

Neath Port Talbot Local Development Plan  
Public Examination

Hearing Session 20 (Matter 11)  
Alternative sites (4) 29-April 2015

Proposed alternative site  
Former Washery at Tirbach Ystalyfera - site SV7

Prepared by: Robert Maggs (ID 0125)

08 – April - 2015

## **Introduction/Background**

The site is approximately 26 acres in size and is immediately adjacent to the current residential boundary part way down Tir Bach road – the site is at the end of Tir Bach road.

The site is accessed off the A4067 Ystalyfera bypass and has an elevated river frontage. This parcel of brownfield land, located between two halves of the settlement of Ystalyfera, which is served by a wide range of local services and facilities, is easily accessible by public transport and as shown below all Investigations so far undertaken have thrown up no issues that would prevent or deter a development.

Several site meetings have over the past six years taken place with NPT council officers from various departments of the council, these include: Planning, Policy and Highways.

A certain amount of background work and enquiries have also been done with respect to Flood, contamination, Highway layout and pedestrian access.

As already stated so far no issues or problems have been raised with any of the above points. The site is above any flood area (elevated above river). Any contamination so far identified is limited to its original use of coal. Highways /vehicular access has been preliminary assessed and some initial sketches drawn up by a local engineering company, pedestrian access has been shown to be possible linking the site to both halves of the village. A site meeting with the highways manager proved useful as all parties agreed that upon the reviews/work so far done vehicular and pedestrian access do not pose a problem.

Two options for the site have been submitted to the LDP, one large development or split the site into two, one half being developed first with the rest of the site being monitored by the council for further development if demand is proved.

Enlarging the present boundary to include the site within the village envelope would be a natural extension to the current residential boundary.

The current use of the site (a training facility for plant machinery operators) will cease at the end of this year, the site will then become vacant.

## **Response to Matters and Issues**

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

- The preferred option by the council appears to be focused quite tightly on the M4 corridor with the distribution of housing within the Plan over-reliant on the development of Coed Darcy, an old oil refinery which has its own challenges of contamination etc. This M4 focus is to the detriment of the upper (Swansea) valley area.
- There is a need for additional housing across the UK and the NPT calculation has been questioned and commented on by the Welsh Government as ‘the LDP could plan more positively through an increase of around 400 dwellings’.
- A stated aim and one of the ‘*key strategies*’ of the LDP is the re-invigoration of the valleys. This aim is not met and fails as the council preferred option for the Swansea valley stops at Pontardawe. Any further future development in the upper valley being left to infill/windfall sites etc, no large scale development is allowed. The LDP will therefore in fact have the opposite effect to its stated intention with respect to the upper valleys.
  - The LDP current policy will ensure people leave the upper valley area due to lack of available high quality housing within the village of Ystalyfera. If any family wishes to move to a larger ‘quality - detached type’ dwelling they must move from the area (probably down to the M4 corridor) or to a neighbouring town down the valley.
  - There is therefore a need for aspirational high quality housing to allow people born and bred in Ystalyfera to remain with their families and so support the upper valley.
- Health and wellbeing of the public does not seem to have a high enough focus in the LDP, as again the over reliance on the development at Coed Darcy which is adjacent to the M4 motorway ensures people are living in relative close proximity to the busiest road in South Wales with all of the noise and atmospheric pollution (Diesel particulates etc) that a motorway of this size brings.
  - Developments further up the valley remove people from exposure to these known carcinogenic pollutants and allow them to live in a ‘clean air’ environment.
  - Ystalyfera is close to the edge of the Brecon Beacons national park whilst being only 12 minutes away from Junction 45 of the M4 motorway. So the area can deliver a healthy environment whilst still being in easy reach of the main S.Wales motorway.
- Previously developed / brownfield sites – the redevelopment of which is supported in advance of greenfield sites, at both the national and local levels should take precedence and be pursued before any green field development is considered. The LDP does not take this approach into account, its proposed additional development of greenfield land at Bryncoch is a case in point, how can a green field site take precedence over a brown field site only a short journey away by car?

- The LDP does not seem to take consideration of, or advantage of, previous large council expenditure programs, The A4067 has been developed over a number of years and now provides a new quick road/bypass to several towns located along the Swansea valley, Clydach, Trebanos, Pontardawe, Ynysmeudwy, Ystalyfera, all have been bypassed by this new road which stretches from Jct 45 of the M4 up to and beyond Ystalyfera. The LDP should look to build on this investment, - a new/improved A4067 road - which must have cost tens of millions of pounds!
  - What was this road built and paid for if not to support developments of this kind and allow the re-invigoration of the upper Swansea valley?
  
- The LDP does not make any mention to the adjoining / neighbouring authorities LDPs. In the case of the old washery (Tir Bach) site at Ystalyfera, the Powys LDP does not seem to have been referenced/considered despite the fact that the neighbouring/adjoining town of Ystradgynlais comes under the authority of Powys council. Their (Powys) web site states that they recorded the lowest completions rate of new dwelling across the *entire* county in 2011/12 – a total of 98 dwellings built (*ref. Powys deposit draft July 2014 - 2.2.22*), this indicated a substantial reduction in new homes built over the preceding decade. Their plan states an annual requirement of 333 new homes needed to be built in order to meet their stated target of 5000 over the lifetime of their LDP.
  - The NPT LDP should take into account the work/and housing needs of the neighbouring authorities where their boundaries meet, large scale developments in the upper Swansea valley by NPT will not only serve the Neath and Port Talbot council area but also the Powys area, so the accuracy of the figures for future housing requirements in the upper Swansea valley made by NPT can be questioned.
  
- The NPT LDP does not take into account/acknowledge ongoing building and infrastructure improvements in the upper Swansea valley.
  - There are major recent/current investments in school reorganisation/improvements in the near vicinity of the Tir Bach washery site on both sides of the county boundary. These include the provision of new-build primary schools in Ystradgynlais (Powys) and the planned multi-million pound 3-18 welsh medium campus at Ystalyfera. These high standard school developments would be complemented by good quality housing.
  - Ystalyfera is now also benefitting from the Welsh Government/BT fast broadband upgrade project making living and working in the area more attractive and viable.

## **Conclusion**

I believe there is a lack of balance in the proposed plan, the spread of housing across the area is over reliant on a small number of locations to the detriment of the upper valleys. The LDP does not actively prioritise the development of brown field sites over greenfield.

The LDP does not take into account the effect that the contribution of the development in improving the setting and appearance of an old 'coal site' - Tir Bach washery - can have on the well-being of the current residents of the village. It does not acknowledge the potential change in the dynamic of the village by making available high quality housing (both detached houses and riverside apartments) can have by actually encouraging people to move to the area and so support the local retail trade and encourage employment / business into the area, instead of the opposite effect of giving people the only option to leave the area as is the current effect the plan will likely have.

The LDP does not seem to 'join-up/improve' upon previous large expenditure/developments of the council ie. the new A4067 road from the M4 up the valley, or take into account the ongoing and planned infrastructure improvements in the immediate vicinity. It also fails to consider the needs of neighbouring authorities and how their (NPT LDP) can be improved to take advantage of other authorities (Powys) needs by accommodating them and so meet the re-invigoration aim of the upper valleys.

This site, the former washery at Tir Bach Ystalyfera (NPT ref: SV7) is ideally located between the two halves of the village. The site has been shown to have viable pedestrian access to each side of the village including two new supermarkets (ASDA and Tesco), excellent access to all of the village amenities. Development of the site would also remove any possible future 'dirty use' and enhance the environment of the village.

The location of the site is 'unique' within the whole of the NPT area, with elevated river frontage and uninterrupted views to the Brecon Beacons whilst being only 12 minutes from the M4.

The LDP in its present implementation therefor is not sound and is shown to fail in at least one of its key strategic aims in not supporting the re-invigoration of the upper (Swansea) valley area.

Inclusion of the site would support the stated aims of the LDP and help ensure that the 're-invigoration the upper (Swansea) valley' is met. It would develop a brown field site another aim of both local and national government. It would give local people a choice to be able to stay in the immediate area and would encourage people to move to the upper valley and be able to live in a healthier environment instead of encouraging them to leave to a more built-up area or live next to a motorway, It would actively support the new infrastructure (school developments) by encouraging people into the area.

When taking all of the above points into account, Inclusion of this site would ensure the 'soundness' of the LDP.