

NEATH PORT TALBOT COUNTY BOROUGH COUNCIL
LOCAL DEVELOPMENT PLAN

HEARING STATEMENT

On Behalf of:	Mr Vic Price and Mr Eric Patterson
Relating to:	Session 20 (Matter 11): Alternative Sites (4)
Proposal:	Proposed development sites, Port Talbot
Site:	Land at Penhyddwaelod, Bryn

Report By: Matthew Hard MRTPI
Our Ref: 2008/079
Representor No.: 0148
Date: February 2015





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Project Number:	2008/079

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1 INTRODUCTION

- 1.1 This statement has been prepared by CDN Planning (Wales) Ltd (“CDN”) on behalf of our clients Mr Vic Price and Mr Eric Patterson. CDN are instructed to act for Mr Price and Mr Patterson in submitting representations on the Neath Port Talbot (“the LPA”) Local Development Plan (“LDP”).
- 1.2 This statement is set out to address the matters and issues raised by the Inspector in advance of the examination hearings. It refers to various Core Documents using the code attributed to the documents within the examination library, e.g. SD04 is the deposit LDP dated August 2013, although for ease of reference the title of the document is referred to at its first use.

2 BACKGROUND

- 2.1 CDN have been acting for Mr Price in respect of this land since the 1990s and for Mr Patterson also for a number of years. There have been regular submissions to various development plans in that time. Over the same period, Bryn has experienced a decline in the availability of housing, of services and of facilities.
- 2.2 The land was submitted as separate Candidate Sites, but following a meeting with the LPA in November 2012 it was agreed that Mr Price and Mr Patterson would combine their sites into one package, which gives more opportunities for Bryn and a more sustainable development scheme.
- 2.3 Within the alternative site submission, CDN stated that:-

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“The proposed use is predominantly a mix of housing types, but the site is also capable of providing open space (including play space, recreational land, amenity space, green infrastructure and wildlife corridors), improved rights of way, employment land, community facilities etc, tourism/leisure facilities and renewable energy generation.”

- 2.4 The submitted information at the Alternative Sites Stage is appended herewith (Appendix A).
- 2.5 The LDP’s strategy divides the county borough into two: the coastal corridor and the valleys. This division is based on spatial housing areas. The result is that settlements such as Bryn are located in the Port Talbot spatial area, which is correct in terms of geography, accessibility and connectivity, but which does not recognise the characteristics of Bryn that are far more similar to the valleys areas than the towns along the coastal corridor. The resulting allocations in the LDP do not recognise the characteristics of each settlement, nor the fact that Bryn is as accessible to Maesteg as it is to Port Talbot.
- 2.6 Sites that have a southerly aspect are ideal for delivering development that is highly energy efficient, in terms of housing being oriented in the optimum direction to the sun. Moreover, southerly aspects increase the prospect of micro-generation being installed on houses to further reduce the reliance on fossil fuels and address the causes and consequences of climate change.
- 2.7 The site is large enough to accommodate not only housing but also employment uses, which would be vital to support the regeneration of Bryn. These would likely include live/work units, small flexible office space, workshops or commercial units.
- 2.8 There has been interest from a developer in the site (see also new evidence at Appendix B from a local agent).
- 2.9 Whereas the LPA have sought to extend many of the settlements within the LDP, they have ignored Bryn. Bryn Primary School is threatened with closure. Bryn is traditional community whose school is vital to local residents. The school’s pupils over the decades have forged friendships that extend beyond the school walls. Settlements such as Bryn need housing stock to retain the generations of children growing up in the village, as well as to ensure ongoing viability of the village through new population growth. Appendix C refers.

3 MATTERS AND ISSUES

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

- 3.1 The submitted LDP Vision (page 13 of SD04) states in part:-

“The County Borough’s rural areas and valley communities will be supported and revitalised through encouragement of new and expanded economic activity through provision for sustainable small scale employment, including tourism initiatives capitalising on existing successes such as the Strategic Tourism Destinations at Margam Park and the Afan Valley.”

- 3.2 However Bryn will not be supported by the LDP: it will not be revitalised with new economic activity and there will be no resulting small-scale employment. It is likely

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that the community will continue to suffer the closure of local services during the lifetime of the LDP.

3.3 LDP Objective OB3 states:-

“Deliver sustainable, safe and confident communities and develop vibrant settlements supporting a range and mix of facilities and services.”

Objective OB4 states:-

“Maximise accessibility to a range of leisure, recreational, health, social and community facilities in line with the role and function of settlements.”

3.4 In order to make Bryn a vibrant settlement it needs to have sufficient land for the development of new homes, for both longstanding families who otherwise will move out and for people moving into the area. It also needs new homes to protect its existing community facilities and services, which in turn will encourage new facilities and services (which can be included on the alternative site along with housing of different types and tenures).

3.5 The LDP aims to “reinvigorate the Valley areas” (Objective OB6) but does not seek to reinvigorate settlements that share the characteristics of the Valleys but which are located within the Port Talbot hinterland, such as Bryn.

3.6 The LPA have therefore advocated a spatial strategy that does not respect the actual situation in the county borough. There are identified needs and shortfalls within existing settlements and communities that the LDP fails to address.

3.7 The continuing decline of Bryn will occur if the LDP is adopted in its submission form.

3.8 Furthermore, even if the LDP strategy is sound, the policies and allocations as included in the deposit LDP will not deliver the strategic objectives – certainly not within the village of Bryn.

3.9 **Therefore, without allocating land at Bryn, the LDP fails to have a coherent strategy from which its policies and allocations flow and fails to meet Test CE1.**