

## TORFAEN FRIENDS OF THE EARTH SUBMISSION TO THE TORFAEN

### LOCAL DEVELOPMENT PLAN CONSULTATION 2011

Thank you for the opportunity to comment on this LDP.

This submission is a compilation of comments gleaned from members both orally and by written report from individuals. Various members looked at separate geographical areas as well as the overall presentation of the plan. Therefore, the style of language varies and, in some instances, similar points will arise within the text. The finished document has been circulated via email and has been agreed.

In making this submission, Torfaen FOE is mindful of the requirements placed upon local authorities as part of regional development strategy. Nevertheless, Torfaen FOE believes that local authorities have to grasp the nettle on issues of sustainability, which is not served by developer led options.

Specific concerns:

- 1 The Torfaen LDP is unbalanced in design as it continues the north/south divide. The practice of following the dictates of developer led market trends concentrates growth in those areas which need it least. The opportunities afforded by the World Heritage status of Blaenavon for employment and appropriate development have not been realised within the plan.
- 2 By not “bucking the trend” of developer led assessment of market trends for easy build/easy sell for higher profit, the Council will increase the pressure on the residents in the south of the Borough to such an extent that it will force people away from the area, as they see their quality of life eroded by increased traffic, pollution and loss of natural green field amenity.
- 3 The risk to green field and species habitat, some of regional importance, is not to be regarded as insignificant and it goes to the root of our own survival as a species. It is not being given serious enough emphasis in the planning process.

This is borne out in the report by the National Assembly for Wales Sustainability Committee's Inquiry into Biodiversity in Wales, January 2011.

It is further recognised that it is more difficult to implement the requirements of mitigation in the Strategic Environmental Assessments Directive once planning permission has been granted. Current policy requires only a period of management of 20 years post development. After that it is left to species to survive unprotected except by their own devices.

- 4 The bold statements in the text of the LDP on sustainability, environmental protection and low carbon options are not borne out by the inclusion, for example, of the South Sebastopol proposed development of a huge housing estate. The current planning applications before the Council for determination are not subject to the Code for Sustainable Homes by virtue of the outline planning application being "refreshed", and not new.

The detailed planning application for Phase 1 is intended to be "piggy-backed" onto the outline application, should it be approved, to make it a full application. Therefore 1200 houses are not to be sustainable. This inclusion alone makes a mockery of statements of sustainability within the LDP and renders it not fit for purpose.

- 5 There is an overprovision of housing development land in this LDP which will limit options for future LDPs. The Welsh Assembly Government requirement is for 5000 in the life of this Plan period but the Council is proposing to build 6000.
- 6 The proposed Mamhilad site, included as acceptable in the proposed LDP, previously rejected by the Council in favour of South Sebastopol, will realise 1700. There is a significant area of green field within this allocation, which will require careful mitigation, but the major area is brown field and it has existing internal road provision. In the examination of candidate sites it scores 8 against a mere 3 for South Sebastopol. The inclusion of this site negates the need for South Sebastopol.

- 7 Identified available brown field sites, (some of which have been included in the proposed LDP and others rejected):

Forgeside Road, Blaenavon, between Forgeside Road and Railway line, is a large ex-industrial site, no longer in use. Easy access.

A4042 road ex Parke Davies site plus parts of the old ICI site.

Station Road Panteg Steelworks and museum site.

The British – ex mining and industrial sites. Due to the 500 metre zone required between open cast mining and housing, the plan to open cast this area is impossible. Therefore housing in this area is ideal, once the site has been made safe.

Trico Factory site, Pontypool. now shut down, ideal location.

- 8 The planned expansion of Cwmbran Town Centre for retail parks will have a huge impact on the local infrastructure and beyond, affecting an already clogged road network, which will increase traffic levels far beyond present levels and which will affect South Sebastopol directly. The plan for South Sebastopol has been drawn up with only three parties' interests at heart: Pontypool Park Estates, the Developers' Consortium and Torfaen CBC. These are the main driving forces for the South Sebastopol development for they will receive the most financial benefit. The environment is seen as something to exploit and make money from and not something to treasure, enhance and enjoy.

- 9 Due to the decline in manufacturing industry, Torfaen has lost many of its major employers in the coal industry, Parke Davies, ICI, Panteg Steel Works, Trico, Saunders Valves, GKN, and Girlings have also cut right back. To encourage people to move into Torfaen is unsustainable because the jobs market is too weak. Anyone moving into Torfaen would still need to find employment elsewhere, with the result that Torfaen's environmental footprint could well end up as being worse than that of a local authority twice its size due to the increase in car use alone.

Continued with attachment.

## 2c New Policy

“To promote, within the LDP process, a policy of eradication of the north/south divide of local residents’ needs for housing and employment, and to promote this policy to prospective developers by virtue of a scoring system for planning applications which would reflect their commitment to the Council’s policy.”

To be inserted in P1 “Procedural Tests”