

Brecon Beacons National Park Authority
Local Development Plan

Deposit Stage Comments Form

If filling in this form electronically, please type free text into the grey boxes, to place a cross into a check box, double click on it and select "Checked" from the options.

PART 1: Contact details

Your details		Agent's details <i>(if relevant)</i>
Title:		
Name:	Llanelly Community Council	
Job title: <i>(where relevant)</i>	Clerk to the Council	
Organisation: <i>(where relevant)</i>	Community Council	
Address:	Council Chamber, Old School Community Centre, School Lane, Gilwern.	
Telephone no:	01873 832 550	
Email: <i>(if you have one)</i>	clerk@llanellycc.org.uk	

You should include all your comments on this form. If you are submitting the form electronically, the form is designed to expand as necessary. If you are submitting a paper copy, please add additional sheets as necessary.

PART 2: Commenting on the Plan

The Brecon Beacons National Park Authority Local Development Plan (LDP) will be examined by an independent Inspector appointed by the Welsh Assembly Government.

It is the Inspector's job to consider whether the Plan is sound. There is no legal definition of 'sound' but in this context we use its ordinary meaning of 'showing good judgement'

The questions or 'tests' which the Inspector will consider in deciding whether the Plan is sound are in Part 6 of this form. It may help you to read them and the guidance in Part 5 before you tell us what you think of the Plan and its policies.

Before you set out your comments in detail, it would be helpful to know whether you think the Plan is sound, or if you think that all or parts of it are unsound and needs to be changed.

I think the LDP is sound (please turn to part 3)

I think the LDP is unsound and should be changed **(Yes)** (please turn to part 2a below)

2a Which part(s) of the Plan are you commenting on?

(Please see question (2 b) below if you want to include a new policy, paragraph or site)

My comment is about:

Policy number(s) P.12, P.13, SP6

(and/or)

Paragraph or section number(s)

Sec 6 Para 6.1.2, 6.1.4, 6.1.6, 6.1.9, 6.2.2, 6.2.2.4, 6.3.9.2,

Sec 4 Para 4.8, 4.15.2, 4.15.2.2,

Sec 7 Para 7.1.5, 7.1.7

(and/or)

The Proposals Map *(please tick)*

2b Would you like the Plan to include a new policy, paragraph or site?

[Tick all that apply]

a new policy

a new paragraph or new text

(please turn to part 3 to tell us where you think the new policy / paragraph or text should go in the plan)

a new site

If you want to suggest a new site, please attach a site plan identifying the boundaries of the site you wish to be included in the Plan and tell us the sites existing use and what you would like it to be included in the plan as.

Existing use

Proposed Use

If you are proposing a new site, you will also need to undertake sustainability appraisal to consider the impact on sustainability the inclusion of your site is potentially likely to have.

The NPA has already undertaken SA on a range of sites, including candidate sites click here to see if the site your alternative site has been assessed [http://planning.beacons-
npa.gov.uk/PublicAccess/ldf/ldf_home.aspx](http://planning.beacons-
npa.gov.uk/PublicAccess/ldf/ldf_home.aspx)

If you are happy with the findings of the SA as defined through our assessment, you do not need to repeat this work. If however you are unhappy with the findings you will need to undertake your own SA (see below)

If your site has not been assessed as part of the NPAs SA of options, you are **strongly advised** to undertake this work yourself. The NPA has produced documentation on undertaking SA to guide you in the process This is available by clicking here [http://planning.beacons-
npa.gov.uk/PublicAccess/ldf/ldf_home.aspx](http://planning.beacons-
npa.gov.uk/PublicAccess/ldf/ldf_home.aspx)

2c If you want to add a new site, did you submit the site as a Candidate site? If so, please give the Candidate Site name and reference (if known)

Site name

Site Reference

Part 3: Your comments and suggested changes

Please set out your comments below using additional sheets as necessary.

If you want changes made to the Plan, please be specific. For example, if you want new text added, please set out the new text and explain where it should go in the Plan.

If you want changes to the Plan, we will assume you do not consider the Plan to be sound. However, please note that it is not the role of the Inspector to make an acceptable plan better.

If you do not consider the Plan to be sound and that it should be changed, please explain clearly why you think the changes are needed. If you think a change is needed for the Plan to meet one or more tests of soundness, please tell us which one(s).

Your comments should be set out in full. This will help the National Park Authority and the Inspector to understand the issues you raise. You will only be able to submit further information to the Examination if the Inspector invites you to address matters that he or she may raise. Please note that the Inspector will not have access to comments you may have made in response to previous consultations.

Please indicate if you are submitting other material to support your comments.

If you think the plan does not meet one or more tests of soundness (see Part 6), please indicate here which test(s) it does not meet

P1 <input checked="" type="checkbox"/>	P2 <input type="checkbox"/>		
C1 <input type="checkbox"/>	C2 <input type="checkbox"/>	C3 <input type="checkbox"/>	C4 <input checked="" type="checkbox"/>
CE1 <input type="checkbox"/>	CE2 <input checked="" type="checkbox"/>	CE3 <input checked="" type="checkbox"/>	CE4 <input checked="" type="checkbox"/>

Comments

Brecon Beacons National Park Authority Deposit Local Development Plan Deposit stage comments

Llanelly Community Council (LCC) is the second largest community in the Brecon Beacons National Park (BBNP) after Brecon Town. The Community Council do not wish to raise objection to the deposit Local Development Plan (LDP) in relation to the 106 contributions but would like BBNP to seek opinions from Local Community and Town Councils on projects in their Communities where new development is being considered.

There are a number of items included in the LDP document which LCC consider are not meeting the test of soundness.

Comments relating to 6.1 of the LDP

Section 6 Housing 6.1 housing provision

1. It appears that 6.1.4 is in conflict with 6.1.2. This section states that evidence base requires a mixed type growth size development. 6.1.4 States that National Park is unlikely to experience net growth over the period of this document. 6.1.6 Also states that the findings of the settlement assessment process, indicates that there is a desire from communities for capacity to accommodate appropriate development

2. Areas in the Llanelly Community and the communities in the Llanelly Hill area will be restricted in the growth and sustainability. Llanelly Hill and the Community of Maes-Y-Gwartha were level 3 settlements under the existing UDP but under the LDP will now be classed as open county side. No one wants larger scale development in the communities of Maes-Y-Gwartha and Llanelly Hill detailed in the UDP but small scale development or back land in fill will help to retain young local people and provide natural growth of rural villages to allow communities vitality and good quality of life.

3. LCC have concerns over the position of Communities like Llanelly Hill under this LDP. There is no provision for growth or to retain local people in their area. This may be in conflict with any regeneration programmes Monmouthshire County Council may wish to undertake. There are areas of land on Llanelly Hill which may be classed as brown field sites, but under this policy community regeneration will impact on the community significantly. There are also a number of properties which will benefit from regeneration programmes but putting communities like Llanelly Hill in an

area classed as open countryside will impact on sustainability of a community and any new development will be detrimental.

Fails: to test the soundness

CE1:- Policy will not allow the development and meet the objectives of the proposed strategy in the document.

C4:- The policy does not have regard to relevant communities and the strategies for National Park Management.

Comments relating to 6.2.2 of the LDP

4. LCC recognises the policy on the restriction on the size of extensions to properties, demolition or replacement of dwellings but consideration needs to be taken into account regarding the size of properties in communities in this area. Most of the properties are old miner's cottages and 6.2.2.4 will restrict the economic development of a community if families are unable to regenerate a dwelling or provide a home in a community. This would be in line with spatial strategy "Sustainable living in a National Park Landscape" Placing a restriction on a property with a small "foot print" may be in conflict with the Local Government Housing Act 1989 and will be detrimental to people with any mobility problems from remaining in their homes.

Fails test of soundness:

CE2:- No evidence how this will be achieved under the robust or credible evidence base.

CE3:- There is no clear mechanism for implementing or monitoring policy SP6 to enable the provision of affordable homes

P1:- It is clear that the Community involvement through the consultation doesn't wish to have such restrictions placed on them as in policy 12 and 6.2.2.4.

Comments relating to 6.3.9 and Policy 13 of the LDP

5. Due to the lack of evidence and any guidance under 6.3.9.2 the Community Council have concerns to the contribution level which individuals may have to provide towards affordable housing, for a family to retain their family connection in any area. If contributions are going to be expected to be commuted by sole individuals, this will place a greater expectation on affordable homes in communities and social land lords.

Fails test of soundness:

CE2:- the strategy fails to provide a realistic expectation on housing targets and this will not achieve a robust or credible outcome.

CE3:- There are no clear mechanisms for the monitoring Policy SP6 and achieving any affordable housing for local people.

Comments relating to 4.15.2 of the LDP

6. LCC recognises the view to protect the BBNP and the beauty of the National Park and the number of people visiting this area for the outstanding views and natural beauty. Consideration must be given to renewable energy with the view on peak oil. Communities and individuals must consider renewable energy sources. Under 4.15.2.2 communities may need to consider group energy projects so the renewable sources will be of more financial benefit to a community at large.

Fails test of soundness:

CE4:- It will be unreasonable to consider small scale development to deal with changing circumstances.

Comments relating to 4.8 of the LDP

7. LCC considers that the protection of trees to be beneficial and an amenity to the local communities. Trees in communities provide natural beauty in the countryside, villages and towns and are a vital part of everyone's foot print in reducing the carbon dioxide.

The Community Council believe that trees need more protection from individuals. Cutting trees down for extra personal light into the properties or for personal reasons is not acceptable This is not just on new development sites but in the community in general.

Fails test of soundness:

C4:- The management of preservation of trees is outside the development areas and is not part of the deposit LDP document.

Comments relating to 6.1.9 of the LDP

8. LCC has concerns over further development in the Community as residents are finding the drainage infrastructure is failing on a regular basis.

Dwr-Cymru Welsh Water have requested that before any further development can be considered in 2016, essential improvement works should be carried out under the DCWW. Should any land be considered for development before the improvements are undertaken, BBNP should consider these issues and show a proactive stance with regard to the infrastructure improvements.

The Community Council is led to believe that improvement works were due to be under taken in the mid 2000s at the Treatment Works at Aberbaiden. The Community Council believe that development at Lancaster Drive in the UDP has constraints placed on this site before any application is considered.

Comments relating to 7.1 Economic Wellbeing of the LDP

9. LCC considers that no land has been identified for employment purposes.

This community is the second largest community after Brecon, but the LDP is relying on employment opportunities outside the BBNP and our community for our residents. Without economic growth communities cannot be sustainable and more reliance is placed on the motor car. Under 7.1.5 this community cannot rely on farm diversification or working from home as the area is failing with broad band technology. 7.1.7 would appear to be in conflict with 7.1.5. Without generating land use which will give general opportunity for employment, sustainability will difficult to achieve.

Fails test of soundness:

CE1:- the plan seems not to be a coherent strategy to achieve the economic well being in the community