



**Geraint John Planning**

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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 to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45**

Please find enclosed, on behalf of and under instruction from Persimmon Homes West Wales and New County Leisure 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 20 in relation to Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45.

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 Persimmon Homes West Wales & New County Leisure. 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.

### Previous Representations Made

Representations previously submitted by Persimmon Homes West Wales & New County Leisure have outlined the suitability of the site for development. In summary, these are:

#### *Economic Viability*

- 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.

#### *Highways*

- 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.

#### *Sustainability*

- 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 area as compared to other, considerably more rural and remote areas.

#### *Environmental Health / Amenity*

- 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.

#### *Biodiversity / Landscape*

- 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 TPO's.

#### *Flood Risk*

- 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.

Furthermore, the key and principal representations previously submitted by Persimmon Homes West Wales & New County Leisure in relation to the Plan, are, in summary, as follows:

- The proposed site at Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 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;
  - Representations previously made have considered that the following policies are accordingly amended:
    - Policy H1 Housing Sites - amendment such that Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 is allocated as a residential development site;
    - Policy SC1 Settlement Limits - amendment such that the settlement limits around Coed Hirwaun include the proposed alternative site;
    - Policy EN3 Green Wedges – amendment such that the Green Wedge designation is removed from the areas within the proposed alternative site; and
    - Policy EN2 Special Landscape Area – amendment such that the SLA designation is removed from the areas within the proposed alternative 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;
  - 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.
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The wider benefits of allocating the site are outlined below in response to the relevant matters and issues raised below as part of the Examination process.

### **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>;
- The anticipated delivery of windfall sites, as noted in ED010 Phasing and Delivery Paper (January 2015)<sup>3</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>; and
- 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>4</sup>. This is particularly pertinent given that there is an 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.

Furthermore, in respect of the over-reliance on Coed Darcy, it should be noted that as a result of a Focussed Change to the Deposit LDP<sup>5</sup>, 135 units were removed from the Harbourside Port Talbot

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

<sup>4</sup> Welsh Government Examination Hearing Statement: Matter 3 Housing Provision, Feb 2015: Page 9

<sup>5</sup> Neath Port Talbot Deposit LDP: Schedule of Proposed Focussed Changes, September 2014; Focussed Change 13

housing allocation (H1/17), and subsequently placed in combination with other unit numbers (250 units in total) into the Coed Darcy allocation. This has compounded the issue of overreliance on Coed Darcy, effectively 'putting more eggs in a single basket', compounded the perceived imbalance in housing distribution, and accordingly put the delivery of the Plan at increased risk.

As such, it is considered that re-distributing this housing provision onto an inherently deliverable site in the Port Talbot area (within which Coed Hirwaun is located), as opposed to the Neath area (within which Coed Darcy is located) – would contribute to the robustness and 'soundness' of the Plan.

Moreover, following Hearing Matter 3, the Inspectors published their 'Preliminary Findings on Housing Provision' – which states the following with regard to the supply of sites within the Plan:

*"We continue to have concerns regarding the viability and deliverability of several of the allocated sites and it is, therefore, a matter which we will explore further at an additional housing session."*

The representations advanced with regard to housing supply, and the Inspector's subsequent findings, are clear and consistent that there are issues with regards to the deliverability of allocated and 'landbank' sites within the Plan. As such, it is considered that additional deliverable 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 outlined in previous representations on the suitability of the site, it is considered that the Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 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 Plan<sup>6</sup>. 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 are outlined here.

#### *Context of the Site in Relation to the Plan*

The Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 is located within the Coastal Corridor Spatial Area – which is comprised of Neath and Port Talbot and its supporting communities, and in which provision for the majority of new housing is to be made (as promoted in Strategic Policy SP5 Development in the Coastal Corridor of the Deposit LDP<sup>7</sup>).

The Deposit LDP notes that a housing supply on a mixture of brownfield and greenfield sites is sought, as noted in the following extract:

*"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*

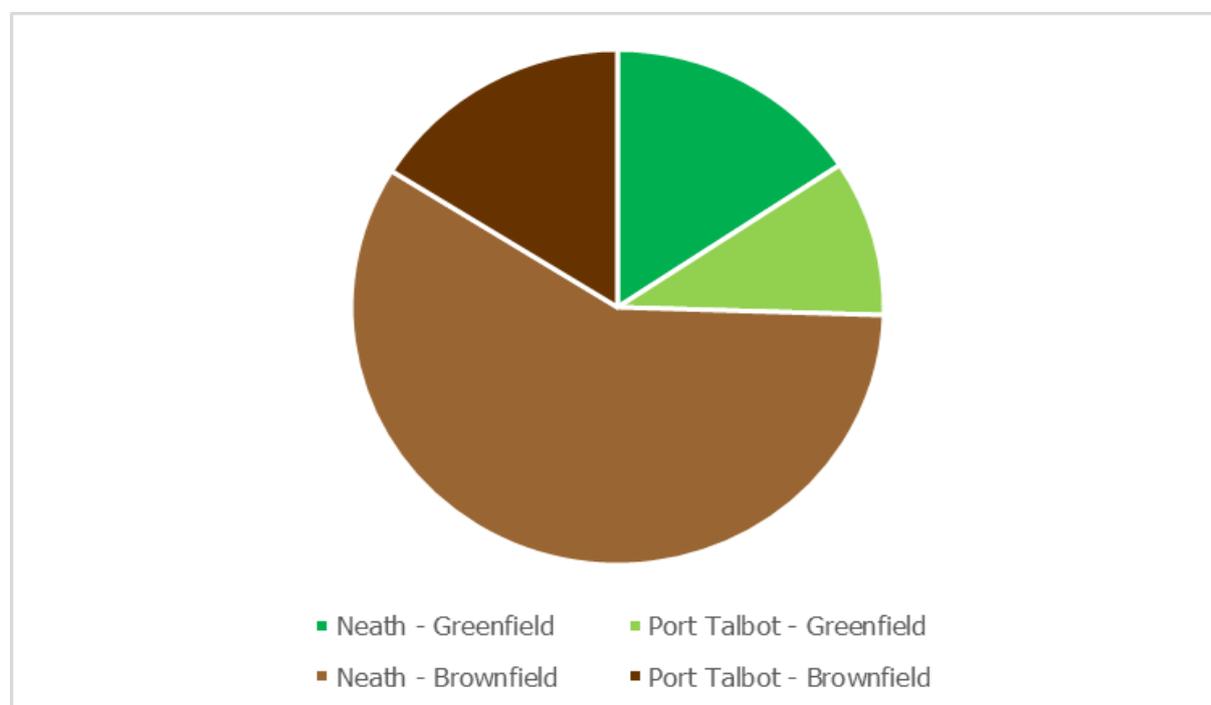
<sup>6</sup> Comments / Objections to the Plan: Deposit LDP Reps, Geraint John Planning, 15<sup>th</sup> October 2012, Pages 9-12

<sup>7</sup> Neath Port Talbot Deposit LDP: Paragraph 4.0.2

*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.<sup>8</sup>*

Whilst this approach is supported, it is not considered that an appropriate balance or mix of sites is included within the Plan, and indeed, the Coastal Corridor area in particular. As advocated by the Welsh Government, who noted in response to Hearing Matter 3: Housing Provision, that *'it is important that the plan makes provision for and enables delivery of a range and mix of sites that it has identified, taking account of viability issues<sup>9</sup>*, an improved balance and range of appropriate (and moreover deliverable) sites ought to be made. The concerns advanced in Matter 3 in relation to short-term deliverability, as outlined above, are particularly pertinent in the context of the Coastal Corridor.

A review of the housing allocations within the Coastal Corridor Spatial Area has been undertaken as part of these representations – the results of which are included in Appendix A, and summarised in the chart below:



H1 Coastal Corridor Allocated and Landbank Sites: Existing Land Use

The review of housing allocations within the Coastal Corridor Spatial Area demonstrates that there is an over-reliance on brownfield sites – which generally have greater site constraints, and often have significant remediation costs impacting on development viability. All of these factors potentially lead to a significant reduction in the ability of allocated sites to contribute towards planning obligations, such as affordable housing etc.

The above stance was advanced by the Welsh Government in their representations to Hearing Matter 5 in relation to affordable housing, wherein, it was stated that; *'the characteristics and make up of*

<sup>8</sup> Neath Port Talbot Deposit LDP: Paragraph 2.5.22

<sup>9</sup> Welsh Government Examination Hearing Statement: Matter 3 Housing Provision, Feb 2015: Page 7

sites in Neath Port Talbot are predominantly brownfield, which are more likely to have abnormal development constraints<sup>10</sup>. Furthermore, it is acknowledged that the Inspector(s) has / have raised some concern regarding the level of provision of affordable housing during the Plan period. The Local Housing Market Assessment (LHMA)<sup>11</sup>, identified a need for 3,100 affordable units over the Plan period (2011-2026), which equates to 36% of the overall housing requirement now proposed by the Council of 8,600 units. Neath Port Talbot CBC's representation to Hearing Matter 5 states that it is predicted that 962 affordable housing units will be delivered through sites allocated within the Plan, and approximately a further 773 affordable units through 'landbank' sites. This equates to 20% of the overall housing requirement. As such, the Plan provides a shortfall of 16% affordable housing when compared with the currently identified need. It is considered that this is not in line with the aspirational, pro-active approach adopted by the LDP strategy.

In light of the above, should the identified issues of short-term deliverability arise in the context of the allocated and 'landbank' sites there would be significant shortcomings regarding the supply of housing, and indeed affordable housing, in the Coastal Corridor Area. Moreover, the potential to deliver / implement Strategic Policy SP5 and Policy AH1 – which are considered integral to the soundness of the Deposit Plan, would be compromised.

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 and improved 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.

As such, it is considered that the Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 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, and affordable housing in particular, significantly 'de-risking' the supply of housing within the Plan.

Moreover, given the site's location within the 'Coastal Corridor' - an area identified by the Plan as providing the majority of new housing, it is considered that the allocation of the Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 would assist with delivering the strategy and consequently making the Plan 'sound'. Furthermore, given the current housing land supply shortage, 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 omit the Allocation of this site from the Plan. This would accordingly constrain as opposed to facilitate the realisation of the Plan's strategy – raising questions over the Plan's 'soundness'.

### **Concluding Remarks**

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

- Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 is a deliverable site that would contribute to the vision and aims of the LDP through the provision of a substantial

<sup>10</sup> Welsh Government Examination Hearing Statement: Matter 5 Affordable Housing, Gypsy and Traveller Provision and Other Specialist Housing, March 2015: Page 5

<sup>11</sup> Swansea and Neath Port Talbot LHMA Report of Findings 20/08/2013

supply of housing, and affordable housing in particular, 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 Coastal Corridor Spatial Area – where it is particularly considered that there are insufficient short-term deliverable, greenfield sites, and therefore an inherent lack of flexibility / contingency;
- given the site's location within the 'Coastal Corridor' - an area identified by the Plan as providing the majority of new housing, it is considered that the allocation of the Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 would assist with delivering the strategy and consequently making the Plan 'sound'. It is queried why the LPA are seeking to omit the Allocation of this site from the Plan, as if not included, it would constrain as opposed to facilitate the realisation of the Plan's strategy – raising questions over the Plan's 'soundness'.
- as a product of the Examination process to date there is clearly significant doubt over the ability of a number of allocated and land-bank sites to yield and contribute to the housing supply (as raised by the Inspectors), and as such there is a need for alternative deliverable sites to be identified and to come forward.

It is respectfully urged accordingly that Land to the NE, SE & SW of Coed Hirwaun (Site Options 1 & 2) AS(N) 44 & 45 is allocated for residential development to ensure the Plan's 'soundness'.

**APPENDIX A: COASTAL CORRIDOR SPATIAL AREA – HOUSING SITE REVIEW**

Site Location	Allocation	No. of Units <sup>12</sup>	Brownfield / Greenfield <sup>13</sup>
<b>Neath</b>			
Gorffwysfa Care Home	H1/ 1	15	Brownfield
Leiros Parc Extension	H1/ 2	200	Greenfield
Groves Road (Phase 2)	H1/ 3	42	Greenfield
Ocean View, Jersey Marine	H1/ 4	81	Brownfield
Dwr Y Felin Lower School	H1/ 5	100	Brownfield
Hafod House Care Home	H1/ 6	12	Brownfield
Neath Town Centre	H1/ 7	50	Brownfield
Crymlyn Grove (Phase 2)	H1/ 8	75	Greenfield
Crymlyn Grove (Phase 3)	H1/ 9	150	Greenfield
Wern Goch, Skewen	H1/10	50	Greenfield
Neath Road/Fairyland Road, Tonna	H1/11	300	Greenfield
Wauanceirch	H1/LB/1	13	Greenfield
Groves Road (Phase 1)	H1/LB/2	34	Greenfield
Elba Crescent	H1/LB/3	50	Brownfield
Area 1, Coed Darcy Urban Village	H1/LB/4	157	Brownfield
Coed Darcy Urban Village	H1/LB/5	2400	Brownfield
Eaglesbush, Melincryddan	H1/LB/6	50	Greenfield
Garthmor Phase 2, Melincryddan	H1/LB/7	34	Greenfield
Briton Ferry Road	H1/LB/8	28	Brownfield
The Ropewalk	H1/LB/9	12	Brownfield
Barrons Court	H1/LB/10	15	Greenfield
Cardonnel Road	H1/LB/11	16	Brownfield
Crymlyn Grove (Phase 1)	H1/LB/12	81	Greenfield
<b>Port Talbot</b>			
Blaenbaglan School (r/o), Baglan	H1/12	141	Greenfield
Hawthorn Close, Cwmafan	H1/13	100	Greenfield
Western Logs, Cwmafan	H1/14	130	Brownfield
NPT College Margam Campus	H1/15	70	Brownfield
Glanafan Comp. School	H1/16	50	Brownfield
Harbourside	H1/17	385	Brownfield
Afan Lido / Tywyn School	H1/18	150	Brownfield
Bay View Social Club Site	H1/19	23	Brownfield
Purcell Avenue	H1/20	115	Greenfield
Morfa Afan Care Home	H1/21	10	Brownfield
Tir Morfa Road	H1/22	75	Greenfield
Blaenbaglan Farm	H1/LB/13	160	Greenfield
Thorney Road, Baglan	H1/LB/14	10	Greenfield
Stycyllwen, Baglan	H1/LB/15	24	Brownfield
Abbottsmoor, Baglan Moors	H1/LB/16	42	Brownfield

<sup>12</sup> Based on Neath Port Talbot, ED010 Phasing and Delivery Paper (January 2015): Page 13<sup>13</sup> Based on land uses set out in Neath Port Talbot, LDP Implementation Plan (August 2013)

Site Location	Allocation	No. of Units <sup>12</sup>	Brownfield / Greenfield <sup>13</sup>
Farteg Fawr	H1/LB/17	25	Greenfield
Copperminers, Cwmafan	H1/LB/18	90	Brownfield
Forest Lodge Lane	H1/LB/19	12	Greenfield
Groeswen, Margam	H1/LB/20	39	Brownfield
Station Road	H1/LB/21	14	Brownfield
Royal Buildings, Talbot Road	H1/LB/22	46	Brownfield
Dyffryn Road, Taibach	H1/LB/23	14	Greenfield

Existing Land Use Type	No. of Units	Proportion
<b>Neath</b>		
Greenfield	1044	21.19%
Brownfield	3884	78.81%
Total	4928	100.00%
<b>Port Talbot</b>		
Greenfield	652	37.80%
Brownfield	1073	62.20%
Total	1725	100.00%
<b>Coastal Corridor Totals</b>		
Greenfield	1696	25.49%
Brownfield	4957	74.51%
Total	6653	100.00%