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AS(N)21 Ty-Pwdr

Ty Pwdr Session 19 10.00 hours Tuesday 10th July 2012

rescheduled

to 9.00 hours Friday 6th July 2012

Ty-Pwdr has been continuously included in the settlement boundary for more than 25 years and it is considered this recognition should carry weight thereby retaining Ty Pwdr site in the Local Development Plan allocation and within the settlement's boundary (See Documents 1 Schedule A: Title Gwent Structure Plan 17/08/1984 Page 17 and the Abertillery Local Plan September 1985 page 37 (attached) adapted 14th April 1987).

AS(N)21 – Ty-Pwdr

Question 1: Is there a need to identify any additional or alternative sites for housing/or live to work activity?

Response by Mr I. Watkins/Ian Roberts Consultancy

To preface any considHFF8c9.,xJEEFU8o9.FxJ–HCI8nT f a.IUFF8/9,ExC6F,8i9.CxH–H,I89.FxJ–H

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- ii) The number of Housing Allocated Units defined on the proposal map amounted to a further 290 on five sites all of which were private. Not one of these units was delivered. It is difficult to believe that out of an aggregate total of 440 committed and allocated units provided for in the plan; only 45 public sector units were delivered. This amounts to a success rate of 10.2%.

A more damning indictment was that 93 private committed units and the 290 private allocated units had been brought forward from the 2001 adopted Development Plan as undelivered units. In other words there was a massive failure to deliver housing over a period which spanned two local development plans particularly at a time of buoyancy in the housing market.

This didn't start in 2001. I have a copy of a development plan for 1985

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In addition the development plan does not cater for

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Section 6.0 Strategic Policies

- Page 28 Item 6.15. The main difference between the south and north is that the south has fewer opportunities for development due to topographical constraints.
- Page 31 Item 6.29. The LDP provides a framework for the development of 3,666 new dwellings.

But does it!!

If the 16% delivery in the southern part of the borough is replicated throughout the borough, a problem will exist. I suggest a similar forensic exercise be undertaken throughout the borough to confirm more realistic statistics.

- Page 33 SP5 Spatial Distribution of Housing Sites, Lower Ebbw Fach 350 dwellings out of total of 3666 for the whole of the borough.
- Item 5.36. Is the Lower Ebbw Fach hub sustainable if a significantly lower number of houses are realised?

Section 8.0 Allocations & Designations

- Page 89 Item 8.28 In order to stimulate growth etc settlement in the south of the County Borough will rely heavily on small sites and windfall development.

Does this mean that all the brown field sites have been used up and therefore should we be looking for other sites?

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Section 9.00 Delivery & Implementation

Funding Sources & Responsibility for Delivery



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Question 3:

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Appendix 2 Pages 1 and 2. As exemplified above, the Authority's approach to SINC designation is flawed. Moreover, at page 2 their rebuttal revolves around description, analysis of the SINC notification form. Greenmeadow Farm is 42.46 hectares whilst Ty-Pwdr is 8 hectares (20% of the site) and no mention is made of Ty-Pwdr. The Authority's ecologist review seems to suggest there has been no effort to protect Acid Grassland which species justifies SINC designation. A study of the criteria for the selection of SINC in the Mid Valley Area (CS SINC MVA) H6 Acid Grassland makes a more specific requirement in paragraph 2 and 3, page 26 (as attached) for SINC inclusion.

Unimproved acid grassland refers to SWARDS which contain a high proportion of the species listed as community constants as described by Rodwell (1992)

To be considered for selection the site must contain 7 or more indicator species from

Table 4 Page 2

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Therefore only three indicator species exist in Area 6 and those same species are identical to Area 5.

Area 6A steeper slopes form the westerly margin of meadow area 6 very wet, dominated by rushes four species of grasses exist in this area together with two species of rushes. One of which is Juncus Squarrosus and is an indicator species. Although 18 flowering plants exist, none of which are indicator species

Area 7 Ty-Pwdr Farmhouse and the surrounding area to the west is heavily disturbed with no conservation value.

Area 8 wet marshy grassland is dominated by rushes and tufted hare grass. Three species of grasses exist, with three types of rushes and a further six types of flowering plant. None of the above are classified as indicator species. This area has

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Summary of Issues of Concern

If the Deposit Local Development Plan is to show vision, private developers in the south of the Borough must be given incentive to bring forward schemes using some blue sky thinking.

1. It could be that there should be a presumption in favour of private development in the south of the Borough.
2. Planners should be encouraged to engage with developers and seek the potential of actively seeking development on appropriate sites. Ty Pwdr is such a site.
3. Heritage – It is noted that the Authority no longer regards archaeological features to be of any significance with regard to the Ty Pwdr land.