

## Neath Port Talbot Local Development Plan

### Session 7: Matter 4: Housing Provision – Allocated sites (3)

19 March 2015

#### Notes

#### Present

Ceri Morris (CM) (Planning policy manager)	NPT Council
Lana Beynon (LB) (LDP team leader)	NPT Council
Anne-Marie Hurley (AH) (Planning officer)	NPT Council
Simon Walford (SWa) (Planning officer)	NPT Council
Terry Davies (TD) (Highways officer)	NPT Council
Ryan Norman (RN)	Dwr Cymru Welsh Water
Geraint John (GJ)	GJ Planning (for various)
Graham Carlisle (GC)	CDN Planning
Vic Price (VP)	Site owner
Evan John Roberts (ER)	Local resident
John Morgan (JM)	Local resident
Valerie Morgan (VM)	Local resident
John Hussell (JoH)	Local resident
Janet Hussell (JaH)	Local resident

**Key Issues: Have relevant alternatives been considered, is the identification of the housing sites based on a robust and rational site selection process? Are the policies and requirements for the housing allocations clear, reasonable and sufficient?**

#### Questions for each site:

- **Is it clear why the site has been selected over other candidate and alternative sites?**
- **Are the numbers of units identified realistic and achievable?**
- **What are the various constraints affecting the site? In the light of constraints, and other matters, where is it set out what the requirements are for the site? Is there sufficient clarity and certainty?**
- **Having regard to constraints, where they exist, as well as the need to provide for affordable housing and infrastructure, is the site viable?**
- **Are the delivery mechanisms for each site clearly identified? Is the timing and/or phasing of each site clearly set out?**

#### Brief summaries of cases

- **How is the LDP unsound?**
- **What changes are necessary to make it sound?**

#### Welcome and Introduction

SW makes introductions. Everyone introduces themselves.

#### 1. H1/LB/13 (Blaenbaglan Farm, Baglan)

#### 2. H1/12 (Blaenbaglan School (land to rear of) Baglan)

SW: Can the Council explain the background and up-to-date position in regards to Blaenbaglan Farm?

CM: This site appears as a landbank site, based on an extant permission which dates back to the 70s. A Certificate of Lawful development has been issued. The site was not included in the UDP as it was not needed. However the site is not considered to be required. It is proximate to the Blaenbaglan School site and we anticipate that they will come forward together.

SW: In that case we will consider these two sites together.

SWa: The permission is for 219 units. We expect the two sites together to deliver 260 units, but not all within the plan period. On the farm site, we expect the first 30 completions in 2020/21. On the school site, having spoken to the Council's property team, it might come forward earlier than anticipated as it is being marketed in the next couple of years.

SW: The Phasing and Delivery paper says that the school site would not deliver units until 2021. Has that changed?

SWa: The property team is optimistic that it could deliver units soon.

SW: We have asked you for a new trajectory, so that can be included in that. I should make the point that as the farm site has permission there is little that we can do about it. I understand that the Wales Coastal Path runs through the site.

AH: The Coastal Path cuts across the access road to the farm site. It may be feasible to divert the path accordingly but that would be subject to a separate regulatory process.

SW: It does not sound insurmountable, is that what you're saying?

AH: Yes.

GC: Can I clarify that the path goes through the site?

AH: It cuts across the access road only.

GC: We see constraints present for both sites. There are certain matters which Welsh Water may want to comment on. The access road for both sites is already highly subscribed and I am surprised that the Council's Highways department is not concerned. Baglan is marching up the hillside and these developments will take it to the summit, with significant problems to do with servicing and so forth. Although there is a planning consent, there is a question as to whether they are deliverable within the plan period. The scheme was approved 20 years ago during a boom period but has not come forward. We doubt it will do. In terms of soundness it is questionable.

SW: Apart from the need to find sites for new housing, does the Council have evidence that the sites will come forward within the next 10 years?

CM: Yes, we believe there is sufficient evidence already. In terms of access, Mr Davies from our Highways department may be able to elaborate. However there is potential for more than one access. The topography is notable but it would not take it to the ridgeline.

SWa: The access to the farm site can be gained from land the Council owns. We expect the school site to come forward sooner rather than later and this will open up the farm site for development. There is greater certainty for this reason.

TD: The Council has undertaken a transport assessment. This shows work would be required were all of the land to be developed for housing but this can be undertaken.

SW: Would the necessary works amount of abnormal costs which would impact on viability?

TD: We have not assessed the costs in detail but they would not be abnormal.

GC: There is a question about viability. Could the Council provide more information about the required works?

TD: Junction works are required to Pentwyn road and to the Sandycroft roundabout. For the latter the Welsh Government would be responsible and they have not raised an objection.

GC: I note that there are currently problems with water supply to the Blaenbaglan School site.

RN: In terms of the school site, we are not obliged to provide water supply due to its location and height. In order to supply that site we would require modelling to be undertaken. It would potentially require an additional pumping station due to the height of the site and water pressure issues. It is not insurmountable within the time frame, however.

GC: It sounds as though the costs are mounting for this site to come forward.

SW: Document EB06, at 4.1.2.12, notes that flooding is possible in the Lower Baglan area. It refers to an assessment that is being undertaken.

AH: The assessment of flooding in the Lower Baglan area is nearing completion.

NG: I appreciate that the landbank site was not allocated, but was it within the settlement boundary in the UDP?

CM: No.

SW: Mr Carlisle, what changes would you seek to make the plan sound?

GC: Significant infrastructure improvements are required for these sites. There is no confidence that the housing numbers will come forward as the Council hopes. We therefore feel that other sites should be considered instead.

### **3. H1/13 (Hawthorn Close , Cwmafan)**

### **4. H1/14 (Western Logs, Cwmafan)**

SW: Some of the issues on these next two sites are similar so we will consider these in one discussion. Can the Council update us on the current position?

CM: For Hawthorn Close (Site 13), as identified in document ED022, discussions are ongoing with the landowner. There have been no discussions on the Western Logs site (14), which is in use as a sawmill. Site 14 is therefore phased slightly later. But we feel both are deliverable and viable and have good links to Cwmafan.

SWa: The Cwmafan area has proved a popular location for new housing in recent years; Barratts and Persimmon have been active in the area. We anticipate Site 13 coming forward quite quickly.

SW: Mr Carlisle, I think you are particularly concerned about Site 14.

GC: We would raise questions about the sustainability of developing both sites. There are not good linkages between these sites and Cwmafan as a whole; we disagree with the Council on that point. The constraints regarding Site 13 are more limited but with Site 14 they are numerous. It is surprising that the Council has not considered the quality of the land and the improvements or remediation that would be needed to prepare the site for housing. A desktop study, at the very least, should have been undertaken. Costs for this are unknown.

SW: You say that it is adjacent to a landfill site and you are concerned about contamination. Is that from previous activities?

GC: Yes, mainly from the logging.

SW: Has the Council considered contamination?

AH: Yes, we have consulted with our contaminated land section for all sites. No insurmountable obstacles were identified. It is part and parcel of a brownfield strategy.

GC: It is strange that the Council is happy to allocate sites and to leave any investigation of previous uses to the planning application stage. Consequently there are significant question marks about viability and the Council does not have the answers.

CM: We can only go so far at the LDP stage. We feel that sufficient information has been identified; any constraints are spelled out in the plan.

GC: In Swansea, I have been asked by the Council to provide significant information about sites previously in mining use. NPT Council has not done this.

SW: I hear what the Council is saying, but if significant issues do crop up at planning application stage in terms of contamination and land stability, then the permission will not be given.

GC: I agree. Either the issues are brought to light and the permission is not granted, or the would-be developers of the site would not put in an application because it is simply unviable.

CM: The Council's site assessment is comprehensive and detailed. Within the overall land supply we have gone for a 10% flexibility allowance which would cover the issues that Mr Carlisle is referring to. Such issues are therefore built into the overall allocation strategy.

LB: The AH viability study is a high-level assessment; an approach that is undertaken in both Wales and England. It takes into account normal development costs and contingencies. In terms of land negotiations, any constraints needs to be taken into account at that stage.

AH: We have looked at how linkages to Cwmafan could be improved. The strategic housing site assessment identifies a potential cycle linkage from Hawthorn Close to the centre of Cwmafan which would greatly improve access.

SW: In terms of traffic works, these are set out in 4.2.3.5 of the site assessment document. These refer to the need to realign the B4282, enabling pedestrians to cross the A road. Those improvements sound fundamental. But they also sound expensive?

TD: No cost analysis has been done on the realignment of the junction. It would not be cheap as it is traffic signal controlled. Just to be clear: Hawthorn Close would not require a realignment. Only the sawmill site would.

GC: The costs continue to mount in terms of the development of these sites. Why are they being allocated? We feel that access into both sites could be problematic. The sustainability of both sites are in question. I understand that a high-level viability assessment has been undertaken but it is important that the Council is satisfied that all sites are deliverable within the plan period.

LB: Our view is that the identified constraints will not harm the viability of these sites.

SW: Mr Carlisle, would you like to sum up?

GC: Do you look at all the sites?

SW: Yes, all allocated sites.

GC: Then I am satisfied that you will see the issues which I have raised.

SW: OK, let's move on to Site 15.

## **5. H1/LB/15 (Stycyllwen)**

SW: The position in this case is that the site is allocated, but it is a landbank site with permission and is largely complete. But there are alternative sites around the edge of the site. Normally we would

discuss these separately but the site promoter is not present and therefore the debate may be a little one sided. Could the Council update us on the allocated site?

CM: The site is largely complete. We received a representation from Ryehill Properties which generated two entries on the register of alternative sites. The developer's first option was a new site. The second option was to amend the boundary of the current landbank site. Hence why there are three issues at play.

JoH: Our concerns relate to the land behind Sarnfarn. The access would be to the rear of our property, very close by. It cannot be sound to include the alternative site as the access road would create new traffic at a hazardous junction. It will cause a danger to the owners and occupiers of the adjacent premises. It will inhibit the enjoyment of the environment. It is not clear whether AS(A)11 requires the same access road but if so then our objections extend to that site as well. Access cannot be gained by the Rowan Tree Avenue part of the development or from the M4 slip road. Hence our concerns.

JM: I endorse all of those points. We live behind Stycyllwen Farm at the other end of the access road. If this goes ahead, it must be that the second access would be via Rowan Tree Avenue. Seven bungalows on that road are occupied by older people. The road that we live on is not yet fully adopted, as far as we are aware. The adoption is being held up by Barratt Homes. We are worried about how the older people will manage. There is a children's playground there too. The volume of traffic would be greatly increased and this would endanger human health. It is a dangerous road.

JaH: With the closure of Junction 41 of the M4, the road is already very busy and will only get worse.

CM: The Council is currently in receipt of a planning application, which is what the residents are commenting on. There are unresolved issues; hence the extended site has not been allocated. However, we have included it within the settlement boundary so that, if the issues could be resolved, it could constitute a windfall.

SW: So the planning application is for AS(N)37?

CM: Yes.

SW: Mr Hussell, was there anything else?

JoH: Only that we have lodged the same objections to the planning application.

SW: How many homes is the application for?

AH: 78 units.

JoM: In terms of flooding, if the application is allowed, it will exacerbate the problem as drainage is already an issue.

SW: That will be considered as part of the planning application. Thank you everyone for your contributions, it has been very helpful. We have also read your representations. We have one site left, so let's tackle that now.

## **6. H1/23 (Park Avenue, Glynneath)**

SW: This site is allocated for a mix of uses, including around 150 homes. What other uses might be on the site?

CM: Under VRS1, this site is a Valleys regeneration site. Glynneath is an important location as part of the development of the upper valley. We expect around 150 dwellings and a small element of retail.

SW: Can you indicate how much retail?

LB: A retail capacity assessment was undertaken. Potential for around 660 square metres of new retail was identified for Glynneath, mainly for convenience goods but including a small element of comparison floorspace. It benefits from links to the town centre and hence would support linked trips.

CM: An SPG is expected which will orientate the retail towards the town centre.

SW: Is all of that (points to map) considered to be the centre of Glynneath?

CM: It is probably best to refer to the Proposals Map, Inset Map 7.

SW: I see. Would it be fair to say that the retail unit would need to be within a certain number of metres of the town centre? It could not be within the bottom corner, for example.

CM: Yes. That would be part of the masterplanning exercise.

SW: So, 660 square metres. That sounds like a modest sized convenience store.

LB: Correct.

SW: It is adjacent to a Conservation Area. What concessions would need to be made to conserve or enhance the CA?

CM: That will have a bearing in terms of design and appearance. In addition there is an element of flooding on the site which would need to be addressed in terms of the developable site area.

SW: Mr. Roberts, you have already raised flood risk in your representation. So as you hear, that may be addressed. But you also have concerns about the impact on your house?

ER: It is near to my house. I want to know how close to my house they could build. Tesco have previously been interested and wanted to come right up to the site boundary.

SW: (Looks at maps with representor and the Council.) It is directly adjacent and overlooking may be an issue.

ER: My roof is basically at the bottom of the site. There are flooding issues; any drainage issues affect my property. My concern is where the water will go if they build houses and roads on this site.

SW: Can the Council address that point?

CM: An assessment would need to be made. That would be part and parcel of the normal planning application process. In terms of overlooking, Policy BE1 – the Design policy – stipulates what would be required. In any new development, siting, appearance, scale, massing and height would all be considered. In addition, the impact on existing residents would be assessed.

SW: Would letters be sent to neighbours if a planning application was submitted?

CM: Yes, that would happen.

ER: We are right on the boundary. It is a very dangerous corner already and I am concerned about the impact of further development on that.

CM: All I can say at this stage is that there are more than one potential access sites and more than one access point is likely to be looked at in order to alleviate any traffic issues.

RN: Just to explain the sewerage system. It is a combined sewer for foul and surface water. If they site was developed we would seek the developer to contain surface water separately through SUDS.

SW: Mr. Roberts, do you have any other concerns?

ER: Flooding from drains is the main worry. Welsh Water have said that they would sort it out previously but that has not happened yet.

SW: OK, that brings us to the end. The only action points are to update the housing trajectory with the Blaenbaglan School site, and providing Mr. Roberts with a photocopy of the relevant planning policies. Mr. Morris, you asked about anticipated timescales for the action points?

CM: We could potentially provide them by the end of next week.

SW: That would be great. Thanks to everyone for coming along.

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