



Blaneau Gwent Local Development Plan Examination – Response to Hearing Matters

Referring to Housing Matters 2, 3, and 6 and
Housing Sites Matter 1 and 4

Prepared on behalf of

Questedge Ltd

June 2012

DTZ
1 Colmore Square
Birmingham
B4 6AJ

Contents

1	Summary Position	3
2	Issues Highlighted by the Inspector	5
3	Response to Matters - Housing Matter 2, 3 and 6	7
4	Response to Matters - Housing Sites Matter 1	8
5	Response to Matters – Housing Sites Matter 4	10
6	Tests of Soundness	14
7	How the Core Strategy can be made Sound	15

Appendices

Appendix 1 – Site Location Plan

Appendix 2 – Visual Impact Analysis

Appendix 3 –Reserved matters relating to the phased residential development, associated landscape and external works was approved in December 1998 (application reference. 1998/0324) of the Outline planning application for the residential development of Cwm Farm was approved in April 1997 (application reference. 1997/0232) – Approved Layout Plans

Appendix 4 - Ecological Appraisal Site Constraints Plan

Appendix 5 – Illustrative Layout Plan

1 Summary Position

- 1.1 Blaneau Gwent District Council does not agree that the objection Questedge makes the Core Strategy unsound and does not accept the identified site as a housing allocation.
- 1.2 For the reasons outlined in this Report, Questedge maintain that the Core Strategy is unsound and recommends changes to rectify this in the next sections of this submission.

Site Description

- 1.3 The site lies on the western slopes of Mynydd James, on the eastern edge of Blaina in the Ebbw Fach valley, approximately 3 km south of Brynmawr and 5 km north of Abertillery, and extends to approximately 1.75 ha (4.3 acres).
- 1.4 The site is bounded to the north by new residential development which was granted in outline in 1997. The outline layout plan submitted with this application includes (within its blue line boundary of ownership) the site subject of these representations, although residential development was not proposed as part of the layout.
- 1.5 Other boundaries to the site are a remnant hedge bank at the eastern boundary, a dilapidated stone wall behind which is a stock proof fence to the south, and stock proof fence at the north-western with deciduous woodland beyond, and open grassland to the south-west. At the northern end is a stream and small area of impounded drainage. There are no trees within the site but a single sycamore on the eastern boundary.
- 1.6 The site slopes from east to west and is currently used as a paddock for horses, and construction storage with two metal storage containers accessed from the adjacent residential development.

Summary of Representations

- 1.7 The site has been put forward as a for residential land allocation to support the growth of Blaina.
- 1.8 Residential development could provide around 40 dwellings (assuming a density of 20 – 30 dwellings per ha), broadly following the adjacent residential development (which provides a residential density of approximately 20 dwellings per ha), with consideration given to a final site boundary against the surrounding hillside. Two indicative layout options are provided as an Appendix to this Statement to illustrate the range of additional dwellings that could be delivered, using existing access points from the residential development at Tanglewood. These show how a high quality development could be accommodated within the site boundary to complement the existing residential development and provide a considered boundary to the developed area. These drawings are for illustration purposes only and would be revised subject to detailed analysis of visual impact, technical capacity, and layout to accommodate and maintain views. They show the range of units which could be delivered.

Planning History to the Adjoining Site

- 1.9 Whilst the site has not been subject to any residential application/reserved matters, it was included within the boundary of the Cwm Farm outline which has been developed adjacent. This planning history is outlined below (related plans are attached as appendices):
 - Outline planning application for the residential development of Cwm Farm was approved in April 1997 (application reference. 1997/0232).
 - Reserved matters relating to the phased residential development, associated landscape and external works was approved in December 1998 (application reference. 1998/0324).
 - Application for the retention of dwellings at Oak Road was approved in December 2001 (application reference 2001/0364) – adjacent development.
 - Application for the siting of 17 dwellings at Glyn Milwr (principle established by the outline) was approved in May 2002 (application reference 2002/0097) – adjacent development.

- Application to construct 36 houses on land at Glyn Milwr (principle established by the outline) was approved in August 2006 (application ref. 2006/0151) – adjacent development.

2 Issues Highlighted by the Inspector

- 2.1 Several of the issues raised by the Inspector are pertinent to Questedge's representations. These are set out in relation to relevant Hearing Sessions below:

Housing Matter 1 - What evidence underpins the case for the Plan's proposed housing target and phasing in the light of recent construction rates, population movements, national guidance and policy? Does the Council's current target represent a realistic and soundly based target or is it an aspirational figure?

- 2.2 Questedge accept the Council's proposed housing target but does not consider the allocation of these target numbers across the identified regions appropriately reflect the need to support growth within the range of settlements, or has realistically considered appropriate alternatives to secure delivery.

Housing Matter 2 - How do the figures in the proposed site allocations match the various figures in Policies SP4 and SP5?

- 2.3 Questedge accept the broad strategy which allocates housing numbers to Ebbw Vale, Tredegar, Upper Ebbw Fach and Lower Ebbw Fach (Policy SP5) but does not consider the site allocations within these regions allow flexibility, are distributed to allow for appropriate growth to support each centre (e.g. no new allocation in Blaina) or provide appropriate consideration of alternative sites which are appropriate and deliverable (e.g. land at Tanglewood).

Housing Matter 3 - To what extent will the amount of new housing anticipated rely on windfall development?

- 2.4 Questedge recognise the allocations provided (Policy SP5) but consider it important that the allocations identified provide flexibility to ensure they are viable and deliverable and guarantee the delivery of housing in appropriate areas to meet identified targets.

Housing Matter 6 - Should the Council's target for new housing be higher? If not, why not? Should the target be lower? If not, why not?

- 2.5 Questedge accept the council's housing target based on need (Policy SP4) but maintain this should allow for flexibility to deliver viable high quality housing development to support appropriate settlements and that allocated sites should therefore be distributed accordingly.

Housing Sites Matter 1 - Is the allocation of housing sites based on a sound process of sustainability appraisal including testing of reasonable alternatives and does it represent the most appropriate strategy in the circumstances?

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

- 2.6 Questedge do not consider the allocation of housing sites has followed a sound process giving appropriate consideration to sustainability appraisals and other technical information submitted, individual site characteristics, local circumstance, the need to support the regeneration of identified settlements, and to identify viable sites where infrastructure is in place to secure housing delivery (e.g. land at Tanglewood).

- 2.7 The Candidate Site Assessment process and Site Allocations Consultation have not appropriately considered viable alternatives (e.g. land at Tanglewood) in light of the information submitted. The evidence base is not robust and fails to adequately account for specific site characteristics.

Housing Sites Matter 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?

- 2.8 Questedge consider there is a need to identify additional sites for housing to ensure the Plan is reasonably flexible to deal with changing circumstance and secure provision of housing development to support the identified settlements (e.g. Blaina). The evidence that has been put forward by Questedge to support the allocation of land at Tanglewood confirms an appropriate and deliverable site, supported by appropriate Sustainability Appraisal, Biodiversity Appraisal and Landscape and Visual Impact Assessment to confirm suitability for residential development.

3 Response to Matters - Housing Matter 2, 3 and 6

Housing Matter 2 –

How do the figures in the proposed site allocations match the various figures in Policies SP4 and SP5?

Housing Matter 3 –

To what extent will the amount of new housing anticipated rely on windfall development?

Housing Matter 6 –

Should the Council's target for new housing be higher? If not, why not? Should the target be lower? If not, why not?

- 3.1 The LDP makes provision for 3,500 new dwellings (ref. FC1.B document SD10a) including 438 within the Upper Ebbw Fach region, made up of 248 dwellings from identified land allocations (of which none are in Blaina), and 190 from existing commitments (including the Cwm Farm site).
- 3.2 The distribution of these dwellings (Policy H1) does not provide for any residential growth in Blaina over the plan period. None of the identified residential land allocations for the Upper Ebbw Fach region are in Blaina. Policy H1 provides for housing delivery in the town to be met solely from the existing commitment.
- 3.3 The existing commitment at Cwm Farm (ref. HC1.27, adjacent to the site) is the only identified source of new housing in Blaina over the plan period, to deliver 78 units over 9.01 ha. This development site is now largely delivered and the final phase is being completed. The Plan as submitted does not allocate any additional years supply to be delivered to support the town.
- 3.4 Questedge do not consider this to be a sound approach, as it fails to provide for any new housing growth in Blaina over the plan period. It does not allow for any flexibility for delivery on viable and sustainable sites elsewhere in the event that other committed sites within the Upper Ebbw Fach do not come forward as anticipated. Failing to make any allowance for additional housing growth in Blaina over the Plan period will undermine the regeneration of the town centre. The majority of the identified commitment and permitted development at Cwm Farm has been completed and the final phase is currently under construction.

4 Response to Matters - Housing Sites Matter 1

Housing Sites Matter 1 –

Is the allocation of housing sites based on a sound process of sustainability appraisal including testing of reasonable alternatives and does it represent the most appropriate strategy in the circumstances?

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

- 4.1 The land at Tanglewood, Blaina was put forward by Questedge as part of the Candidate Site Selection Process, supported by a Sustainability Report, Landscape and Visual Impact Report, and Ecological Appraisal to confirm suitability of the site for residential redevelopment.
- 4.2 The site satisfied the Initial Planning Assessment required under Stage 1 and was considered acceptable by Highways and Environmental Health under the Stage 2 Expert Assessment. Under the same Stage 2 assessment the site was considered unacceptable by Biodiversity and Countryside and Landscape, but acceptable for further consideration and put forward to Stage 3.
- 4.3 During Stage 3, comments were received from Welsh Water, Environment Agency Wales, the Coal Authority and Glamorgan-Gwent Archaeological Trust and the site was put forward to Stage 4 (final stage before draft LDP).
- 4.4 At this stage the local authority considered the site to be incompatible with the LDP Preferred Strategy and LDP Sustainability Objectives and the site was disregarded as a potential residential allocation.
- 4.5 The site was rejected on the basis of incompatibility with the LDP Sustainability Objectives 12, 17 and 25 and LDP Preferred Strategy 12.
- 4.6 Questedge dispute this assessment and consider this process unsound as it is not founded on a credible evidence base. Given the conclusions of the supporting assessments provided, land at Tanglewood should be considered a reasonable alternative.
- 4.7 The objectives identified are provided below and we make comments relating to each:
 - LDP Sustainability Objective 12 – To protect and enhance biodiversity across Blaneau Gwent
 - LDP Sustainability Objective 17 – To conserve soil resources and their quality
 - LDP Sustainability Objective 25 – To protect the quality and character of the landscape and enhance where necessary
 - LDP Preferred Strategy 12 – To protect, enhance and manage the diversity of the biodiversity resource of Blaneau Gwent through the identification of ecological corridors

Biodiversity

- 4.8 The Biodiversity Appraisal which was submitted in support of the application identifies mitigation measures to manage any biodiversity impact of development.
- 4.9 It concludes a residential development would result in the '*loss of an area of species-poor semi-improved acid and marshy grassland of limited value to species of nature conservation concern*' only.
- 4.10 The Appraisal gives consideration to investment into the site which could be secured as part of its redevelopment to protect a small strip of acid grassland which would act as buffer zone and if used in this was '*could increase in nature conservation value*' over time. The Site Constraints Plan prepared to illustrate the findings of the Ecological Appraisal is provided as an Appendix to this Statement.
- 4.11 Questedge do not agree the site should be scored in conflict with the biodiversity criteria.
- 4.12 The site is confirmed within the Biodiversity Appraisal as being species-poor and of limited value to nature conservation. Mitigation could increase the ecological value of parts of the site.

Soil Resources

- 4.13 Questedge dispute the local authorities observation that the allocation would result in the loss of any valuable soil resource. The site is currently used as paddock land and is not used as high quality grazing/arable farming land.

Quality and character of the landscape

- 4.14 Questedge do not agree that the allocation of the site would be in conflict with the LDP objective to protect the quality and character of local landscape. The assessments submitted at Site Selection stage confirm the current site does not add any value to ecology or biodiversity. A good quality design could enhance the character of the landscape.

Protecting and Managing the biodiversity resource

- 4.15 The Biodiversity Appraisal submitted at the Candidate Site Assessment stage does not identify any significant value in the biodiversity resource on site, and as such Questedge do not agree that the protection or enhancement of biodiversity should prejudice a residential allocation.

5 Response to Matters – Housing Sites Matter 4

Housing Sites Matter 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?

- 5.1 The LDP makes no provision for new residential land allocations in Blaina (ref. Policy H1 or document SD01) and is reliant on the existing commitment of 190 new dwellings at the Cwm Farm site, immediately adjacent to the subject land at Tanglewood, to provide necessary growth to support Blaina.
- 5.2 Policy H1 fails to make any allowance for additional housing growth in Blaina other than that committed. Questedge do not consider this a sound approach as it fails to meet Test CE4 or Test CE4. There is no flexibility to deal with change in the existing circumstance, in the event that other committed sites elsewhere do not come forward, or to allow for additional housing growth in Blaina over the Plan period. The allocations have not appropriately considered relevant alternatives.
- 5.3 The housing commitment at Cwm Farm is nearly complete and lack of other viable and allocated residential sites will undermine the regeneration of the town centre (ref. document SD37).
- 5.4 For this reason, Questedge consider additional/alternative sites should be included in the plan for residential development.
- 5.5 Land at Tanglewood, Blaina is an appropriate site which would have clear links to the existing residential development at Cwm Farm. It is a deliverable site in single ownership which is supported by necessary Sustainability Appraisal and technical reports (Ecological Appraisal and Landscape and Visual Impact Report) to demonstrate suitability.

Response to Alternative Sites Consultation (2011)

- 5.6 The site was included in the Alternative Site Register published July 2011 as a proposed new site for residential development. The following issues were raised:
 - Planning – question the need for further housing allocations, that the allocation would undermine the LDP strategy.
 - Highways – increased traffic, noise and pollution, additional strain on road surfaces, road congestion.
 - Countryside and Landscape – site is within the SLA, is the last existent green buffer between Tanglewood and East Pentwyn.
 - Biodiversity – impact on wildlife.
 - Other issues – Blaina town centre is in decline, pressure on local infrastructure, loss of privacy, tip located above the site, water run-off from the mountain, steepness of the site.
- 5.7 Following consultation the local authority considered the site unsuitable for residential land allocation. Questedge dispute this assessment and consider this process unsound as it is not founded on a credible evidence base.

- 5.8 We make the following comments to the issues raised by relevant representations:

Planning

- 5.9 The LDP land allocations provided to meet the target provision of 3,500 new dwellings are outlined at Policy H1 of document SD01. No new allocations are identified in Blaina. The only existing commitment in Blaina is the land at Cwm Farm (ref. HC1.27 of document S02a) which is nearly complete.
- 5.10 Questedge do not consider the allocations meet either test CE2 or CE 4 of soundness. There are no allocations at all to deliver new housing in Blaina during the Plan period and no allowance for flexibility in housing delivery outside those committed.
- 5.11 This situation is unrealistic and unsound and will undermine the regeneration of the town centre (ref. document SD37) as it does not allow for additional population to support the existing centre. Failing to make any allowance for additional housing growth in Blaina over the Plan period will severely restrict the potential of the settlement to contribute to the economy, population and community of the Upper Ebbw Fach region.
- 5.12 The lack of suitable brownfield sites and the valley topography of the Upper Ebbw Fach region mean other potential housing allocations which would be suitable, sustainable and viable are limited.
- 5.13 Questedge put the subject site forward during the Candidate Site Assessment process and the local authority at this stage confirmed the site satisfied their initial Planning Assessment (ref. document SD32a and SD32d).

Highways

- 5.14 Highways assessment was made by the local authority during the Candidate Site Assessment process which concludes *'apart from the existing access needing improvement, the site and the surrounding area has a good highway infrastructure'* (ref. document SD32d).
- 5.15 At this stage the site was considered acceptable on highways grounds by the local authority (ref. document SD32d).

Countryside and Landscape

- 5.16 A Landscape and Visual Impact Report was prepared by White Young Green which concludes that although the potential adverse landscape and visual effects of the proposed development are of significance in respect to the SLA designation, *'with due regard given to the overall scheme design and the integration of landscape proposals these effects may be mitigated to the extent of demonstrating respect for their setting and therefore not detrimental to the features or qualities of the Special Landscape Area'*.
- 5.17 This report was submitted to the local authority at the Candidate Site Assessment stage.
- 5.18 The local authority undertook a Countryside and Landscape Assessment at the Candidate Site Assessment stage which identifies trees on site but considers the site is acceptable.
- 5.19 The site falls within the Special Landscape Area, where development would be expected to conform to the highest standards of design, siting, layout and materials appropriate to the character of the area (ref. Policy ENV2 of document SD01). This is a design issue for consideration at an application stage. The adjacent development at Cwm Farm illustrates how these high standards can be achieved in this area.
- 5.20 Special Landscape Areas are identified using Countryside Council for Wales LANDMAP methodology - including prominence; spectacle – dramatic topography and views; unspoilt areas - pre-industrial patterns of land use; remoteness and tranquillity; vulnerability and sensitivity to change; locally rare landscape; and special landscapes.
- 5.21 The site is not located within an unspoilt or remote area, but immediately adjacent to an existing and established settlement and residential development which extends further north on the hillside. We do not consider the immediate location to be particularly vulnerable or sensitive to change. The Cwm

Farm site immediately adjacent to the subject site has been subject to residential redevelopment following outline permission in 1998 which is nearing completion. The local area has successfully adapted to this change. The site makes up a small part of the Mynydd James hillside but is not a rare site landscape locally and the Ecological Appraisal confirms this.

5.22 Additional visual impact assessment is included as an Appendix to this Statement.

Biodiversity

5.23 An Ecological Appraisal was prepared by Cresswell Associates in 2008 and was submitted to the local authority at the Candidate Site Assessment stage. This report found the majority of the habitats and features within the subject site to be of '*limited value to nature conservation*'.

5.24 It considers the proposed residential development of the site would be likely to result in a '*loss of an area of species-poor semi-improved acid and marshy grassland of limited value to species of nature conservation concern*'.

5.25 The report identified the following:

- Small area of acid grassland – the most important habitat recorded, but given the size of the area on site, and its proximity to a much larger and more diverse area of acid grassland to likely be only of local value to nature conservation.
- Dry-stone wall and the stone and earth bank - likely to be of value to common reptile species, common amphibian species and potentially to a range of invertebrate species. This feature is likely to be of local importance to nature conservation.
- Small Sycamore tree - may be of value to roosting bats, however, as an immature tree which is a non-native, invasive species; the tree is of negligible value to nature conservation if bats are found not to be present.

5.26 The potential loss of the small sycamore tree (which may result in an impact upon roosting bats) and the potential loss of less grazed habitats to the edge of the site and the dry-stone wall (which could impact upon common reptile species) would be considered at an outline application stage where appropriate mitigation would be identified and agreed.

5.27 Questedge do not consider these conclusions critical to stop recognition of the site as a housing allocation to meet other objectives. The Site Constraints Plan which was provided with the Ecological Appraisal is attached at Appendix 4.

5.28 In any event, the Appraisal identifies general recommendations which could be used to inform the design of any residential development, and would ensure identified biodiversity could be protected and appropriate mitigation taken to limit the impact of any scheme. Potential mitigation could include:

- Landscaping with a mixture of locally-native trees and shrubs
- Protecting the narrow strip of acid grassland located along the southern boundary of the site to act as buffer zone
- Confirming the presence of any roosting bats in the small sycamore tree and obtaining any licence/watching brief necessary
- Maintaining any features confirmed as of potential value to reptiles and creating new areas within any development where possible.

5.29 None of these measures should prejudice the site for a successful residential development.

5.30 Biodiversity was considered during the Candidate Site Assessment process. At this stage the site was considered acceptable by the local authority.

Other Issues - Town Centre

- 5.31 Questedge acknowledge that Blaina town centre has suffered decline in recent years. Nantyglo and Blaina have been identified previously as Communities First areas as a result of their high levels of deprivation.
- 5.32 The Upper Ebbw Fach Regeneration Plan 2009-2012 (ref. document SD37) identifies specific projects to encourage the regeneration of Blaina town centre and support the wider aims of the LDP.
- 5.33 It is Questedge view that the redevelopment of land at Tanglewood would provide housing choice to slow out-migration and protect the viability and vitality of Blaina within the region and support it's regeneration.

Other issues - Education

- 5.34 Education provision for Blaina is provided by is Ystruth Primary School located at Southlands, 548m walk from site. The school provides education for pupils between 3 and 11 years and within the most recent Blaenau Gwent Single Education Plan (2008) was confirmed as having a surplus capacity for 41 pupils.
- 5.35 Questedge consider it important to maintain sustainable growth in pupil numbers within the local catchment to support this school.
- 5.36 The Children and Young People's Plan for Blaenau Gwent (2011 – 2014) does not update capacity but includes Core Aim 2 – to provide a comprehensive range of education and learning opportunities. Maintaining pupil numbers at Ystruth Primary School will help meet this aim within Blaina where other primary schools have been closed.

Other Issues - Privacy

- 5.37 Privacy would be a matter to be dealt with at a detailed design stage. A high quality design of development would ensure local privacy would be maintained, and that any new residential dwellings were provided within a well-designed development. The existing residential development at Tanglewood Drive and Glyn Milwr demonstrates how a high quality design could be achieved in this location.
- 5.38 Questedge do not consider this to be a matter for the Local Development Plan, or relevant to the tests of soundness.

Other issues - Water run-off

- 5.39 Water run- off has previously been considered in relation to the development of land at Glyn Milwr and the remainder of the Cwm Farm site. At this time the Council's drainage engineer was satisfied with a Grampian condition to agree drainage prior to commencement of development.
- 5.40 Questedge consider the run-off issues to be similar to those of the neighbouring site, and that appropriate mitigation could be agreed at a detailed design stage.

6 Tests of Soundness

- 6.1 The relevant tests of soundness are Test CE2 – being realistic and appropriate with a robust and credible evidence base, and Test CE4 – being reasonably flexible to deal with changing circumstance. These tests are considered in turn below.

Test CE2 - The strategy, policies and allocations are not realistic and appropriate having considered the relevant alternative and/or are not founded on a robust and credible evidence base.

- 6.2 Questedge do not agree the local authority has undertaken a sound review of the potential conformity of the site for potential allocation.

Candidate Site Assessment Process

- 6.3 The site at Tanglewood was found to be 'in conformity' with 13 (52%) of the LDP Sustainability Objectives, 'in conflict' with 4 (16%), and 'possibly in conflict' with 2 (8%). 6 (24%) were deemed not relevant.
- 6.4 Comparably, the site was found to be 'in conformity' with 5 (36%) of the LDP Preferred Strategy objectives, and 'in conflict' with only 1 (7%). The site was found to be 'possibly in conflict' with 1 (7%) and 5 (36%) were not relevant.
- 6.5 In addition to those identified, Questedge consider the site should also have been judged 'in conformity' with the following criteria for the reasons outlined:
- LDP Sustainability Objective 1 to promote economic growth and strengthen and diversify the economy - Residential allocation of the site would secure residential dwellings within the local area to support the growth and regeneration of the town centre.
 - LDP Sustainability Objective 9 to improve accessibility to education, leisure, employment, health, homes and community services for all sectors of the community – Residential development would provide residential development in an accessible area with good access to local services and infrastructure, and maintain their viability in accordance with the objectives set out in the education strategy.
 - LDP Preferred Strategy 2 to create a network of vibrant district/local centres (secondary hubs) well linked to the main hub of Ebbw Vale that provide a range of local services and facilities for the local community – Residential development would support the growth and regeneration of Blaina as a local centre within the Upper Ebbw Fach region, and consequently the role of this region in supporting Ebbw Vale.

Council Analysis of Site Allocations Consultation

- 6.6 The local authority assessment of the Site Allocations Consultation considers the site unsuitable for residential development on the grounds of visual impact, loss of open space, habitat and fragmentation of the ecological complex.
- 6.7 Questedge do not consider this view to be based on a credible evidence base, or balanced against the potential positive benefits of development. No significant biodiversity value was identified as a result of the Ecological Appraisal, which has been undertaken by a qualified ecological consultant. The report does not conclude development of the site would lead to fragmentation of any existing '*ecological complex*' or the loss of any significant habitat. Equally, the Landscape and Visual Impact Report does not find the potential impact to be damaging and suggests the design and layout of a scheme could be such to respect the setting and not be detrimental to the features or qualities of the Special Landscape Area.

Test CE4 - It is not reasonably flexible to enable it to deal with changing circumstances.

- 6.8 Questedge do not consider the current land allocations provide the flexibility necessary to deal with changing circumstances. The LDP and Upper Ebbw Fach Holistic Area Regeneration Plan 2009-2012 provide for the regeneration of Blaina within the Upper Ebbw Fach area, but the LDP makes no new housing allocations to provide the development and population necessary to support this.

Planning Policy Wales Edition 4 (February 2011)

- 6.9 Planning Policy Wales (PPW) states clearly that Local Development Plans should *'give developers and the public certainty about the type of development that will be permitted at a given location'* (paragraph 2.1.7).
- 6.10 PPW reiterates the Assembly Government's approach, set out in the National Housing Strategy to:
- provide more housing of the right type and offer more choice;
 - improve homes and communities, including the energy efficiency of new and existing homes; and
 - improve housing-related services and support, particularly for vulnerable people and people from minority groups (paragraph 9.1.1).
- 6.11 Local Planning Authorities should promote resource-efficient settlement patterns of development that minimise land-take and urban sprawl. It states the objectives for sustainable development; *'enhancing the economic, social and environmental well-being of people and communities, and achieving a better quality of life for our own and future generations in ways which promote social justice and equality of opportunity, and enhance the natural and cultural environment and respect its limits'*.
- 6.12 Emphasis is placed on the need for development to be located to *'minimise the demand for travel, especially by private car'* (paragraph 4.6) and it states that local Authorities should *'ensure that all local communities - both urban and rural - have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate, in safe neighbourhoods'* (paragraph 4.10.11).
- 6.13 The priorities identified for urban and rural areas include to *'secure environmentally-sound and socially inclusive regeneration in urban areas that require it so that they become more desirable places in which to live and work'* (para. 4.5.1). Through the Sustainable Settlement Strategy identified within PPW, local authorities should *'secure a sustainable settlement pattern which meets the needs of the economy, the environment and health, while respecting local diversity and protecting the character and cultural identity of communities'* (paragraph 4.6.1)
- 6.14 To achieve this they should promote sustainable patterns of development, and maintain and improve the vitality, attractiveness and viability of town, district, local and village centres, and as part of this *'foster development approaches that recognise the mutual dependence between town and country, thus improving linkages between urban areas and their rural surroundings'*, and *'locate development so that it can be well serviced by existing infrastructure'* (paragraph 4.6.2)
- 6.15 PPW identifies that there is need to make maximum use of vacant urban land for housing, in so doing it is necessary to distinguish between sites that need to be retained for recreation, amenity or nature conservation purposes and those that are genuinely suitable for housing development. Identifying sites for housing should follow a search sequence with settlement extensions considered after previously developed land (paragraph 9.2.8).
- 6.16 The site meets the objectives outlined within PPW. It is located immediately adjacent to the existing settlement and would make a logical extension to the settlement boundary, allowing the housing supply in Blaina to increase in a sustainable manner. The site could be used to increase the supply of new housing, and hence the regeneration within Blaina and the wider Blaenau Gwent County.

7 How the Core Strategy can be made Sound

- 7.1 The Core Strategy can be made sound by the inclusion of land at Tanglewood, Blaina as a residential allocation to provide new housing to contribute towards the target provision of 3,500 new homes across Blaneau Gwent and support the wider aims of the LDP to locate development in sustainable locations. It will reduce the need for reliance on windfall sites which may be less suitable.

Appendix 1 – Site Location Plan



Ordnance Survey © Crown Copyright 2012. All rights reserved.
 Licence number 100020449. Plotted Scale - 1:2500

Appendix 2 – Visual Impact Analysis

Note:

Red site boundary identifies the site subject of this submission

Red arrow identifies the site location where site cannot be seen



View of the site from Southlands – illustrates limited visual impact



View from Southlands – The site is not visible from the road and concealed by woodland



View at pathway from the East Pentwyn Estate – showing the existing visual impact of development



View at pathway from the East Pentwyn Estate – showing the existing visual impact of development



View at pathway from East Pentwyn Estate – showing the existing visual impact of development



View of Ystruth Primary School and Ty Celyn from East Pentwyn Estate – showing existing visual impact



View of existing development at East Pentwyn Estate – showing existing visual impact



View from pathway from East Pentwyn Estate – The site is not visible due to bank and woodland



View from pathway from East Pentwyn Estate – The site is not visible and concealed by bank and woodland



View of Glyn Milwr and Tanglewood Drive – Showing high quality design which respects the landscape

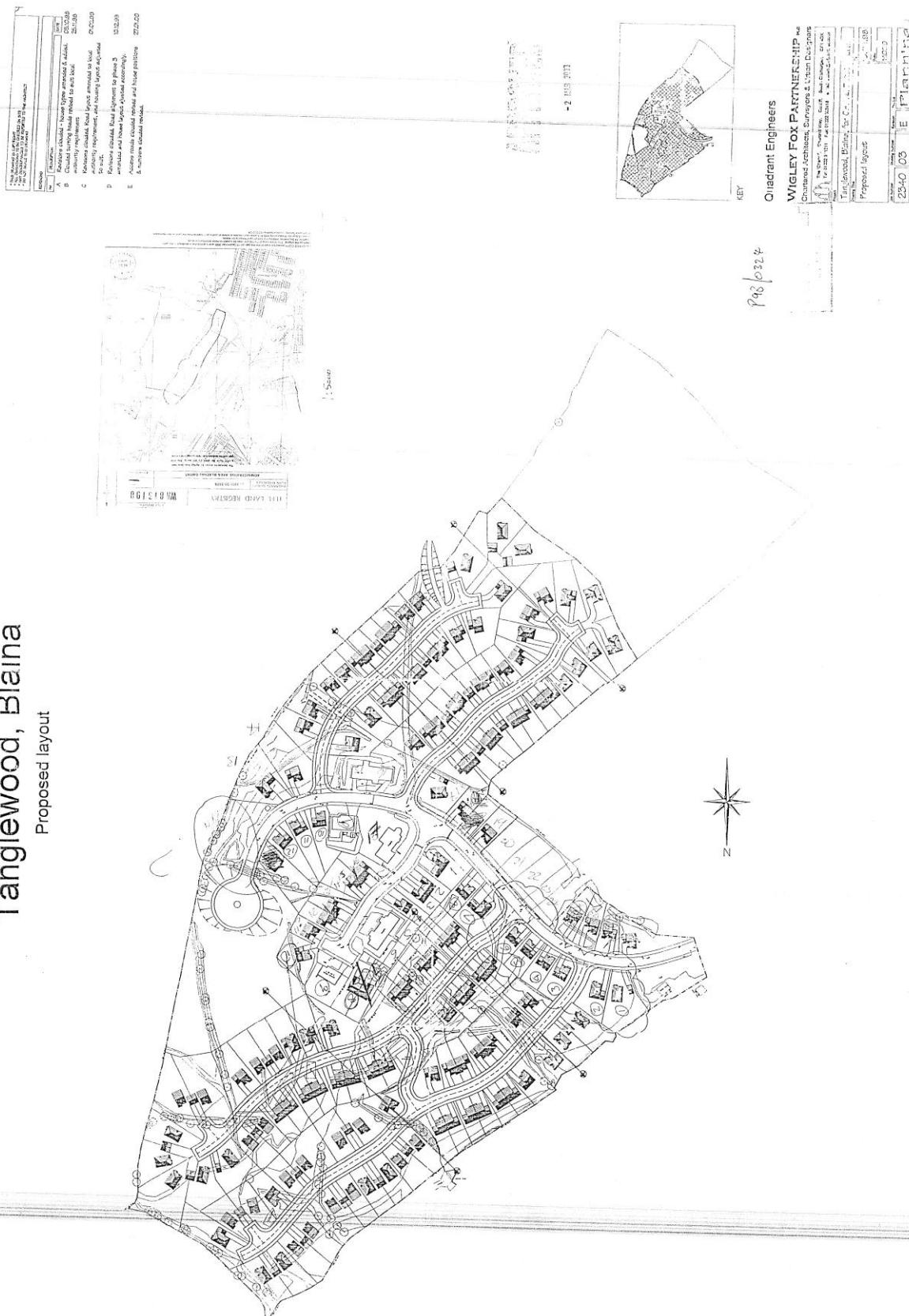


View of the site access from existing development at Glyn Milwr – illustrating a logical extension



View of existing development at Tanglewood Drive – Showing existing dwellings above the site area and no additional visual impact from development of the site subject to this Statement

Appendix 3 –Reserved matters relating to the phased residential development, associated landscape and external works was approved in December 1998 (application reference. 1998/0324) of the Outline planning application for the residential development of Cwm Farm was approved in April 1997 (application reference. 1997/0232).



Tanglewood, Blaina

Proposed layout

Schedule of Accommodation :- Phases 1, 2 & 3

	Area	Number	%
T1 Tanglewood 1	902 sq ft	32	56
T2 Tanglewood 2	902 sq ft	26	30%
T3 Tanglewood 3	902 sq ft	27	61
T4 Tanglewood 4	902 sq ft	34	40%
T5 Tanglewood 5	1095 sq ft	15	30
T6 Tanglewood 6	1095 sq ft	15	19%
T7 Tanglewood 7	984 sq ft	1	5
T8 Tanglewood 8	984 sq ft	4	5%
Total =			154

NB:-
Layout plan has been overlaid on existing site survey
See drawings 04, 05 & 06 for layouts of phases,
and locations of house types



1. The proposed development is shown in the following table:

Phase	House Type	Number	Area (sq ft)
A	Detached	32	902
B	Detached	26	902
C	Detached	27	902
D	Detached	34	902
E	Detached	15	1095
F	Detached	15	1095
G	Detached	1	984
H	Detached	4	984



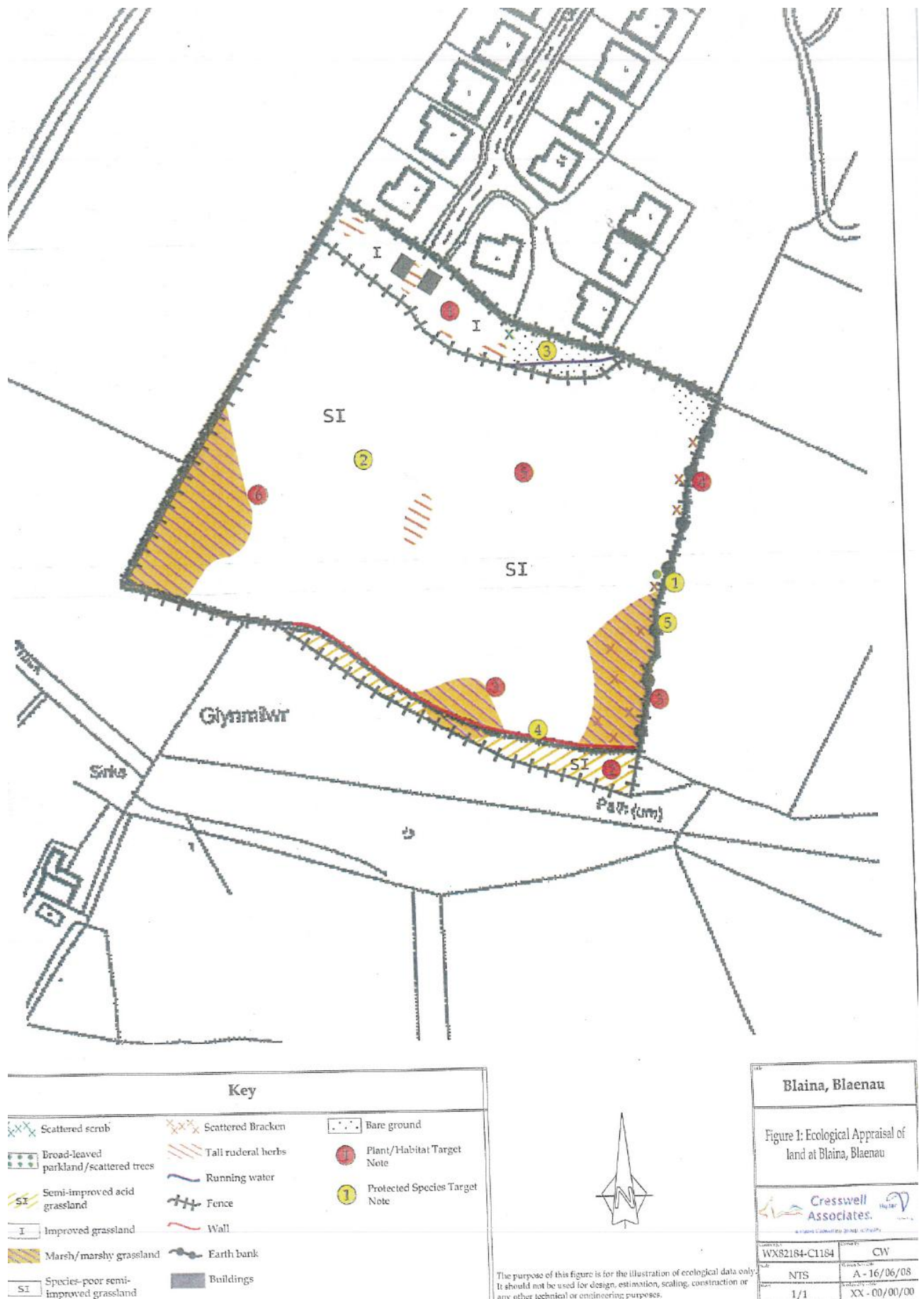
Quadrant Engineers

WIGLEY FOX PARTNERSHIP
Chartered Architects, Surveyors & Urban Designers

Wigley Fox Partnership Ltd
100, The Quadrant, Blaina, Gwent, NP23 5JH
Tel: 01493 711111 Fax: 01493 711112
Email: info@wfgp.co.uk Website: www.wfgp.co.uk

Project Name: Tanglewood, Blaina, for Central Estates Ltd.
Drawing No: 01/09/18
Scale: 1:1000
Date: 10/09/18
Author: J. Fox
Check: J. Fox
Drawn: J. Fox
Title: Proposed layout

Appendix 4 - Ecological Appraisal Site Constraints Plan



Red Target Notes: Plants and habitats (Figure 1)

Target Note 1 This small area of rough disturbed ground was being utilised as storage for the adjacent housing development. The area supported grassland, ruderal vegetation and bare ground. Species recorded included Yorkshire-fog (*Holcus lanatus*), Tufted Hair-grass (*Deschampsia cespitosa*), Creeping Bent (*Agrostis stolonifera*), Ribwort Plantain (*Plantago lanceolata*), Soft-rush (*Juncus effusus*), Creeping Buttercup (*Ranunculus repens*), Red Clover (*Trifolium pratense*) and Broad-leaved Dock (*Rumex obtusifolius*).

Target Note 2 Small area of species-rich acid grassland, located between old stone wall and fence. The short grazed sward comprised Red Fescue (*Festuca rubra*), Sweet Vernal-grass (*Anthoxanthum odoratum*), Matgrass (*Nardus stricta*), Wavy Hair-grass (*Deschampsia flexuosa*), Sheep's Fescue (*Festuca ovina*), Yorkshire-fog, Sheep's Sorrel (*Rumex acetosella*), Heath Bedstraw (*Galium saxatile*), Tormentil (*Potentilla erecta*), Bilberry (*Vaccinium myrtillus*) and Heath Wood-rush (*Luzula ultilora*). Scattered plants of Bluebell (*Hyacinthoides non-scripta*) and Pignut (*Conopodium majus*) recorded throughout.

Target Note 3 This small area of marshy grassland supported abundant Soft-rush and Sharp-flowered Rush (*Juncus acutiflorus*); with Sheep's Sorrel, Greater Bird's-foot-trefoil (*Lotus pedunculatus*), Creeping Buttercup, Creeping Bent, Rough Meadow-grass (*Poa trivialis*) and Bracken (*Pteridium aquilinum*).

Target Note 4 A stone and earth bank forms the eastern boundary of the site supporting grassland similar to the rest of the field with a large number of Bluebell, Pignut, Bracken and Foxglove (*Digitalis purpurea*) plants.

Target Note 5 This sloping, westerly facing, horse-grazed field, comprised a short sward with a high proportion of forbs, but at relatively low diversity. The grassland supported Red Fescue, Crested Dog's-tail (*Cynosurus cristatus*), Sweet Vernal-grass, Common Bent (*Agrostis capillaris*), Creeping Buttercup, Bulbous Buttercup (*Ranunculus bulbosus*), Meadow Buttercup (*Ranunculus acris*), Sheep's Sorrel, Ribwort Plantain, Salad Burnet (*Sanguisorba minor*), Common Bird's-foot-trefoil (*Lotus corniculatus*), Bluebell, Pignut, Yarrow (*Achillea millefolium*), Common Knapweed (*Centaurea nigra*) and Rough Hawkbit (*Leontodon hispidus*).

It is likely to have originated from improvement of a previous acid grassland and species such as Heath Wood-rush, Wavy Hair-grass, Tormentil and Heath Bedstraw were also recorded at low densities.

Target Note 6 This relatively large area of marshy grassland, at the base of the field, supported abundant Soft-rush and Sharp-flowered Rush; with Oval Sedge (*Carex ovalis*), Sheep's Sorrel, Greater Bird's-foot-trefoil, Creeping Buttercup, Meadow Buttercup, Lesser Spearwort (*Ranunculus flammula*), Ivy-leaved Crowfoot (*Ranunculus hederaceus*), Creeping Bent, Rough Meadow-grass and Bog Stitchwort (*Stellaria alsine*).

Yellow Target Notes: Protected species (Figure 1)

Target Note 1 Sycamore (*Acer pseudoplatanus*) tree with one feature potentially suitable for roosting bats; a hole is present on the main stem. This feature is not currently used, but absence of roosting bats in the longer term should be confirmed.

Target Note 2 Edges of the field are more tussocky and comprise potentially suitable habitat for reptiles and for amphibians. The surrounding habitats are very likely to support reptiles.

Target Note 3 A short section of narrow stream, appears to have been created during recent earthworks. Not suitable for water voles or otters. Frog tadpoles recorded.

Target Note 4 Stone wall likely to be of value to hibernating reptiles and amphibians, and may be of value to invertebrate species.

Target Note 5 Stone and earth bank likely to be of value to hibernating reptiles, and may be of value to invertebrate species.

Appendix 5 – Illustrative Layout Plan

Tanglewood, Blaina



WIGLEY FOX PARTNERSHIP
 Chartered Architects, Surveyors & Urban Designers
 10, The Quadrant, Cardiff, CF10 1AT
 Tel: 0300 300 0000
 Email: info@wff.co.uk
 Website: www.wff.co.uk

00800 4
 Planning

PHASE IV
 Option 4
 25 Plots



Tanglewood, Blaina Proposed Development Extension

scale 1:1000 approx
for capacity purposes only



