



Geraint John Planning

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By Email: programmeofficer@npt.gov.uk

LDP Programme Officer
Neath Port Talbot County Borough Council
Room 220
Civic Centre
Port Talbot
SA13 1PJ

Dear Sir / Madam,

**Neath Port Talbot County Borough Council Local Development Plan Examination
Response to Matters and Issues: Matter 11: Alternative Sites
Land at Chain Road, Glynneath AS(N) 24**

Please find enclosed, on behalf of and under instruction from Cuddy Demolition & Dismantling Ltd, representations (supplementing previous evidence submitted), to the Local Development Plan Examination Hearing Sessions.

This submission relates to matters and issues raised by, and set out in, the ED011 Inspectors' List of Matters and Issues (Jan-15) to cover Hearing Matter 11: Alternative Sites.

We look forward to attending the Hearing Session(s) in due course. In the meantime we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely

Geraint John
Director
Geraint John Planning Ltd.

ANNEX

Introduction

This Annex relates to the matters and issues raised by, and set out in, the ED011 Inspectors' List of Matters and Issues (Jan-15) to cover Hearing Matter 11: Alternative Sites, Hearing Session 17 in relation to Land at Chain Road, Glynneath AS(N) 24.

Each of the relevant issues raised in relation to the above matter are considered in detail below.

These representations should be supplemented by earlier submissions made to the LDP on behalf of Cuddy Demolition & Dismantling Ltd. Accordingly, this representation only provides responses to the matters raised where it is considered necessary and relevant to do so.

Prior to dealing with the Matters and Issues raised, it is considered appropriate to outline and summarise the position in respect of the previous representations / case made, and also the planning status of the site.

Previous Representations Made

The key and principal representations previously submitted by Cuddy Demolition & Dismantling Ltd, are, in summary, as follows:

- The Land at Chain Road, Glynneath AS(N) 24 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.
- Representations made have considered that Policy H1 Housing Sites requires amendment such that Land at Chain Road, Glynneath AS(N) 24 is allocated as a residential development site;
- The amount of housing provision within the Plan is generally supported, however it is considered that the Plan ought to increase its provision in order to be more positive and aspirational (as other Authorities are doing) – in line with the Welsh Government's drive to re-stimulate the housing market. An additional level of housing land supply should, in addition to those contingencies factored in to the Plan, therefore be made to make allowances for a buoyant housing market, and provide greater flexibility and deliverability over the Plan period; and
- The distribution of housing within the Plan is over-reliant on Coed Darcy – which has known and identified constraints, complexities, and timing / delivery issues. Accordingly, the allocation of further sites of differing character and location is required to de-risk the deliverability of the Plan's housing land supply.

Planning Status of the Site

A planning application was submitted to the Authority in January 2014 under reference P2014/0083. This application has yet to be decided whilst further technical work is finalised in relation to flood risk. This work is currently being undertaken in conjunction with, and based on comments from Natural

Resources Wales (NRW). It is envisaged that the finalised modelling will confirm to NRW's satisfaction that with the proposed development configuration and indicative conceptual compensation storage scheme in place, the potential consequences of fluvial flooding on the site will be shown to be acceptable and manageable, in line with TAN15 criteria and NRW guidance.

Notwithstanding this residual technical manner, it should be re-iterated that there are a number of material considerations in support of the application, which include the following:

- The site is located within the boundary of settlement limits within the current adopted Development Plan – confirming the inherent suitability and acceptability of the proposed residential development of the site;
- The site's sustainable location – within close proximity of a variety of local services and amenities, and accessible by a variety of transport modes, including walking, cycling and public transport;
- The site's location – which is bound by physical development on all sides, and is considered to be complimentary in type and scale with the surrounding pattern of development;
- The site presents an opportunity for an inherently deliverable housing scheme which can make a significant contribution to Housing Land Supply in the short term;
- The site's vacant / un-used, previously developed / brownfield status – the redevelopment of which is supported in advance of greenfield sites, at both the national and local levels;
- The contribution of the development in improving the setting and appearance of the site – which is currently vacant and in an unkempt condition despite its prominent position in Glynneath;
- The impact of the development on the surrounding highway network is insignificant – as demonstrated in the Transport Assessment which supplements the application;
- There are no overriding ecological constraints to the development of the site – as confirmed in the ecology surveys undertaken and set out in the Ecology Report – which supplements the application;
- The development of the site will appropriately address issues with regards to ground contamination as demonstrated by the Ground Conditions Desk Study Report submitted in support of the application;
- The redevelopment of this vacant brownfield site for housing (including a proportion of affordable housing) will have a wider positive regenerative effect on the settlement of Glynneath and will contribute to the wider regeneration of the Upper Neath Valley.

The wider benefits of allocating the site are outlined below in response to the relevant matters and issues raised below.

Response to Matters and Issues

Key Issue: Whether the identification of the alternative site in question is essential to the soundness of the LDP.

This representation is structured as follows in response to the key issue raised by, and set out in, the ED011 Inspectors' List of Matters and Issues (Jan-15):

- consideration of housing supply and distribution by the plan (at the overall / plan-wide area); and
- assessment of the suitability of the proposed alternative site;

Consideration of Housing Supply and Distribution by the Plan

Whilst it is not the intention to replicate the representations previously made to Examination Matter 3: Housing Provision – Distribution and Amount, it is considered appropriate to respond to the various action points raised during this hearing session – as these will have an indirect bearing on the identification of alternative sites and their contribution to the soundness of the LDP.

As such, it is considered that the following pertinent issues were advanced within the representations to this examination matter:

- There is a need for an additional supply of housing – owing to NPT’s inappropriate under-calculation of the vacancy rate¹, and in order to be consistent with and reflective of the aspirational/economic development led strategy of the plan – with the Welsh Government considering ‘that the LDP could plan more positively through an increase of around 400 dwellings’²;
- Consideration of increased deliverable sites is required to ensure flexibility / contingency - with the Welsh Government stating that ‘the potential short term delivery problems could be further compounded by the delayed flexibility in the event that sites fail to come forward or deliver the anticipated number of units’³. This is particularly pertinent given that the over-reliance on Coed Darcy Urban Village – which is required to deliver 28% of the total housing requirement for the Council to meet its projected five year housing land supply as noted in our previous representations to Matter 3: and
- The anticipated delivery of windfall sites, as noted in ED010 Phasing and Delivery Paper (January 2015)⁴ highlights that there is potential for the under-delivery of anticipated small and windfall sites which comprise part of the Plan’s housing supply, when compared to delivery information on actual completions³.

The representations advanced with regard to housing supply and distribution are clear and consistent that 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 that the Plan’s aim of re-stimulating the housing market are met. Furthermore, these sites should be inherently deliverable in the short-term.

In light of the above, and having regard to the material considerations in support of the current planning application, it is considered that the Land at Chain Road, Glynneath AS(N) 24 should be allocated for residential development, and located within settlement limits. An assessment of the suitability of the proposed alternative site for allocation is outlined below.

Assessment of the Suitability of the Proposed Alternative Site

The suitability of the site for allocation has been set out in our previous representations to the Plan⁵. As such, we will not replicate these representations here. However, it is considered pertinent that the suitability of the site in the context of the wider aims of the Plan, and the site-specific issues of flood risk are outlined here.

¹ Welsh Government Examination Hearing Statement: Matter 3 Housing Provision, Feb 2015: Page 6

² Welsh Government Examination Hearing Statement: Matter 2 Housing Provision, Feb 2015: Page 2

³ Welsh Government Examination Hearing Statement: Matter 3 Housing Provision, Feb 2015: Page 9

⁴ Neath Port Talbot, ED010 Phasing and Delivery Paper (January 2015): Page 13

⁵ Comments / Objections to the Plan: Deposit LDP Reps, Geraint John Planning, 15th October 2012, Pages 9-12

Context of the Site in Relation to the Plan

The Land at Chain Road, Glynneath AS(N) 24 is located within the Upper Neath Valley – which is identified as a 'strategic growth area' within the Deposit Plan⁶. Furthermore, within this context, the sustainability credentials of Glynneath in particular are outlined, as follows:

"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."

The concerns advanced in Matter 3 in relation to short-term deliverability, as outlined above, are particularly pertinent in the context of Glynneath – where Neath Port Talbot CBC anticipate that only 16 units are to be delivered up until 2019⁴. Should the identified issues of short-term deliverability arise in the context of these sites there would be significant concerns regarding the supply of housing in the Glynneath area and its potential to provide as a key settlement within the Upper Neath Valley Strategic Growth Area. Furthermore, the Park Avenue allocation (H1/23) – which comprises a significant proportion of the housing supply within the Neath Valley (150 of the 264 units allocated) - forms part of the wider Park Avenue Mixed Use Regeneration Scheme, and relies on the collaboration of a number of parties (both public and private sector). It is therefore considered that deliverability issues could arise in the context of this allocation.

In light of the above, it is considered that the Land at Chain Road, Glynneath AS(N) 24 is a deliverable site that could contribute to the vision and aims of the LDP through the provision of a substantial supply of housing in the short-term significantly 'de-risking' the supply of housing within the Plan.

Moreover, given the site's location within an area identified by the Plan as a 'key settlement' within a 'strategic growth area' it is considered that the allocation of the Land at Chain Road, Glynneath AS(N) 24 would assist with delivering the strategy and consequently making the Plan 'sound'. Furthermore, given the current housing land supply shortage, the fact that the site is inside settlement limits as identified in the UDP, the lack of any technical constraint or issue that cannot be overcome, and given that the site is an appropriate location in terms of delivering the Plan's strategy, it is queried why the LPA are seeking to delete or remove the allocation from settlement limits. This would accordingly constrain as opposed to facilitate the realisation of the Plan's strategy – raising questions over the Plan's 'soundness'.

Flood Risk

Hyder Consulting have been commissioned to undertake a Stage 2 Flood Consequences Assessment (FCA) in support of a proposed residential development of the site. The FCA was undertaken in accordance with the requirements of TAN15 and in line with guidance provided by NRW.

Whilst the Welsh Government Development Advice Map (DAM) indicates that the part of the site is located within Flood Zone C2, the FCA demonstrated that the development proposals are considered justified on the basis that:

⁶ Neath Port Talbot Deposit LDP: Paragraph 2.3.12

⁷ Neath Port Talbot Deposit LDP: Paragraph 4.0.30

- The proposal is in accordance with the Neath Port Talbot Unitary Development Plan designation for the site within the established settlement boundary;
- Consistent with the Local Authority's aspirations for the regeneration of the area; and
- In accordance with the aims of Planning Policy Wales, as the site is a previously developed site, which is located within a sustainable location.

All sources of potential flood risk to the site were considered by the FCA – which concluded that the proposed development site is not perceived to be at risk of flooding from groundwater, coastal or artificial sources.

With the implementation of a suitable surface water drainage strategy (which adopts appropriate SUDS techniques), there will be no significant risk to the proposed development from surface water flooding. The surface water drainage strategy would ensure that there is a reduction in surface water run-off from the site and that there will be no increase in third party flood risk.

Fluvial flooding from the adjacent River Neath has been identified to be the main source of flood risk to the site. As part of the FCA, hydraulic modelling has been undertaken, with results still being finalised but they show part of the site to flood. However, it is Hyder's opinion that the risk of flooding is manageable via incorporation of flood risk mitigation measures (e.g. raised development platform, compensation storage etc.) in the design of the development.

NRW have outstanding queries in relation to the technical modelling that has been carried out. As a consequence, in order to address NRW concerns, Hyder are in the process of refining NRW's existing model used to assess flood risk to the site and enhancing the representation of the proposed flood mitigation scheme (e.g. by adding the proposed flapped culverts, substation flood walls to the model). It is envisaged that the finalised modelling would confirm to NRW's satisfaction that with the proposed development configuration and indicative conceptual compensation storage scheme in place, the potential consequences of fluvial flooding on the site will be shown to be acceptable and manageable, in line with TAN15 criteria and NRW guidance.

In light of the above, it is considered that with further technical modelling works, and subject to the satisfaction of NRW, it will be demonstrated that flood risk does not pose a fundamental constraint to the allocation of the site, and indeed the inherent deliverability of residential development.

Concluding Remarks

In light of, and as a consequence of these representations, it is considered that:

- Land at Chain Road, Glynneath AS(N) 24 is a deliverable site that would contribute to the vision and aims of the LDP through the provision of a substantial supply of housing in the short-term significantly de-risking the Plan;
- the allocation of the site would directly meet the need for an additional supply of housing within the Plan, and would contribute to the Plan's provision of short-term deliverable sites, particularly in the key settlement of Glynneath within the Upper Neath Valley 'strategic growth area' – where it is particularly considered that there is insufficient short-term flexibility / contingency;
- given the site's location within an area identified by the Plan as a 'key settlement' within a 'strategic growth area' it is considered that the allocation of the Land at Chain Road, Glynneath AS(N) 24 would assist with delivering the strategy and consequently making the Plan 'sound'. It is

accordingly queried why the LPA are seeking to delete or remove the allocation from settlement limits - which would constrain as opposed to facilitate the realisation of the Plan's strategy – raising questions over the Plan's 'soundness';

- with further technical modelling works, and subject to the satisfaction of NRW, it will be demonstrated that flood risk does not pose a fundamental constraint to the allocation of the site, and indeed the inherent deliverability of residential development.

It is respectfully urged that the Land at Chain Road, Glynneath AS(N) 24 is allocated for residential development to ensure the Plan's 'soundness'.