	Mr Richard Davies		785950	Object	<p>There is no sensible access to this development. An application for access between Nos. 39 & 50 Leiros Park Drive was rejected by both the council and the assembly inspector in December 2010. What has changed ? The access condition is the same. The goal posts have been moved ?</p> <p>The use of Daphne Road as an access road is no good. The width of the road is narrow towards it's top end. Any cars parked on the road now makes access difficult for the current residents. The future condition if the proposed development goes ahead will be significantly worse. I note one of the reasons for the rejection of the Tudor Inn site in Cimla is for a narrow road as access. Please compare Daphne Road and the Tudor Inn access road for suitability.</p> <p>One reason given for dropping the N55 section of this development is that Gilfach Road is not a suitable access road. Please explain the difference between Daphne Road & Gilfach Road as access roads?</p> <p>Is it planned to introduce traffic calming measures on Leiros Park Drive ? I have traffic safety concerns with the level and speed of traffic on this road if the proposed development goes ahead.</p>	H1/2 Leiros Park Extension
Dep437	Mr Richard Davies		785950	Object	<p>The opening council statement for this site says "The proposed development allows for the managed expansion of the urban area in a sustainable location with good access to both Neath Town Centre and the more local facilities and services on offer in Bryncoch"</p> <p>Although geographically close to the Neath town centre access by foot or cycling will not be chosen or possible for the vast majority of residents due to the very long steep gradients. The estate on-site public transport is very poor. The council propose the use of Penywern Road public transport. Again not possible due to the hill. Therefore almost 100% of journeys to the town centre will be by car. Car dependence was given as one of the reasons to reject quite a few sites. Not consistent.</p> <p>Facilities & services on offer in Bryncoch. Today I measured the distances from the top of Leiros Park Drive (as of today) to some of these facilities :-</p> <p>Caewern shops - 0.6 miles</p> <p>Waunceirch shops - 0.8 miles</p> <p>Bryncoch pub - 0.7 miles</p> <p>Bryncoch post office - 1.0 miles</p> <p>Bryncoch shops - 1.2 miles</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>All with the long steep hill.</p> <p>The Institute of Highways and Transport Guidelines for providing for journeys of foot identifies that 400m is desirable and 800m acceptable (allowing for topography).</p> <p>I will accept that the above distances will be reduced from the western edges of the new site by using the canal footpath & using Gilfach Road into the centre of Bryncoch (pub, Post Office & Bryncoch shops). The Caewern & Waunceirch shops have no improvement.</p> <p>Therefore I claim a clear failure against these guidelines. Therefore almost 100% of journeys to these Bryncoch facilities will be by car. Car dependence was given as one of the reasons to reject quite a few sites. Not consistent.</p>	
Dep438	Mr Richard Davies		785950	Object	<p>This area is part of a green wedge.</p> <p>The site assessment report states that the integrity of the designation will not be unduly undermined by development in this location.</p> <p>I disagree. Any erosion of the green wedge is unacceptable.</p> <p>Development should be restricted to brownfield sites. There are significant sites available.</p> <p>Once our green fields are gone , they will not be coming back.</p>	H1/2 Leiros Park Extension
Dep439	Mr Richard Davies		785950	Object	<p>Please consider :-</p> <p>Bwlch Road, Cimla site. 10.1ha. Site rejected. One of the reasons given :- The loss of significant areas of open countryside resulting in the loss of habitats and species.</p> <p>Bryncoch Farm, Bryncoch. 10.73ha. Site rejected. One of the reasons given :- The loss of significant areas of open countryside resulting in the loss of habitats and species.</p> <p>Leiros Park Extension. 12.2ha. The site has been reduced from 19.4ha to 12.2ha. What more do you want ? Site approved. A flippant remark but makes my point.</p> <p>The council appear to use repeated 'cut and paste' comments to suit their already made decision. There is inconsistency within reasons given to proceed and reject a site.</p>	H1/2 Leiros Park Extension
Dep479	Mr Richard Davies		785950	Object	<p>A flexibility allowance of 1,008 houses has been added. An allowance for vacancies and sites not coming forward as anticipated. I could not find a statement of how much of this allowance was for each item or any justifiable evidence. A 13% allowance is very large.</p> <p>The council should not be planning for vacant properties!</p> <p>If the council site assessment is so robust, there should be little chance of sites not coming forward.</p> <p>The New Allocation of greenfield sites in Neath adds to 817. The New Allocation of greenfields sites in Port Talbot adds to 241 A total of 1058.</p> <p>Objective 15 - ensuring that developments throughout the County Borough respect all landscapes and minimise adverse impacts. Please minimise adverse impacts by not planning for failure. Please remove this allowance and take the new greenfield</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					allocations away.	
Dep487	Mr Richard Davies		785950	Object	<p>For the plan to be sound and robust there should be evidence of the financial viability of a site. I have found no evidence presented.</p> <p>Developer contributions / costs affected by :-</p> <ol style="list-style-type: none"> 1) Appropriate mitigation for biodiversity / habitat loss. 2) The site offers the potential to make contributions for the enhancement of existing or provision of new facilities on site. 3) Highway improvements - Required. Dual carriageway plus junction improvements. 4) Water supply - Offsite improvements to the water main will be required. 5) Sewerage - The local sewer network is currently considered too small to accommodate the foul flows from this development. Improvement work will be required. 6) Education provision - Additional school accommodation for English Primary schools. For Welsh, a re-designation of an English school is required. 7) Health care - The local health board has indicated that there are capacity issues in Neath. 8) Surface water - A comprehensive surface water drainage system incorporating SuDS would need to be submitted. 9) Contamination - Further study and appropriate action required. 10) Archaeology - Further study and appropriate action required. 11) 20% of site to be affordable homes. 12) Single storey homes on elevated areas. <p>Is it possible to fund the above from 200 homes including single storey & affordable homes ?</p>	H1/2 Leiros Park Extension
Dep523	Mr Richard Davies		785950	Object	<p>The housing plan only shows flexibility in the upward direction. The council has based the LDP on an economic led plan. Over 15 years the economy cannot be predicted with any certainty.</p> <p>Therefore for any plan to be sound it must have a + & - tolerance.</p> <p>A plan with positive tolerance only cannot be logical & therefore sound.</p> <p>Please change the plan to have positive & negative tolerance on economic growth & consequently house growth.</p>	H1/2 Leiros Park Extension
Dep476	Mr Richard Davies		785950	Object	<p>Objective 17 states - Promote the efficient use of land.</p> <p>The housing policy (5.1.14) states - the efficient use of land is an important element of the LDP strategy, it is a scarce resource which has to be utilised effectively and in a sustainable manner the council's assessment of an appropriate number of units, based on 35 dwellings per hectare in the urban areas.</p> <p>H1/2 site is 200 houses in 12.2ha. This is an average of 16.4 houses per ha. Less than half the urban value. The council criteria is far from achieved.</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Objective 15 ensuring that developments throughout the County Borough respect all landscapes and minimise adverse impacts. In the case of the Leiros Park extension site the greenfields will be sacrificed for limited benefit in terms of house numbers achieved.</p> <p>Please develop brownfield sites. I note site H1/LB/5 Coed Darcy Urban Village has 2150 houses on 248.1 ha. 8.66 houses per ha. I guess the 2150 will be increased after the plan period. Please make it 2350 now and delete the H1/2 site.</p>	
Dep516	Mr Frank Little		786306	Object	I believe the Leiros Park extension (H1/2 on map 29) is wrong on two counts. It would remove a green area in an area which is already well built up. It also would "harden" an area which currently acts as a natural sponge absorbing surface water. Putting an impervious surface here would increase the risk of flooding in the parts of Cadoxton below the proposed extension. Cadoxton already suffers from two- or three-yearly floods because of its outdated and deteriorating Victorian drains.	H1/2 Leiros Park Extension
Dep341	C Davies		789385	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep941	Mr RGM Winfield		333093	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1006	Mrs Elizabeth Winfield		333094	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1168	Mrs Patricia Thomas		334259	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1112	Mrs KA Davies		335151	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep939	Mr Phillip Parry		335159	Object	H1/2 Standard Letters Version 1 & Version 7	H1/2 Leiros Park Extension
Dep1135	Mr Harold Crook		335384	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1140	Mrs GV Jenkins		335400	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1151	Mark Davies		336028	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep954	Mr W R Bugler		336042	Object	<p>H1/2 Standard Letter Version 1 (with the following additional wording) & Version 7.</p> <p>Please ensure that the previous correspondence I have had with you (copies attached), which are entirely relevant, are placed before the Council Committee concerned.</p>	H1/2 Leiros Park Extension
Dep1138	Mr and Mrs D & N Jones		336125	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1058	Mrs		336127	Object	H1/2 Standard Letter Version 7	H1/2 Leiros

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	E Dyer					Park Extension
Dep938	Mr William Gareth Morgan		336136	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep1146	Mr Richard Toombs		337444	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1128	Ms Margaret Pile		338794	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1184	Mrs G Davies		338801	Object	H1/2 Standard letter Version 7	H1/2 Leiros Park Extension
Dep986	S Hopkins		338811	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep988	Mrs Sharon Davies		338816	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1236	Mr & Mrs Russell and Margaret Thatcher		338870	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep869	Mr & Mrs A K Jones		338898	Object	<p>We wish to object to the proposal to build 200 houses on the edge of Leiros Parc.</p> <p>Our reasons are as follows:</p> <p>The infrastructure is inadequate for such a development. 200 houses means an extra 400 cars.</p> <p>This extra traffic would need to travel through the site at Leiros Parc. This would put an intolerable extra load on the existing roads, and increase the danger to existing inhabitants of Leiros Parc.</p> <p>The roads at Pen-y-Wern and Neath Abbey Road are already very congested for long periods of the day, this extra load would bring traffic to a halt.</p> <p>There is inadequate provision for extra schooling and play areas in the vicinity.</p> <p>ACCESS there is no sensible access to this proposed development. An application for access between Nos 39 and 50 Leiros Parc Drive was rejected by both the council and the assembly inspector in December 2010. Road safety concerns raised at earlier phases have not been answered.</p> <p>POSITION although geographically close to Neath town centre, access by foot or bicycle will not be chosen/possible for the vast majority of residents due to the very long steep gradients. Use of Penywern Road public transport as suggested in the site assessment is not appropriate due to the elevated site location.</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>GREEN WEDGE the area is part of a green wedge, and any erosion of this is unacceptable.</p> <p>LANDSCAPE the site is above 90m, it cannot be well hidden and will dominate views from the surrounding areas. The Welsh Assembly Inspector clearly documented this in her 2006 report.</p> <p>ENVIRONMENT these fields have significant wildlife.</p> <p>FINANCIAL VIABILITY developer contributions are required for upgrades of highways, water & sewage, education & health, facilities on site or in Bryncoch. No evidence has been provided to show that the site is commercially viable.</p>	
Dep1182	Mrs Lillian Rees		338914	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1166	Mr L G James		338916	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1155	Ms Rita Charlton		338930	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1157	Mrs Gwyneth Anthony		338933	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1156	Mr John Anthony		338935	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1037	Mr & Mrs Colin and Christine Bail		338956	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1147	Mr BV Nabar		339000	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1196	Mrs Mavis Williams		339024	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1191	Mr Neil Aggett		339025	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1195	Mr HL Williams		339030	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1094	Mr D Aplin		339754	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1222	Miss R Jenkins		339870	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1225	Mrs YM Jenkins		341297	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1079	Mrs Joan Elizabeth Peet		342944	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1081	Mrs Carolyn Jones		342948	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1148	Mr Henry Macmillan		342971	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1136	Rev & Mrs DG Rees		342979	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1091	B F Fussell		342992	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep956	Mr Martin Davies		469439	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep879	Mr Terry Griffiths		472569	Object	<p>I believe this proposed development to be ill conceived and seriously flawed. A section of the LDP states the need to create sustainable communities yet this location is anything but, being at an elevation which will encourage further car use as anyone in the locality will point out.</p> <p>It is also a further undesirable intrusion into the green wedge and was rejected by the inspector at the previous UDP inquiry for a number of reasons including biodiversity concerns and the serious detrimental effect the development would have on the public rights of way which have especially excellent views over the lower Neath valley at this location.</p> <p>The traffic generated will feed on to Pen y Wern road which is already at maximum capacity at the mini roundabout where it joins Cadoxton Road.</p> <p>There are also concerns that the sewerage system is seriously overloaded with regular public complaints of foul smells in the railway bridge area on Cadoxton Road.</p> <p>I believe therefore that this proposed site should be removed from the Local Development Plan.</p>	H1/2 Leiros Park Extension
Dep859	Mr E Porter		473740	Object	<p>Opposition to Proposed Extension of Leros Park - Ref H1/2</p> <p>In 2006 the Welsh Assembly Inspector turned down this site as a possible site for housing. Why in 2013 is it being proposed again? What has changed?</p> <p>The traffic position has changed - it is now worse. The other items mentioned in the report have not changed - there will still be a</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>significant impact on the wildlife of the area - what happened to the Council's Biodiversity Plan? The Green Wedge - any erosion of the Green Wedge is not acceptable and every effort should be made to redevelop brownfield sites such as the massive site in Llandarcy. Surely that site will cater for the required number of houses.</p> <p>One item which I have not seen mentioned is the history of coal mining in the area. Ask some of the older residents in the area and they may recall previous generations talking about the many coal workings on and around the proposed site. These workings were private workings and will not have been recorded. I myself remember large holes appearing in the fields and the farmer having to transport large quantities of material in to fill them in.</p> <p>I hope common sense will prevail and that this site will be turned down.</p>	
Dep909	Miss Bethan Jenkins AM		473974	Object	<p>Having spoken to a number of residents, a number of concerns have come to my attention:</p> <p>The lack of local healthcare facilities is acute in this area, with residents having to travel into Neath to access GP surgeries. This development, along with the proposed large development at Tonna, will push surgeries to bursting point.</p> <p>Will Daphne Road or Leiros Park drive be an access road to the new site? Both are very steep, and there have been issues with emergency services accessing houses as the top of the hills in winter already, with ice and snow making the hill very treacherous. The roads are also quite narrow, especially when there are cars on the hill. If these are to be the access roads for the new sites, what steps will be taken to mitigate the risk of this in future?</p> <p>There is an issue with traffic along Cadoxton Road and Neath Abbey Road. Do you intend to improve the infrastructure to lighten the traffic load, possibly by creating a new junction onto the A465?</p> <p>Many residents of Neath have remarked on the foul odour that emanates from the sewers near the railway bridge adjacent to Burger King on Neath Abbey Road. The sewers are already struggling to cope, how will they cope with the extra load from this development?</p>	H1/2 Leiros Park Extension
Dep883	Mr Paul L Harris		474016	Object	<p>I write to protest in the strongest possible terms against the Council's current plan for the proposed development of 200 new housing units in the Leiros Park area of Bryncoch. As I am sure many will have pointed out already, this does not have the support of local residents and no reasonable case can be made for the development on economic grounds. It would appear not to be commercially viable if developers are required to contribute in the normal way unless shortcuts are found which would be to the detriment of the whole community round about. The position is completely unacceptable with regard to so many different factors such as transportation, access, location and overall impact on the environment. The particular problem with traffic congestion and safety is of enormous significance as the development, should it go ahead, would add considerably to the difficulties of peak hour traffic management. There would appear to be significant problems also in terms of capacity whether thinking of schooling or the sewerage system.</p> <p>The council, in planning this, has obviously ridden rough shod over local residents' concerns and seems to be oblivious, as on previous occasions, to the real problems of adding to the already stretched capacity of Penywern Road and Cadoxton Road intersection to say nothing of the other main routes linking with these from Caewern, Bryncoch and the Rhyddings. What is lacking in these proposals is an understanding that the development of housing on this green field site - in addition to all the other houses built in the area over the past two decades - is completely unnecessary and fraught with problems for the community while there are brown field sites in the general locality of the town which could and should be used for extra housing. If the council were to go ahead it would be in contravention to its own biodiversity action plan and would be responsible for ruining a green wedge site used and appreciated by people already living in the vicinity with a lamentable disregard of the common sense views and cogently argued criticisms of locals who view with grave displeasure this most outrageous development. Such wilful ignoring of neighbourhood concerns and the much more fundamental safety and accessibility issues will-if not stopped -regrettably lead to a short-sighted project many locals, and others who pass through the area, will come to regret for its very negative consequences having an impact</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					on a wider area. Therefore, I and many elderly folk who live nearby (some of whom are not able to write their own letter) wish to register out protest at this proposed development and urge the Council to re-consider this ill-thought-out project before it is too later and too much damage is done.	
Dep945	Mrs Marilyn John		474043	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep946	Mrs Dolores Beasley		474093	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep873	Mrs Mavis Hewitt	Blaenhonddan Community Council	474834	Object	This application represents the views of the 18 Members of Blaenhonddan Community Council. The Council is of the view that the two residential sites ref H1/1 and H1/2 fail the tests of soundness relating to C1 and CE2 and CE3 detailed above. The Policy SP20 in statements 6 and 7 clearly state the Authority will restrict development which would have an unacceptable impact on highway safety and require development proposals to be designed to provide safe and efficient access. The Council is of the view that the sites do not comply with such policies. In relation to Policy EN3 Green Wedges - SC1 "to restrict development outside settlement limits" and "To restrict inappropriate development within green wedge areas. The Council is of the view that the site H1/2 does not comply with such policies.	H1/2 Leiros Park Extension
Dep942	Mr Graham Lewis		476112	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep952	O Harding		477487	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep949	Mrs Margaret Davies		693043	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep944	Mr & Mrs Hywel and Ann Rees		693083	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep950	Mr P Britton		707384	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep867	Mr Caleb Harris		786644	Object	I am writing to you to express my support for the rejection for the proposed extension of Leiros Park, Bryncoch (Site Reference H1/2). I feel that the proposed building of 200 new housing units is wrong, and the plan put forward should be scrapped. In this letter I hope to outline my points of disagreement with this project. Firstly, I would like to point out the issue of the increase in traffic that would be caused. The new housing will cause severe traffic problems for Penywern Road. There is no justification for adding new vehicles to a road which is already struggling to cope with the traffic it has. How can this be a sustainable project when it will create further issues for the region? I am confident that increasing congestion on the roads will not be popular with the residents of this area. It will just cause problems for the people of Neath who will find themselves stuck in traffic jams because of the new cars brought in by the development. Following on from this, the idea that public transport, encouraging cycling and walking can be used to solve the problem and reduce congestion is wrong. The use of these methods which was suggested by the site assessment is not realistic. In reality, people will not	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>choose to walk or cycle due to the geographical location. In addition, due to the public transport service being quite limited, the use of cars to Bryncoch and Neath will become the main choice of transport for the residents of the new development.</p> <p>Furthermore, access to the new development has not been thought out in a realistic way. The application for access between Nos. 39 & 50 was rejected by the council and the assembly inspector. Gilfach Road and Daphne Road are both not acceptable as access points, since the roads are not designed to handle vast amounts of traffic. This also raises serious road safety concerns which in my view should cause a reconsideration of the project.</p> <p>Also, the area concerned is part of a Green Wedge. I don't think that the natural aspect of this area should be undermined by this project. The green wedge is important and any damage to this is certainly not acceptable. Brownfield sites should only be used for the development of which there are many available.</p> <p>I also believe that the project will be an eyesore for the many residents who will be living alongside this development. The site is above 90m which means that people will lose the views that the area provides. It will make the area unattractive and ruin the natural community atmosphere which exists in Leriros Park.</p> <p>Finally I would like to suggest that this project will come with significant costs. I believe that the project has to be commercially viable to work. This development I believe won't be viable. When you consider the cost of having to pay for upgrades in important areas like education, sewage etc. there is already a mounting cost that will impact this project's viability. I don't think in addition that the people of this area want the council to waste money on a project which is not supported by residents.</p> <p>I hope you will see my point of view on this project and the views of so many residents in this area. I also hope that before making any decision on the project, there will be careful consideration on the impacts of the people who will be living next to the development.</p>	
Dep868	Mrs Mair Webster		786646	Object	<p><u>OBJECTION TO H1/2 DEVELOPMENT - LEIROS PARK - 200 HOUSES</u></p> <p>Previously this development has been put forward and planning permission subsequently denied.</p> <p>There is an issue with the roads leading to Leriros Park - Cadoxton Road/Pen Y Wern Hill.</p> <p>A further 200 houses with even 1 car per family would add a further 200 cars to the transport system around the area. A number which is totally unsustainable.</p> <p>The volume of traffic has worsened considerably on these roads due to the building which has already taken place in Bryncoch. and Waunceirch.</p> <p>Llewellyn Avenue (of which I am a resident) also at certain times of the day becomes a short cut for traffic wishing to avoid the queue along Pen Y Wern and the roundabout at the bottom of the hill.</p> <p>I should therefore be grateful if you would note my objections accordingly.</p>	H1/2 Leriros Park Extension
Dep1093	Lee Davies		313035	Object	H1/2 Standard Letter Version 7	H1/2 Leriros Park Extension
Dep1224	Mr Dean Rigdon		344101	Object	H1/2 Standard Letter Version 7	H1/2 Leriros Park Extension
Dep1034	Mr Glyn		344102	Object	H1/2 Standard Letter Version 7	H1/2 Leriros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Williams					
Dep1149	Mrs E G Roberts		344127	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1021	Mr H L Roberts		344128	Object	<p>H1/2 Standard Letter Version 8</p> <p><u>Letter Version 8</u></p> <p>I wish to once again register my opposition to the inclusion of H1/2 Leiros Parc site in the LDP for change to residential use. My objection is based upon the following concerns:</p> <p>Removal of Land from the Green Wedge : This site was included by NPT Council as Green Wedge in the Unitary Development Plan in 2008. The Council reaffirmed that the fundamental role of Green Wedge Land is to protect the open character, environment and landscape areas considered important in forming the setting of, and preventing the coalescence of settlements. This decision was made after the Welsh Assembly Inspector Ms Susan Holland DELETED this site from the Unitary Development Plan in 2006. Ms Holland concluded that any development on these fields would have a materially harmful effect on the landscape, setting and ecology of the area. It is inappropriate to change the Green Wedge status of this site at Leiros Parc.</p> <p>Access : There is no sensible access to this proposed development. There is no access from Leiros Parc Drive. An application for access through 39 and 50 Leiros Parc Drive was rejected by both the Council and the Assembly Inspector Mr Ian Osbourne in December 2010. The steep gradient of Daphne Road and its width are not suitable for further expansion and use.</p> <p>Traffic : 200 more houses and subsequent cars will exacerbate the major congestion already experienced during peak times on the A474 at the junction of Penywern Road and Cadoxton Road, Neath and will have a knock on effect through the major junctions at Dwr-y-Felin Road, Neath Abbey and the A465.</p> <p>The Council also has measures in place to actively promote public transport, reduce the use of cars and to encourage walking and cycling. This development would not lend itself to cycling or walking. It would not be suitable for the elderly or young families due to the length and gradient of the hill.</p> <p>The Welsh Assembly Inspector Ms Susan Holland concluded in June 2006 that development on these fields would have extensive highway implications.</p> <p>Landscape : This site is above 90m. It cannot be well hidden and will dominate views from the surrounding area. Ms Holland clearly documented this in her report in 2006. Development would be contrary to Policy ENV3 of the UDP .</p> <p>Environment : The site is in the Green Wedge. These fields have significant wildlife. Development will undoubtedly threaten the differing habitats of Bats, Moles, Badgers, Foxes, Squirrels, Red Kites, Jays, Buzzards, Sparrow Hawks, Tawny Owls and Woodpeckers. Many are protected under the Borough's Biodiversity Action Plan .</p> <p>Infrastructure / Services :</p> <p>Schooling: Already local schools are at or near capacity with inadequate parking and congestion.</p> <p>Local Services: We have no doctor's surgery, no dentist and no pharmacy locally. The village shop will not be within easy walking distance from the houses proposed. All journeys will add to traffic problems.</p>	H1/2 Leiros Park Extension

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					<p>Please note:</p> <p>In 2006 the Welsh Assembly Inspector, Ms Susan Holland deleted this site from the Unitary Development Plan. In 2008 Neath Port Talbot County Council protected this site from development. In August 2009 , the Candidate sites N64 and N55 received over 800 objections to development at Leiros Park. In December 2010 , the Welsh Assembly Inspector rejected an access road between 39 and 50 Leiros Parc Drive-In October 2012 a further 300+ objections were made to Candidate site H1/8 . This is the same site, but just a different number.</p> <p>All those previous objections must be carried over and considered in this case. This proposal is unsound.</p>	
Dep1123	Mr RJ Ayre		344694	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1027	Mr Alan Doyle		345045	Object	H1/2 Standard letter Version 8	H1/2 Leiros Park Extension
Dep977	Mrs Valerie Doyle		345046	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep980	Mrs S J Heard		345057	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1134	Mr David Hill		345586	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1085	Mr Brian Williams		346420	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1142	Mr B Lewis		346968	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1114	Mrs M M Croft		346990	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep970	Mr Phillip Jones		347356	Object	<p>H1/2 Standard Letter Version 7 with the following additional comments:</p> <p>P.S I think you have forgotten that scheme has been turned down twice.</p>	H1/2 Leiros Park Extension
Dep1017	Mr David Winfield		347360	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1092	Mr Wayne Browning		347377	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

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Dep1154	Mrs Janet L Watkins		347400	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1097	Mrs Ruth Jenkins		347908	Object	H1/2 Standard Letter Version 7 with the following additional wording: The roads are log jammed as it is i.e. - how on earth can the area cope with more housing	H1/2 Leiros Park Extension
Dep1087	R Phillips		347926	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1169	W M Webber		347932	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1129	Mr Frederick James Hicks		347959	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1130	Mr Ian Davies		347987	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1150	Mrs A Griffiths		469442	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1198	Mr T C Jones		469949	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1206	Mrs J Davies		472213	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1171	Dr. RBD Skidmore		472405	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1125	Mrs Marjorie Williams		473241	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1131	Mr Andrew David		473470	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1107	Mr John Harris		473712	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1090	Mr R Jones		473733	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1003	Mrs		473737	Object	H1/2 Standard Letter Version 7	H1/2 Leiros

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Joanna Porter					Park Extension
Dep1088	Mrs Christine Newman		473753	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1002	Mr David G Jones		473779	Object	H1/2 Standard Letter Version 4	H1/2 Leiros Park Extension
Dep1127	Mrs M Whipp		474074	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1176	Emma Harris		474075	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1137	Mr VM Grant		474884	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1139	Mrs Melissa Powell		475417	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1174	Mrs Carol Davies		475524	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1132	Ms Andrea Griffiths		475822	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1145	Mrs. S.C. MacMillan		475835	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1143	Mrs Anne Parker		475858	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep974	Miss Gaynor Jones		476437	Object	<p>H1/2 Standard Letter Version 7 with the following additional wording:</p> <p>The traffic on Penywern Road is horrendous not only at peak times but all day and night. I have a newborn baby and the baby is constantly woken up by the traffic and the very noisy exhausts on motorbikes and cars. The speed restrictions are totally ignored. The lorries coming up and down the hill actually make the house vibrate. Penywern Road is not a nice place to live anymore. Financial restrictions mean I am unable to move.</p> <p>I strongly oppose the housing development. With houses having possibly two cars these days it could potentially mean 400 extra vehicles up and down the road. I can't cross the road with the pram now let alone all the extra vehicles on the road. This road surely is at capacity now. I would like to know if you could bring my concerns to traffic management department if there is such a thing. Something has to be done.</p>	H1/2 Leiros Park Extension
Dep1172	Mr		476443	Object	H1/2 Standard Letter Version 7	H1/2 Leiros

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	K Hunter					Park Extension
Dep1158	Mrs M A Patch		477007	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1194	Mr John Harris		477170	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1173	Mr Adrian Davies		478156	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1216	M. Rigdon		478995	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1218	K. Rigdon		478996	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1215	Mr David Rigdon		478997	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1043	Mr Keith Pugh		692122	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1111	J Evans & E Humble		692490	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1064	Mrs Dora George		692506	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1041	Mr Thomas J Fulford		692521	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1099	Mr & Mrs FH Mortimer		692567	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1084	Mrs R Jones		692656	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1164	Mr L Gilmore		692688	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1190	Mr & Mrs Alan & Olwen Davies		692739	Object	H1/2 Standard letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1080	Mrs Helen Mahon		692763	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep982	Mr & Mrs W L George		692769	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep994	Mr Philip Cook		693166	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1113	Mr J Kedward		693261	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1031	Mr Keith Hawkes		693266	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep983	Mrs Sarah Wilsher		707444	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1038	Mr M M Davies		708772	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1153	Mr Peter G Watkins		709124	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1000	Mrs Susan Richards		709169	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1105	FTC Davies		709232	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1110	W M Owen		709246	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1061	Mr S Mundy		709250	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1025	B E M Becker		709616	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1118	Mr and Mrs E Jones		785643	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1242	Mr Richard		785950	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Davies					
Dep1357	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	H1/2 Leiros Park Extension
Dep1315	Mr Ben	St. Modwen Developments Ltd	787655	Object	New Site Allocations	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Cook				<p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • Dwr Y Felin Lower School* / 100 / H1/5 • Neath Town Centre Redevelopment* / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>	
Dep951	V.L Hadley		788139	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep961	Ms Audrey Richards		788141	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep933	Mrs Natalie McCallion		788357	Object	<p>H1/2 Standard Letter Version 7 with the following additional wording:</p> <p>In addition to the oppositions raised in the enclosed letter, I'd like to inform you of further problems caused by traffic on Daphne Road. I believe Daphne Road requires a traffic monitoring system. I am 100% sure this will show you that drivers are not using due caution on the road. As stated, Daphne Road is very narrow with a steep gradient. Drivers of domestic vehicles, commercial vehicles and buses all drive very quickly down the road. We experience vibrations throughout our bungalow when the lorries carrying building materials hurtle down the hill. Unfortunately one of our cats was involved in a road accident and had to be euthanized</p>	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>earlier this year.</p> <p>I firmly believe that whether access via Daphne Road is granted to this site or not, Daphne Road is in desperate need of speed bumps or equivalent speed management system. This is imperative to secure the safety of all residents and animals living on the hill section of Daphne Road. Drivers travel very quickly down the hill and this accumulates at the bottle neck narrow corner where we reside. This has caused damage to our car, and there are daily episodes of breaks screeching and horns beeping. I am surprised I have not experienced a serious accident. People need to be made aware of the danger of speeding down the hill towards a narrow bottle neck and blind corner. This has been of concern to my husband and I for sometime, and the idea of 200+ cars behaving in the same way as the current drivers using the road is frankly frightening.</p> <p>I look forward to your response and thank you for your time.</p>	
Dep935	Mr Edward Lewis		788369	Object	H1/2 Standard Letter Version 1 & Version 7	H1/2 Leiros Park Extension
Dep1005	Mrs Claire Lewis		788371	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1009	Mr M D Thomas		788376	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1011	B C Atkinson		788384	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep943	Ms Olive Antolin		788386	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep947	Mrs Short		788390	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep948	Mr David Houston		788391	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1013	Dr DW Thomas		788393	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1015	Jill Thomas		788394	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep1019	Mrs CM Parry		788397	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep971	Mr Paul Regan		788400	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension
Dep992	Mr Paul		788400	Object	H1/2 Standard Letter Version 1	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Regan					
Dep959	Chris Powell		788401	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep958	Mr Phillip Ryan		788403	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep966	Mrs G Brown		788408	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep968	Ms Teresa Nicholas		788421	Object	H1/2 Standard Letter Version 7 with the following additional comments: As a resident living on the bottom of Penywern Road with 2 children who have to cross the road to walk to school, the traffic is extremely bad at the moment, it will get much worse, particularly as there is no crossing to get across the road, I am extremely worried for my children's safety crossing the road. I hope my concerns will be recognised.	H1/2 Leiros Park Extension
Dep985	Mr Josh Heard		788447	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep996	Mrs Gaynor Cook		788469	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1029	D.A and M.E Jones		788558	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1033	Mr Stephen Hughes		788560	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1035	Mr John Davies		788562	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1062	Mr and Mrs D Baker		788564	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1109	AJ Archibald		788635	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1076	I and J Lewis		788641	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1108	David and Christine Kissick		788643	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1115	Mrs Kerrie		788644	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Davies					
Dep1116	Mr DE Jenkins		788646	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1117	Mr Graham J Morris		788649	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1071	Margaret Lynne Owen		788650	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1104	Mr Andrew Lewis		788665	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1122	Ms Julie Battle		788671	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1095	Gary and Claire Michael		788673	Object	H1/2 Standard Letter Version 7 with the following additional comments: I would also like to know why NPTCBC continue to explore this planning option year upon year despite the reasons given overleaf. It is a waste of time and resources which the Council can ill-afford.	H1/2 Leiros Park Extension
Dep1126	Mr Richard Williams		788676	Object	H1/2 Standard letter Version 7	H1/2 Leiros Park Extension
Dep1096	S Hiscock		788680	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1098	Mr K Wheeler		788681	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1100	Ms Mair McNeil		788682	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1102	Mr David Loader		788684	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1120	T.E and J Smith		788685	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1121	P Thwaite		788686	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1152	J. Toombs		788688	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1162	C. Thomas		788689	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1163	Mrs A.E. Hinchliffe		788690	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1124	R Huxtable		788739	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1133	Mr Jack Davies		788741	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1165	Rikki Thomas		788742	Object	H1/2 Standard letter Version 7 with the following additional wording: I object to this proposed extension of Leiros.	H1/2 Leiros Park Extension
Dep1106	Mr D.O Davies		788743	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1119	NDJ Davies		788804	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1144	Ms Amanda Coombes		788880	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1141	Laura J Davies		788881	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1159	Mr and Mrs K.A Howe		788883	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1160	Ms Theresa Worth		788886	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1161	Mr and Mrs Haydn Price		788888	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1200	Ms Jennifer Williams		789216	Object	H1/2 Standard Letter Version 7 with the following additional wording: For once can NPT Council have the kahunahs to listen to its constituents instead of the 'kerching' of corporate sweeteners! It's the little people who put all the X's on the boxes!	H1/2 Leiros Park Extension
Dep1197	Mr Gareth Reilly		789217	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1193	Mr and Mrs Sian and Eamonn Davies		789220	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1192	D Matthews		789221	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1188	K.M Davies		789222	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1187	Mrs M Mumford		789223	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1186	Mr David Rees		789224	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1185	Mr David Bell		789225	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1183	Mr Stephen Lee		789226	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1181	Mrs Delyth Nia Davies		789228	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1179	Mr Neil Thomas		789229	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1199	H Williams		789235	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1178	Mr and Mrs P Mead		789238	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1177	N Jones		789239	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1201	D Thomas		789240	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1202	Samantha Hopkins		789242	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1203	Allan and Jackie Williams		789252	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1204	G Jones		789255	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1167	Mr & Mrs K.G. Trow		789256	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1207	Cheryl Thomas		789258	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1170	Ms Elizabeth Mair Reed		789259	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1208	Keiran Thomas		789260	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1175	Ms Gaynor Knight		789262	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1209	C Jenkins		789264	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1189	Mr & Mrs J.M. Moore		789265	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1205	Mr & Mrs A.R. Hutt		789301	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1211	Mr Meirion Morgan		789303	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1213	Leslie Stone		789306	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1217	Mr David Hughes		789309	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1220	Mr Richard Evans		789312	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1223	Mr Robert Francis		789315	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1227	Mr Alan Hughes		789325	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1221	Mr Jason Tucker		789332	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1219	Mr Darren Harvey		789333	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1228	Mr Simon Phillips		789334	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1214	T Rigdon		789335	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1212	Dr KE Smith		789347	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1210	J Regan		789349	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1226	K Hopkins		789350	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1229	Mr and Mrs J Morgan		789368	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1230	Mr and Mrs L.K and C.A Davies		789391	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1231	Mr and Mrs D Lewis		789392	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1232	Michael and Eirwen O'Hea		789395	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1233	Mr and Mrs B and S Bevan		789398	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1234	Malcolm and Rachel Hill		789409	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1235	Mr and Mrs W. J John		789410	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1237	Mr and Mrs D.T.R and E.J Evans		789417	Object	H1/2 Standard Letter Version 7	H1/2 Leiros Park Extension
Dep1240	Mr and Mrs P and M Hampton		789496	Object	No detailed comments received.	H1/2 Leiros Park Extension
Dep1358	Mr Richard Davies		785950	Object	The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.	H1/3 Groves Road, Cimla (Phase 2)

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep1318	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	<p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p>	H1/4 Ocean View, Jersey Marine

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>	
Dep1360	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p>	H1/8 Crymlyn Grove, Skewen (Phase 2)

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep1319	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	<p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • Crymlyn Grove (Phase 2) / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose</p>	H1/8 Crymlyn Grove, Skewen (Phase 2)

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					<p>demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>	
Dep1362	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p>	H1/9 Crymlyn Grove, Skewen (Phase 3)

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					<p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep1320	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	<p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>	H1/9 Crymlyn Grove, Skewen (Phase 3)
Dep1364	Mr		785950	Object	The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical	H1/10 Wern

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	Richard Davies				<p>to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	Goch, Skewen
Dep1322	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	<p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of</p>	H1/10 Wern Goch, Skewen

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					<p>proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • Wern Goch / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>	
Dep24	Mr Adrian Bamford		779719	Object	<p>The local have stated repeatedly, and in this plan that they intend to maintain the 'Green wedge' that separates Tonna from Neath, yet they also set out plans to build on it. Quite how this miracle of civil engineering is to be executed is beyond me. The 'Green Wedge' that is referred to in the LDP is actually the old and new Llantwit cemeteries. Nowhere in the UK will you find a definition of 'green wedge' that includes a cemetery, and if the people driving the LDP believe that is does then it throws a serious question mark over their competence.</p>	H1/11 Neath Road / Fairyland Road, Tonna
Dep28	Jacqueline Orrells		780430	Object	<p>I am concerned that you plan to build 300 houses on the Green Wedge at the bottom of Tonna on Neath Road. The added traffic to this small village would be substantial. There is a very limited amount of green wedges and fields in Tonna and it is important that we retain these areas and not continue to build on every bit of green land we have.</p> <p>Please note my objection to the 300 houses at Tonna Village.</p>	H1/11 Neath Road / Fairyland Road, Tonna
Dep202	Mr Stephen Hall		350649	Object	<p>Para 2.2.2. OB10 talks about achieving sustainable accessibility, with OB22 referring to the requirement to reduce the impact of traffic growth and congestion and promote the efficient and effective use of the transport network. I live in Tonna, where there are three ways into the village - via the steep, narrow and twisty B4434 road from Resolven past Tonna Hospital; the B4434 from Neath to Tonna via Llantwit which is constrained by the steep narrow hill past Llantwit cemetery, and the connecting road between the B4434 and A465 which crosses the River Neath at Aberdulais. Since moving to Tonna in 2001 I have seen a steady increase in on-</p>	H1/11 Neath Road / Fairyland Road, Tonna

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>road parking along the B4434 through the village, to the point where at choke-points such as the section near Tonna Post Office, the section near the Royal Oak Pub, and along Llantwit road there are real problems with adequate space to pass by parked vehicles, especially if an HGV or bus is coming the other way. On-pavement parking is now the norm along Llantwit road in order to allow passage for buses travelling between Neath and Tonna. Waits are required to allow cars to pass along the bottleneck sections of the B4434 as there is only sufficient space for vehicles travelling in one direction (though this could be alleviated if there were double-yellow lines through Tonna on one side of the road).</p> <p>Building an additional 300 houses on green wedge land between Tonna and Neath will generate a minimum of 300 extra cars passing through the village, 600 if there are two cars per household, plus several years worth of construction traffic. These cars and commercial vehicles will all be trying to pass along the B4434, Llantwit Road, and Gnoll Park Road. Unless the roads are widened (impossible at the cemetery choke point), additional parking restrictions put in place, or a new direct access road built to Fairyland Road passing south of the cemetery (which would require loss of some of the space at the Gnoll golf course), the additional traffic flow, particularly at commuting and school-run times, will increase traffic growth and congestion, and not promote the efficient and effective use of the transport network.</p>	
Dep490	Mrs M. Walker		333484	Object	Green Wedge - The green wedge should remain a green field wedge and should not be changed and destroyed for the sake of development. Tonna would lose its independence if it does. Sewerage - This is already inadequate. Llantwit Road- As far as pedestrians are concerned this is an accident waiting to happen. Buses and lorries constantly mount pavements to pass each other.	H1/11 Neath Road / Fairyland Road, Tonna
Dep284	Mr and Mrs J & A Smith		346585	Object	<p>Our reasons for protesting against building 300 houses (site reference H1/11) between Llantwit and Tonna Village are many.</p> <p>Firstly the loss of green belt is irreversible, as once built upon, this beautiful landscape is gone for ever and Tonna will lose its identity and community spirit. No way will people ever accept that the two cemeteries, as stated by Neath Port Talbot Planning Department, can be called a green wedge compared with the field between Llantwit and Tonna as this bit of green left is what gives Tonna its identity.</p> <p>If permission is granted to allow the proposed 300 houses to be built on this land, this will mean at least another 600 cars using the road either through Tonna or Llantwit. It has already been pointed out to the Council what the traffic conditions are like either way and if the Highway Authorities are the people who assessed the capacity of cars using these roads, someone somewhere, must have an ulterior motive for saying the problem can be sorted. We travel these roads many times every week and we have yet to see the roads clear enough to enjoy the journey into Neath or Tonna. On one day last week we were following a lorry going through Llantwit and every few yards there was a hold up with cars having to mount the pavement to allow the lorry through, then when we got to the slight incline leading up to the YMCA a bus came along from Neath and this caused real congestion until the bus was able to mount the pavement.</p> <p>We already have a traffic problem as the size of the village is not equipped to deal with this proposed development so to add another 600 odd more cars and you have havoc. It does not matter what plans the highway department come up with these roads can never be made wider as there are houses on both sides of most of the roads.</p> <p>How many times has our governments and Councils looked back and realised they have made errors? The long term picture socially and environmentally should be closely examined.</p> <p>Our understanding is that the site at Llandarcy was passed to build a village with all the amenities but now there are fewer houses to be built than first planned and passed so why not transfer this project to the Llandarcy one where the plans have been drawn up previously so that facilities can be put to accommodate all new houses in one project instead of cutting up our precious village of Tonna. We look forward to hearing from you.</p>	H1/11 Neath Road / Fairyland Road, Tonna
Dep518	Mrs Lesley Collier		785973	Object	<p>The reasons for protesting against building 300 house (H1/11) between Tonna and Llantwit are as following:</p> <ul style="list-style-type: none"> The loss of a green belt is irreversible , there is no going back once built upon. 	H1/11 Neath Road / Fairyland Road,

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<ul style="list-style-type: none"> The identity of Tonna as a village will be lost, it will just become part of the Town of Neath. The basis for the decision is unsound: inadequate traffic census (initially carried out on a Sunday morning- so not a representation of the current traffic flow). The cemeteries are counted as green areas / green wedge , completely bizarre in its decision. Traffic access to the proposed site and the flow of traffic through Neath , Llantwit and through the village of Tonna will be completely intolerable and will make travelling on foot , bicycle or by public transport all unsafe. Building 300 houses will add an additional 600 cars , the current road infrastructure is inadequate and unsafe , there are no other routes possible due to the cemeteries. 	Tonna
Dep583	Mr & Mrs Paul and Joanne Davies		786585	Object	<p>I am writing this letter in objection to the planning of H1/11 and the 300 or so houses that will be constructed. My reason for this is stated below.</p> <p>Firstly as a local Tonna boy who has lived in the village for 55 years and raised my family here. Have the Council contacted the local school and spoken to the headmaster Mr Lloyd Jones? The amount of children that are educated there at one time? While my two children were being taught, they were sat in the same classroom split in two, and the difference in age was 20 months. I confronted the headmaster at the time, Mr Evans, and he told me there were so many attending the school they had no alternative but to put far too many in numbers together, simply because of overcrowding. Now with another 300 houses, and many more families coming to Tonna, how is the school going to cope?</p> <p>The traffic has got to be another concern. I walk with my wife every day to Neath and witness the complications which the volume of traffic comes through Llantwit. All the residents who live on one side have to put their cars half on the road and half on the pavement, there is no clearance for prams or other types of transport that needs to go on the pavement. I once parked in Swansea with one of my tyres on my car on the pavement and was warned by the Police that I was illegally parked and, if caught again, would face a fine for illegal parking!! Everyone in Llantwit does it every day, so there must be one rule for some and another for others? Surely anyone with a bit of common sense can realise if you stood in Llantwit for a while how many problems arise during the day with the traffic! You can just about get cars through side by side, anything any bigger just creates havoc!! Ask the bus drivers with First Cymru.</p> <p>Lastly how can a green belt area, which I presumed would be fields, be associated with a cemetery?</p> <p>My wife and I think the ideology for another 300 or so houses in the village is ludicrous and totally disagree with the proposed plans.</p>	H1/11 Neath Road / Fairyland Road, Tonna
Dep906	Miss Bethan Jenkins AM		473974	Object	<p>I attended a packed public meeting at Tonna Primary Community School where many of the below points were raised with me as an AM.</p> <p>You state in the plan that a transport assessment has shown that there is "sufficient capacity to cope with demand," yet the LDP also recognises problems in relation to parking issues by Tonna Post Office and traffic difficulties on Llantwit Rd. You say those issues would need to be addressed for plans to go ahead as a result. What have you done to seek to address these current problems? What assessments have you made to date, or what additional studies have you carried out? What do the developers say? It is hard to understand how the transport assessment can come out favourable when there are currently many unknowns at the present time.</p> <p>It is clear that the drainage system as it stands could not cope with any new housing, and that a new hydraulic modelling system would need to be carried out. The LDP says the developer would need to implement a scheme to satisfy Welsh Water. At what point will the developer assess the needs of the area in relation to drainage? Will the hydraulic modelling scheme and its findings be shared with the community at large? How will Welsh Water assess its effectiveness?</p> <p>The detailed site assessment notes that there is contamination on part of the site- the historical records show the presence of a coal pit, cemeteries and a garage. Has a desk study or a ground investigation been conducted as yet to determine the risks? If so can these details be shared publicly before any decision is made? If not when will it happen?</p>	H1/11 Neath Road / Fairyland Road, Tonna

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>The site is susceptible to surface water flooding, and the LDP states that a new drainage system would have to be designed. When will plans for this be drawn up can we see it?</p> <p>The detail in the LDP states that access to GP services would be an issue due to current capacity problems within Neath town centre practises. You state that "contributions on new infrastructure would be required as part of the development." What does this mean exactly? Would the developer be expected to fund or locate a new centre? Why was this area chosen for housing development when this issue seems to be a worrying one in terms of lack of access to health care?</p> <p>Due to the fact that this area has under 20% of the population who speak Welsh, the language impact study that has been carried out only relates to area developments in the Swansea Valley. That means that the language report has no impact or strength in relation to this individual development. This, despite the fact that the LDP recognises there is not sufficient Welsh language education provision for people should 300 houses be erected. We know that the LDP states that there would need to be a re-designation of a current English medium school. It is important for residents to understand what is happening in relation to the council's 21st century schools initiatives before this plan goes ahead. What is happening with regards to developing Welsh education? Will the new school be adapted in time for pupils from this area to attend? What about the need for more Catholic secondary education? It seems difficult to understand how a housing development can go ahead prior to these matters being resolved. Also, a newly revised TAN20 was announced by the Minister, Carl Sargeant AM last week in the Assembly. Can the Council please let us know how this LDP will be adapted to take in to account these new guidelines? We do not want to face the situation which North Walian Councils sadly face, for example, where they have already adopted their LDP and will therefore not be taking the new TAN20 in to account for at least 4 years.</p> <p>I acknowledge the fact that a sustainability appraisal has been carried out, but people remain concerned about the "urban sprawl" - i.e. that Tonna, if this development goes ahead, will no longer be distinguished as a separate village, and will become another part of Neath centre. The LDP says that the "character of the site will change but careful attention to design will ensure it does not result in urban sprawl." Can you clarify how you came to this conclusion given that this development will go on a green wedge site?</p> <p>The LDP seems to suggest that there are adequate public transport facilities, yet anyone in this area will be very aware of the significant lack of evening bus services, and the decision by the council to cut Sunday and bank holiday services (though a paltry service has just started again by Select on a Sunday) What assessments have taken place to take this issue in to regard, especially in relation to those who will need to work evening and unsociable Sunday shifts?</p> <p>The 2011 census confirms my view that the 2008 population projections were significantly inflated. Do you not agree that NPT Council should go back to the drawing board, considering that this LDP is based on figures that are completely out of line with the facts? Of course the population projections are made by the Welsh Government and Plaid Cymru will be pushing for a change in policy in this very issue in the upcoming planning Bill.</p> <p>Residents are concerned that Llantwit Cemetery is extensively built out and enclosed by a large dominating wall and does not constitute green open space, particularly at street level, and therefore does not act as a green wedge to stop coalescence of settlements.</p>	
Dep856	Mr Philip Rowlands		786637	Object	<p>I have just tried to complete this form online before the deadline of 24.00 hrs tonight, but I am being advised that "Page not found". Please advise me why this is the case as it seems to have prevented my wife and myself registering our objection which are:</p> <ol style="list-style-type: none"> 1. The inevitable unmanageable traffic congestion in Tonna and Llantwit, which would inevitably lead to increased pollution and risk of accidents. 2. The councils extreme U turns which have enabled their previously designated "green belt land" to become available for development, and the ridiculous decision to call a cemetery "green belt". Will the next step be to build on the cemetery in the future? 	H1/11 Neath Road / Fairyland Road, Tonna
Dep888	Rt Hon		786642	Object	I am deeply concerned by the proposals included in the Local Development Plan for Tonna and the issues that have been highlighted	H1/11 Neath

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Peter Hain MP				<p>to me by residents both inside the village and outside the village regarding this proposal.</p> <p>The proposal to allocate the 300 residential units on the land that has traditionally separated the village from Neath contradicts a number of Neath Port Talbot County Borough Council's own policies including policy on green wedges and its own description of Tonna as a small local centre providing limited development opportunities.</p> <p>The proposed allocation would also have a serious impact on local infrastructure including the already badly overstretched road structure, drains and the capacity for local facilities like schools to withstand the added pressures.</p> <p><u>Neath / Tonna / Cimla / Efail Fach Green Wedge</u></p> <p>The Unitary Development Plan previously acknowledged the importance of this land in clearly representing a defined end point to the town of Neath and a subsequent start of the village of Tonna. Subsequent independent reviews have also recognised the importance this land provides as a green wedge in preventing the coalescence of the two settlements.</p> <p>To proceed with the allocation of 300 residential units would remove completely the green open space leaving an enclosed cemetery, which does not constitute green open space, as the boundary between the two settlements and adversely affecting the integrity of the green wedge. I am perplexed why, as recently as 2011, the importance of the green wedge was highlighted only for two years later a proposal to be brought forward that would see houses built on it and the open space lost.</p> <p><u>Settlement Hierarchy</u></p> <p>The Local Development Plan describes Tonna as a 'small local centre' and as such should provide limited development opportunities. However by including 300 residential units in the plan it would see the local community increase by nearly a third.</p> <p>Furthermore the allocation of 300 units is the largest amount allocated to an existing settlement. The only bigger allocations are Coed D'Arcy and Harbourside which are entirely new builds in brownfield sites. If Tonna is considered a 'small local centre' by the planners then why is such a large allocation being considered? Such a massive population increase would fundamentally change the characteristics of the village and it would no longer be a 'small local centre'.</p> <p><u>Highways</u></p> <p>Access to and from Tonna is extremely difficult with a narrow and windy road through Llantwit, which is a main route into Neath not just from Tonna but also from Clyne.</p> <p>Quite often traffic comes to a standstill because of the levels of traffic and the narrow nature of the road, especially when a bus or a lorry is travelling. On numerous occasions vehicles are forced into mounting the pavement to avoid a collision with oncoming traffic. The situation has become so bad that the Council has installed bollards to prevent people from doing this. Through Llantwit it is hardly ever possible for both lanes of traffic to traverse at the same time.</p> <p>Equally, access is problematic at the far end of the village along Park Street where cars are double parked and traffic is reduced to single file. Further along the route along Dulais Fach Road this is exceptionally narrow.</p> <p>The only access to the A465 and hence the M4 and the Heads of the Valley roads will be through Llantwit and Neath town and through Tonna village all of which are highly congested now.</p> <p>For the traffic assessment to suggest that there is sufficient capacity to accommodate the anticipated level of demand generated by 300 dwellings provided infrastructure improvement are made does not adequately address the problems but simply defers them until a later time when the problems will have increased. I have grave reservations, in particular as there are no details of what is required,</p>	Road / Fairyland Road, Tonna

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					<p>that these improvements will not sufficiently improve the infrastructure to withstand the big increase in traffic movement.</p> <p><u>Infrastructure</u></p> <p>A number of issues have been raised by residents previously about the capacity for the infrastructure to handle the increased demand which will be brought about by the increase in residential properties. These include facilities like land drainage and sewage.</p> <p>The local sewage network currently has problems handling the current capacity with residents experiencing backlogs that spill onto the surface. Whilst the Local Development Plan acknowledges this and the need for a hydraulic modelling assessment and improvement work, I have serious reservations about the impact the increase on demand will have on existing dwellings where the pressure points will be felt.</p> <p>There are also issues with surface drainage which is particularly bad in the winter with flood water draining off the land and down Llantwit Road which has its own flooding problems.</p> <p>Again I am perturbed that the site is still included despite the LDP acknowledging these major infrastructure problems and without any details of how you expect them to be overcome.</p> <p>I fully support the residents in their objections and ask that you include this letter as a strong objection to the proposal.</p>	
Dep881	Mrs Alison Bowen	Tonna Residents Action Group	786665	Object	<p><u>Covering Letter</u></p> <p>Representations to NPTCBC in respect of Deposit Local Development Plan draft Policy H1/11 - Allocation of land for residential development at Neath Road / Fairyland Road, Tonna to accommodate 300 dwelling units.</p> <p>Following a public meeting of representatives of all of the streets in Tonna, the above group was formulated in order to make a joint representation to Neath Port Talbot County Borough Council voicing the concerns of the residents of Tonna.</p> <p>Please find enclosed our Deposit LDP Representation Form, our group representation letter and some lists of objecting residents in accordance with Guidance Note 6 in the Deposit LDP Representation Form and your own declared preference for a single letter plus a list of names.</p> <p>Total Number of Signatures: 1,055.</p> <p><u>Group Representation Letter</u></p> <p>Representations to NPTCBC in respect of Deposit Local Development Plan draft Policy H1/11 - Allocation of land for residential development at Neath Road / Fairyland Road, Tonna to accommodate 300 dwelling units .</p> <p>The Tonna Residents Action Group was formed following a Public Meeting held at Tonna Primary Community School, School Road, Tonna in order to object to the above draft policy H1/11 .</p> <p>We think the LDP is unsound and should be changed and the allocation of land for housing at Neath Road / Fairyland Road, Tonna (Policy H1/11) should be removed due to the following:</p> <p>P2 The plan and its policies have been subjected to Sustainability Appraisals including Strategic Environmental Assessment - The SEA undertaken for land at Neath Road / Fairyland Road is unsound for the reasons indicated below.</p> <p>C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas - The Council's own policies have been disregarded in respect to land at Neath Road / Fairyland Road.</p>	H1/11 Neath Road / Fairyland Road, Tonna

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>CE1 The plan sets out a coherent strategy from which its policies and strategies logically flow and/or, where cross-boundary issues are relevant, it is compatible with development plans prepared by neighbouring authorities - The allocation of land at Neath Road / Fairyland Road totally disregards the Plans Strategic Policies in terms of green wedges, coalescence, development in the countryside and settlement hierarchy.</p> <p>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base - There is no credible evidence base for the allocation of land at Neath Road / Fairyland Road other than a need to identify a large housing site.</p> <p>CE3 There are clear mechanisms for implementing and monitoring - The implementation of land at Neath Road / Fairyland Road has not been considered and the numerous constraints to developments addressed by s106 agreement.</p> <p>Further to the above:</p> <ul style="list-style-type: none"> • The loss of a long established green wedge which will lead to the coalescence of the discrete communities of Tonna and Neath. This clearly contradicts the strategic policies in the deposit LDP and contradicts the accepted advice of the Council's consultants, TACP who reviewed existing green wedges to inform the LDP process in 2011. • Llantwit Cemetery is extensively built out and enclosed by a large dominating wall and does not constitute green open space particularly at street level and therefore does not act as a green wedge to stop the coalescence of settlements. • The expansion of the community of Tonna by up to 30% despite the clear guidance in the deposit LDP that Tonna is a small local centre and as such should provide limited development opportunities. • That this is clearly development in the open countryside and contravenes all rational planning policy both local and national. • The infrastructure requirements to support the development of the site are extensive with no real detail of the implications and are uncoded, particularly off site highway works given existing issues, site sewerage and affordable housing. • A limited environmental impact assessment of the site has been undertaken with no clear report on the full impact of development on biodiversity. The rural character of Fairyland Road will be changed and established trees and hedgerows lost to accommodate road improvements and will seriously affect the setting of the Gnoll historic gardens and Ivy Tower. • This decision is ill considered and breaches a number of the Council's own policies and is a knee jerk response to Welsh Government's requirement to find additional housing sites in the Neath area. <p>In accordance with Guidance Note 6 in the Deposit LDP Representation Form the attached list of residents would be grateful if the above concerns could be brought before the attention of the Planning Inspector.</p>	
Dep962	Mr Brendan Barker		786774	Object	<p>Standard Tonna (H1/11) letter</p> <p>Representations to NPTCBC in respect of Deposit Local Development Plan draft Policy H1/11 - Allocation of land for residential development at Neath Road / Fairyland Road, Tonna to accommodate 300 dwelling units.</p> <p>I think the LDP is unsound and should be changed and the allocation of land for housing at Neath Road / Fairyland Road, Tonna (Policy H1/11) should be removed due to the following:</p> <p>P2 The plan and its policies have been subjected to Sustainability Appraisals including Strategic Environmental Assessment - The SEA undertaken for land at Neath Road / Fairyland Road is unsound for the reasons indicated.</p> <p>C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas - The Council's own policies have been disregarded in respect to land at Neath Road / Fairyland Road.</p> <p>CE1 The plan sets out a coherent strategy from which its policies and strategies logically flow and/or, where cross-boundary issues are relevant, it is compatible with development plans prepared by neighbouring authorities - The allocation of land at</p>	H1/11 Neath Road / Fairyland Road, Tonna

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					<p>Neath Road / Fairyland Road totally disregards the Plans Strategic Policies in terms of green wedges, coalescence, development in the countryside and settlement hierarchy.</p> <p>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base - There is no credible evidence base for the allocation of land at Neath Road / Fairyland Road other than a need to identify a large housing site.</p> <p>CE3 There are clear mechanisms for implementing and monitoring - The implementation of land at Neath Road / Fairyland Road has not been considered and the numerous constraints to developments addressed by s106 agreement.</p> <p>Further to the above:</p> <ul style="list-style-type: none"> • The loss of a long established green wedge which will lead to the coalescence of the discrete communities of Tonna and Neath. This clearly contradicts the strategic policies in the deposit LDP and contradicts the accepted advice of the Council's consultants, TACP who reviewed existing green wedges to inform the LDP process in 2011. • Llantwit Cemetery is extensively built out and enclosed by a large dominating wall and does not constitute green open space particularly at street level and therefore does not act as a green wedge to stop the coalescence of settlements. • The expansion of the community of Tonna by up to 30% despite the clear guidance in the deposit LDP that Tonna is a small local centre and as such should provide limited development opportunities. • That this is clearly development in the open countryside and contravenes all rational planning policy both local and national. • The infrastructure requirements to support the development of the site are extensive with no real detail of the implications and are uncoded, particularly off site highway works given existing issues, site sewerage and affordable housing. • A limited environmental impact assessment of the site has been undertaken with no clear report on the full impact of development on biodiversity. The rural character of Fairyland Road will be changed and established trees and hedgerows lost to accommodate road improvements and will seriously affect the setting of the Gnoll historic gardens and the Ivy Tower. • This decision is ill considered and breaches a number of the Council's own policies and is a knee jerk response to Welsh Government's requirement to find additional housing sites in the Neath area. <p>I would be grateful if the above concerns could be brought before the attention of the Planning Inspector.</p>	
Dep960	Kym Hirons		786777	Object	Standard Tonna (H1/11) letter	H1/11 Neath Road / Fairyland Road, Tonna
Dep957	Mr E C Jones		786780	Object	Standard Tonna (H1/11) letter	H1/11 Neath Road / Fairyland Road, Tonna
Dep955	Mrs P J Jones		786783	Object	Standard Tonna (H1/11) letter	H1/11 Neath Road / Fairyland Road, Tonna
Dep953	Mr Brian Thisby		786786	Object	Standard Tonna (H1/11) letter	H1/11 Neath Road / Fairyland Road, Tonna

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep927	Mr P L White	Tonna Community Council	196359	Object	<p>We think the LDP is unsound and should be changed and the allocation of land for housing at Neath Rd/Fairyland Road (Policy H1/11) should be removed.</p> <p>P2 The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment. -The SEA undertaken for land at Neath Rd/Fairyland Road is unsound for the reasons indicated</p> <p>C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas. - The Council's own policies have been disregarded in respect of land at Neath Rd/Fairyland Road</p> <p>CE1 The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross-boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities - the allocation of land at Neath Rd/Fairyland Road totally disregards the Plans Strategic Policies in terms of green wedges, coalescence, development in the countryside ad settlement hierarchy</p> <p>CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base - there is no credible evidence base for the allocation of land at Neath Rd/Fairyland Road other than a need to identify a large housing site</p> <p>CE3 There are clear mechanisms for implementation and monitoring - the implementation of land at Neath Rd/Fairyland Road has not been considered and the numerous constraints to development to be address by s106 agreement</p> <p>Summary of Representations</p> <p>This site has been the subject of green wedge protection for a long period to reflect its importance in creating a green buffer between the settlements of Tonna and Neath to avoid coalescence.</p> <p>The conclusions of an independent review of the Borough's green wedges in 2011 identified this site as an important green lung of open space and recommended no change to the green wedge designation in the area an suggested its extension. At that time this advice was accepted by NTPCBC and the site remained protected.</p> <p>Subsequently NPTCBC were instructed by WG to increase their housing land supply and a review of potential candidate sites was undertaken. The latest Joint Housing Land Availability Study (2012) identified Coed Darcy as providing 4,000 units which meets the need for housing land in the Neath area. Therefore this site should not be required in any event.</p> <p>Despite an overwhelming departure from its own policies, a total disregard for its own assessment criteria, settlement boundaries and settlement hierarchy criteria, following a cursory site assessment which raised issues with biodiversity, site drainage, transportation, foul sewerage, utility provision, and need for community facilities amongst others this site has now been allocated to accommodate 300 houses. There is a massive objection to this within the community of Tonna. The need to identify additional housing land at all costs has outweighed rational planning assessment.</p> <p>The Council justify this massive change in position as a minor boundary change with little impact on the green wedge and will not lead to coalescence because of Llantwit Cemetery. Be under no illusion if this goes ahead the substantive green wedge that separates Tonna from Neath will be totally lost and the settlements will merge. Citing Llantwit Cemetery as providing open space is completely wrong as it forms part of the fabric of the urban area and in visual terms forms part of the built environment.</p> <p>Development along Fairyland Road and the creation of a site access and road widening will lead to the loss of hedgerows and trees with a significant impact on biodiversity and a complete change in character from a leafy land to a suburban housing street. This will be detrimental to the setting of Gnoll Historic Gardens and Ivy Tower.</p> <p>Spurious benefits for the community of Tonna have been quoted as arising from the development but in reality development on such a large scale will add to the misery of residents who already suffer from substandard access and egress from the village with no</p>	H1/11 Neath Road / Fairyland Road, Tonna

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					<p>proposals to address this in the Plan. Importantly the site assessment indicates that development cannot proceed until traffic problems at Llantwit Road and Park Street are addressed.</p> <ul style="list-style-type: none"> • This is a major departure from policy both existing and emerging and is fundamentally bad planning. The case is not made for its allocation and the site should be withdrawn. • The loss of a long established green wedge which will lead to the coalescence of the discrete communities of Tonna & Neath. This clearly contradicts the strategic policies in the deposit LDP and contradicts the accepted advice of the Council's consultants, TCPA who reviewed existing green wedges to inform the LDP process in 2011 • Llantwit Cemetery is extensively built out and enclosed by a large dominating wall and forms part of the urban form and does not provide green open space particularly at street level and therefore does not act as a green wedge to stop the coalescence of settlements. • The expansion of the community of Tonna by up to 30% despite the clear guidance in the deposit LDP that Tonna is a small local centre and as such should provide limited development opportunities. • That this is clearly development in the open countryside and contravenes all rational planning policy both local and national • The infrastructure requirements to support the development of the site are extensive with no real detail of the implications and the ability of a developer to deliver. Highway issues at Llantwit Road and Park Street which are extremely problematic currently appear insurmountable to overcome. • A limited sustainability assessment of the site has been undertaken with no clear report on the full impact of development on biodiversity. The rural character of Fairyland Road will be changed and established trees and hedgerows lost to accommodate road improvements and will seriously affect the setting of the Gnoll historic gardens and Ivy Tower. • This decision is ill considered and breaches a number of the Council's own policies and is a knee jerk response to Welsh Government's requirement to find additional housing sites in the Neath area. <p>1. Introduction</p> <p>1.1 Draft LDP Deposit Plan Policy H1/11 allocates 11.6ha of land with the capacity to accommodate 300 dwelling units at Neath Road/Fairyland Road Tonna. This land provides a clear and undeveloped break between Tonna and the edge of the built up area of Neath defined by Llantwit Cemetery and is currently protected in the adopted Unitary Development Plan by Policy ENV2 which specifically seeks to avoid the coalescence of settlements. Llantwit Cemetery falls within the boundary of ENV2 but in its own right does not provide open space particularly at street level where the large wall surrounding the cemetery dominates the street scene and provides a continuation of the urban form</p> <p>1.2 The settlement of Tonna comprises just over a 1000 residential dwellings with a resident population of just under 2,500. This proposal represents a 30% expansion of the settlement.</p> <p>1.3 The decision by NPTCBC to include this site within the deposit plan is incredible and completely contradicts: its existing planning status in the UDP; the level of development expected for a defined Small Local Centre as identified in the LDP; the key strategic objectives of the LDP to mitigate against the coalescence of settlements via the designation of green wedges and is clearly development in the countryside</p> <p>2. Unitary Development Plan</p> <p>2.1 UDP POLICY ENV2 - GREEN WEDGES</p> <p>Green wedges are identified to protect the setting of built-up areas and prevent urban coalescence between settlements. Within these areas inappropriate development will not be permitted except in very exceptional circumstances. Apart from those forms of development which are specifically defined as appropriate, any other development which would prejudice the openness of the Green Wedge will be considered as inappropriate development and will not be permitted. The following Green Wedges are identified on the Proposals Map:</p> <p>(iii) Neath/Tonna/Cimla/Efail Fach</p>	

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					<p>2.2 The UDP indicates that Green wedges are used to define areas of countryside that may not be of particular scenic value but are particularly important in terms of protecting the form and setting of an urban area, or preventing the coalescence of settlements.</p> <p>2.3 Commentary The importance of this green wedge status is emphasised in the adopted UDP and reflects a long standing policy to avoid the coalescence of Tonna with Neath. The site is probably the most important part of the Borough's green wedge network.</p> <p>3. LDP - Settlement topic paper August 13</p> <p>3.1 Within the Topic Paper, Tonna is described as lying on the edge of the Neath built up area and is largely surrounded by open countryside.</p> <p>3.2 Review of Candidate Sites. The Topic Paper describes in detail the definition of settlement limits, how they are arrived at and the allocation of new development sites.</p> <p>3.3 Defining Settlement Limits - Settlement limits help to steer development towards the most appropriate and sustainable locations and at the same time reconcile development with the need to protect the countryside. More specifically, settlement limits perform the following important functions: <ul style="list-style-type: none"> • They define the area within which development would normally be allowed, taking into account all other material considerations; • They promote the full and effective use of urban land, thus concentrating development within settlements by preventing coalescence, ribbon development and fragmented development. </p> <p>3.4 Policy SC1: Settlement Limits Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle.</p> <p>3.5 A three stage process is applied in determining the allocation of new sites</p> <p>3.6 Stage 1 - Classification of Settlements</p> <p>The Topic Paper describes the hierarchy of settlements and Tonna is categorised as Tier 4: Small Local Centre. Small local centres have: <ul style="list-style-type: none"> • At least one shop or several shops which are dispersed through the settlement; and/or • Several community facilities such as a community hall, park / public open space, school. • Adequate public transport links to the nearest large local centre. </p> <p>Such locations provide more limited potential to accommodate new development</p> <p>3.7 Commentary</p> <p>As a small local centre only limited new development should be expected and should certainly not grow the settlement by 30% and lead to a coalescence of the settlement with Neath by a massive expansion into the open countryside</p> <p>3.8 Stage 2: Assessing the Capacity of Land within Existing Settlements The second stage in the review involved assessing the capacity within the existing settlement pattern to accommodate new development.</p> <p>3.9 Commentary</p> <p>This allocation has been achieved by ignoring an existing Green Wedge designation, extending the settlement boundary on a large</p>	

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					<p>scale into the open Countryside both of which are in contradiction to UDP and emerging LDP Strategic Policy</p> <p>3.10 Stage 3: Assessing the Potential for Settlement Expansion Being guided by the classification of settlements from Stage 1, the assessment of the capacity of land within existing settlements to accommodate development from Stage 2 and the overall level of housing provision needed over the Plan period, the third stage of the review was to carry out an assessment of the opportunities to expand settlement limits. At this stage the following was considered:</p> <ul style="list-style-type: none"> • Sites that would not result in the coalescence of settlements; and • Sites that would not result in an unacceptable intrusion into the countryside. <p>3.11 Commentary</p> <p>Clearly by NPTCBC's actions they have ignored their own criteria and blatantly allocated this site against current Policy and the strategic policy of the emerging Plan. This site should never have progressed through this assessment process.</p> <p>4 TACP - Consultancy Services For The Provision of Landscape Advice Final Report - June 2011</p> <p>4.1 TACP Environmental Consultants were commissioned by NPTCBC to provide landscape advice to assist with the preparation of the Local Development Plan (LDP).</p> <p>4.2 The final recommendations are as follows:</p> <p>4.3 Neath/Tonna/Cimla/Efail Fach Green Wedge covers an area of approximately 482ha to prevent coalescence between Neath and Tonna to the south of the A465 and prevent expansion of Neath towards Efail Fach. Given its location in relation to the built up areas of Neath and Tonna and its proximity of the Neath Valley this area is potentially important in terms of urban open space strategies and the potential for enhancing green and blue corridors along the Neath valley, especially as the Neath-Cynon has been identified as a primary corridor within the Valleys Regional Park.</p> <p>4.4 Candidate Sites: There are no Key Sites identified within this Green Wedge.</p> <p>4.5 Initial Recommendations: If the SLA designations are taken forward it is recommended that the boundaries for both the Green Wedge and the relevant SLAs are considered carefully. However, as the Green Wedges are small discrete areas with a clear planning function it would seem appropriate for them to remain as Green Wedges. There are three areas of potential extension to the Green Wedge that could be beneficial to preventing coalescence and protecting the urban setting. The first is located to the north west of the current green wedge, either side of the A465 dual carriageway between Cadoxton-Juxta-Neath and Llantwit and Cefn-y-don. This is a high quality landscape and would protect an open aspect from the A465 road corridor. It could provide blue and green infrastructure facilities in accordance with the Valleys Regional Park concept. It would also link into the proposed extension to the Crymlyn Bog/Crymlyn Burrows/Llandarcy Green Wedge discussed above thus further reinforcing and protecting an important lung of urban open space. The second area is located to the north of the existing boundary between Cefn-y-don and Mosshouse Wood. Again this would prevent development to the south of Tonna and would link into the lung of urban open space. The third area is located to the south west of the existing boundary, along the southern limit of Mount Pleasant. This would reduce expansion of Mount Pleasant and Pencaerau and protect its rural backdrop.</p> <p>4.6 Results following ground truthing - The proposed additional area to north of Cemetery which includes A4230 and River Neath was considered but has not been taken forward. This is low lying flood plain land and is unlikely to have development pressure. It would however form a valuable component of an open space strategy and would be ideal for green and blue infrastructure proposals. It was agreed that there was benefit in including the proposed additional area to south of Cefn-y-don in the Green Wedge. The additional areas to north of cemetery and south of Mount Pleasant have not been taken forward as it was not considered essential to the purpose of the Green Wedge</p>	

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>4.7 Proposed Changes to Boundaries - If NPTCBC accept the inclusion of the proposed Cefn-y-don extension the boundary should be revised to follow the settlement edge and if the change to the eastern boundary is accepted this should be revised accordingly.</p> <p>4.8 Commentary</p> <p>An independent assessment of the existing green wedges was undertaken and their conclusions were that the Neath Rd/Fairyland area should be retained as Green Wedge to reflect its importance as a lung of open space and its extension should be considered. This seems to be accepted by NPTCBC in June 2011 but subsequently this advice was completely disregarded in the pursuit of the allocation of additional housing land. No qualitative assessment subsequently has been undertaken which can justify this decision</p> <p>5. Local Development Plan Deposit draft</p> <p>Spatial Strategy</p> <p>5.1 Conserving our Environment - restricting development within the open countryside. The strategy recognises the need to consider the environmental impacts of proposed development and will balance growth with environmental considerations. The designation of Special Landscape Areas conserves the highest value landscapes and the identification of Green Wedges prevents urban coalescence and protects the setting of the urban area</p> <p>5.2 Strategic Policy SP3 Sustainable Communities The delivery of sustainable, healthy and cohesive communities and the conservation of the countryside will be promoted by:</p> <ol style="list-style-type: none"> 1. Defining sustainable communities and locations for development by the identification of a settlement hierarchy that reflects the role and function of settlements; 2. Defining settlement limits within which development which accords with the settlement hierarchy will be permitted in principle; 3. Resisting inappropriate development outside settlement limits. <p>5.3 Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>5.4 Strategic Policy SP14: The Countryside and the Undeveloped Coast The countryside and undeveloped coast, including landscapes, seascapes and agricultural land, will be protected and where feasible enhanced through the following measures:</p> <ol style="list-style-type: none"> 1. The protection of the open countryside through the control of inappropriate development outside settlement limits; 4. The designation and protection of Green Wedges. <p>5.5 Commentary</p> <p>The spatial strategy of the UDP clearly support Green Wedge policies and protection of the open countryside from development to avoid coalescence of settlements and intrusion into open countryside</p> <p>LDP Policy</p> <p>5.6 Policy EN3 Green Wedges In order to prevent the coalescence of settlements and to protect the setting of urban areas, Green Wedges have been designated in the following locations: - Neath/Tonna/Cimla/Efail Fach Within these areas there is a presumption against inappropriate development.</p>	

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					<p>5.7 A review of the five existing Green Wedges be retained largely unchanged, with the exception of minor changes to boundaries to take account of proposed developments and allocations where appropriate.</p> <p>5.8 Commentary</p> <p>Para 5.7 above is a complete falsehood because far from a minor boundary change the substantive green wedge that separates Tonna from Neath will be totally lost and the settlements will merge. Citing Llantwit Cemetery as providing open space is completely wrong as it forms part of the fabric of the urban area. This is a major departure from policy both existing and emerging and is fundamentally bad planning. It cannot be justified on any logical assessment grounds including those applied by NPTCBC in considering candidate sites and can only be explained by the need to allocate housing sites within the Neath settlement area at any cost. Spurious benefits for the community of Tonna have been quoted as arising from the development but in reality development on such a large scale will add to the misery of residents who already suffer from traffic disruption along Llantwit Road, Neath Road and Park Street with no proposals to address this in the Plan</p> <p>Development along Fairyland Road and the creation of a site access and road widening will lead to the loss of hedgerows and trees with a significant impact on biodiversity and a complete change in character from a leafy land to a suburban housing street. This will be detrimental to the setting of Gnoll Historic Gardens and Ivy Tower.</p> <p>6. LDP Strategic Housing Site Assessment report - August 13</p> <table border="1" data-bbox="1110 919 2567 1858"> <thead> <tr> <th data-bbox="1110 968 1813 1010">NPTCBC Position</th> <th data-bbox="1813 968 2567 1010">Commentary</th> </tr> </thead> <tbody> <tr> <td data-bbox="1110 1010 1813 1121">A Greenfield site currently within the green wedge but constitutes only a small part of the overall green wedge allocation</td> <td data-bbox="1813 1010 2567 1121">Of massive significance and its loss will totally undermine green wedge policy locally and will lead to coalescence of the settlements of Neath and Tonna</td> </tr> <tr> <td data-bbox="1110 1121 1813 1199">Community facilities via s106</td> <td data-bbox="1813 1121 2567 1199">Very unlikely given extensive infrastructure requirements identified elsewhere</td> </tr> <tr> <td data-bbox="1110 1199 1813 1339">Site contains areas of archaeological importance and refers to limited impact on Gnoll Historic Park and Garden, Ivy Tower.</td> <td data-bbox="1813 1199 2567 1339">The impact on Gnoll and Ivy Tower is then contradicted - 'Careful design and layout would however be required in order to ensure there would be no impact on the views of the Gnoll and the Ivy Tower located above the site'</td> </tr> <tr> <td data-bbox="1110 1339 1813 1480">Is the site located within or adjacent to a European, National, Regional or Local Ecological Designation? 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The Council's Highway Department has subsequently examined the TA and is satisfied with the findings and conclusions.</td> <td data-bbox="1813 1591 2567 1858">'Notwithstanding the conclusions of the TA, a localised issue with regard to on-street car parking, particularly in the area outside Tonna Post Office and in the vicinity of the harsh bend in the main road at Llantwit, has been highlighted as an issue and this would need to be addressed in order for development to proceed.'</td> </tr> </tbody> </table>	NPTCBC Position	Commentary	A Greenfield site currently within the green wedge but constitutes only a small part of the overall green wedge allocation	Of massive significance and its loss will totally undermine green wedge policy locally and will lead to coalescence of the settlements of Neath and Tonna	Community facilities via s106	Very unlikely given extensive infrastructure requirements identified elsewhere	Site contains areas of archaeological importance and refers to limited impact on Gnoll Historic Park and Garden, Ivy Tower.	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Dep1365	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is</p>	H1/11 Neath Road / Fairyland Road, Tonna						

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					<p>1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep999	Mr Eli Davies		786743	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep998	Mr & Mrs M and R Burton		786744	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep997	WA & EE Price		786745	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep995	Alvine Harris		786746	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep993	Mr Lloyd John		786747	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep991	Mrs Deborah Reed		786748	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep990	Miss Amy John		786749	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep989	Mr Philip Reed		786751	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep987	Mr John Davies		786754	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep984	Mr Paul Stephens		786756	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep981	Mrs Christine Stephens		786757	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep979	Caroline Rosser		786758	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep976	R C Kirkhouse		786760	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep975	Mrs P Waby		786761	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep973	Mrs Ann Protheroe		786762	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep972	Mr & Mrs Alan & Sandra Lloyd		786763	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep969	RW & D McCleery		786767	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep967	S Phillips		786768	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1083	Annette Williams		786770	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep965	Mr David R Lewis		786772	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep964	Mr Jonathan Tucker		786773	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1323	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	<p>New Site Allocations</p> <p>The new allocations that are made by the plan underscore these risks. By accepting a very high growth rate, and by setting more reliable (but quite low) targets for its brownfield and regeneration projects, the Council allocates a lot of new greenfield sites of various sizes in multiple locations around the County Borough. Some of these are listed in Table 5.1 below - and a wider picture of proposed site allocations, including the existing landbank are illustrated on a plan which is attached at Appendix A .</p> <p>Table 5.1 - New Site Allocations in the DLDP</p> <p>Site Name / No. of Units / Site Reference</p> <ul style="list-style-type: none"> • <i>Leiros Park Extension*</i> / 200 / H1/2 • <i>Ocean View</i> / 81 / H1/4 • <i>Dwr Y Felin Lower School*</i> / 100 / H1/5 • <i>Neath Town Centre Redevelopment*</i> / 50 / H1/7 • <i>Crymlyn Grove (Phase 2)</i> / 75 / H1/8 • <i>Crymlyn Grove (Phase 3)*</i> / 150 / H1/9 • <i>Wern Goch</i> / 50 / H1/10 • <i>Neath Road / Fairyland Road*</i> / 300 / H1/11 <p>* Newly allocated sites in the DLDP <i>Italics indicates greenfield sites.</i></p> <p>The DLDP establishes no sequence and no order to the release of these sites which will be competing for limited but footloose demand. Experience suggests that sites will be cherry picked taking up market, environmental and infrastructure capacity, placing stress on existing communities and deflecting attention from genuine and strategic regeneration initiatives.</p> <p>If all of these sites are to survive (which they clearly should not) then at the very least the DLDP should include express provision for sequence and phasing - so that greenfield sites are controlled or held in reserve. The DLDP refers to the monitoring framework to monitor the delivery of new housing over time, and to the concept of using the AMR. However, given the presence of clear priorities in the LDP, it is inappropriate to rely on the AMR (which will not be able to 'de-allocate' land at a later date). It could, however, re-prioritise 'reserve' sites or those earmarked to come forward towards the end of the plan period.</p> <p>This approach is available and highly relevant. The number and size of new sites is significant and whilst some of these are existing allocations, they show a pattern of development that is at odds with the sequential approach that lies at the heart of the planning system. Managing the release of land is why we have green belts, and green wedges and to a lesser extent, settlement limits) and is a key responsibility of the LDP. Ensuring it does this in a way that meets other local and regional social and economic objectives and strategies - whether these are site or project specific or corridor or area based - is a second major priority.</p>	H1/11 Neath Road / Fairyland Road, Tonna
Dep1001	Ms Kathleen		788234	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road /

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Davies					Fairyland Road, Tonna
Dep1004	Mrs R. Jolly		788235	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1007	Ms Belinda Docherty		788236	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1008	Mr G. Jones		788238	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1010	Mr Peter Williams		788239	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1012	W. Meredith		788240	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1014	Mr & Mrs Mc Cleery		788242	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1016	Ms Lorraine Surringer		788251	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1018	Mark, Judith and Miryam Huntley		788252	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1020	Mr Glyndwr Rees		788253	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1022	Mr P. Clifford		788254	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1023	Mrs		788256	Object	Standard Tonna (H1/11) letter.	H1/11 Neath

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Marian Mc Phee					Road / Fairyland Road, Tonna
Dep1024	Ms Avril James		788257	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1026	Lynsey Preston		788258	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1028	Mrs D. Greenslade		788259	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1030	Ms Mair Payne		788261	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1032	Mr Gareth Jones		788262	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1036	Mrs Maureen Daniels		788263	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1039	The Occupier		788266	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1040	Mr & Mrs John S. Yates		788267	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1042	Mr S.P. Edwards		788268	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1044	Mrs D. John		788269	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna

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Dep1046	B.L & J. Reynolds		788270	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1047	Mrs Shirley Rees		788271	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1048	Mr & Mrs P & M Morris		788272	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1049	Mr A. Ruggiero		788274	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1050	Carl & Rowena John		788275	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1051	C & E Storey		788276	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1086	Ms Susan Jones		788277	Object	Standard Tonna (H1/11) letter plus the following additional wording: Llantwit Road cannot cope with the traffic already and any more will put people's lives in danger.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1052	Leonie Charles		788278	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1053	Ms Julie Clarke		788279	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1054	A.E. John		788334	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1055	Mr Arthur Donald Edwards		788335	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna

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Dep1056	Frances D. Tavender		788336	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1057	Mr D.B. Jones		788337	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1059	Daphne E. Griffiths		788338	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1060	Ms Linda Furlong		788340	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1063	Kevin, Susan, Lucy and Matthew Spear		788341	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1065	Anthony & Margaret Phillips		788342	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1066	Rebecca Parr & Craig Williams		788343	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1067	Mr & Mrs K (and Oliver) Jones		788344	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1068	Mr & Mrs Richard & Linda Summers		788345	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1069	Audrey Davies & Denzil Brokensha		788347	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1070	Karen, P. & J.M Kirkhouse		788348	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna

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Dep1072	Mr & Mrs K.M &P.J. Jenkins		788349	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1074	Ms Rhona Thomas		788350	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1075	Ms Glenys E. Evans		788351	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1077	J. Williams		788352	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1078	Lisa & Kevin Williams		788353	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep1082	Mrs J. Fennell		788354	Object	Standard Tonna (H1/11) letter.	H1/11 Neath Road / Fairyland Road, Tonna
Dep452	Mr Eric Lewis		324744	Object	<p>Housing Site H1/12 lies at an elevated position, being a Greenfield site, extending eastwards into open countryside beyond the built envelope of Baglan.</p> <p>The site consists of some 5.9 hectares of sloping grazing land, which if developed will have a significant, adverse effect upon the character and setting of the landscape overlooking Baglan. It will be seen as urban sprawl, unrelated to the general spatial pattern of housing with this part of the Port Talbot Spatial Area.</p> <p>The extensive, mature tree line which bounds the eastern curtilage of Blaen Baglan Primary School and Maes Ty Canol forms a defensive barrier separating the built form of eastern Baglan from surrounding countryside, and should be fully preserved. Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs.</p> <p>It advocates that sites should avoid being allocated where there is the potential harm and damage to the local landscape, and that the countryside should be protected for its own sake.</p> <p>The site was allocated within the Neath-Port Talbot Unitary Development as a Housing Allocation, however despite the adoption of that Plan in 2008, the site does not benefit from planning permission. As such, its continued presence as a housing site within a subsequent Development Plan must call into question its deliverability to the market.</p> <p>The LDP does not contain any Deliverability Statement to illustrate which, if any of the Housing Site Allocations can genuinely come forward for development within the Plan Period. The complete absence of any meaningful attempt to deliver this site must</p>	H1/12 Blaenbaglan School (land to rear of), Baglan

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					<p>form a significant material consideration as to whether it should be allocated within this development plan.</p> <p>The site should not contribute to the allocation of housing under Policy H1 for the above reasons. Its allocation of 141 units should be re-distributed elsewhere in the Port Talbot Spatial Area.</p>	
Dep273	Mr Lennard Powell		335574	Object	<p>I would contend that this site is unsuitable for housing development for the following reasons:</p> <p>1. Although the site is not a designated SINC the site is open field farm land, and falls under the LDP Policy EN7 Paragraph 5.3.37. It is surrounded by hedgerows. The site is adjacent to an area of woodland which is home to a variety of wildlife including protected species. The noise and light pollution of a 141 house development would drive all of the above species from the area.</p> <p>2. The site is approximately 160 Metres above sea level at the top of a steep incline. Existing households in the immediate area predominantly use the motor car as their preferred mode of transport for both travel to work and social events, as the location of the site makes cycling and walking prohibitive. The timing of the public transport service is currently unsuitable for travel to work and social purposes, and has not improved in the past 23 years. Recent housing developments in the immediate area have increased car usage and the current average car ownership in the immediate area is of the order of 2 cars per household. The proposed housing development (141 houses) would result in an increase of 282 motor cars in the area. The carbon footprint of 282 motor vehicles (manufacture, running and replacement) is unsustainable. I contend that this renders your Policy SP20 5.4.1 statement 7 and SP20 paragraph 5.4.4 contradictory to the proposed development of the site, and renders the Plan unsound.</p>	H1/12 Blaenbaglan School (land to rear of), Baglan
Dep615	Mr V Price		196316	Object	<p>H1/12 The site is constrained by flood risk and has significant traffic problems. The new proposal for c141 dwellings at Blaenbaglan School would be inappropriate given the need to plan for the consequences of climate change and reduce the risk of flooding.</p>	H1/12 Blaenbaglan School (land to rear of), Baglan
Dep1366	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p>	H1/12 Blaenbaglan School (land to rear of), Baglan

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					<p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep623	Mr V Price		196316	Object	<p>Land at Hawthorn Close would introduce large-scale development onto a greenfield site that is detached from the settlement of Cwmafan.</p> <p>Land at Western Logs would also be highly inappropriate for a housing development, being visible within the landscape from Cwmafan, detached from the settlement itself and located on a very bad junction (as is the land at Hawthorn Close). There are few services or facilities located here; the links to Cwmafan are not conducive to walking or cycling. It is noted from table 6.1 that these two sites are expected to be implemented by the private sector. It is therefore important for the Inspector to ask for evidence that these sites are capable of being delivered by the private sector. What interest is there from the development industry?</p>	H1/13 Hawthorn Close, Cwmafan
Dep1367	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p>	H1/13 Hawthorn Close, Cwmafan

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					<p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep626	Mr V Price		196316	Object	<p>Land at Western Logs would be highly inappropriate for a housing development, being visible within the landscape from Cwmafan, detached from the settlement itself and located on a very bad junction (as is the land at Hawthorn Close).</p> <p>There are few services or facilities located here; the links to Cwmafan are not conducive to walking or cycling.</p> <p>Furthermore there is a former open-cast mine that was subsequently used as a rubbish tip immediately adjacent to Western Logs, which will have had an impact on the ground conditions, will create potential amenity issues and overall leads to a conclusion that Western Logs should not be allocated for housing.</p> <p>It is noted from table 6.1 that these two sites are expected to be implemented by the private sector. It is therefore important for the Inspector to ask for evidence that these sites are capable of being delivered by the private sector. What interest is there from the development industry?</p>	H1/14 Western Logs, Cwmafan
Dep442	Mr Eric Lewis		324744	Object	<p>Housing Site H1/20 lies at a frontage position off the northern flank of Purcell Avenue, but backing onto a significant Employment Allocation EC1/1, which includes land set aside for a Waste Treatment Facility Site W1/1(a) at Baglan Moors.</p> <p>The site consists of some 3.5 hectares of generally level land, has characteristics more related to the adjoining industrial units at Purcell Road and Endeavour Close to the immediate western perimeter, rather than housing off the southern side of Purcell Avenue. That highway is considerably wide, with grassed central reservation, aiding to buffer the effects of employment and industrial development from the established residential areas of Sandfields. The development of H1/20 would be unrelated to the general spatial pattern of housing with this part of the Port Talbot Spatial Area.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. It advocates that sites should avoid being allocated where there is the potential harm to</p>	H1/20 Purcell Avenue, Sandfields

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					<p>the occupiers of new residential properties from adjoining competing land uses, particularly those of an industrial nature, which often can lead to environmental concerns over noise, dust, odour, general disturbance and heavy traffic movement. The promotion of the Baglan Moors site as a major receptor of waste within the County Borough in close proximity to this allocated housing site will undoubtedly attract environmental concerns.</p> <p>The site was not allocated within the Neath-Port Talbot Unitary Development Plan as a Housing Allocation, but as part of Employment Allocation EC1/1, which suggests its physical connectivity to that overall employment designation is more adapt than a separate housing site under the LDP.</p> <p>The LDP does not contain any Deliverability Statement to illustrate which, if any of the Housing Site Allocations can genuinely come forward for development within the Plan Period. The complete absence of any meaningful attempt to deliver this site must form a significant material consideration as to whether it should be allocated within this development plan.</p> <p>The site should not contribute to the allocation of housing under Policy H1 for the above reasons. Its allocation of 115 units should be re-distributed elsewhere in the Port Talbot Spatial Area.</p>	
Dep1368	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our</p>	H1/23 Park Avenue, Glynneath

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					<p>brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep501	Mr R Lanchbury	Cilybebyll Community Council	196345	Object	<p>Council believes that the allocation of a site for 52 houses at Brynmorgrug Alltwn will represent an inappropriate extension of the built up area, compounding access issues which already prevail, and raising serious infrastructure and deliverability questions.</p> <p>The site is immediately adjacent to a Landbank Site (H1/LB/30), and other developments have taken place or been mooted in the immediate vicinity, without any consideration of an integrated and properly funded infrastructure plan. An incremental approach is evident, and if allowed, all of these developments could result in over 150 dwellings being provided in this part of Alltwn, at the end of a long "cul-de-sac" with only one access and egress. All would be served from Lon Hir and its junction with the A474 Graig Road roundabout. No provision has been made through existing consents, submitted applications or in the Deposit Draft for investment in alternative or improved highway access, either directly in to the site, or to the wider highway network serving this area. Access and egress from and to the wider highway network would be along Lon Hir, which has a wholly inadequate junction with the A474 Graig Road roundabout, beset with parking problems which narrow the carriageway causing congestion. On this basis, it is considered that H1/24 and any undetermined planning applications should not be allowed.</p> <p>The allocation of H1/24, in conjunction with other ongoing developments and proposed allocations in the Deposit Draft in Alltwn, is likely to generate significant pressure on the limited services which are currently available in the community, thereby adversely affecting its character. In particular, the school is operating near capacity already and would need further investment to accommodate any expansion through development within its catchment. Whilst other strategies, particularly the NPT Valleys Strategy and the NPT Community Strategy, stress the need for an integrated approach to community provision so that communities are sustainable, the imposition of 150+ dwellings in Alltwn without comparable investment in facilities will unduly place the settlement under pressure. There does not appear to be any positive presumption in the Deposit Draft to address this deficiency in an integrated manner.</p> <p>Council recognises that some provision for development is already committed in Alltwn through a Landbank allocation currently being implemented (H1/LB/30), but it is clear that its implementation is hampered by deliverability issues. To compound the problems currently arising from the existing development with a further allocation would be perverse, and particularly so when there is a serious question over deliverability as evidenced by the current development. Council considers that the proposed site at Brynmorgrug would compound existing problems, contribute to pressures on existing services, and is inappropriate in highway terms. On that basis, H1/24 Brynmorgrug (Phase 2) should be deleted from the Deposit Draft.</p>	H1/24 Bryn Morgrug (Phase 2), Alltwn
Dep509	Mr David Lewis		784929	Object	<p>The site is part of a development which received planning permission in 1972 -74. That consent saw several phases of incremental development staggered over the last 40 ish years. When the consent was given there were to separate highways into and out of this part of Alltwn. The Graig Road improvements in the 80's - 90's saw the extinguishment of the one of those roads. The whole of the existing houses involving Lon Hir, Edward Street, and Bryn Morgrug constitutes a cul-de-sac served by an entrance off the Alltwn Roundabout which is clearly substandard and often restricted to a single lane entrance. Tail backs in and out of Lon Hir are common at peak traffic hours.</p> <p>I have made repeated representations to the planners that the development of 150 houses off a cul-de-sac is ridiculous without an additional access being provided to the area of proposed developments</p>	H1/24 Bryn Morgrug (Phase 2), Alltwn

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Again, repeated requests for investigations into additional routes in the area of development off the A4067 below. A possible route has been identified but any talk of it being built has been met with the incremental development of the three separate components would not justify the imposition of the cost of the road.. However, if the development was seen as a coherent integrated site then the cost could be justified.</p> <p>Should The Land Bank Site Hi/LB/30), H1/24 and the Industrial Estate be submitted as an integrated development with access off the A4067 being provided I would withdraw my objections.</p> <p>A further important point concerns the deliverability of developments on the three sites, be they integrated into coherent development or not, must recognise the current development is not selling. Redrow, the current developers, have made repeated representations to me that Local Authority/ WG regulations on house builders makes sites such as this one nonviable now and in the future.</p>	
Dep421	Mr Hywel Morgan		785350	Object	<p>I would like to object to the inclusion of this allocation in the Local Development Plan (LDP) for the following reasons</p> <ol style="list-style-type: none"> 1. The proposal does not include the WDA site at the end of Lon Hir (Phase 3) which has also been the subject of a planning enquiries and possibly an application for over 50 houses. If 'phase 3' was included within the proposal (I view it as underhanded that it is not) it would take the proposed development to over 150 houses. Also, I am led to believe that Redrow now owns this site which further indicates it's intention to develop it. 2. The fact is, there is only one entrance and exit to Lon Hir, Edward Street, Bryn Morgrug and now Alltwen Gardens (phase 1, 2 & 3) which means the entire area has become a giant cul de sac. I believe the development has been purposely 'phased' in order to avoid legislation with regards limiting the scale of development in relation to a cul de sac. This needs to be re-assessed. 3. When planning was originally awarded for the Bryn Morgrug development there were 2 access routes via Lon Hir & Edward Street , with a third entrance cut in from Graig road (although this never became a finished road, the fact it was proposed and marked out at the time highlighted the need for an additional road to service the Bryn Morgrug development). 4. The road traffic capacity of Lon Hir should be reviewed. Due to residents parking close to the entrance of Lon Hir it effectively becomes a single narrow lane often causing a bottle neck out on to the roundabout. It is only a matter of time before an accident occurs due to cars queuing to enter Lon Hir and traffic hurtling onto the roundabout via the fly over bridge. The risk of this will increase significantly if a further 150 + houses are built and traffic volumes are increased by at least 150 cars, though a more accurate figure would probably be closer to 300 cars considering the current norm for multi car ownership per household. 5. Point 4 is also made worse due the Alltwen primary school run, with cars parking at the entrance to Lon Hir further exacerbating the access situation at peak periods of the day when people are going to and in some cases returning from work. Add to that a further possible 150+ households doing the same and the problems will escalate. 6. As Lon Hir is the only access point to Edward Street, Bryn Morgrug and now Alltwen Gardens if an accident or blockage was to occur at the entrance or on the roundabout it would effectively prevent the emergency services reaching anyone beyond the entrance. A blockage for whatever reason at the entrance would also prevent around 500 people from leaving there homes to carry out there daily business. 7. The road layout at the end of Lon Hir is totally unsuitable to carry any large volume of traffic, the 2 right hand 'blind corners' create a dangerous pedestrian crossing area (especially for children & the elderly). 8. I'm aware that two thirds of the proposed development sits outside the current village boundary contravening current regulations. 9. If the development is given the go ahead then phase 1,2 & 3 should be viewed as a whole. Due to its scale the development must include as a condition for the developers a new and separate access either off Graig Road (as originally intended many years ago) or from the A4067 below. There is precedent for this as an additional entrance was constructed for the Persimmon development at Gelli Gron, Pontardawe. 	H1/24 Bryn Morgrug (Phase 2), Alltwen
Dep474	Mr David		786184	Object	As a family we have been residents of Lon Hir for the past 65 years, during such time have endured several development issues which have affected our lives with little or scant regard to any objections or suggestions made by us to the authority. We are	H1/24 Bryn Morgrug (Phase

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
	Morgan				<p>confirming our objection to the proposed inclusion of this allocation in the LDP on the basis that it is ill conceived with a complete lack of consideration and thought for the safety of families living on Lon Hir, Edward Street and Brynmorgrug. Our objection are based on the following reasons :-</p> <p>We have been duly informed that the proposed development sits outside the current village boundary thus contravening current regulations, 2/3 of the development sits outside the current village boundary/village envelope therefore based on current Planning Policy this development should not be considered and therefore be refused.</p> <p>Access to Lon Hir from the roundabout at present is totally inadequate for the amount of traffic usage, this to the residents is patently obvious and is compounded when parents on the "school run" owing to the lack of parking spaces park on both sides of the street reducing the passage of traffic down to one lane. Surely planning to increase the traffic flow will cause additional dangers to the already dangerous situation that exists on the road and roundabout for all including pedestrians. This single access to what is an enclosed residential area is a major concern to us all, should an accident or an incident requiring the road to be closed then there would be no access or egress for residents or the emergency services. In view of the proposed development of the additional 150 houses (phase 3 current WDA industrial site which is already owned by Redrow must be included) then the probable increase in traffic volume could be around a further 300 cars plus service vehicles etc, surely this situation must be of concern to the authorities when they deliberate over allowing such a plan.</p> <p>When the consent was granted in 1972/74 for the original 100+ houses on the Bryn Morgrug site there existed two roads from the site via Edward Street and Lon Hir, this is no longer the case, now the roads from Brynmorgrug to Lon Hir being the only access and provides a totally substandard and dangerous facility for the residents of Brynmorgrug and Edward Street.</p> <p>The entire area is a cul de sac and planning and highways legislation relating to cul de sac access should be legally adopted.</p> <p>We strongly request that the authority refuse the planning permission for this development and insist that before any plans for further potential development, take time to reconsider a comprehensive revue of the whole area and include in their deliberations a separate access to either Graig Road or the A4067 below or both.</p> <p>It is our opinion that the authority should have insisted the developer constructs and finance new access ways to the new site. The authority in our opinion have not represented the needs of the residence in not insisting that the access ways have not been given due consideration.</p>	2), Alltwen
Dep910	Miss Bethan Jenkins AM		473974	Object	<p>Residents have raised concerns that the village is in danger of becoming congested with traffic and that pupils walking to the local primary school may face safety risks. A resident has said that all traffic will have to enter and leave along Lon Hir which leads out directly on to Alltwen Primary School, and the safety of the children walking to school will be put at risk.</p> <p>There is also concern that the school could become oversubscribed. A recent Estyn inspection showed that the school is underachieving, and added pressure could drive down the standards.</p> <p>The plan for further housing on Ynysymond Road would also add more congestion and vehicles, and the development is on a site with significant biodiversity issues, and the access route to this site is also inadequate.</p> <p>The Local Development Plan does not recognise the site that has been the subject of planning enquiry and possibly an application. If this were taken into account the bottom of Lon Hir would see in excess of 150 new houses, this is without taking into account the already in place Redrow phase one site of 57 houses.</p> <p>Should these areas be approved for development, there is concern that Alltwen will be moving away from its village status due to being hugely overpopulated.</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen
Dep860	Mr Huw		782389	Object	<p>Inadequate allocations in Pontardawe which has been identified as a Strategic Growth Area (Para. 2.3.12) and a key settlement in delivering sustainable growth - a number of the sites identified do not at present have planning permission.</p>	H1/24 Bryn Morgrug (Phase

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	Thomas					2), Alltwen
Dep850	Mrs Rhian John		786394	Object	<p>I would like to put my objections about the planning for the houses that have be submitted for Lon Hir, Alltwen Pontardawe, the traffic on the road is so dangerous now i would not like to see how it will be if any more dwellings are built here.</p> <p>Our schools would be at bursting point.</p> <p>Houses are still vacant.</p> <p>Wildlife is being left with no habitat! We have a lot of wildlife in the area including protected species.</p> <p>The new park which has just been revamped would not be sufficient for more houses.</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen
Dep870	Laura Tams		786576	Object	<p>I wish to object to the potential housing developments highlighted in the LDP in relation to Bryn Morgrug phase 1 & 2 and also Ynysymond Road, Alltwen.</p> <p>In relation to H1/24 and H1/LB/30 (Brynmorgrug Phase 1 and 2) I am astonished that this is even being considered, as a Community Councillor I am constantly being stopped by my constituents who have serious concerns over the inadequate highway infrastructure at Lon Hir (the only entrance and access to this proposed site) this highway already has safety concerns for both vehicles and pedestrians. A second access route would be essential for any further developments within this already over crowded area. I would politely remind Officers of NPTCBC of the Persimmon Homes development at Gelli Gron who were required to build a new entrance to their site - why is this area with Bryn Morgrug any different? The area is a cul-de-sac and as such has legislative restrictions - why are NPT Officers disregarding this fact?</p> <p>This area has already seen an increase with Redrow building some 57 homes, and any further development will cause chaos on what are already overused road's (Lon Hir and Edward Street). Edward Street is constantly seeing vehicles accessing the area the wrong way - this is somewhat down to poor one way signage but also undoubtedly the new estate created by Redrow and incorrect information from Satellite Navigation Units.</p> <p>Further more the LDP does not recognise the 'WDA'site that has been the subject of planning enquiry and possibly an application. If this were taken into account the bottom of Lon Hir would see additional houses in excess of 150, this is without taking into account the already agreed Redrow phase one site of 57 houses.</p> <p>To conclude on this site the three potential sites should form one sensible planning application.</p> <p>Should these areas be approved for development Alltwen will be moving away from its village status due to being hugely overpopulated. Schools and other public facilities within the area will be flooded - a recent ESTYN inspection showed that the school is not performing well, we do not need added pressure on the School with potentially 200+ children that would need school places from some 160 suggested homes.</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen
Dep876	A.K. Taylor		786579	Object	<p>I am writing to object to the LDP that has proposed an extra 200 houses in the village of Alltwen. There is already an insufficient road structure throughout the village of Alltwen, leading to the town of Pontardawe and cannot believe there is no road improvement plan to support the proposed housing plans. Ynysymond is surrounded by narrow, winding country roads which locals are already wary of using because of the miss-use of other drivers driving dangerously. However I am even more concerned with the proposed plan of adding another 51 houses (Phase 2) to the end of the Lon Hir, Brynmorgrug and Edward Street where 56 houses have already been built (Phase 1). There is only one entrance and exit along Lon Hir for the 200 plus houses already built and yet there is a proposal for another 51 houses in place with no plans to introduce a second entrance and exit. When the Phase 1 planning was granted in the 70's there were 2 entrances and exits to this cu-de-sac with a 3rd proposed and leading onto Graig Road. My concerns are increased because I know that Redrow have bought the Aladdin Industrial Estate and believe there will be another 100 houses proposed to be built on this land. The road along Lon Hir is not a main road and was not built to support this much traffic. Most residents park off the road on their drives and are already struggling to leave and join the road because of the increase of traffic and</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen

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					<p>the speed cars travel down Lon Hir despite the road bumps. Dangerously (due to there being only one road leading to this cul-de-sac) any emergency needing the road to be shut, would cut off all residents resulting in no one being able to enter or leave the cul-de-sac. My other concern is the traffic on the roundabout outside the school, and the other roundabouts leading to the town centre and towards Tesco. There is already a heavy build up of traffic and at times vehicle queues are backing up from one roundabout to another. Can Pontardawe, a town with the 2nd highest vehicle collision rate (Road Safety data), cope with more traffic? As well as the insufficient road structures, Alltwen Primary School already has a very high pupil intake and Estyn has requested that the school must not be put under anymore pressure so where would the children from these new estates go to school?</p> <p>Overall I cannot see how the proposed LDP for the village of Alltwen can be seriously taken into account as I have only touched on the objections I and others have. I have not mentioned the poor sewerage systems that Alltwen has and the increase other local services will endure such as the Health Service, Fire Service to name a few.</p>	
Dep891	Mrs Nicola O'Sullivan		786580	Object	<p>I wish to raise my objections regarding the LDP and its proposals regarding Alltwen.</p> <p>The specific areas I oppose are: H1/LB/30 Bryn Morgrug (Phase 1) (56 houses) and H1/24 Bryn Morgrug (Phase 2) (52 houses).</p> <p>I object to these on the following grounds:</p> <ul style="list-style-type: none"> • Phase 1 and 2 are in addition to the development at Alltwen Gardens and the additional planning proposal for houses on the old factory site. This would add an additional 200 houses to this small area and have a significant detrimental impact on residents already living in the area. • There are already traffic and highway issues for residents since the development of Alltwen Gardens, at certain times of the day cars wishing to enter Lon Hir have to wait on the roundabout as cars double park and mean only one car either way can enter. • The road is not adequate to service this level of traffic, there is a single access into a cul-de-sac and the addition of a further 200 houses, with the additional traffic will present safety issues - if there is an accident / gas leak etc the whole cul de sac is cordoned off with no access. • The junction entering Lon Hir struggles with existing traffic, it is likely to get worse and will not cope with the additional traffic. The road between Lon Hir and Brynmorgrug is not adequate to manage the additional traffic. • Pontardawe already has the 2nd highest collision in Neath Port Talbot and I can only see this development having a further negative impact on this figure. • A development of this magnitude would necessitate an additional entrance/ exist to make it safe or viable. • There are concerns about the drainage and the wildlife that already exists on these sites. • Phase 2 is a proposal outside the village boundary, which is not acceptable. <p>These proposals together would have a significant and detrimental effect on the village of Alltwen, it will detrimentally affect the character of the village.</p> <p>I question whether the impact of development of this scale and magnitude had considered the impact on local infrastructure as well as the capacity of local schools and healthcare providers to accommodate growth of this scale.</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen
Dep853	Nicola Woodrow		786630	Object	<p>I am writing to strongly object to the proposal for building more houses at the end of Lon Hir in Alltwen. As a parent of 2 children that attend Alltwen Primary School, I have several concerns.</p> <p>1) Alltwen Primary has severe parking issues already, and if more families move into the area, they are likely to park near the roundabout on Lon Hir, especially as this is where the current only school crossing patrol is stationed. This road entrance is already congested, and this causes traffic jams both on the road entrance and on the roundabout. This in turn causes dangerous driving at busy school times when there are children running around and is an accident waiting to happen.</p> <p>2) There has already been development of a site nr Lon Hir (Alltwen Gardens - Redrow), which has put strain on the road structure, both from construction traffic and new residents. As this is, effectively a huge cul-de-sac (there is no other road exit than that at the end of Lon Hir), it seems inoperable to increase residential traffic further. It is already difficult to turn around on Lon Hir, and I fear</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen

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					<p>that an increase in traffic temporarily 'trapped' on this road due to unsustainable numbers of cars, would lead to accidents.</p> <p>3) Alltwen Primary measured poorly in its last Estyn inspection. It is a small village school, and if we greatly increase the size of the village due to more building, then we run the risk of class sizes being increased again, putting extra strain on teachers who are already struggling to raise standards so our children can get a decent education.</p> <p>I urge you to consider these points, as well as the objections of other local residents. I personally am not a resident of Alltwen, so I do not write to you through any fear of house price decrease or for any personal gain. It is clear to me what a detrimental effect these plans would have on the community of Alltwen. Please look beyond the financial gain and focus on what is really important in this world: quality of living, education, safety and a strong and happy community.</p>	
Dep857	Elizabeth Jones		786632	Object	<p>The deposit plan identifies Pontardawe as a language sensitive area, and key issue 18 states that "the erosion of the Welsh language is a concern in many of the valley communities". Pontardawe has also been identified as a strategic growth area, and therefore has considerable housing allocations, and is classified as a town in table 3.1 in the deposit plan. Alltwen is classified as a 'small local centre' in the same table. Over 25% of the housing allocation for Pontardawe is sited in Alltwen.</p> <p>The Sustainability Appraisal notes that the Menter Iaith Castell Nedd Port Talbot study of the new housing development in Godre'r Graig and supplementary study in Ystradgynlais concluded that large scale housing development in the Swansea valley will tend to contain a lower percentage of Welsh speakers [when compared with the area of existing housing] and as such will have an impact on the fabric of the community. The Sustainability Appraisal also finds that the allocations in Pontardawe are likely to have a negative impact on the linguistic balance of the area. Neath Port Talbot Council's Neighbourhood Profile for Alltwen Ward (using data from the 2001 UK census) states that there are 916 households in Alltwen. The allocation set out in the deposit plan will increase the households in Alltwen by 17%. This is a considerable increase. There is therefore an inconsistency between the Sustainability Appraisal and the allocations in the deposit plan, and despite evidence demonstrating that new developments have an impact on the fabric of the community, and a negative impact on the linguistic balance of the community, Alltwen, part of that area identified as a language sensitive area, has a considerable housing allocation. The measures proposed to address the negative impact on the Welsh language cannot be trusted with any measure of guarantee to have any positive influence whatsoever. The deposit plan notes that Neath Port Talbot's Single Integrated Plan vision is to "create a Neath Port Talbot where everyone has an equal opportunity to be healthier, happier, safer and prosperous". In the community of Alltwen, where the proposed development is likely to have a negative impact on the fabric of the community, there would seem to be very little opportunity to be happier, and to ensure the plan is made sound these three allocations in Alltwen need to be removed.</p> <p>The impact on local schools has, in my view, not been taken into account. A recent Estyn report on Alltwen showed that the school was underachieving: with a large influx of children from the additional houses resulting from this plan will put additional pressure on the school.</p> <p>In addition the transport section does not reflect the issues accompanying the allocations. There already exist problems in the Lon Hir/Edward Street/Brynmorgrug area of Alltwen, where, due to council changes to the road system in the past, there now exists a large cul de sac with congested entrance/exit. With the additional cars using these roads as a result of H1/LB/30 and the proposed H1/24 (and possibly even more houses in the future) - an additional 108 houses at minimum - this situation will get worse. Should there be an accident or incident leading to the entrance to Lon Hir being blocked there would be no road access to the area for either residents or emergency vehicles. A new, separate, access to either Graig Road (A474) or the A4067 should be required as part of any new development here.</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen
Dep1369	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a</p>	H1/24 Bryn Morgrug (Phase 2), Alltwen

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					<p>72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep190	Mr Stephen Keauffling		329740	Object	<p>I would like to object to the inclusion of this allocation in the Local Development Plan (LDP) for the following reasons:</p> <ol style="list-style-type: none"> 1. In 2007, on the recommendation of the Planning Inspector appointed by Welsh Government, Ms Susan Holland, the allocation H1/36 Ynysymond, Alltwen (now H1/25) was removed from the NPT Unitary Development Plan (UDP) because of significant biodiversity issues. Its inclusion in the LDP without modification is therefore inappropriate. 2. In 2007 the Planning Inspector recommended that the land be managed by NPT as a UK biodiversity priority habitat because of the presence of the Double Line Moth. To my knowledge this was not done. Although this moth is no longer a Biodiversity Action Plan (BAP) species, it is protected by the NPT Biodiversity Action Plan 2008-2012 (DL02PS - Protect Double Line Moth from harm or loss from sites). This plan is still current as stated on the NPT website today, "The local biodiversity action plan is being reviewed but for the moment the 2008-2012 version is still being applied." Use of the land for building would clearly be precluded and would 	H1/25 Ynysymond Road, Alltwen

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					<p>be subject to legal challenge.</p> <p>3. The Purple Moor Grass /Rush (Rhos) Pasture is also protected by NPT BAP (PMGRP01ME - Maintain current extent of Purple Moor Grass and Rush Pastures in Neath Port Talbot). Any building that included loss and / or damage through drainage of this habitat would also be precluded and subject to legal challenge.</p> <p>4. Changes have been made to the LDP that significantly affect the number of houses planned for this allocation. In the Planning Inspector's report The NPT Highways representative reported that based on UK Government Policy on Access, the current access arrangements to the site would support only 25 dwellings. Despite there being no apparent change to UK Government Policy, the number of buildings planned has risen from 25 to 50.</p> <p>5. Other suitable prospective sites for building were identified by both the UDP and LDP. No specific reasons for the inclusion of H1/25 in the NPT LDP are cited that provide satisfactory explanation for the overturning of the Inspector's recommendations.</p> <p>It appears that NPT has therefore wasted a great deal of taxpayer's money by writing and issuing policies that can be disregarded when it no longer suits the Council, along with the Recommendations of the Inquiry in 2005/6.</p>	
Dep498	Mr R Lanchbury	Cilybebyll Community Council	196345	Object	<p>Council believes that the allocation of a site for 50 houses in Ynysymond Road Alltwen will represent an inappropriate extension of the built up area into a green space that has biodiversity value, and result in an unacceptable increase in traffic movements at a busy location in the village.</p> <p>The site has previously been considered and discounted by a Planning Inspector as a potential residential development site. The existence of the Double Line Moth and Purple Moor Grass/Rush has been recognised in the NPT Biodiversity Action Plan, and accordingly, site should remain undeveloped and the Deposit Draft proposal is inconsistent with the aspirations of that Action Plan in seeking to protect the habitats.</p> <p>Access and egress on to Ynysymond Road is proposed through a narrow gap in existing development with inadequate potential for appropriate sight lines along the road. Ynysymond Road itself is a heavily trafficked highway with speed reduction measures in place, and is used consistently as a means of accessing and egressing the village from and to the south. As such it is used by many as a "rat run" to avoid congestion that occurs in Pontardawe and on the A4067 Swansea Valley By-pass, but is itself a residential street subject to traffic conflicts.</p> <p>The allocation of this site, in conjunction with other ongoing developments and proposed allocations in the Deposit Draft, is likely to generate significant pressure on the limited services which are currently available in the community, thereby adversely affecting its character. In particular, the school is operating near capacity already and would need further investment to accommodate any expansion through development within its catchment. Whilst other strategies, particularly the NPT Valleys Strategy and the NPT Community Strategy, stress the need for an integrated approach to community provision so that communities are sustainable, the imposition of 150+ dwellings in Alltwen without comparable investment in facilities will unduly place the settlement under pressure. There does not appear to be any positive presumption in the Deposit Draft to address this deficiency in an integrated manner.</p> <p>Council recognises that some provision for development has already been made in Alltwen through a Landbank allocation currently being implemented (H1/LB/30), although it is clear that its implementation is hampered by deliverability issues. The proposed site at Ynysymond Road would not make a significant contribution to housing provision, but it would contribute to pressures on existing services, and is inappropriate in both biodiversity and highway terms. On that basis, H1/25 Ynysymond Road should be deleted from the Deposit Draft.</p>	H1/25 Ynysymond Road, Alltwen
Dep404	Mr Brian Thompson		331598	Object	I would like to object to the inclusion of this allocation (H1/25) Ynysymond Road in the Local Development Plan (LDP) for the following reasons:	H1/25 Ynysymond Road, Alltwen

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					<p>1. Having researched the recent housing and planning policies set out by the Welsh Assembly Government (WAG) I understand that they base housing projections on recent trends reported by a number of organisations dealing in housing and census statistics. I also gather that they have adopted a different method of calculating the future housing requirements than the rest of the United Kingdom. This new method is as yet not proven to be a better method than that used in the past and once again we in Wales appear to be the "guinea pigs" for the WAG's attempts to go its own way, but that is another matter.</p> <p>I note that the projections being used in NPT follow the "trend" of the period between 2003 and 2008 which saw an abnormally strong population growth in the county compared to the longer spanned 1981-2003 period. In fact between 1996 and 2006 the authority's population decreased by 0.2% and the population in the county is only now at the same level as it was in the early 1980's.</p> <p>I would seriously question the soundness in using these short term 2003-2008 figures as being the most appropriate for planning growth over the long term 15 year LDP period. To compound this over optimistic trend whilst NPT have modelled a range of population projections they took as their starting point what appears to be the "Very Highest" scenario (8554 houses) as set out in the Welsh Government 2008-based household projections. This was 36% higher than the figures (6280 houses) they set out in the public pre-deposition presentations as their preferred "Growth and Spatial Options". These early much lower figures were presented to the public in numerous meetings held by the council around the area and most people who do not wish to plough through the mountain of paperwork generated by this LDP exercise may well have taken this original publicized option of 6280 houses (quoted as just 50 houses for Pontardawe) as the figure now being processed through the final stages of the LDP system. There seems to have been a major sea-change in the council's stance since the early LDP consultation period and they have come up with a brand new "Changed Option". NPT have reduced the very highest scenario taken at the commencement of their changed option to now be around 31% higher for their final considerations however this now requires over 8200 new houses to be built to satisfy their new elevated projections. I would conclude that this is completely unrealistic and when linked with the abnormal growth seen in NPT population over the "trend" period almost certain to produce an over estimation of the housing requirement in the county.</p> <p>Further to this, given the unusual world situation since 2008 with regards to the global/local economy(s) and in particular the "flat" housing market, I would suggest that the methodology adopted by NPT in projecting constantly rising housing requirements has failed in its first few years and therefore is so flawed as to be unsound.</p> <p>As an explanation for this massive change to their plans I note that far from doing their own assessments and calculations NPT have relied heavily on a private consultancy firm, Peter Brett Associates from Reading, to undertake an economic study linked to house building. Peter Brett is a well-known firm who are intimately involved and work extensively with private housing developers. I have no doubt the "Chinese walls" argument will be invoked over this matter but I am uneasy that public bodies are falling back on consultancies that work extensively for the very people in whose interest it is to have an extensive permitted landbank of development land made available.</p> <p>Before using these constantly rising population figures NPT should fully explain why and how the county is going to be the focus of a surge in population the like of which we have not seen since the start of the industrial revolution. The WAG government have expressed the political wish to make the area an attractive zone for jobs and inward investment but I have no doubt WAG would say this for all areas of Wales. This is a fine political ambition but without concrete policies to state how it is going to be achieved it should not be the basis of a local authority's house building projections. I can see no value to the community in pursuing this pie in the sky methodology without historic migration figures being given their due weighting. If the economic miracle fails to materialise as "hoped for" by the council then all those house builders will be able to pick and choose which community to overdevelop to get a maximum profit. Of course the number of houses will be kept below limits that allow them to argue successfully with NPT against having to pick up the tab for new road access networks or properly sized sewers. This has happened in Rhos with Delffordd and is heading that way with the developments at the end of LonHir / Bryn Morgruig.</p> <p>It should not be beyond the scope of this process to develop a housing plan that contains a sliding option with primary and secondary sites that could react to any abnormal demand due to a rise in population levels. If the population does rise as "hoped for" along with economic regeneration then a second tier of sites could be brought in. This second tier should not be made available to developers in the first instance. The primary housing landbank should be concentrated in certain non-contentious areas such as Coed Darcy, which</p>	

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					<p>include new roads and infrastructure properly designed to cater for the number of dwellings built. Other more debatable areas such as Ynysymond where addition housing will stretch community resources past reasonable levels should be made unavailable until the primary zones are full. At the moment it is a free for all with communities losing out every time to the profits of developers. It is time the local authorities started listening and looking after the locals and localities better rather than trying to be "big government".</p> <p>2. In 2007, the Planning Inspector appointed by Welsh Government, Ms Susan Holland, recommended that the then proposed allocation H1/36 Ynysymond, Alltwen (now H1/25) be removed from the NPT Unitary Development Plan (UDP) because of significant biodiversity issues.</p> <p>The fields on both sides of Ynysymond road are excellent examples of purple Moor Grass Pasture which is protected by NPT biodiversity action program. This marshy grassland occurs on poorly drained, mainly acidic sites in lowland areas with high rainfall and wet soils and is a reducing habitat identified as being in need of protection. In the past, purple moor grass and rush pasture was cut for hay during dry summers, but this practice is now in decline. Today, only a few sites such as those around Ynysymond road are managed as hay meadows, and most are kept as rough grazing for cattle and horses. It is known as being particularly important for its populations of marsh fritillary and brown hairstreak butterflies (UK BAP priority species).</p> <p>As regards the former an environmental impact study was submitted to accompany site P46 located to the south east of Ynysymond road (just across the road from H1/25), when the candidate sites were first being proposed, which identified devils bit scabious, well known as being favoured as the main larval food plant by the marsh fritillary. In fact this plant is often used to monitor the potential wellbeing of the species and is evidence or the rich biodiversity identified by NPT in the past as being present in these fields surrounding the community of Alltwen. The EIA was withdrawn by the proposer of P46 but it should have been recorded by the planning authority as having been lodged at one time.</p> <p>The present inclusion in the proposed LDP of Ynysymond Road without an overriding environmental case being put forward by the authority is therefore unsound and given other NPT policies concerning local biodiversity currently in force may be subject to legal challenge.</p> <p>3. In 2007 the Planning Inspector heard from the NPT Highways representative that with the current road network and access arrangements this site would only support 25 houses. There have been no changes to the local road network and indeed for the construction of the VHP gas pipe that is located at the end of Ynysymond road the contractor established a temporary entrance straight off the main A4064 trunk road for site traffic in recognition of the serious imposition the additional traffic would have on the village of Alltwen.</p> <p>There has been a regular stream of traffic accidents in Gwyn street and Ynysymond road over the years that can be confirmed by the police and fire brigade records, resulting unfortunately in a death some years ago. The road is unfortunately has always been a convenient "rat run" for vehicles heading up and down the Swansea valley from the eastern side. If this site is to be seriously considered then it should be conditional on any developer providing a new access from the trunk road as part of any scheme.</p> <p>Any argument that 50 houses would not warrant such an expense should be of no importance in planning terms. It should be a matter of fact that when the housing density reaches a certain level any additional capacity should be required to shoulder the additional costs to reduce the burden on the community. This is one of a community's main weapons in combating over development by house builders who are normally driven solely by profit.</p> <p>As NPT appear not to have considered these points in their assessments the increase of housing in the Ynysymond area without a thorough review is not a sound decision.</p>	
Dep480	Mr A Thomas		338953	Object	<p>I would like to register my concerns over the proposed development of 50 homes in the Alltwen area off Ynys y Mond Road.</p> <p>Fifty homes are a small community in their own right. Time and again we see these sorts of developments taking place with no thought for current community life and how the existing community facilities will cope with such a comparatively large scale</p>	H1/25 Ynysymond Road, Alltwen

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>development.</p> <p>Alltwn has limited facilities and, increasingly, facilities are only accessible by car. This will increase the village traffic and not add to the village life or community in any way whatsoever.</p> <p>Fifty homes equals an additional 100 vehicles - how on earth are these to be accommodated safely when all roads through the village go through built up areas where children play. There does not seem to be any plans to cater for this but simply to let the current roads become even more saturated and dangerous. Added to this the already full local primary school and the already full sewer system and it is obvious that someone has really not thought this through. Planning is supposed to consider all aspects and how developments will affect areas and, hopefully, how they will enhance them, this does not.</p> <p>From the plans I have seen the only access to the site is from Ynys y Mond road. You do realise that this road is treacherous in winter and is used by commuters as a short cut on their way to the motorway. People living in this development will have the option of either driving through the village or to travel on a notoriously dangerous, and already very busy, back road.</p> <p>This is an ill thought out and dangerous proposal that will have a major affect on the character of the village and greatly increase the motoring hazards to all who live here.</p>	
Dep468	<p>Mrs Elizabeth Thompson</p>		<p>587642</p>	<p>Object</p>	<p>I would like to object to the inclusion of this allocation (H1/25) Ynysymond Road in the Local Development Plan (LDP) for the following reasons:</p> <p>1. Strategy (Plan fails P2) It is a green field site and has versatile agricultural potential.</p> <p>2.Landscape (Plan fails P2) The development of land around Ynysymond Rd would have major impacts on the local vistas, breaking an uninterrupted view of breathtaking countryside visible from the North, South and West sides of the Swansea Valley. There could be a potential adverse impact from the proximity of the VHP gas line situated 1000 yards from these potential building sites.</p> <p>3.Environmental Impacts (Plan fails P2 C2) There are important habitats/ species located on H/25 and adjacent plot P46(stage1). This includes Purple Moor grass and Rush Pasture. These grasses are known to be particularly important for the Marsh Fritillary and Brown Hairstreak butterflies (BAP U.K.) priority species.</p> <p>An environmental impact assessment was undertaken on P46 across the road from H/25 when the candidate sites were first submitted. This highlighted the presence of Devil's Bit Scabious which is the larval food for the Marsh Fritillary butterfly. These fields on either side of Ynysymond Rd create an important green corridor stretching from the River Tawe upwards to the mountain of March Hywel to the North East and Mynydd yr Abaty to the South East. Its biodiversity is rich and its plant, insect, bird and animal life must be allowed to flourish.</p> <p>The exposure and orientation of the site does not maximise resource efficiency. With the recommendation of the building of only 50 dwellings (originally 25 stated by the NPT Highways representative to the planning inspector in 2007). Insufficient profit would be generated to encourage a developer to create a separate roadway on to the A4064. This was seen as essential when the VHP gas pipeline was constructed at the top of Ynysymond Rd.</p> <p>Highways(Plan fails CE2) Ynysymond Rd is used as a "rat run" by commuters driving to the lower Swansea Valley. Speed bumps were introduced on part of Ynysymond Rd. This has failed to alleviate the problem as cars simply increase their speed on other stretches of the road. There have been numerous accidents over the years. I witnessed two incidents which resulted in the cars overturning due to their excess</p>	<p>H1/25 Ynysymond Road, Alltwn</p>

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					<p>speed. A fatality took place at the junction of Ynysymond Rd and Gwyn Street. More recently a little boy was hit by a car at the same spot. This is where a footpath crosses the road which leads to a children's grassed play area.</p> <p>Over the last 10 years 4 livery yards have opened on the Ynysymond Rd adding another hazard. Groups of horses are now ridden out of these yards several times a day along Ynysymond Rd , Gwyn Street and Derwen Rd. These are all roads which would see a heavy increase in traffic if any further developments were allowed. I sincerely hope a site visit is to be arranged so that the inspector can see the problems at first hand.</p> <p>There have been long existing problems related to inadequate sewerage/drainage systems. Replacing the present Ynysymond trunk with a slightly larger pipe is totally inadequate. The main sewer from Rhos is already severely stressed. This is only going to get worse due to the planned increase in dwellings for Rhos village. Therefore major investment is required which neither developer, local council or environmental agencies would be prepared to fund. The local council will be quite satisfied with a bit "bigger" pipe. Ask the residents of Rhos(Delffordd) who have suffered years of misery as a consequence of the piece meal planning of the local council, developers and environmental agencies. The same fate obviously awaits the residents of Ynysymond Rd and Alltwen south.</p> <p>Infrastructure (Fails P2 CE1) NPT have drastically increased the housing projection required by the LDP over the last couple of months. Originally only three quarters of the houses were proposed during their public exhibitions(2009). This suggested that Pontardawe would only need 50 houses. Now the village of Alltwen is going to get 50 houses on its southern side(Ynysymond) and 50-100 houses on its northern side(Brynmorgrug).</p> <p>The only school within walking distance of these proposed developments is Alltwen Primary. This school is oversubscribed with no plans for expansion due to financial cutbacks. Encouraging more pupils into this school without concrete plans and finances in place illustrates the complete lack of co-ordinated strategy by local government. In my opinion it has resulted in a panic reaction from NPT which could have serious long term implications on the community of Alltwen.</p>	
Dep521	Mr David Lewis		784929	Object	<p>I wish to object to the proposed Housing development on Site Reference: H1/25 Ynys y Mond Road for the following reasons:</p> <ol style="list-style-type: none"> 1. It is a wasteful use of nearly 4 Hectares of a Green Field site to house such a small (50) number of houses. 2. Taking into account of highway directives and the Inspectors guidance in the determination of the UDP 2007, when it was said that the dimensions available for the proposed entrance onto Ynysymond Road limited any development to 25 houses then the wasteful use of this prime green field site is even worse. On this score alone the planned development is fundamentally unsound. 3. In 2007, when determining the UDP proposals, the Inspector ruled that the site should be removed from the proposed plan because there were "significant biodiversity issues". The site contained a colony(s) of Double Lined Moths and substantial growths of Purple Moor Grass. Two species protected in the Authority's Biodiversity Action Plan for 2008 to 2012. This plan is still the operational policy for the authority. It is disgraceful that in the site analysis in the Draft Plan the site is described as having no problems when these two constraints still exist. Fundamentally UNSOUND judgement. 4. The site would be accessed along Gwynn Street and Ynysymond Road from the east. Both roads are substandard in width and opportunity for off road parking. The 600 meters of highway is subject to severe congestion because of on road parking for substantial amounts of each day and non stop on the weekends. Increased traffic volumes from the proposed development would have an unacceptable impact on life for residents of these roads. 5. Taken in conjunction with the proposed developments at Bryn Morgrug the Village of Alltwen could be faced with an expansion of the village by up to 200 Houses. This will have a significant detrimental impact on the local amenities, particularly the Junior School and culturally on the Welsh Language. This close knit Village enjoys a strong community spirit which would be unacceptably weakened by these proposals. 	H1/25 Ynysymond Road, Alltwen

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep475	Mrs Alison Reeves		786195	Object	<p>I would like to object to the inclusion of this allocation in the Local Development Plan (LDP) for the following reasons:</p> <ol style="list-style-type: none"> 1. In 2007, on the recommendation of the Planning Inspector appointed by Welsh Government, Ms Susan Holland, the allocation H1/36 Ynysymond, Alltwen (now H1/25) was removed from the NPT Unitary Development Plan (UDP) because of significant biodiversity issues. Its inclusion in the LDP without modification is therefore inappropriate. 2. In 2007 the Planning Inspector recommended that the land be managed by NPT as a UK biodiversity priority habitat because of the presence of the Double Line Moth. To my knowledge this was not done. Although this moth is no longer a Biodiversity Action Plan (BAP) species, it is protected by the NPT Biodiversity Action Plan 2008-2012 (DL02PS - Protect Double Line Moth from harm or loss from sites). This plan is still current as stated on the NPT website today. "The local biodiversity action plan is being reviewed but for the moment the 2008-2012 version is still being applied." Use of the land for building would clearly be precluded and would be subject to legal challenge. 3. The Purple Moor Grass/Rush (Rhos) Pasture is also protected by NPT BAP (PMGRP01ME-Maintain current extent of Purple Moor Grass and Rush Pastures in Neath Port Talbot). Any building that included loss and/or damage through drainage of this habitat would also be precluded and subject to legal challenge. 4. Changes have been made to the LDP that significantly affect the number of houses planned for this allocation. In the Planning Inspector's report, the NPT Highways representative reported that based on UK Government Policy on Access, the current access arrangements to the site would support only 25 dwellings. Despite there being no apparent change to UK Government Policy, the number of buildings planned has risen from 25 to 50. 5. Other suitable prospective sites for building were identified by both the UDP and LDP. No specific reasons for the inclusion of H1/25 in the NPT LDP are cited that provide satisfactory explanation for the overturning of the Inspector's recommendations. It appears that NPT has therefore wasted a great deal of taxpayers' money by writing and issuing policies that can be disregarded when it no longer suits the Council, along with the Recommendations of the Inquiry in 2005/6. 	H1/25 Ynysymond Road, Alltwen
Dep494	Christine Lloyd		786261	Object	<p>I ask that the site be removed from the plan for the following reasons:-</p> <ol style="list-style-type: none"> 1. Drainage/Sewerage capacity <p>The area proposed for possible development is serviced by an already overburdened sewerage system made up of a cast foul main which emerges from the ground to the rear of 1 Ynysymond road and is supported by brick pillars either side with the pipe forming a 2.5m high bridge across Nant -Y- Llechau. The pipe continues to be intermittently supported by brick pillars along its length of approximately 25m forming the west boundary of my property, 93, Gwyn street, gradually diminishing in height to about 1m. Over recent years a number of joints in the pipe have leaked due to its internal pressure. On one occasion the pressure was such that the pipe was ruptured resulting in a 50mm hole erupting sewage 8-10m into the air polluting the surrounding trees and gardens but, more importantly, the stream (Nant Y Llechau) which flows into the river Tawe.</p> <p>Currently, immediately outside the entrance to my property, a team of contractors on behalf of Welsh Water are carrying out excavation work in an attempt to divert pressure within this sewerage system as it "backs up". Clearly, this foul drainage system does not have capacity to accommodate the degree of further development proposed.</p> <ol style="list-style-type: none"> 2. Access <p>In the 2007 enquiry the inspector noted that the width of access restricted any development to 25 dwellings. The suggestion of 50 houses clearly contradicts that ruling. The constraints on pedestrian and vehicle access into/out of the proposed development area still exist and I question whether the required criteria set out by the 'Planning Policy Wales Technical Advice Notes 2007' for visibility splay could be met. I am also concerned about the location of any possible alternative access routes. In addition, the increased volume of traffic would have a significant environmental impact.</p>	H1/25 Ynysymond Road, Alltwen

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					<p>3. Biodiversity</p> <p>In the 2007 enquiry for the formulation of the NPTCBC UDP the inspector removed the site from the plan because of 'significant biodiversity issues' involving species protected in the current NPTCBC Biodiversity Action Plan. The protection of the significant biodiversity issues identified should be upheld. I understand an Oak tree subject to a Tree Preservation Order is located on the site and I fear that any construction work within its vicinity could have a detrimental effect on the root system.</p> <p>4. Visual amenity</p> <p>Development of the site would have an adverse effect on the visual amenity afforded to neighbouring dwellings.</p> <p>5. Peripheral resources</p> <p>An increase in population by such a proportion would considerably increase demand on health care and educational resources in the area. Are there sufficient resources available?</p>	
Dep511	Mr Kelvin Palmer		786391	Object	<p>We are concerned that the proposed site of 50 houses in Ynysymond Road Alltwn will extend to cover a green area with much Eco potential. The site has already been discounted by a Planning Inspector as it is home to a rare Double Moth and some Purple Moor Grasses Mentioned in the NPT Biodiversity Action Plan where habitats of rare species are supposed to be protected!</p> <p>We also feel that the presence of 50 more houses and their occupants will put extra pressure on already overloaded local services in particular the local school, which is almost at capacity and the Primary Care Centre where presently all Drs lists are full.</p> <p>This is all without considering the access problems onto Ynysymond Road, which already takes heavy traffic as people try to avoid congestion on the Swansea Valley Bypass. The present access would also have to be considerably widened which in itself would cause major problems!</p> <p>Therefore we feel that the development of the 50 houses would in fact cause more problems i.e. spending on basic local services, than it would be beneficial to the area.</p>	H1/25 Ynysymond Road, Alltwn
Dep520	Mr Paul Burrows		786399	Object	<p>I wish to object to the inclusion of the proposed housing site H1/25 Ynysymond Road, Alltwn in the Council's LDP for several reasons.</p> <p>Firstly I understand that in 2007, on the advice of the Welsh Government's Planning Inspector, this site was removed from NPT's UDP due to significant biodiversity issues with a recommendation that the land be managed by NPT as a UK biodiversity site due to the presence of the Double Line Moth. This species is still protected by NPT's Biodiversity Action Plan 2008-2012, which whilst under review is still a current action plan. Use of the land for building purposes would contradict the plan and poses questions about the Council's openness and transparency about any proposed changes to the plan. This would be open to legal challenge.</p> <p>Along similar lines to my point above, the Purple Moor Grass Rush (Rhos) Pasture is also protected by NPT's BAP and any Housing development that leads to loss or damage to this habitat would be precluded and again subject to legal challenge. Should the Council change it's BAP after proposing protected sites in the LDP, this should be questioned at the highest possible level.</p> <p>I also understand that the original proposals were for 25 houses on this site, so how can a proposal for 25 houses be refused, yet this has developed into a plan for 50 houses?? As well as the proposed access way into the new estate not meeting the UK Government Policy on Access to accommodate 50 houses, the increase in traffic in the area, particularly using the narrow country road to Glais is totally unreasonable and can only lead to what was a quiet road, becoming a dangerous route unable to cope with potentially an additional 100+ vehicles.</p> <p>From a personal point of view, we moved to Ynysymond Road almost 2 years ago. What appealed to us was the quiet nature and location of our home, with wonderful views across the Swansea Valley at the rear of the property. We have spent a considerable</p>	H1/25 Ynysymond Road, Alltwn

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					<p>amount of money in enhancing the rear of our property and garden area to enjoy, the peace, privacy and tranquillity of the natural environment that the land behind offers. To even contemplate looking down on roads, houses, other people's gardens etc. is heartbreaking. The increased pollution, noise, traffic and the loss of privacy does not appear to be something that the Council's proposals take into account, but for the residents of Ynysymond Road who are affected by this proposal, this is extremely upsetting and should not be allowed to happen!!!</p> <p>There appears to be no explanation in the plan that explains how the Inspector's previous recommendations have been overturned and on this basis it is my view that the Council's proposals to include this site is unsound.</p>	
Dep911	Miss Bethan Jenkins AM		473974	Object	<p>Residents have raised concerns that the village is in danger of becoming congested with traffic and that pupils walking to the local primary school may face safety risks. A resident has said that all traffic will have to enter and leave along Lon Hir which leads out directly on to Alltwen Primary School, and the safety of the children walking to school will be put at risk.</p> <p>There is also concern that the school could become oversubscribed. A recent Estyn inspection showed that the school is underachieving, and added pressure could drive down the standards.</p> <p>The plan for further housing on Ynysymond Road would also add more congestion and vehicles, and the development is on a site with significant biodiversity issues, and the access route to this site is also inadequate.</p> <p>The Local Development Plan does not recognise the site that has been the subject of planning enquiry and possibly an application. If this were taken into account the bottom of Lon Hir would see in excess of 150 new houses, this is without taking into account the already in place Redrow phase one site of 57 houses.</p> <p>Should these areas be approved for development, there is concern that Alltwen will be moving away from its village status due to being hugely overpopulated.</p>	H1/25 Ynysymond Road, Alltwen
Dep861	Mr Huw Thomas		782389	Object	<p>Inadequate allocations in Pontardawe which has been identified as a Strategic Growth Area (Para. 2.3.12) and a key settlement in delivering sustainable growth - a number of the sites identified do not at present have planning permission.</p>	H1/25 Ynysymond Road, Alltwen
Dep890	Mr Geraint Price		786141	Object	<p>I would like to object to the inclusion of this allocation (H1/25) Ynysymond Road in the Local Development Plan (LDP) for the following reasons:</p> <p>1.The Alltwen and Pontardawe area has a significant number of first language Welsh speakers. If the H1/25 aspect of the LDP were to go ahead, this would only serve to further erode and dilute the quantity and quality of Welsh in the area. The likely increase in the number of non-Welsh speaking households will have a devastating effect on the linguistic balance in the area. The SA shows that whilst there are a small number of Welsh school places untaken, the influx of non-Welsh speakers who will take up these spaces will only have a negative impact on the Welsh speaking students.</p> <p>2.In 2007, the Planning Inspector appointed by Welsh Government, Ms Susan Holland, recommended that the then proposed allocation H1/36 Ynysymond, Alltwen (now H1/25) be removed from the NPT Unitary Development Plan (UDP) because of significant biodiversity issues. I believe these issues are relevant and are <u>still current</u> .</p> <p>The fields on both sides of Ynysymond road are examples of moor grass pasture which is protected by the NPT biodiversity action program. This marshy grassland occurs on poorly drained lowland areas with high rainfall and wet soils and is a reducing habitat identified as being in need of protection. Today, only a few sites such as those around Ynysymond road are kept as rough grazing for cattle and horses. It is known as being particularly important for its populations of Double Line Moths (formerly UK BAP priority species) and whilst the Double Line no longer appears on the BAP priority list, it is of vital importance that we preserve and protect these areas of biodiversity.</p> <p>An environmental impact study was submitted to accompany site P46 located to the south east of Ynysymond road (just across the road from H1/25), when the candidate sites were first being proposed, which identified devils bit scabious, well known as being</p>	H1/25 Ynysymond Road, Alltwen

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>favoured as the main larval food plant by the marsh fritillary. In fact this plant is often used to monitor the potential wellbeing of the species and is evidence of the rich biodiversity identified by NPT in the past as being present in these fields surrounding the community of Alltwen. The EIA was withdrawn by the proposer of P46 but it should have been recorded by the planning authority as having been lodged at one time.</p> <p>3. Quite simply, the roads infrastructure in the area is not able to cope with additional housing on the scale proposed. Changes have been made to the LDP that significantly affect the number of houses planned. In the Planning Inspector's report The NPT Highways representative reported that based on UK Government Policy on Access, the current access arrangements to the site would support only 25 dwellings. Despite there being no apparent change to UK Government Policy, the number of buildings planned has risen from 25 to 50, yet there have been no changes to the local road network. Already we see <u>regular</u> tailbacks from the intersection of the M4(J45) and the A4067 which extend back to the Glais roundabout, often backing up as far as Tesco Pontardawe. Are we really proposing to add to this problem? Even the VHP gas pipeline contractor elected to establish a temporary site traffic entrance off the A4067 in recognition of the serious consequences additional traffic would have on the village of Alltwen.</p> <p>It is for these reasons that I call upon NPT Council to reject site H1/25 and remove it from the LDP without delay, as to proceed with this development would be to the detriment of the residents of Alltwen and indeed the greater Pontardawe area.</p>	
Dep849	Mr Graham Williams		786199	Object	<p>I wish to record my objection to the proposed Housing development at this site. My grounds are as follows:</p> <p>1 In 2007, the Inspector ruled that the site should be removed from the proposed plan because there were "significant biodiversity issues". These related to the existence of protected moths and Purple Moor Grass. These are recognised as being protected in the Authority's Biodiversity Action Plan for 2008 to 2012. In the absence of an updated Plan, the earlier version still applies and the biodiversity issues set out there remain relevant and represents the Authority's current Policy. It is surprising in the extreme, and totally improper, for officers to have advised Councillors to contravene the Policy framework within which they are required to operate. Officer advice would, if acted upon, also be in contravention of Welsh Government Biodiversity policy.</p> <p>2 The width of the access left by the previous developer, which would open onto Ynys y Mond Rd, is too narrow for the Authority to allow the construction of more than 25 houses in any case. In this respect also, officer advice that the site is suitable for 50 houses is incorrect as it ignores this fundamental limiting factor.</p> <p>3 Analysis of the implications of building more houses on this site for essential services in the area - access to schools, Health Services and other amenities necessary for people to enjoy a suitable quality of life - is entirely absent. A decision to proceed with the site's inclusion without the comprehensive analysis which these considerations require would be little short of irresponsible.</p> <p>4 That irresponsibility is compounded by the lack of proper consideration of the increased traffic flows resulting from the provision of further housing on this site. Any analysis of traffic flows would show that for 2 hours in both the morning and evening, there is heavy traffic through the village and down Ynys y Mond Rd to Glais. Much of this takes the route through Alltwen to avoid using the main Swansea Valley road which regularly experiences nose to tail traffic between the bottom of Alltwen Hill and through the 4 Roundabouts between there and the M4 Motorway. Your Authority's proposal for Ynys y Mond Rd, and indeed for Bryn Morgrug, would make a bad situation very much worse. There does not seem to have been a census of traffic flows through the village nor indeed any projection of the extra number of cars resulting from any housing development. Additionally, is it correct that the census of traffic flow on the Valley road, which was conducted ahead of arrangements for transporting Windmills through Pontardawe, was conducted, as the census staff suggested, only on the weekend and not during the busy working week? If so, how can the Authority project the implications for Ynys y Mond Rd of other housing developments adding to the Valley road's weekday congestion with any confidence</p> <p>5 The danger inherent in increasing traffic volume through the village, negotiating parked cars and pedestrians including school children, clearly requires consideration prior to any decision about the inclusion of this site for the purpose of building houses. Added to this must be the risks associated with increasing traffic volume along the generally unsuitable country lane to Glais which has 4 single track stretches along its length and already experiences a significant number of vehicles many of which travel at excessive speeds. The fact that officers have not explained their thinking on this issue is completely unacceptable.</p>	H1/25 Ynysymond Road, Alltwen

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					The Authority has invited comments on the consultation process. It is generally poor focusing more on the volume rather than on the quality of information provided. What people need is ease of access to information which will assist them in understanding the detailed considerations that led to the inclusion of potential sites for housing development. In reality, any information on this is both hard to find and immensely superficial once discovered. Overall, it has been a disappointing experience.	
Dep900	Christine Lloyd		786261	Object	<p>As a resident of Gwyn Street, Alltwen, I write to outline my concerns regarding the possible future development of land situated between Ynysymond Road and Derwen Road referred to as H1/25 in the authority's Local Development Plan. I ask that the site be removed from the plan for the following reasons:</p> <p>[1] Drainage / Sewerage Capacity</p> <p>The area proposed for possible development is serviced by an already overburdened sewerage system made up of a cast foul main which emerges from the ground to the rear of 1 Ynysymond Road and is supported by brick pillars either side with the pipe forming a 2.5m high bridge across Nant Y Llechau. The pipe continues to be intermittently supported by brick pillars along its length of approximately 25m forming the west boundary of property 93 Gwyn Street, gradually diminishing in height to about 1m. Over recent years a number of joints in the pipe have leaked due to its internal pressure. On one occasion the pressure was such that the pipe was ruptured resulting in a 50mm hole erupting sewage 8-10m into the air polluting the surrounding trees and gardens but, more importantly, the stream (Nant Y Llechau) which flows into the river Tawe.</p> <p>Currently, immediately outside the entrance to my property, a team of contractors on behalf of Welsh Water, are carrying out excavation work in an attempt to divert pressure within this sewerage system as it "backs up". Clearly, this foul drainage system does not have capacity to accommodate the degree of further development proposed.</p> <p>[2] Access</p> <p>In the 2007 Inquiry, the Inspector noted that the width of access restricted any development to 25 dwellings. The suggestion of 50 houses clearly contradicts that ruling. The constraints on pedestrian and vehicle access into/out of the proposed development area still exist and I question whether the required criteria set out by the 'Planning Policy Wales Technical Advice Notes 2007' for visibility splay could be met. I am also concerned about the location of any possible alternative access routes. In addition, the increased volume of traffic would have a significant environmental impact.</p> <p>[3] Biodiversity</p> <p>In the 2007 Inquiry for the formulation of the NPTCBC UDP, the Inspector removed the site from the plan because of 'significant biodiversity issues' involving Double Line Moths and the existence of Purple Moor Grass, both of which are protected in the current NPTCBC Biodiversity Action Plan. The protection of the significant biodiversity issues identified should be upheld. I understand an Oak tree subject to a Tree Preservation Order is located on the site and I fear that any construction work within its vicinity could have a detrimental effect on the root system.</p> <p>[4] Visual Amenity</p> <p>Development of the site would have an adverse effect on the visual amenity afforded to neighbouring dwellings.</p> <p>[5] Peripheral Resources</p> <p>An increase in population by such a proportion would considerably increase demand on health care and educational resources in the area. Are there sufficient resources available?</p>	H1/25 Ynysymond Road, Alltwen
Dep874	Laura Tams		786576	Object	I wish to object to the potential housing developments highlighted in the LDP in relation to Bryn Morgrug phase 1 & 2 and also Ynysymond Road, Alltwen.	H1/25 Ynysymond

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					<p>Item H1/25 Ynysymond Road. This site covers a huge site to only house 50 homes. Two main observations here are that the width of the access left by the previous developer restricted the development at the time to 25...this has not changed yet the numbers within the LDP have??</p> <p>There are significant biodiversity issues linked to this site , in regard to moths and grass type. The Inspector in 2007 added this site to the NPT Biodiversity Action Plan 2008-2012, this plan is still current and can be viewed online.</p> <p>Should these areas be approved for development Alltwen will be moving away from its village status due to being hugely overpopulated. Schools and other public facilities within the area will be flooded - a recent ESTYN inspection showed that the school is not performing well, we do not need added pressure on the School with potentially 200+ children that would need school places from some 160 suggested homes.</p>	Road, Alltwen
Dep877	A.K. Taylor		786579	Object	<p>I am writing to object to the LDP that has proposed an extra 200 houses in the village of Alltwen. There is already an insufficient road structure throughout the village of Alltwen, leading to the town of Pontardawe and cannot believe there is no road improvement plan to support the proposed housing plans. Ynysymond is surrounded by narrow, winding country roads which locals are already wary of using because of the miss-use of other drivers driving dangerously. However I am even more concerned with the proposed plan of adding another 51 houses (Phase 2) to the end of the Lon Hir, Brynmorgrug and Edward Street where 56 houses have already been built (Phase 1). There is only one entrance and exit along Lon Hir for the 200 plus houses already built and yet there is a proposal for another 51 houses in place with no plans to introduce a second entrance and exit. When the Phase 1 planning was granted in the 70's there were 2 entrances and exits to this cu-de-sac with a 3rd proposed and leading onto Graig Road. My concerns are increased because I know that Redrow have bought the Aladdin Industrial Estate and believe there will be another 100 houses proposed to be built on this land. The road along Lon Hir is not a main road and was not built to support this much traffic. Most residents park off the road on their drives and are already struggling to leave and join the road because of the increase of traffic and the speed cars travel down Lon Hir despite the road bumps. Dangerously (due to there being only one road leading to this cul-de-sac) any emergency needing the road to be shut, would cut off all residents resulting in no one being able to enter or leave the cul-de-sac. My other concern is the traffic on the roundabout outside the school, and the other roundabouts leading to the town centre and towards Tesco. There is already a heavy build up of traffic and at times vehicle queues are backing up from one roundabout to another. Can Pontardawe, a town with the 2nd highest vehicle collision rate (Road Safety data), cope with more traffic? As well as the insufficient road structures, Alltwen Primary School already has a very high pupil intake and Estyn has requested that the school must not be put under anymore pressure so where would the children from these new estates go to school?</p> <p>Overall I cannot see how the proposed LDP for the village of Alltwen can be seriously taken into account as I have only touched on the objections I and others have. I have not mentioned the poor sewerage systems that Alltwen has and the increase other local services will endure such as the Health Service, Fire Service to name a few.</p>	H1/25 Ynysymond Road, Alltwen
Dep894	Mrs Nicola O'Sullivan		786580	Object	<p>I wish to raise my objections regarding the LDP and its proposals regarding Alltwen.</p> <p>My objections to H1/25 Ynysymond Road are as follows:</p> <p>Proposals to develop this area have been previously not taken forward because of the following:</p> <ul style="list-style-type: none"> • Biodiversity within the area. • Inadequate road structure. • Lack of sewerage infrastructure. <p>These issues have not been addressed and still exist and I struggle to see how these have been resolved to take this proposal further.</p> <p>These proposals together would have a significant and detrimental effect on the village of Alltwen, it will detrimentally affect the character of the village.</p>	H1/25 Ynysymond Road, Alltwen

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					I question whether the impact of development of this scale and magnitude had considered the impact on local infrastructure as well as the capacity of local schools and healthcare providers to accommodate growth of this scale.	
Dep871	Elizabeth Jones		786632	Object	<p>The deposit plan identifies Pontardawe as a language sensitive area, and key issue 18 states that "the erosion of the Welsh language is a concern in many of the valley communities". Pontardawe has also been identified as a strategic growth area, and therefore has considerable housing allocations, and is classified as a town in table 3.1 in the deposit plan. Alltwen is classified as a 'small local centre' in the same table. Over 25% of the housing allocation for Pontardawe is sited in Alltwen.</p> <p>The Sustainability Appraisal notes that the Menter Iaith Castell Nedd Port Talbot study of the new housing development in Godre'r-Graig and supplementary study in Ystradgynlais concluded that large scale housing development in the Swansea valley will tend to contain a lower percentage of Welsh speakers [when compared with the area of existing housing] and as such will have an impact on the fabric of the community. The Sustainability Appraisal also finds that the allocations in Pontardawe are likely to have a negative impact on the linguistic balance of the area. Neath Port Talbot Council's Neighbourhood Profile for Alltwen Ward (using data from the 2001 UK census) states that there are 916 households in Alltwen. The allocation set out in the deposit plan will increase the households in Alltwen by 17%. This is a considerable increase. There is therefore an inconsistency between the Sustainability Appraisal and the allocations in the deposit plan, and despite evidence demonstrating that new developments have an impact on the fabric of the community, and a negative impact on the linguistic balance of the community, Alltwen, part of that area identified as a language sensitive area, has a considerable housing allocation. The measures proposed to address the negative impact on the Welsh language cannot be trusted with any measure of guarantee to have any positive influence whatsoever. The deposit plan notes that Neath Port Talbot's Single Integrated Plan vision is to "create a Neath Port Talbot where everyone has an equal opportunity to be healthier, happier, safer and prosperous". In the community of Alltwen, where the proposed development is likely to have a negative impact on the fabric of the community, there would seem to be very little opportunity to be happier, and to ensure the plan is made sound these three allocations in Alltwen need to be removed.</p> <p>The impact on local schools has, in my view, not been taken into account. A recent Estyn report on Alltwen showed that the school was underachieving: with a large influx of children from the additional houses resulting from this plan will put additional pressure on the school.</p> <p>In addition the transport section does not reflect the issues accompanying the allocations. There already exist problems in the Lon Hir/Edward Street/Brynmorgrug area of Alltwen, where, due to council changes to the road system in the past, there now exists a large cul de sac with congested entrance/exit. With the additional cars using these roads as a result of H1/LB/30 and the proposed H1/24 (and possibly even more houses in the future) - an additional 108 houses at minimum - this situation will get worse. Should there be an accident or incident leading to the entrance to Lon Hir being blocked there would be no road access to the area for either residents or emergency vehicles. A new, separate, access to either Graig Road (A474) or the A4067 should be required as part of any new development here.</p>	H1/25 Ynysymond Road, Alltwen
Dep897	Mr & Mrs P Griffiths		786662	Object	<p>As a resident of Gwyn Street, Alltwen, I write to outline my concerns regarding the possible future development of land situated between Ynysymond Road and Derwen Road referred to as H1/25 in the authority's Local Development Plan. I ask that the site be removed from the plan for the following reasons:</p> <p>[1] Drainage / Sewerage Capacity</p> <p>The area proposed for possible development is serviced by an already overburdened sewerage system made up of a cast foul main which emerges from the ground to the rear of 1 Ynysymond Road and is supported by brick pillars either side with the pipe forming a 2.5m high bridge across Nant Y Llechau. The pipe continues to be intermittently supported by brick pillars along its length of approximately 25m forming the west boundary of property 93 Gwyn Street, gradually diminishing in height to about 1m. Over recent years a number of joints in the pipe have leaked due to its internal pressure. On one occasion the pressure was such that the pipe was ruptured resulting in a 50mm hole erupting sewage 8-10m into the air polluting the surrounding trees and gardens but, more importantly, the stream (Nant Y Llechau) which flows into the river Tawe.</p> <p>Currently, immediately outside the entrance to my property, a team of contractors on behalf of Welsh Water, are carrying out</p>	H1/25 Ynysymond Road, Alltwen

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					<p>excavation work in an attempt to divert pressure within this sewerage system as it "backs up". Clearly, this foul drainage system does not have capacity to accommodate the degree of further development proposed.</p> <p>[2] Access</p> <p>In the 2007 Inquiry, the Inspector noted that the width of access restricted any development to 25 dwellings. The suggestion of 50 houses clearly contradicts that ruling. The constraints on pedestrian and vehicle access into/out of the proposed development area still exist and I question whether the required criteria set out by the 'Planning Policy Wales Technical Advice Notes 2007' for visibility splay could be met. I am also concerned about the location of any possible alternative access routes. In addition, the increased volume of traffic would have a significant environmental impact.</p> <p>[3] Biodiversity</p> <p>In the 2007 Inquiry for the formulation of the NPTCBC UDP, the Inspector removed the site from the plan because of 'significant biodiversity issues' involving Double Line Moths and the existence of Purple Moor Grass, both of which are protected in the current NPTCBC Biodiversity Action Plan. The protection of the significant biodiversity issues identified should be upheld. I understand an Oak tree subject to a Tree Preservation Order is located on the site and I fear that any construction work within its vicinity could have a detrimental effect on the root system.</p> <p>[4] Visual Amenity</p> <p>Development of the site would have an adverse effect on the visual amenity afforded to neighbouring dwellings.</p> <p>[5] Peripheral Resources</p> <p>An increase in population by such a proportion would considerably increase demand on health care and educational resources in the area. Are there sufficient resources available?</p>	
Dep899	Mrs E L Thomas		786663	Object	<p>As a resident of Gwyn Street, Alltwen, I write to outline my concerns regarding the possible future development of land situated between Ynysymond Road and Derwen Road referred to as H1/25 in the authority's Local Development Plan. I ask that the site be removed from the plan for the following reasons:</p> <p>[1] Drainage / Sewerage Capacity</p> <p>The area proposed for possible development is serviced by an already overburdened sewerage system made up of a cast foul main which emerges from the ground to the rear of 1 Ynysymond Road and is supported by brick pillars either side with the pipe forming a 2.5m high bridge across Nant Y Llechau. The pipe continues to be intermittently supported by brick pillars along its length of approximately 25m forming the west boundary of property 93 Gwyn Street, gradually diminishing in height to about 1m. Over recent years a number of joints in the pipe have leaked due to its internal pressure. On one occasion the pressure was such that the pipe was ruptured resulting in a 50mm hole erupting sewage 8-10m into the air polluting the surrounding trees and gardens but, more importantly, the stream (Nant Y Llechau) which flows into the river Tawe.</p> <p>Currently, immediately outside the entrance to my property, a team of contractors on behalf of Welsh Water, are carrying out excavation work in an attempt to divert pressure within this sewerage system as it "backs up". Clearly, this foul drainage system does not have capacity to accommodate the degree of further development proposed.</p> <p>[2] Access</p> <p>In the 2007 Inquiry, the Inspector noted that the width of access restricted any development to 25 dwellings. The suggestion of 50 houses clearly contradicts that ruling. The constraints on pedestrian and vehicle access into/out of the proposed development area still exist and I question whether the required criteria set out by the 'Planning Policy Wales Technical Advice Notes 2007' for</p>	H1/25 Ynysymond Road, Alltwen

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Dep1370	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p>	H1/25 Ynysymond Road, Alltwen

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					<p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep862	Mr Huw Thomas		782389	Object	Inadequate allocations in Pontardawe which has been identified as a Strategic Growth Area (Para. 2.3.12) and a key settlement in delivering sustainable growth - a number of the sites identified do not at present have planning permission.	H1/26 Cwmtawe School, Pontardawe (Phase 2)
Dep863	Mr Huw Thomas		782389	Object	Inadequate allocations in Pontardawe which has been identified as a Strategic Growth Area (Para. 2.3.12) and a key settlement in delivering sustainable growth - a number of the sites identified do not at present have planning permission.	H1/27 Waun Sterw / Waun Penlan, Rhydyfro
Dep1372	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p>	H1/27 Waun Sterw / Waun Penlan, Rhydyfro

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					<p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep264	Mrs Myfanwy Powell		343176	Object	<p>I previously forwarded my opinions on the LDP last year, that time by old fashioned post. My opinions were shared by many people. My main concern was the village of Rhos, Pontardawe, and the projected plan of building 150 houses on prime agricultural land. A fact more galling because the first draft of the LDP ruled out Rhos for any land to be used for building. Needless to say despite several objections the Council have carried on in their own sweet way.</p> <p>Using the modern way of communicating this time, my objections remain the same. so I will not waste your time or mine by repeating them. All I need to say that last week I passed the proposed sight on Benbrych Farm the proposed site for 150 houses. It was a lovely day the sun shining, the fields targeted were full of rich green grass, with a herd of beautiful cattle and a magnificent bull. In fact a picture of ideal prime agricultural land. I actually was tempted to take some pictures to show my grandchildren so they could see what would be destroyed by a short-sighted unimaginative council if they go on to designate this land to be covered with concrete.</p> <p>The latest projection by scientist on Global Warming does not make easy reading, and some predict an affect on food production and loss of land. Surely it is only common sense and a bit of forward looking to maintain all the productive land we have even if its only a small part of a small village called Rhos.</p> <p>That image of Benbrych land in the sun will stay with me for a very long time. Surely there are plenty of so called brown field sites to accommodate the ever increasing need for houses.</p>	H1/28 Bryn Brych Farm, Rhos
Dep342	Mr. Huw George		693449	Object	<p>Development of this parcel of land would seriously impinge on the green wedge between the communities of Rhos, Gellinudd and Alltwen. It would destroy a natural environmental corridor and habitats of Tawny Owls and crows. There are groups of mature trees which would also suffer. Vehicular access is very poor. Access down Plas Road is already congested by other developments in the area and residents have limited off street parking causing congestion. If access were given off the A474 this would also be difficult due to the twisting nature of the road. There are limited options for access on to the A474 and these would be close to the school causing problems for children and their parents.</p>	H1/28 Bryn Brych Farm, Rhos
Dep343	Mrs Mary George		784947	Object	<p>I would like to object to the proposed inclusion the site H1/28 Bryn Brych Farm, Rhos in the Local Development Plan.</p> <p>Developing this land would damage the habitats of Crows, Tawny Owls and Toads. Groups of mature trees would be lost along with the habitats they provide for wildlife. The development would impinge on the green wedge between the distinct communities of</p>	H1/28 Bryn Brych Farm, Rhos

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					Rhos, Gellinudd and Alltwen. Access to and from the site would be difficult. Plas Road is already congested with limited off street parking for residents and increased traffic levels from the development of Cae Rhedyn. Access on to the A474 is dangerous due to the bends in the road, close proximity of the junction of Heol y Nant and Alltwen Corner. The location of the school will cause additional dangers for pupils and their parents. I propose that this parcel of land is excluded from the final LDP.	
Dep489	Mrs Samantha Harris		785545	Object	<p>I wish to object to the inclusion of the H1/28 Bryn Brych Farm site in the proposed allocations for future development for the following reasons:-</p> <ol style="list-style-type: none"> The proposals contravene Policy EN3 Green Wedges which refers to the prevention of coalescence of settlements and the protection of the setting of urban areas. The green wedge is incorrectly digitised and should cover the Bryn Brych Farm site. The postal address of properties on Neath Road, which commences at the junction of the primary school, is Rhos. On the opposite side of the junction, New Road commences and each property here has a postal address of Gellinudd. The Bryn Brych Farm site currently straddles this convergence and currently separates the villages/settlements of Rhos and Gellinudd. Therefore, the site should not be developed. The LDP's Strategic Housing Site Assessment Report (August 2013), section 4.4.1.6 states 'the green wedge is designated to prevent the coalescence of Rhos with Gellinudd' - if this is to be the case, the Bryn Brych Farm site should be the designated green wedge to prevent the coalescence of New Road, Gellinudd and Neath Road, Rhos. As a result of this, paragraph 4.4.1.8 is also incorrect as this coalescence will occur if the Bryn Brych Farm site is developed. The proposals also contravene point 1 of Policy TR2 which refers to the design and access of new development. The proposed access points to the site, opposite the primary school and via Maes Lan, will create unacceptable levels of traffic generation for the existing residents of the village. There have been a number of accidents along this stretch of the A474 and a number of years ago there was a fatal accident where an elderly lady was hit by a speeding motorcycle (this fatality has not been mentioned in the May 2013 Transport Assessment). Also, due to the fact that a Transport Assessment has been provided for the proposed Bryn Brych Farm site this is admittance in itself, according to point 4 of Policy TR2, that this proposed site is likely to create significant traffic generation. The proposals are contrary to Policy BE1 referring to design in that the development, in terms of its scale and density/massing, due to the planned number of dwellings on the given area of land, will not be in keeping with the character of the area. The development will dominate the prominent skylines/ridge above the Rhos Bends peat bog as is clearly visible from the A474, travelling southbound from Pontardawe to Neath by car or on foot. The development would have a negative impact on highway safety and would certainly have a significant, adverse impact on the amenity of occupiers of adjacent land and the local community. Due to the proposed number of dwellings and the likely design to accommodate such numbers on a 6 hectare site, it is likely that any green space, green infrastructure, biodiversity and ecological connectivity able to be retained will be of far less value than that already in existence. The location, of the development, in itself, on a series of bends and accessed via both a small residential road and opposite a primary school will not be in the interests of safety for pedestrians, cyclists or vehicle users. Point 8 of this policy immediately raises concerns about the number of dwellings which will be 'crammed' onto the site to 'make the best and most efficient use of the land available'. The definition of efficiency being achieving maximum productivity with minimum wasted effort or expense or preventing the wasteful use of a particular resource. 'Appropriate densities taking account the character and appearance of the area' appear to be far greater in new developments compared to neighbouring older developments as developments such as Alltwen Gardens compared with Brynmorgrug demonstrate, for example. When considering 'barrier-free environments, allowing access by all and making full provision for people with disabilities, its important to note that there is no existing pavement between number 6, New Road, Gellinudd and the junction of Plas Road, Rhos. This appears to be unachievable without the compulsory purchase of private land. <p>It would be of interest to have further information on how 4.4.1.17 will be achieved. The NRW has indicated that there are land drains on site which should be protected from development by means of a 3 metre development-free buffer which should be incorporated into the design and layout of the scheme. From basic calculations, 150 dwellings on a site of 6 hectares results in 25 dwellings per hectare and each dwelling having a plot approximately 40 x 10 metres or 20 x 20 metres, for example. As this calculation does not take into account any roads, pavements, remaining trees and/or hedges or the development-free buffers</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>specified, how is it anticipated that this will be achieved without 'cramming' dwellings onto the site or allowing townhouses to be built? Either of these options by reason of their design, size and bulk, together with their prominent position adjacent to the Pontardawe to Neath A474 (part of NPT's core highway network), will be detrimental to the visual amenity of the dwellings themselves and the wider street scene. It can be assumed that in order to achieve these housing numbers on such a site that there will be impacts upon the amenity of residents within neighbouring properties, impacts upon the character and appearance of the surrounding area and impacts upon the highway safety of the existing road network.</p> <p>Also, on page 113 of the LDP Strategic Housing Site Assessment Report (August 2013), there is a response to the third comment in Table 4.75 which states 'the site is not considered to be visually prominent'. However, due to the site's topography, it is elevated from the Rhos Bends Peat Bog and from the A474. The site may not be visually prominent as green agricultural land but its prominence would soon be recognised if 150 dwellings were to dominate the view from the A474.</p> <p>Another response to a comment relating to a lack of parking and traffic congestion at school times, causing highway and pedestrian hazards, was responded to by saying that 'many schools have no or limited parking'. Whilst this is true, it has also been recognised by the respondent that such parking is a hazard to road users and pedestrians and that the regulating Authority should ensure free flow of traffic and pedestrian safety. If such matters cannot be addressed with existing volumes of traffic at Rhos Primary School, then the proposed development can only exacerbate the current problem.</p> <p>Concerns relating to increased car usage have been responded to suggesting that residents will use alternative modes of transport and that the range of facilities within Rhos can meet residents' daily needs. It is highly unlikely that car usage will not increase and the number of cars in the area will certainly increase.</p> <p>With regards to the provision of adequate healthcare, Pontardawe Primary Care Centre currently closes for 2 hours per week to address administration issues which cannot be dealt with during surgery opening hours due to the current volume of patients. Also, an employee of the NHS has noticed that numbers of patients failing to be able to make appointments with a GP in Pontardawe, due to patient numbers, are using Morriston Hospital's A&E as an alternative. Should an additional 150 houses be added to the Rhos housing stock together with the additional large developments at Brynmorgrug, Parc Gilbertson and Cwmtawe, how is it anticipated that the local Health Centre will cope? Also, with additional patients come additional cars, resulting in further problems. These are largely due to the very poorly designed and dangerously sited entrance to the Health Centre. This lies between two road junctions, serving the Alloy Industrial Estate and Herbert Street, which are within very close proximity. The entrance to the health centre is also opposite a veterinary surgery, next door to the Air Training Corp. facility and next door but one to a busy bus depot.</p> <p>I hope that these factors will be considered in detail. Not only is the Bryn Brych Farm site land allocation contrary to a number of policies within the LDP, it will fail to benefit existing residents in the area. The scale of additional work, which would be required to reduce the impact of the development of such a site to acceptable levels, is unlikely to be viable in such an area.</p>	
Dep486	Mr Antony Moorley		786200	Object	<p>H1/28 should be rejected for the following reasons:-</p> <p>Landscape Impact:</p> <p>Due to the elevated topography of the proposed site and particularly the view of the site driving/walking south along the A474, the development would have an extreme impact on the landscape. From this position, the view of the site is of an elevated ridge, very little landscaping and nothing behind it but sky. Therefore the new skyline would become roof tops, rather than pasture, the impact of which is unacceptable in such a rural location.</p> <p>Coalescence of Rhos and Gellinudd</p> <p>The site adjoins 97 - 109 New Road, Gellinudd. Given that other sites in the Rhos area have been rejected on the basis of their effect on coalescence of Rhos/Gellinudd, this site is no different and should be rejected. The site should be replaced with Green Wedge to preserve the differentiation between both villages.</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>Highways/Traffic</p> <p>The A474 at this point is very dangerous given the speed of traffic. The additional traffic generated by 150 extra houses would increase risk of accidents unacceptably.</p>	
Dep508	Mr Stephen Saunders		786390	Object	<p>I want to express my concern at the number of units involved within the H1/28 Bryn Brych Farm, Rhos site. The traffic assessment undertaken mentioned the A474 new road access, Alltwen hill roundabout and the A4067 Tesco access roundabout as having 'sufficient capacity to accommodate the additional traffic'. I cannot believe with the new access to the site being off the A474, that Rhos primary school, the winding nature of the road and the current nature of the road seems to have been overlooked. With the additional traffic, the bottlenecks already witnessed during peak periods at the Neath road/Plas road junction, the Neath road down towards Neath college and the Tesco access roundabout would need considerable investment to improve. With the increased traffic/assumed commuting, the increased danger to local children and residents, particularly around Rhos school is a real concern. There is also mention of a secondary road through the top of Maeslan onto Plas road, I cannot imagine how this is an option considering the width of the Maeslan access road and the narrowness of Plas road itself. I believe the site planned is too large for the location.</p>	H1/28 Bryn Brych Farm, Rhos
Dep513	Miss Maria Williams		786395	Object	<p>Tens of thousands of our public have already been spent preparing the Pontardawe site.</p> <p>The proposal for 150 houses on Bryn Brych Farm Rhos is completely irresponsible for numerous reasons including;</p> <p>Issues with sewerage</p> <p>Neath road is already busy as are the exit/ entry points into Maeslan. The volume of extra traffic would increase the danger significantly</p> <p>Privacy of existing homes including impact of loss of daylight onto the existing properties.</p> <p>A large number of residents are Welsh speaking, the building of 150 extra homes could dilute the current situation significantly</p> <p>Negative impact/ destruction of the habitats of the wild life that life on the outskirts of the farm/ use the farm land to pass through.</p> <p>Work would have to be done to local schools, to expand their current facilities to accommodate possible influx of the younger generation.</p> <p>Impact on the security of the existing homes, currently the crime rate in Rhos is very low, this is due to the residence that occupy existing dwellings, influx of several families simultaneously could impact negatively on this.</p>	H1/28 Bryn Brych Farm, Rhos
Dep515	Mr Thomas		786398	Object	<p>Regarding the plan for building 150 houses on Bryn Brych Farm in Rhos.</p> <p>I do not believe that the planning of 150 houses on the proposed site is fair to the existing home owners. Properties around the area were bought under the misguidance that it was a green belt. The rurality of Rhos attracted the current owners to their dwellings. I myself moved form Neath to be in this rural environment. I understand that changes are inevitable but there are more suitable sites in Bryncoch and Pontardawe. I do not wish to pay any more council tax than I already pay. There are implications for all the services including water and sewerage. Transport and traffic congestion is already an issue on these smaller roads, and pulling out opposite Rhos shop is already exceptionally difficult and sometimes very dangerous during peak travelling times. Crime rate is currently low and I would like that to remain the case. I believe another 150 houses on the proposed site has implications for the 'rural feel' of Rhos and the close knit community that exists. If the planning has to go ahead, it would make sense to build less houses. Ideally I do not wish to see this planning being accepted. I am worried about the sewerage systems and as I have already stated, transport access, increased volume of traffic onto main road and also coming into Maeslan, the impact on wildlife that currently live in the area.</p>	H1/28 Bryn Brych Farm, Rhos
Dep519	Mrs Williams		786401	Object	<p>I am opposed to the proposed planning of 150 houses in the Rhos ward Bryn Brych Farm on Neath road Rhos. It has serious implications for the village of Rhos. VILLAGE, soon to be a town if it continues to be taken over by the growth of more houses.</p>	H1/28 Bryn Brych Farm,

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					I moved to Rhos years ago because of its rural position, I have seen open areas slowly being taken over by houses. There are plenty of houses already for sale in Rhos for new or first time buyers. I do not understand the need to build any more in the VILLAGE of Rhos (not town). There are a number of reasons I oppose the planned building on Bryn Brych Farm. Higher volumes of traffic on an already very busy and dangerous main road. The exit and entry towards Maes Lan is not large nor robust enough to take the extra traffic. Children live in the area, it would be dangerous to increase the level of traffic further. Their safety is being compromised for money. The existing homes will have their privacy compromised and they will also lose day light if so many house are built to certain heights. People by houses mainly on the basis of their location- it is unfair to have that compromised when existing residence have spent tens of thousands making the houses they bought a home, to have their surrounding butchered is unjust. My family speak Welsh as do many of our friends, I have found that the influx of people over the years is impacting on this as people from parts of England move to 'rural village', new houses could attract more of the same. We need to preserve the Welshness of our Rhos community. More and more people are having to revert to the use of the English language- we need to be actively protecting the use of the language in our community. Our sewerage systems are for a number of houses, I believe that an extra 150 houses will cause a strain on our systems if not real problems that will effect the existing residence- unfair to say the least if existing residence end up having to pay for damages/ improvements. Council tax will not be alleviated by the new homes, the services with have to work harder and be stretched further which has financial implications for the rest of us living in the village. With energy prices constantly on the rise, along with WG cutting money to councils, how can you justify this proposal.	Rhos
Dep608	Patricia Mary Dawes		339784	Object	<p>[1] The proposed development goes against Council policy as it would merge Rhos with Gellinudd.</p> <p>[2] Traffic situation has not been realistically monitored and therefore is not acceptable.</p> <p>[3] The development would ruin the beauty of the view of the lovely valley. we should keep the green fields seen from the main road instead of closing it in with the housing.</p> <p>[4] Access to the site via the top of Maeslan not acceptable and therefore has to be altered.</p> <p>[5] There is a worrying drainage problem in Maeslan now with water standing on the garden surfaces after a downpour of rain and this will only become worse with all that is involved with a building site. There is also the sewerage to be considered. The number of cars in Maeslan and also Plas Road have risen considerably as a number of them are parked on the road and can cause difficulties therefore more traffic will cause more problems.</p>	H1/28 Bryn Brych Farm, Rhos
Dep607	Mr P Chilcott		339799	Object	<ul style="list-style-type: none"> The traffic situation has not been monitored realistically well to the proposed entrance to the site via Maeslan the increase in traffic will be enormous. Approx extra 200-300 cars and other transport. Most concerned about the increase in sewerage up to date we have had many problems over the past few years at Maeslan. (Problems Trebanos area). Over the past few years the water table under Maeslan has been causing extra surface water in gardens after heavy downpour of rain. Concerned by overlooking neighbours. 	H1/28 Bryn Brych Farm, Rhos
Dep605	Ms Emma Davies		473473	Object	<p>Landscape, Environment & Strategy</p> <p>The development would result in the coalescence of two settlements namely Rhos and Gellinudd. As properties on New Road have Gellinudd postal addresses, the site would bridge the gap which currently exists between the two villages. This would contravene NPT Council's policy to respect the distinctiveness... identity and character of communities by ensuring that they remain as separate settlements. As another site close to Bryn Brych Farm was rejected on the grounds that it would reduce the gap between the communities - this site should therefore be rejected as it connects the two villages.</p> <p>Due to the topography of the surrounding area, the proposed development would have a significant impact on the landscape as it would have nothing behind it but sky.</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>As this is a language sensitive location a 10% increase in population would have a detrimental effect on the Welsh language and the measures proposed to negate this impact are not sufficiently robust to counteract the effects of such a large influx of people.</p> <p>The site has two rights of way crossing the land, one officially recognised and another created by the land owner, which has been used to my knowledge for over 30 years, leading from Maeslan to the main road via the farm road. While the Site Assessment Report recognises one of the paths the other needs to be taken into account re: the proposed development.</p> <p>The development would also lead to the loss of farmland, which would go against NPT's commitment to sustainable development.</p> <p>Traffic and highways</p> <p>It would not be safe to create an access road from the development into Maeslan for the following reasons:</p> <ul style="list-style-type: none"> • Maeslan was built in the sixties and the drives are extremely narrow. Consequently, cars tend to be parked on the road. I've lived here for 38 years and I've never seen cars on the drives of 6 houses (this is particularly true for bungalows where the driveways have not been extended and the steep drives adjacent to the proposed development entrance leading to number 29, 30 etc. Families in these houses tend to park their cars on the road - the cars at number 30 are parked either side of the proposed entrance (which is the only place available for them to park due to the parking congestion in the street). As a site visit was carried out by NPT, I assume that this occurred during the day when the majority of residents (and their cars) were at work! • At the minute, 14 out of the 30 households in Maeslan have one car but realistically the 2 car per household average should be taken into account, as new families moving into Maeslan's 3 / 4 bed properties will have at least this number of vehicles. I live at number 7 and while we can park one car on our drive - we cannot park our adjacent to our neighbour's as we would not be able to get in and out of the vehicle. A new family with 3 cars moved into the street a few months ago and this caused an increase in parking congestion; • I don't feel that there is enough space for a safe entrance including two way traffic and pavements; • Existing from Maeslan into Plas Road is becoming increasingly difficult at peak times due to volume of traffic and increased number of vehicles being parked at the side of the road; • Plas Road cannot always accommodate two lanes of traffic due to parked cars - especially when the community centre and playing fields are being used. Another 150 properties with at least 300 or more cars would exacerbate this problem; • The junction of Plas Road and the A474 is frequently congested and it can take some time to get on to the A474 (especially when trying to turn left) - additional cars would only add to this problem. <p>It would not be safe to create an access road from the development on to the A474 for the following reasons:</p> <ul style="list-style-type: none"> • The A474 is a busy trunk road with a high volume of traffic, especially during rush hours. There is already one junction on the opposite side of the road and a second junction allowing access to the proposed new housing development would cause congestion in this area. Visibility on either side of the new junction would also be limited by sharp corners in both directions and would constitute a road hazard. If a roundabout was fitted then this would bring its own set of problems namely tailbacks and cars idling waiting to enter onto the roundabout, which would increase noise pollution and emissions. • Residents living on the A474 already have difficulty crossing the road and existing their drives. They feel that they are playing Russian Roulette with their lives with the current level of traffic. • The area around the school is a problem area for traffic, especially pick up and drop off times. Additional cars coming from the proposed housing development would add to this problem. Turning right out of Heol y Nant is already problematic as a sharp bend to the left of the junction makes it difficult to turn safely. <p>I have read the Transport Assessment carried out by Asbri Transport (May 2013) and feel that the statistics and information provided is not realistic (or accurate in some cases):</p>	

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					<p>2.3.3 the document refers to Blaenrhondda Primary not Rhos Primary;</p> <p>2.3.8 reference made to a ghost island right turn form Heol y Nant into A474 - this does not exist - we have approx a meter in the middle of the road marked with red diagonal lines but it would be inaccurate to refer to this as a right turn lane;</p> <p>2.4.5 - 30 collisions and 53 casualties is high but I know of at least 1 fatality that has not been mentioned.</p> <p>4.2.8 - predicts only 102 vehicles two way in the morning between 7.30-8.30 am and 116 between 4.30-5.30pm. As there will be 150 family homes with parking allocated per bedroom (maximum of 3 spaces for houses with 3+ bedrooms this is an extremely conservative estimate bearing in mind the number of cars predicted for this development.</p> <p>I appreciate that the entrance into Maeslan and its impact on Plas Road/Maeslan has not been taken into account in the Transport Assessment as this is a recommendation made by NPTC Highways Dept. In order to provide this information, residents carried out their own traffic survey on Friday 11th October 2013 and despite there being an Inset day at Rhos Primary, the following numbers of vehicles were recorded between 7.30 - 9.00am:</p> <ul style="list-style-type: none"> • 174 cars entered / left Plas Road; • 486 vehicles passed heading towards Pontardawe on the A474; • 439 vehicles passed heading towards Neath on the A474. <p>These figures are extremely high but they would have been even higher had there not been an Inset day at the local primary school. Infrastructure and Public Services.</p> <p>As Rhos literally means bog in Welsh, the measures suggested to deal with water drainage and sewerage for the proposed site is not sufficient due to the high level of problems residents are already experiencing:</p> <ul style="list-style-type: none"> • The housing development will have a 'barrage like effect' on water running down from the higher land adjacent to the site; • The 'soakaway' system would still need to feed into the existing drain network which is already inadequate; • Similarly, an upgraded sewerage network in the immediate area would not be sufficient as the sewage would ultimately flow into existing sewer, In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos; • The loss of trees and hedgerows could cause further drainage complications. In this regard, I not the Site Assessment Report states '...trees and hedgerows and a small area of rush pasture, which are LBAP habitat which could be retained within the development or off site mitigation may be an option. <p>Additionally, I don't agree that the Primary Health Services would be able to provide services for such an influx of people. Patients are already struggling to get appointments at Pontardawe Health Centre and are going instead to A & E Departments to be seen. I note that hospitals or more specifically A & E Departments have not been contacted to see if they could cope with the influx of housing / people set out in the Deposit LDP.</p>	
Dep606	Mr and Mrs H Davies		473475	Object	<p>Landscape, Environment & Strategy</p> <p>The development would result in the coalescence of two settlements namely Rhos and Gellinudd. As properties on New Road have Gellinudd postal addresses, the site would bridge the gap which currently exists between the two villages. This would contravene NPT Council's policy to respect the distinctiveness... identity and character of communities by ensuring that they remain as separate settlements. As another site close to Bryn Brych Farm was rejected on the grounds that it would reduce the gap between the communities - this site should therefore be rejected as it connects the two villages.</p> <p>Due to the topography of the surrounding area, the proposed development would have a significant impact on the landscape as it</p>	H1/28 Bryn Brych Farm, Rhos

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Dep622	Mr and Mrs WE and J Davies		709879	Object	<p>1. The new development merges Rhos and Gellinudd of which is against Council Policy.</p> <p>2. We also feel that the traffic situation has not been realistically monitored at either of the proposed entrances to the site.</p> <p>3. The development spoils the visual effect of the area. We would have ribbon development from the beginning of Rhos to the end of Gellinudd as green fields would be replaced by 150 houses.</p> <p>3B</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>Delete an existing site.</p> <p>Over the last approximately 8 years the water table under Maeslas has risen causing extra surface water in the gardens after just one heavy downpour of rain. With roads, houses, hard standing for cars etc. in the fields below the drainage from Maeslan will be impeded as evaporation will be prevented causing water to back up into Maeslan gardens.</p> <p>The sewerage works in Trebanos are having problems at the moment. Can we have assurance that the development will not add to the already existing problems in Rhos.</p> <p>Amend Boundaries of existing site.</p> <p>We think the proposed access to the site via the road at the top of Maeslan. The extra traffic across the top of Maeslan would add to the already difficulties which exist when joining the traffic at the junction of Plas Road and Neath Road. Also the number of cars at Maeslan are continuing to rise as the population is becoming younger. With the younger people having at least two cars. This will also apply to any new development.</p> <p>Traffic Survey</p> <p>A traffic survey was taken by Mrs D Joyce 7 Maeslan and Mr WE Davies 18 Maeslan on October 11th between 7.30 am and 9.00am. The details are attached and signed by Mrs D Joyce and Mr WE Davies.</p>	
Dep601	Ms Heather Davies		709999	Object	<p>Landscape, Environment & Strategy</p> <p>The development would result in the coalescence of two settlements namely Rhos and Gellinudd. As properties on New Road have Gellinudd postal addresses, the site would bridge the gap which currently exists between the two villages. This would contravene NPT Council's policy to respect the distinctiveness... identity and character of communities by ensuring that they remain as separate settlements. As another site close to Bryn Brych Farm was rejected on the grounds that it would reduce the gap between the communities - this site should therefore be rejected as it connects the two villages.</p> <p>Due to the topography of the surrounding area, the proposed development would have a significant impact on the landscape as it would have nothing behind it but sky.</p> <p>As this is a language sensitive location a 10% increase in population would have a detrimental effect on the Welsh language and the measures proposed to negate this impact are not sufficiently robust to counteract the effects of such a large influx of people.</p> <p>The site has two rights of way crossing the land, one officially recognised and another created by the land owner, which has been used to my knowledge for over 30 years, leading from Maeslan to the main road via the farm road. While the Site Assessment Report recognises one of the paths the other needs to be taken into account re: the proposed development.</p> <p>The development would also lead to the loss of farmland, which would go against NPT's commitment to sustainable development.</p> <p>Traffic and highways</p> <p>It would not be safe to create an access road from the development into Maeslan for the following reasons:</p> <ul style="list-style-type: none"> • Maeslan was built in the sixties and the drives are extremely narrow. Consequently, cars tend to be parked on the road. I've lived here for 38 years and I've never seen cars on the drives of 6 houses (this is particularly true for bungalows where the driveways have not been extended and the steep drives adjacent to the proposed development entrance leading to number 29, 30 etc. Families in these houses tend to park their cars on the road - the cars at number 30 are parked either side of the proposed entrance (which is the only place available for them to park due to the parking congestion in the street). As a site 	H1/28 Bryn Brych Farm, Rhos

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>visit was carried out by NPT, I assume that this occurred during the day when the majority of residents (and their cars) were at work!</p> <ul style="list-style-type: none"> • At the minute, 14 out of the 30 households in Maeslan have one car but realistically the 2 car per household average should be taken into account, as new families moving into Maeslan's 3 / 4 bed properties will have at least this number of vehicles. I live at number 7 and while we can park one car on our drive - we cannot park our adjacent to our neighbour's as we would not be able to get in and out of the vehicle. A new family with 3 cars moved into the street a few months ago and this caused an increase in parking congestion; • I don't feel that there is enough space for a safe entrance including two way traffic and pavements; • Existing from Maeslan into Plas Road is becoming increasingly difficult at peak times due to volume of traffic and increased number of vehicles being parked at the side of the road; • Plas Road cannot always accommodate two lanes of traffic due to parked cars - especially when the community centre and playing fields are being used. Another 150 properties with at least 300 or more cars would exacerbate this problem; • The junction of Plas Road and the A474 is frequently congested and it can take some time to get on to the A474 (especially when trying to turn left) - additional cars would only add to this problem. <p>It would not be safe to create an access road from the development on to the A474 for the following reasons:</p> <ul style="list-style-type: none"> • The A474 is a busy trunk road with a high volume of traffic, especially during rush hours. There is already one junction on the opposite side of the road and a second junction allowing access to the proposed new housing development would cause congestion in this area. Visibility on either side of the new junction would also be limited by sharp corners in both directions and would constitute a road hazard. If a roundabout was fitted then this would bring its own set of problems namely tailbacks and cars idling waiting to enter onto the roundabout, which would increase noise pollution and emissions. • Residents living on the A474 already have difficulty crossing the road and existing their drives. They feel that they are playing Russian Roulette with their lives with the current level of traffic. • The area around the school is a problem area for traffic, especially pick up and drop off times. Additional cars coming from the proposed housing development would add to this problem. Turning right out of Heol y Nant is already problematic as a sharp bend to the left of the junction makes it difficult to turn safely. <p>I have read the Transport Assessment carried out by Asbri Transport (May 2013) and feel that the statistics and information provided is not realistic (or accurate in some cases):</p> <p>2.3.3 the document refers to Blaenrhondda Primary not Rhos Primary;</p> <p>2.3.8 reference made to a ghost island right turn form Heol y Nant into A474 - this does not exist - we have approx a meter in the middle of the road marked with red diagonal lines but it would be inaccurate to refer to this as a right turn lane;</p> <p>2.4.5 - 30 collisions and 53 casualties is high but I know of at least 1 fatality that has not been mentioned.</p> <p>4.2.8 - predicts only 102 vehicles two way in the morning between 7.30-8.30 am and 116 between 4.30-5.30pm. As there will be 150 family homes with parking allocated per bedroom (maximum of 3 spaces for houses with 3+ bedrooms this is an extremely conservative estimate bearing in mind the number of cars predicted for this development.</p> <p>I appreciate that the entrance into Maeslan and its impact on Plas Road/Maeslan has not been taken into account in the Transport Assessment as this is a recommendation made by NPTC Highways Dept. In order to provide this information, residents carried out their own traffic survey on Friday 11th October 2013 and despite there being an Inset day at Rhos Primary, the following numbers of vehicles were recorded between 7.30 - 9.00am:</p> <ul style="list-style-type: none"> • 174 cars entered / left Plas Road; • 486 vehicles passed heading towards Pontardawe on the A474; 	

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>• 439 vehicles passed heading towards Neath on the A474.</p> <p>These figures are extremely high but they would have been even higher had there not been an Inset day at the local primary school. Infrastructure and Public Services.</p> <p>As Rhos literally means bog in Welsh, the measures suggested to deal with water drainage and sewerage for the proposed site is not sufficient due to the high level of problems residents are already experiencing:</p> <ul style="list-style-type: none"> • The housing development will have a 'barrage like effect' on water running down from the higher land adjacent to the site; • The 'soakaway' system would still need to feed into the existing drain network which is already inadequate; • Similarly, an upgraded sewerage network in the immediate area would not be sufficient as the sewage would ultimately flow into existing sewer, In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos; • The loss of trees and hedgerows could cause further drainage complications. In this regard, I note the Site Assessment Report states '...trees and hedgerows and a small area of rush pasture, which are LBAP habitat which could be retained within the development or off site mitigation may be an option. <p>Additionally, I don't agree that the Primary Health Services would be able to provide services for such an influx of people. Patients are already struggling to get appointments at Pontardawe Health Centre and are going instead to A & E Departments to be seen. I note that hospitals or more specifically A & E Departments have not been contacted to see if they could cope with the influx of housing / people set out in the Deposit LDP.</p>	
Dep658	Mrs Glenda James		339802	Object	<p>Fear of overloading of sewerage as Trebanos waste water works is liable to overflow spill.</p> <p>Traffic onto Plas Road (extra) not enough room for extra traffic to entrance of Maeslan and exit on to main road.</p>	H1/28 Bryn Brych Farm, Rhos
Dep885	Mr & Mrs David and Sheila Davis		343863	Object	<p>Our main concerns regarding this plan are:</p> <p>[1] A large part of the site crosses into Gellinudd postal area, therefore could be interpreted as the joining of 2 settlements;</p> <p>[2] Where the access points are to the site is on a bend adjacent to Rhos School - this could be a serious hazard.</p>	H1/28 Bryn Brych Farm, Rhos
Dep864	Mr Huw Thomas		782389	Object	<p>Inadequate allocations in Pontardawe which has been identified as a Strategic Growth Area (Para. 2.3.12) and a key settlement in delivering sustainable growth - a number of the sites identified do not at present have planning permission.</p>	H1/28 Bryn Brych Farm, Rhos
Dep852	Mr & Mrs Derrick and Barbara Williams		785958	Object	<p>The size of the proposed development would adversely affect the village ethos of Rhos.</p> <p>Cause greater congestion around the primary school which in turn would increase the risk of the children being involved in accidents.</p> <p>The proposed access road and pedestrian crossing on the A474 would increase the risk of accidents.</p> <p>The proposed access road and pedestrian crossing would make it very difficult for some residents to access their properties in vehicles. This is a main road and vehicles must reverse into their properties to enable them to drive out onto the highway.</p>	H1/28 Bryn Brych Farm, Rhos
Dep884	Mr Jon Morris		786204	Object	<p>I object to building on the Bryn Brych Farm site for the following reasons:</p> <p>This area of land is very prominent and development on it would be out of keeping with the surrounding area. Due to the elevation of the site, existing housing at a lower level would receive surface water run off.</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>We have been told previously that the Trebanos treatment works is just about able to cope with existing housing. Could it cope with a development on this scale?</p> <p>There are known to be problems with the number of people using the Health Centre in Pontardawe. Further housing will increase the demands on the Health Centre and local schools.</p> <p>The location of the site on the A474 would cause problems with traffic. Assuming access to the site used existing roads, the dangers to other road users would increase. Rhos would become a choke point on the A474, especially during peak traffic flow times.</p>	
Dep851	D R & B P Jones		786627	Object	<p>Objection to changes of use of land for housing development in Rhos for Bryn Bach Farm site reference H1/28.</p> <p>My Objection is Based on the following concerns:</p> <p>1) Coalescence of two settlements The site in question will result in the coalescence of Rhos with Gellinudd, there are currently several residences on New Road with a Gellinudd postal address that boarder on the development land. It should be noted that another site near Bryn Brych Farm was rejected on these grounds, as it would have reduced the gap between the communities of Rhos and Gellinudd. All correspondence from the council, Dwr Cymru, and Utility companies etc use New Road Gellinudd SA8 3DY as the postal address, supporting the fact that the development would cause an unacceptable coalescence of both communities.</p> <p>2) The unacceptable volume in traffic The A474 is a bust trunk road, with high traffic volume and motorists travelling in excess of the speed limit. This currently causes a problem for most residents along New road, especially the residents who have to reverse into their drive, as they are legally unable to reverse out.</p> <p>Two residents of New road have recently under taken a traffic volume survey (carried out on the 10/10/2013, between 7.33-8.44am and 4.36-5.44pm). The surveys submitted to the council by the residents shows traffic volumes in excess of the 700 cars in just over 1 hour.</p> <p>An increase of 150 homes (over a 10% increase), will result in an unacceptable increase in the level of traffic, causing an increase in problems of safety, congestion, pedestrian access (depending where the access to the new development would be situated)</p> <p>3) Sewers and Drainage Rhos and some properties in New Road Gellinudd, already experience problems with flooding due to the highways drainage system, the sewerage network, and as a result of the marsh land along the A474.</p> <p>A development of 150 houses will obviously increase the potential for problems to arise for two reasons:</p> <ul style="list-style-type: none"> • A significant increase in drainage, the current infrastructure does not seem to be sufficient for its current requirements. Flooding incidents have been reported on the A474 adjacent to the school, the junction of Delffordd, Pen Y Alltwen Park, the section of March Hywel adjacent to the playing fields, the south west side of Delffordd, Primrose Lane, Maes Y Cornel and properties on Maeslan, which is higher than the current proposed sight and there for may mean that the development sight may be prone to flooding itself. • The reduction in natural soak away pathways, would almost certainly increase run-off water. There has been suggestions that the increase in flooding of some areas is a result of increase run off from the developments of Maes Y Cornel and Cae Rhedyn. There for there is a natural concern that building on raised ground would result in an even greater likelihood of flooding to properties situated below, increasing the risk of property damage and the cost implications that would be occurred. <p>4) Education</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>Rhos Primary school has a capacity of 180 pupils with 146 of these places filled, the development of 150 properties would have a negative impact on the educational provision of pupils with in the area, if the school was not given the funding to adapt and increase its capacity.</p> <p>5) Privacy The current suggested site stands on raised ground, and as a consequence a lot of residents of the surrounding area will lose the privacy of their gardens etc.</p> <p>6) Local Provisions(Amenities etc) There was significant discussion regarding the local amenities at the Local forum. Currently the two villages that the site is proposed on have very few amenities, this is of concern when considering such an increase in population. However it is in my opinion that the consequence of this will also be felt further afield, currently all residents of Rhos and Gellinudd presumably have their health provisions supplied by the health centre in Pontardawe, this will have to deal with the increase not just from this site but other proposed sites around the Pontardawe area. It is currently difficult to obtain an appointment at the centre, due to the fact it has to service such a large population. There for will an increase in the overall population of Pontardawe trigger the development of new health centres/surgeries, dentists, pharmacies etc, and will these be developed to coincide with the increase or developed at a later date when the current system is at breaking point?</p> <p>7) Ecology, Biodiversity Landscape and Environment The site in question borders on the north side by a section of marsh land. Residents of the surrounding area are concerned that the development will have a negative impact on the ecology of this site.</p> <p>The site is also currently farmland, it was suggested in a local forum that the development on farmland does not correspond to current policies and guidelines set by the Welsh national assembly and NPT council on sustainable development. Due to the topography of the surrounding area the proposed development would have significant impact on the landscape from several viewpoints, and leave nothing behind it but sky, an unacceptable consequence.</p> <p>GENERAL COMMENTS</p> <p>There are a considerable amount of brown field sites that are not listed for development and would surely be a better site than the current green field sites proposed.</p> <p>There has been a substantial increase in housing allocation since earlier stages of the LDP plan, why were the original forecasts so wrong?</p>	
Dep604	J.S and D Joyce		786863	Object	<p>Landscape, Environment & Strategy</p> <p>The development would result in the coalescence of two settlements namely Rhos and Gellinudd. As properties on New Road have Gellinudd postal addresses, the site would bridge the gap which currently exists between the two villages. This would contravene NPT Council's policy to respect the distinctiveness... identity and character of communities by ensuring that they remain as separate settlements. As another site close to Bryn Brych Farm was rejected on the grounds that it would reduce the gap between the communities - this site should therefore be rejected as it connects the two villages.</p> <p>Due to the topography of the surrounding area, the proposed development would have a significant impact on the landscape as it would have nothing behind it but sky.</p> <p>As this is a language sensitive location a 10% increase in population would have a detrimental effect on the Welsh language and the measures proposed to negate this impact are not sufficiently robust to counteract the effects of such a large influx of people.</p> <p>The site has two rights of way crossing the land, one officially recognised and another created by the land owner, which has been</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>used to my knowledge for over 30 years, leading from Maeslan to the main road via the farm road. While the Site Assessment Report recognises one of the paths the other needs to be taken into account re: the proposed development.</p> <p>The development would also lead to the loss of farmland, which would go against NPT's commitment to sustainable development.</p> <p>Traffic and highways</p> <p>It would not be safe to create an access road from the development into Maeslan for the following reasons:</p> <ul style="list-style-type: none"> • Maeslan was built in the sixties and the drives are extremely narrow. Consequently, cars tend to be parked on the road. I've lived here for 38 years and I've never seen cars on the drives of 6 houses (this is particularly true for bungalows where the driveways have not been extended and the steep drives adjacent to the proposed development entrance leading to number 29, 30 etc. Families in these houses tend to park their cars on the road - the cars at number 30 are parked either side of the proposed entrance (which is the only place available for them to park due to the parking congestion in the street). As a site visit was carried out by NPT, I assume that this occurred during the day when the majority of residents (and their cars) were at work! • At the minute, 14 out of the 30 households in Maeslan have one car but realistically the 2 car per household average should be taken into account, as new families moving into Maeslan's 3 / 4 bed properties will have at least this number of vehicles. I live at number 7 and while we can park one car on our drive - we cannot park our adjacent to our neighbour's as we would not be able to get in and out of the vehicle. A new family with 3 cars moved into the street a few months ago and this caused an increase in parking congestion; • I don't feel that there is enough space for a safe entrance including two way traffic and pavements; • Existing from Maeslan into Plas Road is becoming increasingly difficult at peak times due to volume of traffic and increased number of vehicles being parked at the side of the road; • Plas Road cannot always accommodate two lanes of traffic due to parked cars - especially when the community centre and playing fields are being used. Another 150 properties with at least 300 or more cars would exacerbate this problem; • The junction of Plas Road and the A474 is frequently congested and it can take some time to get on to the A474 (especially when trying to turn left) - additional cars would only add to this problem. <p>It would not be safe to create an access road from the development on to the A474 for the following reasons:</p> <ul style="list-style-type: none"> • The A474 is a busy trunk road with a high volume of traffic, especially during rush hours. There is already one junction on the opposite side of the road and a second junction allowing access to the proposed new housing development would cause congestion in this area. Visibility on either side of the new junction would also be limited by sharp corners in both directions and would constitute a road hazard. If a roundabout was fitted then this would bring its own set of problems namely tailbacks and cars idling waiting to enter onto the roundabout, which would increase noise pollution and emissions. • Residents living on the A474 already have difficulty crossing the road and existing their drives. They feel that they are playing Russian Roulette with their lives with the current level of traffic. • The area around the school is a problem area for traffic, especially pick up and drop off times. Additional cars coming from the proposed housing development would add to this problem. Turning right out of Heol y Nant is already problematic as a sharp bend to the left of the junction makes it difficult to turn safely. <p>I have read the Transport Assessment carried out by Asbri Transport (May 2013) and feel that the statistics and information provided is not realistic (or accurate in some cases):</p> <p>2.3.3 the document refers to Blaenrhondda Primary not Rhos Primary;</p> <p>2.3.8 reference made to a ghost island right turn form Heol y Nant into A474 - this does not exist - we have approx a meter in the</p>	

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					<p>middle of the road marked with red diagonal lines but it would be inaccurate to refer to this as a right turn lane;</p> <p>2.4.5 - 30 collisions and 53 casualties is high but I know of at least 1 fatality that has not been mentioned.</p> <p>4.2.8 - predicts only 102 vehicles two way in the morning between 7.30-8.30 am and 116 between 4.30-5.30pm. As there will be 150 family homes with parking allocated per bedroom (maximum of 3 spaces for houses with 3+ bedrooms this is an extremely conservative estimate bearing in mind the number of cars predicted for this development.</p> <p>I appreciate that the entrance into Maeslan and its impact on Plas Road/Maeslan has not been taken into account in the Transport Assessment as this is a recommendation made by NPTC Highways Dept. In order to provide this information, residents carried out their own traffic survey on Friday 11th October 2013 and despite there being an Inset day at Rhos Primary, the following numbers of vehicles were recorded between 7.30 - 9.00am:</p> <ul style="list-style-type: none"> • 174 cars entered / left Plas Road; • 486 vehicles passed heading towards Pontardawe on the A474; • 439 vehicles passed heading towards Neath on the A474. <p>These figures are extremely high but they would have been even higher had there not been an Inset day at the local primary school. Infrastructure and Public Services.</p> <p>As Rhos literally means bog in Welsh, the measures suggested to deal with water drainage and sewerage for the proposed site is not sufficient due to the high level of problems residents are already experiencing:</p> <ul style="list-style-type: none"> • The housing development will have a 'barrage like effect' on water running down from the higher land adjacent to the site; • The 'soakaway' system would still need to feed into the existing drain network which is already inadequate; • Similarly, an upgraded sewerage network in the immediate area would not be sufficient as the sewage would ultimately flow into existing sewer, In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos; • The loss of trees and hedgerows could cause further drainage complications. In this regard, I note the Site Assessment Report states '...trees and hedgerows and a small area of rush pasture, which are LBAP habitat which could be retained within the development or off site mitigation may be an option. <p>Additionally, I don't agree that the Primary Health Services would be able to provide services for such an influx of people. Patients are already struggling to get appointments at Pontardawe Health Centre and are going instead to A & E Departments to be seen. I note that hospitals or more specifically A & E Departments have not been contacted to see if they could cope with the influx of housing / people set out in the Deposit LDP.</p> <p>Policy OS2</p> <p>Below are observations in response to the above Policy Statements.</p> <p>1) Deprivation of pre-existing Open Space is known to have a detrimental effect on the health and well-being of established residents.</p> <p>2) There is a Definite shortage of this type of Open Space locally.</p> <p>3) There is a shortfall - a) Open Space, b) Peace & Quiet, c) Walks, d) Surface Water Soak-aways. This area is plagued by flooding.</p>	
Dep725	Mrs A		787461	Object	I am not satisfied that sustainability and environmental issues will be satisfactorily addressed.	H1/28 Bryn Brych Farm,

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	Pickard				<p>My main worry about the Plan is:</p> <p>[1] The increased volume of traffic 2. water drainage.</p> <p>[2] Water drainage. I live at the bottom of Maeslan and my garden is continually waterlogged.</p>	Rhos
Dep924	Miss Rachel Jones		343496	Object	<p>My objection is based upon the following concerns.</p> <p>Coalescence of two settlements</p> <p>I note that the proposal of another site near Bryn Brych Farm has been rejected on the grounds that it would reduce the gap between the communities of Rhos and Gellinudd. But the new development would be an unacceptable intrusion into the countryside as it would result in the coalescence of Rhos and Gellinudd as the properties in front of the development on New Road have a Gellinudd postal address and therefore the new development would be interpreted as the coalescence of the two settlements.</p> <p>All correspondence from the council itself including water rates, council tax, utility bills etc use the New Road Gellinudd postcode - i.e. SA8 3DY.</p> <p>The increases in volume of traffic</p> <p>a) Safety. The A474 is a busy trunk road. The volume of traffic is generally high, particularly during rush hours and motorists frequently exceed the speed limit along this stretch of highway. I cannot turn right when leaving my property as visibility of oncoming traffic from the right is limited and cars often exceed the speed limit. The speed of the traffic coming from Pontardawe and Neath has increased substantially and I feel I am playing Russian roulette with my life.</p> <p>b) Since my last letter dated 12th October 2012 the volume of traffic has increased significantly (see attached traffic survey taken on October 11th between 7.15 and 8.40 am)</p> <p>c) Pedestrian access. Depending on where an access point onto the A474 was placed, a pavement may need to be constructed in order for residents of any new development to have foot access to the main village centre. Several residents noted that dealing with this could be problematic due to the width of the road and the ownership of land along the edge. Mothers with prams and accompanying children, mobility scooters and wheelchair users have difficulties negotiating obstacles e.g. parked cars on pavements and recycling bins (Fridays only). Taking all these points into consideration a new development of 150 properties could exacerbate these existing problems.</p> <p>Privacy</p> <p>Given that the proposed site stands on raised ground and will overlook my garden/ house as well as other neighbouring properties, I am very concerned that my privacy will be compromised.</p> <p>Drainage and Sewerage</p> <p>a) 'Rhos' means marshland! Storm water drainage has already caused flooding problems on the A474. Replacement of existing soakaways with impervious surfaces will exacerbate this problem. Removal of trees, hedgerows and grass will eliminate transpirational clearance and will further increase the risk of land heave and run off water which could cause flooding.</p> <p>b) Could you please inform us how the sewerage net work and lateral drains associated with new development will be connected to the existing system and what will be done to ensure that the infrastructure will cope with demand.</p> <p>c) We noted that whilst an appropriate drainage management system may answer the problem of run-off directly from the developed</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>site the new housing could still create other drainage issues. In particular we feel the housing development could have a 'barrage like effect' on water running down from the higher land adjacent to the site. We feel the 'soakaway' system would still need to feed into the existing drain network which is already inadequate.</p> <p>d) The loss of trees and hedgerows would cause further drainage complications.</p> <p>e) An upgraded sewerage network in the immediate area would not be sufficient as the sewerage would ultimately flow into the existing sewers. In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos.</p> <p>Public Services</p> <p>We have personal experiences of the difficulty in contacting/ making appointments at our local health centre in Pontardawe. We know for certain that this is having a detrimental knock-on effect and impacts on critical parts of the hospital services especially at Morriston A&E.</p>	
Dep923	<p>Mrs S.E. Jenkins</p>		<p>343499</p>	<p>Object</p>	<p>My objection is based upon the following concerns.</p> <p>Coalescence of two settlements</p> <p>I note that the proposal of another site near Bryn Brych Farm has been rejected on the grounds that it would reduce the gap between the communities of Rhos and Gellinudd. But the new development would be an unacceptable intrusion into the countryside as it would result in the coalescence of Rhos and Gellinudd as the properties in front of the development on New Road have a Gellinudd postal address and therefore the new development would be interpreted as the coalescence of the two settlements.</p> <p>All correspondence from the council itself including water rates, council tax, utility bills etc use the New Road Gellinudd postcode - i.e. SA8 3DY.</p> <p>The increases in volume of traffic</p> <p>a) Safety. The A474 is a busy trunk road. The volume of traffic is generally high, particularly during rush hours and motorists frequently exceed the speed limit along this stretch of highway. My husband uses a mobility scooter and I am always very concerned when he has to cross the road outside our house because the speed of traffic can be far too fast.</p> <p>b) Since my last letter dated 12th October 2012 the volume of traffic has increased significantly (see attached traffic survey taken on October 10th between 7.33 and 8.44am and between 4.36- 5.44pm)</p> <p>c) Pedestrian access. Depending on where an access point onto the A474 was placed, a pavement may need to be constructed in order for residents of any new development to have foot access to the main village centre. Several residents noted that dealing with this could be problematic due to the width of the road and the ownership of land along the edge. Mothers with prams and accompanying children, mobility scooters and wheelchair users have difficulties negotiating obstacles e.g. parked cars on pavements and recycling bins (Fridays only). Taking all these points into consideration a new development of 150 properties could exacerbate these existing problems.</p> <p>Drainage and Sewerage</p> <p>a) 'Rhos' means marshland! Storm water drainage has already caused flooding problems on the A474. Replacement of existing soakaways with impervious surfaces will exacerbate this problem. Removal of trees, hedgerows and grass will eliminate</p>	<p>H1/28 Bryn Brych Farm, Rhos</p>

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					<p>transpirational clearance and will further increase the risk of land heave and run off water which could cause flooding.</p> <p>b) Could you please inform us how the sewerage net work and lateral drains associated with new development will be connected to the existing system and what will be done to ensure that the infrastructure will cope with demand.</p> <p>c) We noted that whilst an appropriate drainage management system may answer the problem of run-off directly from the developed site the new housing could still create other drainage issues. In particular we feel the housing development could have a 'barrage like effect' on water running down from the higher land adjacent to the site. We feel the 'soakaway' system would still need to feed into the existing drain network which is already inadequate.</p> <p>d) The loss of trees and hedgerows would cause further drainage complications.</p> <p>e) An upgraded sewerage network in the immediate area would not be sufficient as the sewerage would ultimately flow into the existing sewers. In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos.</p> <p>Public Services</p> <p>We have personal experiences of the difficulty in contacting /making appointments at our local health centre in Pontardawe. We know for certain that this is having a detrimental knock-on effect and impacts on critical parts of the hospital services especially at Morryston A&E.</p>	
Dep918	Dr David Conwil Jenkins		343992	Object	<p>My objection is based upon the following concerns.</p> <p>Coalescence of two settlements</p> <p>I note that the proposal of another site near Bryn Brych Farm has been rejected on the grounds that it would reduce the gap between the communities of Rhos and Gellinudd. But the new development would be an unacceptable intrusion into the countryside as it would result in the coalescence of Rhos and Gellinudd as the properties in front of the development on New Road have a Gellinudd postal address and therefore the new development would be interpreted as the coalescence of the two settlements.</p> <p>All correspondence from the council itself including water rates, council tax, utility bills etc use the New Road Gellinudd postcode - i.e. SA8 3DY.</p> <p>The increases in volume of traffic</p> <p>a) Safety. The A474 is a busy trunk road. The volume of traffic is generally high, particularly during rush hours and motorists frequently exceed the speed limit along this stretch of highway. I use a mobility scooter and I am always very concerned when I have to cross the road outside my house because the speed of traffic can be far too fast.</p> <p>b) Since my last letter dated 12th October 2012 the volume of traffic has increased significantly (see attached traffic survey taken by my wife on October 10th between 7.33 and 8.44am and between 4.36- 5.44pm)</p> <p>c) Pedestrian access. Depending on where an access point onto the A474 was placed, a pavement may need to be constructed in order for residents of any new development to have foot access to the main village centre. Several residents noted that dealing with this could be problematic due to the width of the road and the ownership of land along the edge. Mothers with prams and accompanying children, mobility scooters and wheelchair users have difficulties negotiating obstacles e.g. parked cars on pavements and recycling bins (Fridays only). Taking all these points into consideration a new development of 150 properties could exacerbate</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>these existing problems.</p> <p>Drainage and Sewerage</p> <p>a) 'Rhos' means marshland! Storm water drainage has already caused flooding problems on the A474. Replacement of existing soakaways with impervious surfaces will exacerbate this problem. Removal of trees, hedgerows and grass will eliminate transpirational clearance and will further increase the risk of land heave and run off water which could cause flooding.</p> <p>b) Could you please inform us how the sewerage net work and lateral drains associated with new development will be connected to the existing system and what will be done to ensure that the infrastructure will cope with demand.</p> <p>c) I noted that whilst an appropriate drainage management system may answer the problem of run-off directly from the developed site the new housing could still create other drainage issues. In particular I feel the housing development could have a 'barrage like effect' on water running down from the higher land adjacent to the site. I feel the 'soakaway' system would still need to feed into the existing drain network which is already inadequate.</p> <p>d) The loss of trees and hedgerows would cause further drainage complications.</p> <p>e) An upgraded sewerage network in the immediate area would not be sufficient as the sewerage would ultimately flow into the existing sewers. In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos.</p> <p>Public Services</p> <p>I have personal experiences of the difficulty in contacting /making appointments at my local health centre in Pontardawe. I know for certain that this is having a detrimental knock-on effect and impacts on critical parts of the hospital services especially at Morrision A&E.</p>	
Dep1241		Rhos Community	745634	Object	<p>During the period of the LDP consultation many residents in my ward have contacted me to discuss the Deposit Plan and, in particular, the housing allocation at Bryn Brych Farm in Rhos. A number of these residents have questioned the soundness of the LDP. At their request I write to convey their views to you.</p> <p>Several people living on Maeslan and Plas Road are concerned at the effect that a development 150 houses could have on these roads. They tell me that these highways are frequently congested at peak travel times, especially at the junction with the A474. They note that the Traffic Assessment used in the process of assessing this candidate site does not appear to consider the impact that a secondary entrance to the development could have on their streets. I understand that some of these residents have conducted a traffic survey which they have submitted with their own responses. They have also questioned whether the track which connects the fields which form the Bryn Brych allocation with Maeslan is wide enough to function as an access point to a housing estate. Residents living along New Road (the A474) have also raised the issue of traffic movements, commenting that they frequently have difficulty exiting their drives in the morning due to the volume and speed of traffic along this stretch of highway. They fear that the additional traffic generated by a development in this area, combined with the a possible reconfiguration of the road layout, would exacerbate this problem. Doubts have also been expressed as to whether a staggered junction or roundabout allowing access from the A474 could cope with the volume of traffic.</p> <p>Concerns have also been expressed to me regarding the capacity of the wider public infrastructure in the Rhos and Pontardawe areas. The question as to whether the local Primary School would have sufficient capacity without renovation was raised. On a related point one resident commented that there is already insufficient parking around the school and that this is a frequent cause of congestion. It was felt that the proximity of the potential access point to the school road made this particularly relevant.</p> <p>It was also suggested that the Bryn Brych development, and other developments in the Pontardawe area, would negatively impact</p>	H1/28 Bryn Brych Farm, Rhos

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>upon primary health services. I was told that patients are apparently experiencing difficulties when making appointments at one of the GPs practices in Pontardawe and that this was already having an effect on critical parts of the hospital service as patients were presenting at Morriston A&E because they had been unable to make a GP appointment.</p> <p>Regarding water drainage, whilst those members of the public I have spoken to understand that any development would need to achieve green field levels of run-off, a number tell me they feel that the housing development could block water flowing from higher land near the site. They fear that this could make existing surface flooding problems worse. A Maeslan resident noted that the drainage management system would still need to feed into the existing drain network which, he said, was already inadequate.</p> <p>Similarly, he commented that the sewer capacity in the area would, in his view, need to be increased as far as the treatment works in Trebanos if the new development was not to create substantial difficulties for the movement of sewerage from the village. In relation to this another resident was concerned at the lack of clarity regarding the funding of any necessary improvements to the sewerage system, particularly as the allocation is one of those scheduled for development in the initial stages of the plan. He felt that the level of infrastructure improvement, in terms of roads, drainage and sewers, required for the development threw into question the deliverability of the allocation.</p> <p>In terms of the wider environmental impact of the allocation, one resident questioned the officer's assessment of the quality of farm land that composes the site. They believe that the development of the site would result in the loss of a significant natural resource and, therefore challenged the sustainability of the allocation. Another resident has commented that any building on the site would, due to its elevated position and distance from features that would provide a background to it, have an intrusive effect on the local landscape. I was also informed by several members of the public living on New Road that their houses had Gellinudd postal addresses, whereas as those on Maeslan are part of Rhos. They therefore considered that the proposed allocation would be contrary to the policy of avoiding settlement coalescence.</p>	
Dep1373	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p> <p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep925	Mr W L Jones		786609	Object	<p>My objection is based upon the following concerns.</p> <p>Coalescence of two settlements</p> <p>I note that the proposal of another site near Bryn Brych Farm has been rejected on the grounds that it would reduce the gap between the communities of Rhos and Gellinudd. But the new development would be an unacceptable intrusion into the countryside as it would result in the coalescence of Rhos and Gellinudd as the properties in front of the development on New Road have a Gellinudd postal address and therefore the new development would be interpreted as the coalescence of the two settlements.</p> <p>All correspondence from the council itself including water rates, council tax, utility bills etc use the New Road Gellinudd postcode - i.e. SA8 3DY.</p> <p>The increases in volume of traffic</p> <p>a) Safety. The A474 is a busy trunk road. The volume of traffic is generally high, particularly during rush hours and motorists frequently exceed the speed limit along this stretch of highway. I cannot turn right when leaving my property as visibility of oncoming traffic from the right is limited and cars often exceed the speed limit. The speed of the traffic coming from Pontardawe and Neath has increased substantially and I feel I am playing Russian roulette with my life.</p> <p>b) Since my last letter dated 12th October 2012 the volume of traffic has increased significantly (see attached traffic survey taken on October 11th between 7.15 and 8.40 am)</p> <p>c) Pedestrian access. Depending on where an access point onto the A474 was placed, a pavement may need to be constructed in order for residents of any new development to have foot access to the main village centre. Several residents noted that dealing with this could be problematic due to the width of the road and the ownership of land along the edge. Mothers with prams and accompanying children, mobility scooters and wheelchair users have difficulties negotiating obstacles e.g. parked cars on pavements and recycling bins (Fridays only). Taking all these points into consideration a new development of 150 properties could exacerbate these existing problems.</p>	H1/28 Bryn Brych Farm, Rhos

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>Privacy</p> <p>Given that the proposed site stands on raised ground and will overlook my garden/ house as well as other neighbouring properties, I am very concerned that my privacy will be compromised.</p> <p>Drainage and Sewerage</p> <p>a) 'Rhos' means marshland! Storm water drainage has already caused flooding problems on the A474. Replacement of existing soakaways with impervious surfaces will exacerbate this problem. Removal of trees, hedgerows and grass will eliminate transpirational clearance and will further increase the risk of land heave and run off water which could cause flooding.</p> <p>b) Could you please inform us how the sewerage net work and lateral drains associated with new development will be connected to the existing system and what will be done to ensure that the infrastructure will cope with demand.</p> <p>c) We noted that whilst an appropriate drainage management system may answer the problem of run-off directly from the developed site the new housing could still create other drainage issues. In particular we feel the housing development could have a 'barrage like effect' on water running down from the higher land adjacent to the site. We feel the 'soakaway' system would still need to feed into the existing drain network which is already inadequate.</p> <p>d) The loss of trees and hedgerows would cause further drainage complications.</p> <p>e) An upgraded sewerage network in the immediate area would not be sufficient as the sewerage would ultimately flow into the existing sewers. In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos.</p> <p>Public Services</p> <p>We have personal experiences of the difficulty in contacting making appointments at our local health centre in Pontardawe. We know for certain that this is having a detrimental knock-on effect and impacts on critical parts of the hospital services especially at Morriston A&E.</p>	
Dep917	A Jones		786612	Object	<p>My objection is based upon the following concerns.</p> <p>Coalescence of two settlements</p> <p>I note that the proposal of another site near Bryn Brych Farm has been rejected on the grounds that it would reduce the gap between the communities of Rhos and Gellinudd. But the new development would be an unacceptable intrusion into the countryside as it would result in the coalescence of Rhos and Gellinudd as the properties in front of the development on New Road have a Gellinudd postal address and therefore the new development would be interpreted as the coalescence of the two settlements.</p> <p>All correspondence from the council itself including water rates, council tax, utility bills etc use the New Road Gellinudd postcode - i.e. SA8 3DY.</p> <p>The increases in volume of traffic</p> <p>a) Safety. The A474 is a busy trunk road. The volume of traffic is generally high, particularly during rush hours and motorists frequently exceed the speed limit along this stretch of highway. I cannot turn right when leaving my property as visibility of oncoming traffic from the right is limited and cars often exceed the speed limit. The speed of the traffic coming from Pontardawe</p>	H1/28 Bryn Brych Farm, Rhos

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					<p>and Neath has increased substantially and I feel I am playing Russian roulette with my life.</p> <p>b) Since my last letter dated 12th October 2012 the volume of traffic has increased significantly (see attached traffic survey taken on October 11th between 7.15 and 8.40 am and between 4.30- 6.00pm). I realise that this is a simplistic method of collecting data but I live on this busy stretch of road and I have to tolerate this increase in volume and speed of vehicles. It has now reached a stage where I am very nervous trying to come out of my drive to access New Road. I fear that another serious accident could soon take place on this busy A474.</p> <p>c) Pedestrian access. Depending on where an access point onto the A474 was placed, a pavement may need to be constructed in order for residents of any new development to have foot access to the main village centre. Several residents noted that dealing with this could be problematic due to the width of the road and the ownership of land along the edge. Mothers with prams and accompanying children, mobility scooters and wheelchair users have difficulties negotiating obstacles e.g. parked cars on pavements and recycling bins (Fridays only). Taking all these points into consideration a new development of 150 properties could exacerbate these existing problems.</p> <p>Privacy</p> <p>Given that the proposed site stands on raised ground and will overlook my garden/ house as well as other neighbouring properties, I am very concerned that my privacy will be compromised.</p> <p>Drainage and Sewerage</p> <p>a) 'Rhos' means marshland! Storm water drainage has already caused flooding problems on the A474. Replacement of existing soakaways with impervious surfaces will exacerbate this problem. Removal of trees, hedgerows and grass will eliminate transpirational clearance and will further increase the risk of land heave and run off water which could cause flooding.</p> <p>b) Could you please inform us how the sewerage net work and lateral drains associated with new development will be connected to the existing system and what will be done to ensure that the infrastructure will cope with demand.</p> <p>c) We noted that whilst an appropriate drainage management system may answer the problem of run-off directly from the developed site the new housing could still create other drainage issues. In particular we feel the housing development could have a 'barrage like effect' on water running down from the higher land adjacent to the site. We feel the 'soakaway' system would still need to feed into the existing drain network which is already inadequate.</p> <p>d) The loss of trees and hedgerows would cause further drainage complications.</p> <p>e) An upgraded sewerage network in the immediate area would not be sufficient as the sewerage would ultimately flow into the existing sewers. In order to prevent a backlog the sewerage infrastructure would need to be upgraded up to the treatment plant at Trebanos.</p> <p>Public Services</p> <p>We have personal experiences of the difficulty in contacting /making appointments at our local health centre in Pontardawe. We know for certain that this is having a detrimental knock-on effect and impacts on critical parts of the hospital services especially at Morryston A&E.</p>	
Dep1374	Mr Richard Davies		785950	Object	<p>The Local Development Plan is based on an Economic - Led Growth Strategy. Therefore the economic growth prediction is critical to the plan. NPT council commissioned a private company to prepare a report. The highest growth scenario of this report was then adopted exactly for the LDP. If 2 or 3 separate individual reports had been commissioned would they have given the same predictions. I think not. Therefore, plain acceptance of one set of values from this report does not seem appropriate.</p>	H1/29 Compair / GMF, Ystalyfera

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					<p>The economic report was prepared by Peter Brett Associates. They used base data from another company EE. This original macro data predicted a decline in NPT jobs by 2,181 over the period. This base data included a 34% reduction in 'metal products' jobs & a 72% reduction in 'specialist construction activities' jobs. Due to local circumstances these reductions were considered inappropriate and were set to zero % change. This appears a very arbitrary adjustment. This lead to an overall 1,789 jobs growth over the period. This scenario was called EE(adj). Then due to other local influences a nominal 20% upswing was applied to various employment sectors. This added just over 2,000 more jobs to the prediction. The total became 3,850. This 20% upswing was also applied to a range of employment sectors in the Swansea plan. To use the same value in 2 different areas and for different employment sectors again appears very arbitrary.</p> <p>Therefore the overall change in job numbers were from -2,181 to +3,850. A change value of 6,031. Does NPT have economic changes coming that will move the area away from the macro position by this extent ? I would be very surprised.</p> <p>The PBA report gave 2 scenarios. The EE adj scenario gave new jobs 1,789 , a population increase of 2,387 & 5,727 new homes requirement. The EE adj+ scenario (the one taken for the LDP) gave new jobs 3,850 , a population increase of 7,043 & new homes requirement of 8,027.</p> <p>Another report 'WG 2008' was referenced by PBA. This was a population prediction report. This gave future predictions based on past trends. Birth / death rates can usually be trended forward, but migration assumptions are often less robust because they can vary significantly year on year. The WG 2008 was based on only 5 years history. The prediction result of +500 migration per year has only occurred in 3 out of the last 17 years. This report gave a population increase of 8,812.</p> <p>I give 2 quotations from the PBA report. 1) "Forecasts of future employment land requirements reflect a snapshot in time and, like all forecasts, are never certain and often wrong." 2) "Whilst considered ambitious Peter Brett Associates recommend that this is an achievable target, but suggest that both Council's should monitor economy activity rates, job growth and migration rates in their Annual Monitoring Report (AMR) as part of a plan, monitor and manage approach."</p> <p>I build on these 2 quotations to make my proposal. Greenfield New Allocation land should be held back in the LDP. Land Bank & Brownfield New Allocation should only be released. The Land Bank number is 3,822. The Brownfield New Allocation number is 1,433. The total therefore being 5,255. Please note the EE adj homes requirement of 5,727. Only a small gap, considering the level of assumptions made to obtain this prediction. This way forward would support Key Issue 14 focusing re-development of our brownfield sites and also support KI 11 & 12 - saving our greenfields.</p> <p>Only if the predicted jobs increase is being delivered as evidenced in the AMR should greenfield sites be released. The reporting of economic activity rates & jobs growth should be a headline for this report. At the moment the report seems to be planning to report against the deliverables of the plan but not including checking on the status of the key assumptions that underpin the making of the plan.</p> <p>I see very little drawback with adopting this step approach to the plan. Predicting over 15 years for the economy is impossible. I note that on top of the EE adj+ , a further upward flexibility is given to reach the homes increase end number of 9,150. Why are all the adjustments and flexibility upwards. With the degree of likely error within the predictions of economic growth, downward flexibility is also surely needed to make the LDP sound & robust.</p>	
Dep446	Mr Eric Lewis		324744	Object	<p>Housing Site H1/LB/13 lies at an elevated position, being a Greenfield site, extending eastwards into open countryside beyond the built envelope of Baglan.</p> <p>The site consists of some 10.2 hectares of sloping grazing land, which if developed will have a significant, adverse effect upon the character and setting of the landscape overlooking Baglan. It will be seen as urban sprawl, unrelated to the general spatial pattern of housing with this part of the Port Talbot Spatial Area.</p> <p>The site is separated from the consolidated built form of Baglan by an extensive, dense area of woodland, set along the banks of a</p>	H1/LB/13 Blaenbaglan Farm, Baglan

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>deep natural ravine and watercourse. Access through this ravine is only capable via a narrow bridge crossing upon Heol Bwlch. As such the development of this site would appear completely divorced from the settlement, completely unrelated to the development pattern. The road improvements necessary to develop this site for 260 units would require widening of the existing country road, and in the process damaging areas of acknowledged local biodiversity within that woodland.</p> <p>The above mature woodland forms a defensive barrier separating the built form of eastern Baglan from surrounding countryside, and should be fully preserved.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. It advocates that sites should avoid being allocated where there is the potential harm and damage to the local landscape, and that the countryside should be protected for its own sake.</p> <p>The site was not allocated within the Neath-Port Talbot Unitary Development Plan as a Housing Allocation, and thus advocating a distinct lack of evidence of any historic or extant planning permission. The site is now allocated as part of the Housing Landbank, suggesting that it does benefit from a commencement of an historic planning permission, and therefore allegedly extant. The continued presence of an historic extant permission, even if that evidence is substantiated, should not give weight to the allocation of the site within the LDP as a housing site. The lack of a formal meaningful commencement, or any genuine attempt to implement such a permission must call into question its past, present or future deliverability to the market.</p> <p>The LDP does not contain any Deliverability Statement to illustrate which, if any of the Housing Site Allocations can genuinely come forward for development within the Plan Period. The complete absence of any meaningful attempt to deliver this site must form a significant material consideration as to whether it should be allocated within this development plan.</p> <p>The site should not contribute to the allocation of housing under Policy H1 for the above reasons. Its allocation of 260 units should be re-distributed elsewhere in the Port Talbot Spatial Area.</p>	
Dep619	Mr V Price		196316	Object	H1/LB13 The site is constrained by flood risk and has significant traffic problems. It is noted that H1/LB13 (Blaenbaglan Farm) is in the landbank. but the new proposal for c141 dwellings at Blaenbaglan School would be inappropriate given the need to plan for the consequences of climate change and reduce the risk of flooding.	H1/LB/13 Blaenbaglan Farm, Baglan
Dep450	Mr Eric Lewis		324744	Object	Housing Site H1/LB/14 at Thorney Road and Cae Canol has been completed. All 10 units as allocated within the Plan have long since been occupied, which suggested that at the Plan's base date for recording commitments to be added to the LDP Housing Land Bank, this site was almost complete. The site should not contribute to the allocation of housing under Policy H1 for the above reason.	H1/LB/14 Thorney Road, Baglan
Dep448	Mr Eric Lewis		324744	Object	Housing Site H1/LB/15 lies within a Zone C2 floodplain. Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. It advocates that sites should avoid being allocated where there is the potential for risks from flooding. Paragraph 10.8 of Technical Advice Note (TAN) 15: "Development and Flood Risk" stipulates that highly vulnerable development, such as new residential development, should not be allocated with a Zone C2. The site should not contribute to the allocation of housing under Policy H1 for the above reason. Furthermore, its development is largely complete, having been constructed prior to 2011.	H1/LB/15 Stycyllwen, Baglan
Dep447	Mr Eric Lewis		324744	Object	Housing Site H1/LB/16 lies within a Zone C1 floodplain. Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. It advocates that sites should avoid being allocated where there is the potential for risks	H1/LB/16 Abbottsmoor, Baglan Moors

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>from flooding.</p> <p>Paragraph 10.7 of Technical Advice Note (TAN) 15: "Development and Flood Risk" stipulates that highly vulnerable development, such as new residential development, should not be allocated away from a Zone C1.</p> <p>The site should not contribute to the allocation of housing under Policy H1 for the above reason. Furthermore, its development is largely complete, having been constructed prior to 2011.</p>	
Dep440	Mr Eric Lewis		324744	Object	<p>Housing Site H1/LB/18 lies within a Zone C2 floodplain, being the fluvial floodplain of the River Afan.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. It advocates that sites should avoid being allocated where there is the potential for risks from flooding.</p> <p>Paragraph 10.8 of Technical Advice Note (TAN) 15: "Development and Flood Risk" stipulates that highly vulnerable development, such as new residential development, should not be allocated with a Zone C2.</p> <p>The site should not contribute to the allocation of housing under Policy H1 for the above reason. Furthermore, its development is largely complete, having been constructed prior to 2011.</p>	H1/LB/18 Copperminers, Cwmafan
Dep875	Laura Tams		786576	Object	<p>I wish to object to the potential housing developments highlighted in the LDP in relation to Bryn Morgrug phase 1 & 2 and also Ynysymond Road, Alltwen.</p> <p>In relation to H1/24 and H1/LB/30 (Brynmorgrug Phase 1 and 2) I am astonished that this is even being considered, as a Community Councillor I am constantly being stopped by my constituents who have serious concerns over the inadequate highway infrastructure at Lon Hir (the only entrance and access to this proposed site) this highway already has safety concerns for both vehicles and pedestrians. A second access route would be essential for any further developments within this already over crowded area. I would politely remind Officers of NPTCBC of the Persimmon Homes development at Gelli Gron who were required to build a new entrance to their site - why is this area with Bryn Morgrug any different? The area is a cul-de-sac and as such has legislative restrictions - why are NPT Officers disregarding this fact?</p> <p>This area has already seen an increase with Redrow building some 57 homes, and any further development will cause chaos on what are already overused road's (Lon Hir and Edward Street). Edward Street is constantly seeing vehicles accessing the area the wrong way - this is somewhat down to poor one way signage but also undoubtedly the new estate created by Redrow and incorrect information from Satellite Navigation Units.</p> <p>Further more the LDP does not recognise the 'WDA'site that has been the subject of planning enquiry and possibly an application. If this were taken into account the bottom of Lon Hir would see additional houses in excess of 150, this is without taking into account the already agreed Redrow phase one site of 57 houses.</p> <p>To conclude on this site the three potential sites should form one sensible planning application.</p> <p>Should these areas be approved for development Alltwen will be moving away from its village status due to being hugely overpopulated. Schools and other public facilities within the area will be flooded - a recent ESTYN inspection showed that the school is not performing well, we do not need added pressure on the School with potentially 200+ children that would need school places from some 160 suggested homes.</p>	H1/LB/30 Bryn Morgrug, Alltwen (Phase 1)
Dep878	A.K. Taylor		786579	Object	<p>I am writing to object to the LDP that has proposed an extra 200 houses in the village of Alltwen. There is already an insufficient road structure throughout the village of Alltwen, leading to the town of Pontardawe and cannot believe there is no road improvement plan to support the proposed housing plans. Ynysymond is surrounded by narrow, winding country roads which locals are already wary of using because of the miss-use of other drivers driving dangerously. However I am even more concerned with the proposed</p>	H1/LB/30 Bryn Morgrug, Alltwen (Phase 1)

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>plan of adding another 51 houses (Phase 2) to the end of the Lon Hir, Brynmorgrug and Edward Street where 56 houses have already been built (Phase 1). There is only one entrance and exit along Lon Hir for the 200 plus houses already built and yet there is a proposal for another 51 houses in place with no plans to introduce a second entrance and exit. When the Phase 1 planning was granted in the 70's there were 2 entrances and exits to this cu-de-sac with a 3rd proposed and leading onto Graig Road. My concerns are increased because I know that Redrow have bought the Aladdin Industrial Estate and believe there will be another 100 houses proposed to be built on this land. The road along Lon Hir is not a main road and was not built to support this much traffic. Most residents park off the road on their drives and are already struggling to leave and join the road because of the increase of traffic and the speed cars travel down Lon Hir despite the road bumps. Dangerously (due to there being only one road leading to this cul-de-sac) any emergency needing the road to be shut, would cut off all residents resulting in no one being able to enter or leave the cul-de-sac. My other concern is the traffic on the roundabout outside the school, and the other roundabouts leading to the town centre and towards Tesco. There is already a heavy build up of traffic and at times vehicle queues are backing up from one roundabout to another. Can Pontardawe, a town with the 2nd highest vehicle collision rate (Road Safety data), cope with more traffic? As well as the insufficient road structures, Alltwen Primary School already has a very high pupil intake and Estyn has requested that the school must not be put under anymore pressure so where would the children from these new estates go to school?</p> <p>Overall I cannot see how the proposed LDP for the village of Alltwen can be seriously taken into account as I have only touched on the objections I and others have. I have not mentioned the poor sewerage systems that Alltwen has and the increase other local services will endure such as the Health Service, Fire Service to name a few.</p>	
Dep892	Mrs Nicola O'Sullivan		786580	Object	<p>I wish to raise my objections regarding the LDP and its proposals regarding Alltwen.</p> <p>The specific areas I oppose are: H1/LB/30 Bryn Morgrug (Phase 1) (56 houses) and H1/24 Bryn Morgrug (Phase 2) (52 houses).</p> <p>I object to these on the following grounds:</p> <ul style="list-style-type: none"> • Phase 1 and 2 are in addition to the development at Alltwen Gardens and the additional planning proposal for houses on the old factory site. This would add an additional 200 houses to this small area and have a significant detrimental impact on residents already living in the area. • There are already traffic and highway issues for residents since the development of Alltwen Gardens, at certain times of the day cars wishing to enter Lon Hir have to wait on the roundabout as cars double park and mean only one car either way can enter. • The road is not adequate to service this level of traffic, there is a single access into a cul-de-sac and the addition of a further 200 houses, with the additional traffic will present safety issues - if there is an accident / gas leak etc the whole cul de sac is cordoned off with no access. • The junction entering Lon Hir struggles with existing traffic, it is likely to get worse and will not cope with the additional traffic. The road between Lon Hir and Brynmorgrug is not adequate to manage the additional traffic. • Pontardawe already has the 2nd highest collision in Neath Port Talbot and I can only see this development having a further negative impact on this figure. • A development of this magnitude would necessitate an additional entrance/ exist to make it safe or viable. • There are concerns about the drainage and the wildlife that already exists on these sites. • Phase 2 is a proposal outside the village boundary, which is not acceptable. <p>These proposals together would have a significant and detrimental effect on the village of Alltwen, it will detrimentally affect the character of the village.</p> <p>I question whether the impact of development of this scale and magnitude had considered the impact on local infrastructure as well as the capacity of local schools and healthcare providers to accommodate growth of this scale.</p>	H1/LB/30 Bryn Morgrug, Alltwen (Phase 1)
Dep872	Elizabeth Jones		786632	Object	<p>The deposit plan identifies Pontardawe as a language sensitive area, and key issue 18 states that "the erosion of the Welsh language is a concern in many of the valley communities". Pontardawe has also been identified as a strategic growth area, and therefore has considerable housing allocations, and is classified as a town in table 3.1 in the deposit plan. Alltwen is classified as a 'small local</p>	H1/LB/30 Bryn Morgrug, Alltwen (Phase

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
					<p>centre' in the same table. Over 25% of the housing allocation for Pontardawe is sited in Alltwen.</p> <p>The Sustainability Appraisal notes that the Menter Iaith Castell Nedd Port Talbot study of the new housing development in Godre'r-Graig and supplementary study in Ystradgynlais concluded that large scale housing development in the Swansea valley will tend to contain a lower percentage of Welsh speakers [when compared with the area of existing housing] and as such will have an impact on the fabric of the community. The Sustainability Appraisal also finds that the allocations in Pontardawe are likely to have a negative impact on the linguistic balance of the area. Neath Port Talbot Council's Neighbourhood Profile for Alltwen Ward (using data from the 2001 UK census) states that there are 916 households in Alltwen. The allocation set out in the deposit plan will increase the households in Alltwen by 17%. This is a considerable increase. There is therefore an inconsistency between the Sustainability Appraisal and the allocations in the deposit plan, and despite evidence demonstrating that new developments have an impact on the fabric of the community, and a negative impact on the linguistic balance of the community, Alltwen, part of that area identified as a language sensitive area, has a considerable housing allocation. The measures proposed to address the negative impact on the Welsh language cannot be trusted with any measure of guarantee to have any positive influence whatsoever. The deposit plan notes that Neath Port Talbot's Single Integrated Plan vision is to "create a Neath Port Talbot where everyone has an equal opportunity to be healthier, happier, safer and prosperous". In the community of Alltwen, where the proposed development is likely to have a negative impact on the fabric of the community, there would seem to be very little opportunity to be happier, and to ensure the plan is made sound these three allocations in Alltwen need to be removed.</p> <p>The impact on local schools has, in my view, not been taken into account. A recent Estyn report on Alltwen showed that the school was underachieving: with a large influx of children from the additional houses resulting from this plan will put additional pressure on the school.</p> <p>In addition the transport section does not reflect the issues accompanying the allocations. There already exist problems in the Lon Hir/Edward Street/Brynmorgrug area of Alltwen, where, due to council changes to the road system in the past, there now exists a large cul de sac with congested entrance/exit. With the additional cars using these roads as a result of H1/LB/30 and the proposed H1/24 (and possibly even more houses in the future) - an additional 108 houses at minimum - this situation will get worse. Should there be an accident or incident leading to the entrance to Lon Hir being blocked there would be no road access to the area for either residents or emergency vehicles. A new, separate, access to either Graig Road (A474) or the A4067 should be required as part of any new development here.</p>	1)
Dep1345	Mr David Lewis		784929	Object	<p>Currently, 56 Houses are being built on an adjacent Landbank Site (H1/LB/30). This site proposes a further 50+ houses and then there is the adjacent site of The Lon Hir Industrial Estate. This site is not included in the proposals but has been the subject of an enquiry to the planning department for a consent to build a further 50 houses. Its non inclusion in the plan appears deceitful and hides the fact that the combined sites could be easily developed for a total of over 150 Houses. All accessed off the Lon Hir/A474 Graig Road roundabout.</p> <p>I have made repeated representations to the planners that the development of 150 houses off a cul-de-sac is ridiculous without an additional access being provided to the area of proposed developments</p> <p>Again, repeated requests for investigations into additional routes in the area of development off the A4067 below. A possible route has been identified but any talk of it being built has been met with the incremental development of the three separate components would not justify the imposition of the cost of the road.. However, if the development was seen as a coherent integrated site then the cost could be justified.</p> <p>Should The Land Bank Site Hi/LB/30), H1/24 and the Industrial Estate be submitted as an integrated development with access off the A4067 being provided I would withdraw my objections.</p> <p>A further important point concerns the deliverability of developments on the three sites, be they integrated into coherent development or not, must recognise the current development is not selling. Redrow, the current developers, have made repeated representations to me that Local Authority/ WG regulations on house builders makes sites such as this one nonviable now and in the future.</p>	H1/LB/30 Bryn Morgrug, Alltwen (Phase 1)

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT	Site
Dep1348	Mr Hywel Morgan		785350	Object	<p>I would like to object to the inclusion of this allocation in the Local Development Plan (LDP) for the following reasons:</p> <ol style="list-style-type: none"> 1. The proposal does not include the WDA site at the end of Lon Hir (Phase 3) which has also been the subject of a planning enquiries and possibly an application for over 50 houses. If 'phase 3' was included within the proposal (I view it as underhanded that it is not) it would take the proposed development to over 150 houses. Also, I am led to believe that Redrow now owns this site which further indicates it's intention to develop it. 2. The fact is, there is only one entrance and exit to Lon Hir, Edward Street, Bryn Morgrug and now Alltwen Gardens (phase 1, 2 & 3) which means the entire area has become a giant cul de sac. I believe the development has been purposely 'phased' in order to avoid legislation with regards limiting the scale of development in relation to a cul de sac. This needs to be re-assessed. 3. When planning was originally awarded for the Bryn Morgrug development there were 2 access routes via Lon Hir & Edward Street , with a third entrance cut in from Graig road (although this never became a finished road, the fact it was proposed and marked out at the time highlighted the need for an additional road to service the Bryn Morgrug development). 4. The road traffic capacity of Lon Hir should be reviewed. Due to residents parking close to the entrance of Lon Hir it effectively becomes a single narrow lane often causing a bottle neck out on to the roundabout. It is only a matter of time before an accident occurs due to cars queuing to enter Lon Hir and traffic hurtling onto the roundabout via the fly over bridge. The risk of this will increase significantly if a further 150 + houses are built and traffic volumes are increased by at least 150 cars, though a more accurate figure would probably be closer to 300 cars considering the current norm for multi car ownership per household. 5. Point 4 is also made worse due the Alltwen primary school run, with cars parking at the entrance to Lon Hir further exacerbating the access situation at peak periods of the day when people are going to and in some cases returning from work. Add to that a further possible 150+ households doing the same and the problems will escalate. 6. As Lon Hir is the only access point to Edward Street, Bryn Morgrug and now Alltwen Gardens if an accident or blockage was to occur at the entrance or on the roundabout it would effectively prevent the emergency services reaching anyone beyond the entrance. A blockage for whatever reason at the entrance would also prevent around 500 people from leaving there homes to carry out there daily business. 7. The road layout at the end of Lon Hir is totally unsuitable to carry any large volume of traffic, the 2 right hand 'blind corners' create a dangerous pedestrian crossing area (especially for children & the elderly). 8. I'm aware that two thirds of the proposed development sits outside the current village boundary contravening current regulations. 9. If the development is given the go ahead then phase 1,2 & 3 should be viewed as a whole. Due to its scale the development must include as a condition for the developers a new and separate access either off Graig Road (as originally intended many years ago) or from the A4067 below. There is precedent for this as an additional entrance was constructed for the Persimmon development at Gelli Gron, Pontardawe. 	H1/LB/30 Bryn Morgrug, Alltwen (Phase 1)
Dep1346	Mr David Morgan		786184	Object	<p>As a family we have been residents of Lon Hir for the past 65 years, during such time have endured several development issues which have affected our lives with little or scant regard to any objections or suggestions made by us to the authority. We are confirming our objection to the proposed inclusion of this allocation in the LDP on the basis that it is ill conceived with a complete lack of consideration and thought for the safety of families living on Lon Hir, Edward Street and Brynmorgrug. Our objection are based on the following reasons :-</p> <p>We have been duly informed that the proposed development sits outside the current village boundary thus contravening current regulations, 2/3 of the development sits outside the current village boundary/village envelope therefore based on current Planning Policy this development should not be considered and therefore be refused.</p> <p>Access to Lon Hir from the roundabout at present is totally inadequate for the amount of traffic usage, this to the residents is patently obvious and is compounded when parents on the "school run" owing to the lack of parking spaces park on both sides of the street reducing the passage of traffic down to one lane. Surely planning to increase the traffic flow will cause additional dangers to the already dangerous situation that exists on the road and roundabout for all including pedestrians. This single access to what is an enclosed residential area is a major concern to us all, should an accident or an incident requiring the road to be closed then there</p>	H1/LB/30 Bryn Morgrug, Alltwen (Phase 1)

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					<p>would be no access or egress for residents or the emergency services. In view of the proposed development of the additional 150 houses (phase 3 current WDA industrial site which is already owned by Redrow must be included) then the probable increase in traffic volume could be around a further 300 cars plus service vehicles etc, surely this situation must be of concern to the authorities when they deliberate over allowing such a plan.</p> <p>When the consent was granted in 1972/74 for the original 100+ houses on the Bryn Morgrug site there existed two roads from the site via Edward Street and Lon Hir, this is no longer the case, now the roads from Brynmorgrug to Lon Hir being the only access and provides a totally substandard and dangerous facility for the residents of Brynmorgrug and Edward Street.</p> <p>The entire area is a cul de sac and planning and highways legislation relating to cul de sac access should be legally adopted.</p> <p>We strongly request that the authority refuse the planning permission for this development and insist that before any plans for further potential development, take time to reconsider a comprehensive revue of the whole area and include in their deliberations a separate access to either Graig Road or the A4067 below or both.</p> <p>It is our opinion that the authority should have insisted the developer constructs and finance new access ways to the new site. The authority in our opinion have not represented the needs of the residence in not insisting that the access ways have not been given due consideration.</p>	

PART 4: AMENDED SITES

ID	Full Name	Company / Organisation	Person ID	Object / Support	Title	Number	COMMENT
Dep27	Mr Stephen Hall		350649	Object	Green Wedges	Policy EN 3	<p>Green Wedge: Neath Road / Fairyland Road, Tonna</p> <p>I believe that the 'green wedge' between Neath, Cimla and Tonna needs to be preserved to maintain the separate identities of the settlements, to maintain the beauty of the Vale of Neath, and maintain the Open Space as per policy OS2.</p> <p>I am not convinced that the projection of 8000 extra housing units for the County Borough is realistic and that priority should be given to redeveloping brownfield sites and direct replacement of old housing stock rather than new build on green sites.</p> <p>I am not convinced that there is sufficient evidence to justify the construction of large numbers of new houses in areas that are currently open countryside within the County Borough under KI 5. The lack of economic growth identified under KI 3 and low levels of demand under KI 4 should mean that any growth can be accommodated within Brownfield sites under KI 14. The County Borough already has some of the least expensive housing in the UK, KI 6 can be addressed via small multi-story units within the town centre brownfield sites close to amenities and public transport.</p>
Dep270	Mrs Margaret Smith		784376	Object	Housing Sites	Policy H 1	<p>Dwr Y Felin Lower School, Longford</p> <p>Having recently seen the LDP on deposit for consultation, I feel aggrieved that my proposal for the development of the former Dwr y Felin Lower School site at Rhydhir has been overlooked and does not appear to have been given due consideration.</p> <p>As background information:</p> <ul style="list-style-type: none"> July 2010 - I submitted this as a candidate site for the provision of a much needed primary school; May 2011 - My proposal was not included, but the site was proposed for 70 new houses; August 2013 - My objections to the proposed 70 houses and still furthering the case for a new school have been merely "noted", and now 100 houses have been proposed. <p>I note that the LDP sets out plans for the future of the area by identifying what can be built and where. Whereas I can recognise the Council's need to identify provision for housing, the need for a new build primary school is paramount, there being no other suitable site available.</p> <p>I see this as a unique opportunity to earmark part of this site, at the very least, to provide a modern sustainable school fit for the education of our children in the twenty first century.</p> <p>The site affords an ideal opportunity to bring together Neath Abbey Infants' School (which is uniquely operating on split school sites at Rhyd Hir and New Road built 1828) and Mynachlog Nedd Junior School (St John's Terrace, built 1868).</p> <p>These early Victorian buildings and deteriorating additional demountable classrooms are expensive to repair and maintain. The last two hundred years have seen massive changes in education practice and it would be so much better for all the children to be taught together in sustainable new buildings, appropriately designed for modern times.</p> <p>There would also be ample room for safe recreational and play facilities.</p> <p>All primary school children could be together, no longer on three sites. As a result, there would be less traffic movement and the traffic jams on New Road caused by the two schools there would cease to exist.</p>

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							<p>How much better for the children to be on one safe site away from the busy main road in Neath Abbey with its associated traffic and pollution dangers.</p> <p>With the land still being used for education, there would be no major changes in developing the site for another school.</p> <p>It would not substantially affect people living nearby.</p> <p>To ensure that my arguments are given due consideration, I should be happy to speak at a hearing session. Meanwhile, I should be prepared to provide any further information as necessary.</p> <p>Please keep me informed of any further developments.</p>
Dep502	Mr R Lanchbury	Cilybebyll Community Council	196345	Object	Housing Sites	Policy H 1	<p>H1/28 Bryn Brych Farm, Rhos</p> <p>Council believes that the allocation of a site of 150 houses in Rhos will represent a 10% increase in the size of the settlement. It will generate significant pressure on the limited services which are currently available in the community, thereby adversely affecting its character. The only services provided in the village are in the form of a shop, a hairdressers and a pub, with the latter surviving in an increasingly volatile market. Community facilities include a park, playground and community centre owned by the Community Council, and which are in need of continuing investment to survive. The school is comparatively small, operating at 80% capacity already and would need further investment to accommodate any expansion through development within its catchment. Whilst other strategies, particularly the NPT Valleys Strategy and the NPT Community Strategy, stress the need for an integrated approach to community provision so that communities are sustainable, the imposition of 150 dwellings without comparable investment in facilities will unduly place the settlement under pressure. There does not appear to be any positive presumption in the Deposit Draft to address this deficiency in an integrated manner.</p> <p>Council also believes that there has been insufficient consideration of infrastructure and topography in the allocation of this site within the Deposit Plan, and that this will affect the wider local community and potentially render the development site undeliverable.</p> <p>Rhos has a long standing history of drainage issues, both in terms of surface water and foul water. There is experience of some curtilages flooding, culverts overflowing and of highways flooding. These have occurred in the immediate vicinity of the proposed site - existing development areas "downstream" in the immediate locality have suffered the consequences of flooding, and to the Council's understanding, this has not been resolved in a satisfactory manner. There is a widespread belief that this is attributable to the loss of natural drainage features and surfaces, and to the previously developed areas affecting surface water run-off, and that further development, particularly on higher ground, would exacerbate the problems. The same concerns are reflected in the potential for increased connections to the foul sewerage system serving the area.</p> <p>In highway terms, it appears that the site can be served from Plas Road and Maeslan, but both are residential streets and the latter has a "pinch point" and limited footways on the approach to its junction with Neath Road. There is often traffic congestion and delay on the A474 when accessing/egressing Plas Road in close proximity to dangerous bends and a pelican crossing. The other potential access mentioned is from the A474 Neath Road itself, opposite the School, where there is a junction with Heol y Nant, on a series of dangerous bends in the A474. This is an extremely fast and dangerous roads, with many properties directly accessed along its length, and lacking in footways at specific locations. It is difficult to understand how visibility and alignments in the approaches from both Neath and Pontardawe, even through the use of roundabouts and road loops, can be designed and funded in such a way as to meet acceptable highway standards. Such issues could render the site undeliverable.</p> <p>Rhos is a settlement that has seen considerable pressure for development since the 1960s and, where that pressure was acceded to, significant incursions into countryside areas have been allowed and changed the character of Rhos as a</p>

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							<p>result. The Bryn Brych site is good agricultural land that is regularly grazed, and the loss of productive land of this nature should not be encouraged in policy documents. In topographical terms, large parts of the proposed site rise up from the A474. The development would once again change the character of the settlement, and some construction would take place on higher ground that would be visible from the surrounding area, create potential run off onto lower ground, and potentially alter the ecological balance of the adjacent marshland.</p> <p>Council recognises that some provision for development may need to be accommodated in Rhos. For this reason, and notwithstanding the Council's concerns regarding highway and drainage infrastructure, local character and amenities, topography and ecology that would still need to be addressed, it considers that some limited development on the two fields fronting the A474 might be acceptable.</p>
Dep506	Mr D R Shopland	Dyffryn Clydach Community Council	196350	Object	Housing Sites	Policy H 1	<p>Dwr Y Felin Lower School, Longford</p> <p>The Community Council has asked that I write to you with regard to the proposed provision within the plan of an estimated 100 units of residential development on the site of the former Dwr y Felin (Lower) School at Longford, Neath Abbey Neath - (Document Section 5 -Para 5.1.10 Policy H1 Housing Sites).</p> <p>The Community Council strongly takes the view that, in the proposed development, sufficient land should be retained for a new Primary School to meet the needs of the area and to replace the existing Neath Abbey Infants School and Mynachlog Nedd Junior School both of which are located adjacent to the busy main road through Neath Abbey and Skewen. This matter has been previously raised with the Director of Education at the time of the announcement of the move of Dwr y Felin students back to the main site.</p>
Dep581	Mr Martin Davies	Swansea Canal Society	768521	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Trebanos Playing Fields to Pontardawe Town Centre</p> <p>1. Amendment Required: Change the wording of 5.5.22, 1(a) to:</p> <p>'In order to protect and conserve the canal network the following lengths of canal will be safeguarded:</p> <p>(a) The Swansea Canal at Trebanos from the County Borough Boundary to Pontardawe Town Centre.'</p> <p>The protection that was previously given to the 800 yard piped section of the Swansea Canal between the southern edge of the Pontardawe playing fields and Herbert Street, Pontardawe (as stated in the 2008 and 2011 Unitary Development Plan, POLICY RO6-CANALS, Part B) is to be removed in the current Deposit Plan.</p> <p>The blue line of the canal from the playing fields to Herbert Street has also been removed from Proposal Map 16. This should be replaced to tally with the above amended wording.</p> <p>REASONS FOR THE AMENDED WORDING:</p> <p>The removal of the protection from this piped section undermines the potential to recreate a fully restored, multi-purpose waterway between Ynysmeudwy and Clydach. This is in contradiction to the aims set out in the 2013 Deposit Plan, page 78, 5.5.24:</p> <p>'The policy seeks to protect the canals where appropriate, in particular in areas where development could compromise their use and future restoration. Remaining extant lengths of canal and lengths where there is a realistic prospect of restoration are safeguarded by the policy...'</p> <p>The continued protection of this piped section is vital to the vision of the restoration of the canal. It is all on land owned by Neath Port Talbot and no other buildings intrude onto the pedestrianised roadway covering the pipe until, as the Atkins Feasibility Study of May 2002 states, 'a pedestrian subway in the corner of the car park leads directly to the Pontardawe Aqueduct. The restored canal would have to negotiate the embankment carrying the link road to the A483.</p>

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							<p>While there is plenty of headroom, getting a straight alignment onto the aqueduct needs to be addressed'.</p> <p>The problems are still as stated by Atkins but the prospect of restoration is certainly 'realistic'.</p> <p>Richard Dommett who was the waterway engineer in charge when the section alongside the playing fields was filled in states that restoration of the canal was thought through even while this was being done. The pedestrianised subway under the A474 was actually built in order to take the restored canal.</p> <p>All these facts convince the Swansea Canal Society that restoration of this section is 'realistic' and therefore must be protected by the wording of 5.5.24.</p> <p>The Swansea Canal Society has made much progress, in partnership with Glyndwr Cymru and the Waterways Recovery Group, in maintaining and restoring the canal. The feasibility study on restoring the 150 yard piped link at the Old Highways Depot in Pontardawe Road, Clydach, is now reaching the discussion stage with Swansea Council and the Canal and River Trust.</p> <p>Every week volunteers from the SCS perform all manner of repair work on the canal. Members currently contribute an average of 1,000 hours per month to the canal restoration.</p> <p>Our week long camp with the Waterways Recovery Group and Glyndwr Cymru this September at the Trebanos Locks achieved much coverage in the local and National media. The WRG will be returning in 2014 to continue the restoration of the two locks.</p> <p>It is also noted that NPT's own Regeneration Team has also been investigating the removal of the obstruction to navigation caused by the low bridge at Holly Street.</p> <p>In summary, the removal of the protection of the canal route in the piped section from the playing fields to Herbert Street, Pontardawe would be to completely override the comments in the NPT Pre-Deposit Plan of 2011 which stated:-</p> <p>'The Swansea Canal restoration will be focused between Trebanos and Ynysmeudwy' (page 88).</p> <p>This volte-face will be a disincentive to all those who work towards a restored canal from Clydach to Ystalyfera.</p>
Dep660	Mr Terry Griffiths	NPT Ramblers Association	196299	Object	Housing Sites	Policy H 1	<p>Dwr Y Felin Lower School, Longford</p> <p>I wish to comment on housing policy H1/5 Dwr y Felin Lower School Site Longford. The need for a new infants and junior school on this site I believe to be indisputable. The present schools on the main road at Neath Abbey are well in excess of one hundred years old and are no longer fit for purpose with cramped conditions and insufficient recreational facilities. The proposal to build one hundred houses on this brownfield site is totally misguided and would leave an area with a lack of school places, an increase in traffic in a densely populated area and a problem of access by larger vehicles due to the restricted height of the railway bridge leading to the site.</p> <p>Additional traffic on Longford Road would also create tailbacks where the road joins Neath Abbey Road.</p> <p>I would wish in due course to appear before an inspector appointed by the Welsh Government to further discuss this matter.</p>
Dep736	Mr. John Smith	Neath Canal Navigation Company	787493	Object	The Canal Network	Policy BE 3	<p>Neath Canal: Ysgwrfa Bridge to Manor Drive</p> <p>In the absence of a regeneration strategy or any current meaningful dialogue concerning regeneration, that the line of the canal between Ysgwrfa Bridge and Manor Drive, because it is a vital requirement for any overall regeneration of the Neath canal and would create a meaningful northern terminus with associated economic benefits for Glynneath, should</p>

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							<p>thus be SAFEGUARDED.</p> <p>Historically the canal was supplied with water from the River Neath at its original terminus at Glynneath. A restored canal will continue to be dependent on an adequate water supply via the same route. The line of the canal - and presumably a culverted or piped water-supply – above Manor Drive is earmarked to be incorporated into the planned Park Avenue mixed-use regeneration scheme. In that regard, the canal company concurs with the view that restoration of the canal at this location is impracticable and has no objection to developments at Park Avenue providing the supply of water to the canal is protected.</p> <p>Below Manor Drive, the route of the canal occupies a green corridor alongside the B4242 to Ysgwrfa Bridge - which was lowered to improve the line of the (then) A465. It remains as a water-course including identifiable features such as lock chambers etc. The canal is otherwise crossed by the access road to Aberpergwm Colliery. The canal company notes that there are no competing demands for the line of the canal with the exception that the Proposals Map relating to Operational Coal Sites specifically includes the access bridge as such and seemingly not as a roadway.</p> <p>The Neath canal continues to be subject to a statutory right of navigation and the access bridge to the colliery forms part of a legal agreement relating to the potential for future reinstatement of navigation. Within the context of canal restoration and regeneration elsewhere in the UK, restoration of the canal from Ysgwrfa Bridge to Manor Drive is an eminently viable proposition. Indeed, restoration of the canal at this location would present less of a challenge than at other sites on the canals where lengths have been safeguarded.</p>
Dep746	Mr Graeme King		787594	Object	Development in Mineral Safeguarding Areas	Policy M 1	<p>Cwm Nant Lleici Quarry, Ynysmeudwy</p> <p>I have reviewed the Consultation document and in particular Section 5 The Topic Based Policies and would like to offer the following comments which apply to Policy SP17 Minerals and Policy M1 Development in Mineral Safeguarding Areas .</p> <p>The Plan recognises the requirement to supply crushed rock throughout the Plan period from the two existing quarries within the Authority's boundaries, including Cwm Nant Lleici Quarry near Pontardawe. Policy SP17 Minerals reiterates the fact that a balanced approach needs to be taken for the Authority to continue to make its contribution in meeting national, regional and local materials demands through balancing the impact which a development might have on the environment and community within which it is located.</p> <p>The existing extraction and processing area at Cwm Nant Lleici Quarry is shown verged blue on the attached plans. In 2008 planning to work mineral lying to the south in the area outlined in green was granted permission although to date this area remains unworked. Aggregate Industries is reviewing the longer term reserve and investment position required to secure quarrying throughout the Plan period and beyond at Cwm Nant Lleici.</p> <p>In this regard Aggregate Industries has identified an area contiguous to and west of its present operation at Cwm Nant Lleici which has been proven through drilling to be underlain by material of similar quality to that being worked. The area is estimated to contain of the order of 3 million tonnes of high quality grit stone and I have marked the area in red on the attached drawings. The location abutting the western boundary of the existing quarry will allow any material extracted to be transported back to the current processing plant and associated infrastructure. The area proposed would allow the continued backfilling of unsold material within the quarry (up to 40% of the total extracted material) without encroaching upon that part of the quarry through which free access will be required to develop the existing permitted reserves.</p> <p>Perhaps most importantly the area proposed would secure the existing level of permitted reserve at the quarry whilst remaining outside the 200 metre buffer zone (from Pant Gwyn Farmhouse) that currently constrains the existing permitted area. This is important for continued investment and security of quarrying throughout the Plan period.</p>

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							<p>Any application to work this mineral would first be subject to a scoping opinion request to identify all matters that would need to be addressed. Amongst these topics would be hydrology, ecology (especially upon the existing SSSIs), land quality and landscape impact. At this stage it is considered that any proposal could meet policy requirements for these topics.</p> <p>The Company therefore believes that the red area identified on the attached plans should be included in the emerging Local Development Plan as a mineral block of strategic importance as well as being safeguarded from any alternative forms of development which could prejudice the ability for extraction to occur in the future.</p>
Dep762		Pennant Walters Ltd	787646	Object	Criteria for the Assessment of Renewable and Low Carbon Energy Development	Policy RE 1	<p>Land at Maesgwyn, Glynneath</p> <p>The deposit LDP Proposals Map identifies so-called 'refined' Strategic Search Areas (SSAs) for SSA E Pontardawe and SSA F Coed Morgannwg, which are two of seven areas identified in national planning policy as areas where strategic, large scale, on-shore wind energy developments are "likely to be permitted": see Planning Policy Wales Edition 5 section 12.9 and TAN 8: Planning for Renewable Energy.</p> <p>In the case of both SSA E and SSA F, the refined boundaries are much smaller than those defined in TAN 8; indeed, in the case of SSA E, the refined area in Neath Port Talbot (NPT) is only a very small proportion of the TAN 8 SSA E and is largely occupied by the existing, operational Maesgwyn wind farm. Both PPW and TAN 8 envisaged that the seven SSAs would be 'refined', but not to the extent now proposed by the Council; see, for example:</p> <ul style="list-style-type: none"> • Paragraph 12.9.4 of PPW allows for "some local refinement" but says that "...it will be important to ensure that they do not differ significantly without local evidence from the indicative boundaries of the SSAs set out in TAN 8". • Each of the SSA maps in TAN 8 carries a note stating: "Boundaries may be <u>slightly</u> refined by Local Planning Authorities." (underlining added). • Paragraph 1.3 of Annex D of TAN 8 (which sets out a potential methodology for refining SSAs) states: "It is anticipated, however, that the Final TAN 8 will allow the local planning authorities to make <u>minor adjustments</u> to the SSA boundaries when translated into their local planning documents. This will facilitate the inclusion of development on the margins of SSAs where local conditions recommend." (underlining added). <p>It is evident that the Welsh Government, through national planning policy, never intended the kind of wholesale reduction now proposed by NPT for SSA E.</p> <p>The deposit LDP does not give the evidence base to substantiate the wholesale reduction in SSA E now proposed by NPT.</p> <p>Paragraph 5.3.94 of the deposit Written Statement gives the misleading impression that the refined SSA boundaries shown on the deposit LDP Proposals Map derive from the December 2006 TAN 8 Annex D study undertaken by Arup on behalf of a consortium of five local authorities in South Wales, including NPT. That is not the case. The Annex D study (Figure 11b) recommended in relation to SSA E that the refined area should be based on Zones 1, 2, 3, 4, 13, 14 and 16. Although substantially smaller than the TAN 8 SSA E, it is a much larger area than the refined boundary that NPT now proposes.</p> <p>Although it is not made clear in the deposit Written Statement, paragraph 6.0.5 of NPT's Renewable & Low Carbon Energy Topic Paper refers to additional work commissioned from Arup, but this time by NPT alone. This comprised the preparation of wireframes from a very limited number of viewpoints. Paragraph 6.0.5 states: "As a result the Authority resolved to amend the refined SSA boundary suggested by the Arup Study." In fact the Arup Wireframe Analysis (February 2007) made no recommendations at all.</p> <p>Although not stated in either the deposit Written Statement or the Topic Paper, the very small refined SSA E actually</p>

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							<p>originated in the Council's Interim Planning Guidance on Wind Turbine Development (undated), produced after the Neath Port Talbot UDP. Paragraph 6.1 of that document states that the Authority resolved to adopt the refined boundary following consideration of the Arup Annex D study, the additional wireframes and assessment of a planning application for a large windfarm between Seven Sisters and Glynneath (presumably the application for the now operational Maesgwyn wind farm). The objector (Pennant Walters Limited) proposes to extend this wind farm; the Council issued an EIA scoping opinion in May 2013 and a planning application is currently being worked up for submission in Spring 2014.</p> <p>Paragraph 5.3.95 of the deposit Written Statement asserts that the refined SSA boundaries represent "...the maximum potential for the development of large scale wind farms within the County Borough without creating unacceptable impacts on communities and the landscape..." Given that the local planning authority cannot have carried out the kind of detailed environmental impact assessment that would accompany a planning application for a wind farm, a statement such as that cannot be based on a full and proper consideration of the planning merits. Given the terms of Policy RE1, the statement is prejudicial to the outcome of any future planning application.</p> <p>TAN 8 (published in 2005) identifies the 'indicative capacity target' for each SSA - 100 MW for SSA E - and states (paragraph 2.5) that the targets "...are not to be seen as the definitive capacity for the areas" . Maximum capacities were calculated by Garrad Hassan, referred to in TAN 8 and confirmed more recently by the Minister for Environment and Sustainable Development in his letter of July 2011: 152 MW for SSA E. That letter also confirms the Welsh Government's continuing commitment to achieve the <u>maximum</u> capacities, which total 1700 MW of on-shore wind across all SSAs.</p> <p>Operational and consented on-shore wind developments in SSA E do not yet provide for the maximum capacity. (It should be noted that the figures given in Table 4.8 of the Council's Topic Paper are incorrect.) Operational and consented wind farms in SSA E total 108.5 MW (Maesgwyn 26 MW; Mynydd y Gwair 48 MW; Mynydd y Betws 34.5 MW), which is some way short of the maximum capacity of 152 MW. The Council has not demonstrated that the maximum capacity for SSA E can be met within the heavily reduced SSA it now proposes.</p> <p>The Council's proposals in respect of depicting the SSAs on the Proposals Map are unsound in that they fail soundness tests C2 (national policy) and CE2 (credible evidence base).</p> <p>POLICY RE1</p> <p>Policy RE1 sets the criteria for the assessment of proposals for renewable energy development. Changes are sought to three of the criteria:</p> <p>Criterion 1 :</p> <p>This criterion is unnecessarily restrictive, especially given the comments made above in relation to the Proposals Map and paragraphs 5.3.94-96.</p> <p>The ethos of the Welsh Government's policy on on-shore wind farms is that they should be concentrated into particular areas (the SSAs). It was never intended that the SSAs should be 'refined' to the extent now proposed by the Council. In NPT, the refined SSA proposed by the Council is largely taken up by the existing Maesgwyn wind farm and there is a limit to how many additional turbines can be built within that reduced area. Given that the LDP is supposed to provide guidance for the period to 2026, it cannot be sound or sustainable that it should be so restrictive. Paragraph 1.3 of TAN 8 Annex D recognised that one effect of SSA refinement would be to "...facilitate the inclusion of development on the margins of SSAs where local conditions recommend." This possibility would be foreclosed by adopting this criterion in its present form.</p> <p>This issue also arose in the case of the Bridgend LDP Policy ENV18. Initially, Bridgend County Borough Council</p>

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							<p>proposed to restrict wind farms of 25 MW or more to the refined SSA. The Inspector endorsed the Council's subsequently proposed change, which amended the equivalent criterion to read: "In the case of <u>wind farm developments of 25MW or more, the preference will be for them to be located</u> within the boundaries of the refined Strategic Search Areas."</p> <p>Criterion 2 :</p> <p>Many of the proposals considered under this policy will be subject to environmental impact assessment, as part of which it is common practice to consider what measures may be undertaken to mitigate or compensate for significant effects. This criterion should therefore be reworded as follows: "Measures can be taken to <u>avoid, reduce, mitigate or compensate for adverse effects on the environment and the amenity of neighbouring users</u> ."</p> <p>Criterion 3 :</p> <p>It may be argued that most forms of development compromise highway safety, as they generate additional traffic and may introduce new junctions on the existing highway network. As currently worded, this criterion sets an unreasonably high standard. In the interests of clarity, the criterion should therefore be reworded as follows: "It can be demonstrated that the development would not <u>have an unacceptable adverse effect on highway safety</u> ."</p> <p>The Council's proposals in respect of Policy RE1 fail soundness tests C2 (national policy) and CE4 (flexibility).</p>
Dep775	Mr Wayne Rees	Macob Property Holdings Ltd.	787696	Object	Employment Allocations	Policy EC 1	<p>Tyn-y-Caeau Farm, Margam</p> <p>The site being promoted at Tyn-y-Caeau Farm, Margam, is excluded from the Employment land (EC 1 /2) and Waste (W1 /1(b)) allocations. It therefore constitutes unallocated land which is contained by proposed uses on three sides and substantial route corridors to the east.</p> <p>In these representations we wish to promote the inclusion of the site as part of the adjacent employment and waste proposals.</p> <p>See attached Site Plan (Appendix 1) and Sustainability Appraisal (Appendix 2).</p> <p>The site is currently excluded from the adjacent employment and waste allocations and as a result the Deposit Plan lacks cohesion. There is a need to maximise the use of land as a resource and the omission of the site in question is unsound. If the site were identified as an extension of the proposed Employment (EC1 /2) and Waste (W1 /1 (b)) allocations, the sustainability credentials of the Plan would be improved.</p> <p>The Sustainability Appraisal attached shows 8 positive impacts, 5 neutral impacts with 0 negative impacts.</p> <p>See attached Sustainability Appraisal and Site Plan.</p>
Dep784		New County Leisure Ltd	336130	Object	Employment Allocations	Policy EC 1	<p>Junction 38, Margam</p> <p>Current Allocation in Unitary Development Plan</p> <p>Within the current adopted UDP the proposed alternative site forms part of the 27ha employment allocation EC1/14 for A2, B1, B2 and B8 uses. This allocation was similarly allocated in the preceding, unadopted, local plan.</p> <p>Deposit Local Development Plan</p> <p>Within the Deposit LDP Policy EC1 provides a list of employment allocations. Employment allocation EC1/2 (allocated for B1, B2 and B8 uses) comprises only a small proportion (6ha of the previous 27ha) of the previous UDP allocation</p>

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							<p>EC1/14.</p> <p>It is acknowledged in the supporting text to Policy EC1 that part of this allocation could meet the requirements of the Regional Waste Plan. It is also stated in paragraph 5.2.13 that the site benefits from excellent road transport links and is in close proximity to a number of existing employment allocations.</p> <p>Within the Deposit LDP - Employment Land Review (August 2013) background paper produced by the Authority, an assessment is provided of the existing UDP allocation. In summary it is noted that:</p> <ul style="list-style-type: none"> • The site is strategically located in terms of its position relative to the M4 and A48, and has no immediate constraints to development. • Although the site has limited accessibility by public transport it will benefit from the allocation of a Park and Share facility close to the site along the lay-by of the A48. • It is accepted that the development of the site for employment purposes would not negatively affect the neighbouring land uses. • That there are ecological constraints, and that any development would need to consider impacts on local biodiversity and drainage, in the form of appropriate mitigation. <p>It appears that the LPA have looked to justify the omission of the land not included within allocation EC1/2 (this land comprises a number of candidate sites, such as PT48 and PT54, which account for the majority of the land excluded) currently allocated for employment uses under the UDP on the basis of ecology.</p> <p>However within the LDP Candidate Sites assessment report (extracts attached in Appendix 1) it is actually recommended that candidate sites PT48 and PT54 should be allocated within the LDP for employment uses. This suggest that there is a degree of inconsistency in the overall assessment as to whether the UDP allocation should be 'rolled forward' into the LDP.</p> <p>In relation to the issue of ecology, at the recent CPO Inquiry dealing with PDR, there was significant debate regarding the level of ecological constraint to the development of the PDR. It was established as part of the Inquiry that the ecological value of the UDP employment allocation was not significant and would not be a fundamental constraint to development. The plan included (Appendix 2) was submitted to the Inquiry on behalf of the Authority. It confirms that invasive species (such as Japanese Knotweed) are present in the proposed alternative site, and in the subsequent period since this assessment was undertaken it is considered that the situation would have worsened.</p> <p>The proposed allocation within the Deposit LDP excludes the existing biomass plant located adjacent to the road (Heolcaer Bont) which runs along the eastern boundary of the site. It also excludes the extant planning permission (Planning Ref: P2008/1409 granted at appeal) for a further biomass fired power station to the north of the existing plant. Both of these sites are allocated for employment purposes within the current adopted UDP.</p> <p>Furthermore, again in terms of ecological issues, it is important to note that in the case of the biomass fired power station granted by appeal no issues of ecology were raised in the Inspector's report - a planning condition however was attached which required a prior to works commencing on site a programme of ecological mitigation to be agreed. This confirms that ecology matters were not considered to be fundamental constraints to the development of the land. In addition, based on the assessment within the Employment Land review report it is considered that any development proposals which came forward on the land which has been excluded from the LDP for employment uses could be adequately mitigated for.</p> <p>In terms of a further issue of relevance, the approval of this additional biomass plant provides access to the land to the rear of it, which includes the proposed extension to the allocation.</p> <p>As indicated within the supporting text to Policy EC1/2 there is the possibility that the proposed allocation has the</p>

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							<p>ability contribute to the regional waste plan - not least due to the existing and permitted biomass plants on the site. This is an important point, as it is entirely conceivable that the proposed enlarged employment allocation has the ability to act as a site for the relocation of Western Logs (their current site is proposed to be allocated in the LDP for housing under Policy H1/14). This scenario would result in the release of an allocated housing site and provide a direct operational link between the processes associate with the biomass plant(s).</p> <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan subject to these representations, and which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy EC1/2 - Amendment of the employment allocation to include all land currently allocated within the UDP. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness' - not least to acknowledge the benefits of additional employment opportunities that could be delivered through a larger allocation and to reflect the current and extant planning permission for both biomass plants. It is accepted that the site is strategically well located and ecology issues can be adequately mitigated through appropriately worded planning conditions attached to any approvals.</p> <p>Given the detailed nature of these representations our client would be happy to discuss any aspect of the submission made and credentials of the site when your Authority (and the appointed Inspector in turn) comes to evaluate matters.</p> <p>We respectfully urge, for the reasons given herein and in the associated submitted information / supporting material, to revise the strategy currently adopted by the Plan and make provision for the allocation of the employment site as allocated in the UDP.</p>
Dep907	Miss Bethan Jenkins AM		473974	Object	Coastal Corridor Regeneration Schemes	Policy CCRS 1	<p>Opposition to demolishing Neath Magistrates Court</p> <p>Proposals to move the court to Swansea with the closure of the court will have a major impact on all those on low incomes particularly people who live in the far flung valleys of NPT, not just in terms of the time it will take for them to reach the court, but also in terms of costs. It can take anything up to 2 hours to get from some parts of NPT to the court in Swansea despite what the separate consultation document as to the future of the Court quotes.</p> <p>There could have been many more options open to HMCtS to retain a court in NPT. An example would be that monies obtained from the sale of the court buildings could be used to improve the current Justices Centre in Port Talbot. Another one being the reuse of the Port Talbot Police Station as it already has cells, and it is not being currently.</p> <p>The moving of Neath Courts to Swansea will deny local justice to the people of NPT. The county must not be allowed to be considered as two or at most three towns. NPT is a very diverse area and it is not an urban conurbation which is well linked with public transport or even culture. What would a Swansea Magistrate know about the values of someone living in Dyffryn Cellwen or Banwen? The expertise available to the local Courts will be lost once the two benches merge and there is only one court to serve the whole population. NPT has already sacrificed the courts in Port Talbot and Pontardawe which closed in years gone by.</p>
Dep908	Miss Bethan Jenkins AM		473974	Object	Housing Sites	Policy H 1	<p>Dwr Y Felin Lower School, Longford</p> <p>Some residents have raised with us an issue regarding Longford, specifically the side of the former Dwr y Felin lower school. Some residents wrote to the council prior to this phase of the LDP suggesting there should be a new school built there to house the two primary schools currently on the main road through Neath Abbey, both of which are very old and not in the best place for children, on a busy main road. The residents feel, however, that the Council have disregarded their comments, and have put a plan for housing forward without considering other viable options.</p>

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Dep1239		Ryehill Properties (Wales) Ltd.	787653	Object	Housing Sites	Policy H 1	<p>Sarnfan Baglan Road, Baglan</p> <p>The Council should allocate additional housing sites to meet the housing requirement identified by the Welsh Government. Land at Sarnfan, Dinas Baglan Road, Baglan is considered to be a suitable site, being sustainability located within the settlement boundary of Baglan. Please see Alternative Site Representation for further information on the site. In addition, it should be noted that an outline application was submitted for 78 residential units at the site on 30th March 2012 (P2012/0352). A CD copy of the application documents is also enclosed for information which demonstrates that there is no constraint to the development of the site. The application documents include:</p> <ul style="list-style-type: none"> • Site Location Plan (LP-01); • Topographical Survey (5350C/500AO/1.1C); • Proposed Junction Arrangement, Cross Sections, Vehicle Swept Analysis and Footpath Schematic (Ref's: H1130, H1131, H1000, H1001, H1002, H1118) produced within the Transport Assessment; • Transport Assessment (Hyder, January 2012); • Design Calculations and Records in Support of Transport Assessment (Hyder, November 2011); • Phase 1 Environmental Survey (Merriman Ltd, March 2009); • Ecological Appraisal (CBE Consulting, July 2010); • Reptile Survey (CBE Consulting, July 2010); • Protected Species Survey (CBE Consulting, September 2010); • Tree Survey (CBE Consulting, November 2011); • Construction Methodology and Sequence Statement (HHB Construction Management Services Ltd, November 2011); • Privacy / Overlooking Assessment (Barton Willmore, March 2012); • Noise Assessment (Hunter Acoustics, March 2012); • Correspondence with Welsh Water (letters dated 29th May 2009 and 2nd June 2010 refer); • Flood Consequences Assessment (Hyder, January 2013); • Indicative Site Layout Plan (Hammond Architectural Ltd, May 2012); • Cross Sections (Hammond Architectural Ltd, May 2012); • Design and Access Statement (Barton Willmore, July 2012) and Supporting Photomontages (Anthony Jellard Associates, November 2011); and • Noise Assessment (Hunter Acoustics, June 2012). <p>The site should be allocated within the plan, given that it would make a logical extension to the adjacent allocation at Stycyllwen (H1/LB/15).</p>
Dep1244	Messrs James Bros.	Western Logs	318524	Object	Employment Allocations	Policy EC 1	<p>Land at Junction 38, Margam</p> <p>The land at junction 38 which was previously included in the UDP should be included as an employment allocation. The site has the benefit of a planning consent for a biomass power station which will potentially have spin off businesses in the location.</p>
Dep1258	Mrs Carolyn Wheeler		334555	Object	Coastal Corridor Regeneration Schemes	Policy CCRS 1	<p>Neath Magistrates Court, Neath</p> <p>I have read the LDP and wish to comment in particular on the proposed removal of Neath Magistrates' Court and the fact that no replacement is suggested, offered or insisted upon by the Council. Until 2 weeks ago a redesigned County Court/ Police Cells option was widely understood, I believe by the Council as well as local people, to be its replacement. HMCTS is now suggesting that Neath Magistrates' Court be merged with Swansea Court. This will significantly reduce the status of Neath town. There is now no court in either Port Talbot or Pontardawe. The status of the borough is being diminished by all of these losses.</p> <p>The plan states in 1.2.35 "The Single integrated Plan (SIP) sets out the Council's vision for NPT is to " Create a NPT</p>

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							<p>where everyone has an equal opportunity to be healthier, happier, safer and prosperous". Under Outcome 2 -Safer- "People in NPT feel safe and are safe. This outcome aims to improve people's safety through:</p> <p>"Reducing the impact of crime and the fear of crime"; "Reducing the incidence of Domestic Abuse"; "Reducing the numbers of young people involved in criminal behaviour"; "Reducing the harm of substance abuse".</p> <p>If we lose our court and the proposed down-grading of the Police station goes ahead in April 2014 then we will also lose the presence of the Probation Teams that currently deal with Drug and Alcohol Abuse and the results of Domestic Abuse. These will follow the court, which, it is proposed, will merge with Swansea Magistrates' Court. Everything will be based in Swansea.</p> <p>Also, under Key Issues 1.3.2. "There is a need to address dereliction and loss of character in settlements and urban centres". In K 3 "Economic growth in NPT has stagnated over the last 10 years. In the LDP Vision it states " Benefits from material resources will be maximised and the cultural, historic and natural heritage will be supported and enhanced".</p> <p>Overarching Objectives (OB) 23 "Respecting Distinctiveness" " protect and enhance the County Borough's historical heritage, built environment and identity"</p> <p>Strategic Policy (SP) 4 Infrastructure:</p> <p>"Developments will be expected to make efficient use of existing infrastructure and, where required, make adequate provision for new infrastructures, ensuring that there are no detrimental effects on the area and community".</p> <p>Where necessary Planning Obligations will be sought to ensure that the effects of developments are fully addressed in order to make the development acceptable. LDP Objectives OB3,)B4, OB7,OB10.</p> <p>3.0.24. Policy 11 Infrastructure Requirements</p> <p>"In addition to infrastructure improvements necessary to make a development acceptable in health, safety and amenity terms, additional works or funding may be required to ensure that , where appropriate, the impact of the new development is mitigated." Under 5.5.3. Historic Heritage " The town of Neath retains the character of a traditional market town 5.5.19. "Across the borough there are many examples of buildings that play an important part in the character of places but that do not merit inclusion in the statutory list of buildings of architectural or historic importance.</p> <p>No-one would claim, I think, that the 1977 building that is Neath Magistrates' Court has any particular architectural value except as an example of post-war functionalism, nevertheless its function is of vital importance to the historic market town that is Neath. While it is of great importance to redevelop Neath town centre as part of the LDP, it is also important that Neath not only "feels safe, and is safe" but that there is a visible manifestation of the rule of Law, and of law enforcement. This will, as it always has, re-assure the people of Neath and potential developers and new retail groups considering a move to Neath.</p> <p>If there is no criminal court in the town then the solicitors firms that currently deal with defendants will close down, further diminishing the opportunities for professional occupations for the young people of Neath.</p> <p>And if the new housing proposed in the LDP is built then there will be more people in the town. Where there are more</p>

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							<p>people there is more crime.</p> <p>The court also offers employment to local people and interacts with local shops and schools . If the council could support the relocation of a Magistrates' Court to a remodelled County Court/Police Station then those aspects of the LDP that relate to safety and identity would be satisfied.</p> <p>Letting the court slip away and be merged with Swansea would be like letting our status as a town be significantly down graded just when the LDP is seeking to regenerate and revitalise the borough.</p> <p>A town is more than shops and houses. NPT has lost the courts in Pontardawe, Port Talbot (replaced with a Tribunal Centre that has no cells). Police stations in Skewen, Port Talbot and Pontardawe are closed or only part functional. Everything is being lost to Swansea. Are we potentially turning NPT into a backwater area of Swansea?</p> <p>I wish to exclude the Magistrates' Court from the Regeneration Area.</p>
Dep1263	Mr Martin Davies	Swansea Canal Society	768521	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Gnoll Road to Woodmans Terrace</p> <p>2. Amendment required: Change the wording of 5.5.22 1(b) to:-</p> <p>'In order to protect and conserve the canal network the following lengths of canal will be safeguarded:-</p> <p>b) The Swansea Canal from Pontardawe Town Centre to the Twrch Aqueduct, Ystalyfera.</p> <p>Section 8 of the NPT Pre-Deposit Plan of 2011 (page 88) states that:-</p> <p>'The canal system will be promoted as a local and visitor resource. This will work towards providing an integrated Swansea Bay Waterway Network comprising the Neath, Tennant and Swansea Canals.'</p> <p>This is still the policy of Neath Port Talbot Council. Yet while all around the UK canals are seen as an economic and tourist asset the route of the Swansea Canal north of Godre'r Graig is being left to decay.</p> <p>Page 20 of the same Pre-Deposit plan states that 'the Canal Network is an important part of the County Borough's historic heritage. It forms part of a network of green corridors which encourages walking and cycling and attracts visitors to the area'.</p> <p>However, the condition of this 'historic heritage' on the canal route north of Godre'r Graig and the Swansea Canal Nature Reserve is deplorable. The land is owned by Neath Port Talbot and is the home to two CADW scheduled ancient monuments only a half mile north of the Nature Reserve.</p> <p>The Engine House of the Crimea Colliery which had direct access to the Swansea Canal is now obliterated by vegetation and is almost lost to the world. Lock 17 of the Swansea Canal (Thick's Lock), a complete lock which had a dry dock and ship building yard attached would be in a similar condition were it not for the work of the SCS and the Waterways Recovery Group who have managed to rescue it from the jungle.</p> <p>And these two remarkable heritage buildings are part of the canal network which Section 3 of the pre-deposit plan of 2011 describes as 'an important heritage feature and tourism asset'. At very little cost this section along the A4067 containing the remains of Locks 15, 16, 17, 18, 19 and 21, the high level canal in water above the new ASDA Store (another listed structure), and the remarkable Twrch Aqueduct (yet another listed building) would make a remarkable Heritage Trail leading to the Nature Reserve and the Canal in full water.</p> <p>The SCS hopes that when, in accordance with 5.5.21 of the 2013 Deposit Plan, an inventory of 'Buildings of Local</p>

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							<p>Importance' are compiled all these two hundred year old structures will be included.</p> <p>The Pre Deposit Plan of 2013 stresses on page 78, 5.5.25 that:-</p> <p>'The stretches of canal where restoration currently appears to be less likely, but may be feasible in the future, are also protected by the policy to ensure that new development does not cause any physical impediment'.</p> <p>One hopes that this sentence is adhered to and this previously protected line from Godre'r Graig to Ystalyfera Aqueduct does not suffer a similar fate to the east walls of Locks 15 and 16 which were used to build the foundations of the A4067 in 1972.</p>
Dep1265	Mrs Margaret Gwalter	Inland Waterways Association	588063	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Trebanos Playing Fields to Pontardawe Town Centre</p> <p>In view of the points made in 5.5.23, 5.5.24 and 5.5.25 why are not the remaining stretches of canal safeguarded as in the UDP. In particular why is the length from the southern edge of the playing fields to Pontardawe Town Centre, protected in earlier drafts of the document, not now safeguarded especially as in view of the gathering momentum for restoring the Swansea Canal and the relative ease of restoring this stretch, its restoration should be easily achieved within the lifetime of this LDP. Therefore the Association urges that the wording of 5.5.22 be altered to include protection for this stretch.</p> <p>Both Swansea and Neath Port Talbot Councils are in favour of the Integrated Waterway Project linking all three canals mentioned in 5.5.23 via the River Tawe and this section is a vital part of that plan. Failure to protect the lengths of canal as in the UDP may inadvertently lead to obliteration of some sections leading to the failure of this project.</p>
Dep1266	Mrs Margaret Gwalter	Inland Waterways Association	588063	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Gnoll Road to Woodmans Terrace</p> <p>The Association acknowledges that the upper reach of the Swansea Canal would be extremely costly and difficult to restore but it should be protected so as not to preclude its ultimate restoration as well as for its heritage value including some important structures, and for the supply of water to the lower reach where it is vital source of water to local industry.</p> <p>The tone of the policy implies that the canals are an obstacle which must be taken into account rather than the catalyst for regeneration that has been so successful in other places. In support of this the outcomes of the restoration of the Droitwich Canal restoration are appended.</p>
Dep1271	Dr Gareth Hughes	Neath and Tennant Canals Trust	211886	Object	The Canal Network	Policy BE 3	<p>Neath Canal: Ysgwrfa Bridge to Manor Drive</p> <p>The Neath and Tennant Canals Trust welcomes and fully supports the commitment in the LDP to protect and safeguard the canal network as defined in Policy BE 3 - The Canal Network, but strongly objects to the exclusion of sections of the canals, in particular the line of the Neath canal above Ysgwrfa Bridge, Aberpergwm.</p> <p>Attempts to engage NPT CBC over recent years in discussions relating to the development of the canals for tourism and recreation (1.1.11) have proved futile.</p> <p>The Trust is concerned that representations and objections made by various stake-holders and interested parties in response to the Draft LDP have been ignored.</p> <p>Following publication of the draft LDP the Trust prepared a discussion document entitled Beyond Restoration - Proposals for a Regeneration Strategy (appended below). Copies were distributed in February 2013 to stake-holders and interested parties, including members of the Cabinet, the Chief Executive and Head of Property and Regeneration of NPT CBC. To-date, no replies have been received from NPT CBC.</p> <p>Additionally, the Trust is informed that the document was not made available to those preparing the Deposit LDP with a</p>

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							<p>view to informing the process relating to Policy BE 3.</p> <p>The Policy statement - as reflected in Paragraphs 5.5.23 to 25 - consequently continues to perceive the development of the canals in terms of restoration rather than regeneration, and is informed accordingly.</p> <p>Reference in paragraph 5.5.23 to 'significant lengths of these canals have been restored to navigable standards', whilst historically correct, does not reflect the fact that restoration was undertaken on those two lengths of the Neath canal approaching 20 and 10 years ago. Given the failure to develop and provide boating facilities or a meaningful commitment to attract boaters, neither section post-restoration has or does offer 'opportunities for boating' (4.0.42). As a consequence, some restored structures are becoming derelict and un-navigable through disuse and neglect.</p> <p>The Trust regrets that Policy BE 3 does not promote the strategic regeneration of the canals but in relation to Implementation and Monitoring merely seeks to 'safeguard the canal network from inappropriate development'. If the canals are to realise their potential, the Trust is strongly of the opinion that the LDP should include a Strategic Policy to actively and urgently promote canal-based facilities and canal-side developments.</p> <p>In light of the above, the Trust believes the decision to exclude lengths of the canals from being safeguarded is flawed and should be reversed.</p> <p>Neath canal . The Trust wishes to re-iterate its response to the Draft LDP of the necessity to continue to safeguard a section of the line of the canal between Ysgwrfa Bridge and Manor Drive as a vital requirement for the overall regeneration of the Neath canal and the creation of a meaningful northern terminus with associated economic benefits for Glynneath (ref. 2.5.47).</p> <p>The Trust concurs with the view that restoration of the canal between Manor Drive and its former terminus at Glynneath is impracticable and has no objection to proposed developments at Park Avenue on the line of the canal provided the (? culverted/ piped) supply of water to the canal is protected.</p> <p>Below Manor Drive, the route of the canal occupies a green corridor alongside the B4242 to Ysgwrfa Bridge - which was lowered to improve the line of the (then) A465. It remains as a water-course and features such as lock chambers are identifiable. The canal is otherwise crossed by the access road to Aberpergwm Colliery. The Trust notes that there are no competing demands for the line of the canal with the exception that the Proposals Map relating to Operational Coal Sites specifically includes the access bridge as such and seemingly not as a roadway.</p> <p>The Neath canal continues to be subject to a statutory right of navigation and the access bridge to the colliery forms part of a legal agreement relating to the potential for future reinstatement of navigation. Within the context of canal restoration and regeneration elsewhere in the UK, restoration of the canal from Ysgwrfa Bridge to Manor Drive is an eminently viable proposition. Indeed, restoration of the canal at this location would present less of a challenge than at other sites where lengths are safeguarded.</p> <p>In the absence of an identifiable alternative location to create a suitable northern terminus for the canal below Ysgwrfa Bridge, the Trust believes that such a development at or near Manor Drive is an essential requirement for the development of the Neath canal, whilst '... extending the canal to the edge of the (Glynneath) town centre combined with a basin would provide a new focus for the town and contribute to its role as a gateway to the Brecon Beacons National Park'. (Bridge Economics, Economics Appraisal, 2008) (2.5.47 / 2.5.57). An internal report by the Head of Property and Regeneration of NPTCBC in 2009 (ECRB-080109-REP-EN-GN), based upon the Bridge Economics appraisal, concludes that 'so long as canal corridors continue to be protected in emerging local development plans, implementation of a solely Partial Scheme would also not preclude the future restoration of the remaining stretches of the canal system at a later date, subject to funding being secured or in the light of additional opportunities to generate economic benefits'. The length of canal between Ysgwrfa Bridge and Manor Drive is included in the Partial Scheme.</p>

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							On that basis, the Trust is of the opinion that this length of canal meets the criteria contained in 5.5.24, and if not, readily meets the criteria in 5.5.25 - and should be safeguarded.
Dep1272	Dr Gareth Hughes	Neath and Tennant Canals Trust	211886	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Trebanos Playing Fields to Pontardawe Town Centre</p> <p>The Trust notes also that a section of the Swansea canal between Trebanos and Pontardawe, which was safeguarded in the Draft LDP, is excluded in Policy BE 3 - a decision which is difficult to comprehend given that it would preclude the creation of a unified Swansea canal or the proposed 35-mile integrated waterway scheme involving all three canals via the SA1 development in Swansea. Moreover it will have the effect of isolating and disadvantaging Pontardawe and the northern section of the canal.</p> <p>The proposals maps indicate that this length of canal has no competing interests, and in the absence of locks or significant impediments to restoration, would appear to meet the criteria of 5.5.24 or else 5.5.25. and should be safeguarded.</p>
Dep1274	Mrs Jane Hennell	Canal and River Trust	376324	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Trebanos Playing Fields to Pontardawe Town Centre</p> <p>The Trust notes also that a section of the Swansea canal between Trebanos and Pontardawe , which was safeguarded in the Draft LDP, is excluded in Policy BE 3. This omission may preclude the creation of a unified Swansea canal or the proposed 35-mile integrated waterway scheme involving all three canals via the SA1 development in Swansea. Moreover it will have the effect of isolating and disadvantaging Pontardawe and the northern section of the canal.</p> <p>We wrote to the Council in 2011 advocating the continuing protection of the entire route of the Swansea canal however, the Council responded that the Strategy recognises and acknowledges the financial and practical difficulties of restoring the portion of the canal route. The policies & proposals in the LDP have to be deliverable, realistic and 'sound'.</p> <p>The Trust believe the decision to omit this section fails the test of soundness under section CE2 in that the policy is not appropriate as it has not considered the relevant alternatives and is not founded on a robust and credible evidence base.</p> <p>In addition the policy also fails test CE4 in that the omission of any section of canal does not allow flexibility to reflect changing circumstances. Indeed the omission of these sections will only serve to impede the likelihood of the canal restoration, thus possibly preventing restoration even when changes occur such as redevelopment opportunities or funding bids.</p> <p>Other canal restoration projects have overcome similar issues and constraints. It is vital that the aspiration to complete the restoration project is not only included in the Development Plan but that the benefits of providing the full canal is fully recognised and promoted elsewhere such as the Council Economic Development Strategies and Green Infrastructure policies.</p> <p>At paragraph 5.5.24 the council seeks to protect the canals where appropriate, in particular in areas where development could compromise their use and future restoration. Remaining extant lengths of canal and lengths where there is a realistic prospect of restoration are safeguarded by the policy thereby ensuring that they are not adversely affected by future development. Such lengths of canal are identified on the Proposals Map.</p> <p>At 5.5.25 the stretches of canal where restoration currently appears to be less likely, but may be feasible in the future, are also protected by the policy to ensure that new development does not cause any physical impediment.</p> <p>By implication therefore the section not protected is not considered deliverable during the plan period however there is little evidence given to justify on what basis this assumption is made. The proposals maps indicate that this length of canal has no competing interests, and in the absence of locks or significant impediments to restoration, would appear to meet the criteria used by the Council in determining which stretches are to be safeguarded.</p>

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							<p>Throughout the document there is evidence of the Councils recognition of the benefits and importance of the canals and therefore as policy which may prevent the full restoration, with all the regeneration benefits that may bring, appears both incongruous and inconsistent. While the restoration of the canal to full navigation may be a distant aspiration it is achievable. Most Canal restoration projects have faced similar issues in the past. Waterways have played a role in regenerating existing urban areas, with successful examples including the revitalising of areas within Manchester, Birmingham, and Sheffield. By providing an attractive environment and an interesting backdrop, waterfronts, whether canals or rivers, can draw in residents and visitors. In addition, the construction of the Waterway will itself help support employment.</p> <p>Current restoration projects such as the Cotswold Canals in Gloucestershire and the Wilts and Berks Canal face similar issues in that parts of their original route have been in-filled, re-developed or blocked by other major infrastructure such as railway lines and even motorways. These problems have been encountered and overcome by most canal regeneration projects in the country. The full restoration of the Swansea Canal is possible and should not be written off by the Council, its restoration is entirely possible through partnership working. To achieve this it is crucial that the opportunity to provide the remaining missing stretch remains an option. Without this further investment in the canal is less likely and may well result in the degradation of the existing stretches of canal.</p> <p>It is vital that the aspiration to complete the project is not only included in the Development Plan but that the benefits of providing the full canal is fully recognised and promoted elsewhere such as the Council Economic Development Strategies and Green Infrastructure policies.</p> <p>The Trust believes that increasing the size of the navigable waterway network for public benefit is one of our key charitable purposes. A fully restored Canal network in South Wales would bring back into use a valuable local heritage asset for the benefit of local communities and the economy. The restored canal network would also form an important part of the area's Green Infrastructure and act as a sustainable transport network, both important aspects of the emerging LDP.</p>
Dep1281	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Trebanos Playing Fields to Pontardawe Town Centre</p> <p>Swansea Community Boat Trust is a registered charity. The Charitable Objects include the possibility of operating canal boats in Neath Port Talbot, as well as Swansea, and making local people more aware of the natural and industrial heritage of the waterways.</p> <p>By the end of its second full operating season, the Swansea Community Boat will have carried 19,000 passengers from Swansea Marina to Morfa. A new purpose-built vessel has been commissioned for the 2014 season, for use on the Tawe river navigation. Discussions are taking place with Swansea Council with a view to installing a landing stage at Morfa.</p> <p>The Trust has an interest in the creation of an integrated waterways system in the Neath and Swansea valleys, as this would facilitate a possible extension of its boating operations across the Swansea Bay City region.</p> <p>Response to Policy BE3 'The Canal Network'.</p> <p>Although it is encouraging to see the Neath, Tennant and Swansea canals designated as "The Canal Network", Policy BE3 is inconsistent and lacks an overarching strategic vision.</p> <p>5.5.22 1). The Neath Canal is safeguarded from Briton Ferry to Ysgwrfa Bridge, Aberpergwm, without mention of the infilled section at Abergarwed. We agree with this, though we make additional comment in section 2 below that the safeguarded Neath Canal route should be extended to Glynneath.</p>

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							<p>The Swansea Canal is treated differently and is listed as 2 separate portions, with the connecting culverted section south of Pontardawe not included.</p> <p>To be consistent, the LDP should merge paragraphs (a) & (b). Revise the wording of the combined paragraph : "The Swansea Canal from Trebanos to Godre'r Graig".</p> <p>In view of its strategic importance if the Swansea Canal is to be restored as a continuous waterspace between Clydach and Pontardawe town centres and beyond, the culverted section south of Pontardawe must also be designated on the Proposals Map as "A Safeguarded Canal Route BE3".</p>
Dep1285	Mr John Andrew Davies	Swansea Community Boat Trust	789755	Object	The Canal Network	Policy BE 3	<p>Neath Canal: Ysgwrfa Bridge to Manor Drive</p> <p>The considerable value of the disused section of the Neath Canal between Ysgwrfa Bridge and Glynneath should be recognised in the LDP, primarily because of:</p> <ul style="list-style-type: none"> • The strategic significance of creating a "destination" and the economic benefits that this would bring to Glynneath; • The need to reinstate the water feeder to ensure adequate water levels and the operation of locks on the upper Neath Canal; • The opportunity to investigate using the upper Neath Canal as a SuDS. <p>Revise the wording of paragraph (d) : "The Neath Canal from Briton Ferry to Glynneath".</p>
Dep1292	Mr Ben Cook	St. Modwen Developments Ltd	787655	Object	Employment Allocations	Policy EC 1	<p>Baglan Energy Park</p> <p>Whilst EC1 allocates an amount of land for B class uses at Baglan Bay, the description of the site and its potential in paragraphs 5.2.8 to 5.2.12 explain the approach that will be adopted to development proposals there. This recognises that because of its size, condition, position and capacity, Baglan Bay has potential to capture or tackle a full range of challenges and opportunities. These could be directed at specific sectors or a broad spectrum of economic activity or sectors, and provide space and land for the very largest requirement or the very smallest. As paragraph 5.2.11 of the DLDP recognises, the site can capture very large and mobile investment projects including energy generation and data and technology schemes in emerging sectors.</p> <p>Policy EC1 formalises this position. It acknowledges that part of the Baglan Bay allocation could meet the requirements of the Regional Waste Plan and refers to it as a preferred site for In Building Waste Treatment Facilities. The development of energy generation projects is also supported.</p> <p>Policies EC2 and EC3 make similar provision for the safeguarded area of Baglan Bay.</p> <p>Regeneration at Baglan Bay is already underway through a number of initiatives. To the east of the site is Baglan Energy Park which includes modern manufacturing units, office space and the combined-cycle gas turbine power plant. Planning permission is also in place for a second power station and further to the west development of the sites first renewable scheme (a PV array) has recently begun. These schemes show that the legacy of previous uses can be dealt with and the land can be successfully redeveloped.</p> <p>The remainder (and clear majority) of Baglan Bay is vacant and cleared. This area is already served by water, sewerage, electricity, gas and telecommunications services with the Energy Park and power plant having the full range of services need to undertake its operations. The existing site infrastructure networks are likely to provide significant capacity for new uses. Access to the strategic and local highway network is excellent (and will improve) and the site is well placed for improved public transport links.</p>

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							<p>There has also been recent interest in the site from energy generators and business occupiers. This is indicative that schemes can be implemented quickly and affordably on the site. In part this responds to SMDL's continued programme of remediation. However it is also a result of SMDL's control over the site and its experience in practical regeneration.</p> <p>SMDL has completed a development framework for Baglan Bay which organises uses on the site and subdivides it into a number of zones or phases. This shows that:</p> <ul style="list-style-type: none"> a) a full range of activities can be located there b) small units and schemes can be built as well as very large and largely unconstrained buildings c) existing access and infrastructure networks need not change to achieve this d) there is scope for civic uses and activities with special or specific characteristics as well as more conventional occupiers e) there is also scope for a locally significant area of housing on the southern parts of the site, together with some softer community uses. <p>The framework has been tested from a technical and environmental perspective and will form the context for the planning applications that will come forward at Baglan. Interest has already been expressed in a range of activities extending from renewable energy generation to a small number of more conventional office uses.</p> <p><i>Development Potential</i></p> <p>As indicated above, the site has potential to accommodate all key economic sectors and lends itself to a complete range of companies. This has driven a sectoral approach at a site wide and strategic level, which seeks to respond to the policy and vision for the area and the most recent assessment of economic conditions and potential. The proposed approach is flexible and allows a focus on one or two sectors whilst not limiting business and economic activity across the whole spectrum. This is considered the most appropriate blend of commercial potential and strategic aspiration.</p> <p>This concept has informed a refinement of the zoned approach which underpins previous masterplans and sees the site broadly (and not precisely) organised into four main areas. These focus on:</p> <ul style="list-style-type: none"> a) business and innovation, clustered around the existing energy park b) advanced manufacturing, construction and logistics which has the potential to connect to the new Swansea University Bay Campus (and other local initiatives) c) energy and green technology d) civic activities and facilities (based on known requirements) <p><i>Phasing</i></p> <p>Early delivery of part of the site continues at Baglan Energy Park and the solar park which is currently being built. Recent interest in the site from energy generators and other occupiers indicates that these schemes can, and will be, implemented as the plan period progresses. Some of these will take considerable areas of the site for single projects. The presence of existing and substantial infrastructure will be a key benefit, and the fact that the land is already cleared and is unoccupied means that any new activity is likely to be new rather than displaced.</p> <p>As a result of the on-going programme of remediation works across the site (in terms of investigation, remediation and monitoring), ground conditions present no fundamental constraint to the way in which development will progress. This has recently been demonstrated with the approval and start of the PV array in the western part of the site.</p>

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							<p>Outputs and Delivery</p> <p><i>Sustainability</i></p> <p>The site is a clearly a sustainable location for new economic activity. It is well located and consists of wholly previously developed land. New development has the potential to provide a final and positive solution that deals with the legacy of past use and improves environmental appearance and performance. It can also attract users, sectors and activities which are sustainable or which improve the efficiency of resource production, consumption and reuse.</p> <p><i>Economic Contribution</i></p> <p>Baglan Bay will make a major contribution to the economic potential and performance of Neath Port Talbot and Swansea Bay. The sector approach suggests that may be as much about activity and support as it will be about new job generation. It is also like to take place within the plan period and beyond. Seen like this Baglan Bay is a significant and important initiative even if it warrants a slightly unconventional approach to forward planning exercises like the LDP (which are area based and time managed).</p> <p>The number of new jobs that could be created is significant. With the sector approach this might not be as high as the land areas suggest (simply because some of the sectors are not as labour intensive). However, development in these sectors will still support local and national objectives and the delivery of important targets. This underscores the importance of Baglan Bay which sits in an area that needs new jobs and can connect (and become part of) a series of initiatives which have local, regional and national potential.</p> <p>It is equally important to recognise that Baglan has the (unique) potential to accommodate very large projects or those with specific requirements for secure power or high levels of security. In addition, because of its combination of size, strategic position and lack of constraint, is can attract and deliver mobile projects, those associated with logistics and data processing and management and those which may be considered bad neighbours in other locations. As stated above, this may mean that headline job generation is low, but this also means that these often essential parts of an areas (or city regions) economic and civic infrastructure can be delivered in a way which leaves other more conventional sites to deliver other more conventional forms of economic development.</p> <p><i>Market and Commercial Potential</i></p> <p>There are challenges to the delivery of economic growth - and these are serious, significant and concern matters that are outside of local and probably national control or influence. As a result, interest and take up has been low and, without intervention, it is very difficult to predict when and how conditions will change.</p> <p>However, as well as the sectors already referred to, there is also clear potential for a series of target sectors and initiatives to be attracted to NPT or to start business there. Baglan provides an ideal location to support these initiatives. In terms of the WG identified sectors, the 'Advanced Manufacturing and Materials' and 'Life Sciences' are obvious potential candidates, given the site's location and proximity to Swansea University and the new campus on Fabian Way.</p> <p>Baglan is very well placed to capture and accelerate interest in the new Campus. It can also build on a number of other current and proposed initiatives including Glamorgan University's existing research facility and Neath Port Talbot College's School of Construction and Built Environment. Links to significant local employers and to the neighbouring Coed Darcy project are also possible either because of proximity or because of other strong connections.</p> <p>Baglan can clearly accommodate more conventional requirements (and already has a track record in doing this). There are a number of firms on the site and the area regularly features on the list of sites for potential requirements across the economic development spectrum (from offices to factories and warehouses to civic uses and activities). As stated a number of times already, the area is also clearly attractive to the energy sector - with power stations and renewable (PV)</p>

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							<p>schemes either there or proposed.</p> <p>The site can deliver a range of projects and activities of all sizes and types - and has special characteristics which make it suitable for activities which may be difficult to accommodate elsewhere. This can be done sustainably on previously developed land that lies in a locally and regionally accessible location.</p> <p>The DLDP signals the scale and potential of Baglan Bay and recognises that it will be a suitable and available location for a variety of uses and activities. Some of these will be quantifiable and it sends an amount of new development to Baglan Bay that helps with the plans land delivery targets. Elsewhere, it safeguards an existing area for other economic activity. This appears to be - in part - a response to comments from the Welsh Government about the amount of employment land that the plan allocates. So long as it does not block the regeneration of Baglan Bay over the plan period (and no party is suggesting it will) then the approach is sound and can be supported.</p> <p>However, if the intention with the plan's policies is to control the pace and type of development or to exclude any activity beyond the allocated or safeguarded areas (especially to the west), then we recommend that policy for Baglan Bay returns to the approach set out in the UDP (and the broad area it covers) . This would avoid any misunderstanding and allow Baglan Bay to be used for activities that would make the best use of the (previously developed) condition of the site, its local and strategic accessibility and the absence of constraints (for often constrained or demanding uses).</p>
Dep1300	Mr Clive Reed	Swansea Valley Heritage	706760	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Trebanos Playing Fields to Pontardawe Town Centre</p> <p>Canals Network – Environment Topic Paper 25. This section contains the following statements; 6.1.5 whilst the canal network is not central to the future development of the County Borough, it will nevertheless be important to protect and enhance the canal network and encourage its restoration. 6.1.7 the LDP will need to include a policy which seeks to protect the canals where appropriate, in particular areas where development could compromise their use and future restoration. A distinction will however need to be made between safeguarding the lengths of the canal network where there is a realistic prospect of restoration, and those stretches of canal where restoration will be less likely.</p> <p>The two statements above appear to only protect the Neath Canal and the Tenant Canal, with no support for the Swansea Canal. Does the statement 6.1.5 protect the Swansea Canal corridor through Ynysderw Fields and north of Ynysmeudwy? If not then it must be protected so in the future it can be restored so there can be navigation from Swansea to Ystalyfera. In the former LVBC Local Plan, The Swansea Canal corridor was protected from Ystalyfera to Clydach, and with the City and County of Swansea protecting a corridor within its boundary for the canal reinstatement.</p> <p>The Neath Canal is in an advantageous position because of the support and the money spent on it by the former Neath Borough Council from 1974 onwards and continuing support from NPTCBC. The Swansea Canal did not receive such support and still does not at the present time. I wish to see the whole Swansea Canal corridor from Ystalyfera to the NPTCBC boundary above Clydach receive proper protection from any adverse development.</p> <p>Environment Topic Paper 25 states that the Swansea Canal is filled in between Trebanos and Pontardawe 4.1.12 with two low bridges in Pontardawe and that the canal is lost to the new road between Godre'r Graig and Ystalyfera. The Swansea Canal does exist between Godre'r Graig and Ystalyfera, but in a much reduced form. The canal is narrowed and set within a concrete channel six feet wide. Sections of the Neath Canal were in a similar situation 30 years ago, but have since been restored. May I point out that the W.S. Atkins Feasibility Report 2003 The Restoration of the Neath, Tennant and Swansea Canals which gives solutions to removing all obstructions to reinstating the canal at those locations. I want to see NPTCBC support the aspirations of the Swansea Canal Society in its aims of restoring the Swansea Canal to navigation. The 35 mile long Regional Waterways lost its impetus when British Waterways, who were the lead body, changed their management structure that removed the leadership from the project. No work has commenced on restoring the Tenant Canal, with many parts of it difficult for the public to access (other than walk on the Aberdulais Aqueduct) whilst the Swansea Canal made positive restoration with the volunteers dredging several</p>

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							miles of the canal and restoring all bridges crossing the canal. The Ystalyfera Aqueduct was restored as a partnership project between the L/A's and the volunteer sector. A heritage centre was built at Clydach, the canal society re-laid five miles of canal towpath, restored the only remaining lock-keepers dwelling at Ynysmeudwy, and built and operated a trip boat at Pontardawe. That was all positive restoration work. At the present time a team of volunteers from the Swansea Canal Society make a huge contribution to the daily repairs along the Swansea Canal, assisting the owners (the Government) by repairing and maintaining masonry structures along the canal and maintaining and painting all safety railings. I reiterate, I want to see a more positive attitude from NPTCBC toward the restoration of the Swansea Canal.
Dep1301	Mr Clive Reed	Swansea Valley Heritage	706760	Object	The Canal Network	Policy BE 3	<p>Swansea Canal: Gnoll Road to Woodmans Terrace</p> <p>Canals Network – Environment Topic Paper 25. This section contains the following statements; 6.1.5 whilst the canal network is not central to the future development of the County Borough, it will nevertheless be important to protect and enhance the canal network and encourage its restoration. 6.1.7 the LDP will need to include a policy which seeks to protect the canals where appropriate, in particular areas where development could compromise their use and future restoration. A distinction will however need to be made between safeguarding the lengths of the canal network where there is a realistic prospect of restoration, and those stretches of canal where restoration will be less likely.</p> <p>The two statements above appear to only protect the Neath Canal and the Tenant Canal, with no support for the Swansea Canal. Does the statement 6.1.5 protect the Swansea Canal corridor through Ynysderw Fields and north of Ynysmeudwy? If not then it must be protected so in the future it can be restored so there can be navigation from Swansea to Ystalyfera. In the former LVBC Local Plan, The Swansea Canal corridor was protected from Ystalyfera to Clydach, and with the City and County of Swansea protecting a corridor within its boundary for the canal reinstatement.</p> <p>The Neath Canal is in an advantageous position because of the support and the money spent on it by the former Neath Borough Council from 1974 onwards and continuing support from NPTCBC. The Swansea Canal did not receive such support and still does not at the present time. I wish to see the whole Swansea Canal corridor from Ystalyfera to the NPTCBC boundary above Clydach receive proper protection from any adverse development.</p> <p>Environment Topic Paper 25 states that the Swansea Canal is filled in between Trebanos and Pontardawe 4.1.12 with two low bridges in Pontardawe and that the canal is lost to the new road between Godre'r Graig and Ystalyfera. The Swansea Canal does exist between Godre'r Graig and Ystalyfera, but in a much reduced form. The canal is narrowed and set within a concrete channel six feet wide. Sections of the Neath Canal were in a similar situation 30 years ago, but have since been restored. May I point out that the W.S. Atkins Feasibility Report 2003 The Restoration of the Neath, Tennant and Swansea Canals which gives solutions to removing all obstructions to reinstating the canal at those locations. I want to see NPTCBC support the aspirations of the Swansea Canal Society in its aims of restoring the Swansea Canal to navigation. The 35 mile long Regional Waterways lost its impetus when British Waterways, who were the lead body, changed their management structure that removed the leadership from the project. No work has commenced on restoring the Tenant Canal, with many parts of it difficult for the public to access (other than walk on the Aberdulais Aqueduct) whilst the Swansea Canal made positive restoration with the volunteers dredging several miles of the canal and restoring all bridges crossing the canal. The Ystalyfera Aqueduct was restored as a partnership project between the L/A's and the volunteer sector. A heritage centre was built at Clydach, the canal society re-laid five miles of canal towpath, restored the only remaining lock-keepers dwelling at Ynysmeudwy, and built and operated a trip boat at Pontardawe. That was all positive restoration work. At the present time a team of volunteers from the Swansea Canal Society make a huge contribution to the daily repairs along the Swansea Canal, assisting the owners (the Government) by repairing and maintaining masonry structures along the canal and maintaining and painting all safety railings. I reiterate, I want to see a more positive attitude from NPTCBC toward the restoration of the Swansea Canal.</p>
Dep1330		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Special Landscape Areas	Policy EN 2	<p>Special Landscape Area: Land at Coed Hirwaun, Margam Village (Option 1)</p> <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our</p>

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							<p>detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site.

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							<ul style="list-style-type: none"> The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff).</p> <p>In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p>

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							<p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>The proposed Development Framework Plan for Option 1 (see Appendix 5) proposes an indicative development of approximately 490 dwellings, and is the preferred alternative site. The level of development proposed has been defined in consideration of the landscape setting, as well as seeking to ensure that sufficient numbers are present to support a wider variety of community and other facilities.</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p>

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							<p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which</p>

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							<p>development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have '<i>no adverse impact on the features and characteristics for which the SLA has been designated</i>' and it would not undermine the purpose and '<i>integrity of the green wedge</i>'.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p> <p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the</p>

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							<p>proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p> <p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development;

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							<ul style="list-style-type: none"> • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates. <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding;

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							<ul style="list-style-type: none"> • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p>

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							<ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs. <p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings. <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun,

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							in order to allow for the allocation of the proposed alternative site. It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.
Dep1331		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Green Wedges	Policy EN 3	<p>Green Wedge: Land at Coed Hirwaun, Margam Village (Option 1)</p> <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which

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							<p>should be allocated within the Plan.</p> <ul style="list-style-type: none"> • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff).</p> <p>In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p>

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							<p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p> <p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>The proposed Development Framework Plan for Option 1 (see Appendix 5) proposes an indicative development of approximately 490 dwellings, and is the preferred alternative site. The level of development proposed has been defined in consideration of the landscape setting, as well as seeking to ensure that sufficient numbers are present to support a wider variety of community and other facilities.</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p>

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							<p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p>

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							<p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have '<i>no adverse impact on the features and characteristics for which the SLA has been designated</i>' and it would not undermine the purpose and '<i>integrity of the green wedge</i>'.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p> <p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p>

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							<p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p> <p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting</p>

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							<p>Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates. <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and</p>

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							<p>the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p>

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							<p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs. <p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings. <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision

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							<p>for windfall sites.</p> <ul style="list-style-type: none"> • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep1333		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Special Landscape Areas	Policy EN 2	<p>Special Landscape Area: Land at Coed Hirwaun, Margam (Option 2)</p> <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites.

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							<ul style="list-style-type: none"> • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff).</p> <p>In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following</p>

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							<p>services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p> <p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>As an alternative, secondary option, the proposed Development Framework Plan for Option 2 (see Appendix 6) proposes an indicative development of approximately 300 dwellings. This site area could also be considered as the first phase of the wider development site (i.e. Option 1).</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot;

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							<ul style="list-style-type: none"> • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive</p>

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							<p>design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have '<i>no adverse impact on the features and characteristics for which the SLA has been designated</i>' and it would not undermine the purpose and '<i>integrity of the green wedge</i>'. </p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p> <p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries,</p>

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							<p>which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p>

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							<p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p> <p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates. <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for</p>

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							<p>the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p>

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							<p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs. <p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings.

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							<p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep1334		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	Green Wedges	Policy EN 3	<p>Green Wedge: Land at Coed Hirwaun, Margam (Option 2)</p> <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required.

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							<ul style="list-style-type: none"> • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space

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							<p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff).</p> <p>In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p> <p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>As an alternative, secondary option, the proposed Development Framework Plan for Option 2 (see Appendix 6) proposes an indicative development of approximately 300 dwellings. This site area could also be considered as the first phase of the wider development site (i.e. Option 1).</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p>

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							<p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives</p>

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							<p>consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have ' <i>no adverse impact on the features and characteristics for which the SLA has been designated</i>' and <i>it would not undermine the purpose and integrity of the green wedge</i> '.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p>

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							<p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p> <p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port</p>

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							<p>Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p> <p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates.

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							<p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all</p>

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							<p>residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network. • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs.

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							<p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings. <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep1378	Mr Stephen Thomas	The Huggard Charitable Trust	704857	Object	Green Wedges	Policy EN 3	<p>Green Wedge: Bryncoch Farm</p> <p>Bryncoch Farm was approved by the Planning Inspectorate during the UDP process for inclusion in the settlement area, so I object to it being maintained in the Green Wedge. Considerate development of the site would benefit the community with no adverse effect.</p>

PART 5: AMENDED SETTLEMENT LIMITS

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT
Dep204	Mr Kevin Doherty		751099	Object	<p>Corner of Tan Y Bryn Terrace, Evandale, Cwmgrach, SA11 5PU</p> <p>Further to my original correspondence for this site under the LDP review process of 8th April 2013, I hereby submit a revised argument as part of the LDP process to include what I consider to be a small 'left-over' site into the settlement envelope around Glynneath. This letter acts as the addendum or technical back up to Tables 1 & 2 and the Deposit LDP Representation Form attached.</p> <p>Site Location</p> <p>The triangular site is located at the western extremity of the Glynneath/Cwmgrach settlement boundary, as shown on the attached plan. It contains a small pond (more like a bog) and is bounded on the north-western side by a natural fence/hedge boundary, on the south side by a road (and the bog) and on the eastern side is contingent with a development site with no boundary between. There are no trees on the site, which has some poor quality ground cover. The parcel is in fact owned by two separate landowners; the eastern section is that of my client, Mr Kevin Doherty.</p> <p>History / Background</p> <p>In 2007 consent was granted (P/2007/1378/FUL) for three detached houses in part of the overall land parcel owned by my developer-client, who lives in the village. The construction has started on site. The access road western edge will follow the settlement boundary, leaving the whole western side of this section, which is about 33m long, as an 'open boundary' onto this access road.</p> <p>Because only part of the site is contained within the settlement boundary the consented housing scheme is limited to that section only. This leaves a scruffy piece of 'left-over' land with no natural boundary between it and the development side, but with its own natural boundary to 'open countryside' beyond which all but the most aggressive developer would agree that no further development should take place.</p> <p>The site contains a 'pond' with no real bank or definition at present, vulnerable to dumping of waste and litter making it more of a marshy swamp eyesore than any ecological benefit at present. Your highways officers are also aware of periodic flooding due to springs further up the road washing silt down and silting up the 'pond'. I believe this proposal addresses this, as set out below.</p> <p>Argument</p> <p>We believe that if this land is included into the settlement boundary there will be the following benefits (we cannot think of any dis-benefits whatever):</p> <ol style="list-style-type: none"> 1. The land can provide further suitable housing (see below); 2. The pond will become part of a site within 'landlords/freeholders curtilage', which will place maintenance responsibility finally in someone's court. Being overlooked by private owners, keen to maintain a good public frontage, and liable to overflow if not maintained, this will naturally provide pressure keep it well maintained. The income generated by developing this land is essential for it to be properly defined and managed. No one else is going to 'pick up the tab'. 3. The whole triangle will make a valuable contribution to a sense of order and clearly defined 'entrance' to the village settlement. 4. There will be no sense of 'settlement creep', since the boundary is clearly perceived as being on the far side of this site. (see photos). The existing access to the Unity Mine to the N/NW is separated from this proposed site by a single field where traditionally ponies have grazed and we are not suggesting that any intrusion into this natural boundary. <p>We believe that the strange settlement boundary in this location (see figs 8 & 9) has resulted from the historic process of UDP/LDP reviews. Here there is pressure on local landowners to submit land to LAs for inclusion to make up the required housing allocation for the next period. Existing opportunity sites are taken into account, based on land ownership rather than natural boundary features. The LA also seeks out suitable opportunity sites, and these tend to be of a significant size rather than small marginal sites such as this.</p> <p>It follows that what falls between the cracks are the anomalies - strange, illogical divisions of plots of land where no one is really interested because there</p>

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					<p>is no really significant financial, political or social gain. Such sites require a 'sponsor' or 'promoter' to be taken seriously.</p> <p>Such sites are few and far between but another is the land to the rear of a garage at Bryn (Grid reference 80955/192125, postcode SA13 2RD. We have no interest in this plot but see it as a further albeit rare example of an illogical boundary, although here there may be much more likelihood of significant development).</p> <p>Kevin Doherty of Ralph & Doherty is that sponsor. Someone with local knowledge and love of his community, and some vested interest to be sure, which together make it worth taking time and some expense to bring the opportunity to the LA's attention.</p> <p>If this land is left as it is then three householders will access through and past this piece of unmanaged and bedraggled land, entirely open to the access road, leading to a reduced attractiveness at point of sale. This no good for anyone in Cwmgwrach, especially if there is a possible planning gain here. It is likely to become a no-go space and a possible dumping ground. It really is that sort of 'edge of town', 'forgotten' space.</p> <p>As set out below the site sponsor is content to see some innovative residential provision here. It is not simply about maximising revenue or site management. We are happy to work with NPT on ideas.</p> <p>Content</p> <p>We would like to see the partial inclusion used to provide further residential accommodation at low density. There seem to be three basic options:</p> <ol style="list-style-type: none"> 1. Another house like the ones already consented 2. A live-work unit to provide a home with business space and servicing en-suite 3. Maybe two local-needs homes; e.g. sold with a restrictive covenant in perpetuity that they be sold to local farm-workers as a first home (or some other identified local need category). <p>The plan (figs 10/11) shows what could be achieved here under option 2. The option of a south-facing live-work unit, focussed around the pond, gives a service access at one end and a private/house access at the other. The example is a garage/store wing linked by a single storey workshop to the main house.</p>
Dep374	Mr S Brown		278711	Object	<p>Land adjacent to Brookside, Pontrhydyfen</p> <p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the site shown edged red on the attached plan (Appendix 1) as being within the settlement limits of Pontrhydyfen within the Local Development Plan.</p> <p>The site forms part of the curtilage of Brookside, 5 Macpelah, Pontrhydyfen with links to all the facilities this area has to offer. Application was made for the inclusion of the land subject of this application as a Candidate Site at the initial stage of the LDP process (Ref: AV2). The application for inclusion within the settlement was refused for the following reason: <i>The site does not provide a natural and logical extension to the settlement (i.e. it is not physically, functionally and visually related to the existing settlement pattern). It is therefore considered an unacceptable intrusion into the countryside.</i></p> <p><i>Decision: exclude from settlement limit .</i></p> <p>Justification for inclusion within Settlement Limits of Pontrhydyfen</p> <p>The proposed settlement boundary is tightly drawn around 'Brookside' and excludes the garden area that forms part of the planning unit of the property and which is considered to be functionally and visually part of the settlement pattern at this location.</p> <p>One of the criteria set out in the Settlement Boundaries Topic paper (August 2013) Published by the Local planning Authority states <i>'The initial step in this process was to incorporate any relevant boundary updates into a tightly drawn settlement limits (i.e. A cling film approach). Such boundary updates</i></p>

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					<p><i>involved the curtilages of dwellings where these were considered to be functionally and visually part of the settlement pattern'.</i></p> <p>It is noted that planning unit comprising the whole of the adjacent property has been included within the settlement boundary. As recently as June 2011 planning permission was granted for a dwelling within the curtilage of the adjacent property (App. No. 2011/0382 refers - plan attached). The curtilage of Brookside mirrors the curtilage of the adjacent property known as Woodview and it would appear illogical to exclude one garden area and include the other from the Settlement Limits.</p> <p>It is also noted that the dwellings included within the settlement boundary for Pontrhydyfen have their curtilages/planning units included within the settlement limits, why therefore cannot the whole extent of the planning unit for 'Brookside' be included within the settlement limits for Pontrhydyfen. The area referred to is edged red on the attached plan (Appendix 1).</p> <p>The proposed tightly drawn settlement boundary around Pontrhydyfen leaves very limited scope for windfall infill or rounding off development within this community. In an email dated 3rd October (Appendix 2) a member of the Local Development Plan team stated the following:</p> <p><i>'A settlement boundary review has been carried out to inform the emerging Deposit Plan proposals. The initial step of this process was to identify sites within tightly drawn settlement limits that represented potential infill / development opportunities. If, following this initial step, insufficient land was identified to deliver the small-site requirement, the next stage was to carry out an assessment of the opportunities to expand settlement limits. At this stage the following was considered / assessed:</i></p> <ul style="list-style-type: none"> • <i>Sites that provided a natural and logical extension to settlements (i.e. those sites that were logical in terms of being physically, functionally and visually related to the existing settlement pattern);</i> • <i>Brownfield sites located in reasonable proximity to settlements;</i> • <i>Sites with a planning history (including those with unimplemented planning permissions which had lapsed or had previously had planning permission refused but the reason for the refusal could now be overcome);</i> • <i>Sites that would not result in the coalescence of settlements;</i> • <i>Sites that would not result in an unacceptable intrusion into the countryside; and</i> • <i>Those Candidate Sites that adjoined, or were located in close proximity to the existing settlement pattern (with particular reference to highways / access issues; biodiversity; flooding etc).</i> <p><i>The settlement limits that are currently subject to consultation are the result of our review of settlement boundaries. However, as was emphasised at the meeting, the lines on the maps and indeed our proposed strategy are not 'set in stone' at this stage, and we will take all comments received on board as we look to finalise the Plan'.</i></p> <p>Officers in the LDP section have indicated that the proposed Settlement Limits are 'not set in stone' Consequently the inclusion of the whole of the planning unit at 'Brookside' would represent an opportunity to expand the village in accordance with the criteria suggested in the email and such a small change to the Settlement boundary will not adversely impact on the open countryside that lies to the south west of 'Brookside'.</p> <p>Additionally, the Settlement Topic Paper indicated that further consideration should be given to sites that provided a natural and logical extension to settlements - these included larger scale rounding off opportunities that were logical in terms of being physically, functionally and visually related to the existing settlement pattern.</p> <p>When determining the suitability or otherwise of sites for inclusion within expanded settlement limits, there are a number of factors which will ultimately influence where development can take place.</p> <p>The site is not important in environmental or historical terms and neither are there other constraints that might delay or prevent development were considered as well as those factors that may have a positive influence on where development occurs.</p> <p>The site is not within a Flood zone Areas, a Special Areas of Conservation (SAC), a Sites of Special Scientific Interest (SSSI) nor a National Nature</p>

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					<p>Reserves (NNR). However the site is located within a mining area but should not be impacted by previous coal workings.</p> <p>It is considered that the site can be incorporated into the settlement pattern in this area of Pontrhydyfen without impacting on the provisions of the emerging LDP or PPW. The proposal satisfies the criteria for sites set out in the Settlement Topic Paper and for the above reasons should be included within the settlement of this part of Pontrhydyfen.</p> <p>Paragraph 9.5.2 (page 102) of the Population and Housing Topic Paper (August 2013) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) of the same Paper under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period. However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Settlement Topic Paper (August 2013)</p> <p>9.0.3 With the exception of Dormitory settlements, all settlements have defined limits. Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>9.0.4 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy, but in areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy.</p> <p>The Settlement Topic Paper (August 2013) gave an indication as to how the Planning Authority would assess the status of particular site that were to be included within Settlement Limits. These included:</p> <ul style="list-style-type: none"> a. Sites that represented small scale infill opportunities. b. Sites with existing planning permissions that remain undeveloped. c. Derelict land. <p>The site subject of the current application for inclusion within the settlement limits satisfies the first criteria as set out above.</p> <p>Population and Housing Topic Paper (August 2013)</p> <p>9.5.2 The majority of the new housing units will be delivered through the development of specific housing sites identified within the plan whilst allowances for the emergence of windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>By drawing the Settlement Limit tightly around the village the LPA are preventing limited acceptable expansion of an area that is bounded by defensible boundaries and will not adversely impact of the designated countryside beyond.</p> <p>Conclusion</p> <p>The proposed site if included within the Settlement Limits will allow for the managed expansion of the settlement of Pontrhydyfen in a sustainable location with good access to both the areas of Neath and Port Talbot Town Centres and the more local available facilities.</p>

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					<p>Development of the site would help support the facilities and services in Pontrhydyfen and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth' of this particular area.</p> <p>Local Planning Authority considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Pontrhydyfen as defined by the Local Planning Authority and it should be included within the Settlement Limit.</p>
Dep376	Mrs Christine Davies		317956	Object	<p>Land North of Pentwyn Road, Cynnonville, Port Talbot</p> <p>This application is made in order that consideration be given for the inclusion of the site shown edged red on the attached plan (Appendix 1) as being within the settlement Limits of Cynnonville within the Local Development Plan.</p> <p>The site is located to the north of the village between established residential properties.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped.</p> <p>The site now proposed as an Alternative Site was previously referenced as Afan Valley AV5 - Residential Land at Pentwyn Road, Cynonville and was excluded from the Housing Sites allocation at Stage 3 of the Candidate Site Assessment Report (August 2013) - Page 93, for the following reason:</p> <p>The spatial strategy focuses the majority of new housing, delivered through large site allocations, on the coastal corridor along with Pontardawe and Glynneath as growth points in the valleys. The remaining valley areas of the Amman, Afan, Swansea and Dulais will not have large site allocations and will support more limited growth in line with the Settlement Strategy. Part of the site contains an area of significant biodiversity value.</p> <p>Decision: The inclusion of such a large site in the valleys is not supported as it is out of accord with the spatial strategy.</p> <p>Paragraph 9.5.2 (page 102) of the Population and Housing Topic Paper (August 2013) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) of the same Paper under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period. However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Settlement Topic Paper (August 2013)</p> <p>9.0.3 With the exception of Dormitory settlements, all settlements have defined limits. Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>9.0.4 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy, but in areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy.</p>

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					<p>9.0.5 Whether specific development proposals are appropriate or suitable outside settlement limits will be assessed with reference to the relevant topic policies within this Plan and national policy.</p> <p>Population and Housing Topic Paper (August 2013)</p> <p>9.5.2 The majority of the new housing units will be delivered through the development of specific housing sites identified within the plan whilst allowances for the emergence of windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>Justification for Inclusion as an Alternative Site</p> <p>The Settlement Limit for Cynnonville as set out in the Draft Local Development plan retains the same boundaries as the Settlement Limit set out in the extant Neath Port Talbot Unitary Development Plan.</p> <p>The UDP allowed for a limited expansion of the village but it now appears that what windfall sites were available following the publication of the UDP have now been developed leaving no scope for further development in the village.</p> <p>The strategy adopted by the Planning Authority is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims, if included within the Settlement Limits of Cynnonville.</p> <p>The site AV5 was excluded from the Draft LDP at the third stage of Assessment. Whilst it is acknowledged that the site was originally submitted as a Candidate site for housing development the LPA considered that larger sites of 10 or more dwellings should be located elsewhere other than in smaller communities. Additionally the site contains an area of 'significant biodiversity value' but notwithstanding this the current Alternative Site Application is seeking to have the area included within the Settlement Limits of Cynnonville.</p> <p>The Ecology Consultation - Report of Evidence (Copy Attached) indicates that the site area edged and hatched green poses no constraints to development. However the report indicates that the area edged and hatched orange has significant biodiversity and should not be included in any development. Consequently the area to be considered for inclusion within the Settlement Limits is the area shown edged red on the attached plan (Appendix 2).</p> <p>This will allow the LPA to consider individual applications on their individual merits taking into consideration any impact on biodiversity which can be mitigated against in the decision making process. It will also allow for the gradual expansion of the settlement within defined limits. It is considered currently that the opportunities for limited windfall sites within Cynnonville are non existent.</p> <p>Conclusion.</p> <p>The proposed site if included within the Settlement Limits allows for the managed expansion of the settlement of Cynnonville in a sustainable location with good access to both the areas of Neath and Port Talbot Town Centres and the more local available facilities.</p> <p>Development of the site would help support the facilities and services in Cynnonville and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth' of this particular area. Local Planning Authority considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Cynnonville as defined by the Local Planning Authority and it should be included within the Settlement Limit.</p>
Dep377	Mr		325888	Object	Land at Lon y Bryn, Glynneath

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	Graham Thomas				<p>Policy SC1 Settlement limits states Where development is permitted outside settlement limits, any new buildings must be located adjacent to existing buildings or settlements wherever possible and be of an appropriate scale and form.</p> <p>In making this statement within the LDP; I do not believe that consideration has been made relating to the statement with respect to the Individual Land appraisal where this consideration was not given through the Candidate Site, and more importantly to the Land that the statement applies to.</p> <p>This can be seen throughout the LDP Document with primary view to the larger settlements only and not to the Individual who may have good intentions with respect to the proposing of a property with Sustainable Energy & Carbon Emission Controls which are imperative in this day and age with Climate Change.</p> <p>We have lived in Glynneath all our lives and having worked hard all our lives; We had one aim, and that was to retire in a few years time and live on an ECO Friendly built property built on our land, with Sustainable Energy & Carbon Emission Control.</p> <p>We purchased this land 30 years ago as it was clear Agricultural land with this aim as the view from this location is Breathtaking and Swansea Bay can be seen 20miles into the distance on a clear day. We were going to plan to build a very modest but modern ECO ENERGY property to blend in between the two existing Bungalows either side of our land, and to landscape the remaining area. We have owned our land for over 30years and to our knowledge; No usage of this land has taken place for over 50 years or more. Now overgrown and requires clearing to its natural state.</p> <p>The Existing Settlement Boundary is shown on the LDP and this Boundary does not even encompass the two existing properties either side and adjacent to our Land. This is highlighted in the LDP statement on Page:27 Item 3.0.11 Policy SC1 Settlement Limits on Item:12 where clearly there are two existing Individual Settlements outside the existing Settlement Boundary.</p> <p>The property would have been an example to ALL on how Energy could be saved & harnessed in this Economic & Stressful Age with respect to an Energy Producing Property & the savings it could make on Energy today.</p> <p>It would also have fitted into the Energy Awareness Projects that people should be shown to adopt in the current climate in producing their own Energy; Such as the Welsh Governments adopted policy in agreeing to the construction of the many Wind Turbines at the rear of our land that produces part of the Energy requirements that this country depends on today.</p> <p>It would have been modest not to stand out and we believe that it would have been very tasteful in blending into the hillside location overlooking Glyn Neath; Especially situated between the two existing properties each side and adjacent to our land.</p> <p>In asking that our land may be adopted within the Local Development Plan and with Sustainable Energy and Carbon Emission control incorporated within the proposed development; We believe that this proposal is Coherent and Effective and would respectfully ask for your consideration to recommend to you in approach that this application is adopted within the Local Development Plan, where we would work closely and meticulously together with the Authority in all aspects of considerations and development.</p>
Dep379	Mr Clive Rogers		255156	Object	<p>Trem y Coedwig, Glyncorrwg (Site B)</p> <p>Good quality building plots which are ready to be developed will help to regenerate Glyncorrwg as shown in plan B. The proposed plans are adjacent to a developed site which is approximately 500 metres from the Primary School, Health Centre, recreation facilities and Post Office. Access and egress to the proposed sites are good and installation of utility services would not pose a problem.</p>
Dep380	Mr Clive Rogers		255156	Object	<p>Trem y Coedwig, Old Stone Row, Glyncorrwg (Site A)</p> <p>Good quality building plots which are ready to be developed will help to regenerate Glyncorrwg as shown in plan A. The proposed plans are adjacent to a developed site which is approximately 500 metres from the Primary School, Health Centre, recreation facilities and Post Office. Access and egress to the proposed sites are good and installation of utility services would not pose a problem.</p>
Dep393	Mr and Mrs		785448	Object	<p>Land adjoining 50 Pen Y Rhiw, Rhiwfawr (Site B)</p>

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	Richard and Mari Jones				<p>We think that the LDP is misguided and should be changed for a number of reasons.</p> <p>Firstly, as residents of Penyrhiw for over 30 years and in the case of Mari Jones (co-signatory to this objection) who was born in the village, and apart from four years living in the Swansea Valley, has lived in Penyrhiw for over 50 years. We object strongly to the fact that Rhiwfawr has been classed as 'Dormitory Settlement' (Table 3.1) within the LDP.</p> <p>If you are not aware, Rhiwfawr is a Welsh speaking village which had until recently a welsh medium primary school.</p> <p>It would appear from reading the LDP Deposit Plan that NPTCBC is deliberately causing the death of the community of Rhiwfawr by neglect.</p> <p>The Plan appears to contain a number of contradictions, in particular under Environment Strategy for Wales 2006 where it states 'by 2006 we want to see a distinctive Welsh environment thriving and contributing to the economy and social well being and health of all people in Wales'.</p> <p>Additionally the LDP talks about the Western Valleys Strategy and the Re invigorating of the Valleys, including the preserving of the spoken Welsh language, yet as stated the LDP seems to contradict these strategies by classing Rhiwfawr as a 'Dormitory Settlement' (3.0.9).</p> <p>It appears that NPTC are watching what is happening in relation to the decline of community and are not intervening as they should as mentioned in the 'Western Valleys Strategy and the Re Invigorating of the valleys'.</p> <p>Having read the letter of responses from the Department of Education and Skills WAG dated 14/7/3011 addressed to Mr Karl Napieralla Director of Education NPTCBC in relation to the Councils proposal to close Rhiwfawr School. It is notes that at paragraph 14 and 29 of the letter, that the costs of maintaining the school was a major significance, and at paragraph 27 it was pointed out that the alternative school YGGD Cwmllynfell was in relatively close proximity to Rhiwfawr. This would appear to be another contradiction in the Re Invigoration of the Valleys.</p> <p>It is our opinion that Rhiwfawr is not a 'Dormitory Settlement' and is a community that thrives from its location in that it is in close proximity to both Cwmllynfell and Cwmtwrch. Additionally within 2 miles there are three large superstores namely Asda in Ystalyfera and Tesco and Co-op in Glanrhyd. There are also a number of restaurants within 2 miles of Rhiwfawr.</p> <p>In addition to the above, residents within Cwmllynfell and Rhiwfawr have access to facilities in neighbouring authorities namely Powys Leisure Centre in Ystradgynlais all within minutes from our homes. There are also theatres and Cinemas in Ystradgynlais and Upper Brynamman, again a mater of minutes.</p> <p>A lot of these facilities are closer to the residents of Rhiwfawr and Cwmllynfell than some of the villages in the Neath and Port Talbot areas.</p> <p>In relation to our application to include land adjacent to 50 Penyrhiw, Rhiwfawr Land Reg Title Number CYM593619 Ordnance Survey Map Reference SN7411SW.</p> <p>This is a stand alone plot of land which is know as Castle Square. Up until the mid 1970's there were two semi detached dwellings, one of which was the Post Office for the village. By this time the properties has fallen into disrepair and the owner was instructed by the then Local Authority, Lliw Valley Council, to demolish them for safety reasons.</p> <p>This was done and in fact a large amount of the resulting hardcore was subsequently used to help make the base for Rhiwfawr Community Hall during its construction. A portion of the wall of the properties still remains.</p> <p>Also during this period 'Outlay Planning' was granted for this plot of land but lapsed as no detailed building application was submitted.</p> <p>In March 2013 after the death of the landowner the plot was left to the granddaughter and daughter of the signatories of this objection.</p> <p>As stated the land is a stand alone plot and is not agriculture land and is completely separate from any land that surrounds it.</p>

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					<p>The services from the previous buildings are still present on this plot. The stopcock for the mains water is still in present on site and access to the main sewer are buried under the remains of the old building, so all the services are already on site. In relation to the other part of the land, edged in red on the plans, below the existing two properties, this is made up land which we feel is also suitable for development.</p> <p>The granddaughter and new owner of the land is Miss Amy Nicole Jones who was born and raised in the village all her life. She attended Rhiwfawr Primary School and Ysgol Gyfun Ystalyfera all through the medium of Welsh, and Welsh being her first language, she then attended sixth form education at Neath Collage and is presently studying for a degree at De Montfort University Leicester.</p> <p>When her grandparents were alive they informed her that the land in question would be left to her as she grew up there and for her to have the opportunity to settle in Rhiwfawr if she wished.</p> <p>Having read the LDP it is apparent that is has been drawn up for the benefit of major developers and is clearly identified large tracts of 'Brown Field' land as a result of the demise of various industries within NPTB, which is quite rightly so.</p> <p>However, like ourselves, I believe that there are a large amount of constituents within the Borough who own parcels of land on a small scale all of which are suitable for development, yet they appear to have been ignored in this LDP.</p> <p>Additionally, we believe that a number of these parcels of land are situated in similar locations to ours and that their development would assist NPT in achieving their targets set the WAG and also ensure the 'Distinctive Welsh Environment' as per the Environment Strategy for Wales (2006).</p> <p>It is our opinion that not every person wants to leave their place of birth and upbringing to move into an area alien to them both socially and culturally, particularly as a result if neglect of their own community by their Local Authority which is contrary to the Published Strategy of the said Authority.</p> <p>We propose that paragraph 5.1.8 be amended to include Rhiwfawr and not to class it as a 'Dormitory Settlement'.</p>
Dep394	Mr David Eurof Davies		785451	Object	<p>Wenallt Garage Site (off Heol Wenallt), Cwmgwrach</p> <p>Policy EC6 states that appropriate work-live units will be permitted in the Valley Strategy area, and one of the main criteria associated with Policy EC6, is that a site must lie within or immediately adjacent to the settlement limit. In addition, page 106 (within the implementation and monitoring section) states that the LDP encourages the development of appropriate live work units, and aims to receive 5-10 proposal submissions by the first scheduled LDP review. As outlined above, I wish to propose an alternative site which currently does not meet the criteria, but which could yield more live work units with a change to the policy wording.</p>
Dep400	Mr Sam Hawking		785482	Object	<p>Land to the west of 62 Afon Road, Dyffryn Rhondda</p> <p>This submission objects to the omission of the parcel of land described within. We see the benefits of this site as follows:</p> <ul style="list-style-type: none"> • it is central to the linear settlement boundary, albeit for some reason this part to the north of the A4107 has not been included; • it is on a bus route on a major valley road; indeed there is a bus stop immediately adjacent; • it is immediately adjacent to the communities key facilities, i.e. it is perhaps the most sustainable spot in the village apart from the existing terrace; • the site is not deep: it will generate a similar, appropriate and familiar form of development typical of the valleys in the area; • the fact that development can take place on the northern side is evidenced elsewhere locally, even currently (see appendix 7); • because of the topography the houses on the other side of the road would suffer no interruption of views because of development; • it would contribute in a modest and appropriate way (albeit if NPT joined in perhaps in a more significant way) to the sustainability of this village; • it could also help meet a range of specific local housing need; it is within ready commuter distance to Port Talbot and, via the B4287, to Cimla/Neath; • no-one could realistically accuse NPT of allowing insensitive overdevelopment here; • it provides more of a sense of 'place' to this strung-out linear village, which currently lacks a real sense of 'heart'; • it would be part, we trust, of a new proactive policy to support and strengthen existing marginal villages; at the same time we would like to see

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					<p>other section of the down-side' developed for local needs (business and commerce, not just housing, although until more people live here the chances of business taking interest in a depressed economy will wane;</p> <ul style="list-style-type: none"> with this approach, set within thousands of hectares of open space and commercial forestry around the village which will never be developed, there is available land - within the 'obvious' settlement boundary - enabling sustainable growth without impacting the local scenery and beauty. <p>Conclusion</p> <p>For the reasons set out above we object to the procedural test P1 being adequate, to Consistency tests C1 & C4 for failing to take into account the specific needs of marginal villages which are a feature of this region.</p> <p>We wish to object to Coherence and Effectiveness tests CE1 and CE4 with regard to Duffryn and specifically to encourage the inclusion of our site and indeed others on the down-side of the road.</p>
Dep402	Mr and Mrs Richard and Mari Jones		785448	Object	<p>Land adjoining 50 Pen Y Rhiw, Rhiwfawr (Site A)</p> <p>We think that the LDP is misguided and should be changed for a number of reasons.</p> <p>Firstly, as residents of Penyrhiw for over 30 years and in the case of Mari Jones (co-signatory to this objection) who was born in the village, and apart from four years living in the Swansea Valley, has lived in Penyrhiw for over 50 years. We object strongly to the fact that Rhiwfawr has been classed as 'Dormitory Settlement' (Table 3.1) within the LDP.</p> <p>If you are not aware, Rhiwfawr is a Welsh speaking village which had until recently a welsh medium primary school.</p> <p>It would appear from reading the LDP Deposit Plan that NPTCBC is deliberately causing the death of the community of Rhiwfawr by neglect.</p> <p>The Plan appears to contain a number of contradictions, in particular under Environment Strategy for Wales 2006 where it states 'by 2006 we want to see a distinctive Welsh environment thriving and contributing to the economy and social well being and health of all people in Wales'.</p> <p>Additionally the LDP talks about the Western Valleys Strategy and the Re invigorating of the Valleys, including the preserving of the spoken Welsh language, yet as stated the LDP seems to contradict these strategies by classing Rhiwfawr as a 'Dormitory Settlement' (3.0.9).</p> <p>It appears that NPTC are watching what is happening in relation to the decline of community and are not intervening as they should as mentioned in the 'Western Valleys Strategy and the Re Invigorating of the valleys'.</p> <p>Having read the letter of responses from the Department of Education and Skills WAG dated 14/7/3011 addressed to Mr Karl Napieralla Director of Education NPTCBC in relation to the Councils proposal to close Rhiwfawr School. It is notes that at paragraph 14 and 29 of the letter, that the costs of maintaining the school was a major significance, and at paragraph 27 it was pointed out that the alternative school YGGD Cwmllynfell was in relatively close proximity to Rhiwfawr. This would appear to be another contradiction in the Re Invigoration of the Valleys.</p> <p>It is our opinion that Rhiwfawr is not a 'Dormitory Settlement' and is a community that thrives from its location in that it is in close proximity to both Cwmllynfell and Cwmtwrch. Additionally within 2 miles there are three large superstores namely Asda in Ystalyfera and Tesco and Co-op in Glanrhyd. There are also a number of restaurants within 2 miles of Rhiwfawr.</p> <p>In addition to the above, residents within Cwmllynfell and Rhiwfawr have access to facilities in neighbouring authorities namely Powys Leisure Centre in Ystradgynlais all within minutes from our homes. There are also theatres and Cinemas in Ystradgynlais and Upper Brynamman, again a matter of minutes.</p> <p>A lot of these facilities are closer to the residents of Rhiwfawr and Cwmllynfell than some of the villages in the Neath and Port Talbot areas.</p> <p>In relation to our application to include land adjacent to 50 Penyrhiw, Rhiwfawr Land Reg Title Number CYM593619 Ordnance Survey Map Reference SN7411SW.</p>

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					<p>This is a stand alone plot of land which is know as Castle Square. Up until the mid 1970's there were two semi detached dwellings, one of which was the Post Office for the village. By this time the properties has fallen into disrepair and the owner was instructed by the then Local Authority, Lliw Valley Council, to demolish them for safety reasons.</p> <p>This was done and in fact a large amount of the resulting hardcore was subsequently used to help make the base for Rhiwfawr Community Hall during its construction. A portion of the wall of the properties still remains.</p> <p>Also during this period 'Outlay Planning' was granted for this plot of land but lapsed as no detailed building application was submitted.</p> <p>In March 2013 after the death of the landowner the plot was left to the granddaughter and daughter of the signatories of this objection.</p> <p>As stated the land is a stand alone plot and is not agriculture land and is completely separate from any land that surrounds it.</p> <p>The services from the previous buildings are still present on this plot. The stopcock for the mains water is still in present on site and access to the main sewer are buried under the remains of the old building, so all the services are already on site. In relation to the other part of the land, edged in red on the plans, below the existing two properties, this is made up land which we feel is also suitable for development.</p> <p>The granddaughter and new owner of the land is Miss Amy Nicole Jones who was born and raised in the village all her life. She attended Rhiwfawr Primary School and Ysgol Gyfun Ystalyfera all through the medium of Welsh, and Welsh being her first language, she then attended sixth form education at Neath Collage and is presently studying for a degree at De Montfort University Leicester.</p> <p>When her grandparents were alive they informed her that the land in question would be left to her as she grew up there and for her to have the opportunity to settle in Rhiwfawr if she wished.</p> <p>Having read the LDP it is apparent that is has been drawn up for the benefit of major developers and is clearly identified large tracts of 'Brown Field' land as a result of the demise of various industries within NPTB, which is quite rightly so.</p> <p>However, like ourselves, I believe that there are a large amount of constituents within the Borough who own parcels of land on a small scale all of which are suitable for development, yet they appear to have been ignored in this LDP.</p> <p>Additionally, we believe that a number of these parcels of land are situated in similar locations to ours and that their development would assist NPT in achieving their targets set the WAG and also ensure the 'Distinctive Welsh Environment' as per the Environment Strategy for Wales (2006).</p> <p>It is our opinion that not every person wants to leave their place of birth and upbringing to move into an area alien to them both socially and culturally, particularly as a result if neglect of their own community by their Local Authority which is contrary to the Published Strategy of the said Authority.</p> <p>We propose that paragraph 5.1.8 be amended to include Rhiwfawr and not to class it as a 'Dormitory Settlement'.</p>
Dep459	Mr Tony Brinkworth		218483	Object	<p>Land at Cydgoed Quarry, Tonna, Neath</p> <p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states:</p> <p>In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well- being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity.</p> <p>How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement.</p> <p>I have just seen my site N37 in the LDP Candidate Site Assessment Report (August 2013). The reason for rejection is "The site is located in the open</p>

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					<p>countryside divorced from any existing settlement and will therefore be dealt with through the Development Control process" I believe they have not been comprehensive in carrying out the Assessment of site N37/218483, due to wording "immediately adjacent to a settlement limit". Therefore my site has not been assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regard to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because it is divorced from the existing settlement..... This would allow for an assessment to be made on Candidate site N37, for one of the first code 6 of the code for sustainable homes to be built in Wales if not the UK with on site renewable energy and giving a 10 acre improvement in biodiversity, on a derelict part contaminated brownfield site.</p> <p>The concept is to build one of the first code 6 of the code for Sustainable Homes with onsite renewable energy, to be built in Wales if not the UK on a derelict part contaminated brownfield site, with a 10 acre improvement in the adjoining woodland via Better Woodlands for Wales' Management Plan.</p> <p>Why Candidate site N37/218483 (Residential)</p> <p>One house and garage/workshop/wood store/green house, with onsite renewable energy giving zero carbon emissions. One of the first code 6 of the code for sustainable homes to be built in Wales if not the UK on a derelict part contaminated brownfield site. This will be appropriately designed to be aesthetically sympathetic to the surrounding environment. As opposed to meeting demand by development of higher grade land in the open countryside.</p> <p>Brownfield Candidate site N37 (approximately 0.2ha) part of Cydgoed Quarry, Quarry Road, Tonna, Neath. Is a small secluded area within an area of sixteen acres in my ownership, some ten acres of which is natural woodland, with mature and immature trees growing. However the area which is the candidate site is quite different, because the site in question is not in a prominent position but a small enclosed area of land within a wooded hillside, which is surrounded on three sides by a rock face to the rear, and high mounds to the left and right, exclusive and not legally accessible to the general public, and with the view to the public negligible.</p> <p>It was cleared of residual quarried stone in the late 1950s, which was then left as a flat area of land some 0.4ha, which during subsequent years has resulted in mounds being manufactured by the waste which has been dumped there, and Japanese Knotweed is the dominant vegetation on the site, with no mature trees.</p> <p>On entering upon the site you would be standing on at least one metre of this waste consisting of building materials, bricks, breeze blocks, car parts including tyres, part buried car chassis, pipes, roofing sheets, tiles, plastic containers together with general household waste. A lot of this waste has become buried and partly buried, having been deposited over a number of years.</p> <p>Hundreds of tonnes of tipped waste from the last fifty years in this derelict area would have to be systematically excavated with the unwanted waste removed to an approved facility. Unwanted waste would consist of- tractor tyre and other car tyres, car chassis, fifty gallon drums, plastic pipes and containers, asbestos roofing ridges and sheets, wood, old clothing, shoes, carpets, and general household waste, all of which can be seen, along with other waste which will show up when excavated.</p> <p>Please see Neath Port Talbot Officers Planning Report P/2007/1173 (page 2 of 4) which states: 'The site has subsequently been used informally as a tip'</p> <p>Sustainable Sustainable development is the core principle underpinning planning. At the heart of Sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. How could the LPA get a more sustainable candidate site than this one, it has to be one of the first in Wales if not the UK to include: The development of a renewable energy project/dwelling house related to climate change. On-site renewable energy Zero carbon emissions using waste wood as fuel Solar panels/photovoltaic cells Ground source heat pump On site water</p>

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					<p>Rain water harvesting Sewage treatment plant Sustainable building to code 6 of the code for Sustainable Homes Biodiversity improvement on ten acres via BWW Management Plan.</p> <p>This site is not in a prominent position it certainly is not sticking out, noticeable or conspicuous. Please see planning refusal drawing for P2007/1173.</p> <p>The site is enclosed to the west of a wooded hillside, which is surrounded on three sides by a rock dace to the rear, and high mounds to the left and right, and is not liable to flooding, with the view to the public negligible, if a house was built on this site unless you were invited into the site you would have to be in a helicopter or balloon to see the house.</p> <p>The main sewer and water is some 180 metres away to Mount Pleasant or can be connected at Henfaes terrace on Quarry Road if needed. The preferred option is to use the water spring and have an onsite sewage treatment plant.</p> <p>The site is at the start of the quarry, which has high voltage overhead cables present near the entrance, the wooded area if further to the east of the appeal site, going towards the 30 metre high mast with cabins and associated works at the side of Quarry Road some 115 metres away,</p> <p>This mast can be seen from miles away, and has a detrimental; effect on the visual amenity of the surrounding area. Some 70metres to the north is one of two rugby fields next to Tonna Rugby Club and associated car park for some 80 plus vehicles.</p> <p>The overhead high voltage cables run above Tonna Rugby Club car park, and up parallel with the road, crossing Quarry Road, to a post on the quarry cliff, where it tee's of running down parallel to Quarry Road, and to the rear of the quarry and beyond towards the farm house's.</p> <p>The local bus stop is only some 400metres away at Henfaes Road (B4434), the junior/infants school some 325 metres at School Road, local houses being some 175metres away, with one of two Rugby/football fields some 75 metres away.</p> <p>I therefore request that further consideration should be given to the proposal for a self-sustainable energy efficient dwelling in a location which would not impact upon the character or appearance of the countryside, biodiversity, the amenities of neighbouring residents or other land users, traffic generation or highway safety. This renewable energy project would in fact, reclaim and enhance the derelict area, improve biodiversity, and ensure that best use is made of an area of land, which in the relatively near future will be sought by individuals and local authorities themselves, having regard to the ever-increasing cost of energy to traditional homes and the need to reduce the impact on the environment in the long term.</p> <p>Please see the LPA Officers report P2007/1173 for the same site location, page 3 of 4 states:</p> <p>'Turning to visual and residential amenities, the application seeks outline permission only with all matters (barring access) reserved for consideration at a later date. However due to the size of the site and its relationships to the neighbouring prosperities (200m South of the village of Tonna) it is considered that an appropriately designed dwelling could be sites within this site so that there would be no detrimental impact upon the residential amenity of the neighbouring prosperities' .</p> <p>Appeal Decision for P2007/1173, Appeal Ref: Y6930/A/08/2081011.</p> <p>Climate Change Climate change is a key challenge facing our generation, as the Barker and Stren Reports made clear: planning will be one of the elements required in a successful response to climate change and ensuring that the planning system plays a role in helping with mitigation and adaptation is therefore an important priority. Local Planning Authorities have a crucial role to play in tackling climate change.</p> <p>Better Woodlands for Wales Management Plan, case Ref: 14717. Pages 1,2,3,4,5,6,of 22 and Sub Compartment Map 1/1. This plan would improve the biodiversity of the woodland (10 acres) and plays a key part in achieving quality timber by implementing a programme of selective felling and thinning, with the objective of improving tree quality, increasing light to the woodland floor and promoting natural regeneration. Approximately 8 tonnes of the 20 tonnes of waste wood produced per year will be utilised as biomass- firewood. This on-site renewable energy (giving zero carbon emissions) resourced together with other energy savings will provide for a dwelling to level 6 of the code for sustainable homes.</p>

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					<p>No trees have to be felled within the candidate site, Please see Report into Tree cover at Cydgoed Quarry, Tonna. (Candidate site area as marked on drawing TB/CQ/04.</p> <p>Fresh water will be obtained from a nearby spring on the property which previously serviced Citcoed Quarry Cottages. Cydgoed Quarry is also known as Cydcoed Quarry, Cytgoed Quarry and Citcoed Quarry.</p> <p>The location of the site is a sun trap, which allows for good orientation of the dwellings to make controlled use of solar gain. Biodegradable garden, food and kitchen waste will be composted and used to benefit the garden/green house for the growing of fruit+ vegetables.</p> <p>With reference to 'Save our village action meeting' on the 24th September 2009. This meeting was chaired by councillor Bill Walters with Mr. Andrew Hunt..... I find it unfair that the action meeting were led to believe that there was to be a 100 plus houses wanted on the quarry site. They were not correctly informed of my intensions for this candidate site.</p> <p>I aim to improve, protect and enhance the environment. I would encourage you to take on board the approach to promote climate change, environment and the sustainable issues of this candidate site. You should consider this ambitious initiative for its conservation, enhancement and better management if the environment, thus ensuring the potential contribution to the regional and local economy, thus ensuring the potential contribution to the regional and local economy is unlocked in ways that protect and enhance the environment, and stimulate regeneration and renewal that will be achieved with this site.</p> <p>The surplus biomass from Cydgoed Quarry in the form of waste wood some 10 tonnes per year, can be sold locally to benefit anyone who would possibly want to replace their individual domestic boiler for a biomass one. Also surplus electricity generated by a wind turbine or three smaller wind turbines to make more sensitive exploitation of renewable energy, would be sold to the energy companies.</p> <p>I believe the LPA should be giving greater priority to tackling climate change and encouraging sustainable development, therefore you should use this renewable energy project as a basis for implementing new initiatives. The LPA should have ensured that there is flexibility to realise the opportunity for this sustainable climate responsive candidate site at Cydgoed Quarry. In order to accelerate the move towards higher sustainability standards with a zero carbon target by having on-site renewable energy, you should be supporting this proposal as it will mitigate the effects of climate change by reducing carbon and other greenhouse gas emissions. Wood fuel grown on-site can make a small but significant contribution to the renewable energy sector in Wales as can rainwater harvesting, ground source heat pump, solar panels, wind turbine or a few smaller wind turbines to make more sensitive exploitation of renewable energy, water hydro generated electricity is also possible.</p> <p>My two local Councillors inquired to the Head of Planning Mr G White before he retired, on my behalf with regard to candidate site N37. I was informed that he would not look at the site as it had been in for planning before and also rejected on appeal by the Welsh Assemblies Inspectorate. On hearing his reason I asked my 2 Councillors if they would again ask Mr G White, as I believe that the Local Development Plan should be a separate issue from my previous planning applications and appeals, as most if not all of the candidate sites are classes as in the countryside.</p> <p>Please see planning application P2010/0894 and Indicative Layout Plan. The Annexes and the separate bundles referred to within the planning application are not included.</p> <p>Design and Access statement in support of proposed development at Cydcoed Quarry, Tonna, Neath</p> <p>Ordnance Survey of Public foot paths and Bridleways.</p> <p>Again after putting my concerns to Mr G White my councillors came back with exactly the same reply from Mr G Whit - It's been put before planning and refused also rejected on appeal by Cardiff, and that he was not going to look at it.</p> <p>Brief Planning history and appraisal of the Appeal/Application site on Land at Cydgoed Quarry, Tonna, Neath.</p> <p>Planning Application P/2006/1021 (11/07/2006). Refused on 19/09/2006. Planning Appeal APP/Y6930/A/06/200483. Decision - dismissed on 26/03/2007.</p>

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					<p>Re-submission of P Application P/2007/1173 (19.07.2007). Refused on 14.04.2008. Planning Appeal APP/Y3930/A/08/2081011. Decision - dismissed on 17.11.2008.</p> <p>Planning Application P2010/0894 (26.08.2010). Refused on 11.11.2010. Planning Appeal APP/Y6930/A/11/2144004. Decision - dismissed on 06.05.2011.</p> <p>Hence this is the reason why I am having to inform you about this candidate site, as I believe this site with Welsh and National policies and international concerns regarding sustainable development, global warming and its effects, should have been given some serious consideration by the local authority, in determining whether to allow this small renewable energy development project, on a derelict part contaminated Brown-field area. I believe it's what the National Government and Welsh Assembly are trying to implement.</p> <p>I am prepared to enter into a S106 unilateral undertaking, which include obligations with regard to BWW Management Plan 14717. The woodland would have more than enough waste wood to heat a house on the candidate site, which would remove the transport costs and would stop the neglect of the woodlands. I am prepared to go to the expense of incorporating this cost year after year in to this renewable energy project.</p> <p>Residential cottage(s) on the old quarry site have existed in the past, (Citcoed Quarry Cottages). It is understood that this building was serviced by a water source from an on-site spring. I will attempt to access that same source I order to provide water, which will also contribute towards the goal of achieving a level 6 home using on-site renewable zero carbon energy sources.</p> <p>The private access roads to the site from Mount Pleasant/Dolcoed Terrace around to Henfaes Terrace as shown on plan enclosed, are now in my sole ownership, and would over time, seek to improve and maintain the access roads in order to provide easier access to the site and surrounding area. It would have the effect of policing the maintenance of the surrounding countryside and would provide for footpath surveillance, which would result in a safer environment for the public. It would also deter illegal off-road riding/driving of motor vehicles and four wheel drive 'jeep' type vehicles.</p> <p>The area of woodland next to the application site would not only provide a self-sustainable source of energy efficient fuel for a dwelling, but would also benefit from the input from the BWW (Better Woodlands for Wales) which would result in that area being maintained and enhance for the future, whilst also providing a natural resource of zero carbon renewable energy.</p> <p>In conclusion I submit that national policies and international concerns regarding global warming and it effects should be give serious consideration by local authorities and the Welsh Assembly in determining whether to allow small renewable energy development projects on derelict brown-field areas such as this candidate site N37 as opposed to meeting demand by development of higher grade land in the open countryside.</p> <p>I believe that the 2 Rugby/football fields and surrounding wooded area are not owned by the school but by the Council and leased to Tonna Rugby Club, with a blanket tree preservation order in place. Therefore candidate site N37 is defensible in regards to an extended settlement boundary, as it is confined within the quarry walls. Please see suggested new settlement boundary Plan 1 and 2, the registered site plan N37/218483 also the UDP map and the old Borough of Neath Local Plan (Inset map 3, map reference E61C).</p> <p>Finally I respectfully request that this inspector take all the information into account and conclude that there are convincing and compelling arguments for development to be sited in this candidate site N37.</p>
Dep460		Giroma Developments Ltd	324467	Object	<p>Land adjoining Travancore, Pentwyn Road, Cynnonville</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.25 hectares, set immediately to the rear of established residential houses at Pentwyn Road, Cynnonville.</p> <p>We seek that the land be allocated, together with an adjoining site with planning permission for 20 units, as Housing Site, under Policy H1, and an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cynnonville is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be</p>

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					<p>allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • the potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Cynonville will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cynonville, without any demonstrable harm to the central valley landscape, by utilising mature and defensive natural and man-made boundaries to distinguish it from surrounding countryside. The site is part of previously developed land, being part of a former garden centre, with direct access off Pentwyn Road. The land in question constitutes a sliver of land some 75 metres in length by 30 metres in depth, set between the rear garden boundaries of houses, and the crest of a former railway cutting. It is therefore not considered to be an expansion into open countryside, given that the railway cutting provides a solid, man-made barrier consolidating the built form of Cynonville. 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified. 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses. 5. Aid to foster the sense of Afan Valley identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Village" status within the LDP. <p>The site should be considered as a minor extension to that granted Outline Planning Permission under P2010/1176 in November 2011, and should contribute to the allocation of housing under Policy H1 for the above reasons. The minor addition will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some three additional units, to the 20 units already benefiting from permission will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep461	Mr HN Lloyd		324453	Object	<p>Land off Cilmaengwyn Road, Ynysmeudwy</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.1 hectares, set immediately adjoining the junction of Cilmaengwyn with Ynysmeudwy Road, within the settlement of Ynysmeudwy. The site forms part of a short terrace of properties, being No's 8-12 Cilmaengwyn.</p> <p>We seek that an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Ynysmeudwy is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs.</p> <p>The selection criteria are as follows:</p> <ul style="list-style-type: none"> • The availability of previously developed sites and empty or underused buildings and their suitability for housing use; • The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for

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					<p>improving such accessibility;</p> <ul style="list-style-type: none"> • The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • The scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • The physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • The potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Ynysmeudwy will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cilmaengwyn, without any demonstrable harm to the urban streetscene, by utilising mature and defensive natural and man-made boundaries, such as the Swansea Canal, to distinguish it from surrounding countryside on the opposite side of the canal and A4067 Swansea Valley Road. The site lies directly adjoining and directly opposite a continuous frontage of houses fronting Cilmaengwyn, and capable of direct access off that highway. The development of the site with one dwelling would replicate a linear frontage of residential properties respecting the character and setting of the south-eastern side of that highway. The Objection site will therefore consolidate the built form of Ynysmeudwy. 2. Be fully accessible to public transport, being within easy walking distance of major bus routes. It is also within walking distance of the village primary school and local shops at Ynysmeudwy. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified. 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses. 5. Aid to foster the sense of a Pontardawe suburb identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Town" status within the LDP. <p>The site should be considered as a minor addition, which will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the inclusion of the site for only one additional unit will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep463	Mr R T Brown		457396	Object	<p>Land at Lon y Nant, Glynneath</p> <p>This submission objects to the continuing and persistent omission of the parcel of land (NV74) from the Glynneath settlement boundary, as described within this document. It proposes that a part of the land ownership be included in the revised settlement limit.</p> <p>Analysis of this piece of land and its context</p> <p>The objector owns a parcel of land at the north-east end of Lon Y Nant (approximately 0.51H), grid reference 288339/207009. See appendix 1 for site location plan on old OS maps and appendix 2 on an updated base plan which shows the full extent of land ownership. See appendix 3 for location within the current UDP boundary.</p> <p>The land is connected at its narrowest point via a dropped kerb to Lon Y Nant, which leads down to the main (traffic light controlled) junction from the A465 into Glynneath. As the crow flies the centre of Glynneath and its facilities (supermarket, police station, PO, schools, GP surgery, bus routes, etc) lie between 300-500m from the site. See appendix 4 for photos of site.</p> <p>The land is a triangular shape broadening out away for Lon Y Nant, and consists of a long, relatively flat clearing amongst surrounding trees, with a stream forming the eastern boundary and a steeply rising hillside within the western boundary. The OS maps indicate the existing track that leads along the site to the end. In recent time the NRW has at their own expense erected a fence along the stream (within the objector's site) to try to prevent illegal trout fishing intruders.</p>

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					<p>The site is generally hidden from view except from the immediate entrance on Lon Y Nant and, in winter, across the southern neighbour's land.</p> <p>There remains some evidence of previous activity on the site and a block work shed still remains and the concrete base to the building nearer the front which once stood there. On the older OS maps of the area there is a series of buildings shown NNE of the site going back into the woodland. (see appendix 1). A Crufts champion dog was bred in outbuildings on the site by the previous owners and the area immediately to the north was historically a mining area, as was (and still is to a limited extent) much of the surrounding region generally. The objector's uncles recalled how in the days of mining on the slopes above this site was covered with sheds and huts serving the workings above. The OS maps of the area show the unnatural, man-made landscape of steep soil heaps including the one locals called the 'Indian Tip' in the hill due north and that closes the neck of the site. The growth of trees following the end of mining operations masks this former intense activity.</p> <p>There is no landscape designation to this woodland apart from being within the 'settlement protection zone'. It is now a protrusion into maturing woodland, albeit there are no trees within the proposed inclusion area. Most would agree that it is a beautiful, desirable and level setting perfect for a house or tourist facility, and yet with ease of access for construction.</p> <p>Lon Y Nant continues from the site to the west where it is names Lon Y Bryn and some of the houses off it are outside the settlement limit, e.g. 24 (see photos) whose garden is cut into the woodland behind, and is set some 50m above our site. Some time ago Neath Port Talbot Borough Council (NPTCBC) put the land to the north skirting the road, which they own, onto the market for sale 'with potential for planning consent', but it was subsequently withdrawn. NPTCBC clearly also felt that the presence of a road etc had a strong logic for sustainable infill development at this point.</p> <p>Indeed a feature of this NE corner of Glynneath might be said to be the number of dispersed dwellings just outside the settlement limit. This includes a track that branches off Lon y Nant further to the south going NNE: it runs parallel with the site, on the ridge of the hill to the east, and serves about 7 houses outside the settlement boundary. These houses can barely be seen from the site (see appendix 4).</p> <p>As a result the settlement boundary in this area and on the north limit consists of a number of projecting 'fingers' as it follows the hillside contours.</p> <p>Policy framework</p> <p>There is no landscape designation for this site within the proposed LDP. In the Draft LDP (table 3.1) Glynneath is defined as a 'District Centre'. The LDP Local Policy context (clause 1.2.39) states that an aim is to: <i>"Develop communities that are strong and sustainable through meeting housing needs across all tenures;"</i> and later in OB7 <i>"Provide an adequate supply, mix, type and tenure of housing within sustainable settlements to meet the needs of the projected population. [KI 5, KI 6 and KI 7]</i> This must involve ensuring a wide and diverse mix of sites, however small.</p> <p>In section 2 "The Strategy: area-based objectives, under OB6 the draft LDP states: <i>"Reinvigorate the Valley areas and improve economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth."</i> In the Development Strategy section that arises from this, clause 2.3.12, it includes:</p> <ul style="list-style-type: none"> • <i>"Identifying Pontardawe and the Upper Neath Valley as strategic growth areas in the Valleys which will create a mechanism to co-ordinate investment and ensure the benefits of growth and regeneration are shared more widely throughout the valley communities;</i> • <i>Providing a flexible approach to development within the Valley communities."</i> <p>We suggest that for a businessperson or investor seeking to relocate into Glynneath there is a lack of suitable new sites of the quality they are likely to seek being or becoming available. There is a lack of flexibility and pro-activity in identifying, or allowing the market to deliver, suitable sites to meet this aim. The 4 identified sites in the LDP are new sites for mass housing, which most business people would avoid. After this there is a '%-based' approach to sites available. At the same time when these are presented strong resistance is what is encountered, as seen on this site. This is more of a 'Grand Designs' site that most upwardly mobile would wish to purchase and develop out and in which a sensitive and beautiful environment would be high priority.</p> <p>There does not need to be a presumption that the site be earmarked for residential use. It could provide a number of uses:</p>

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					<ul style="list-style-type: none"> meet the draft SP13 policy for increased sites for tourism, being well located for access into the Brecon Beacons National Park. It could be a base for cycling, bunkhouses or B & B or a combination. provide a live-work unit, being well located for semi-commercial use. <p>In the previous examination of this land (November 2005) the LPA's attitude was somewhat dismissive, stating that sufficient land had been identified for housing use in Glynneath. Those in the estates professions know that this is the rule in most regions of the UK and thus at every review the same sites roll forward, often for 20 years or more. But many, or perhaps even the majority, remain unlocked. A few new, significant sites, often also subsequently remaining unlocked for many years, are then added each time. In the case of Glynneath 'The Lamb and Flag'/Park Avenue site has been set aside and enlarged over at least 7 years to provide the vast majority of the Glynneath housing provision (150 out of 274 from 4 earmarked sites). It remains unlocked and much of it is overlooked and dominated by the busy 'Head of the Valleys' road, not somewhere many would chose to live.</p> <p>The facts and experience show that these small sites are easy to unlock and develop, relying on individual private funding, requiring little co-ordination with other groups, funders, RSLs or local authorities, which bedevils these larger sites.</p> <p>Small incidental sites like this should, we suggest, not be primarily evaluated on this criteria, but judged rather on their appropriateness and immediate impact. Currently this site might be argued to be a resource waste since it contributes nothing of value to Glynneath despite being directly accessible from existing roads; even views to the interior are impossible to residents.</p> <p>There should be a consistent logic to the settlement limit, especially since where this is not seen to be the case the public start to believe in some corrupt or at least less-than-transparent inner workings of the system. These sites, if designated for housing, will make little difference individually to the housing provision, but will broaden a small niche provision of private sector dwellings with a high level of privacy. Glynneath, like humans, needs a rich variety of sites, and this is the nature of the housing in this immediate small quadrant.</p> <p>In terms of 'sustainability' (in simple terms no negative impacts for future successive generations) this site meets all the requirements, being adjacent and indeed closer to the heart of Glynneath than the vast majority within the settlement (see site plans). Every metre once proceeds up Lon Y Bryn is less sustainable than the is site if one wishes to be pedantic, and there are many houses there. All major utilities lie within the road to which there is an existing dropped kerb.</p> <p>In 1985 the site had consent for a new house but when this consent lapsed two subsequent applications for a single house were refused. Little had changed from 1985, apart from the housing need, and especially that of variety to attract inward investment, now being greater.</p> <p>In the November 2005 examination the LPA made a number of statements that appear either wrong or very subjective. These are set out in table 1 below.</p> <table border="1" data-bbox="1077 1318 2861 1856"> <thead> <tr> <th data-bbox="1077 1318 1614 1356">LPA statement</th> <th data-bbox="1614 1318 2861 1356">Objector's comment</th> </tr> </thead> <tbody> <tr> <td data-bbox="1077 1356 1614 1423">Including the site would be detrimental to the visual amenity and character of the area</td> <td data-bbox="1614 1356 2861 1423">Including the site does nothing to the amenity and character. It is the nature and design of any development that might do this. 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					<p>patterns of development</p> <p>allowed by the natural topography. Here, quite remarkably, there is a undeveloped piece of comparatively very flat land, accessed off a road that otherwise is entirely developed. Roads are built within towns to access development. Certainly in this case it does not access land for the benefit of the public. It was a waste of historic civic investment.</p>
					<p>The site is not considered to be more sustainable than other allocated sites within the area and would not have a significant effect on the housing totals</p> <p>Does a site have to be more sustainable than its neighbour to be included? No argument is put forward to indicate that it is less sustainable than any of the surrounding sites. Allocated sites are generally large. We have argued this point elsewhere and shown that Lon Y Bryn beyond is strictly speaking less sustainable.</p>
					<p>Proposed policy SP16 seeks to protect the environment and is set out below:</p> <p>Policy SP16 Environmental Protection</p> <p>Air, water and ground quality and the environment generally will be protected and where feasible improved through the following measures:</p> <ol style="list-style-type: none"> 1. Ensure that proposals have no significant adverse effects on water, ground or air quality and do not significantly increase pollution levels; 2. Giving preference to the development of brownfield sites over greenfield sites where appropriate and deliverable; 3. Ensuring that developments do not increase the number of people exposed to significant levels of pollution. <p>Although we recognise that it is hard to show that this site is brownfield, it is clear that it has been identified as suitable for housing in the past and has had a number of informal and low impact uses off the access road, including maintaining a flat clearing free of trees. Releasing this site does meet the spirit of preferences set out in the policy, where there is a resistance to carving out new sites within virgin land where uses might pollute or destroy existing flora, fauna and ecology. Accessible, sustainable sites so close to a town centre, unless set aside for public accessible open space, should be made to work for the community benefits.</p> <p>Settlement limit for this site</p> <p>We believe that all the land on the level part of the site should be included in the settlement limit. The reason for this is based on the discussions above, namely that there is a clearly defined 'boundary' formed by the topography, namely the steep slope of the hillside. This has been the consistent position of the objector in previous applications. If land is to be included at all then every part that makes a useful contribution without impacting other aspects of the planning constraints should be included.</p> <p>We indicate the approximate line of this boundary on the appendix 5 plan. We have indicated the line on a margin of some 3m up the slope from the hillside slope meeting the flat base to give some flexibility, since any access to the rear of the site would probably need to pass the permitted development. See appendix 3.</p> <p>If it were felt that allowing the settlement limit to continue to the very end of the site was unacceptable, we would posit that if a tourism-based use was allowed here then that area could be ideal for recreational space; if a house were permitted then that area could be a paddock for a pony or an area to keep livestock or grow food. However if a single plot house was consented then one can understand concerns that garden area might not be managed well and that it (the curtilage) might be stopped short of the end. For this reason we have indicated a line beyond which we can accept that permanent construction might be restricted. We would argue that this line relates well to existing depth of penetration of surrounding sites into the woodland. Appendix 5 shows the possible suitable location of a building on this basis.</p> <p>Conclusion</p> <p>We wish to object to Coherence and Effectiveness tests CE1 and CE4 with regard to Glynneath and specifically to encourage the inclusion of our site within the settlement boundary.</p>

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Dep470	Mr David Clifford Powell		456093	Object	<p>Land opposite St Gabriel's Court, Graig Road, Abergwynfi</p> <p>I would like all evidence and comments made by Assembly Ministers and local councillors made available to the inspector and a copy of the 'Bevan Foundation Report' of the Afan Valley which is the main document prepared for the Welsh Assembly by the Aberavon Minister in Parliament, Hywel Francis. Conclusions made by Hywel Francis have not even been taken into consideration and the report has not been used in research in the L.D.P. Deposit Plan.</p> <p>After the Welsh Assembly has paid for the report, I consider it immoral for this Deposit Plan to continue its culture of degeneration in the Afan Valley whilst the policy is for regeneration. This has to stop.</p> <p>Having lived here all my life and witnessed this culture, I find it criminal for the local authority to use statistics from these Valley communities to get millions from Europe for regeneration over the last forty years, and use the money elsewhere on the coastal corridor. This is the culture and it HAS to be addressed.</p> <p>I keep on hearing about European money not going to the people it was meant to go to in Africa due to corruption. Sadly, this is the case in Neath Port Talbot.</p> <ul style="list-style-type: none"> • L.D.P - 1.2.15 Economic Renewal: A new direction, making Wales a more attractive place to do business, encouraging innovation. Target business support. Where? Not in the Valleys • 1.2.18 Sustainable Development: 'Locally conceived and delivered projects'. Where? Not in the Valleys • 1.2.33 Economic Growth Strategy: 'To allow south-west Wales to be a confident, ambitious and connected city region'. Except the Afan Valley • 1.2.34 (1) 'Developing a more entrepreneurial culture across the city region' Except the Afan Valley • 1.2.34 (3) 'Local enterprise development' Where? • 1.2.34 (3) 'Supporting job opportunities by supporting growth within the indigenous business stock' Where? • 1.2.40 Outcome 4 'Address barriers to employment....Develop a strong network of local businesses who are able to generate automatic growth' • 2.1.1 The vision states: 'The County Borough's rural and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising.' • 2.2.2 OB6 'Reinvigorate the Valley areas and improve economic prospects' Where? Not in the Afan Valley • 2.3.12 'Provide a flexible approach to development within the Valley communities' Flexible or constraining/ constricting? Where is the plan flexible? • 2.5.3 Within the Valleys... 'A more flexible approach to development will help reinvigorate communities through small scale employment' (including live work units). Small scale? Page 106 - Target five units. Small scale it is! • 2.5.34

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					<p>'The Valley areas are still experiencing decline and far greater intervention is needed' So why does this plan/land supply fail to meet this opportunity? • 2.5.51 'There are still existing businesses...continue to thrive' But no prospects for new to start and/or be given a chance to thrive! • 3.0.11 Policy SC1 (2) Live work units immediately adjacent to a settlement limits. 5.2.30 Policy EC6 Live work units states the same. The settlement limits were drawn to consider the shape and control of the already built environment. There was no assessment of the likely impact of development in the 'open countryside; side of that line, coupled with criteria 6 that there will be no detrimental impact of neighbouring properties. This policy is basically ultra vires/ unworkable. Five units in the monitoring section confirms this. • 4.0.25 Policy SP6 (7) 'Taking a flexible approach to encourage employment uses (Live - work). There is no evidence of this. • 5.1.8 Table 5.3 There is no Land Bank in the Afan Valley. There are no new allocations for the Afan Valley. There are only sixty windfall sites over the plan for the Afan Valley. The Population and Housing Topic Paper, page 58 9.31, 'Historically, new housing provision (from windfalls) had not necessarily been anticipated and would not have been specifically allocated'. This means that Table 5.3 for the Afan Valley is based on guesswork and is being used to constrain development. Small sites are being identified at around seven to eight properties per year.</p> <p>Reinvigorate? Revitalise? • 5.2.26 Employment Uses (4) 'Development would have no detrimental impact of neighbouring properties'. A business that makes no noise... A business that makes no smells... A business that does not do anything... OR Remove the wording from 5.2.30 Policy EC6 (1) 'or immediately adjacent' and replace it with 'close proximity'. This will enable a potential 'bad neighbour' to deliver all that the plan states but the total inability of this policy in its present form to deliver any development, must be changed. • 5.2.51 Policy SP13 Tourism 'seeks to be flexible' • 5.2.54 Policy TO1 Tourism in the countryside is not tied to settlement limits, therefore building can happen for those from outside the area to come in, but those living here are strangled! • 5.2.55 'Since a large concentration of tourism facilities are located within the Valleys area, allowing development outside settlement limits will provide scope for the tourism sector to grow and contribute to reinvigorating the Valley communities.</p> <p>In the Afan Valley?</p> <ul style="list-style-type: none"> • Economic and Employment Topic Paper 8.2.7 'A more flexible approach to employment growth will be adopted in the Valley communities to reinvigorate the local economy. Flexibility and tying a policy to the line of a settlement limit are not compatible. The plan is unsound. Therefore under CE1 as the identification of land for housing and employment (or lack of it) is not translated from the written L.D.P onto the proposals maps. The land supply/employment opportunities do not logically flow. • The plan is not 'flexible' in that it is skewed to large site providers in the coastal corridor and there is little/no land available or identified so therefore no new developers can contribute towards reinvigoration/revitalisation of the Valleys and its communities.
Dep500	Mr John		286649	Object	Land East of St. David's Road, Tairgwaith

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	Doran				We feel that this site was not given fair consideration as a candidate site and was mixed up with other candidate sites in the area and was referred to as being located in Cwmgors. The site adjoins new and/or proposed development and showed a plan of a maximum of 11 new dwellings not as described in the decision which states "The inclusion of such a large site in the valleys is not supported as it is out of accord with the spatial strategy". We feel that because it is in a rural area and we are small developers we were not afforded equal opportunities as the larger developers on larger sites.
Dep529	Mr V Price		196316	Object	<p>Land at Ynys y Gored, Velindre, Port Talbot</p> <p>The land in question is essentially the final plot of the housing estate built out by Persimmon. A planning application for a dwelling is currently pending a decision. It relates well to the built form and serves no purpose being defined as countryside.</p>
Dep655	Mr Thomas Zwart		443470	Object	<p>Land to the North of Inkerman Row, Taibach</p> <p>I have read the LDP Settlement Topic Paper, Population and Housing Topic Paper, Economy and Employment Topic Paper, and Candidate Site Assessment Report. They all talk about sustainable communities and revitalisation.</p> <p>Table 5.3 indicates for Port Talbot small sites are only 100 units for the whole of Port Talbot- over 15 years that's nearly nothing.</p> <p>Windfall are unpredictable as acknowledged in the Housing and Topic Paper. I intend to build.</p> <p>The local economy will benefit financially by the number of Candidate sites being approx 385 where the average spend of £100k will bring £38.5m into the local economy. This will provide work and boost local suppliers and shop.</p> <p>My site is close to all facilities and no constraints to developing the site.</p> <p>The plan is not flexible in that most of the allocation of sites in for the large house builder on large sites with no ability for small scale developers to add to the economy and revitalise.</p>
Dep656	Mr G Billett		198427	Object	<p>Land adjacent to Dyffryn Arms, Bryncoch</p> <p>I am requesting these amendments because:</p> <ol style="list-style-type: none"> 1. I feel that the existing policy is not flexible & there is far too much emphasis on large scale developments & little consideration given to singular dwellings whose environmental impact is negligible in comparison. 2. My plot is on the edge of a green wedge area, on a local bus route to 2 large towns, one town having rail links. The site is also close to all facilities (post office, shops & schools within half a mile). Building on the plot in my opinion would enhance the area and blend in with existing properties.
Dep677	Mr Nigel Sheldon		705972	Object	<p>Land off Heol y Gors, Cwmgors (Site A)</p> <p>The Plan does not accord with Test CE1 because the policies do not necessarily flow logically from the strategic objectives of providing employment and housing land whilst maintaining distinctiveness of specific localities and communities.</p> <p>The overarching objectives of the Plan are to encourage economic growth, increased employment levels and sufficient housing through the allocation of land for such uses, whilst maintaining local "distinctiveness".</p> <p>For example economic development and housing development is not distributed evenly around the Borough and this Plan does little to further a more even distribution of business and housing development allocation. Due consideration is not therefore given to specific local requirements and opportunities for economic development and housing in specific areas including the Cwmgors locality and community. This is where the Plan fails to meet Test CE4 because of the inflexibility inherent in the Plan.</p> <p>The Cwmgors community has no apparent opportunity for the development of small or micro businesses which would provide local employment and</p>

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					<p>give local people the opportunity to go to work locally as a cost effective alternative to unemployment. The nearest commercial workspace is Cwmgors Industrial Estate, Gwaun-Cae-Gurwen, which is predominantly large industrial buildings and not well suited to small scale business use.</p> <p>Furthermore, the proposed housing development land appears to be focussed mainly on larger sites in specific areas of the Borough such as Neath and Pontardawe, which will restrict choice of housing types, tenure, and the location of suitable sites all across the Borough, which I understand is to do with encouraging housing in locations which are the main centres. This will result in the downward spiralling of locations such as Cwmgors if new development is restricted.</p> <p>Not everyone wants to live in these locations, which are alien to some people from the smaller communities such as Cwmgors. Small scale development in areas such as Cwmgors with revitalise the locality and stimulate the local economy.</p> <p>There needs to be more flexibility in location, house type, tenure and house prices. Not all housing sites should be so large that they are monopolised by the large house building companies with their "standardised" layouts and house types. A wide selection of development sites of all sizes will give much more choice to the consumer, and real competition in the market place which will keep prices at a level which is realistic for local people. It will also give opportunities for smaller scale developers, who are likely to be locally based and employing local people to get involved in housing schemes locally.</p> <p>Many local people leave their locality for university or work and subsequently return to raise a family. These people and those that stay in the locality want to live very close to family and friends to retain a sense of community and to benefit from local support networks, both for themselves and for elderly friends and relatives.</p> <p>The inability to purchase decent family homes in a specific location will mean that people will be forced to leave their close community and at best this will result in more traffic on the roads, and at worst the support networks will break down resulting in more pressure on State funded care for children and the elderly.</p> <p>Two areas adjacent to the existing development plan boundary have been identified, where the proposer considers small scale housing development or live-work units for small business and housing would be appropriate and could take place without detrimental impact on the openness of the countryside, or be considered unsustainable because both sites are close to the main A474 Ammanford to Pontardawe road with public transport readily available. The allocation of these sites would go some way towards addressing the problem of uneven distribution of new small business units and housing allocation around the Borough, by providing allocation for such uses in Cwmgors.</p> <p>The allocation of the sites for housing or mixed use housing and business use would encourage the generation of new small businesses in the locality, thus incentivising people to live and work locally.</p> <p>Site A is a small site intended to provide up to six modest dwellings or live-work units. Access to the proposed site will be via the existing access to Wrenvale Nurseries from the A474.</p> <p>All mains services are available locally to both sites.</p> <p>The inclusion of these sites in the new LDP will give more certainty about the amount of housing provision and the location where housing sites will arise rather than dependency on windfall sites in the area which cannot be accurately planned on a Borough wide basis.</p> <p>The allocation of these sites will allow the development of quality homes or live-work units in a location where few are currently put forward and this might help to develop new business and economic regeneration in an area desperate for employment opportunities. It is this flexibility that gives people the chance to start a business and to stay in a locality knowing they can develop their ideas and prosper without having to move away.</p> <p>The proposer requests that these sites are included in the land allocations for the Local Development Plan to go towards addressing the shortcomings of the current deposit LDP in the Cwmgors locality.</p>
Dep690	Mr Nigel		705972	Object	Land adjacent to Llwyn Nant, Cwmgors (Site B)

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	Sheldon				<p>The Plan does not accord with Test CE1 because the policies do not necessarily flow logically from the strategic objectives of providing employment and housing land whilst maintaining distinctiveness of specific localities and communities. The overarching objectives of the Plan are to encourage economic growth, increased employment levels and sufficient housing through the allocation of land for such uses, whilst maintaining local "distinctiveness".</p> <p>For example economic development and housing development is not distributed evenly around the Borough and this Plan does little to further a more even distribution of business and housing development allocation. Due consideration is not therefore given to specific local requirements and opportunities for economic development and housing in specific areas including the Cwmgors locality and community. This is where the Plan fails to meet Test CE4 because of the inflexibility inherent in the Plan.</p> <p>The Cwmgors community has no apparent opportunity for the development of small or micro businesses which would provide local employment and give local people the opportunity to go to work locally as a cost effective alternative to unemployment. The nearest commercial workspace is Cwmgors Industrial Estate, Gwaun-Cae-Gurwen, which is predominantly large industrial buildings and not well suited to small scale business use.</p> <p>Furthermore, the proposed housing development land appears to be focussed mainly on larger sites in specific areas of the Borough such as Neath and Pontardawe, which will restrict choice of housing types, tenure, and the location of suitable sites all across the Borough, which I understand is to do with encouraging housing in locations which are the main centres. This will result in the downward spiralling of locations such as Cwmgors if new development is restricted.</p> <p>Not everyone wants to live in these locations, which are alien to some people from the smaller communities such as Cwmgors. Small scale development in areas such as Cwmgors with revitalise the locality and stimulate the local economy.</p> <p>There needs to be more flexibility in location, house type, tenure and house prices. Not all housing sites should be so large that they are monopolised by the large house building companies with their "standardised" layouts and house types. A wide selection of development sites of all sizes will give much more choice to the consumer, and real competition in the market place which will keep prices at a level which is realistic for local people. It will also give opportunities for smaller scale developers, who are likely to be locally based and employing local people to get involved in housing schemes locally.</p> <p>Many local people leave their locality for university or work and subsequently return to raise a family. These people and those that stay in the locality want to live very close to family and friends to retain a sense of community and to benefit from local support networks, both for themselves and for elderly friends and relatives.</p> <p>The inability to purchase decent family homes in a specific location will mean that people will be forced to leave their close community and at best this will result in more traffic on the roads, and at worst the support networks will break down resulting in more pressure on State funded care for children and the elderly.</p> <p>The proposer has identified two areas adjacent to the existing development plan boundary where he considers small scale housing development or live-work units for small business and housing would be appropriate and could take place without detrimental impact on the openness of the countryside, or be considered unsustainable because both sites are close to the main A474 Ammanford to Pontardawe road with public transport readily available. The allocation of these sites would go some way towards addressing the problem of uneven distribution of new small business units and housing allocation around the Borough, by providing allocation for such uses in Cwmgors.</p> <p>The allocation of the sites for housing or mixed use housing and business use would encourage the generation of new small businesses in the locality, thus incentivising people to live and work locally.</p> <p>Site B is an extension to the land bank site (Ref HLB/23) which currently has the potential for 10 new houses. This additional site has the potential for up to a further six houses or live-work units. Access to Site B will be from the A474 via the cul-de-sac Llwyn-Nant.</p> <p>All mains services are available locally to both sites.</p> <p>The inclusion of these sites in the new LDP will give more certainty about the amount of housing provision and the location where housing sites will</p>

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					<p>arise rather than dependency on windfall sites in the area which cannot be accurately planned on a Borough wide basis.</p> <p>The allocation of these sites will allow the development of quality homes or live-work units in a location where few are currently put forward and this might help to develop new business and economic regeneration in an area desperate for employment opportunities. It is this flexibility that gives people the chance to start a business and to stay in a locality knowing they can develop their ideas and prosper without having to move away.</p> <p>The proposer requests that these sites are included in the land allocations for the Local Development Plan to go towards addressing the shortcomings of the current deposit LDP in the Cwmgors locality.</p>
Dep712	Ms Melanie Morgan		787332	Object	<p>Land adjacent to 262 Graig Road, Godre'r Graig</p> <p>I am writing to give my reasons to why I believe that the land adjacent to 262 Graig Road Godre'r Graig should be included in the development plan due to building:</p> <ol style="list-style-type: none"> 1. Affordable housing; 2. Environmentally friendly houses; 3. Energy efficient homes; 4. Solar panels; 5. There is a small community to keep locals in the community; 6. Walking distance to the primary school; 7. Walking distance to the parks; 8. Walking distance to the post office; 9. There are good bus routes; 10. Short bus or walking distance to local secondary school, swimming pool, leisure centre, doctor's surgery and chemist. <p>The plan is not coherent or flexible in that there is very little land for small scale developers. This prevents the plan from being flexible which stops any real re-invigoration of the valleys.</p>
Dep765		Tolkein Property Ltd	289531	Object	<p>Land at the Forge Washery Site, Lower Brynamman</p> <p>Amendment of the settlement limits around the Forge Washery site in order to include the proposed alternative site.</p>
Dep837	Ms Elaine Lewis	Tata Steel	667960	Object	<p>Tata Steel Site, Margam</p> <p>GVA has been instructed by Tata Steel UK Limited to prepare representations to the Neath Port Talbot County Borough Council Deposit Local Development Plan (2011 - 2026) consultation document, in respect of their land interests in the area.</p> <p>Neath Port Talbot County Borough Council (hereinafter 'the Council') has set out its vision, through planning policy, for the next 15 years identifying the extent of development in what it considers to be appropriate locations, as identified on the Proposal Map which accompanies the Deposit Plan.</p> <p>Tata Steel's land interests at Port Talbot extend to over 1000 hectares located approximately 1.5km to the southeast of Port Talbot itself. The Port Talbot Docks Industrial Area adjoins the site to the northwest as does Port Talbot Parkway station. The northeast boundary of the site is bounded by Heilbronn Way and directly beyond this lies Taibach, which largely consists of residential dwellings interspersed with leisure and commercial uses. The River Afan forms the site's northern and western boundaries over which there are numerous links into the Aberavon and Sandfields developments. These easily accessible areas provide a host of services and facilities that are within reach of, and generally support, the steelworks site.</p> <p>In addition, the site is in easy reach of the settlements of Margam and Baglan, with good public transport links and vehicular access to major transport routes such as the M4. Tata Steel is one of the largest employers within South Wales and has recently been investigating all options to increase competitiveness in a global market. Significant investment has already been made into the Port Talbot site (for example the rebuild of Blast Furnace 4 and construction of a Basic Oxygen Steelmaking off-gas waste heat recovery plant).</p>

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					<p>Tata Steel is keen to ensure that the Local Development Plan (LDP) provides the certainty, clarity and flexibility required to allow for the continued growth of its site operations, which are key to the economic prosperity of the County Borough. It is crucial that flexibility is built into the plans process allowing future scope to meet the development needs of the site for the LDP period; up until 2026.</p> <p>These representations are therefore made in respect of the failure of the Council to include the Tata Steel land holding within the defined settlement boundary for the Deposit LDP. In particular, attention is drawn to the requirements of Strategic Policy SP3 (Sustainable Communities) which defines the settlement hierarchy for the County Borough and identifies those areas which are the most sustainable locations and can more appropriately accommodate growth in terms of their function. This is further supported by Policy SC1 (Settlement Limits) which states that "Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the Settlement Hierarchy will be acceptable in principle." This policy goes on to list 12 criteria which seek to govern proposals for developments that fall outside the settlement limits. These are as follows:</p> <ol style="list-style-type: none"> 1. It constitutes a sustainable small scale employment use adjacent to a settlement limit; or 2. It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only; or 3. It constitutes the small-scale expansion of an existing business or the suitable conversion of an existing building; or 4. It constitutes the appropriate replacement of an existing dwelling; or 5. It is an affordable housing exception site; or 6. It is an appropriate rural enterprise dwelling; or 7. It is an appropriate 'One Planet Development'; or 8. It is a sustainable tourism or farm diversification proposal that is suitable in a countryside location; or 9. It is associated with the provision of public utilities, infrastructure and waste management facilities that cannot reasonably be located elsewhere; or 10. It is associated with either agriculture, forestry, minerals or energy generation; or 11. It relates to the appropriate provision of accommodation for Gypsies / Travellers; or 12. It constitutes the provision of Open Space and small scale ancillary facilities adjoining the settlement limit. <p>It is acknowledged that settlement limits are an important tool for managing and shaping the extent of the urban area, by defining the areas within which development which accords with the role and function of the settlement should be permitted in principle. They also allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy. With this in mind and taking these criteria into account in respect of the steelworks site, it is considered that there is insufficient flexibility to accommodate Tata Steel's future expansion needs in the event that the site were to remain outside the settlement boundary and the criteria outlined in Policy SC1 were to be applicable to future planning applications.</p> <p>As the Deposit LDP currently stands, the Tata Steelworks site remains outside the settlement boundary and is unallocated for any specific purpose. As Officers of the Council are aware, the Port Talbot site is an integrated steelmaking site using imported raw materials. In April 2010, the Applicant commissioned a £60m energy efficiency scheme at the Port Talbot site, involving the capture and reuse of gas from the Basic Oxygen Steelmaking (BOS) plant. This was followed by a £50m scheme to re-use waste heat on the same site which was fully commissioned in early 2013. These are just two examples of continued major investment into the Council's administrative area, which will continue into the future.</p> <p>In view of the likelihood of continued investment into this site, it is paramount that Tata Steel receives the utmost support from the Council in relation to development plan policy.</p> <p>As it stands, the steelworks site meets the definition of previously development land (PDL) as outlined in Planning Policy Wales Edition 5 (November 2012), given that it is occupied by permanent structures and fixed infrastructure which enable the operations of the steelworks and associated facilities contained therein. In view of the level of development at the site, its sustainable location in close proximity to existing settlements and the commitment to continued growth, there is robust reasoned justification for the site to be included within the urban settlement boundary.</p> <p>The site is a major employment generator for the County Borough and the remainder of South Wales. There are various operations currently being undertaken on the site and the need to be able to quickly adapt to economic, environmental and social global changes to maintain competitiveness is a foremost objective of the organisation. For these reasons, and in order to avoid unnecessary stifling of development, the site's inclusion within the</p>

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					<p>settlement limits would ensure that future planning applications will be determined against the most appropriate planning policy context in the quickest possible timeframe.</p> <p>We are also mindful that the LDP period extends until 2026, which is a considerable time period that could see numerous changes within the operational requirements of the Steelworks site. In addition, there are likely to be various personnel changes within the Planning Department of the County Borough over the Plan period. This could lead to uncertainty over the future determination of planning applications resulting from the planning policy context that would be applicable to the site in the event that it were to remain outside the settlement boundary. Whilst verbal reassurances from Officers are welcomed by Tata, this does not necessarily provide sufficient protection for the future operational development of the steelworks site.</p> <p>The exclusion of the entirety of the steelworks site from the settlement boundary, which is a major employer and growth area, is considered to be a shortfall of the LDP, which will ultimately result in the plan being found to be unsound by the Inspector on the basis that it fails tests of soundness C1, C4, CE1 & CE4.</p>
Dep841	Mr Graham Morris		333314	Object	<p>Land between Maes y Berllan and rear of Min y Coed, Glynneath</p> <p>I consider the LDP to be unsound in parts and not fully meeting the tests as described at C4, CE1, CE2 and CE4 in the Deposit LDP Representation Form.</p> <p>My general concern relates to the settlement of Glynneath and the lack of land allocated to, and available for:</p> <ul style="list-style-type: none"> • Affordable small scale self-build development; and • Executive type housing development. <p>My specific concerns relate to Candidate Site NV2 within Glynneath and the reasons why it has been rejected as part of the LDP.</p> <p>In a nutshell I believe that the settlement boundary of Glynneath is too tightly drawn within the LDP (the Plan) resulting in an insufficient allocation of land for small scale affordable self-build plots and executive housing development. It is my strong view that this will not allow Glynneath as a community to reach its full potential in terms of social and economic growth over the 15 year period of the Plan.</p> <p>Section 7.04 (objectives) of the Settlement Paper states:</p> <ul style="list-style-type: none"> • <i>"In addition, the following two area based objectives have been developed. Reinvigorate the valley areas and improve economic prospects, recognising the role of Glynneath and Pontardawe in delivering sustainable growth".</i> <p>In my view the Plan as it stands does not go far enough to help enable and ensure that Glynneath is reinvigorated. I detail the reasons for this below.</p> <p>The research and analysis undertaken by the LDP team is generally thorough and I recognise that they have had an unenviable task in putting together such an enormously wide ranging Plan. Whilst there is a commitment to the social and economic development of Glynneath within the Plan, and this is to be applauded, I do not consider enough thought has been given to outcomes as regards small scale housing and executive type development.</p> <p>Section 5.05 (Summary of Consultation Responses) of the LDP Settlement Paper states:</p> <ul style="list-style-type: none"> • <i>"There is a need for more building plots within settlement limits that are able to accommodate 1 or 2 houses and there is a shortage of executive housing. Failure to allow the development of more potential single building plots will serve to dramatically worsen the position over the Plan period".</i> • <i>"Adequate provision should be made within the LDP for small scale house building that would be carried out by local developers to meet localised demand. Settlement boundaries should be drawn realistically to accommodate these opportunities".</i> <p>Despite the consultation these responses appear to have not been taken fully into consideration in the LDP and it is not clear why this is so. In this respect it has to be said that LDP policies and allocations do not logically flow nor can they be said to be founded on a robust and credible evidence base as it would appear, certainly in relation to Glynneath, that these consultation responses have been ignored.</p>

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					<p>The allocations of land for the certain types of housing as I describe are not sufficient or realistic and could actually contribute to the stagnation and decline of Glynneath as a valley town, district centre and community over the next 15 years. I do not feel enough attention has been given to understanding or appreciating the full needs of the Glynneath area in this regard and the resultant LDP allocations and outcomes are really very disappointing.</p> <p>Historically there has always been a severe shortage of self-build and executive type housing development within Glynneath caused by lack of available building plots and this has been overlooked in the UDP and now the LDP. In other areas of the valleys within NPTCBC planners have encouraged and allowed development of self-build and executive type housing plots as evidenced in Bryn, Clyne and Crynant. Glynneath should not be treated any differently. There is inconsistency in the LDP in this respect.</p> <p>Whilst the plan recognises that Glynneath needs better quality housing when you look at the potential building land suitable for small scale building plots within the LDP settlement boundary it is almost impossible to find any. I built my own home at Maes y Berllan in Glynneath almost 30 years ago and even then it took me 6 months to proactively find a suitable plot. The situation has been chronic ever since and in 2013 people here still do not have a sufficient choice of affordable land on which to self-build or of high end quality executive housing.</p> <p>In the autumn of 2012 I undertook some research in this respect, as further evidence to support my candidate site submission NV2 and e-mailed it to the LDP team. This is what the local estate agents said in response to my enquiries about the availability of building plots in Glynneath. The specific question I posed was:</p> <ul style="list-style-type: none"> • "I am wondering whether you have any individual building plots for sale within Glynneath, near Neath. Please supply details. Note that I am only interested in Glynneath itself. How often do building plots come on the market in Glynneath itself? Many thanks". <p>Responses:</p> <ul style="list-style-type: none"> • <i>Peter Alan "We don't get many plots come up in Glynneath that often". Only one plot available at Heol y Glyn £99,995. (In my view this plot is well overpriced being on a busy, noisy inter valley main road, not an attractive option to most people).</i> • <i>Peter Morgan "We currently have a building plot in Resolven but none in Glynneath".</i> • <i>Astleys "Unfortunately we do not have any building plots available in Glynneath, only Cwmgwrach. If any plots become available I will contact you". (I have had no contact since)</i> • <i>Clee Tompkinson Francis "We've had 2 plots in the last two years. I had a phone enquiry last week with a view to valuing the plot in the Glynneath area. If we are successful in getting this listing I will let you know." (I have had no contact since).</i> <p>I have this e-mail evidence available if required for inspection.</p> <p>For the size of Glynneath with around 3,500 residents, it can be seen that the number of building plots available, only one in the autumn of 2012, is abysmally low.</p> <p>The lack of such housing in the area prevents residents with the necessary financial resources moving up to a higher quality of home within Glynneath. The end result is that some residents are denied the opportunity to build, or move to, their dream homes and move elsewhere to achieve their objectives. This has a negative impact on the social and economic well-being of Glynneath as more affluent and professional people move away from, or are not attracted to move into, the area. It also results in a lack of individually designed housing stock.</p> <p>The effect of not increasing settlement boundaries severely reduces flexibility and constrains development as regards the provision of land for the need I describe. The impact for Glynneath is potentially serious as a stranglehold is effectively being placed on future potential development and economic growth. Large areas of Glynneath within the settlement boundary are, according to the Environment Agency, liable to flooding and this places further constraints on development.</p> <p>Section 9 (Strategy) of the Settlement Paper states:</p>

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					<ul style="list-style-type: none"> • <i>"When considering revisions to settlement limits the Council will fully consider the requirements of National Policy in respect of issues such as flooding, nature conservation, previously developed land etc. It will also ensure that sites are well served by infrastructure and would not impose unacceptable pressures on local communities or its linguistic balance".</i> <p>Logically this suggests that settlement boundaries should be increased to compensate for the inability to develop areas of land within an existing settlement. Yet this has not been done for Glynneath. It has to be argued that the allocations for housing development do not reflect this or logically flow from the findings.</p> <p>When the latest settlement boundary is compared to the UDP settlement boundary it can be seen that the settlement boundary for Glynneath has not been extended at any point. In fact the LDP settlement boundary has been tightened, effectively reducing the land available for development. Clear evidence of this exists on land between the B4242 and the Ynys Cadwyn housing estate that under the LDP is no longer available for housing development.</p> <p>Whilst there is provision for larger scale housing developments within the LDP there are no defined areas for the smaller scale self-build and executive type housing developments that are very much needed. Indeed for the whole of the Neath Valley the LDP contains provision for 85 houses on small sites (less than 10 houses) for 8 communities. The major problem here is that the 85 allocation is for the whole of the Neath Valley and it is not obviously possible to allocate numbers to each of the 8 communities the spatial area contains. Assuming that the population of Glynneath roughly equates to the total of all the other 7 communities' populations then Glynneath should be entitled to 43 of the 85 units allocated. Over the 15 year period of the Plan then this is an average of 3 houses, which I would regard as entirely for self-build or executive housing, a year. This level of allocation is very obviously inadequate for an important hub district town of around 3,500 residents.</p> <p>There are obvious errors within the LDP - Page 122 Table G2.</p> <ul style="list-style-type: none"> • Glynneath shown as served by a mobile library when it has a permanent library. • Glynneath shown as not having a doctor's surgery when it has a permanent doctor's surgery. <p>These are fundamental errors, the final settlement paper does not appear to have been thoroughly proof read or the research has been inadequate.</p> <p>Having lived in Glynneath for 56 years then I feel I know the area well and have considerable local knowledge. I have looked in depth at the LDP settlement boundary plan and the potential single / small scale building plots / sites within the settlement limit and I struggle to find no more than two that might accommodate two houses. This suggests that during the 15 year life of the Plan there is very little potential to develop any self-build plots in Glynneath. This cannot be just or fair. It is no use suggesting that larger scale sites allocated to housing within Glynneath, such as the Park Avenue site for 150 houses, featured in the Plan will meet all need or demand for all types of housing. In general, the owners of such large sites have no interest in selling land for individually designed affordable self-build plots; rather they will sell land for the highest amount and developers will cram in as many new houses as possible on such sites. The usual way for a self-builder to design and build his/her own home is to purchase a single building plot and these by their very nature of design tend to be of a larger size than plots found on housing estates.</p> <p>The policy on extension of settlement limits defined within the plan at section 9.0.2 states (in part):</p> <p><i>"Development within settlement limits that is proportionate in scale and form to the role and function of the settlement as set out in the settlement hierarchy will be acceptable in principle.</i></p> <p><i>Outside settlement limits, development will only be permitted under the following circumstances:</i></p> <ol style="list-style-type: none"> 1. <i>It constitutes a sustainable small scale employment use adjacent to a settlement limit or;</i> 2. <i>It constitutes live-work unit(s) immediately adjacent to a settlement limit in the Valleys Strategy Area only" .</i> <p>This policy is absolutely rigid and cannot be regarded as being flexible in relation to small scale housing use adjacent to settlement limit. It allows, quite rightly, for development of sustainable small scale employment but fails to mention sustainable small scale housing. Circumstances will undoubtedly change over the 15 year period of the plan but such rigidity removes any flexibility of approach.</p>

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					<p>Yet flexibility of approach is emphasised within the Plan. Section 6 (Issues to be addressed) of the Settlement Strategy states:</p> <ul style="list-style-type: none"> <i>"Pontardawe and the Upper Neath Valley will be identified as strategic growth areas in the valleys in order to create a mechanism to coordinate investment and ensure the benefits of growth and regeneration are shared more widely throughout the valley communities; and a flexible approach to development will be applied in the valley communities".</i> <p>I have referred enough to my general concerns and will now move to my specific concerns in relation to Candidate site NV2. Obviously I have a vested interest here as an owner and potential developer of the site.</p> <p>-----</p> <p>I first approached Neath Port Talbot CBC about the possible development of land in front of my house at Maes y Berllan, Glynneath that I own outright for 2 houses, as far back as November 2005. Planning permission had been granted to build Maes y Berllan on 12th May 1983 (code number 2/3/83/0299/01). I thought that the 2 houses could be seen as straightforwardly as an infill development and it came as a considerable surprise to learn that the settlement boundary for Glynneath was drawn behind Min y Coed, Glynneath and that Maes y Berllan was regarded as being in open countryside. It would appear that planning policies had changed since 1983 but despite my enquiries NPTCBC planners have not confirmed that Maes y Berllan was or was not within the settlement boundary when its planning permission was granted. I am unable to establish whether the settlement boundary has been pulled back to behind Min y Coed at some point or whether it has always been there (since 1983).</p> <p>It became clear after further correspondence with NPTCBC planners that if I applied for planning permission for 2 houses this would be refused as such development would be seen as being in open countryside and contrary to planning policies. In 2008 I became aware of the LDP process and decided to submit my proposal as a Candidate Site in 2009.</p> <p>I have tried to work with NPTCBC planners since 2005 and patiently followed the LDP process so you can imagine my utter dismay when I learned that my Candidate Site NV2 had been rejected by the LDP team. I have given considerable thought to the reasons given for this in the LDP Candidate Site Assessment Report. The site was filtered out at stage 2, reasons given as follows:</p> <p><i>" Appraisal : This site was considered an intrusion into the open countryside and as such, it would be contrary to the settlement strategy. Access is problematic and the site lies within EA C2 flood zone which is identified in TAN 15 as unsuitable for vulnerable uses as it is susceptible to flooding. The site also contains areas of significant biodiversity value and is highly likely to support protected species.</i></p> <p><i>Decision : exclude from settlement limit".</i></p> <p>I subsequently wrote to the LDP team to seek further clarification. I sought answers to the following questions. The response I received from the LDP team are shown in italics after each question.</p> <p>[1] How have you reached the conclusion that the site contains "areas of significant biodiversity and is highly likely to support protected species"? What evidence exists to support this statement? Has a detailed biodiversity survey of the site been carried out? If so, please provide details. What is/are the protected species you think is/are supported on the site? Again please provide details. Are you working on assumptions here?</p> <p><i>An ecological survey remains on file that was carried out in 2009. As this is on file and may contain some sensitive information you would have to formally request sight of this via a Freedom of Information request and be mindful that the more sensitive information that these reports sometimes contain would be extant (extracted?) from that which is shown to you.</i></p> <p>[2] What do you mean by "access is problematic"? Are you able to be more specific?</p> <p><i>The access issues relate to both gaining access into the site and any damage that may occur to biodiversity and the manner in which vehicles may find the junction with Min-y-Coed particularly when on-street parking obscures a driver's vision when turning right out of the lane.</i></p> <p>[3] How reliable is the EA flood zone data? Is it an issue I should take up with the Environment Agency rather than yourselves? Can I challenge the soundness of the Plan if I believe flooding assumption information supplied to/used by the LDP team is seriously flawed?</p>

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					<p><i>From the Planning Authority's perspective we take NRW (as it is now called) data as a reliable source and therefore TAN 15 must be complied with.</i></p> <p>[4] For the purposes of the plan how is "open countryside" defined? Is this open to interpretation or is there a specific meaning?</p> <p><i>Open countryside is quite simply land not within the settlement limit.</i></p> <p>[5] Are there any changes proposed to the Glynneath settlement boundary in the Plan? If so where and why are these changes proposed?</p> <p><i>The changes in the settlement limit are those contained within the proposals map and hopefully the strategies should go some way to justify where there have been changes to the boundary of the UDP if one were to compare the two. It must be said though that the LDP is a Plan in its own right and is by no way an evolution of the UDP.</i></p> <p>I do not believe the reasons for rejection of Candidate Site NV2 are entirely founded on a robust or credible evidence base.</p> <p>[1] The majority of the site has been cultivated since 1987 and is largely used as a garden to my home at Maes y Berllan. The bottom area was cleared and levelled by an excavator machine around 1990 and a large flat lawn created and maintained thereafter but this has subsequently become overgrown. In my view with my detailed knowledge of the site (as I live on it and garden most of it) then I challenge the LDP team's assumptions that the site should be regarded as one containing areas of significant biodiversity and one highly likely to support protected species. In the 27 years I have lived at Maes y Berllan I have never encountered any protected species whilst cultivating gardens on the site. The LDP team refer to biodiversity / ecological survey being carried out in 2009 but I maintain such a survey has not been carried out on the specific site NV2 as I have never given permission to anyone to enter the site and conduct such a survey. The ecological survey is not readily available for inspection and could apparently contain sensitive information that would never be shared with me. I believe that the survey was largely focused on land at the rear of houses numbered 55-89 Morfa Glas, land that is some 300m from my site NV2 and land that has not been farmed for around 50 years and understandably may well contain areas of significant biodiversity and protected species.</p> <p>In 2011 the LDP team wrote to me to invite me to submit my site for the LDP (see photocopies of the letters attached). Why bother with this invitation if the ecological survey carried out some 2 years earlier indicated significant areas of biodiversity and protected species? Whilst I do not doubt the existence of the 2009 ecological survey it cannot contain specific evidence relating to site NV2 as no person has accessed the site to conduct a survey. It is my firm belief that the LDP Team has reached their conclusion in respect of rejecting site NV2 based on assumptions and that there is no robust or credible evidence to support the statement in the LDP deposit plan that site NV2 contains areas of significant biodiversity and is highly likely to support protected species.</p> <p>[2] The issue of access from the site NV2 is one that could easily be overcome by prohibiting vehicles turning right out of the lane. A left only turn would simply overcome the LDP team's concerns. In any event I do not feel that a perceived problematic access alone is justification to reject the site particularly when measures could be considered to alleviate any issues. There is a similar access issue at the rear of Park Avenue, Glynneath onto a much busier main road where NPTCBC planners have in recent years granted planning permission at the Old Welfare Hall site for 17 houses. I am sure other examples of inconsistency of approach to determining planning permissions exist.</p> <p>[3] The inclusion of site NV2 in a flood area is quite frankly absurd. The site is sloping and lies well above Min y Coed. The brook that the EA think would cause flooding, which does lie adjacent to part of site NV2 is contained within a deep masonry lined channel. In the 30 years I have lived at Maes y Berllan this brook has never flooded onto my property. The masonry lined channel has been built to ensure that the brook flows quickly away. If the brook was ever to overflow this breach would occur further down in the vicinity of the bottom of Llygad yr Haul, Glynneath where breaches have occurred in years gone by. Even if large areas flooded in that vicinity it would be impossible for flood water to reach site NV2 due to the topography of the area. Maes y Berllan and the site NV2 are elevated. I recognise the LDP team has accepted the NRW flood zone report in good faith here but where this is challenged and questioned, as in my case, then some mechanism or process must exist establish the true position or appeal the decision.</p> <p>[4] The suggestion that there is intrusion into open countryside and the definition of open countryside given does not make sense. How can it be said that there is intrusion into open countryside when planning permission was given for Maes y Berllan as recently as 1983? The planning authority couldn't have regarded the site as being in open countryside then or else planning permission would have been refused outright. Originally a cottage, known as Maes y Berllan, existed on the site, in the same position as the new Maes Y Berllan, from circa 1830 to 1950 when it was demolished. It could be argued that historically the site with a residential property thereon has been part of the community of Glynneath for around 200 years and logically that it should</p>

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					<p>be accepted as being within the settlement limit.</p> <p>[5] I have subsequently established the settlement limit for Glynneath has not been extended at any point during the formation of the LDP.</p> <p>In summary I believe Candidate Site NV2 is a suitable site for much needed affordable self-build housing development and I challenge the LDP team's conclusions. My general concerns about the LDP, as outlined earlier, apply to Candidate Site NV2 as do my specific concerns as outlined above.</p> <p>Indeed it would have been logical for NPTCBC as the Planning Authority having granted planning permission for Maes y Berllan as recently as 1983 to have included it in the settlement limit for Glynneath at some point. If this had been done then this long convoluted eight year process of trying to have the site accepted for development and included within the LDP could have been avoided and planning permission could have been considered for the 3 houses as infill development.</p> <p>I hope you will understand just how frustrated I feel. I appreciate the time that has been taken in reading my submissions. I wish I could have been more succinct, and I have tried to be so, but I felt it important that as many points at issue are covered as this would appear to be once in a 15 year opportunity to redress what I consider to be a grossly unfair decision.</p>
Dep845	Ms Betsy Jeffreys		786613	Object	<p>Land off B4242, Pontneathvaughan</p> <p>I want my land to be considered as the LDP is not flexible and not coherent and is therefore not sound. Too many houses are in the Valleys in big sites and hardly any/none in the Valleys.</p> <p>Land is there for the large builders only. For villages to survive like Pontneathvaughan builders should be allowed to build- this will reinvigorate the Valleys as is says in the vision.</p> <p>Some 46 years ago the land had permission for 2 dwellings. My husband and I built but a family member held onto the land. Now it is in my ownership and I am keen to build.</p>
Dep930	Councillor Des Davies		788355	Object	<p>Land adjacent to 2B Lletty Dafydd, Clyne and land adjacent to 1, Lletty Dafydd, Clyne (Both plots at the Resolven side of 2b & 1 Lletty Dafydd)</p> <p>I would like to object on the following grounds:</p> <p>(1) Vision to the right and left of both plots is extremely limited.</p> <p>(2) Driving from Neath to Resolven cars and even buses travelling towards Neath are invisible for a time in the dip.</p> <p>(3) Driving Resolven to Neath there is a blind spot were a driver cannot see on coming traffic.</p> <p>(4) Generally there are land drainage issues with both sites.</p> <p>(5) The land adjacent to 1 Lletty Dafydd is full of springs and is made up ground as a result of work the former "Roadforce" organisation carried out there some years ago.</p> <p>(6) Both plots form a natural break between Clyne and Melin Court.</p>
Dep1255	Mr P Lloyd-Jones	Cwmllynfell Community Council	196349	Object	<p>Settlement of Penrhiwfawr</p> <p>I refer to previous communications in connection with the Deposit Local Development Plan in which the Councils concerns about the lack of a defined settlement limit for Rhiwfawr have been raised. The Council has considered the matter and has decided to object to the Deposit Local Plan in its present form.</p>
Dep1295	Mrs J		457958	Object	<p>Glyncastle, Resolven</p>

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	Owen				<p>The settlement boundary should be amended to incorporate Glyncastle and/or settlement limits should be drawn around dormitory settlements.</p> <p>There is no justified reasoning for not incorporating the settlement of Glyncastle within the Resolven settlement boundary and designating it as part of the Special Landscape Area. Paragraph 5.3.11 of Planning Policy Wales states that non-statutory designations such as Special Landscape Areas should be soundly based on a formal, scientific assessment (my emphasis) of the nature conservation, landscape or geological value of the site. No such assessment has been undertaken by Neath Port Talbot County Borough Council and the nature conservation, landscape and geological value of Glyncastle has not been established.</p> <p>A preliminary ecological appraisal undertaken in connection with a proposed residential development at The Rise, Glyncastle in September 2012 concluded that development on the site could proceed without any adverse impact on protected species and furthermore, that the nearest statutory nature conservation site lies approximately 6.2km north east of Glyncastle (Cwm Gwrelych and Nant Llyn Fach SSSI). The boundary of the Special Landscape Area has been drawn arbitrarily without any robust assessment of Glyncastle being undertaken. The designation, therefore, is not consistent with national planning policy set down in Planning Policy Wales (Consistency Test C4).</p> <p>Whilst the designation of Glyncastle as a "dormitory settlement" is not supported, if the Inspector considers dormitory settlements to be an appropriate concept within the settlement hierarchy, then the settlement boundaries of dormitory settlements across the County Borough should be identified on the Proposals Maps. This would allow for flexibility in such settlements to deal with changing circumstances (Coherence and Effectiveness Test CE4).</p>
Dep1296	Mr John W John		782842	Object	<p>Land at Oakwood, Pontrhydyfen</p> <p>The inclusion of my site would be rounding-off in terms of shaping the village at this location.</p> <p>Our land is at the edge of and adjoining the village of Oakwood, it is also adjoining our house and garden. Cwmavon and the surrounding area is considered part of a major focus for house building.</p> <p>While one of the key aims of the Plan is to identify sites suitable for housing, it appears that only sites of more than ten homes are considered. The Plan does not seem to include small sites for 1 or 2 homes.</p> <p>The settlement topic paper points to the fact that land adjoining an existing settlement (which this does) should be considered. Reinvigoration is also a consideration, building two houses here would certainly accomplish this. Adjoining the road into the village and having all utilities in the road or on site would add to the sustainability of the village.</p> <p>Development of this small area would not impact on the natural heritage and would enhance and help reinvigorate the village, increase the visual amenity and attractiveness of the existing settlement.</p> <p>The site is within walking distance of public transport, walking and cycling routes and is co-located with other facilities and services such as a school, village hall, children's playground, rugby and sports playing field and local shops. It is also within walking distance of the Afan Argoed Country Park.</p> <p>The summary to the settlement topic paper further points out: More plots for 1 to 2 houses are needed and the failure to provide this will dramatically worsen the position over the Plan period. This need is also highlighted in the valley settlements, as is the point that settlement boundaries should not be drawn too tightly around smaller communities.</p> <p>If our site were included in the LDP our intention is to remove the old garages which we own, then level the site and fill the dismantled railway cutting with recycled material to bring it substantially up to the level of the rest of the site thus providing a garden area.</p> <p>We would then if planning permission is granted, build two houses and landscape the site.</p>
Dep1313	Mr Cledwyn Edwards	Tonmawr Rugby Football Club	588833	Object	<p>Land to the East of Tonmawr RFC Club House, Tonmawr</p> <p>We wish to see the site included within the settlement limits (Policy SC1 and Proposals Map) and subject to a housing land allocation under Policy H1. The future development potential of the land, which was identified within the UDP settlement limits, needs to be safeguarded, as a future housing</p>

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					<p>scheme would not only provide a range and choice of new dwellings and contribute to the regeneration of the village, but receipts from the sale of land would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches.</p> <p>1.0 INTRODUCTION</p> <p>1.1 These representations are submitted on behalf of Tonmawr Rugby Football Club (RFC) who are promoting land for development on their existing clubhouse site together with open land to the east. It is disappointing that, while the clubhouse site remains within settlement limits in the Deposit Local Development Plan, land to the east, which is within the Club's ownership, and which is included within the current adopted Unitary Development Plan boundary, is proposed to be excluded.</p> <p>1.2 We are also aggrieved that, despite the requirements of the Local Development Plan process to engage with key stakeholders, Tonmawr RFC were not consulted at any previous stage of the Plan process regarding the decision to exclude the land.</p> <p>1.3 Tonmawr RFC represent a key organisation in the village, which caters for young people, provides community facilities in the club house (there is no pub), and allows the nearby primary school to use its pitches.</p> <p>1.4 The future development potential of the land concerned needs to be safeguarded, as a future housing scheme would not only provide a range and choice of new dwellings and contribute to the regeneration of the village, but receipts from the sale of land would enable a new combined indoor training facility and clubhouse to be constructed on land adjacent to the pitches.</p> <p>1.5 Section 2 of this submission describes the site. Section 3 provides representations on the Plan Strategy; Section 3 discusses the Overarching, Area and Topic Based Policies; Section 5 discussed the Sustainability Appraisal Self Assessment; and Conclusions are made in Section 6.</p> <p>2.0 SITE DESCRIPTION</p> <p>2.1 Location</p> <p>Tonmawr is a former coal mining village lying some 4 kilometres east of Cimla, 6 kilometres east of Neath Town Centre and some 1.5 kilometres north of the linear settlement of Efail Fach/Pontrhydyfen. In the Deposit LDP - Settlement Topic Paper (August 2013), under the Afan Valley Spatial Area, Tonmawr is described as : 'a sizeable settlement located north-east of Efail Fach. It offers a good range of community facilities as well as local business premises for employment uses.</p> <p>2.2 Site Description</p> <p>The site has an area of 1.98 hectares and lies to the south of Tonmawr Road, an unclassified road which joins the B4287 Road at Efail Fach. The site comprises two distinct parts, the Rugby Club site, with the club building and associated car park and grassed areas, and the open land to the east.</p> <p>2.3 An access is achieved from Tonmawr Road some 40 metres north of the Club building which also serves the adjacent Community Centre. To the north is a stream, the Afon Pellena. The northern boundary of the site has been drawn to exclude an area of flood risk associated with the stream.</p> <p>2.4 The land to the east has a moderate slope upwards to the south-east where it bounds a forestry track now also used as a recreational route. The site comprises bracken and scrub and is bounded to the north and east by large mature trees, a mixture of broad leaved and conifer species.</p> <p>3.0 REPRESENTATIONS ON THE PLAN STRATEGY</p> <p>3.1 Section 2 - The Strategy is supported , in particular the Area Based Objective OB6 , i.e. 'Reinvigorate the Valley Areas and improve economic prospects recognising the role of Glynneath and Pontardawe in delivering sustainable growth.'</p> <p>3.2 Objective OB7, which seeks to 'Provide an adequate supply, mix type and tenure of housing within sustainable settlements to meet the needs of the</p>

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					<p>projected population' is also generally supported.</p> <p>3.3 The Spatial Strategy, which influences the distribution of growth "focuses new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities." As such it is intended to focus the majority of development along the M4 corridor and in the urban areas of Neath and Port Talbot. It is recognised that the economic-led growth strategy will result in the majority of housing (8,000 new homes) and employment (3,850 new jobs) land being concentrated in the coastal area.</p> <p>3.4 Paragraph 2.5.3 refers to a more flexible approach to development in the Valleys compared to the coastal corridor, which will help to invigorate communities. Paragraph 2.5.4 states that the settlement strategy is a fundamental mechanism, identifying communities that have the sufficient capacity and resources to accommodate development within designated boundaries.</p> <p>3.5 Whilst the above elements of the Plan can be considered sound, the means by which these aims are intended to be achieved are disputed. We shall therefore elaborate in our following comments on the Overarching and Topic Based Policies</p> <p>4.0 REPRESENTATIONS ON OVERARCHING, AREA AND TOPIC BASED POLICIES</p> <p>4.1 Despite the provisions in the Settlement Strategy which relate to the need for flexibility in the Valley areas, in the case of Tonmawr, the potential for such flexibility has been diminished by the 'drawing in' of settlement limits and the consequent reduction of land which is capable of providing for much needed growth in a community acknowledged in the Settlement Topic Paper as having a good range of community facilities. These include a shop/post office, primary school, hourly bus service (159 - Neath to Blaengwynfi), community centre, employment uses, and as a focus for the community, the rugby club. The club is very much the focal point of the local and wider community not only providing facilities for rugby but also numerous other activities. Many organisations use the facilities for a variety of activities, i.e. school's sport's days, village fayre, Community First activities, PTA fund raising activities, BBQ's, ladies & male choirs, senior citizens, church. Many charity events, fundraising events are held at the clubhouse and playing fields contributing to an energetic community spirit.</p> <p>4.2 In terms of Overarching Policies in Section 3, Policy SP3 (Sustainable Communities) which includes Tonmawr as a 'Small Local Centre' is acknowledged. The site being promoted, however, is not included within the settlement limits as identified on the Proposals Maps. Policy SC1 (Settlement Limits), and the Proposals Map are consequently objected to.</p> <p>4.3 Whilst Policy SC1 gives criteria for various uses outside the settlement boundary, we suggest that Criterion 12 is amended to include the revised text highlighted below in order to make future provision for facilities close to the existing pitches: 12. It constitutes the provision of Open Space and (small scale) ancillary facilities for existing recreation uses adjoining the settlement limit.</p> <p>4.4 As the combined club house site and land to the east is capable of accommodating a development in excess of 10 dwellings we also object to its non inclusion as a housing land allocation under Policy H1 in Section 5 - Topic Based Policies.</p> <p>4.5 It is noted that no new housing allocations are proposed in the Afan Valley area (Table 5.3) with only allowances for windfall and infill developments which amount to some 1.4% of the total housing development proposed in the County Borough as a whole.</p> <p>4.6 This is clearly inadequate, as in the other valley areas such as the Neath Valley, future growth is inked directly to tourism and employment initiatives. The Afan Valley has a growing reputation for cycling and other activities and provision should be made for appropriate development which will be attracted by the raised profile of the area. Various recreational initiatives, such as that proposed by Tonmawr Rugby Club, will also build on the leisure and tourism offer of the area.</p> <p>4.7 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p>

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					<p>5.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE</p> <p>5.1 A Sustainability Appraisal of the site, using the Council's 'Traffic Light' methodology is included.</p> <p>5.2 This shows clearly that there are 10 positive scores, two neutral scores and one 'not applicable'. There are no negative factors identified. Clearly the benefits of developing the site would considerably out-weigh any negative factors. This points to a sound argument for seeking the site's allocation for housing.</p> <p>5.3 Table D.2 of the LDP Settlement Topic Paper shows that 12 services and facilities exist in Tonmawr which compares positively with other settlements, and bears out the findings of the Sustainability Appraisal.</p> <p>5.4 One factor which my clients have considered which could have contributed to the removal of the site from development limits is the fact that it has not emerged to date since the Unitary Development Plan was adopted.</p> <p>5.5 The undeveloped land was originally purchased from the Forestry Commission subject to a covenant restricting the future use to recreation or agriculture purposes. Recent discussions have been held with the NRW, who have responded positively to the modification of the covenant, subject to a proportion of the development value of the site.</p> <p>6.0 CONCLUSIONS</p> <p>6.1 This Submission has been prepared on behalf of Tonmawr Rugby Football Club who are promoting land for residential development. This includes the current club house and undeveloped land to the east which is included within the current Unitary Development Plan Settlement Limits for the village.</p> <p>6.2 In the Deposit Local Development Plan, however, the land to the east is not favoured for development. My clients are disappointed in this context that, despite the LDP process aiming to be transparent with comprehensive stakeholder involvement, they were not consulted on the decision to remove the land from the village settlement limits.</p> <p>6.3 Consequently we wish to object to the land to the east of the club house not being included within the village settlement limits and we object to the whole site's non inclusion as a housing land allocation. We also suggest revised wording to Policy SC1 in order to allow for the future relocation of the club house with ancillary recreational facilities, in the form of an indoor training area/gymnasium.</p> <p>6.4 It is intended that receipts from the sale of the land for housing would finance such a new facility on land adjacent to the current rugby pitches. There would thus be significant benefits to the community and the regeneration of the area.</p> <p>6.5 A Sustainability Appraisal, using the Council's own methodology has established that positive benefits of allocating the site would far outweigh any negative aspects. As such we consider that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>6.6 We therefore urge the Council to respond in a positive way by including the site in any future Focused Changes to the Plan.</p>
Dep1326		Natural Resources Wales	748015	Object	<p>It is submitted that the site shown on the attached plan, which comprises 2.2 hectares, should be allocated for housing in the LDP. It is also submitted that the settlement boundary from the UDP should be re-instated and extended to include this site.</p> <p>The site falls within the Valleys Strategy Area, where the Council plan to re-invigorate the Valleys. The allocation of this site for housing would be compatible within this strategic aim.</p> <p>SP7 identifies a dwelling requirement of 9,150 units, based on an estimated increase in households of 8027 over the plan period, which is significantly lower than the latest Welsh Government (2008) Household Projections of 10,000 households. This is a significant departure which is not justified by the</p>

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					<p>supporting evidence base.</p> <p>Although the site falls outside of the settlement limit, it is close to existing settlement limits and adjoins existing residential development to the south and west. To the east and the north the site adjoins areas of forestry.</p> <p>The site falls within an extensive Special Landscape Area, but its development for housing would not have a significant adverse impact upon the Special Landscape Area as a whole.</p> <p>The allocation of this site would support the Welsh Government's commitment to stimulate house building and to increase the stock of affordable homes, as set out in the Ministerial Statement issued earlier this year, by the Minister for Housing and Regeneration. The statement makes reference to identifying public land for development as a key intervention that can be made.</p> <p>The allocation of this publicly owned site for residential development, could assist in the bringing forward of much needed housing development in the Neath Port Talbot Borough. It is noted that there are no housing land allocations in Resolven in the LDP and an allocation here would help support and provide local services and community facilities. Consideration will be given to the construction of carbon-negative and carbon neutral homes within this site making use of locally sourced materials.</p> <p>The site is well linked by road to nearby Neath and Glynneath and there are regular half hourly bus services, the X5, which links Resolven to Swansea, Neath and Glynneath. There is access to rail transport at Neath, which is a distance of 9 kilometres away. The site is also well located to connect into the network of footpaths, cycle routes and bridleways which are available locally. There is scope to carry out highway improvements to Tan y Rhiw Road if considered necessary. In addition, if required the existing footpath link to the main built up area of Resolven, could be improved and a possible new path for pedestrians and cyclists could be provided in the north-western part of the site.</p> <p>The development of new housing would support local services and facilities and could also lead to the establishment of new services in this part of the Borough.</p> <p>The development scheme would bring about local benefits in the form of the provision of public open space and contributions to local services and facilities and improved footpath and cycle links to the main part of Resolven.</p>
Dep1327	Mr Wayne Rees	Macob Property Holdings Ltd.	787696	Object	<p>Tyn-y-Caeau Farm, Margam</p> <p>The site being promoted at Tyn -y- Caeau Farm, Margam, is currently excluded from the Settlement Limits (Inset 48 of the Proposals Map) and is also excluded from the wider Employment Land (EC1/2) and Waste (W1/1(b)) allocations. It therefore constitutes unallocated land which is contained by proposed uses on three sides and substantial route corridors to the east.</p> <p>There are existing residential uses in the form of the farm house and a detached 2-storey annex which accommodates 6 bed sitting units. The site is well screened from proposed employment and waste uses by belts of woodland. Proposed adjacent uses will, in any event have to take into consideration the presence of these residential uses by further landscaping and the siting of compatible B1 uses.</p> <p>A residential scheme is therefore proposed which could achieve integration as part of an overall mixed use form of development.</p> <p>We wish to see the site included within the settlement limits (Policy SC1 and proposals map) and subject to a housing land allocation under Policy H1 as part of a wider mixed use development.</p> <p>The site is currently excluded from the wider employment and waste allocations and as a result the Deposit Plan lacks cohesion. There is a need to maximise the use of land as a resource and the omission of the site in question is unsound. If the site were identified for housing as part of a mixed use scheme, the sustainability credentials of the plan would be improved.</p>
Dep1328		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	<p>Land at Coed Hirwaun, Margam Village (Option 1)</p>

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					<p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing developers and the housing market. <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in</p>

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					<p>order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff).</p> <p>In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p> <p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and</p>

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					<p>the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>The proposed Development Framework Plan for Option 1 (see Appendix 5) proposes an indicative development of approximately 490 dwellings, and is the preferred alternative site. The level of development proposed has been defined in consideration of the landscape setting, as well as seeking to ensure that sufficient numbers are present to support a wider variety of community and other facilities.</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans</p>

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					<p>responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have 'no adverse impact on the features and characteristics for which the SLA has been designated' and it would not undermine the purpose and 'integrity of the green wedge'.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p>

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					<p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p>

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					<p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates. <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p>

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					<p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is

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					<p>capable of accommodating the proposed traffic movements.</p> <ul style="list-style-type: none"> Local destinations can be safely accessed from the site via the local highway network. The site has good access to the wider highway network and strategic highway routes. Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> The site is located within close proximity of frequent public transport services and facilities The settlement provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable area as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> The development of the site will not create a potential nuisance in terms of air, light, noise or waste. No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs. <p><i>Flood Risk</i></p> <ul style="list-style-type: none"> The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings. <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep1329	Mr Tony Brinkworth		218483	Object	<p>Land at Cydgoed Quarry, Tonna (Site 2)</p> <p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states: In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate</p>

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					<p>site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well-being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as water, gas and electricity.</p> <p>How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement.</p> <p>I have just seen my site N92 in the LDP Candidate Site Assessment Report (August 2013). The reason for exclusion from the settlement limit is that "The site lies in the open countryside detached from the existing settlement, in an unsustainable location and therefore not in accordance with the settlement strategy. Parts of the site contain areas of significant biodiversity value.</p> <p>I believe they have not been comprehensive in carrying out the Assessment of site N92/218483, due to the wording "immediately adjacent to a settlement limit". Therefore my site has not been fully assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regards to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because "The site lies in the open countryside detached from the existing settlement, in an unsustainable location" The Council are considering 300/400 houses just over 1 field away on a greenfield site - candidate site N35. I see no mention of countryside only greenfield, no mention of unsustainable location and biodiversity value. Surely part brownfield sites should be considered first as opposed to building on higher grade land in the open countryside.</p> <p>This would allow for a full assessment to be made on Candidate site N92, for a few sustainable houses to code 5/6 of the code for sustainable homes with onsite renewable energy savings on a part brownfield site.</p> <p>The Council only seem to be interested in large sites for example, 300/400 houses just only 1-2 fields away to site N92. My proposed site will be more beneficial to sustainability, climate change and biodiversity improvements than any one of these proposed houses.</p> <p>I believe the allocation of sites is not transparent and delivered in accordance of the Delivery Agreement. Site allocations should not incline to be for large housing estates.</p> <p>Having a mixture of housing on a new estate is ok, but there is also a need for individually designed homes such as this site could give to the self builder, they may want to create something tailored to their family's unique requirements; or something architecturally appealing, or because they want to live in a home that they might not be able to afford on the open market. For many, self build is a chance to create the life they have always dreamed of.</p> <p>Why Candidate site N92/218483 (Residential)</p> <p>To build a few sustainable houses which will be built to code 5-6 of the code for sustainable homes. Having architectural merit and being aesthetically sympathetic to the surrounding environment.</p> <p>Brownfield Candidate site N92 is bordering Quarry Road, a site of approximately 4.5 acres (1.8ha) of poor quality land, a brownfield site formerly a Drift Mine with associated waste to the elevated side of the sites, this mine has its entrance near the boundary of the fencing on the east side and tunnels in the direction of Danalan farm. The mound to the east can be seen to be coal waste with some builder's rubble. Some trees as can be seen on the mound have not rooted firmly into the waste. There is a small but constant flow of water at the south side from the drift mine-sealed entrance.</p> <p>Sustainable Sustainable development is the core principle underpinning planning. At the heart of Sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations. It is not my intension and never has been to build a concrete jungle or 150 houses as some Tonna residents have stated and been led to believe. The houses could be built into the side of the mound as not to be on the sky line or even close to the trees on the boarder to help make the house blend in to the environment. Hence the house would be set into the natural folds of the landscape, with the back drop of the mound behind.</p>

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					<p>These houses would have the ground area to incorporate energy and savings in the form of: Solar roof panels, Ground source heat pumps, Onsite spring water, Rain water harvesting, all of which are possible due to the terrain. Sewage treatment plant is also possible but can be connected to the main at Quarry Road/Henfaes Terrace or towards Mount Pleasant. The house nearest the south border could make use of hydro - water generating electricity, whilst the house nearest to the north could take advantage of small wind turbines on the top of the rise.</p> <p>Location of the site allows for good orientation of the dwellings, to make controlled use of solar gain. Large gardens for growing fruit and vegetables, and to accommodate buried rain water tanks, and to make good use of the flowing water at the south side boundary. The site is not liable to flooding.</p> <p>The two established means of access to this site is either from Quarry Road or Mount Pleasant which have been in existence for many years, would be improved and maintained. The hedge over hanging Quarry Road would be trimmed back, and the road surface improved on both accesses.</p> <p>Using these accesses more frequently would provide better security to the surrounding houses and rugby club, also provide for better foot path surveillance on Quarry Road.</p> <p>The site can barely be seen from the local houses or RFC Clubhouse due to the tree's screening these buildings. In fact the site would be difficult to see from most directions other than a few using Quarry Road.</p> <p>The existing community has all the normal facilities including schools, churches, shops, Post Office, pubs and community centre. The bus stops are some 400metres away at Henfaes Road (B4434) and the local schools 325 metres - School Road. There would be no need to provide new facilities.</p> <p>Allocation of this under used lower grade land should be used as opposed to meeting demand by development of higher grade land in the open countryside this would increase the range of sustainable areas in which people would like to live. Houses built in this area would not be on the sky line.</p> <p>A completed development would not impose unreasonable demands on local services. It will help to support local shops, schools, Pubs, churches etc, to develop the site would make a small but significant contribution to climate change, as the location allows for rainwater harvesting, foul sewage treatment plants, ground source heat pumps, solar panels, and photovoltaic cells etc, even small scale wind turbine systems, could be placed upon the mound/mountain, with an input output electrical meter instead of the normal electrical meter, placed in one house. One house could benefit from the flow of water on the north boundary. These houses will be built to code 5-6of the code for Sustainable Homes with onsite energy savings to aid against climate change.</p> <p>If a foul sewage treatment plant in not acceptable to the Council a connection to the main could be made on Quarry Road or the road off Mount Pleasant leading to Quarry Road in my ownership.</p> <p>Occupation of this area would deter people from abusing the surrounding area plus it would help to reduce crime, vandalism, malicious fires, and illegal fly tipping. It would have the effect of policing the maintenance of the surrounding countryside and would provide for footpath surveillance, which would result in a safer environment for the public. It would also deter off road riding/driving of motor cycles and four wheel drive 'jeep type' vehicles, shooting of air rifles and youths damaging trees and undermining the roots making them unsafe.</p> <p>I believe that the 2 Rugby/football fields and surrounding wooded area are not owned by the school but by Council and leased to Tonna Rugby Club, with a blanket tree preservation order in place. Therefore candidate site N92 is defensible in regards to an extended settlement boundary, as it is confined within the site boundary fencing and into the mound. Please see suggested new settlement boundary Plan 1, the registered site plan N92/218483.</p> <p>Finally I respectfully request that the inspector take all the information into account and conclude that there are convincing and compelling arguments for a development to be sited in this candidate site N92/218483.</p> <p>So as not to duplicate paper work, if the building of a few houses is found to be unacceptable on this site N92/218483, would you consider the same site N93/218483 for horse related facilities? Well-kept horses and ponies, in a managed landscape can have a positive effect on the countryside. A little effort made when designing new stabling can lead to a big positive impact on the local landscape, as well as to the health of the horse's or pony's. Suggested-stables to accommodate 3 or 4 horses.</p>

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Dep1332		Persimmon Homes West Wales and New County Leisure Ltd	787762	Object	<p>Land at Coed Hirwaun, Margam (Option 2)</p> <p>Summary of Overall Position</p> <p>An overview / summary of the position taken and evidence put forward by these representations is as follows, with our detailed evidence and supporting case set out in the remainder of this Annex:</p> <ul style="list-style-type: none"> • It is considered that the 2008 Welsh Government housing projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Given the differences between the WG projections and dwelling requirements proposed by the Authority, we consider that this will result in a significant shortfall of housing provision across the County. Accordingly additional housing land is required to be allocated within the LDP. • The Plan's overall supply for housing underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. An additional 'contingency' of housing land supply should, in addition to these contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market and provide greater flexibility over the Plan period. • The currently proposed growth strategy will limit, and undermine, the ability of the County Council to meet the defined aims and objectives of the LDP. • The allocation of further and additional new sites in a range and choice of locations and which, importantly, are deliverable is therefore required. • Support is given to the need to consider the Port Talbot spatial area separately, and also the need to focus development within this area, but it is considered that Port Talbot is underprovided for in terms of the distribution of housing across the County - additional sites are therefore required to be allocated within the Port Talbot spatial area. • The potential and likely contribution of Coed Darcy is questioned given the pace of housing delivery on this site - rates of sales on the development are lower than anticipated due to known constraints, complexities, and timing issues, as opposed to prevailing market conditions per se. Coed Darcy, due to its unique concept, will likely not appeal to a large proportion of the housing market - which is further compounded by its location firmly within the Neath / Swansea 'catchment' area, as opposed to the Port Talbot 'catchment' - Coed Darcy will not therefore provide housing for the needs of whole of the County. The allocation of sites of differing character and location to prevent the Plan's housing land supply being over-reliant on one particular scheme is therefore required. • A number of sites proposed for allocation within the Plan have been assessed as being undeliverable and / or significantly constrained, which further puts into doubt the ability of the Plan to deliver the required number of housing units over the plan period. It is therefore estimated that the Plan has a shortfall of between 754 and 1623 housing units - which further makes the case for the need for additional housing allocations. • A better balance between greenfield and brownfield site allocations are required, particularly in view of the likely deliverability constraints associated with brownfield sites - which has been demonstrated by the associated high abnormal costs associated with developments on brownfield sites. • Furthermore, a number of recently approved LDP's, which have focused development on brownfield sites, have had problems with delivering housing and are failing to provide a five year housing land supply. Accordingly, additional greenfield sites should be allocated in order to ensure the LDP is able to deliver the required housing need. • A wider range and choice of housing sites needs to be provided within the Plan, in order to ensure that a number of clearly deliverable sites are provided for, and which give greater flexibility and certainty as to the development prospects over the Plan period. • The proposed site at Coed Hirwaun is considered to provide an appropriate, suitable and deliverable site which should be allocated within the Plan. • The site at Coed Hirwaun has been assessed as being technically suitable for development in terms of flood risk, transport and ecology, and landscape impact. • Development at this location can be assimilated successfully and sensitively into the landscape, and will not have any adverse impact on the green wedge or SLA. • Furthermore, additional residential development / allocation at Coed Hirwaun would assist create and establish a critical mass of development at this location to sustain further / enhanced community facilities (to the benefit of both existing and proposed residents). This will improve the sustainability credentials of the site. • The site at Coed Hirwaun, being unconstrained and deliverable, will therefore add considerably to the range and choice of sites for housing

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					<p>developers and the housing market.</p> <p>In light of, and as a consequence of these representations, the particular parts / policies of the Deposit Plan which are considered to need amendment, in order to ensure the plan is 'sound', are as follows:</p> <ul style="list-style-type: none"> o Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. o Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. o Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. o Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. o Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>Assessment of the Suitability of Coed Hirwaun / Margam Village for Development</p> <p>Coed Hirwaun represents an existing settlement, which provides a number of facilities and services, and which has become a desirable area to live where there is high demand for additional residential units. In particular, Coed Hirwaun has the following services and facilities:</p> <ul style="list-style-type: none"> • Local Store • Children's Playground • Primary School • Playing Field / Open Space <p>In addition, the community is located circa 300metres from the A48, from which there is good accessibility to the wider area and a number of additional services and facilities. In particular, Pyle is located approximately 2km to the south of Coed Hirwaun, which provides a range of shops and facilities, as well as the Pyle Railway Station (which provides access to both Swansea and Cardiff).</p> <p>In addition, a number of regular bus services run in close proximity to Coed Hirwaun, which includes the following services:</p> <ul style="list-style-type: none"> • 224 Swansea - Porthcawl • X1 Swansea - Bridgend • X4 Neath - Bridgend <p>This is confirmed within the Neath Port Talbot Settlement Topic Paper (August 2013), which defines Coed Hirwaun as a Small Local Centre and provides the following description of the settlement:</p> <p><i>"Coed Hirwaun is a sizable settlement located off the A48 in Margam close to the administrative boundary with Bridgend. The settlement has a Primary School, local shop, playground and sport facilities. There are also good public transport links to and from Port Talbot."</i> (Page 48)</p> <p>Although the community is currently served by a relatively small number of services and facilities, it is considered that additional residential development adjoining the village will provide the combined critical mass required to support a wider range of services and community terms. In sustainability terms, this would serve a need which would reduce a requirement for offsite private transport trips - for both existing and future residents.</p> <p>It is therefore considered that additional residential development would, in principle, be appropriate as an extension to Coed Hirwaun, and that additional housing development would assist in ensuring the continued viability of the existing shops and services, would make additional shops and services more viable, whilst also ensuring that a range of housing is available to provide for the housing needs of the local population.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p>

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					<p>The proposed sites at Coed Hirwaun / Margam Park Village are located principally to the east, west and south of the existing settlement, and are outlined within the enclosed Context Plan and Development Framework Plans (see Appendix 4, 5 and 6), which illustrates how the development of the sites and the Coed Hirwaun settlement could come forward. As outlined above, two alternative site options are provided, which provide for the following:</p> <ul style="list-style-type: none"> • Option 1 - Land to the north-east, south-east and south-west of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40, PT63, PT62, PT52 and PT83) • Option 2 - Land to the north-east of Coed Hirwaun, Margam Village (Candidate Site Reference Numbers: PT40 and PT63) <p>As an alternative, secondary option, the proposed Development Framework Plan for Option 2 (see Appendix 6) proposes an indicative development of approximately 300 dwellings. This site area could also be considered as the first phase of the wider development site (i.e. Option 1).</p> <p>It is noted that the proposed site at Coed Hirwaun, was considered as the Stage 4 - Detailed Assessment of the Council's candidate site assessment process (albeit a wider site was considered than that proposed as part of these representations). This was the final assessment before site allocations were determined, and therefore confirms that the site 'passed' stages 1, 2 and 3. In particular this confirms that the proposed site was confirmed to not be within a European designated site (i.e. Stage 1), was considered to be suitable in planning terms for the proposed use (i.e. Stage 2) and was considered to be compatible with the overall Strategy (i.e. Stage 3).</p> <p>However, it is noted that the site was considered to 'fail' the Stage 4 detailed assessment. As confirmed within the LDP Strategic Housing Site Assessment report (August 2013), the key concerns raised by the Council were considered to be as follows:</p> <ul style="list-style-type: none"> • The site was considered to be in a less sustainable location than others proposed for allocation in Port Talbot; • Loss of open countryside, habitat and species; • Impact on the SLA and Green Wedge; • Impact on Ancient and Semi-Natural Woodland. <p>As outlined above, Coed Hirwaun itself is considered to be located in a relatively sustainable location, and the proposed development will assist in improving the sustainability characteristics of the site. The proposed development is therefore considered to be acceptable in sustainability terms.</p> <p>Our detailed commentary on the other perceived concerns raised is provided below, and confirms that the proposed development is considered to be acceptable in all respects, and accordingly that the proposed allocation of the site is considered to be acceptable.</p> <p>In particular, the development of the proposed parcels of land would seek to integrate into the existing residential development, whilst also ensuring that any potential visual impact on the surrounding landscape is minimised and are both acceptable and appropriate.</p> <p>The development's boundary with the A48 will also be sensitively managed, and an enhanced landscaping buffer provided, in order to minimise views into the site from this road. In addition, the development will be guided by a landscape led masterplan which would allow for usable open space and will have regard to biodiversity and nature conservation, ensuring that any impacts are minimised and are acceptably managed. Accordingly, it is considered that the proposed development would sit well with, and be sensitive to, the existing landscape - as discussed in further detail below.</p> <p>Furthermore, it is considered that an appropriate design of the proposed development scheme as well as sensitive landscaping would seek to minimise any potential negative impact on the surrounding area and landscape setting of the village. In particular, planting will be supplemented / re-designed to ensure a sensitive scheme, which maintains the village's setting within the wider rural landscape. Likewise a sensitive form and design of the scheme, along with appropriate landscaping would seek to ensure that any important views into and out of the village and surrounding areas were protected and / or sensitively managed. Indeed, as the enclosed Development Framework plans show, areas of existing woodland habitat are proposed to be enhanced whilst also creating new public access to these locations - to the benefit of the wider community.</p> <p>There is also the potential to consider an additional / new access into the site from the A48 (as discussed further below), which would alleviate traffic flows by the existing school and at the junction, and which would ensure that a suitable, safe access route is provided into the site.</p> <p>In order to investigate any potential / perceived constraints to the development of the proposed site, a range of survey work has been undertaken which</p>

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					<p>considers a range of issues. This survey work has influenced and shaped the development proposals for the site, with the Development Framework Plans responding to the results of this undertaken work. A summary of the key conclusions of these reports is outlined below, with the complete reports being appended to these representations (Appendix 7 to 12).</p> <p><i>Extended Phase 1 Habitat Survey</i></p> <p>An Extended Phase 1 Habitat Survey has been prepared by Soltys Brewster Ecology (dated April 2012), which gives consideration to the site on Land at Coed Hirwaun, Margam Village. This report is enclosed at Appendix 7.</p> <p>The report confirms that the development framework plan proposed for the site indicates that development could be concentrated in areas of lower ecological value (improved grassland and arable fields), with the trees, woodland and hedgerows (of higher value) largely retained. Subject to the results of additional survey work (as required - dependent on the final form of development), the ecological impact of the development could be minimised through sensitive design and the inclusion of avoidance/mitigation measures as appropriate. In order to inform the design, and to establish the likely presence/ absence of protected or notable species (including Dormice, common reptiles, birds, and bats), further survey at an appropriate time of year would be recommended. In some cases, the requirement for survey could be precluded at the design stage through retention of key ecological features (e.g. woodland blocks), which the development would aim to maintain, thereby minimising any potential ecological impacts. Such ecological matters could therefore be fully considered at the detailed planning stage with any required mitigation forming part of the detailed design process.</p> <p><i>Landscape and Visual Appraisal</i></p> <p>A Landscape and Visual Appraisal (LVA) has been undertaken by Soltys Brewster (dated May 2012), which gives consideration to site on Land at Coed Hirwaun, Margam Village. This appraisal report is enclosed at Appendix 8.</p> <p>The report assessed the appropriateness of development on the site in relation to landscape and visual constraints. The report concludes that, in principle, the site can support the proposed development on the land parcels identified. In particular, the perimeter hedgerow planting and woodland blocks would provide an established framework within which development could be sited and with appropriate landscape mitigation including appropriate landscape led master planning and site layout, architectural design, building layout, material choice and massing, development could be acceptably accommodated on the site and be visually integrated with Coed Hirwaun and within the existing landscape</p> <p>This assessment confirms that the proposed development on site would be appropriate in landscape and visual terms. The visual appraisal carried out confirms that development could be accommodated on the site without appearing to intrude into the wider landscape and that the visual change brought about by development would be minor and not significant in terms of loss of visual amenity. There would therefore be no significant change to the character of the wider landscape brought about by the scheme. Accordingly, the report concludes that the proposed development would be appropriate and could be accommodated without detriment to either landscape character or visual amenity.</p> <p>In addition, Soltys Brewster have prepared a 'Landscape and Visual Rebuttal to LPA Strategic Housing Site Assessment Report (August 2013)'. This report, dated October 2013, is enclosed at Appendix 9, and should be read in conjunction with these representations. The report therefore considers the authority's comments provided with the LDP Strategic Housing Site Assessment Report (August 2013) in regards to the proposed site at Coed Hirwaun which relate specifically to the Special Landscape Area landscape designation, the Green Wedge planning designation, and visual impacts.</p> <p>This assessment confirms that although the site is located within both the LDP proposed Margam SLA (EN2/4) and Margam Green Wedge (EN2/5), that the development would have 'no adverse impact on the features and characteristics for which the SLA has been designated' and it would not undermine the purpose and 'integrity of the green wedge'.</p> <p>Furthermore, the report confirms that the proposed site would not extend unreasonably into the Margam SLA landscape designation, the character of which is in any case already defined by the existing settlement at Coed Hirwaun. The Proposed development at Coed Hirwaun would be located adjacent to the existing settlement of Coed Hirwaun and would reflect local character. Consequently, the SLA designation would not be compromised by the proposed development.</p> <p>The site would also not have an adverse effect on the integrity of the Green Wedge policy. The site is located at considerable distance between Port Talbot to the north-west and Pyle to the south and the site only occupies a small and relatively discrete part of the extensive green wedge designation.</p>

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					<p>The proposed development would not increase the visual prominence of Coed Hirwaun or lead to any adverse cumulative impacts. The site is located within a shallow bowl surrounded by woodland blocks and field boundaries, which would be retained as integral components of site development, reflecting the local character of the area and mitigating visual prominence of the development.</p> <p>Having regard to the conclusions of the report, it is therefore considered that the proposals are acceptable in terms of their landscape and visual impact, and that the development can be sensitively and appropriately accommodated within the landscape.</p> <p><i>Transport and Highways</i></p> <p>Vectos have undertaken a thorough review of the potential of the existing access at Coed Hirwaun in Margam to accommodate additional traffic on land promoted at Coed Hirwaun, Margam. The resulting Technical Note (June 2012) (enclosed at Appendix 10) provides an assessment of the potential highways impacts of a development of up to 490 dwellings, in addition to the existing development at the site.</p> <p>Detailed modelling analysis of the existing junction with the A48, which provides the main access to the site, has demonstrated that there is sufficient capacity to accommodate the increased traffic demands associated with the proposed additional development from the existing point of access. Indeed, the assessment shows that the junction would remain operating well under capacity post the proposed development. Furthermore, the report confirms that, should it be considered necessary, that an emergency access could be provided to the south of the existing junction.</p> <p>In terms of the existing internal site layout and street network, the report confirms that this has been designed in such a manner that the additional development would be accessed via more than one minor road within the existing internal network of streets. As such, it is anticipated that this would not give rise to any internal traffic capacity issues.</p> <p>In addition, in response to dialogue had with Neath Port Talbot County Borough Council, concerns were raised in regards to a single issue - the proposed single point of access to the site. In this regard, and in order to respond to these concerns, a Transport and Highways Addendum (June 2013) has also been prepared by Vectos (see Appendix 11) and is submitted to demonstrate the suitability of the site from this perspective.</p> <p>The report outlines the preliminary proposals for a secondary access point to the site to be provided to the south of the existing access and directly from the A48. This access point would be required in order to provide access to the wider / whole site allocation. The junction has been designed to DMRB standards at 60mph and includes 2.4m*215m visibility splays, a right turn ghost island and pedestrian refuge.</p> <p>The proposed access has been specifically designed to accommodate bus movements in/out of the site to ensure that the proposed additional development on this site is accessible to public transport. This access could also be used for other vehicles to access the additional phases of development proposed on this site.</p> <p>The exact detail of the internal road characteristics would be addressed as part of a future planning application, but as advised by the local highway authority, the indicative proposals for the internal road network provide for a minimum road width of 6.75m which is considered to be acceptable to allow two way bus movements.</p> <p>In terms of bus services, the proposed additional dwellings are considered to provide sufficient critical mass to sustain a more frequent and attractive bus service. Whilst proposed enhancements to bus services have not been agreed at this stage, the proposal may potentially provide subsidy to support more direct and frequent services to Bridgend and Port Talbot. The precise details of this would be addressed within any future planning application on the site.</p> <p>The proposed new access will therefore significantly enhance the accessibility of the existing and proposed residential development, and will afford existing and future residents with more travel choice to destinations such as Bridgend and Port Talbot.</p> <p>It is accordingly considered that this evidence demonstrates that there are no highways constraints to the deliverability of an allocation of the site at Coed Hirwaun.</p> <p><i>Flood Risk / Drainage</i></p>

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					<p>FMW Consultancy Ltd have carried out investigations in relation to flood risk and the foul and surface water drainage capacity of the site, in order to identify any potential issues, constraints and if required, solutions. The resulting Flooding and Drainage Report is enclosed and Appendix 12.</p> <p>The key conclusions of these investigations are as follows:</p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding. Planning policy in Wales encourages residential development in Zone A; • Other parts of the proposed development lie in TAN 15 Zone B. Residential development is normally accepted in these zones, subject to an FCA which complies with the requirements of TAN 15; • There is ample opportunity to ensure that flood risk will not be increased elsewhere as a result of this development; • Ecological enhancements can be built into the storm drainage strategy; • There are opportunities to reduce flood risk to existing dwellings; • There are no other potential sources of flooding constraining development of the site; • The foul sewer infrastructure upgrades needed to support this development are relatively minor compared with those needed to support other sites of a similar 500 unit scale; • There is adequate waste water treatment capacity; and • There is adequate water supply capacity <p>Having regard to the above, it can be confirmed that there are no flood risk constraints or any significant drainage constraints which would restrict the proposed development of the site. Such detailed matters are therefore capable of being addressed as part of any future detailed planning application for residential development at the site and would be subject to further discussions and collaborative working with key stakeholders. Accordingly, the proposed development is considered to be acceptable in this regard.</p> <p><i>Health & Well Being</i></p> <p>A central theme of the overall strategy of the Plan is the need for the Plan (and its associated land allocations) to address the issue of poor health within the County Borough. Strategic Policy SP2 Health therefore identifies a number of measures which will be taken in relation to the high levels of poor long term health and sickness, as follows:</p> <ol style="list-style-type: none"> 1. The development of sustainable, safe and confident communities will be promoted through the co-location of jobs and facilities and the development of community facilities and services in accordance with the settlement framework; 2. People's exposure to the determinants of poor health will be reduced where possible through consideration of the environmental and safety impacts of new developments; 3. Healthier, more active and safer lifestyles will be encouraged through the retention of a range of accessible leisure, recreational, health, social and community facilities throughout the County Borough; 4. Accessibility within and between communities will be improved to encourage active travel; 5. The provision of new employment opportunities will be promoted to reduce unemployment and economic inactivity rates. <p>It is considered that a residential allocation at Coed Hirwaun will assist in all of these respects. The location and setting of the site, away from nearby and surrounding incompatible uses, and within easy access to open space and recreation facilities (including the nearby Margam Park and associated walking and biking facilities etc) will mean that a housing allocation would be ideally located to assist achieve these key objectives of the Plan. This is considered particularly so as development at Coed Hirwaun is particularly appealing to family type housing - ensuring a healthy environment for the considerable number of children who would reside at such a location if a site was allocated for housing development.</p> <p><i>Summary</i></p> <p>As outlined above, the detailed survey work which has been undertaken indicates that there are no significant constraints to development and that therefore, subject to a sensitive design, the proposals are acceptable in principle and the site can therefore be positively allocated in the LDP. Full consideration of these key development influences can be addressed as part of any future planning application for development at the site with, where necessary, suitable mitigation accounted for.</p> <p>This has been confirmed through detailed dialogue with Planning Policy Officers at Neath Port Talbot County Borough Council, who have confirmed (at</p>

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					<p>a meeting on 7th March 2013), that the following were not considered to represent constraints to the development of the site:</p> <ul style="list-style-type: none"> • Flooding; • Drainage; • Trees; • Visual and landscape impact (subject to the detail of any scheme). <p>While concerns were previously raised regarding the single point of access into the site and associated highway capacity/public transport limitations, this has also been appropriately addressed through the Transport and Highways Addendum report (see Appendix 11) which outlines proposals for a secondary access point - as discussed in further detail above.</p> <p>It is noted that the proposed sites at Coed Hirwaun are allocated as being within the Green Wedge within the Deposit Plan Proposal Report. Having regard to the conclusions above, (in particular in relation to the landscape and visual impacts), it is not considered that there is any requirement to define this area as Green Wedge, as the development of this area will not result in the coalescence of any settlements. Accordingly, it is considered that there will be no negative impacts in this regard.</p> <p>As a greenfield site, the proposed site at Coed Hirwaun represents relatively unconstrained development options, which will provide for an established need and provide greater certainty and flexibility over the Plan period. The proposed development, being principally larger, family, housing will also offer a different form of development to that which is likely to be provided on the brownfield sites proposed and will therefore allow for a greater range of choice of development to come forward to provide for a variety of needs across the County.</p> <p>Likewise, due to the greenfield nature of the site, there is likely to be less development costs and less unknown development constraints, such as expensive and lengthy remediation works which are often associated with the development of brownfield land. This will further ensure the deliverability of the sites, but will also provide greater likelihood for developer contributions.</p> <p>Furthermore, it can be confirmed that ownership of the site is in a limited number of parties, meaning that it is clearly deliverable by a national homebuilder and can be brought forward for development early in the Plan period. This will ensure that the aims of the Plan, to provide an adequate supply, mix and type of housing to meet the needs of all residents can be achieved. Furthermore the aim and objective of the Plan to improve and ensure health and well being will be well served by a housing allocation in this location.</p> <p>Accordingly, having regard to the above, it is considered that the proposed site at Coed Hirwaun is considered to provide a suitable, viable and deliverable option for residential development, which will provide additional community facilities for the village, and which will assist in creating a more sustainable community.</p> <p>Summary of the Suitability of Site for Development</p> <p>As outlined above, these representations make comments / objections to the strategy put forward within the Deposit Plan, and also put Coed Hirwaun / Margam Park Village forward as an Alternative Site, in recognition of its suitability to provide for residential development.</p> <p>In summary therefore, the site is considered to be suitable for residential development for the following reasons:</p> <p><i>Economic Viability</i></p> <ul style="list-style-type: none"> • There are no economic constraints which will affect the development of the site within the plan period. • The landowner is in agreement with the proposed land use of the site. • There are no restrictive covenants relating to the use of the land. • The site is able to be served by existing utilities infrastructure. <p><i>Highways</i></p> <ul style="list-style-type: none"> • Satisfactory highway access can be provided to serve the proposed site, including a secondary access from the A48, and the current highway network is capable of accommodating the proposed traffic movements. • Local destinations can be safely accessed from the site via the local highway network.

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					<ul style="list-style-type: none"> • The site has good access to the wider highway network and strategic highway routes. • Additional public transport services could be facilitated through the proposed development. <p><i>Sustainability</i></p> <ul style="list-style-type: none"> • The site is located within close proximity of frequent public transport services and facilities • The settlement of provides a range of services, such as a primary school, children's playground and local store. The community is therefore considered to be suitable for additional residential development. • The development of additional residential units will further sustain the existing services and will ensure additional facilities are provided, to assist in creating a more sustainable community. • Coed Hirwaun is also located in relatively close proximity to a number of larger towns (including Pyle and Port Talbot), and therefore has good accessibility to a range of additional services and employment provision within this area. It is therefore located in a relatively sustainable as compared to other, considerably more rural and remote areas. <p><i>Environmental Health / Amenity</i></p> <ul style="list-style-type: none"> • The development of the site will not create a potential nuisance in terms of air, light, noise or waste. • No adverse impact should arise from the development of the site in terms of contamination. <p><i>Biodiversity / Landscape</i></p> <ul style="list-style-type: none"> • It is considered that any biodiversity impacts can be appropriately managed through the detailed design of any development scheme. • It is considered that any potential landscape impacts can be effectively managed through sensitive design of the proposals and appropriate landscaping. Accordingly, it is not considered that the proposals will cause any significant harm on the surrounding landscape, including the SLA. • The proposal will maintain the majority of trees surrounding the site, and will not have any significant impact on the trees subject to TPOs. <p><i>Flood Risk</i></p> <ul style="list-style-type: none"> • The majority of the development area is located in TAN 15 Zone A - at little or no risk of fluvial or tidal flooding, and flood risk can be appropriately managed within the development. • There is opportunity to ensure that flood risk will not be increased elsewhere as a result of this development and there are opportunities to reduce flood risk to existing dwellings. <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement- increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and a reduction in the provision for windfall sites. • Policy H1 Housing Sites - Allocation of the proposed land at Coed Hirwaun, Margam Village as a residential development site. • Policy SC 1 Settlement Limits - Amendment of the settlement limits around Coed Hirwaun in order to include the proposed alternative site. • Policy EN 3 Green Wedges - Remove the Green Wedge designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. • Policy EN 2 Special Landscape Area - Remove the SLA designation from the proposed site at Coed Hirwaun, in order to allow for the allocation of the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep1335	Mr Tony Brinkworth		218483	Object	<p>Land at Cydgoed Quarry, Tonna (Site 1)</p> <p>Neath Port Talbot County Borough Council, Local Development Plan Call for Candidate sites states: In addition to considering how the sites would meet the area's needs, each site will be assessed in terms of sustainability. You should therefore consider this before submission and ensure that the Candidate site meets overall sustainability principles and objectives for example; reducing the demand for car use, encouraging walking and cycling, improving health and well- being and protecting and enhancing the environment. The site will also need suitable access to the highway and public utilities, such as</p>

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					<p>water, gas and electricity. How can the plan be sound when the Council have not delivered the Plan in accordance with the Delivery Agreement.</p> <p>I have just seen my site N90 in the LDP Candidate Site Assessment Report (August 2013). The reason for exclusion from the settlement limit is that "The site lies in open countryside detached from the existing settlement, in an unsustainable location and therefore not in accordance with the settlement strategy. Parts of the site contain areas of significant biodiversity value.</p> <p>I believe they have not been comprehensive in carrying out the Assessment of site N90/218483, due to the wording "immediately adjacent to a settlement limit". Therefore my site has not been fully assessed in terms of sustainability.</p> <p>I am of the opinion that the LDP Plan is sound in regards to Welsh and National Policies, but falls down by how quickly my site was thrown out at an early stage of the process because "The site lies in the open countryside detached from the existing settlement, in an unsustainable location The Council are considering 300 houses just over 1 field away on a greenfield site - candidate site N35. I see no mention of countryside only greenfield, and no mention of unsustainable location and biodiversity value. Surely part brownfield sites should be considered first as opposed to building on higher grade land in the open countryside.</p> <p>This would allow for a full assessment to be made on Candidate site N90, for one of the first Code 6 of the code for sustainable homes to be built in Wales if not the UK with onsite renewable energy and giving a 10 acre improvement in biodiversity, on a part brownfield site.</p> <p>The Council only seem to be interested in large sites for example, 300/400 houses just only 1-2 fields away to site N90. My proposed site will be more beneficial to sustainability, climate change and biodiversity improvements than any one of these proposed houses.</p> <p>I also believe the allocation of sites are not transparent and delivered in accordance of the Delivery Agreement. Site allocations should not incline to be for large housing estates.</p> <p>Why Candidate site N90/218483 (Residential)</p> <p>To build one renewable energy generating house which will be built to code 6 of the sustainable homes. Having architectural merit and being aesthetically sympathetic to the surrounding environment.</p> <p>Brownfield Candidate site N90 is bordering Quarry Road and Cydgoed Quarry, a site of approximately 6 acres (2.4ha) of poor quality land, a brownfield site formerly a Drift Mine with associated waste to the elevated side of the site, this mine has its entrance near the boundary of the fencing on the east side and tunnels in the direction of Danalan farm. The mound to the east can be seen to be coal waste with some builder's rubble. Some trees as can be seen on the mound have not rooted firmly into the waste. There is a small but constant flow of water at the south side from the drift mine-sealed entrance.</p> <p>Sustainable Sustainable development is the core principle underpinning planning. At the heart of Sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations.</p> <p>It is not my intension and never has been to build a concrete jungle or 150 houses as some Tonna residents have stated and been led to believe. The house could be built into the side of the mound as not to be on the sky line or even close to the trees on the boarder to help make the house blend in to the environment. Hence the house would be set into the natural folds of the landscape, with the back drop of the mound behind.</p> <p>This house would have on site renewable energy and savings in the form of: Solar roof panels, Small wind turbines, Hydro- water generating electricity, Ground source heat pump, On-site spring water, Rain water harvesting, all of which are possible due to the terrain. Sewage treatment plant is also possible but can be connected to the main at Quarry Road/Henfaes Terrace or towards Mount Pleasant.</p> <p>Implementation of Better Woodlands for Wales Management Plan, case Ref:14717 would improve the biodiversity of the bordering woodland in my</p>

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					<p>ownership, and generate some 20 tonnes of waste wood every year of which some 8 tonnes would be used to create energy for the house. Wood used to partly heat the house would create zero carbon emissions. (Annex A)</p> <p>The location of the site allows for good orientation of the dwellings, to make controlled use of solar gain. Large gardens for growing fruit and vegetables, and to accommodate buried rain water tanks, and to make good use of the flowing water at the south side boundary. The site is not liable to flooding.</p> <p>The two established means of access to this site is either from Quarry Road or Mount Pleasant which have been in existence for many years, would be improved and maintained. The hedge over hanging Quarry Road would be trimmed back, and the road surface improved on both accesses.</p> <p>Using these accesses more frequently would provide better security to the surrounding houses and rugby club, also provide for better foot path surveillance on Quarry Road. The site can barely be seen from the local houses or RFC Clubhouse due to the tree's screening these buildings. In fact the site would be difficult to see from most directions other than a few using Quarry Road.</p> <p>The existing community has all the normal facilities including schools, churches, shops, Post Office, pubs and community centres. The bus stop is some 400 metres away at Henfaes Road (B4434) and the local schools 325 metres - School Road. There would be no need to provide new facilities.</p> <p>Allocation of this under used lower grade land should be used as opposed to meeting demand by development of higher grade land in the open countryside this would increase the range of sustainable areas in which people would like to live. A horse stable could also be built.</p> <p>A completed development would not impose unreasonable demands on local services. It will help to support local shops, schools, Pubs, churches etc, to develop the site would make a small but significant contribution to climate change, as the location allows for rainwater harvesting, a foul sewage treatment plant, ground source heat pump, solar panels, and photovoltaic cells etc, even small scale wind turbine systems, could be placed upon the mound/mountain, with an input output electrical meter instead of the normal electrical meter, placed in one house. Waste wood from the surrounding area, under a Better Woodlands for Wales Management Plan, could provide renewable energy resource giving zero carbon emissions. This house will be built to code 6 for sustainable homes.</p> <p>If a foul sewage treatment plant in not acceptable to the Council a connection to the main could be made on Quarry Road or the road off Mount Pleasant leading to Quarry Road in my ownership.</p> <p>Occupation of this area would deter people from abusing the surrounding area plus it would help to reduce crime, vandalism, malicious fires, and illegal fly tipping. It would have the effect of policing the maintenance of the surrounding countryside and would provide for footpath surveillance, which would result in a safer environment for the public. It would also deter off road riding/driving of motor cycles and four wheel drive 'jeep type' vehicles, shooting of air rifles and youths damaging trees and undermining the roots making them unsafe.</p> <p>I believe that the 2 Rugby/football fields and surrounding wooded area are not owned by the school but by Council and leased to Tonna Rugby Club, with a blanket tree preservation order in place. Therefore candidate site N90 is defensible in regards to an extended settlement boundary, as it is confined within the site boundary fencing. Please see suggested new settlement boundary Plan 1, the registered site plan N90/218483 also the UDP map and the old Borough of Neath Local Plan (Inset map 3, map reference E61C).</p> <p>Finally I respectfully request that the inspector take all the information into account and conclude that there are convincing and compelling arguments for a development to be sited in this candidate site N90/218483.</p>
Dep1336	Lucy and Patrick Murray		787464	Object	<p>Land at Rutherglen Yard, Felindre (Site A)</p> <p>Site History</p> <p>The site was assessed as a candidate site in the LDP Candidate Site Assessment Report ('the Report'). It comprises of .21hectares of land and reference to it is to be found at page 42 of the Report. The reasons for not including the site within settlement limits are that 'The site does not provide a natural and logical extension to the settlement (i.e. it is not physically, functionally and visually related to the existing settlement pattern). It is therefore</p>

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					<p>considered an unacceptable intrusion into the countryside.</p> <p>The site is currently outside settlement limits in the UDP. It is submitted that, contrary to the NPTCBC's assertion, the site is physically, functionally and visually related to the existing settlement pattern. It is abutted by housing to the north (Bay View), to the south (Rutherglen) and to the east. It is enclosed by development save for on the west where physically, functionally and visually open countryside begins. Any development would be small scale due to the steeply sloping nature of the site and the existence of Tree Preservation orders.</p> <p>LDP - policies - reasons why the site should be included within settlement limits</p> <p>The Development Strategy and Spatial Strategy (paragraphs 2.3.11 and 2.5 LDP). The area along the coastal corridor and the urban areas of Neath and Port Talbot are the focus of development. The site falls within this area. The site is within the top tier of the Settlement Hierarchy set out at Table 8.1 of the Settlement Limit Topic Paper and has been therefore identified by NPTCBC as within an area which is the most sustainable location.</p> <p>Social and Environmental Consideration There is no flood risk.</p> <p>Economy and Employment The site has excellent connections to M4 and Junction 40 is minutes away by car. It is within walking and cycling distance of the town centre. There are also excellent transport connections.</p> <p>Sustainable transport The Core network includes the A4107 which abuts the site (5.4.8). This route has been identified in the Regional Transport Plan as part of the Regional Strategic Highway Network consisting of major roads providing key routes through the County Borough. The proposed development of the site will not have an adverse effect on the existing highway network as the Highway Authority have accepted that the new proposed access is technically possible and is an improvement on the existing junction from Bay View. The site is within a walking and cycling distance of the city centre and in existing bus routes.</p> <p>Overarching policies The site comes within the top tier of the Settlement Hierarchy for Neath Port Talbot (Sustainable Communities Table 3.1). It is therefore in the most sustainable location. Any development would not result in the loss of existing community facilities.</p> <p>Area based policies The Coastal Corridor Strategy Area The majority of new residential is to be along the Coastal Corridor and the site lies within this area (4.0.2).</p> <p>Topic Based Policies (in so far as they are relevant) Open Space The proposed development would not lead to a loss of open space. It is envisaged that as only a small number of houses could be built on the site much of the land would be opened up to the public for use as a green space. The public currently do not have access and the site is disused. A playground could be built as part of the development.</p> <p>Environment and Resources No investigation of soils has been conducted but it seems unlikely that the land is of agricultural value. According to the LDP Deposit Plan Map the site comes within a Safeguarded Mineral Resource are Category 1 Sand and Gravel Resource but the objectors have seen no evidence for this nor any reasoning in any document produced by NPT for this categorisation.</p> <p>Housing allocation It is submitted that due to the sustainability of the site it should be included within housing allocation and within the housing site sin Policy H1 (5.5.1).</p>

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					<p>Summary</p> <p>In summary therefore the site is 'sustainable' in terms of development. It is in the most sustainable location within the Deposit Plan. It abuts the A4107 which affords excellent transport infrastructure. The area should not be described as countryside. It is almost enclosed by development to all sides except the west. There is no amenity value to the land. By reference to the policies set out in the Deposit LDP it should be included within settlement limits and housing allocation. The exclusion of the site from settlement limits and housing allocation fails the tests of coherence and effectiveness as the site should be allocated by reference to relevant policies. Further, the failure to allocate the site within settlement limits is not consistent with abutting local residential land use and relevant policies, in particular sustainability.</p>
Dep1337	Ms A Howells		785143	Object	<p>Former Barracks Site, Pontrhydyfen</p> <p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the site shown edged red on the attached plan (Appendix 1) as being within the settlement limits of Pontrhydyfen within the Local Development Plan.</p> <p>The site is located at the south eastern end of Pontrhydyfen with links to all the facilities this area has to offer.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped.</p> <p>Planning History</p> <p>P2002/0967 - Outline - Approved 11/11/03 - (Appendix 2) P2006/1635 - Reserved Matters for 02/0967 - Approved 08/08/08 (Expired 08/08/10) - (Appendix 3) P2006/1637 - Road - Approved 11/03/08 (Expired 11/03/13) - (Appendix 4) P10/0810 - Variation of condition 4 of application P2002/0967 approved 11/11/03 regarding the period of time by which the developer must start development (Reserved Matters application P2006/1635 approved on 08/08/08) - Disposed 13/11/12. This was disposed of under Article 29 Paragraph 15 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012.</p> <p>The Neath Port Talbot Unitary Development Plan included the site within the Settlement Limits for Pontrhydyfen and subsequently outline planning permission was approved for the development of the site on (App. No.P2002/0967 refers - Copy attached - Appendix 5).</p> <p>Subsequently a full application relating to the access into the site was submitted and approved by the Local Planning Authority (App. No. P2006/1637 refers) A reserved matter application was submitted for the provision of 45 houses with ancillary roadways. Was approved (App. No. P2006/1635 refers) - (Appendix 5) An application for a variation of a condition relating to the date of commencement for the proposed development was Finally Disposed on 13th. November 2012 (App. No P10/0810 refers (see above)</p> <p>The reason the Application P10/0810 was Finally Disposed related to the non completion of an Unilateral Undertaking for a contribution towards open space facilities in the area. The developers had been declared bankrupt and the land was repossessed by Barclays Bank and as the original applicants no longer had an interest in the land they could not sign the UU and for some reason the Bank declined to sing the UU as well. The land was subsequently sold at auction in early 2013.</p> <p>Justification for Inclusion as an Alternative Site</p>

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					<p>The Local Planning Authority has set out criteria whereby sites capable of development for residential purposes may be considered and have indicated that preference to such allocations will require the site to be contained within Settlement Limits and also should be on previously used land.</p> <p>It is clear from the planning history and that the Local Planning authority had granted planning permission from the site but the permission lapsed due to the non signing of the Unilateral Undertaking. The site was therefore one with planning permission when the LDP process commenced.</p> <p>In the Population and Housing Topic Paper produced by Neath Port Talbot County Borough Council there are a number of statements that support the inclusion of this site as being within the Settlement Limits. The site must be considered as a possible windfall site and Table 9.7 on page 86 of the report indicates that such windfall sites are expected to either have an extant planning permission or that planning permission has lapsed.</p> <p>Furthermore, Table 9.9 on pages 88/89 of the report identifies 'The Barracks Site' as a site with an unimplemented planning permission with a capacity for 44 units. Paragraph 9.3.14 states that there is not the expectation that all sites identified in the plan will deliver new housing in the future. There remains the possibility, however, that a number of the sites will be implemented and this category of development site therefore represents a significant potential source for new housing. It is considered that this is one such site.</p> <p>Paragraph 9.5.2 (page 102) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Whilst the site subject of this application was not submitted as a candidate site at the commencement of the LDP process, it nevertheless had an extant consent at that time and there was an expectation that the site would be developed and it was only due to the non completion of the Unilateral Undertaking that the planning permission was not implemented.</p> <p>Consequently no application to have the site included as a Candidate Site was made at the initial commencement of the LDP. Currently the site remains within the Settlement Limits of Pontrhydyfen under the provision of the extant development plan - the Neath Unitary Development Plan.</p> <p>Within their own report (Population and Housing Topic Paper - August 2013), the Council having identified The Barracks Site as potentially providing 44 residential units in Table 9.9 (see above) but has then excluded the site from being within the Settlement Limits of Pontrhydyfen.</p> <p>Turning now to the provision of Affordable Housing within the Draft LDP, the Council has considered the contents of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 7.47 on page 89 at Fig. 80 shows the number of houses required in the period 2011 - 2026, namely Market Housing - 4900 and Affordable Housing - 3100.</p> <p>Paragraph 7.54 indicates there is a requirement for Affordable housing across all areas of Neath Port Talbot, and given the strategic requirement identified it will be important to maximise Affordable Housing delivery wherever possible. Nevertheless. the Council will need to consider the appropriate strategy for the future housing mix in each area based on individual area profiles provided.</p> <p>The Draft LDP lists targets for the provision of Affordable Housing and it is the Authority's aim to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas.</p> <p>The LPA has reduced the Settlement Limits of Pontrhydyfen in the LDP, thereby excluding this site and as a consequence restricting the number of</p>

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					<p>opportunities to:</p> <p>a. Allow for controlled expansion of the village and b. Allow for a percentage of Affordable Homes to be constructed to meet local demand.</p> <p>On this last point it should be noted that whereas the previous planning permission would not have provided any Affordable Housing, The consequence of including this site within the settlement means that it would provide a percentage of Affordable Housing that would go some way to reducing the acknowledged shortfall of approximately 600 Affordable Home units identified by the Authority in Paragraphs 4.0.41 and 6.0.4 of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 6.0.5 of the same document states that the need for affordable housing remains a key issue for the Deposit Plan. This strategy is reinforced by paragraph 7.0.5 which seeks to provide additional affordable housing units throughout the County Borough and ensure new housing development makes a fair and justified contribution towards the provision of affordable housing.</p> <p>Although the Council has reduced the number of Affordable Homes required over the plan period from 3100 to 2500 (i.e. the 600 shortfall) it acknowledges that the Local Housing Market Assessment 2012 (see above) has identified the need for 3100 affordable units over the LDP period. Paragraph 9.0.6 states that the planning system will not be able to meet the entire need (of affordable housing) over the plan period.</p> <p>The site subject of this application has undergone scrutiny through the planning application process in 2008 when the LPA was satisfied that the relevant constraints relating to the site could be overcome and as such recommended approval of the access and layout for 44 dwelling units. Extensive consultation took place prior to any recommendation being made and no objections were received from the statutory consultees during the determination process (see copy of Officers report attached).</p> <p>Conclusion</p> <p>The proposed development if included within the Settlement Limits allows for the managed expansion of the settlement of Pontrhydyfen in a sustainable location with good access to both the areas of Neath and Port Talbot Town Centres and the more local facilities and services on offer in Pontrhydyfen. The Local Planning Authority has as recently as 2008 considered the site to be within the Settlement Limits of Pontrhydyfen and has previously granted planning permission for its development.</p> <p>Development of the site would help support the facilities and services in Pontrhydyfen and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth Area' of Pontrhydyfen.</p> <p>The Local Planning Authority's considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims and would also provide for Affordable Housing that would go some way to reduce the identified shortfall of such units within the County Borough area over the plan period.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Pontrhydyfen as defined by the Local Planning Authority and it should not have been removed from the Settlement Limit as defined in the extant Unitary Development Plan.</p> <p>ADDENDUM BY APPLICANT</p> <p>The LDP vision is to reinvigorate the valley communities. New housing is needed to support facilities and services in the communities.</p> <p>The Topic Papers state that Pontrhydyfen lies within a narrow valley which is constrained by topography. Nevertheless it is a village crying out for regeneration. Building land in the village is limited except for a 5.5 acre site previously granted planning permission for 45 dwellings that the local community supports. However due to certain circumstances the developer failed to complete an Unilateral Undertaking and the consent was not</p>

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					<p>implemented.</p> <p>The land has now been purchased at auction and its inclusion within the Settlement Limits for Pontrhydyfen will bring much needed housing, including Affordable housing to the village.</p> <p>It will also bring employment and will help sustain local businesses. The site's inclusion within the Settlement Limits will strengthen the community making Pontrhydyfen a more sustainable place for future generations and bringing positive benefits to the community.</p> <p>The site was previously occupied by approximately a dozen cottages. The usual services such as sewerage, water and electricity are available on site and the site is outside the flood zone (see attached plan - Appendix 6). It has not been identified as a site of Special Interest, it is not a conservation area and neither is it a site of special scientific interest.</p> <p>The area benefits from a deed of covenant from the Welsh Assembly Government allowing for a easement for access and a widening of the existing road for the benefit of future development (This access has the benefit of a full planning permission issued by the Local planning Authority - see above).</p>
Dep1338		Natural Resources Wales	748015	Object	<p>Land to the South of Tonmawr Road, Tonmawr</p> <p>It is submitted that the site shown on the attached plan, which comprises 2.19 hectares, should be allocated for housing in the LDP.</p> <p>The site falls within the Valleys Strategy Area, where the Council plan to re-invigorate the Valleys. The allocation of this site for housing would be compatible within this strategic aim.</p> <p>SP7 identifies a dwelling requirement of 9,150 units, based on an estimated increase in households of 8027 over the plan period, which is significantly lower than the latest Welsh Government (2008) Household Projections of 10,000 households. This is a significant departure which is not justified by the supporting evidence base.</p> <p>Although the site was included within the settlement boundary in the adopted UDP, it now falls outside of the LDP settlement limits for Tonmawr. However, the site relates well to the built form of Tonmawr, is suitable for development and it is submitted that the settlement limit be re-defined to include this site. There is existing housing to the west and north and forestry land to the south, west and east, the proposal is compatible with surrounding land-uses.</p> <p>The site is not protected by any special protective countryside designation.</p> <p>The allocation of this site would support the Welsh Government's commitment to stimulate house building and to increase the stock of affordable homes, as set out in the Ministerial Statement issued earlier this year, by the Minister for Housing and Regeneration. The statement makes reference to identifying public land for development as a key intervention that can be made.</p> <p>The site is well linked by road to nearby Neath and there are regular hourly bus services, service number 159, which links Tonmawr to Neath, Cimla and Pontrhydyfen. There is access to rail transport at Neath, which is a distance of approximately 5.5 kilometres away. The site is also well located to connect into the network of footpaths, cycle routes and bridleways which are available locally.</p> <p>The site is partly in public ownership and its allocation for residential development, could assist in the bringing forward much needed housing development the Valleys Area of Neath Port Talbot Borough. Consideration will be given to the construction of carbon-negative and carbon neutral homes, within this site, making use of locally sourced carbon sequestering materials.</p> <p>The proposed new housing would also support local services and facilities and could also lead to the establishment of new services in this part of the Borough.</p> <p>The development scheme would bring about local benefits in the form of the provision of public open space and contributions to community services and facilities. Part of the site is owned by Tonmawr Rugby Club and the development of this site for housing would facilitate the provision of a new club</p>

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					house adjacent to the rugby pitches. In addition, The proposal would help the Council with their objective to re-generate valleys communities.
Dep1339	Mr. Sam Hawking and Mr. Dan Madge		787198	Object	<p>Land to the South of 262 Graig Road, Godre'r Graig</p> <p>Objection seeking realignment of settlement boundary south of 262 Graig Road, Godre'r Graig, SA7 2NZ and revisions to para 5.1.6</p> <p>1. Introduction</p> <p>1.01 This submission objects to the removal from the current UDP settlement boundary of the parcel of land described within. It also sets out an objection to the detailed process lying behind that described in para 5.1.6 for identifying small sites within the LDP settlement boundary which has led to the proposed removal of this site.</p> <p>2. Analysis of this piece of land and its context</p> <p>2.01 The objectors, private property developers, are currently involved in negotiations to purchase the sites set out within for residential development, and specifically are within days of land-transfer on the most southerly plot A, which is in the hands of solicitors. Due to the timing of the LDP deadlines the purchases have not yet gone through.</p> <p>2.02 The most south-west plot (A on the attached plan, appendix 1) did contain a row of garages, and one still remains, with the hard standings of the others remaining albeit some are under vegetation including Japanese Knotweed. It had outline planning consent P2008/0544 dated 13th January 2009 for 2no. semi-detached houses and 1 detached house. The details pursuant application had to be lodged by the owner/applicant by 13th January 2012. This did not occur. The whole development then would have had to start construction by 13th January 2014 but because the first deadline was missed the application is now deemed lapsed or 'lost'. The objectors were not informed of the lapse, and discovered it only recently. The current owners believed that they had 5 years to start on site and did not understand the 3-year section and its implications.</p> <p>2.03 Plot B (appendix 1) to the immediate north has planning consent P2004/0875 followed up by P2007/342 for 2 semi-detached dwellings. Construction of the foundations and upper-level deck started and therefore planning is extant or 'at large'.</p> <p>2.04 Plot C (appendix 1) is no. 262 Graig Road. This is an existing house with significant land to the rear and NE, which makes up the remainder of the land subject to this objection. It is currently empty and in a bad state of repair due to its owner being in a nursing home with no delegated power of attorney. Only the SW part of this site, that specifically around the house, is included in the current UDP plan despite the fact that the land ownership of 262 includes the land to the NE within plot C.</p> <p>2.05 The sites are level with the back edge of pavement and thereafter the land falls steeply to the south-east, albeit at varying depths and angles of gradient. There are other outlying sheds on the down-slopes and the site may be described as 'brownfield'. See photos.</p> <p>2.06 Although there is in places dense shrub cover this is as a result of general cover since the plots have received planning consent. There are no mature trees on the site but some smaller, poor quality species, as with many other gap-plots along this lengthy road.</p> <p>2.07 Graig Road lies within a long settlement boundary that stretches along the A4067 Brecon Road valley towards Ystalyfera as shown on the current UDP plan (reproduced in appendix 2) but focussed on the upper road that runs parallel for most of the distance. The parcel of land that we refer to is circled, albeit the garden or 'curtilage' to 262 Graig Road is not fully included. Appendix 3 shows an enlarged view of the area again circled.</p> <p>2.08 Although in this section of Graig Road there is little land included south of Graig Road, it will be seen that to the south west and north east this is not the case and both sides of the road are included. The LDP proposed the removal of this section and shows only the northwest side of this section of</p>

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					<p>road as deemed acceptable within the settlement limit.</p> <p>3. Policy framework</p> <p>3.01 The current UDP settlement boundary includes much of the subject land in the settlement boundary. To achieve this the planning consented sites and actual building plot in this particular location were included.</p> <p>3.02 Paragraph 5.1.6 of the LDP states the following "Allowances - these sites will not be specifically identified within the Plan, but the contribution they will be expected to make will be accounted for by incorporating an allowance into the overall housing provision. These sites have been calculated based on past trends, the settlement hierarchy and the results of the urban capacity study. They comprise:</p> <ul style="list-style-type: none"> • Windfalls - sites of 10 residential units or more which may comprise previously developed sites which may unexpectedly become available over the Plan period. • Small Sites - sites with a capacity of less than 10 residential units which comprise of previously undeveloped land and small windfall sites (that are unforeseen). " <p>3.03 Lying behind the main LDP is a background paper entitled " LDP Strategic Housing Site Assessment Report August 2013". As the name suggests it sets out the systems and procedures used to identify and assess sites for, among other things, the new LDP settlement limits.</p> <p>3.04 Within this clauses 3.1.1 & 3.1.2 state: "In order to ensure that the land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP the Council has taken a significant number of sites into consideration, including those UDP allocations that currently remain undeveloped which do not have a 'live' planning permission.</p> <p>It should be emphasized however that the assessment itself was not designed to provide detailed technical assessment on a site-by-site basis; the process simply provided a comprehensive overview of the development potential of sites and critically is based on the best information available at the time of the Plan preparation." (their emphasis)</p> <p>Following these statements there is table 3.1 "Detailed site analysis" which shows how sites were assessed.</p> <p>3.05 Clause 3.2.1 states that: "the report concentrates on "the stage 4: detailed assessment, and considers the following:</p> <ul style="list-style-type: none"> • Those Candidate Sites that reached Level 4 of the Methodology • Those UDP allocations that currently remain undeveloped which do not have 'live' planning permission, and • Additional sites that were considered worthy of assessment <p>3.06 Nowhere that we could find is there a statement about the necessity of a current planning consent being in place for a site to survive. However, the following clause3.2.2. states: "Given that such (landbank) sites have a 'live' planning consent the sites were not scrutinised and subjected to the same level of assessment".</p> <p>3.07 Close discussion and analysis with the NPT staff however has identified that where small sites on the edge of settlement limits have a lapsed planning consent they are automatically removed from the LDP settlement limit. The view of the LPA officers is that the owners have shown no evidence of wishing to pursue the sites and thus other sites should take their place. It appears that in fact no "stringent assessment" takes place.</p> <p>3.08 We have argued in another very similar objection (62 Afon Road, Duffryn) that a wide range of housing sites is required to maintain inward investment and community growth around existing settlements without placing further pressure on green belt and open countryside. Thus, in our view, LPAs should actively include small sites that are 'gaps' within existing well-established settlements and not be fighting any increases beyond allocations that can be made from 'theoretical' sites that actually remain undeveloped for countless years. And as they state, such sites, without any planning consents, are retained despite total inactivity. The LPA being ahead of developers is a positive benefit in this case.</p>

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					<p>3.09 We therefore suggest that a paragraph is inserted of this nature: "Unless there is some significant change of circumstance that would render a small site no longer 'sustainable' or would fail another criterion of the site selection process, such small sites where planning consent has lapsed but are within the previous settlement boundary shall remain within the settlement boundary and shall not be automatically removed."</p> <p>4. The arguments for retaining (and extending) this specific site</p> <p>Plot A</p> <p>4.01 Removal of sites that have been through the planning process for the simple reason that nothing appears to be happening, upon which planning consent has been granted, and where the UDP boundary has been extended to enclose them, is, we suggest, inconsistent. Much time and effort (and income) was spent assessing their suitability and it is now arbitrarily thrown away. As quoted above, the council does not take this attitude with the larger, strategic sites. Further, nowhere could we find any written indication that these small sites (where the planning has lapsed) are to be automatically removed. Whether stated or not we object to this arbitrary removal.</p> <p>4.02 There are many reasons why a site may not have progressed. The extraordinary effort of the parties to obtain consent should not be so lightly wasted. This is especially true where the site is in the centre of a settlement boundary such as plot A, almost the epicentre of the long drawn out boundary for this ribbon settlement.</p> <p>4.03 In addition the site adjacent has received planning consent and work has started, and beyond that is an existing house and without a single gap the other side of the road is developed for residential use. An overwhelmingly strong case exists for retention.</p> <p>4.04 The site would still meet all the criteria set out in the "LDP Strategic Housing Site Assessment Report August 2013". It is brownfield and as sustainable as any others in the whole street. Nothing has occurred in the intervening year (2013) that would mean that it now fails the criteria.</p> <p>4.05 In this case the owners claim that they thought the planning consent had until January 2014 to run and that is why the site was up for sale to the objectors. The site is thus in fact active whether or not planning has lapsed. No rigorous examination has occurred here. But without pointing blame we have an opportunity here to retain the site, and surely others, in the LDP.</p> <p>Plot B</p> <p>4.06 It is hard to understand why a site with an extant planning permission has been removed. We feel there is little more to add to what has already been stated for this and other parts of the site. Although planners may be irritated that the building has not been completed there may again be many reasons why this is so, worthy of investigation. Perhaps a system should exist to force or encourage sites to be developed but treating the Plan as if there is nothing there (effectively) is not the answer, and the answer to such 'stuck' development sites surely lies outside the LDP planning review process and better set in a legal process. In fact, as we can now show, a developer (the objector) is seeking to unlock the site and is finding that the site is being undermined by apparent unaccountability within the LDP process.</p> <p>Plot C</p> <p>4.07 If plot B is hard to understand then taking an existing house out of the centre of the UDP settlement boundary is impossible to fathom for the general public, especially when all the other factors enumerated above are taken into account.</p> <p>4.08 In fact as simple research has shown the owner is elderly and confused, in a care institution, and possibly unable to make decisions. The house is likely to remain undeveloped until his death and then the trustees/administrators may act. In this case there is thus the opportunity to retain a site that will</p>

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					<p>contribute within the existing well-established settlement where people are used to seeing a large, rambling house, and where, if the full land holding is included a few more houses could be accommodated without any real objection.</p> <p>4.09 But when the three plots are taken together the contribution, which may be perhaps 8 - 10 houses becomes significant. If the site were already a strategic site it wouldn't even need planning consent to be retained for 30 years or so as designated land supply for housing.</p> <p>5. Conclusion</p> <p>5.01 For the reasons set out above we object to the procedural test P2 ("The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment") being adequate, since no real test has in fact been applied, or if it has there is no transparency.</p> <p>5.02 We also object to Consistency tests C1 ("It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas") because it appears to have no regard to anything in the area and vicinity.</p> <p>5.03 C4 states that "It has regard to the relevant community strategy/ies". However it fails in this site's case to take into account the community housing needs which are to ensure that this particular area is provided with a good range of housing without further expanding the linear development into open landscape and countryside. We thus believe that it fails this test as well.</p> <p>5.04 We wish to object to Coherence and Effectiveness tests CE1 and CE4 with regard to our site and specifically to encourage the inclusion of our site and indeed others on the down-side of the road. We see a lack of coherent strategy or flexibility in this case.</p>
Dep1340	Mr M Gwynne		787697	Object	<p>Land at Moorlands, Dyffryn Cellwen</p> <p>Seeking allocation of new residential development site. Additional land is required within the settlement limit of Dyffryn Cellwen. Part of the site is already the subject of a detailed planning permission for 5no. dwellings (Application no. P2004/1547 refers) which has commenced and is to be served by a standard estate road access.</p>
Dep1341	Mrs E H Tipuric		785141	Object	<p>Land off Glynmeirch Road, Trebanos</p> <p>This application is made in order that consideration be given for the inclusion of the site shown edged red on the attached plan (Appendix 1) as being within the settlement limits of Pontardawe/Trebanos within the Local Development Plan.</p> <p>The site is located at the east of Glynmeirch Road, Trebanos with links to all the facilities this area has to offer.</p> <p>No application was made for the inclusion of the land subject of this application as a Candidate Site at the initial stage of the LDP process or as a site that should be contained within the Settlement Limits of Pontardawe/Trebanos.</p> <p>Planning History - (See Appendix 2 - Plan of Planning Approvals within the site)</p> <p>The area coloured green on the attached plan has a 'Live' planning permission under planning number 2/2/91/0263/03, (see letter dated 17th March 2006 from Neath Port Talbot Council Planning Department).</p> <p>The site coloured orange on the attached plan was granted planning permission under planning number 2/2/90/0257/03 and work had commenced to keep the planning permission 'Live'. This was confirmed in a letter dated 17th March 2006 by the Neath Port Talbot Planning Department. The route of the Gas Pipeline went through the application site and as a result sterilised the site from any future development.</p> <p>An application for planning permission was therefore submitted under application number P2006/1803 (coloured red on the attached plan) for a new dwelling to replace the live consent granted under application 2/2/90/0257/03. This application was refused by the Local Planning Authority but was subsequently allowed at Appeal in a decision dated 29th October 2007 (See Appendix 3).</p>

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					<p>An application for planning permission for residential development on the land shown coloured blue on the attached plan was submitted under application P2006/1804 . This was again initially refused by the Local Planning Authority but subsequently allowed at Appeal in a decision letter dated 29th October 2007 - (See Appendix 3)..</p> <p>The land coloured brown is the access road into the site that has also been approved and work on its construction has commenced (see letter dated 17th March 2006 from Neath Port Talbot Council Planning Department).</p> <p>Consequently there were 4 extant consents within the area edged red on the attached plan when the LDP process was commenced (but these have now lapsed). However, the principle of development on the site has been established, principally at appeal and with two 'live' consents still extant within the land edged red</p> <p>Justification for inclusion into the Settlement Limits for Pontardawe/Trebanos</p> <p>The Deposit LDP - Settlement Topic Paper (August 2013) included the following criteria for considering whether a site could be accommodated within the Settlement Boundary</p> <p><i>Stage 2: Assessing the Capacity of Land within Existing Settlements</i></p> <p><i>The second stage in the review involved assessing the capacity within the existing settlement pattern to accommodate new development.</i></p> <p><i>The initial step in this process was to incorporate any relevant boundary updates into tightly drawn settlement limits (i.e. a 'cling-film' approach). Such boundary updates involved the inclusion of the curtilages of dwellings where these were considered to be functionally and visually part of the settlement pattern and also the inclusion of any relevant extant planning consents.</i></p> <p>The site in question has two extant planning permissions as evidenced by a letter dated 17th March 2006 from the Planning Department of Neath Port Talbot County Borough Council - (See Appendix 4).</p> <p>In addition a two planning Appeals (Ref;- APP/Y6930/A/2050112 and APP/Y6930/A/2050124) granted planning permission for residential development on the land subject of appeal - Appendix 3.</p> <p>What is more significant is that the Inspector indicated in paragraph 4 of her decision letter states '<i>---In short and long distance views, and taking account of the extant planning permission for a dwelling, which I understand includes part of the western area of the site, I saw that, with careful design, siting and landscaping, the proposal would be seen as a logical continuation of existing development and would sit comfortably and unobtrusively with the established settlement pattern</i>'</p> <p>Additionally in paragraph 6 of the decision letter the Inspector states '<i>There would be no conflict with the development plan or PPW, and although the proposals would not comply with the settlement policy of the emerging UDP, they would not be materially at odds with its overall objective to safeguard the character and appearance of the area. There are material considerations that weigh heavily in favour of the appeals</i>'</p> <p>The same consideration should therefore be given when considering the Alternative Site for inclusion within the Settlement Limits of Pontardawe/Trebanos in the emerging Local Development Plan.</p> <p>Additionally, the Settlement Topic Paper indicated that further consideration should be given to sites that provided a natural and logical extension to settlements - these included larger scale rounding off opportunities that were logical in terms of being physically, functionally and visually related to the existing settlement pattern;</p> <p>Brownfield sites located in reasonable proximity to settlements - these included brownfield sites that were logical in terms of being physically, functionally and visually related to the existing settlement pattern;</p> <p>Candidate Sites;</p>

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					<p>Sites with a planning history - including those with unimplemented planning permissions which had lapsed or had previously had planning permission refused but the reason for the refusal could now be overcome;</p> <p>Sites that would not result in the coalescence of settlements; and Sites that would not result in an unacceptable intrusion into the countryside.</p> <p>Again the site subject of this application satisfies the above criteria. The Inspector in the planning appeal referred to above accepted the principle of development on the site. The site is on former railway land hence it can be classified as Brownfield and it has a history of both implemented and unimplemented planning consents</p> <p>When determining the suitability or otherwise of sites for inclusion within expanded settlement limits, there are a number of factors which will ultimately influence where development can take place.</p> <p>The site is not important in environmental or historical terms and neither are there other constraints that might delay or prevent development were considered as well as those factors that may have a positive influence on where development occurs.</p> <p>The site is not within a Flood zone Areas, a Special Areas of Conservation (SAC), a Sites of Special Scientific Interest (SSSI) nor a National Nature Reserves (NNR).</p> <p>The site is located within a mining area and a mining report dated 12th July 2012 is attached at Appendix 5.</p> <p>It is considered that the site can be incorporated into the settlement pattern in this area of Trebanos without impacting on the provisions of the emerging LDP or PPW. The proposal satisfies the criteria for sites set out in the Settlement Topic Paper and for the above reasons should be included within the settlement of this part of Trebanos.</p> <p>Paragraph 9.5.2 (page 102) of the Population and Housing Topic Paper (August 2013) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) of the same Paper under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Settlement Topic Paper (August 2013)</p> <p>9.0.3 With the exception of Dormitory settlements, all settlements have defined limits. Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>9.0.4 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy, but in areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy.</p> <p>The two appeal decision referred to above and the extant planning permissions contained within the site appear to satisfy the criteria set out by the Local Planning Authority in the Draft LDP as indicated above.</p> <p>The Settlement Topic Paper (August 2013) gave an indication as to how the Planning Authority would assess the status of particular site that were to be included within Settlement Limits. These included:-</p>

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					<p>a. Sites that represented small scale infill opportunities.</p> <p>b. Sites with existing planning permissions that remain undeveloped.</p> <p>c. Derelict land.</p> <p>The site subject of the current application for inclusion within the settlement limits satisfies the three criteria set out above.</p> <p>Population and Housing Topic Paper (August 2013)</p> <p>9.5.2 The majority of the new housing units will be delivered through the development of specific housing sites identified within the plan whilst allowances for the emergence of windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>Conclusion.</p> <p>The proposed site if included within the Settlement Limits will allow for the managed expansion of the settlement of Pontardawe/Trebanos in a sustainable location with good access to both the areas of Swansea, Neath and Port Talbot Town Centres and the more local available facilities.</p> <p>Development of the site would help support the facilities and services in Pontardawe/Trebanos and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth' of this particular area</p> <p>Local Planning Authority considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Pontardawe/Trebanos as defined by the Local Planning Authority and it should be included within the Settlement Limit.</p>
Dep1342	Lucy and Patrick Murray		787464	Object	<p>Land at Rutherglen Yard, Felindre (Site B)</p> <p>Site History</p> <p>The site was assessed as a candidate site in the LDP Candidate Site Assessment Report ('the Report'). It comprises of 1.4 hectares of land and reference to it is to be found at page 81 of the Report. The reasons for not including the site within settlement limits are that 'whilst located adjacent to the existing settlement, if developed, would be considered as an urban expansion into the existing countryside. The land adjacent to the settlement is also steeply sloping and access to the main road would be problematic'.</p> <p>The site is currently within settlement limits as a result of the Inspector's recommendation in the Public Inquiry into the objections made to the Neath Port Talbot Deposit Unitary Development Plan. Neath and Port Talbot County Borough Council (NPTCBC) had sought to exclude the site from settlement limits on the basis that it was open countryside and for highways reasons. After hearing the representations and seeing the evidence presented for both sites the Inspector came to the following conclusion:</p> <p>'The land plays a role in the local landscape and provides a habitat for wildlife. It is, however, reasonably well situated in relation to local facilities and its loss would not disrupt the landscape setting. Whilst its development would pose difficulties as a result of it being a sloping site any proposal would have to satisfactorily address the site planning issues. The Inspector does not recommend that it be included as an allocated housing site rather than it be included within Settlement Limits. Any proposal would have to satisfactorily address site planning issues, including access and the protection of landscape and wildlife features'.</p> <p>The Inspector's recommendations were accepted by NPTCBC and the land was included in the Modifications as an addition to Settlement Limits in the UDP.</p> <p>It is clear therefore that the Inspector specifically considered whether the site if developed would be considered an urban expansion into the countryside</p>

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					<p>and decided that it would not be. NPTCBC accepted this in 2008.</p> <p>No reasons or evidence has been provided as to why when it was agreed by NPTCBC a short time ago that the site was not 'countryside' they now consider it to be so. No reasons or evidence has been provided as to why when it was agreed by NPTCBC that in principle highway issues could be overcome they now consider access to be problematic.</p> <p>It is a cornerstone of public law that government decision-making should be rational, consistent and not arbitrary. In the absence of a change in the definition of 'countryside' or compelling new evidence in relation to the site there can be no rational or sustainable reason for the change in settlement limits excluding the site. Its exclusion therefore fails the tests of consistency and coherence and effectiveness.</p> <p>For the avoidance of doubt, once the reasons for the exclusion from settlement limits fall away, (and it is submitted they must), the site can be seen to fulfil the sustainability and other key policy criteria set out in the Deposit LDP.</p> <p>LDP - policies - reasons why the site should be included within settlement limits</p> <p>The Development Strategy and Spatial Strategy (paragraphs 2.3.11 and 2.5 LDP). The area along the coastal corridor and the urban areas of Neath and Port Talbot are the focus of development. The site falls within this area. The site is within the top tier of the Settlement Hierarchy set out at Table 8.1 of the Settlement Limit Topic Paper and has been therefore identified by NPTCBC as within an area which is the most sustainable location.</p> <p>Social and Environmental Consideration The site has been held not to be an incursion in to open countryside and there is no flood risk.</p> <p>Economy and Employment The site has excellent connections to M4 and Junction 40, minutes away by car. It is within walking and cycling distance of the town centre. There are also excellent transport connections.</p> <p>Sustainable transport The Core network includes the A4107 which abuts the site (5.4.8). This route has been identified in the Regional Transport Plan as part of the Regional Strategic Highway Network consisting of major roads providing key routes through the County Borough. The proposed development of the site will not have an adverse effect on the existing highway network as the Highway Authority have accepted that the new proposed access is technically possible and is an improvement on the existing junction from Bay View. The site is within a walking and cycling distance of the city centre and in existing bus routes.</p> <p>Overarching policies The site comes within the top tier of the Settlement Hierarchy for Neath Port Talbot (Sustainable Communities Table 3.1). It is therefore in the most sustainable location. The site is currently within settlement limits and the decision to include it was made after hearing detailed representations, with the acceptable by the Highway Authorities of a new proposed access from the A4107 and after consideration of an ecological report. Nothing has changed since the last assessment was made to make the site less sustainable. The development of the site would present and enhancement and improvement of the settlements to the north, east and south. The allotment land is currently covered in scrub and impenetrable. New development would maintain mature trees and provide green spaces. It would be a visual improvement on the dense scrub that covers the areas. Any development would not result in the loss of existing community facilities.</p> <p>Area based policies The Coastal Corridor Strategy Area The majority of new residential is to be along the Coastal Corridor and the site lies within this area (4.0.2).</p> <p>Topic Based Policies (in so far as they are relevant) Open Space The proposed development would not lead to a loss of open space.</p>

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					<p>Environment and Resources</p> <p>The site is densely covered with scrub vegetation such as bramble, willow and bracken. No investigation of soils has been conducted but it seems unlikely that the land is of agricultural value. The ecology report conducted by NPTBC for the Public Local Inquiry in August 2005 concluded that the land held little ecological interest and there were no constraints to development. According to the Ecology Report prepared by NPTCBC in 2005 there may be protected species but the report was not conclusive on the presence of these animals. There are some trees on the site but it is mainly covered in bramble, willow and bracken. All native mature trees would be retained as recommended by the Ecology Report 2005. There would therefore be no adverse effects of development.</p> <p>According to the LDP Deposit Plan Map the site comes within a Safeguarded Mineral Resource are Category 1 Sand and Gravel Resource but the objectors have seen no evidence for this nor any reasoning in any document produced by NPT for this categorisation.</p> <p>Housing allocation. It is submitted that due to the sustainability of the site it should be included within housing allocation and within the housing site in Policy H1 (5.5.1).</p> <p>Summary</p> <p>In summary therefore the site is 'sustainable' in terms of development. It is in the most sustainable location within the Deposit Plan. It abuts the A4107 which affords excellent transport infrastructure. The area cannot be described as countryside. NPTCBC agreed it was not countryside in 2008 and included it within settlement limits; it is almost enclosed by development to all sides except the west; there is no amenity value to the land; the ecological report from 2005 shows that it has little ecological value and the Highway Authority accepted in 2005 that high safety issues can be overcome by a new access from the A4107. By reference to the policies set out in the Deposit LDP it should be included. The exclusion of the site from settlement limits is therefore indefensible as it represents a reversal of NPTCBC's inclusion of the site in 2008. There are no logical, evidential or topographical reasons for the change. It is irrational in a public law sense. The exclusion of the site from settlement limits and housing allocation fails the tests of coherence and effectiveness as the site should be allocated by reference to relevant policies. Further, the failure to allocate the site within settlement limits is not consistent with adjoining local residential land use and relevant policies, in particular sustainability.</p>
Dep1344	Mr Huw Jones		589035	Object	<p>Land to the East of Ynysymond Road, Alltwen</p> <p>We wish to see the site included within the settlement limits (Policy SC1 and Proposals Map) and subject to a housing land allocation under Policy H1. We wish to object to proposed new housing land allocation H1/25 which was deleted as a UDP allocation following adverse comments by the Inspector. Circumstances have not changed and the site does not have capacity to accommodate 50 dwellings. This has been substantiated by evidence submitted in the form of an updated Ecological Appraisal which disputes that the allocated site could accommodate 50 dwellings without major ecological impacts.</p> <p>We therefore consider that the scale of the allocation should be reduced to 25 and the numbers apportioned between that site and the site promoted. The Alternative site should therefore be allocated for 25 dwellings as per the site layout submitted which allows for the retention of ecological sensitive areas.</p> <p>1. INTRODUCTION</p> <p>1.1 Asbri Planning Limited has been instructed to submit representations on the Neath Port Talbot Deposit Local Development Plan. This follows a previous candidate site request that land to the east of Ynys Y Mond Road, Alltwen, Pontardawe (Ref P46), be considered as a proposed housing land allocation, and our subsequent comments on the Preferred Strategy and Stakeholder consultation stages.</p> <p>1.2 Despite the site having been recommended by the previous Unitary Development Plan Inspector in her Report as a potential replacement for a deleted site to the west of Ynys Y Mond Road, it is disappointing to note that the site has not emerged as a favoured option. Indeed, in considering potential sites in Pontardawe, the previously rejected site (to the west of Ynys Y Mond Road - Ref H1/25) rather than the submission site, is now proposed to be allocated for 50 dwellings in the Deposit Plan.</p> <p>1.3 Comprehensive supporting evidence was submitted at both the Candidate Site and Preferred Strategy stages, which demonstrated that the site could be adequately accessed, together with Landscape and Ecology studies which sought to confirm that the site could be appropriately developed whilst addressing nature conservation and visual aspects. A Concept Layout was also submitted at the Stakeholder Deposit Stage which showed that a scheme</p>

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					<p>for 25 dwellings could be accommodated which preserved those parts of the site which are most sensitive in ecology and landscape terms.</p> <p>1.4 Section 2 of this submission describes the site. Section 3 provides representations on the Plan Strategy; Section 3 discusses the Overarching, Area and Topic Based Policies; Section 5 provides a comparison with the site proposed to be allocated; Section 6 discusses the Sustainability Appraisal Self Assessment; and Conclusions are made in Section 7.</p> <p>2.0 SITE DESCRIPTION</p> <p>2.1 Location</p> <p>The site is located to the east of Ynys Y Mond Road, some 500 metres to the south west of the centre of Alltwen and approximately 1.5 kilometres south-east of the centre of Pontardawe.</p> <p>2.2 Site Description</p> <p>The site, with a gross area of approximately 3.87 hectares, comprises several field parcels which are in use as pasture land, on a moderate slope facing north-west. It is contained along the south-western boundary by a belt of mature trees and woodland. To the west it slopes down to properties along Ynys Y Mond Road, which forms a linear pattern of existing detached and semi-detached dwellings extending south west from the main settlement of Alt Wen.</p> <p>2.3 Directly to the north of the site, occupying a level area of land is a rugby club pavilion and adjacent pitch. Between the pavilion and properties along Ynys Y Mond Road is a slightly elevated 'plateau' area intended as a training pitch but now overgrown. Beyond this is the Nant Llechau stream which runs in an incised channel along the north of the rugby pitch.</p> <p>2.4 Access</p> <p>Access to the site can be achieved via the gap between properties along Ynys Y Mond Road, where agreement for widening has been provisionally agreed with adjacent residents, who in turn would benefit from improved rear access. Signed agreements to this effect were submitted to accompany the original candidate site request and continue to apply.</p> <p>3.0 REPRESENTATIONS ON THE PLAN STRATEGY</p> <p>3.1 Section 2 - The Strategy is supported, in particular the Area Based Objective OB6, i.e. 'Reinvigorate the Valley Areas and improve economic prospects recognising the role of Glynneath and Pontardawe in delivering sustainable growth.'</p> <p>3.2 Objective OB7, which seeks to 'Provide an adequate supply, mix type and tenure of housing within sustainable settlements to meet the needs of the projected population' is also supported.</p> <p>3.3 The Development Strategy of the Plan identifies Pontardawe and the Upper Neath Valley as a Strategic Growth Area in the Valleys which will create a mechanism to co-ordinate investment and ensure that the benefits of growth and regeneration are shared more widely throughout the valley communities. This is also acknowledged and supported as it seeks to facilitate growth in the Pontardawe area.</p> <p>3.4 In the above context, Paragraph 2.5.3 identifies Pontardawe and Glynneath as the most sustainable settlements in the Valleys to focus development. Paragraph 2.5.38 confirms that the town of Pontardawe is the 3rd largest settlement in the County Borough and the largest settlement in the Valley areas. Paragraph 2.5.41 goes on to state that Pontardawe has the ability to accommodate demand for the additional elements of new housing development.</p> <p>3.5 Whilst the above elements of the Plan can be considered sound, the means by which these aims are intended to be achieved are disputed. We shall therefore see in our following comments on the Overarching, Area and Topic Based Policies</p>

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					<p>4.0 REPRESENTATIONS ON OVERARCHING, AREA AND TOPIC BASED POLICIES</p> <p>4.1 Following our comments in the previous section we support the identification of Pontardawe as a Town in the classification of settlements as proposed for the Valley areas. In this respect we also support the identification of Alltwen as a 'Small Local Centre'.</p> <p>4.2 We object however, to the level of new development associated with the proposed allocation H1/25, as the site previously promoted, to the east of Ynysymond Road, Alltwen is not proposed as a housing land allocation. This is despite previous evidence submitted at the Candidate Site stage, the Pre Deposit, Preferred Strategy stage, and the Stakeholder Deposit Plan stage which demonstrated that the site could be delivered, with ecology, landscape and highway issues resolved. A draft layout for 25 dwellings was also submitted which showed how the development could be accommodated.</p> <p>4.3 It is surprising therefore that the site to the west of Ynysymond Road (H1/25) is proposed to be allocated for 50 dwellings given the previous Unitary Development Plan Inspector's recommendation that the site allocation, then H1/36, be deleted.</p> <p>4.4 The Inspector's comments as regards this site are outlined below.</p> <p>"The objection site extends southwards from the narrow, wooded valley of Nant y Llechau in a series of open fields, half-encircled to the west and south by Derwen Road and bordered on its eastern side, at a higher level, by residential properties fronting Ynysymond Road. The site, measuring approximately 4 hectares, is allocated for 40 dwellings. This represents a much lower density of development than the rate of 30 dwellings per hectare promoted by UDP Policy H2 would suggest. The landowners object that the allocation figure is too low. However, highway evidence suggests that only 25 dwellings could be satisfactorily accessed, and ecological evidence suggests that far fewer than this could be built without threatening the particular ecology of the area. A recently-constructed infill group of dwellings on the Ynysymond Road frontage has dealt with earlier drainage problems."</p> <p>4.5 The Inspector's Report went on to state that:</p> <p>"Within the Ynysymond Road frontage group, a gap has been left to allow for a 5.5m carriageway with a footway on either side. That potential access is adequate to serve no more than 25 dwellings. A secondary access to Derwen Road would be necessary to allow more than 25 dwellings on the allocation site. However, Derwen Road is a narrow lane and its junction with Ynysymond Road is inadequate in terms of visibility, gradient and alignment. At its northern end, the lane serves existing residential properties. These already exceed the number which the lane is adequate, according to current standards, to serve. If development were to bring more vehicular traffic onto the lane, pedestrian safety would be threatened. Moreover, to form an access onto Derwen Road, and to provide the necessary visibility, would cause severe disruption to the hedge banks. These are rich in species and as a habitat, and are of particular ecological value. They are classifiable as Ancient and Species-Rich Hedgerows under the UK (and NPT) Biodiversity Action Plans, and impose a strong constraint upon development. No scheme utilising Derwen Road would offer satisfactory access."</p> <p>4.6 The Inspector concluded that:</p> <p>"There is only a single field, at the southern apex of the site, which does not carry a strong ecological constraint. However, to develop this field in isolation would result in an awkward if not actually fragmented pattern of development. It would impose a concentration of development at the farthest point away from the village centre, and would insert a new 'leading edge' of potential conflict both alongside the hedge bank and projecting on 2 fronts into those fields which constitute the valuable habitats. On balance, the objections against the allocation are supported."</p> <p>4.7 In terms of the site being promoted, however, she had the following comments to make:</p> <p>" The proposal would extend built development onto the north facing valley slope of Nant y Llechau, which currently serves as the settlement limit in this part of Alltwen. However, the site is not uncharacteristically or intrusively elevated, and its visual impact upon the Swansea Valley could be softened by landscaping."</p> <p>4.8 The UDP Inspector went on to report that:</p> <p>"The constraints of flooding, ecology, or separation of settlements to which other potential sites are subject to, do not apply to this site, and it merits</p>

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					<p>further consideration. However, there is insufficient evidence to demonstrate that the 3.87 hectare site could be suitably accessed. Consequently the objection is not supported. However, in view of the recommendation of this Report on the Allocation Site H1/36 (Ynysymond Road) the Council may wish to consider the objection site further, in more detail, as a potential replacement."</p> <p>4.9 On that occasion, however, the Council took the view that with the release of windfall sites elsewhere in the Swansea Valley area, no "pressing need" existed to allocate the site.</p> <p>4.10 The Inspector's concern regarding access has, however been resolved from the drawings previously submitted and the agreement of residents either side of the proposed access road to release strips on land in exchange for rear access provision.</p> <p>4.11 In view of the above we do not object to the proposed new Housing Allocation H1/25 in principle, but we object to the number of dwellings proposed - 50 dwellings. This is on the basis that, for reasons discussed above, and in subsequent sections of this document, we dispute that the site could accommodate 50 dwellings without significant impacts on ecology.</p> <p>4.12 We also object to the non inclusion of the subject site despite the level of supporting information previously submitted, where my client has expended considerable resources on commissioning the various studies.</p> <p>4.13 On the site being promoted, we have already established that, in order to allow for the protection of the most ecologically sensitive parts of the site, a reduced scale scheme of 25 dwellings has been derived. As a potential compromise in view of the limited capacity of the allocated site, we propose that the Council could reduce the proposed allocation to 25 dwellings and the numbers apportioned between the two sites. This would achieve a more balanced form of development by limiting growth on either side of Ynysymond Road to 25 dwellings.</p> <p>5.0 COMPARISON WITH ALLOCATED SITE</p> <p>5.1 In view of concerns expressed regarding the proposed housing land allocation, H1/25, not only by the previous LDP Inspector, but also by the Council's own assessment of the site, an updated Ecological Appraisal of the site being promoted was commissioned, along with some desktop comparison with the site proposed to be allocated.</p> <p>5.2 The resulting Appraisal establishes beyond doubt that with proposed development confined to the area of semi-improved grassland, which has limited ecological value, together with the adoption of the recommended measures, the Capacity Layout as proposed would represent a viable, deliverable alternative site for residential development.</p> <p>5.3 The Appraisal goes on to conclude that the ecological constraints associated with the allocated site to the west (H1/25) are such that the development of the whole area to provide 50 residential units is unlikely to be achievable.</p> <p>5.4 The work confirms that the premise put forward in these representations, i.e. that a combination of the two sites, i.e. the proposed allocation, and the site being promoted, could, in combination, provide for the required housing land supply whilst adhering to environmental policies, including EN 7, in the Deposit Draft Local Development Plan.</p> <p>5.5 The Landscape and Visual Impact Assessment, carried out in 2009, was undertaken on the basis of the whole site being allocated. It concludes that the site is well related to the urban form of Alltwen and could strengthen the original nucleated character of the settlement. The site is contained by a strong pattern of woodland and hedgerows from the main body of "green wedge" land to the south. For these reasons, we believe that this Site, with appropriate master planning, would be acceptable in landscape and visual terms for development.</p> <p>5.6 With parts of the site being kept free from development, the visual impact will be reduced further, and this is referred to in the Sustainability Appraisal discussed in the following section.</p> <p>6.0 SUSTAINABILITY APPRAISAL OF ALTERNATIVE SITE</p>

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					<p>6.1A Sustainability Appraisal of the site, using the Council's 'Traffic Light' methodology has been carried out. In particular, we compare the proposed 'Alternative Site' being promoted with the proposed allocation H1/25.</p> <p>6.2The site proposed to be allocated has only a single Green score (Positive), 9 Amber scores (Neutral), 2 Red (Negative) and 1 ? (Uncertain). The two red scores relate specifically to the biodiversity concerns.</p> <p>6.3 By contrast the reduction of the site area on the promoted site, combined with appropriate mitigation would have no impact on biodiversity and would have potential to improve connectivity etc. Therefore the negative scores on the allocated site would be positive scores on the alternative site.</p> <p>6.4 Unlike the allocated site there is no flood risk, the site is closer to facilities, and rear access would be provided to residents to achieve community benefits. The one positive score for the allocated sites relates to landscape impact. Whilst the alternative site lies at a higher level, a previous Landscape and Visual Assessment Report, established that visual impact would be low. The study was carried out at an earlier stage in the site promotion process when the whole of the site was proposed to be developed. Consequently we consider apposite score should be attributed n landscape grounds.</p> <p>6.5 By contrast with the allocated site, therefore, the alternative site promoted has 7 positive scores, 6 neutral and no negative scores. This illustrates the degree to which the site assessment process has unduly favoured the site now proposed for development. It also bears out the previous UDP Inspector's views.</p> <p>6.6 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>7.0 CONCLUSIONS</p> <p>7.1 This Submission has been prepared on behalf of the proposer who is promoting land for residential development on land to the east of Ynys Y Mond Road, Alltwen, Pontardawe.</p> <p>7.2 In the Deposit Plan, the site is not favoured for development which would meet the housing needs of the Pontardawe area in the emerging strategy. This is in spite of its positive consideration by the Inspector at the UDP Inquiry, and supporting evidence which has been submitted at the candidate site stage, and the 'Stakeholder' Deposit stage, which demonstrated how landscape, ecology, access and layout issues could be addressed.</p> <p>7.3 Consequently we wish to object to the 50 units proposed in the housing land allocation H1/25 which was deleted as a UDP allocation following adverse comments by the Inspector. Circumstances have not changed and the site does not have capacity to accommodate 50 dwellings.</p> <p>7.4 In the above context we consider that the scale of the allocation should be reduced and the numbers apportioned between that site and the site promoted by my client. This has been substantiated by evidence submitted in the form of an updated Ecological Appraisal which disputes that the allocated site could accommodate 50 dwellings without major ecological impacts.</p> <p>7.5 We therefore contend that the Plan as it stands fails to meet the prescribed Tests of Soundness CE2 and CE4 as quoted below. CE2 - The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base. CE4 - It is reasonably flexible to enable it to deal with changing circumstances.</p> <p>7.6 In light of the above, it is, therefore, considered that Neath Port Talbot County Borough Council should, in making future Focused Changes, take these representations into account and identify land to the east, in combination with, land to the west, of Ynys Y Mond Road, Alltwen, Pontardawe as a housing land allocation site for 25 dwellings which is deliverable in terms of access and addressing environmental issues.</p>
Dep1349	Mr Dennis Harris		787756	Object	<p>Land to the rear of Greenwood Drive, Cimla</p> <p><u>Proposed use of the site</u></p>

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					<p>This submission is to be considered by the LA planning department for inclusion in the LDP with a designation for housing. An assessment of the existing settlement boundary is requested with a view to including the area identified.</p> <p>The site is well located strategically with good transport links via public transport, nearby trunk road and M4 motorway network.</p> <p>It is requested that the area of land concerned be considered for housing and not green wedge as in the current UDP, as the site is logically located to provide necessary expansion to Cimla with the existing argument for retaining as green wedge should not be considered necessary to prevent the coalescence of settlements.</p> <p>The site forms a natural rounding off of the existing established settlement, development of the land would maximise use of the urban area linking the existing eastern school boundary with the residential area to the North.</p> <p>The site is immediately available for development.</p> <p>Any loss of POS due to access infrastructure will be replaced within the candidate site.</p> <p>The preferred density of proposed housing in the NPT area is in excess of 30 units per hectare (refer to Appendix E- 7.5.22 Strategic Policy 6), which would suggest a capacity in excess of 60 units. With development of this size (over 50 units), the authorities preference would be the provision of more than one point of vehicular access onto the site, however this may be difficult given the surrounding built environment. Therefore the land owner will be pleased to enter into negotiation with the planning authority with regard the redesignation of a smaller area of land, a lower development density, or the relaxation of the single access arrangement.</p> <p>The proposed development will strive to assist the authority in its aim to provide more affordable housing (see Appendix H 7.5.25 Strategic Policy 7), by considering a mixed residential typology suitable for a variety of prospective purchasers. It will also assist in the provision of land to accommodate a proportion of the 240 units required for the Neath area (see Appendix J 7.4.4.2).</p> <p>We request that the authority give due consideration to the proposal and provide a coherent response. The application site is very similar in nature and location to the previously included Grove Road site.</p> <p>The land owner is open to discussion with regard the process of development. The parcel of land, in part or in its entirety, will provide an attractive development opportunity for a small / medium size developer. The land owner requests the authorities consideration of flexibility in terms of layout and density. If considered appropriate, the land owner will be willing to consider the inclusion of part of the land in the LDP to limit the number of units constructed, or preferably redesignation of the whole of the site.</p>
Dep1351	Mr B Jones		787755	Object	<p>Land at Camnant Road, Banwen (Site 1)</p> <p>Seeking allocation of new residential development site (see attached plan). Additional land is required within the settlement of Banwen. Outline planning permission previously granted for residential development on this site (ref no. P2004/0854 refers). (see attached documentation including sustainability appraisal).</p>
Dep1352	Mr B Jones		787755	Object	<p>Land at Camnant Road, Banwen (Site 2)</p> <p>Seeking allocation of new residential development site (see attached plan). Additional land is required within the settlement boundary of Banwen. Outline planning permission previously granted for residential development on this site (ref no. P2004/0857 refers). (See attached documentation, including sustainability appraisal)</p>
Dep1353	Mr M Cuddy	Cuddy Demolition & Dismantling Ltd.	787651	Object	<p>Land at Chain Road, Glynneath</p> <p>Consideration of Housing Supply by the Plan</p>

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					<p><i>Overall / Plan-Wide Housing Land Supply</i></p> <p>In regards to the supply of housing land across the County Borough over the plan period, it is noted that:</p> <ul style="list-style-type: none"> the Local Authority has based the Deposit LDP strategy on an assessment of the population growth needed to meet the projected level of economic growth, with the number of houses needed based on this. Therefore based on this growth strategy, the Plan proposes a dwelling requirement of 8,027 dwellings over the Plan period. the Local Authority has not used the growth strategy provided within the Stakeholder Engagement Deposit Plan which was based on employment growth and increased economic activity, and which provided for a dwelling requirement of 8,227 dwellings (i.e. more than proposed within the current Deposit LDP); the Authority has chosen not to use the "Moderate" growth strategy based on population data from 2005-2009, which was proposed within the Pre-Deposit Plan. This results in a higher level of housing supply than that proposed within the Pre-Deposit Plan. the Authority has chosen not to utilise the Welsh Government (WG) 2008 based projections to inform the now proposed housing land supply figures. This has resulted in a lower level of housing land supply being provided for over the plan period, as compared to those recommended to be provided for within the WG projections. <p>Indeed, there are significant differences between the WG projections, the 'Moderate' growth projections within the Pre-Deposit Plan, the Stakeholder Pre-Deposit projections and the current Deposit Plan's growth strategy. When compared, the dwelling requirements for the above can be summarised as follows:</p> <table border="1" data-bbox="1086 909 2145 1178"> <thead> <tr> <th></th> <th>Total Dwelling Requirement Over LDP Period (2011 - 2026)</th> <th>Resulting Dwelling Requirement Per Annum</th> </tr> </thead> <tbody> <tr> <td>Welsh Government 2008</td> <td>10,569</td> <td>705</td> </tr> <tr> <td>Stakeholder Deposit Plan Proposals Growth Strategy</td> <td>8,227</td> <td>548</td> </tr> <tr> <td>Deposit LDP</td> <td>8,027</td> <td>535</td> </tr> <tr> <td>Pre-Deposit Moderate Growth Strategy</td> <td>6,279</td> <td>419</td> </tr> </tbody> </table> <p>Table A Growth options summary</p> <p>As the above table confirms, whilst the now proposed dwelling requirement is higher than that provided for within the Pre-Deposit strategy, it is lower than that provided for within the Stakeholder Deposit Plan and the WG 2008 projections. The proposed level of growth is justified within the Council's Population and Housing Topic Paper (August 2013) as follows: " <i>The overall level of population and household growth is lower than the WG 2008 projections because it is based on employment growth and increased economic activity, as opposed to natural change and migration trends. The study resulted in a need for more houses but a reduced need for additional employment land when compared to the allocations within the existing Unitary Development Plan (UDP), much of which has been undeveloped for significant periods of time.</i>" (Paragraph 7.0.8)</p> <p>Notwithstanding the above, it is considered that the 2008 WG projections represent the most robust and reliable population projections and accordingly should be used as the basis for providing for Neath Port Talbot's housing land supply over the plan period. Accordingly, as there is a significant gap between the proposed dwelling requirement and the WG 2008 figures (of 2542 units), it is considered that there will be a significant shortfall in housing provision across the County.</p> <p>Planning Policy Wales Edition 5 (November 2012) states that the latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. It goes on to state (as paragraph 9.2.2) that: "<i>Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them...</i>"</p> <p>In terms of the Council's justification for deviating from the WG projections, the Council's Population and Housing Topic Paper (August 2013) states the following: " <i>The WG 2008 based projections were considered to be undeliverable as the migration assumptions on which the population projections</i></p>		Total Dwelling Requirement Over LDP Period (2011 - 2026)	Resulting Dwelling Requirement Per Annum	Welsh Government 2008	10,569	705	Stakeholder Deposit Plan Proposals Growth Strategy	8,227	548	Deposit LDP	8,027	535	Pre-Deposit Moderate Growth Strategy	6,279	419
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					<p>were based represented the 'peak' in migration and not the downward decline in migration which has since been experienced. Furthermore, the 2008 household projections indicate an average annual increase in households of 671 which past trends indicate has never been achieved in Neath Port Talbot." (Paragraph 5.0.7)</p> <p>We would dispute this and consider that this is both a flawed assumption, and that there is latent need and demand for higher rates of house building, which could likely be provided for should sufficient levels of land be provided for house building. Likewise, it is considered that recent levels of house building should not be a constraint on future levels of growth as the needs and demands of the area will change over time.</p> <p>In particular, it is considered that a number of important issues have failed to be considered in relation to the growth strategy. In particular, the level of previous development across the County does not necessarily correlate to the level of need and demand within the area. In addition, the projections underplay the level of net migration which will take place over the plan period. Accordingly, the resulting proposed level of housing supply is considered to be too low.</p> <p>In addition, these projections overplay the impact of the recent recession on future housing requirement, and do not consider the impacts of any latent demand for housing, which has been temporarily suppressed during the economic downturn. It is considered likely that a more stable economic situation may result in a future increase in housing requirements and housing growth, as those who have awaited improvements in the economic situation progress with currently dormant demands for additional / different housing requirements. Accordingly, lower building rates in recent years may result in significantly higher building rates in the coming years, as house builders aim to 'catch-up' with, and provide for, latent housing demand across the Authority. In any event the Plan period (which extends to 2026) needs to factor in patterns of demand over a considerable period, not just be based on the short term (which is universally accepted as being unprecedented).</p> <p>Likewise, it should be noted that the previous Neath Port Talbot County Borough Joint Housing Land Availability Assessments (with base dates of 1st April 2008, 2009 and 2010), confirm that the Authority had not maintained a five year land supply since 2007. Whilst the 2011 and 2012 show a supply of 5.8 years and 6 years respectively, this is due to the method of calculation (i.e. based on previous completions) and is therefore not considered to provide an accurate representation of the housing land supply (as it does not consider underlying needs). The low levels of supply, in conjunction with the recent economic downturn, has therefore further limited and subdued development rates across the County.</p> <p>Furthermore, it is considered that the LDP fails to provide for a pro-growth strategy, as advocated by Carl Sargeant, Minister for Housing and Regeneration in his recent written statement - 'Stimulating Home Building in Wales.' This confirms that the Welsh Government's main priority is to build homes. It is not considered that the housing provision proposed within the Deposit LDP would be consistent with these objectives, as it does not encourage or give priority to housing growth, but may in effect subdue it over the plan period.</p> <p>The Plan's overall supply for housing therefore underprovides as opposed to overprovides (as other Authorities are doing) - an approach which is inconsistent with the drive to re-stimulate the housing market as a result. This strategy is therefore clearly inconsistent with the objectives of the Ministerial Statement.</p> <p><i>Contingency / Flexibility Allowance</i></p> <p>It is noted, and supported, that an additional 'flexibility allowance' is proposed to be added to the proposed growth figures, to ensure that the Plan is flexible to deal with changing circumstances. Accordingly, a total of 9,150 houses are proposed to be provided over the Plan period. Support is given to the Council's acknowledgement that an additional contingency is required, but it is not considered that the proposed level of contingency is sufficient to ensure that the Plan is able to provide for changing circumstances.</p> <p>The Deposit Plan provides for a 13% flexibility allowance, which relates to an additional provision of 1,008 dwellings.</p> <p>This level of contingency is not considered sufficient to allow for flexibility if there is either a reduction in supply (some sites not coming forward) and / or increase in demand (a significant uplift in the housing market, catering for potential additional demand for new housing over and above the target identified for the period 2011-2026), over the Plan period. Furthermore, when compared with other emerging LDP's in Wales, it is clear that the</p>

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					<p>allocation for 'uplift' has been significantly underprovided for.</p> <p>In particular and so as to evidence and illustrate out case, Torfaen County Borough Council's Deposit LDP provides for a 22.2% contingency within the plan, whilst Pembrokeshire County Council have considered it necessary and correct to include a further provision over and above the routine 'contingency' to provide for flexibility for an efficient and buoyant new housing market within their LDP. Within the Pembrokeshire County Council Deposit LDP (December 2010) a contingency of 20% is provided for permissions that are not implemented - but in addition (and over and above this), a further 5% contingency is included within the plan "to provide flexibility for efficient and buoyant housing market". It is considered that an additional contingency (as utilised by Pembrokeshire County Council) to make allowance for a buoyant housing market would be appropriate, and moreover beneficial, to include within the emerging Neath Port Talbot LDP.</p> <p>It is noted that in this regard, the Council states the following within the Population and Housing Topic Paper (August 2013): <i>A 13% 'over provision' has been factored into the housing figures to allow for an element of flexibility for sites not coming forward as anticipated. If the level of growth were to increase higher than anticipated and the housing market considerably picked up, there is scope for additional residential units at Coed Darcy Urban Village. The site has planning permission for up to 4000 units. Evidence shows that 2150 units will be provided over the Plan period leaving an excess of 1850 units as additional flexibility for changes in the economic situation and housing market.</i> (Paragraph 7.0.21)</p> <p>It is not considered that the proposals to provide for any additional requirements at Coed Darcy is sustainable or realistic. In particular, as discussed in further detail below, Coed Darcy will likely come forward at a steady rate, and will not therefore likely increase the rate of completions over the Plan period to account for market changes. Furthermore, the maximum development rate on Coed Darcy is already factored into the Plan, and therefore development over and above this is not considered deliverable.</p> <p>In addition, if higher growth levels are required, this will be required to be provided across the County, and should not be focussed on one site only, as this would not provide for a range of choice of locations.</p> <p>Accordingly, additional sites are required to be provided across the Plan area in order to ensure that sufficient flexibility is provided within the Plan, and to ensure the Plan aims to re-stimulate the housing market.</p> <p><i>Windfall and Small Sites</i></p> <p>Furthermore, it is noted that 23% of Neath Port Talbot's total dwelling supply is comprised of potential development from windfall sites (2085 dwellings from small sites and windfall sites), which relates to approximately 139 dwellings per annum. It is considered significantly un-sound that such a high percentage of the total housing supply relies on windfall sites coming forward for development, particularly in view of recent development rates on windfall sites.</p> <p>In particular, it is noted that within Neath Port Talbot's Population and Housing Topic Paper (2013), an average of 85 units per annum has been identified for large windfall development (on sites over 10 units) over the plan period, with an average of 54 dwellings per annum coming forward on small sites over the period for 2001/02 - 2011/2012. Within this average rate of 54 dwellings, this ranges significantly from 5 units per annum, to 130 units per annum. Accordingly, based on these trends, it is not considered that the housing provision on windfall and small sites will be developed anywhere near the level of 139 dwellings per annum anticipated and proposed.</p> <p>Furthermore, it is not considered that the historic rate of windfall and small site developments will be able to continue into the future. In particular, the key / most obvious windfall sites have already come forward and have been developed out over previous years, which has resulted in a smaller 'pool' of potential windfall and small sites being available. Therefore, as the levels of potential windfall and small sites significantly reduce, the rate of development on such sites is likely to slow dramatically, as developers find it harder to find suitable sites.</p> <p>In addition, the LDP's provision for windfalls is heavily reliant on large sites (over 10 dwellings) coming forward, with 1,275 dwellings proposed on large windfall sites. It is considered likely that higher numbers of small windfalls sites will come forward in comparison to larger windfall sites which may prove more difficult to find as the 'pool' of sites reduces. Accordingly, the LDP's provision for larger windfall sites needs to be reduced in view of</p>

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					<p>the lower levels of larger sites that are likely to come forward within the Plan period.</p> <p>It is therefore considered that the LDP significantly overestimates the levels of dwellings expected to come forward on both windfall and small sites within the LDP, which is likely to result in an underprovision in the total dwelling supply. This over reliance on windfall and small sites will therefore restrict the ability of the LDP to provide for the housing needs of the local population. Accordingly, the provision for windfall and small sites within the total dwelling supply should be reduced, which further establishes the need for the allocation of additional sites for residential development.</p> <p><i>'Performance' of other LDP's</i></p> <p>Evidence of the failure of LDP Plans to actually yield and deliver supply is no better exemplified than by the Rhondda Cynon Taf County Borough Council's Local Development Plan. This Plan, despite having been relatively recently adopted, has failed to ensure an adequate supply of housing land for the County Borough.</p> <p>This is highlighted within the most recent Joint Housing Land Availability Study published for RCT (2012 Study Report - December 2012) records a housing land supply position of 4.5 years - below the required 5 year supply (even though the Plan is only a few - 2 - years 'old' - having been adopted in March 2011).</p> <p>The following extract from the 2012 RCT JHLAS is relevant: "<i>The adoption of the Local Development Plan (LDP) in 2011 resulted in the first major release of new housing land in Rhondda Cynon Taf in 30 years. Yet, the 5-year land supply was only 5.3 years in 2011, and one year on, is now below the required level of 5 years at 4.5 years</i>"</p> <p>In terms of the 'cause' of this undersupply, the following extract is relevant: "<i>This is partly a reflection of the proportion of brownfield land in the supply, where a longer lead-in time between planning permission and development is required to allow for remediation of the land. It is also partly a reflection of the difficult economic conditions that have persisted since 2008 in Europe, the UK and Wales. Whilst the situation is more stable than in 2008-2009, recovery appears to be inhibited by continuing economic uncertainty in the Euro zone</i>"</p> <p>Like the proposed NPT LDP - which is based on a number of large brownfield sites, the RCT LDP is heavily reliant on strategic, brownfield sites: many of which have not come forward (at all or at a much slower rate than anticipated and needed). This therefore makes the case for additional housing allocations - particularly on greenfield sites.</p> <p>In any event, the persistent "<i>difficult economic conditions</i>" recognised by the 2012 RCT JHLAS and identified by it as a cause for the under-performance of the RCT LDP is cause in itself to increase the contingency / flexibility allowance yet further.</p> <p>This is further confirmed by the position of Caerphilly CBC, who despite having an LDP recently adopted in November 2010, have only a 3.5 year housing land supply (as per the November 2012 JHLAS). In view of this, the Council are now looking to undertake a review of the LDP to address the land supply issues and allocate new housing sites that are capable of being delivered. In particular, Caerphilly have recognised that their brownfield focussed LDP sites are not being developed at the expected rate, and accordingly, the allocation of additional greenfield sites will need to be considered - in recognition that these will provide deliverable sites that will likely attract house builders to the area.</p> <p>Therefore, in terms of the NPT LDP it is considered that an increased flexibility allowance, including greenfield sites, should be provided within the Plan in order to ensure that a range of deliverable sites are provided and brought forward. This will ensure that the lessons / experience of other LDP processes are not disregarded and that the pitfalls and mistakes that have been made are heeded.</p> <p>Assessment of the Spatial Options & Valleys Strategy Area</p> <p>As outlined within the Deposit Plan, the Plan's spatial strategy seeks to focus new development on the coastal/M4 corridor whilst reinvigorating the Valley Communities. As stated at Paragraph 2.3.11 and 2.3.12: "<i>The Development Strategy aims to: Facilitate growth within Neath Port Talbot, with a focus on the Coastal Corridor whilst reinvigorating the Valley communities. This means: Identifying Pontardawe and the Upper Neath Valley as strategic growth areas in the Valleys</i>".</p>

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					<p>This strategy is supported, as it recognises the need to achieve a balance in terms of housing provision, whilst ensuring that sufficient development is provided within the Valley communities to provide for their continued regeneration.</p> <p>The LDP strategy seeks to reinvigorate the Valleys principally through the identification of two growth areas i.e. Pontardawe and the Upper Neath Valley. As set out within Paragraph 2.5.3, within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements where appropriate growth should be focused: <i>"Within the Valleys, Pontardawe and Glynneath are identified as the most sustainable settlements in which to focus development to ensure benefits of growth and regeneration are shared more widely throughout the valley communities"</i>.</p> <p>The sustainability credentials of the settlement of Glynneath in particular are outlined in Paragraph 4.0.30 of the Deposit LDP: <i>"Glynneath is the key settlement in the upper Neath Valley and has good links to the upper Dulais Valley and the Brecon Beacons National Park as well as to Neath and the Coastal Corridor Strategy Area via the A465 (T) Dual Carriageway. Significant growth in the Glynneath Area / Upper Neath Valley will therefore benefit the wider area and enhance the sustainability and attractiveness of both Glynneath and Resolven"</i>.</p> <p>Although Glynneath is identified as a Strategic Growth Area, it is not considered that a high enough level of housing is focused within the settlement of Glynneath to achieve the significant levels of growth and development that is anticipated (i.e. as required to generate the associated positive impacts in terms of the benefits of regeneration more widely).</p> <p>It is considered that a more equitable allocation of housing within the two key settlements identified as most appropriate within the Valleys (i.e. Pontardawe and Glynneath) is required in order to ensure that the benefits of growth are distributed evenly throughout the Valleys area. Although Glynneath is identified as a Strategic Growth Area there are only a total of 4 housing sites allocated - such a low level of housing provision within this Strategic Growth Area is considered to jeopardise the aims of the LDP strategy.</p> <p>Within Pontardawe, a total of 614 dwellings are allocated. However, less than half this number of dwellings are allocated in Glynneath (i.e. a total of just 264 dwellings are allocated over the plan period).</p> <p>The largest housing allocation within Glynneath is at Park Avenue. The deliverability of the residential units at this site (particularly in the short to medium terms) is considered doubtful, as the housing allocation forms part of the wider Park Avenue Mixed Use Regeneration Scheme. The scheme relies on the collaboration of a number of parties (both public and private sector) and is considered unlikely to come forward over the short to medium term - thereby further reducing the availability of new housing in the Glynneath area.</p> <p>Assessment of the Suitability of the Proposed Alternative Site for Development</p> <p>As outlined above, these representations put forward the site at Chain Road as an Alternative Site, in recognition of its suitability to provide for residential development (the site area is approximately 2.8 hectares). The site is considered to be suitable for residential development for the following reasons.</p> <p><i>Accordance with LDP Strategy</i></p> <p>The site is located within a highly sustainable location within the existing settlement of Glynneath. As the LDP strategy contends, Glynneath is considered to represent a sustainable settlement in which development should be focused (to ensure the benefits of growth and regeneration are shared throughout the valley communities). The development of land within the settlement of Glynneath for residential development (including affordable housing) is therefore considered to be in accordance with the LDP strategy, and will assist in stimulating the regeneration of the Upper Neath Valleys.</p> <p><i>Positioning of Site within Existing Residential Settlement</i></p> <p>At present, the site is bound by physical development on all sides i.e. the site is bound by Chain Road and existing residential development to the north and east; by the B4242 to the west; and by the River Neath and A465 trunk road beyond to the south (and as such, the site is located within the boundary of settlement limits within the currently adopted UDP). Furthermore, the land located beyond the B4242 to the west of the site comprises the Glynneath</p>

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					<p>Business Park which has an extant planning permission for the construction of a Primary Health Care Facility.</p> <p>The site is therefore bound by development on all sides - with additional development proposed (and approved) further to the west of the settlement (i.e. incorporating the Primacy Health Care Centre). The boundary of the settlement limit of Glynneath therefore logically follows the extent of development to the west of the Alternative Site.</p> <p><i>Brownfield / Previously Development Land</i></p> <p>The site comprises previously developed / brownfield land (the development of which is encouraged in advance of greenfield land). The site represents a significantly underused parcel of land, which is also located within a highly sustainable settlement. Its redevelopment and re-use for housing cannot therefore be overlooked.</p> <p>It is considered that residential use of the site would be the most appropriate use, being compatible with the primary residential use of the surrounding area. As stated above, the site currently comprises a brownfield site which is currently considered to present an eyesore in its current unkempt condition - the development of the site for a high quality and well planned residential development presents the opportunity to remove this eyesore; substantially upgrade the appearance of the site; and bring this underused parcel of land back into productive use.</p> <p><i>Highways / Accessibility</i></p> <p>The site is accessible directly off Chain Road, which connects to the B4242 to the north. Highway capacity studies have identified that the development of the site for residential development (approximately 50 units) presents no issue in terms of the nearby highway network accommodating the resulting traffic movements. Initial discussions with the Council's Highway Department have indicated that there are no highways issues associated with the residential development of the site.</p> <p>In addition to the site's highly accessible location by car, the site is also well served by public transport. The site is located within approximately 160m of a bus stop along the B4242. This bus stop is served by a regular bus service (approximately half hourly) between Glynneath, Neath and Swansea i.e. the X5, 161 and 906 services.</p> <p>Existing public footpaths within the vicinity of the site are in good condition and are well-lit - these footpaths provide direct pedestrian access from the site into Glynneath, as well as to the surrounding communities of Blaengwrach, Cwmgwrach and Aberpergwm.</p> <p>In terms of provision for cyclists, the Neath section of the National Cycle Network Route 46 is open between the B4242 / Glynneath Link Road priority junction and Clyne along the Neath Canal. The route is traffic free from this junction to Resolven (then continues on-road). In addition, there is an existing Local Route that runs from the site to Blaengwrach and Cwmgwrach (via Chain Road), which also links into National Route 46 at the B4242 / Glynneath Link Road priority junction.</p> <p><i>Community Facilities</i></p> <p>The site is well served by a range of existing local services and facilities - by nature of its positioning within an existing residential area. It is therefore located within convenient walking distance of a number of community facilities. For example, within 400m of the site (i.e. easy and convenient walking distance), the following facilities are located:</p> <ul style="list-style-type: none"> • Leisure Centre • Convenience Shop • Two takeaways • Hairdressers <p>In addition to the above facilities, within approximately 10 minutes' walk is the district centre of Glynneath, which provides a full range of services and</p>

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					<p>facilities - including a post office / banks/ various shops / cafes / public houses etc.</p> <p>In regards to education provision, there is a primary school located within 0.4 miles of the site (Blaengwrach Primary School), as well as a Welsh medium primary school within 0.9 miles (Ysgol Cwmnedd).</p> <p>The Glynneath Clinic is located within 0.7 miles of the site. In addition, a new Primary Health Care Facility has planning permission for development on land immediately adjacent to the site.</p> <p>The area immediately surrounding the site has many attractive walking and cycling routes which allow access to the picturesque landscape and scenery the area has to offer in addition to a variety of existing sports, leisure and community facilities. In particular, there is a leisure centre (with associated recreational space) located within approximately 160 metres of the site (2 minutes walking distance).</p> <p><i>Employment</i></p> <p>The strategically located settlement of Glynneath is situated along a key transport corridor, with the A465 (T) linking the Heads of the Valleys Road and the Midlands to Neath, Swansea, Cardiff and West Wales. Its location allows the town to provide cross valley links, serving a range of settlements from both the Neath and Dulais Valley. Glynneath has a range of employment opportunities focused around the existing retail centre, village workshops, tourism industry and mineral operations that are still present in the Neath Valley.</p> <p><i>Flood Risk</i></p> <p>Part of the Alternative Site is located within Flood Zone C2 as outlined on the Technical Advice Note (TAN) 15 Development Advice Map (DAM). A Full Planning Application for residential development is currently being prepared, and as part of this application, a Flood Consequences Assessment (FCA) is being undertaken. As part of the FCA, a developable site area has been identified (in line with TAN 15 requirements). It has been evidenced as part of the FCA that approximately 50 units can be accommodated on the developable area of the site in line with the requirements of TAN 15 i.e. the development will have adequate protection; the consequences of extreme flooding will be acceptable and manageable; and flood risk to third parties will not be exacerbated.</p> <p><i>Services</i></p> <p>The site is vacant, other than an electricity substation compound bounded by a palisade fence located within the western portion of the site which is served by overhead and underground cables. Discussions have been held with Western Power Distribution and an on-site meeting held, which has established a way forward for the development of the site, in terms of the relocation of all equipment. Existing Western Power services will be diverted, with existing overhead services being relocated underground at the site boundary and obsolete equipment removed. To confirm, initial investigations with all services providers (i.e. Welsh Water; Wales & West Utilities; Western Power Distribution; and BT) have not identified any constraint to the development of the site. In addition, initial investigations with all providers (have established that the site is able to be served by existing utilities infrastructure.</p> <p><i>Ground Conditions</i></p> <p>A Ground Conditions Desk Study Report has been prepared for the site - this has not identified any ground conditions that would preclude the site's development.</p> <p><i>Environmental Health / Amenity</i></p> <p>The development of the site will not create a potential nuisance in terms of air, light, noise or waste.</p> <p><i>Ecology</i></p>

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					<p>A Phase 1 Habitat Survey has been carried out on the site. This has not identified any important habitats or species on the site. However, in light of the presence of the River Neath within close proximity of the site, it is assumed that wildlife utilise the river corridor. The site layout for the residential development of the site has therefore incorporated appropriate mitigation measures accordingly.</p> <p><i>Economic Viability</i></p> <p>There are no economic constraints which will affect the development of the site within the plan period. The site is in the sole ownership of the Representee, and the landowner is in agreement with the proposed land use of the site. There are no restrictive covenants relating to the use of the land, and it has been established and confirmed that the site is able to be served by existing utilities infrastructure.</p> <p><i>Summary</i></p> <p>To summarise, the site comprises of an underused parcel of previously developed / brownfield land, located within the highly sustainable settlement of Glynneath, which is served by a wide range of local services and facilities, and is easily accessible by public transport. Investigations have identified that there are no insurmountable constraints to the development of the site - the site is therefore prime for re-use for residential development.</p> <p>Requested / Recommended Changes to the Plan</p> <p>In light of, and as a consequence of these representations, the key parts / policies of the Deposit Plan subject to these representations, and which are considered to need amendment are:</p> <ul style="list-style-type: none"> • Policy SP7 Housing Requirement - increase in the overall housing numbers to ensure that the needs of the Authority are provided for, including an increase in the contingency provision and reduction in the provision for windfall sites. • Policy H1 Housing Sites - allocation of Alternative Site (Land at Chain Road) as a residential development site. • Policy SC 1 Settlement Limits - amendment of the settlement limits at Glynneath to include the proposed alternative site. <p>It is respectfully urged that the Plan is amended accordingly to ensure its 'soundness'.</p>
Dep1354	Mr M Evans		797794	Object	<p>Land adjacent to the rear of 10 Clyngwyn Road, Ystalyfera (Site 1)</p> <p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the proposed site being within the settlement limits of Ystalyfera within the Local Development Plan.</p> <p>The site is located at the north eastern end of Clyngwyn Road with links to all the facilities this area has to offer.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped. His site represents a possible windfall site but for it to be successfully considered it must be located within the Settlement Limits of Ystalyfera.</p> <p>Justification for Inclusion as an Alternative Site</p> <p>The Local Planning Authority has set out criteria whereby sites capable of development for residential purposes may be considered and have indicated that preference to such allocations will require the site to be contained within Settlement Limits and also should be on previously used land.</p> <p>Paragraph 9.3.14 states that there is not the expectation that all sites identified for housing development in the plan will deliver new housing in the future. There remains the possibility, however, that a number of the sites will be implemented and this category of development site therefore represents a</p>

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					<p>significant potential source for new housing. It is considered that this is one such site.</p> <p>Paragraph 9.5.2 (page 102) indicates that the majority of new housing will be delivered through the development of specific housing sites identified within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Whilst the site subject of this application was not submitted as a candidate site for inclusion within the Settlement Limits of Ystalyfera at the commencement of the LDP process, it nevertheless is a brownfield site. There is only one major housing site proposal allocated for Ystalyfera with the remainder of development being taken up with windfall sites within the settlement limits. The inclusion of this site within the Settlement Limits would help to satisfy this aim.</p> <p>The inclusion of the site within Settlement Limits will also result in the removal of a waste tip from a former clay pit which confirms its brown field status.</p> <p>Turning now to the provision of Affordable Housing within the Draft LDP, the Council has considered the contents of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 7.47 on page 89 at Fig. 80 shows the number of houses required in the period 2011 - 2026, namely Market Housing - 4900 and Affordable Housing - 3100.</p> <p>Paragraph 7.54 indicates there is a requirement for Affordable housing across all areas of Neath Port Talbot, and given the strategic requirement identified it will be important to maximise Affordable Housing delivery wherever possible. Nevertheless, the Council will need to consider the appropriate strategy for the future housing mix in each area based on individual area profiles provided.</p> <p>The Draft LDP lists targets for the provision of Affordable Housing and it is the Authority's aim to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas.</p> <p>The LPA has indicated its preferred Settlement Limits for Ystalyfera in the Draft LDP, and has excluded this site and as a consequence restricting the number of opportunities to :-</p> <ul style="list-style-type: none"> • Allow for controlled expansion of the village and • Allow for a percentage of Affordable Homes to be constructed to meet local demand. <p>The consequence of including this site within the settlement means that it would provide a percentage of Affordable Housing that would go some way to reducing the acknowledged shortfall of approximately 600 Affordable Home units identified by the Authority in Paragraphs 4.0.41 and 6.0.4 of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 6.0.5 of the same document states that the need for affordable housing remains a key issue for the Deposit Plan. This strategy is reinforced by paragraph 7.0.5 which seeks to provide additional affordable housing units throughout the County Borough and ensure new housing development makes a fair and justified contribution towards the provision of affordable housing.</p> <p>Although the Council has reduced the number of Affordable Homes required over the plan period from 3100 to 2500 (i.e. the 600 shortfall) it acknowledges that the Local Housing Market Assessment 2012 (see above) has identified the need for 3100 affordable units over the LDP period. Paragraph 9.0.6 states that the planning system will not be able to meet the entire need (of affordable housing) over the plan period.</p>

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					<p>Conclusion</p> <p>The proposed development if included within the Settlement Limits allows for the managed expansion of the settlement of Ystalyfera in a sustainable location with good access to areas within the Swansea valley and the more local facilities and services on offer in Ystalyfera.</p> <p>Development of the site would help support the facilities and services in Ystalyfera and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth Area' of Ystalyfera.</p> <p>The Local Planning Authority's considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims and would also provide for Affordable Housing that would go some way to reduce the identified shortfall of such units within the County Borough area over the plan period.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Ystalyfera.</p>
Dep1355	Mr M Evans		797794	Object	<p>Land adjacent to the rear of 10 Clyngwyn Road, Ystalyfera (Site 2)</p> <p>Introduction</p> <p>This application is made in order that consideration be given for the inclusion of the site proposed as being within the settlement limits of Ystalyfera within the Local Development Plan.</p> <p>The site is located at the north eastern end of Clyngwyn Road with links to all the facilities this area has to offer.</p> <p>The site now proposed as an Alternative Site was previously referenced as Swansea Valley SV5 - Garden of 10 Clyngwyn Road, Ystalyfera and was excluded from the Housing Sites allocation at Stage 3 of the Candidate Site Assessment Report (August 2013) - Page 101, for the following reason:-</p> <p>The spatial strategy focuses the majority of new housing, delivered through large site allocations, on the coastal corridor along with Pontardawe and Glynneath as growth points in the valleys. The remaining valley areas of the Amman, Afan, Swansea and Dulais will not have large site allocations and will support more limited growth in line with the Settlement Strategy. Part of the site contains an area of significant biodiversity value.</p> <p>Decision: The inclusion of such a large site in the valleys is not supported as it is out of accord with the spatial strategy.</p> <p>In order to ensure that land allocated in the LDP is capable of development and can contribute to the delivery of the Strategy, sites have undergone stringent assessments to determine their 'suitability' and 'deliverability' over the Plan period. In preparing the LDP, the Council has taken a significant number of sites into consideration, including those sites submitted as Candidate Sites and those Unitary Development Plan (UDP) allocations that currently remain undeveloped. His site represents a possible windfall site but for it to be successfully considered it must be located within the Settlement Limits of Ystalyfera.</p> <p>Justification for Inclusion as an Alternative Site</p> <p>The Local Planning Authority has set out criteria whereby sites capable of development for residential purposes may be considered and have indicated that preference to such allocations will require the site to be contained within Settlement Limits and also should be on previously used land.</p> <p>Paragraph 9.3.14 states that there is not the expectation that all sites identified for housing development in the plan will deliver new housing in the future. There remains the possibility, however, that a number of the sites will be implemented and this category of development site therefore represents a significant potential source for new housing. It is considered that this is one such site.</p> <p>Paragraph 9.5.2 (page 102) indicates that the majority of new housing will be delivered through the development of specific housing sites identified</p>

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					<p>within the plan whilst allowances for windfall sites together with the development of small sites and an allowance for empty homes being brought back into use will make up the remainder of the provision.</p> <p>This is further reinforced in Para. 13.0.5 (page 122) under the topic - Allowances. This states that windfall sites of 10 residential units or more which may compromise previously developed sites may become available over the plan period.</p> <p>However, the Draft LDP indicates that such windfall sites should be located within the Settlement Limits of the community. If the site is not contained within the Settlement Limits there would understandably be a presumption against development.</p> <p>Whilst the site subject of this application was originally dismissed as a Candidate Site (Site Ref SV5 refers) it nonetheless satisfies the criteria for the inclusion of such sites as defined by the Local planning Authority. The reason given for its exclusion has standard wording and is not site specific. It is considered that the Local Planning Authority had considered the inclusion of this site and it was only eliminated from the Candidate Site list at stage 3 following consultation with various consultees but no specific reasons have been given for its exclusion.</p> <p>It is noticeable from the LDP Candidate Site Assessment Report that the LPA has included similar smaller sites of roughly the same area within the Housing Allocation in other communities in the plan area.</p> <p>The Residential Candidate Sites filtered out at Stage 3 were excluded on the basis that they did not accord with the Preferred Strategy considered by the Local Planning Authority. It is contended however, that the site does satisfy the criteria set out the table on page 9 of the LDP Candidate Site Assessment Report (August 2013) under the Strategy topic.</p> <p>There is only one major housing site proposal allocated for Ystalyfera - H1/29, with the remainder of development being taken up with windfall sites within the settlement limits, which are not identified. The inclusion of this site within the Housing allocation would help to satisfy the provision of windfall sites as considered by the Local Planning Authority.</p> <p>The inclusion of the site will also result in the removal of a waste tip from a former clay pit workings which confirms its brownfield status.</p> <p>The Strategic Housing Site Assessment Report (August 2013) indicates the total housing provision for the area (excluding Pontardawe) as being 392 dwellings.</p> <p>Regarding proposed housing site H1/29 that is allocated for residential development within the plan period, it is understood that there is a current planning application submitted for consideration by the Local Planning Authority. This equates to approximately 120 houses.</p> <p>If planning permission is approved there will be no immediate 5 year supply of land available for development in the Ystalyfera area.</p> <p>Regarding the areas defined as Landbank sites, these are solely located within the development at Godrergraig (site refs H1/LB/35, 36 & 37 refer). Development here is on-going so there should be a requirement to provide additional sites to ensure sufficient land is available for development within the plan period particularly as the total provision for the area, i.e. 392 dwellings, is being eroded .</p> <p>The inclusion of the site subject of this application should go some way to secure the requirement for additional housing over the plan period and to provide an immediate supply of available land for development within the 5 year period</p> <p>Turning now to the provision of Affordable Housing within the Draft LDP, the Council has considered the contents of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 7.47 on page 89 at Fig. 80 shows the number of houses required in the period 2011 - 2026, namely Market Housing - 4900 and Affordable Housing - 3100 (Excluding Landbank sites).</p> <p>Paragraph 7.54 indicates there is a requirement for Affordable housing across all areas of Neath Port Talbot, and given the strategic requirement identified it will be important to maximise Affordable Housing delivery wherever possible. Nevertheless. the Council will need to consider the appropriate strategy for the future housing mix in each area based on individual area profiles provided.</p>

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					<p>The Draft LDP lists targets for the provision of Affordable Housing and it is the Authority's aim to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas.</p> <p>The LPA has indicated its preferred Settlement Limits for Ystalyfera in the Draft LDP, and has excluded this site and as a consequence restricting the number of opportunities to :-</p> <ul style="list-style-type: none"> • Allow for controlled expansion of the village and • Allow for a percentage of Affordable Homes to be constructed to meet local demand. <p>The consequence of including this site within the settlement means that it would provide a percentage of Affordable Housing or a contribution to such provision elsewhere within the plan area that would go some way to reducing the acknowledged shortfall of approximately 600 Affordable Home units identified by the Authority in Paragraphs 4.0.41 and 6.0.4 of the Swansea and Neath Port Talbot Local Housing Market Assessment 2013 paper published by Opinion Research Services.</p> <p>Paragraph 6.0.5 of the same document states that the need for affordable housing remains a key issue for the Deposit Plan. This strategy is reinforced by paragraph 7.0.5 which seeks to provide additional affordable housing units throughout the County Borough and ensure new housing development makes a fair and justified contribution towards the provision of affordable housing.</p> <p>Although the Council has reduced the number of Affordable Homes required over the plan period from 3100 to 2500 (i.e. the 600 shortfall) it acknowledges that the Local Housing Market Assessment 2012 (see above) has identified the need for 3100 affordable units over the LDP period. Paragraph 9.0.6 states that the planning system will not be able to meet the entire need (of affordable housing) over the plan period.</p> <p>Settlement Topic Paper (August 2013)</p> <p>9.0.3 With the exception of Dormitory settlements, all settlements have defined limits. Settlement limits are an important tool for managing the shape and extent of the urban area. They define the areas within which development which accords with the role and function of the settlement will be permitted in principle; they allow for development which would contribute towards the creation and maintenance of sustainable communities in accordance with the LDP strategy; they prevent the coalescence of settlements, ribbon development and fragmented development and also prevent inappropriate development in the countryside.</p> <p>9.0.4 Within settlement limits, most types of development will be acceptable in principle subject to compliance with all relevant policy, but in areas outside settlement limits development is much more strictly controlled and will normally only be permitted in the circumstances set out in the policy.</p> <p>In this instance part of Clyngwyn Road has been excluded from the Settlement Limit boundary in this part of Ystalyfera. However, historically, this part of Clyngwyn Road has been an established part of the settlement. The site has previously supported local industrial uses and more recently residential uses that once provided a sustainable source of economic activity and viability that supported the local population. The inclusion of this site will therefore reinforce the original settlement boundaries along Clyngwyn Road.</p> <p>Conclusion</p> <p>The proposed development if included as a housing site will allow for the managed expansion of the settlement of Ystalyfera in a sustainable location with good access to areas within the Swansea Valley and the more local facilities and services on offer in Ystalyfera.</p> <p>Development of the site would help support the facilities and services in Ystalyfera and development would also help sustain the population of the wider area, distribute growth accordingly and provide the population necessary to support the 'Strategic Growth Area' of Ystalyfera.</p> <p>The Local Planning Authority's considered aim is to develop communities that are strong and sustainable through meeting housing needs across all tenures. It also states that the LDP strategy is to reinvigorate Valley areas. The proposed development would contribute to these aims and would also provide for a percentage of Affordable Housing that would go some way to reduce the acknowledged identified shortfall of such units within the County</p>

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					<p>Borough area over the plan period.</p> <p>It is considered that the site now being submitted as an Alternative Site to be contained within the Settlement Limits satisfies the criteria for inclusion within the Settlement Limits of Ystalyfera.</p> <p>The only allocated site for Ystalyfera is H1/29 at the southern end of the town but development of this site may well commence within the next 5 years if planning permission is granted for the application currently under consideration.</p>
Dep1356	Mr Eric Lewis		324744	Object	<p>Land off Brynna Road, Cwmafan, Port Talbot</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 3.0 hectares, set immediately to the rear of established residential houses at Brynna Road, Cwmafan.</p> <p>We seek that the land be allocated as a Housing Site, under Policy H1, and an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cwmafan is attached to this form, with the site edged in red for identification.</p> <p>Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • The availability of previously developed sites and empty or underused buildings and their suitability for housing use; • The location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • The scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • The physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • The potential to reduce carbon emissions through co-location with other uses. <p>This Objection form is supplemented by a Planning Statement and Phase 1 Ecology Report, which address the site's compatibility with each of the above criteria. In short, the site at Cwmafan will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cwmafan, without any demonstrable harm to the mid-hillside landscape, by utilising mature and defensive natural boundaries to distinguish it from surrounding countryside; 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school, local shops and village facilities; 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified from a recent comprehensive Phase 1 Survey undertaken of the site's flora and fauna; 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses; and 5. Aid to foster the sense of Afan Valley identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Large Local Centre" status within the LDP. <p>The site should contribute to the allocation of housing under Policy H1 for the above reasons, being credible, robust and meeting the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some 60 units will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep1359	Messrs		457702	Object	Land at New Road, Cilfrew, Neath

ID	Full Name	Company / Organisation	Person ID	Object / Support	COMMENT
	DGH & IDJ Jones				<p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.54 hectares, set immediately adjoining and opposite established residential houses at New Road, Cilfrew.</p> <p>We seek that an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cilfrew is attached to this form, with the site edged in red for identification. Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological and historic sites and landscapes; • the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • the potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Cilfrew will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cilfrew, without any demonstrable harm to the mid-hillside landscape, by utilising mature and defensive natural and man-made boundaries to distinguish it from surrounding countryside. The site lies directly adjoining and directly opposite a continuous frontage of houses fronting New Road, and capable of direct access off that highway via an improved carriageway, with could accommodate traffic calming and provision of a public footway. The land at New Road would replicate a linear frontage of residential properties respecting the character and setting of the north-western side of that highway. The Objection site will therefore consolidate the built form of Cilfrew. 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school, secondary school and local shops at Cadoston. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified. 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses. 5. Aid to foster the sense of a Neath suburb identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Small Local Centre" status within the LDP. <p>The site should be considered as a minor addition, which will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some six additional units will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep1361	Mr Robert Maggs		196308	Object	<p>Tirbach Washery Site, Tirbach Road, Ystalyfera (Site 2)</p> <p>I consider the deposit plan to be unsound with respect to coherence and Effectiveness Tests - in particular test CE2.</p> <p>I consider the plan not flexible enough to sustain the needs of the local people of Ystalyfera. Currently people have to move out of the village when moving up to larger homes. The neighbouring village of Ystradgynlais has a much higher number of high quality family homes that are always in demand.</p> <p>The plan doesn't seem to recognise a need for aspirational housing and the fact that people may wish to stay where they are and not leave their immediate</p>

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					<p>families and friends.</p> <p>Section 2 'Strategy' point OB6 states as part : 'Reinvigorate the valley areas...' This reinvigoration seems to stop at Pontardawe which is identified as 'an area of strategic growth' so in effect there is no reinvigoration any further up the valley than Pontardawe. Anyone wishing to improve their (and their families) lifestyle or wishing to upgrade to a larger property is forced by the plan to move down the valley at least as far as Pontardawe or to move down to the coastal corridor where most of the focus of the plan seems to be.</p> <p>I therefore feel the plan does not reflect the reality of the situation in the upper Swansea valley. The plan in its current form will exacerbate the problem of people having to leave the upper Swansea valley area and positively discourages any person who may wish to move there. Therefore the plan fails in its stated objective of the re-invigoration of the upper Swansea valley.</p> <p>The new trunk road (A4067) from junction 45 of the M4 all of the way up the valley which the Ystalyfera bypass is part of, cost a huge amount of tax-payers money. What was all of this money spent for if not to support developments of this kind and encourage people to move up the valley and not away from it?</p> <p>Two of the big retail chains (Tesco and Asda) have recently opened new large supermarkets in Ystalyfera, these along with the existing village retail outlets provide ample retail facilities for any new development.</p> <p>A recent site meeting with NPT highways manager found that the site is easily integrated into the village of Ystalyfera by the installation of two new pedestrian access points and that the local road network has more than sufficient capacity. A review of the site access road onto the A4067 by a local engineering company showed that the A4067 can be easily adapted to the sites needs (see attached sketches).</p> <p>Candidate site SV7 - 2nd Submission proposing a 'phased' development.</p> <p>There are a lot of anti-social activities taking place affecting the northern perimeter and upper area of the site. A large amount of fly tipping takes place and the upper half of the site is used by a off-road motor bikes at the weekend which causes a lot of environmental damage and presents a hazard to members of the community using a public right of way which crosses the site. An extension of the current residential boundary (which stops at the site gate) and a future development would help halt these anti social activities by bringing the area into use.</p> <p>The site is brownfield - an old coal washery - and is in a derelict state. The only chance to reclaim this site will be by a development of this kind otherwise the site will continue to be a potential source of pollution - fly tipping etc and remain an eyesore.</p> <p>Finally the site has a long elevated river frontage which is very rare for a new housing development in the UK, so when taking into account the demand for the higher quality houses in the neighbouring village of Ystradgynlais, a high demand for a development of aspirational homes incorporation riverside apartments is anticipated, this would also change the entire dynamic of Ystalyfera and truly re-invigorate the upper Swansea valley area an objective which the LDP aims for but fails to do.</p> <p>Note- This is a second submission for this site, The difference between this and the first is this submission for an additional/new site to be added to the plan 'phases' the development i.e. move the residential boundary to initially only encompass the lower site area - then pursue by the council monitoring process for any further extension of the development.</p> <p>Whilst this is a valid approach it would not address the anti-social activities that take place across the Northern edge of the site, also any future development of the higher area would require the use of large earth moving machines and may be overly intrusive to existing dwellings already on the lower site area. Other than this phasing the submissions are almost identical.</p> <p>A phased approach will bring additional challenges - Future earthworks required on upper area, Possibly not solving the anti-social activities along the Northern perimeter of the site as this area would still not be 'used', Future integration of additional roads etc, etc, Whilst all of the challenges can be overcome the preferred option is to move the boundary around the whole site in one go as reflected in the 1st submission.</p>

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Dep1363	Mr V Price		196316	Object	<p>Land South of Bay View, Port Talbot</p> <p>Essentially we submit that the settlement boundary for Port Talbot should be extended to include land south of Bay View and north of the Ynys y Gored housing development.</p> <p>The land in question is presently shown outside of the settlement in the Deposit LDP. It is submitted that a small development here would contribute to the housing supply and would be viewed in the context of the surrounding settlement to both the north and south.</p>
Dep1371	Mr V Price		196316	Object	<p>Land at Broomhill, Port Talbot</p> <p>Essentially we submit that the settlement boundary for Port Talbot should be extended to include land at Broomhill.</p> <p>The land in question is presently shown as open countryside in the Deposit LDP. It is submitted that a small development of three dwellings here would contribute to the housing supply and would be viewed in the context of the surrounding settlement to both the north and south.</p>
Dep1375	Mr Robert Maggs		196308	Object	<p>Tirbach Washery Site, Tirbach Road, Ystalyfera (Site 1)</p> <p>I consider the deposit plan to be unsound with respect to coherence and Effectiveness Tests - in particular test CE2.</p> <p>I consider the plan not flexible enough to sustain the needs of the local people of Ystalyfera. Currently people have to move out of the village when moving up to larger homes. The neighbouring village of Ystradgynlais has a much higher number of high quality family homes that are always in demand.</p> <p>The plan doesn't seem to recognise a need for aspirational housing and the fact that people may wish to stay where they are and not leave their immediate families and friends.</p> <p>Section 2 'Strategy' point OB6 states as part : 'Reinvigorate the valley areas...' This reinvigoration seems to stop at Pontardawe which is identified as 'an area of strategic growth' so in effect there is no reinvigoration any further up the valley than Pontardawe. Anyone wishing to improve their (and their families) lifestyle or wishing to upgrade to a larger property is forced by the plan to move down the valley at least as far as Pontardawe or to move down to the coastal corridor where most of the focus of the plan seems to be.</p> <p>I therefore feel the plan does not reflect the reality of the situation in the upper Swansea valley.</p> <p>The plan in its current form will exacerbate the problem of people having to leave the upper Swansea valley area and positively discourages any person who may wish to move there. Therefore the plan fails in its stated objective of the re-invigoration of the upper Swansea valley.</p> <p>The new trunk road (A4067) from junction 45 of the M4 all of the way up the valley which the Ystalyfera bypass is part of, cost a huge amount of tax-payers money. What was all of this money spent for if not to support developments of this kind and encourage people to move up the valley and not away from it?</p> <p>Two of the big retail chains (Tesco and Asda) have recently opened new large supermarkets in Ystalyfera, these along with the existing village retail outlets provide ample retail facilities for any new development.</p> <p>A recent site meeting with NPT highways manager found that the site is easily integrated into the village of Ystalyfera by the installation of two new pedestrian access points and that the local road network has more than sufficient capacity. A review of the site access road onto the A4067 by a local engineering company showed that the A4067 can be easily adapted to the sites needs.</p> <p>There are a lot of anti-social activities taking place affecting the northern perimeter and upper area of the site. A large amount of fly tipping takes place and the upper half of the site is used by a off-road motor bikes at the weekend which causes a lot of environmental damage and presents a hazard to members of the community using a public right of way which crosses the site. An extension of the current residential boundary (which stops at the site</p>

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					<p>gate) and a future development would help halt these anti social activities by bringing the area into use.</p> <p>The site is brownfield - an old coal washery - and is in a derelict state. The only chance to reclaim this site will be by a development of this kind otherwise the site will continue to be a potential source of pollution - fly tipping etc and remain an eyesore.</p> <p>Another option is to 'phase' the process - move the residential boundary to initially only encompass the lower site area - then pursue by the council monitoring process for any further extension of the development. Whilst this is a valid approach it would not address the anti-social activities that take place across the Northern edge of the site, also any future development of the higher area would require the use of large earth moving machines and may be overly intrusive to existing dwellings already on the lower site area. A development of a site of this size would anyway be inevitably phased as part of the building / marketing process.</p> <p>Finally the site has a long elevated river frontage which is very rare for a new housing development in the UK, so when taking into account the demand for the higher quality houses in the neighbouring village of Ystradgynlais, a high demand for a development of aspirational homes incorporation riverside apartments is anticipated, this would also change the entire dynamic of Ystalyfera and truly re-invigorate the upper Swansea valley area an objective which the LDP aims for but fails to do.</p>
Dep1376	Messrs Eric Patterson & Vic Price		786506	Object	<p>Land along B4282 West of Bryn and land at Penhyddwaelod, Bryn</p> <p>The proposals at Penhyddwaelod, including land west of Bryn, are for a large extension to the settlement, mostly to provide housing but also a range of other facilities and uses would be logical and beneficial to Bryn. As shown in Appendix 1 to our submission, there is interest from a local developer who is very interested in the site. In summary, our representations show that this site would be a more sustainable and beneficial allocation than either Western Logs or Hawthorn Close at Cwmafan. We also advocate the deletion of the housing allocation at Blaenbaglan School on the grounds of flood risk.</p> <p>Although we have not assessed the housing numbers that the LPA have calculated to represent the requirement for the LDP period, if the Inspector finds a shortfall (as is possible given the deviation from the Welsh Government projections), we invite consideration of the land at Bryn as a potentially high-quality, innovative and sustainable development that can help meet any identified shortfall.</p> <p>Nonetheless, we submit that in order for the LDP to be found sound, sites that best meet the correct strategy, that are implementable and that represent the most credible and alternative allocations having regard to the evidence base in its entirety, should be included - and that upon examining the evidence, the conclusion is that land at Bryn should be allocated for housing and potentially ancillary uses.</p>
Dep1377	Messrs DGH & IDJ Jones		457702	Object	<p>Land at Main Road, Cilfrew, Neath</p> <p>The Objection to the Plan is made on the basis of the non-allocation of a site of 0.55 hectares, set immediately to the rear of established residential houses at Main Road, Cilfrew.</p> <p>We seek that an amendment to the settlement limits be made under Policy SC1. An extract from the Ordnance Survey Plan for Cilfrew is attached to this form, with the site edged in red for identification. Planning Policy Wales (5th Edition - Nov.2012) sets out, within paragraph 9.2.9, the criteria for Local Planning Authorities in selecting sites to be allocated within LDPs. The selection criteria are as follows:</p> <ul style="list-style-type: none"> • the availability of previously developed sites and empty or underused buildings and their suitability for housing use; • the location of potential development sites and their accessibility to jobs, shops and services by modes other than the car, and the potential for improving such accessibility; • the capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools and hospitals), to absorb further development, and the cost of adding further infrastructure; • the scope to build sustainable communities to support new physical and social infrastructure, including consideration of the effect on the Welsh language, and to provide sufficient demand to sustain appropriate local services and facilities; • the physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk, taking into account the possible increase of such risk as a result of climate change, and the location of fragile habitats and species, archaeological

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					<ul style="list-style-type: none"> and historic sites and landscapes; • the compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development; • the potential to reduce carbon emissions through co-location with other uses. <p>This Objection sets out to illustrate the site's compatibility with each of the above criteria. In short, the site at Cilfrew will:</p> <ol style="list-style-type: none"> 1. Form a logical extension to the built settlement form of Cilfrew, without any demonstrable harm to the mid-hillside landscape, by utilising mature and defensive natural and man-made boundaries to distinguish it from surrounding countryside. The site lies directly adjoining the rear perimeters of houses fronting the eastern flank of Main Road, and capable of direct access off that highway via an improved access with the former Cilfrew Hotel. Alternatively, the Objectors own property at Main Road which could be demolished to make way for a new access road to facilitate development. The land falls to New Road to the east, which itself is noted for a linear frontage of residential properties. The Objection site will therefore occupy a modest area of land between the above highways, and as such consolidate the built form of Cilfrew. 2. Be fully accessible to public transport, being within easy walking distance of a major bus route. It is also within walking distance of the village primary school, secondary school and local shops at Cadoxton. 3. Not affect any acknowledged areas of designated nature conservation or historic interests. No risks to biodiversity have been identified. 4. The site is not at risk from flooding, contamination or from any adjacent non-residential land uses. 5. Aid to foster the sense of a Neath suburb identity, by preserving and encouraging the Welsh language, and assisting to maintain the facilities of the "Small Local Centre" status within the LDP. <p>The site should be considered in the context of Planning Permission under P2004/0370 in February 2005, which was granted on appeal to the Assembly Ministers. The site, nor its immediate surroundings, has not undergone any material physical changes since that decision. It was agreed at that time that the site formed a logical rounding off between Main Road and New Road.</p> <p>The minor addition will be credible, robust and meet the Plan's aims to foster sustainable communities. We consider that the allocation of the site for some six additional units will not undermine the strategy of the Plan, nor present any significant departure from the Jobs-lead Growth Strategy advocated within the Deposit Plan.</p>
Dep1379	Mr T. Williams		787380	Object	<p>Land off B4283 Cefn Cethin, Bryn</p> <p>Only require a mere extension to settlement limit, enough for one dwelling on boundary of settlement, adjacent to existing land where planning permission granted.</p> <p>I believe that the LDP is unsound. Having read the LDP, Candidate Site Assessment Report, Population and Housing Topic Paper, Settlement Topic paper, Economy and Employment Topic Paper there is not enough land in the Valleys.</p> <ul style="list-style-type: none"> • 65 units in Table 5.3 over 15 years is not reinvigoration as it says in the "vision." • 60 windfall sites are no guarantee of any being developed yet I wish to build. • My site is a gateway to the village and as such will be a high quality, well maintained statement property to reflect a new era of reinvigoration • Too many plots are available for large developers and therefore the plan is not flexible. • The Peoples Places Futures, Vibrant Economy, Economic Renewal: A New Direction, Vibrant and Viable Places, Swansea Bay City Region, Economic Growth Strategy, SIP Outcome 3, Western Valleys Strategy, Local Housing Strategy and the Vision all directly state "Valley communities will be supported and revitalised through encouragement of new and expanded economic activity" - how / where? • No industry, no employment that leaves only housing. • Live work only delivers 5 in the monitoring - it has to come from housing. • My site is adjoining, will help a local business continue to farm/ look after animals and maintain the land for future generations. Theft and vandalism and cruelty to stock has almost ended the business. This site will allow not only housing but an agricultural business to thrive. • The Plan is not optimistic, does not plan for vibrancy - as written it merely watches the Valleys die. • The settlement limit policy/ live work allow for extensions from the settlement limit as drawn, I am only asking for the same. <p>Amendment would allow us to build a house allowing us to better deal with issues such as theft etc. Being closer to the farm would assist us in</p>

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					improving the site's quality and surrounding area. As the site already borders the current scope of the LDP, we see little negative impact to extending it a small amount to allow this, especially considering there is planning permission granted mere metres away.
Dep1380	Mr Robert Axworthy		213503	Object	<p>Land adjacent to 2 Underbridge, Pontrhydyfen</p> <p>To include site PT104 in the Local Development Plan.</p> <p>This is not in Port Talbot but in Afan Valley and should be included in the plan as this one plot has no impact in the overall plan and there is no new allocation for Afan Valley.</p>
Dep1381	Mr Edward James		449822	Object	<p>Land at Lon-y-Bryn, Glynneath</p> <p>Delete "adjacent to" and "immediately adjacent to", replace with "in close proximity" in subsection 1 and 2</p> <p>Representation on Policy SC1 and EC6</p> <p>Both policies state that they will help reinvigoration. Because they are limited to only sites on the settlement limit and they do not want 'bad neighbours' hardly any will be built (5 - 10 predicted).</p> <p>By changing the wording more sites would benefit including my site NV73 Land at Lon-y-Bryn, Glynneath.</p> <p>In the present form SC1 and EC6 are not logical and the development will not logically come from it. It is too inflexible.</p>

