

Neath Port Talbot Local Development Plan

Examination in Public

Hearing Session 17 (23rd April 2015)

LAND AT TONMAWR RUGBY CLUB

PROPOSED ALTERNATIVE SITE (HOUSING LAND
ALLOCATION)

**Hearing Statement on behalf of
Tonmawr RFC**

March 2015

Summary

Proposal:

Neath Port Talbot LDP Hearing Statement

Location:

Land at Tonmawr Rugby Club

Date:

March 2015

Project Reference:

13.262

Client:

Tonmawr Rugby Club

Product of:

Asbri Planning Limited

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1.0 Introduction

- 1.1 Asbri Planning Limited have been instructed by Tonmawr Rugby Club to submit further evidence which supports our earlier Deposit Plan representations. Provisions in the LDP Deposit Plan Settlement Strategy refer to the need for flexibility in the Valley areas. In the case of Tonmawr, however, acknowledged in the Plan as a sustainable valleys community, 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 the community.

- 1.2 We refer specifically to land east of the Tonmawr Rugby Club clubhouse, where adjacent land is included in the adopted Unitary Development Plan but is proposed to be excluded from the Settlement Limits in the Deposit LDP. It is considered that a suitable form of development can be achieved on the site which meets the LDP’s Sustainability Objectives, and which would also provide revenue for the club to enhance recreation and community facilities. The rugby club has an important role in the local community.

- 1.3 In Section 2 of this Statement we therefore describe the site; Section 3 with reference to further evidence provided, responds to Matters and Issues raised by the Inspector; and Section 4 concludes the document.

2.0 Site Description

2.1 The village of Tonmawr is described In the Deposit LDP – Settlement Topic Paper (August 2013), under the Afan Valley Spatial Area 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.

2.2 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 lawned areas), and the open land to the east. The playing fields associated with the club, along with changing and parking facilities, are located 3-400 metres to the north.

2.3 The car park access is from Tonmawr Road to the north-west of the Club building. This access 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.

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.

3.0 Response to Inspector's Key Issue

3.1 This section examines the question below which is raised by the Inspector in respect of sites allocated in the Plan. Our responses follow:

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

3.2 The Deposit Plan representations made reference to the Spatial Strategy, and in particular Paragraphs 2.5.3 and 2.5.4. These refer to a more flexible approach to development in the Valleys compared to the coastal corridor, which will help to invigorate communities. The settlement strategy is identified as '*a fundamental mechanism, identifying communities that have the sufficient capacity and resources to accommodate development within designated boundaries*'.

3.3 The above elements of the Plan read as being sound. However, the means by which these aims are intended to be achieved, certainly in the case of the Alternative Site being promoted, are unsound. At this location, in a sustainable Valleys community in need of regeneration, it is the Council's intention to remove potential to accommodate necessary growth by reducing the extent of the settlement boundary. Furthermore no new allocations are proposed in the Afan Valley area, with only allowances for windfall and infill developments, which by definition have to be within settlement limits.

3.4 Development on and adjacent to the existing club house would achieve significant regeneration of the village, not only by providing new housing opportunities, but by financing a new club and training facility on land adjacent to the current rugby pitches. There would thus be significant benefits to the community and the regeneration of the area.

3.5 Such proposals would meet the aims of the strategic objectives in terms of '*Revigorating the area and improving economic prospects*'. Drawings produced in **Appendix 1** show how such development could be achieved in phases. Such 'state of the art' facilities would benefit the area and enhance its sustainability credentials.

3.6 The Deposit Plan representations described the existing range of services which exist in the village, including the primary school. Unfortunately the Council has a proposal

to close Tonmawr Primary School and transfer pupils to Crynallt Primary School in Cimla, Neath.

- 3.7 In this Hearing Statement, we wish to refer to a Community Impact Assessment which has been undertaken by the local authority, prepared in the context of the proposed school closure under guidance set out by the Welsh Government under Circular 006/2013: School Organisational Code. This is included as **Appendix 2**.
- 3.8 In this respect we wish to draw the Inspector's attention to Section 5 of the document which describes the extent to which the school acts as a community resource. In Section 6, the school is referred to as 'the lifeblood of the Rugby Football Club' in the context of mini and junior members of the club, and the free use given by the school by the rugby club for concerts and fund raising events.
- 3.9 In Section 7 of the Community Impact Assessment adverse impacts of school closure are highlighted, including less housing development, inability to retain young people, out-migration. And potential decline of other village facilities, including the church and post office.
- 3.10 There will consequently be a need for compensatory measures. Sections 8 and 9 of the Assessment refer to measures for further enhancing community based activities and facilities '*in order to make the best use of Tonmawr as a safe and attractive place to live*'. On such measure, specifically referred to in the context of interviews with local people would involve the improvement of the Tonmawr RFC clubhouse.
- 3.11 It can therefore be emphasised that proposals being pursued by the Rugby Club would deliver such improvements. However, the release of land for development adjacent to the existing clubhouse is the only means by which this could realistically be achieved through appropriate re-investment of receipts from the sale of the land.
- 3.12 As a consequence of the above we consider that the identification of the Alternative Site is essential to the soundness of the LDP if the 'flexible approach to development in the Valleys' is to be achieved as per the provisions of the Spatial Strategy. Proposals to achieve the regeneration of the Valley areas are also embodied in national policies

and the Council's Single Integrated Plan 2013-2023. The latter is a major document referred to in the LDP process with the Key Outcome identified of '*improving the sustainability of communities and the environment*'.

4.0 Conclusions

- 4.1 This submission has been prepared by Asbri Planning Ltd on behalf of Tonmawr Rugby Club with regard to Hearing Session 17 (Matter 11) and responds to Issues raised by the Inspector for consideration at the Neath Port Talbot Local Development Plan Examination.
- 4.2 It is apparent from evidence submitted that Tonmawr Rugby Club is pursuing proposals to upgrade facilities which can be of benefit to the community and neighbouring areas. The need for such improvements is compounded by proposals to close Tonmawr Primary School. A key element in mitigating the closure, identified in the Community Impact Assessment prepared by the Council, is the transfer of a range of activities currently accommodated in the school, to alternative venues. Such venues, including the rugby club, however, require substantial upgrading.
- 4.3 The retention of land adjacent to Tonmawr Rugby Clubhouse, either in settlement limits or as a housing land allocation is essential in order that new development can enable such proposals.
- 4.4 In response to the Inspector's question it is therefore maintained that this is a soundness issue that goes to the heart of the LDP process. If sufficient flexibility is not provided in valleys communities such as Tonmawr to allow for adequate growth to maintain and enhance facilities, the Plan will not meet requirements for regeneration in such areas, as favoured in national policies and the Wales Spatial Plan, and the Council's community strategy. Neither does it allow for the flexibility required by the Plan's own Spatial Strategy as it applies to the Valley areas. It therefore fails to meet Tests of Soundness C2, C3, C4 and CE4.

Appendix 1 – Preliminary Design Concepts

Appendix 2 – Community Impact Assessment