

Blaenau Gwent County Borough Council  
Local Development Plan

Hearing Session 4: Housing Sites

Wednesday 27 June 2012

Examination 2012

Blaenau Gwent County Borough Council Submission

Examination Statement Reference No:	ES4.9
Submission date:	15 <sup>th</sup> June 2012

## SESSION 4

It is considered that the Preferred Strategy (SD25) put forward a sufficient variety of options based on overall levels of change and spatial distribution.

Option 1: Regeneration (Continuation of the Unitary Development Plan (UDP) Strategy) was considered a negative growth scenario. If the level of growth contained in the UDP for 117 houses per annum was used as a dwelling led projection it would result in a continued loss of population. This is due to different assumptions about household size than was previously used. As there is already a sufficient supply of committed housing sites to meet this requirement there would be no need to release any more housing sites. However, there would be very little opportunity to deliver affordable housing, play space or community facilities as most of the sites gained planning permission before a policy framework to address the need for affordable housing and general planning obligations were put in place.

The main aim of Option 2: Growth and Regeneration is to increase the population from 69,300 in 2006 to 71,000 by 2021; this is in accordance with the Wales Spatial Plan (W34) aspirations of retaining and attracting residents to the area. This will result in the need to provide 3,000 new homes over the Plan period. As there is a sufficient supply of committed housing sites this will result in the need to identify sites for further 800 houses in the area. From an assessment of the candidate sites it is clear that most of the sites are in the Heads of the Valleys area. This would accord with market demand which tends to focus on the three towns of Tredegar, Ebbw Vale and Brynmawr at each of the Heads of the Valleys.

Option 3: Balanced and Interconnected Communities contains a moderate level of growth and attempts to spread the growth more evenly across the County Borough. This option stabilises the population level at 69,300. This results in the need for 2,355 houses to be provided over the Plan period. This would require the identification of sites for 200 more houses than already have planning permission. These 200 houses would be identified in the Ebbw Fach Valley. As a result, the opportunities for securing affordable homes will be minimal.

The appraisal of the strategic options found option 2 (SD26) to be the most sustainable. The Preferred option is envisaged to potentially create a diverse economic base, improving employment opportunities as well as access to a range of services and facilities.

As set out in SD30 Candidate Site Methodology Paper, stages 4 and 5 of the candidate site assessment process assessed the sites against the Preferred Strategy and the LDP Sustainability Objectives. Appendix 1 summarises the results of this process for all candidate sites.

**Have the site selection and policy designation processes been based on appropriate criteria supported by a clear audit trail?**

A clear audit trail of the site selection and policy designations processes is set out in:



**2. Are sites H1.1 (Willowtown School), H1.15 (Warm Turn, Six Bells) and H1.20 (Land at Farm Road, Swffryd) appropriate for housing? If not, why not?**

Yes. The Council consider that sites H1.1 (Willowtown School), H1.15 (Warm Turn, Six Bells) and H1.20 (Land at Farm Road, Swffryd) are appropriate for Housing.

The allocation of sites for housing followed a robust and methodical assessment process to ensure that every allocated site is capable of development and can contribute to the delivery of the Strategy.

The Candidate Site Methodology Background Paper (SD30) sets out the assessment process in full. To summarise each site was subject to:

Stage 1: Initial Planning Assessment undertaken by the Planning Policy Officers

Stage 2: Expert Assessments undertaken by internal officers of the Council

Stage 3: Consultation with appropriate bodies

Stage 4: Assessment of the site against the Preferred Strategy

Stage 5: Assessment of the site against the Local Development Plan (LDP) Sustainability Objectives

Stage 6: Finalisation of sites for the Deposit LDP

#### H1.1 Willowtown School

This site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site Reference Number B44). The results of this process are clearly set out in SD32c.

To summarise, the site is brownfield land with its former use being a primary school. The site is a vacant development platform with the exception of two

enhancement plan and a preliminary risk assessment would be required at the full planning application stage. A survey requirements table is set out in Appendix 1 SD10a and indicates the surveys that should be undertaken and submitted to the Local Planning Authority as part of any future planning application.

Consultation with external bodies during stage 3 of the candidate site assessment process identified that the site was acceptable for further consideration.

The site performed well against the Preferred Strategy and Sustainability Appraisal Objectives when compared to other sites proposed for residential use (Appendix 1).

The site is considered sustainable, developable and compatible with the LDP Strategy and therefore is appropriately allocated for housing in the Deposit LDP.

#### H1.15 Warm Turn

The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site Reference Number D23). The results of this process are clearly set out in SD32e.

To summarise, the site is a flat area of vacant brownfield land to the south west of the residential area of Six Bells. The site is south of the upper plateau created for the Six Bells Colliery Site.

The site is sustainably located within the existing residential area of Six Bells. The site is well located in terms of community facilities and is accessible by other modes of transport other than the car. The site is not located in close proximity to an area of international/national importance for biodiversity and is acceptable in terms of flood risk.

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In the final stage of the candidate site assessment process the site performed well against the Preferred Strategy and Sustainability Appraisal Objectives when compared to other sites proposed for residential use (Appendix 1).

The site is considered sustainable, developable and compatible with the LDP Strategy and therefore is appropriately allocated for housing in the Deposit LDP.

#### H1.20 Land at Farm Road, Swffryd

The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site Reference Number D24). The results of this process are clearly set out in SD32e.

The site occupies an elevated location east of the settlement of Swffryd. The land is greenfield with part of the site formally used as a playing pitch. To east of the site are residential properties and the remainder of the site is surrounded by open space.

The site is well related to the existing settlement of Swffryd. The site is well located in terms of community facilities and is accessible by other modes of transport other than the car. The site is not located in close proximity to an area of international/national importance for biodiversity and is acceptable in terms of flood risk.

The results of the candidate site assessment process identifies that access will only be permitted via Gordon Avenue subject to local highway improvements. Secondary vehicular access will also be required via Farm Road. A transport assessment is required at the full planning application stage (SD10a, Appendix 1).

It is acknowledged that the site is known to support species and habitats, part of the site is within a SINC designation and there are visual impact concerns. It is therefore identified that a full ecological survey including trees and significant vegetation, a biodiversity constraints and enhancement plan and a visual impact assessment would be required at the full planning application stage (SD10a, Appendix 1).

As a result of representations received to this site, the Site Descriptions document (SD34) which has been prepared to provide more detail on the allocated land has been updated to reflect that the detailed design of the development and provision of open space is critical to this site and the landscape quality of the site.

In the final stage of the candidate site assessment process the site performed well against the Preferred Strategy and Sustainability Appraisal Objectives when compared to other sites proposed for residential use.

As reflected in SD32e, a larger parcel of land was assessed which was based on the Unitary Development Plan allocation (SD127a



grass rather than concrete, therefore resulting in potential for land contamination. As a result of this illegal activity on the site, the landowner has been instructed to clear the land.

The Environment Agency Wales confirmed that the site has not been tested in terms of land contamination, however due to non compliance of the permit there is potential for contamination at this site.

#### H1.5 Business Resource Centre, Tafarnaubach

In response to the Deposit Plan consultation, an objection was received to the allocation of the Business Resource Centre for housing. The objection sought the deletion of the site from the Plan. The deletion of this site was then advertised as an alternative site AS(D)03 (SD33a).

At this stage, 23 representations were received, all of which supported the deletion of the site from the Plan.

A number of issues were raised during the deposit plan consultation and through local members as to why the site was not suitable for housing. The Council has responded to each of these issues in SD07b (pages 175-183).

In addition to this, since the Deposit Plan was issued for consultation, there have been circumstantial changes relating to the allocation of this site for housing.

The site is currently occupied by a training centre and offices for the Council's regeneration division and is located on a primary industrial estate - Tafarnaubach Industrial Estate. There are long term plans to relocate the training centre hence the consideration of the site for housing development. At present no formal decision has been taken in terms of the relocation of the training facility. As the training facility forms an important aspect of the employment strategy for Blaenau Gwent it is considered that the site should be retained for this use.

In addition to this, the recently announced Enterprise Zone should provide employment opportunities and boost the local economy. Therefore, in the event that the training facility is relocated from this site then the land would still be required for employment use. Therefore the site should be retained for employment use.

A further issue identified in the representations received was regarding the loss of character of Tafarnaubach village. The site is currently located on an established industrial estate. The site is bordered to the north and east by the main access road into the industrial estate and to the south by new residential properties. The integration of housing and industry could lead to more sustainable lifestyles but design and location are important issues. There is a danger that the exponential growth of Tafarnaubach and Princetown villages could destroy any sense of community and result in a loss of character.

The Council consider that the site is inappropriate as a housing allocation and should be deleted from the Plan as reflected in SD10a, page 5, FC1.L).

It is also worth noting that the results of the Deposit Plan and Alternative Site consultation were reported to local members in November 2011 through a series of workshop meetings. The local members raised concerns regarding the development of Jesmondene Stadium and the Business Resource Centre. Copies of the minutes of these meetings are attached at Appendix 3.

Rebuttals to the Examination Statements received to the housing allocations are included at Appendix 2.

**4. Is there a need to identify any additional or alternative sites for housing and/or live-work activity? Are the alternative proposals put forward by other representers (for example, AS(N)17 – land at Tanglewood, Blaina; AS(N)18 – Ffoesmaen Road; and AS(N) 21 – Ty Pwdr) appropriate and deliverable? Have these sites been subject to sustainability appraisal compatible with that for the allocated sites in the Plan?**

**Is there a need to identify any additional or alternative sites for housing?**

No. The Council consider that there is no need to identify any additional or alternative sites for housing and/or live-work activity.

The Inspector's attention is directed to SD40 Housing Background Paper and SD41 Updated Housing Background Paper which sets out the housing land requirement figures. The Inspector's attention is also directed to the Council's Examination Statement for Hearing Session 2: Housing (ES2.5).

The allocation of sites for housing followed a robust and methodical assessment process to ensure that every allocated site is capable of development and can contribute to the delivery of the Strategy. The Inspector's attention is directed to SD30: Candidate Site Methodology Background Paper which sets out the assessment process in full and SD32a-f: Findings of the Candidate Site Assessment Process.

The promotion of live-work activity in the countryside is not considered a major issue worthy of inclusion in the Plan as Blaenau Gwent is not a rural area (ES9.1). However, the consideration of live-work units in the urban area will be dealt with through development management policies.

Notwithstanding this, it is considered that criterion (e) of policy SP8 Sustainable Economic Growth will serve to support the promotion of rural enterprise which includes such development as live-work units.

**Are the alternative proposals put forward by other representers (for example, AS(N)17 – land at Tanglewood, Blaina; AS(N)18 –**

**Ffoesmaen Road; and AS(N) 21 – Ty Pwdr) appropriate and deliverable?**

No. The Council consider that the alternative proposals put forward by other representors are not appropriate and deliverable.

**AS (N) 17 - Land at Tanglewood, Blaina**

The site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site Number C5). The results of this process is clearly set out in SD32d. The site was considered to be unsuitable for residential development on the grounds of visual impact; and development of the site would result in loss of open space, habitat and fragmentation of the ecological complex.

It is acknowledged that the development of this site would be an extension to the Tanglewood residential development. However, as concluded in the candidate site assessment process the visual impacts are significant at present, developing this site would make the visual impact worse.

The site is greenfield land of high biodiversity value and if developed for housing would impact on the quality and character of the landscape.

The site is located in the Northern Strategy Area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would therefore not support the delivery of the LDP. Attached at Appendix 1 are the results of the assessment of the sites against the Preferred Strategy and Sustainability Appraisal Objectives.

**AS(N)18 – Ffoesmaen Road**

The site was previously assessed and rejected under the candidate site assessment process (Candidate Site C11). The site was considered to be unsuitable for residential development on the grounds that the site is greenfield land of high biodiversity and landscape value.

However, the incorrect site boundary was submitted to the Council at the candidate site assessment stage therefore the representor has undertaken its own assessment of the site following the process in SD30 and an independent ecological assessment.

The Council have reviewed the assessments undertaken and reassessed the site. It remains the Council's view that the site is unsuitable for residential development on the grounds that the site is of biodiversity and landscape value.

Based on the ecological information available, the site supports a habitat mosaic with predominantly acid grassland and supports at least 8 species listed in the SINC criteria and therefore it is considered that the site qualifies

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## Tredegar

<b>Proposed Sites for LDP Deposit Plan</b>					
A21	Corporation Yard	20	57	77	12

The table above identifies the best performing housing sites in the Tredegar Area. The sites in yellow performed well against the assessment but have issues which mean they are not being taken forward. The sites in orange have been taken forward into the LDP but may not be allocated at the higher density figure or may now be listed as a housing commitment rather than an allocation.

**A21 – Corporation Yard:** This site now has planning permission and so is allocated as a housing commitment in the LDP.

**A45 – Jesmondene Stadium:** Part of the site, the brownfield area of land has been allocated for housing only.

**A19 – Waundeg Housing Site:** This site is subject to stock transfer and therefore there is uncertainty as to what will happen with the site.

**A22 – Land at Sirhowy:** There are instability problems and mine shafts that make the site unviable.

**A4 – Former Gas Holder Station:** Although it was agreed that this was a good site, it does have contamination issues and has not come forward in a good economic climate it is considered appropriate for the site to be not taken forward.

**A23 – Land adjacent to Bryn Rhosyn:** There are ground instability problems with this site that makes the site unviable.

**A11 – Tredegar Ambulance Station:** There is uncertainty as to whether the ambulance service will be closing this building – at present cannot confirm either way.

**A28 – Land at Cripps Avenue:** This site is subject to stock transfer and therefore there is uncertainty as to what will happen with the site.

**A12 – North side of Merthyr Road:** outline planning permission pending

**A13 – Land to the North of Bryn Rhosyn:** There are ground instability problems with this site

**A46 - Land South of Bevans Avenue:** It is difficult to envisage how access can be achieved at this site. There are 2 possible means of access to the site – Ashvale Football Club and the end of the cul-de-sac of Bevan Avenue. Ashvale Football Club – applicant has not

**A36 - Adj Chartist Way:**



## Upper Ebbw Fach Area

Proposed sites for LDP Deposit Plan					
C6	Garnfach School (based on mixed use allocation)	23	57	80	12
C22 & C32	NMC Factory				

<b>Sites taken out at stage 2 assessment</b>	
C1	Land at Upper Coed Cae, Nantyglo
C2	Land east of Pant View Houses, Coed Cae
C4	Croesyceiliog Farm
C9	Land adjacent to Gwaelodd-y-Gelli
C10	Former Bus Depot, Land west of A467, Blaina
C11	Ffoesmaen Road, Upper Coed Cae
C31	Land adjacent to Station Terrace, Nantyglo
C36	BEWA (UK) Ltd, Noble Square Industrial Estate
C37	Land at Twyn Blaenant, Blaenavon Road, Brynmawr
C38	Brynewelon, Nantyglo

The table above identifies the best performing housing sites in the Upper Ebbw Fach Area. The site in yellow performed well against the assessment but has issues which mean it is not being taken forward.

**C26 – Land at Pant View, Coed Cae:** This site is subject to stock transfer and therefore there is uncertainty as to what will happen with the site.

## Lower Ebbw Fach Area

Proposed Sites for Deposit LDP					
D13a	Six Bells Colliery Site	23	49	72	60
D23	Warm Turn	16	49	65	32
D25	Roseheyworth Comprehensive	16	45	61	33
D21	Former Mount Pleasant Court, Brynithel	16	45	61	18
D30	Quarry Adj to Cwm Farm Road	16	45	61	22
					<b>165</b>
D20	Hillcrest View	16	41	57	22
AS (N) 21	Ty Pwdr	8	39	47	
Sites taken out at stage 2 assessment					
D1	Ty Dan-y-Wal Road, West Bank, Cwmtillery				
D2	Former NCB Housing, Hafod-y-Coed				
D6	Land to the west of Lewis Street, Swffryd				
D7	South of Lewis Street, Swffryd				
D8	Argoed Farm, Aberbeeg				
D9	Quarry at the Gilfach Wen Farm, Six Bells				
D16	Brynhydrid Junior School				
D17	Former Tyr Graig Junior Mixed & Infants School				
D24	Rear of Farm Road				
D26	Greenmeadow Farm (UDP Allocation H2 (10))				
D27	Ty Pwdr / Greenmeadow Farm (UDP Allocation H2 (35))				
D29	Land to the east of Bournville Road, Blaina				

The table above identifies the best performing housing sites in Lower Ebbw Fach. The site highlighted in orange has been taken forward into the LDP because planning permission has been granted.

**D20 – Hillcrest View:** Planning permission has been granted.

## Rebuttal of Housing Allocations

Summary of Representer's Case	Council Response
<b>H1.1 Willowtown School</b>	
<b>Representer:</b> Unite the Union (60)	
<ul style="list-style-type: none"><li>• No demand or requirement for</li></ul>	

requirements"

"Stability analysis undertaken by Dr Noake suggest that the new earthworks profile are stable...however there is an error in the factors of safety quoted for the upper slopes...this means that the upper slopes do not comply with the long term factor of safety of 1.3".

"G.A. Spacey and Associates state in the conclusions to their report that the earthworks carried out on the site appear to be in an unstable condition, particularly the lower slope. They also recommend that appropriate works are undertaken to remediate the slope, involving regrading, recompaction and drainage measures".

## Rebuttal of Alternative Sites

Summary of Representor's Case	Council Response
AS (N) 17	

Summary of Representer's Case	Council Response
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- The Council's ecology report is flawed

- The site is not of sufficient importance to be designated as a SLA

- Assessment stages 4, 5 & 6 were not completed by BGCBC

- The representer seeks confirmation on whether a full ecological survey and assessment has been undertaken.

- The representer seeks an







## **APPENDIX 3**

### Minutes of Local Development Plan Meetings



**Local Development Plan Member Meeting  
Upper Ebbw Fach Area  
9.30am Tuesday 8<sup>th</sup> November 2011  
Executive Room, Civic Centre, Ebbw Vale**

**Attendees present**

Cllr S Ford  
Cllr J E Mason  
Cllr G Collier  
Cllr Y Lewis

Lynda Healy – Development Plans Manager  
Hayley Spender – Planning Policy Officer  
Brian Swain – Planning Policy Officer  
Eirlys Hallett– Head of Planning Control

**Apologies**

Cllr D. Wilcox  
Cllr K J Brown  
Cllr D L Elias  
Cllr J J Hopkins, Dip.Ed., Dip.,Dip. Sc., O.St.J

The Development Plans Manager welcomed the Members and Officers to the meeting which had been convened to:

- Outline the representations made on the Deposit Local Development Plan and on the 'Alternative Sites'
- Enable Members to voice concerns regarding the issues raised
- Explain the next steps

The Development Plans Manager gave a presentation, with the aid of slides (a copy of which was provided for Members) to provide an update on where we are in the LDP process, identify the main issues arising from the deposit plan consultation and outline proposed focussed changes to policies.

The Development Plans Manager and the Planning Policy Officer then gave a further presentation, with the aid of slides to outline the representations made on the Deposit Local Development Plan allocations and on the 'Alternative Sites'. This enabled Members to voice concerns regarding the comments raised.

**The Members approved every Officer Recommendation in relation to the allocations and alternative sites but made the following comments with regard to particular sites:**

**Nantyglo Ward**

H1.7 Garnfach School site

Cllr S Ford and Cllr J E Mason questioned why the site was not also allocated for a community use. The Development Plans Manager explained that at the time of preparing the Plan there was a significant amount of uncertainty around what community use was to be developed on the site. However the

Site Descriptions document which is a supporting document to the Plan does explain that part of the site is required for a community scheme.

**Recommendation**

**No change to the Officer Recommendation.**

**Brynmawr Ward**

H1.8 Crawshay House

**Local Development Plan Member Meeting  
Tredegar Area  
11.00 am Tuesday 8<sup>th</sup> November 2011  
Executive Room, Civic Centre, Ebbw Vale**

**Attendees present**

Cllr K Hayden

Cllr A Hobbs

Cllr S Thomas

Cllr H L Trollope

Cllr B G Willis



**Local Development Plan Member Meeting**  
**Lower Ebbw Fach Area**  
**12.3 0pm Wednesday 9**



**Local Development Plan Member Meeting  
Drop in Session  
9.30am – 12.30pm Friday 18<sup>th</sup> November 2011  
Executive Room, Civic Centre, Ebbw Vale**

**Ebbw Vale Session 9.30am – 10.00am**

No Members attended

Lynda Healy – Development Plans Manager  
Hayley Spender – Planning Policy Officer

**Tredegar Session 10.00am – 10.30am**

No Members attended

Lynda Healy – Development Plans Manager  
Hayley Spender – Planning Policy Officer

**Upper Ebbw Fach Session 10.30am – 11.30am**

**Attendees present**

Cllr M B Dally  
Cllr D L Elias

Lynda Healy – Development Plans Manager  
Hayley Spender – Planning Policy Officer

**Apologies**

Cllr J J Hopkins, Dip.Ed., Dip.,Dip. Sc., O.St.J

## **Nantyglo Ward**

### H1.7 Garnfach School site

Cllr M B Dally questioned why the site was not also allocated for a community use. The Development Plans Manager explained that at the time of preparing the Plan there was a significant amount of uncertainty around what community use was to be developed on the site. However the Site Descriptions document which is a supporting document to the Plan does explain that part of the site is required for a community scheme.

## **Recommendation**

**No change to the Officer Recommendation.**

## **Brynmawr Ward**

Cllr D L Elias proposed that an additional highway improvement should be included in the Plan. A one way system included Intermedia c Roade

## **Lower Ebbw Fach Session 11.30am – 12.30pm**

### **Attendees Present**

Cllr D Davies

Cllr D Hancock

Cllr WC Watkins

Lynda Healy – Development Plans Manager

Hayley Spender – Planning Policy Officer

The Development Plans Manager welcomed the Members and Officers to the meeting which had been convened to:

Outline the representations made on the Deposit Local Development Plan and on the 'Alternative Sites'

Enable Members to voice concerns regarding the issues raised

Explain the next steps

The Development Plans Manager provided an update on where we are in the LDP process, identified the main issues arising from the deposit plan consultation and outlined proposed focussed changes to policies.

The Development Plans Manager and the Planning Policy Officer outlined the representations made on the Deposit Local Development Plan allocations and on the 'Alternative Sites'. This enabled Members to voice concerns regarding the comments raised.

**The Members approved every Officer Recommendation in relation to the allocations and alternative sites. In particular, Cllr D Davies strongly supported the officer recommendation to not allocate land at Ty Pwdr (AS (N) 21) for housing.**

