

ES7.1



Blaenau Gwent County Borough Council

Local Development Plan

Hearing Session 7: Employment and Mixed Use Sites

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Examination 2012

Blaenau Gwent County Borough Council Submission

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SESSION 7

EMPLOYMENT AND MIXED USE SITES

Introduction

This Statement has been prepared by Blaenau Gwent County Borough Council in order to help facilitate appropriate discussion at the Employment and Mixed Use Sites 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 Employment and Mixed Use Sites are contained in the Report of Representations (**SD07b**).

Council Response to Inspector's Questions (questions in bold)

1. Is the allocation of employment and mixed use 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, policy designation and site boundaries drawn been based on appropriate criteria with a clear audit trail?

Is the allocation of employment and mixed use 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?

Yes. It is considered that the allocation of employment and mixed use sites is based on a sound process of sustainability appraisal including testing of reasonable alternatives and represents the most appropriate strategy.

To summarise, the Plan has been subject to a thorough and comprehensive Sustainability Appraisal throughout its preparation which is set out in the following reports:

- **SD04a:** Sustainability Appraisal (March 2011)
- **SD04b:** Sustainability Appraisal Appendices (March 2011)
- **SD04c:** Sustainability Appraisal – Non Technical Summary (March 2011)
- **SD24:** Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA) Scoping Report (Nov 2007)
- **SD25:** Draft Preferred Strategy
- **SD26:** Initial Sustainability Appraisal Report

The reports identified above record all the sustainability work undertaken in predicting and evaluating the effects of strategic options and preferred policies as well as the selection of preferred sites for the delivery of development.

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. The strategy results in the identification of 180 ha of employment land across the Borough, mostly for B1, B2 and B8 uses. The economic climate has changed markedly since this time and there is now much less opportunity for large inward investment projects. There is also a greater need to diversify the economy.

The main aim of **Option 2: Growth and Regeneration** is to diversify the economy and develop manufacturing. The rationalisation of existing sites and the identification of more business sites at mixed use quality sites nearer the town centres with a concentration on Ebbw Vale was a key aim of this option.

Option 3: Balanced and Interconnected Communities recognises the need for large manufacturing sites is no longer at the level that it was in the UDP (**SD127a**) and proposes the de-allocation of land identified for manufacturing in the north and seeks to replace it with sites closer to the main towns of Abertillery, Brynmawr, Ebbw Vale and Tredegar.

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.

In addition to this, as set out in **SD30** Candidate Site Methodology Paper, all candidate sites were assessed against the Preferred Strategy and the LDP Sustainability Objectives. Appendix 1 summarises the results of this process for all candidates sites.

Have the site selection, policy designation and site boundaries drawn been based on appropriate criteria with a clear audit trail?

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

- **SD32a:** Findings of the Candidate Site Assessment Process
- **SD32b:** Findings of the Candidate Site Assessment Process: Appendix 1: Tredegar Sites
- **SD32c:** Findings of the Candidate Site Assessment Process: Appendix 2: Ebbw Vale Sites
- **SD32d:** Findings of the Candidate Site Assessment Process: Appendix 3: Upper Ebbw Fach Sites
- **SD32e:** Findings of the Candidate Site Assessment Process: Appendix 4: Lower Ebbw Fach Sites
- **SD77:** Employment Sites and Premises Study

It is considered that the site selection and policy designation process has been based on appropriate criteria and supported by a clear audit trail. This is

evidenced by the production of documents **SD32a-e** as listed above. For each site the Council summarises the results of each of the 6 stage assessment process and clearly justifies the reasons why the site should be allocated in the Plan or not. Attached at Appendix 1 is a table which ranks the candidate sites according to the results of stages 4 and 5 of the process.

In addition to this, the Council have taken into account recommendations in the Employment Sites and Premises Study (**SD77**, pages 74-75) to de-designate employment land allocations or re-designate to other uses. The Inspector's attention is directed to **ES6.1** (question 4).

To ensure that the site boundaries have been appropriately drawn, the Council worked collaboratively with other internal departments, and collated the information obtained from the candidate site assessment process (stage 1, 2 and 3) identified known constraints on the site and adjacent land. Where appropriate, these known constraints have been excluded from the site boundary, where they could not be avoided, the site description, as set out in **SD34** Site Descriptions Document identified the constraint and appropriate mitigation required.

Further consultation, both internally and externally (with identified consultees at stage 3 of the candidate site assessment process) was undertaken on the site boundaries.

In addition to this, the site allocation boundaries have been drawn to ensure they follow logical and defensible boundaries.

Site MU3

<p>1. Are the boundaries for this site soundly drawn? What would be the implications of amending them to incorporate adjacent land?</p>
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Are the boundaries for this site soundly drawn?

Yes. The Council consider that the site boundary for allocation MU3 has been soundly drawn. The drawing of the site boundary followed the same process as described in question 1 above. The site boundaries of all allocations have been drawn to ensure they follow logical and defensible boundaries. It is considered that the proposed amendment would not follow a logical line.

In order to ensure that the site boundary of the site has been soundly drawn, the Council reassessed the site against the candidate site assessment methodology to reflect the proposed boundary amendment. As set out in Appendix 1, the proposed boundary amendment to the MU3 site allocation performs less favourably when compared to the candidate site assessment result (the deposit plan site boundary) when assessed against the Preferred Strategy and Sustainability Appraisal Objectives.

It is also acknowledged that the representor assessed the site against the Preferred Strategy and Sustainability Appraisal Objectives. The Council's assessment is based on the views received from the expert assessments and has produced a different result to that of the representor. The representor fails to take into account a number of issues in particular the loss of the former Kwik Save store as a significant retail opportunity for Brynmawr town centre.

What would be the implications of amending them to incorporate adjacent land?

The implications of amending the site boundary of MU3 to include the adjacent land which was formerly occupied by the Kwik Save store would be significant. As set out in Strategic Policy SP3 and the mixed use allocation MU3, the purpose of the allocation of the NMC Factory and Former Bus Depot site is to ensure that Brynmawr town centre benefits from the presence of the Lakeside Retail Park development through creating a link site. To include the former Kwik Save store would not be in accordance with the aim of the MU3 allocation.

The former Kwik Save buildings are viewed as an important retail opportunity for Brynmawr town centre in that the building is a relatively large vacant space located at the gateway to the town centre. The Council have recently received a number of enquiries from potential investors interested in developing the site for retail purposes. Therefore for the benefit of Brynmawr town centre, the allocation should not be amended to include these buildings.

Site MU1

1. The Delivery and Implementation section of the Plan identifies some public sector grant for the delivery of MU1, the largest allocation of employment land to be "delivered". To what extent is the delivery of this project dependent on public sector grant? Is the necessary public sector funding package in place to secure private sector investment?

The MU1 site comprises of two employment allocations, namely Rhyd y Blew and Bryn Serth. These two sites are included in the Ebbw Vale Sustainable Regeneration Framework (**SD59a-b**).

The Rhyd y Blew site is owned by Welsh Government and is a priority for investment from an approved European Convergence project, with approval imminent for the necessary match funding, from Welsh Government resources. This project relates to infrastructure. There could well be additional public sector funded projects on the site, for construction of business premises. The site is designated in the Blaenau Gwent Enterprise Zone and is likely to benefit from enhanced capital allowances for investment in plant and machinery, business rate relief for a number of years and super fast broadband which will make the site extremely attractive for inward investment projects.

In the case of Bryn Serth, this is a privately owned site and is not dependent on public sector funding. The site benefits from outline planning permission and relies on the private sector for implementation. The site is included in the proposed enterprise zone and can benefit from the business rate relief proposal for 5 years which will encourage development. Enterprise Zone sites will also benefit from improved broadband.

2. What is the likely impact of developing MU1 on Rhyd y Blew and Bryn Serth SINCS? Will the development result in a significant loss of biodiversity and, if so, is it necessary to conduct mitigation or compensation measures for any biodiversity loss?

Both Rhyd-y-Blew and Bryn Serth have been identified and designated as Sites of Importance for Nature Conservation (SINCS). They are non-statutory sites designated for their substantive value for biodiversity.

It is likely that there would be significant impact on biodiversity through development on the two sites without appropriate mitigation measures being in place.

Bryn Serth already has the benefit of planning permission in which the issues associated with the SINC (ENV3.2) have been addressed. This includes a management plan to manage those areas not developed to enhance habitats and species and a S106 agreement, which secured £25,000 as compensation for lapwing habitat remediation.

Rhyd-y-Blew (ENV3.27) is a Welsh Government (WG) strategic employment site and forms part of the Enterprise Zone. WG have already undertaken lapwing compensation measures at Parc Bryn Bach.

It will be necessary for any future application to be informed by a Phase 1 Habitat Survey. It will be necessary to provide adequate mitigation and/or compensatory provision for the likely impacts of the development. This will need to be specific to the biodiversity of the site and the impacts of the individual development proposed. Any such mitigation would need to consider the retention and enhancement of green corridors through the site.

However, whilst it is important to protect the biodiversity of SINC's from inappropriate development, it should be noted that in accordance with national policy the designation of SINC's does not preclude socio-economic activities (W41, paragraph 5.4.4). However, any planning application will be required to accord with Policy DM15.

3. Is it necessary to amend the site designation of MU1 including on the Proposals Map to identify green links? Are the boundaries of this site appropriately drawn?

Is it necessary to amend the site designation of MU1 including on the proposals Map to identify green links?

It would not be appropriate to include this level of detail on the proposals map. The Ebbw Vale Sustainable Regeneration Framework has identified a green corridor in this area. The Inspector's attention is drawn to Figure 7.2. The Ebbw Vale Sustainable Regeneration Framework Figure (SD59a), which identifies the key strategic green links for this site.

Are the boundaries of the site appropriately drawn?

Yes. The Council considers that the site boundary for allocation MU1 has been soundly drawn. The drawing of the site boundary followed the same process as described in the Council's response to the Inspector's first question (page 1). The site boundaries of all allocations have been drawn to follow logical and defensible boundaries.

The site boundary to the northwestern edge of the site is the subject of a focussed change FC10B following concerns raised at the draft Deposit Stage. In agreement with Countryside Council for Wales and Newbridge Construction the Focussed Change the boundary was amended to facilitate the widening of the green wedge (SD10a page 15, FC10.B).

Appendix 1

Ebbw Vale Area

Ref No.	Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed sites for LDP Deposit Plan					
B44	Willowtown School	20	57	77	22
B5, B7, B8, B46	Ebbw Vale North (Mixed Use allocation)	40	32	72	700
				Total	722
B21	Waunlwyd School	16	49	65	12
AS (N) 04	Land at Big Lane – Site 6	18	42	60	
B20	Highlands Road	14	39	53	60
AS (N) 02	Land at Big Lane – Site 4	14	39	53	
AS (N) 03	Land at Bryn Farm – Site 5	14	33	47	
AS (N) 05	Land off Parkhill Crescent	16	31	47	
B16	Lakeside Car Park, Festival Park	11	29	40	14
B19	Vacant site adj Respite Care Centre	12	27	39	10
B24	Land adj to the Castle, Rassau	10	25	35	12
B35 AS (N) 01	Nant-y-Croft, Rassau	10	21	31	51
Sites taken out at Stage 2 assessment					
B1	Adjacent to Wrekin Site, Aberbeeg				
B9	Land at Bryn y Gwynt				
B10	Drysiog Farm				
B11	Land off Parkhill Crescent				
B12	Land off Pant-y-Fforest				
B15	Land surrounding Wetlands Building, Festival Park				
B18	Cwm Slopes, Festival Park				
B23	Land at Park View, Beaufort				
B24	Land adj to the Castle, Rassau				
B41	Land to the rear of Glyndwr Road, Rassau				

This table identifies the best performing housing sites in the Ebbw Vale Area.

The site in yellow performed well against the assessment but has issues with it which means that it should not be taken forward.

B21 - Waunlwyd School: On reflection this should be classed as a small site as realistically it can only accommodate 6-8 houses due to the shape of the site and the need to retain the boundary walls.

Tredegar

Ref No.	Site Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed Sites for LDP Deposit Plan					
A21	Corporation Yard	20	57	77	12
A45	Jesmondene Stadium	20	53	73	179
A25	Cartref Aneurin Bevan	20	51	71	13
A26	Greenacres	20	51	71	18
A43	Business Resource Centre	18	51	69	42
A19	Waundeg Housing Site	16	53	69	30
				Total	294
A22	Land at Sirhowy	16	49	65	30
A4	Former Gas Holder Station	16	49	65	17
A23	Land adjacent to Bryn Rhosyn	16	49	65	24
A11	Tredegar Ambulance Station	16	47	63	17
A28	Land at rear of Cripps Avenue	14	45	59	30
A12	North Side of Merthyr Rd	14	41	55	21
A13	Land to the North of Bryn Rhosyn	14	39	53	17
A46	Land South of Bevans Avenue	16	33	49	69
A36	Adj Chartist Way	13	35	48	101
A47	Park Hill	13	32	45	378
Sites taken out at stage 2 assessment					
A5	Northern boundary to Bryn Pica				
A6	Land opposite Hunts Lodge				
A7	Rear of Factories and Pochin House				
A10	The Rhyd, Peacehaven				
A16	Tyr Morgan Hywel Farm, Nantybwh				
A24	Land at Golwg-y-Mynydd				
A27	Mile End Field, Georgetown				
A41	Land adjacent to Dukestown Cemetery				
A44	Fairview Field, Nantybwh				

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 indicated who owns or controls the land to gain access to the site.

The end of the cul-de-sac of Bevan Avenue – given the existing cul de sac length of Bevans Avenue is already in excess of the design maximum permitted vehicular access would not be permitted to serve as access to any development proposal.

A36 - Adj Chartist Way: The contribution figure is likely to be lower due to constraints.

A47 -Park Hill: The site has planning permission

Upper Ebbw Fach Area

Ref No.	Name	LDP Objectives	SEA/SA	Total	Contribution
Proposed sites for LDP Deposit Plan					
C6	Garnfach School (based on mixed use allocation)	23	57	80	12
C22 & C32	NMC Factory Blaina Road (Mixed use allocation)	29	49	78	60
C25	Brynmawr Infants School & Old Griffin yard	20	57	77	37
C8	Hafod Dawel Site	20	57	54	44
C23	Crawshay House	20	53	73	25
C26	Land at Pant View, Coed Cae	20	53	73	26
C39	Land to the east of Blaina Road	19	53	72	21
C12	Land to the North of Winchestown	20	49	69	15
			Total		240
C14	Land West of Recreation Ground	20	45	65	16
C24	Land rear of Waunheulog	16	43	59	42
C15 AS (N) 20	Land North of Winches Row	14	41	55	110
AS (N) 18	Ffoesmaen Road	14	41	55	
AS (N) 14	Land at Beaufort Hill – Site 2	14	39	53	
AS (N) 16	Land east of Pant View Houses, Coed Cae	14	35	49	
AS (N) 13	Land at Brynmawr – Site 1	14	33	47	
AS (N) 15	Land at Bryn Farm – Site 3	14	29	43	
C3	Land to the south of Rising Sun Industrial Estate	10	33	43	81
C13 AS (N) 19	Land to the South-West of Waun Ebbw Road	14	35	49	50
C5 AS (N) 17	Southlands, Blaina	10	25	35	52

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	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

Ref No.	Name	LDP Objectives	SEA/SA	Total	Contribution
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
			Total		165
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.

Employment Allocations: 50ha

Ref	Site Name	LDP	SEA/ SA	Total	Area Ha (Dev Area)	Comments
B14	'The Works' Business Hub (Mixed Use Allocation)	42	60	102	5.0 (3.5)	Committed site
B7 B13	Ebbw Vale Northern Corridor (Mixed Use Allocation)	32	40	72	(23.16)	
B33	Garden Festival C	17	41	58	0.95 (0.66)	
A32	Tafarnaubach Central	13	41	54	0.7 (0.46)	
C29	Cwmcrachen Lower	13	38	51	2.37 (1.51)	
B30	Waun-y-Pound Central	13	37	50	0.59 (0.31)	
B31	Waun-y-Pound	13	37	50	6.31(4.62)	
B32	Garden Festival A	13	37	50	1.6 (0.61)	
A31	Tafarnaubach West	13	37	50	1.2 (0.84)	
D22	Roseheyworth Business Park	13	33	46	2.56 (1.52)	
C16	Rising Sun Upper	13	33	46	1.48 (0.99)	
A15b	Crown Business Park	13	33	46	0.72 (0.68)	
C19	North Rising Sun Ind Est	13	33	46	3.13 (1.62)	
B27	Rassau	9	37	46	4.8 (3.36)	
A33	Tafarnaubach North	11	33	46	1.07 (0.79)	
C28	Adjacent to Blaen-y-Cwm School	11	32	43	1.42 (0.85)	
A30	Crown Business Park	9	33	42	2.21 (1.62)	
A14	Tredeggar Workshops	12	29	41	3.0 (2.07)	
B34	Marine Colliery	9	31	40	6.50 (3.40)	
Total Developable Area					52.57 ha	
A35	Tafarnaubach South	11	29	40	1.53 (0.46)	
B29	Waun-y-Pound North	11	27	38	0.65 (0.33)	
A34	Tafarnaubach East	11	27	38	1.2 (0.56)	
A29	Crown Business Park	11	21	32	1.4 (0.8)	
B26	Rassau Extension East	7	25	32	8.0 (3.73)	
B28	Rassau Platform H	7	23	30	3.27 (2.45)	
B25	Rassau Extension West	7	13	20	33.6	
Sites taken out at Stage 2 Assessment						
B6 – Land adjoining Rassau Industrial Estate, Carno						