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**By Email: [programmeofficer@npt.gov.uk](mailto: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 Forge Washery, Lower Brynamman, AS(N) 6**

Please find enclosed, on behalf of and under instruction from Tolkien Properties 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 Forge Washery, Lower Brynamman AS(N) 6.

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

These representations seek to respond to the questions raised within the Inspector's Matters and Issues. These representations only provide detailed responses to questions where it is considered necessary and relevant to do so. The submission ought therefore to be read in conjunction with the detailed representations submitted previously, albeit supersedes some content.

A planning application was submitted to the Authority in June 2008 under reference P2008/0798. This application has yet to be decided by the Authority despite a number of material considerations having been overcome by the applicant, relating to:

- Viability;
- Contamination;
- Archaeology;
- Affordable Housing provision;
- Ecology;
- Structural / foundation design.

Whilst previous detailed investigations and reports have concluded that the site is not susceptible to flooding, and the availability of more up-to-date data since the original assessment was undertaken as a result of a change/shift in the guidance on development within areas prone to flooding, additional work is required to verify the previous assessment work and thereby ensure that there is no risk.

### **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 rate<sup>1</sup>, 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<sup>2</sup>;
- 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<sup>3</sup>. 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)<sup>4</sup> 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 completions<sup>3</sup>.

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 Forge Washery, Lower Brynamman AS(N) 6 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

One of the key strategies of the LDP is of course to ‘reinvigorate the Valleys’ communities as set out in paragraph 2.3.11. A significant element of achieving this goal is to ensure that adequate housing is provided within these communities, and that the old industrial sites are regenerated. The development of these old industrial sites for housing is therefore intrinsic to the potential success and soundness of the LDP in delivering on this key aim.

The delivery of housing to reinvigorate the Valley Communities is seen by the LDP as one of the key drivers and it is noted that 1.4% (around 130 dwellings) of the housing requirement is directed to windfall sites within the Amman Valley.

There are no proposed allocations in the Amman Valley Area to ensure the delivery of these 130 units. Whilst the increased number of units aligned to the Amman Valley will help to set an overall context for achieving the desired regeneration, the lack of formal allocation raises serious questions as to the delivery of such units over the plan period (an average of 10 dwellings per annum).

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

<sup>2</sup> Welsh Government Examination Hearing Statement: Matter 2 Housing Provision, Feb 2015: Page 2

<sup>3</sup> Welsh Government Examination Hearing Statement: Matter 3 Housing Provision, Feb 2015: Page 9

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

Whilst some allocations are made in the Neath and Swansea Valleys, there are no such allocations in the remaining communities. The Strategic aim of regenerating/reinvigorating these remaining Valley Communities is put into jeopardy as a result by not providing the certainty of housing allocations.

It is therefore considered that the allocation of this specific site for housing needs to be provided within Valley areas in the Plan, and specifically the Amman Valley Area, as it represents the most deliverable site within the Amman Valley area to locate new housing and in order to give greater flexibility and certainty as to the development prospects and to meet the regeneration objectives over the Plan period, and therefore the soundness of the Plan.

As part of the promotion of this particular 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 as highlighted above.

The Inspector, however, raised some concern in respect of the following:

- Flooding;
- Contamination; and
- Connectivity.

As highlighted in previous submissions to the LDP process, each of these matters have been overcome through the processing of the planning application.

Furthermore, the residential redevelopment of the site will lead to the cessation of 'bad neighbour' development, and/or the prevention of intensification of the current industrial use which could lawfully occur under the current parameters. In addition, the redevelopment of the site is supported by the majority of the existing residents adjacent to the site, particularly in light of the improvements to the access to the site and the reduction in vehicle and pedestrian conflict through the removal of HGV movements associated with the current operational function of the site.

Accordingly it is considered that the Forge Washery site should be allocated for residential development, and located within settlement limits.

### **Concluding Remarks**

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

- Land at Forge Washery, Lower Brynamman AS(N) 6 is a deliverable site that would contribute to the vision and aims of the LDP to 'reinvigorate the Valley Communities' through the provision of a substantial supply of housing 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 sites in the Amman Valley area – where it is particularly considered that there is insufficient certainty for housing sites to come forward;
- its allocation would also bring about significant regeneration benefits to the area, both in supporting local services but also in removing a 'bad neighbour' in use terms from adjoining residential properties;
- 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 Forge Washery, Lower Brynamman AS(N) 6 is allocated for residential development to ensure the Plan's 'soundness'.