

SESSION 19 CWMTILLERY SETTLEMENT BOUNDARIES

Introduction

This Statement has been prepared by Blaenau Gwent County Borough Council in order to help facilitate appropriate discussion at the Cwmtillery Settlement Boundaries Hearing Session. The Paper provides a response to the questions set by the Planning Inspector (Mr Vincent Maher).

Where the Council does not intend to provide any additional written evidence the Inspector's attention is directed to the relevant part of the Evidence Base, which in the view of the Council addresses the matters raised. The paper will not repeat evidence previously submitted for consideration.

The Council's detailed response to the representations received to the Cwmtillery settlement boundary are contained in the Report of Representations (SD07b).

Council Response to Inspector's Questions

within small groups of houses, or minor extensions to groups outside the settlement boundary.

AS (N) 21 - Ty Pwdr

1. 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 representors (for example AS (N) 21 – Ty Pwdr) appropriate and deliverable? Has this site 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 and/or live-work activity?

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 representors (for example 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.

The site was previously assessed

visually obtrusive in the landscape and would have a negative effect on the character and appearance of the area.

The representor has submitted an amended site boundary to that considered at the candidate site assessment stage. Therefore the representor has undertaken a sustainability appraisal, its own assessment of the site following the process in SD30.

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 high biodiversity and landscape value.

The development of this site for residential development would result in the loss of the majority of acid grassland within Ty Pwdr, which justifies SINC designation in its own right but also contributes significantly to the overall area of this habitat and other habitats within the Greenmeadow SINC and thus forming an integral ecological component of the wider area. Although the proposals are to develop a smaller area of the Ty Pwdr site it is highly likely that the impacts on the habitats and species, considered to be of high value for nature conservation will be high – habitats would be lost and fragmented. Therefore this site should not be developed for housing. A full Council response to the independent ecological assessment undertaken by the representor is set out in SD07b (pages 465 – 468).

A study undertaken by Bronwen Thomas (SD110) using the recognised LANDMAP assessment criteria classifies the site as being of high value and therefore included in the Cwmtillery Special Landscape Area. There are also visual impact concerns over the wider valley area.

The site is located in the Southern Strategy Area. The deposit LDP allocates sufficient land to deliver sustainable 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 strategy. Attached at Appendix 1 are the results of the assessment of the sites against the Preferred Strategy and Sustainability Appraisal Objectives.

Attached at Appendix 2 is the Council's rebuttal of the examination statement (ES19.1) submitted to AS (N) 21 – Ty Pwdr.

Has this site been subject to sustainability appraisal compatible with that for the allocated sites in the Plan?

The Council note that the representor of AS (N) 21 - Ty Pwdr has undertaken a sustainability appraisal of the site.

However, the Council would not agree that the sustainability appraisal is compatible with that for the allocated sites in the Plan. The Council note this is a very subjective assessment but do not consider that the representors have made realistic assumptions when assessing the sites. The Council's

assessments are based on the views received from the expert assessments. The representors' assessments fail to acknowledge biodiversity and landscape issues that are clearly known constraints for these sites.

The Council has undertaken its own sustainability appraisal of the alternative sites which is comparable to that done for the allocated sites. The results of which are included as an appendix to this statement. It should be drawn to the Inspectors attention that when comparing the alternative sites, the sites performed are less sustainable than the allocated sites.

Tredegar

Proposed Sites for LDP Deposit Plan					
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				

Sites taken out at stage 2 assessment	
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	Brynawelon, 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

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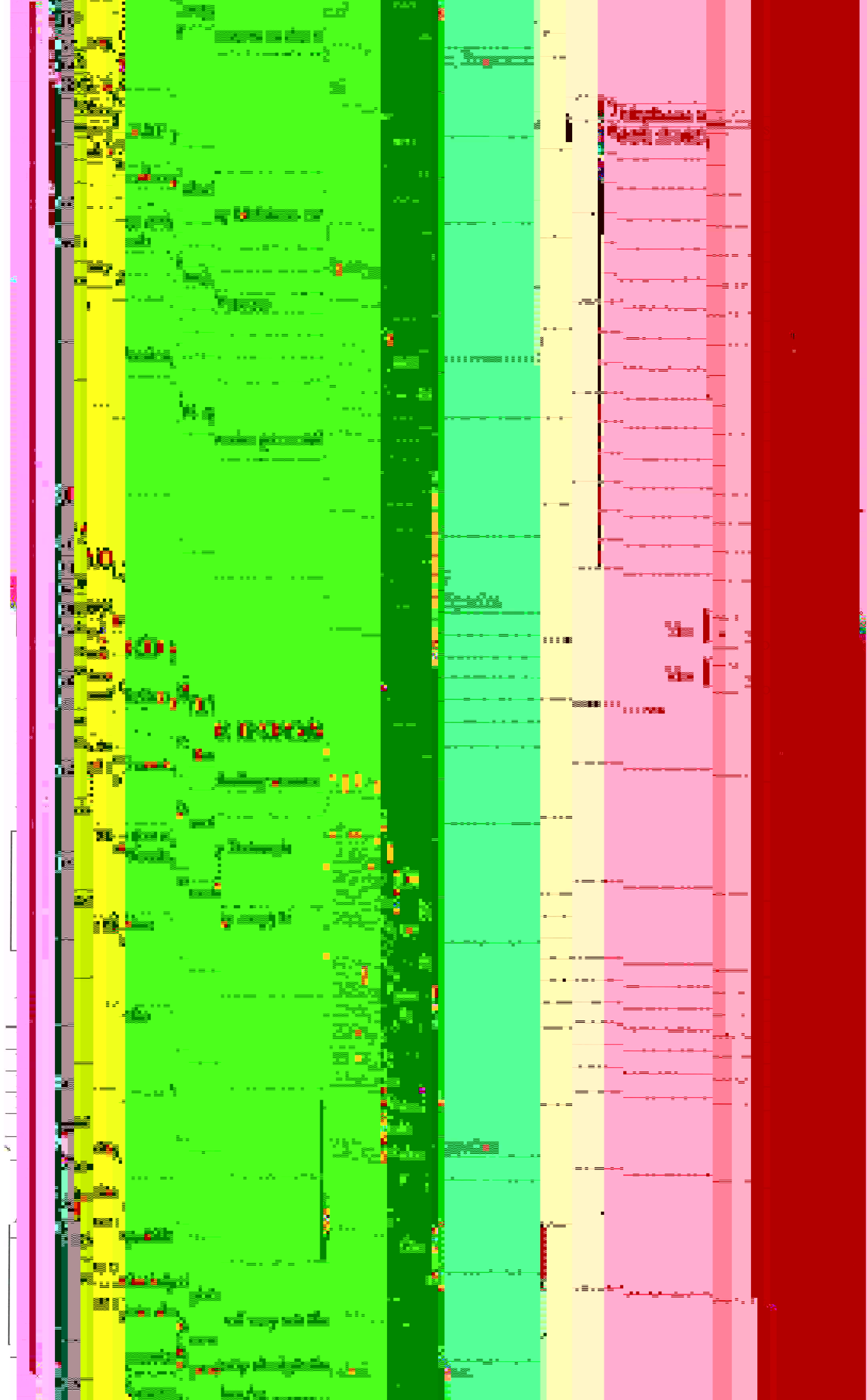
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