

Judith Doyle - Glamorgan-Gwent Archaeological Trust Ltd

Good Morning

Thank you for notifying us of the Cwrt y Gollen Development Brief within the LDP; the area is outside our geographical area of responsibility and we have no further comment to make.

Regards,

Judith Doyle BA MIfA
Acting Archaeological Planning Manager
Glamorgan-Gwent Archaeological Trust Ltd Heathfield House Heathfield Swansea
SA1 6EL

Paul Sinnadurai MCIEEM, M.WACCM - Brecon Beacons National Park Authority

Some initial comments on the design brief. It's encouraging to see that a lot of the environmental components that we sought first time round have become core to this proposal. The comments below just re-iterate some of those points:

- Development density and broken and open edge adjacent to the parkland: welcomed but may need some planning restrictions to prevent subsequent in-fill development
- Parkland managed to improve biodiversity: welcomed, will require a management plan (S106?); recommend integrating this with sustainable urban drainage to create wetlands, provide irrigation for community food-growing areas etc
- Tree planting also for biodiversity enhancement reasons, e.g., to create green space continuity through the development (e.g., a landscape fit for bats and birds)
- Tree planting will be required anyway for the two purpose-built bat houses that have previously obtained planning permission, to facilitate bat navigation to and fro and to provide cover
- Tree planting will therefore have to be considered in relation to street lighting, to minimise glare, light spill and deterrent effect on bats
- Architectural design standards, green design: how far will this go? Living surfaces?
- Architectural design standards, using natural resources: this point was made for the previous design brief, i.e., building design needs to start with sustainable urban drainage, rainwater recycling, green solutions for grey water/sewage disposal in mind, so that capacity for these is maximised rather than retro-fitted; this will then influence the layout and design of the buildings
- Local food growing: capacity needs to be based on a percentage of the residential population being provided with the facilities to participate; so does this mean facilities available to 100% of properties? 50%? 25%? What's the vision, what's the local need, what's the future need (resilience, flexible design)?
- Children's play spaces: what's the vision for integrating this with biodiversity mgmt. of parkland, local food growing?

- Transition communities: what scope is there for this development to be designed as a transition settlement? What design principles can be tested here? (Scope for research by Cardiff University?)
- Community shop: as a hub for local business products, local food production? Farm produce supermarket? See <http://www.suffolkfoodhall.co.uk/> for example
- Energy, heating: what scope is there for district heating systems, combined heat and power, PV-ready houses, wood-fuel-ready houses, ground-source heat-ready houses?
- Please ensure that houses have chimneys/flues built in as standard, to future-proof them
- Car parking: what will the developers offer to minimise hard-standing (surface runoff) and over-capacity for parking? Welcome the idea of courtyard parking
- Street scene and neighbourly interaction: the intent, through street scene to encourage interaction is welcomed, however if these properties effectively become commuter homes for city slickers, interaction will be minimal. Therefore the developers need to ensure that they've integrated the design to give neighbours something to interact about and to find local employment
- Section on Environmental Sustainability: all of this is welcomed, plus see comments above; good to see the LDP working so well so early into its life!
- Public realm: use of common service trenches welcomed
- Intent welcomed to seek comprehensive planning permission, to include long term mgmt. planning and maintenance plan; however, given the 'organic' nature of the development proposed, the BBNPA may need to consider how, within comprehensive permission, flexibility can be achieved to future-proof this development.

Thanks

Paul Sinnadurai MCIEEM, M.WACCM, A. CRhCGChC
Conservation Manager Rheolwr Cadwraeth
Brecon Beacons National Park Authority Awdurdod Parc Cenedlaethol Bannau Brycheiniog
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Mark Walters - Development Control Archaeologist - CPAT

Dear Sir or Madam

Thank you for the consultation on the Cwrt Y Gollen Development Brief.

Having read through the document we are broadly in support of the draft layout proposals, which will have little or no impact on currently recorded archaeology within the development boundary.

The setting of the Court Y Gollen House and Gardens will be preserved and enhanced by the removal of some of the 20th century camp structures and the parkland improvements, with retention of existing open areas in the north of the site.

The proposed 'enhancements' around the scheduled monument close to the main entrance will need to be defined more clearly and early discussions will need to take place with Cadw on designs in this area.

We note that there is no Cultural Heritage section in the proposed EIA contents. Unless Cultural Heritage has been deliberately scoped out for some reason this topic should be included and the CgMs archaeological assessment, which has already been completed, could form the substantive basis of this section. The Historic Environment Record at the Clwyd-Powys Archaeological Trust should be used to enhance the cultural heritage data as new records may have been added in the intervening years.

I look forward to receiving further consultation if a development proposal is taken forward here.

Regards

Mark Walters

Mark Walters

Development Control Archaeologist / Swyddog Rheoli Datblygiad

Suzanne Whiting - Casework Manager - CADW

Thank you for consulting Cadw on the Cwrt-y-Gollen Development Brief. The proposals are in the vicinity of:

- The scheduled ancient monument known as Cwrt-y-Gollen Standing Stone (BR113)
- The listed building known as Le Chateau (20847)
- The registered historic park and garden known as Glangwrwyney Court (PGW(Po)44(Pow))

The proposal to leave much of the parkland area –which has formed the broader setting of the monument since Cwrt y Gollen house was constructed - undeveloped is a favourable one. However, Cadw has some concerns on the treatment of the stone and its immediate vicinity.

Access and movement p7 – any improvement or widening of the access road from the A40 should avoid further encroaching upon the present grassy setting of the standing stone and should therefore be restricted to the eastern side of the present access drive. A worst case scenario would be the stone – one of the finest in Wales- standing immediately adjacent to a road or fenced drive .

Land use principles p10 – Cadw also has some concerns over the vision to ‘enhance’ the site and surroundings of the standing stone as a ‘feature’. Whilst relatively low key, the present setting on grass overlooked by mature trees is pretty much what Cadw would aim to achieve for sites in pasture or parkland elsewhere. It is important that the monument is not encroached upon by clutter such as fencing, signage or interpretation panels.

This is one of the largest standing stones in Wales and the only one of a group of similarly sized examples in the middle Usk Valley with potential for public access. Some sensitively located, on site interpretation, would be welcome in order to highlight its significance – BBNPA have recently installed a panel near rather than next to Maen Llia, which achieves this at a discrete distance. Cadw would be happy to advise on location and content.

The proposals are unlikely to impact on the registered park and garden at Glangrwyney Court, which lies approximately 400m to the east or on the listed building Le Chateau. You may, though, wish to consult Welsh Historic Gardens Trust in respect of the registered park and garden as it is a Grade II designation.

Regards

Suzanne Whiting
Rheolwr Gwaith Achos / Casework Manager

Dale Boyington - Development Control Manager - Powys Transportation and Development Enablement

Good morning

Please find attached the comments from Powyc CC Highways in relation to the development brief forwarded by your authority on the 12th March 2014.

Regards

Dale Boyington
Development Control Manager

Notes for Development Brief 12 March 2014

Cwrt y Gollen

The following comments are made on a without prejudice basis. As a guide to how the overall development is likely to emerge there is little to comment on as much of the text suggests that the design will be in line with the appropriate guidance documents, including our own design guide. However, we reserve our position to alter our comments once a formal submission has been made.

- Adoption - What are their intentions with regards to adoption of highways, given previous discussions? PCC will look to secure a layout that meets adoptable standards and will issue & secure Advance Payment Code notices to protect the public in line with legislation contained within the HA1980.
- Page 7 A40 Junction – Design shall be in accordance with WG/Design Manual for Roads and Bridges standards

- Page 7 - The use of “shared surface” streets requires careful consideration as they often conflict with “inclusive design” objectives and may result in large commuted sums. Consideration will only be given to appropriate lengths that provide adequate DDA provision, adequate levels of parking and siting of services. Consultation with access groups should be promoted and also a pedestrian design audit may be required. They may be appropriate in certain areas however there will definitely be a requirement footways in most locations. (this is all generally covered by the previous reference to design manuals)
 - Material mixture – Advise commuted sums policy will apply to “non-standard” equipment
 - Parking – Parking provision will be in line with the CSS Standards only? On street parking will only be considered for visitor use and street widths shall be designed accordingly. Parking must be “local & usable”
 - Page 8 - Not sure what they mean by reference to “lanes” What is the proposed emergency exit? This will need approval from WG?
 - Page 12 – A comprehensive refuse strategy shall be required. This shall demonstrate that streets will be accessible to those vehicles expected to use it and that adequate provision is provided for the siting of receptacles etc. Close liaison required with HA.
 - Page 14 – Clarification required for Public – Private Realm. PCC will only adopt those areas that form part of the highway & pedestrian links.
 - Page 15 & 17 – Whilst it may well be acceptable to utilise existing road routes, the alignments of such may need to be adjusted to fulfil the desired 20mph speeds and full reconstruction will be necessary to adoptable standards.
 - 20mph design speeds – 20mph design speed is welcomed (page 7), however forward visibility will need to be restricted between 25-70m (main access problem)
 - More detail required on road hierarchy and likely business uses in order to determine road layout and parking provision. What is the emergency lane fore (WG implications)
 - Use of Existing Roads – Whilst the location/alignment of the existing roads may well be acceptable, it is highly unlikely that the construction would be acceptable (page 15)
 - Illustrated Layout little detail potential conflict areas and no sign of turning areas.
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Anthony B. Northcote – The Coal Authority

Dear Sirs

Brecon Beacons National Park Local Development Plan (Adopted December 2013)

The Cwrt-Y-Gollen Draft Development Brief

Thank you for consulting The Coal Authority on the above document.

Having reviewed the document, I confirm that we have no specific comments to make at this stage as the site is located off the coalfield.

Should you require any assistance please contact a member of Planning and Local Authority Liaison at The Coal Authority on our direct line (01623 637 119).

Yours faithfully

Anthony Northcote



Anthony B. Northcote *HNCert LA(P), Dip TP, PgDip URP, MA, FGS, ICIOB, MInstLM, MCMI, MRTPI*
Consultant Planning Advisor to The Coal Authority

Elizabeth Gibbs - Brecon Beacons Park Society

Dear Sir,

**Brecon Beacons National Park Local Development Plan (Adopted December 2013)
The Cwrt-Y-Gollen Draft Development Brief**

I am writing on behalf of the Brecon Beacons Park Society to comment on the Cwrt-Y-Gollen Development Brief. As a society we have opposed the development of Cwrt-Y-Gollen because we considered that it would not accord with either the statutory purposes of the National Park nor the aims of the previous Plans. We now consider that it does not accord with the Local Development Plan, in particular, policies SQ1, 2 and 4 and SP1a. Despite the reduction in the numbers of dwellings, the size of the proposed development would still be excessive since it would add to the already obtrusive developments of Dan Y Gollen and Martell Way to produce a visually intrusive suburban sprawl creeping westwards into the National Park.

Cwrt Y Gollen lies 2.5 km from the Key Settlement of Crickhowell and is outside the settlement extent of Glangrwyney, a designated Level 4c settlement in the LDP. A development of 70 houses and 1.4 ha of employment floorspace in this location would contradict Policy SP10 of the LDP intended to control the spatial distribution of development in the Park in a sustainable way. It would unbalance the nearby small community of Glangrwyney. In his report (APP/P9502/A/10/2132455) on the appeal by Crickhowell Estates against the refusal of their application 09/03405/OUT, the Inspector stated that the development would “represent a large-scale addition to the existing detached enclave of dwellings at Dan Y Gollen/Martell Way, creating a physical form of development that would dominate the western approach to Glangrwyney and overwhelm the scale and form of the historical village core” (page 57, paragraph 253). We consider that this would still be the case even with the reduced number of dwellings. The historic settlement pattern is part of the cultural

heritage of the Park that the statutory purposes require the NPA to conserve and enhance. We suggest that the Development Brief reduces the number of dwellings still further as we understand that the number stated in the LDP Policies SP5, and Policies 33 and 34 is a maximum and does not need to be adhered to exactly.

We would like to make the following further comments as to the details of the Development Brief:

- The parkland character of the site should be preserved, especially for views into the site from the A40. The provision of allotments and community orchards (p.10) is to be commended but they will need to be appropriately sited and the allotments well screened, possibly by the orchards, in order to preserve the parkland character. Similar care will need to be taken with the siting of the play area.
- Mention is made of the housing making the most of views out of the site (pages 9, 15 and 21). The priority, rather, should be the screening of the development from the views into the site, so that the effect of the development on the special landscape of the Park is minimised. While the Development Brief proposes 3.7ha housing compared to the 7ha of housing in the rejected application 09/03405/OUT, it should be pointed out that this will nonetheless be a significant extension north and westwards of the existing limits of housing development formed by properties on Martell Way and Dan y Gollen. We consider that careful screening by tree planting should be specified to mitigate the effects on views from the A40 and from the hillside slopes across the Usk Valley. In the Inspector's report mentioned above, the fact that the landscape and visual impact of that proposed development would be contrary to the statutory purpose of conserving and enhancing the natural beauty and cultural heritage of the Park was given as one of the main reasons for recommending the dismissal of the appeal (paragraphs 247-257 of the report).
- Lighting: it is suggested that there should not be overlighting of the public realm and streets (page 11). We question whether there is a need for any permanent lighting in what will be quiet lanes and streets, away from the main road. This development could be an exemplar in the Park for developments to dispense with street lighting as have many villages in other parts of the UK (e.g. the Cotswolds). This would reduce light pollution, save energy and be beneficial to wildlife.
- It is noted that the Parkland Edge is to be kept free of cars. However, it is not clear from the illustrative layout which way the buildings in the Parkland Edge will be orientated and where the drives and garages (and therefore cars) mentioned on page 21 will be placed.
- No buildings should be more than 2 storeys except where existing 3 storey buildings are located (page 11, bullet point 1). The wording "should generally be 2 storeys" (page 20, The Parkland Edge, para 3) leaves open the possibility of 3 storey buildings in this area, and should be changed.
- The suggestion that up to 3 homes should be exemplars of housing design and resource efficiency within the Park is to be welcomed. However the Development Brief should make this (and the achievement of CFSH Level 6 or Passivhaus status) a definite requirement, otherwise developers are likely to avoid this suggestion to save costs. Also, why only three? The vision (page 5) was that the whole of Cwrt y Gollen should be an exemplar.
- The provision of a community shop is to be welcomed, but it would be better if it were more centrally placed if it is to achieve the desired aim of fostering community spirit with the residents of the village of Glangrwyney and the two intervening housing estates. The provision of a community shop should be made a planning obligation.

Yours faithfully,

Elizabeth Gibbs

Development and Planning Team, Brecon Beacons Park Society

Matthew Todd-Jones - Lead Forward Plans Officer – Dwr Cymru

Dear Sir/Madam,

CWRT Y GOLLEN DEVELOPMENT BRIEF CONSULTATION (MARCH 2014)

I refer to the above consultation and would like to thank you for allowing Dŵr Cymru Welsh Water (DCWW) the opportunity to respond.

I note that the proposed development of the site includes the provision of a new waste treatment works to deal with foul discharge. To enable a more detailed understanding this approach and to allow us to provide additional comments we would encourage the developer of the site to engage with DCWW to provide further information.

Notwithstanding the above, as a general principle we encourage and support development that promotes the use of SUDS, and therefore look to your Authority to ensure an appropriate design of the site that includes water efficiency and sustainable drainage proposals, in order to comply with policy 58 of the Local Development Plan.

I hope the above will assist you in the preparation of the final development brief and should you require any further information please do not hesitate to contact me.

Yours sincerely,

Matthew Todd-Jones
Lead Forward Plans Officer

Kirsty & Andy Johns - Crickhowell Estates Ltd

Dear Sirs

We write in response to the consultation on the Cwrt-y-Gollen development brief issued by Crickhowell Estates Ltd., and offer the following reflections:

- There needs to be some development, as the site is not viable or sustainable in its current situation. The upgrading of currently derelict areas is to be welcomed.
- The relatively modest scale of development (70 reduced from 200 dwellings) is less likely to swamp Glangrwyney, but then inevitably puts a question mark over the viability of the on-site community facilities unless these are made available to other local residents.
- As stated by others, Crickhowell schools are already operating to capacity, and a holistic view needs to be taken of the effect of the plans to avoid overload and consequent loss of amenity to existing residents of the Crickhowell area and those of the development alike. Assuming that the existing infrastructure can 'make do and mend' is not good enough.

- The same applies to sewage, water and other utilities, and the responsibility of the developer to include these in its costs must be made clear.
- The development is likely to bring overall economic benefit to Crickhowell and its traders, but highlights the need for more parking there, not less as currently proposed.
- Whilst the emphasis on cycling, walking and public transport provision is laudable, car transport will undoubtedly make up the vast majority of journeys. Layout and facilities of the housing, especially garaging, needs to be reconsidered in the light of this reality. Garages have the added benefit of secure outdoor storage, which will improve the visual impact of the development.
- Good points have already been made about responsibility for ongoing maintenance of public areas – this must not be left ambiguous.

With the above caveats, we support the development and its combination of housing, adjacent leisure facilities, open spaces and safe play areas.

Yours faithfully,

Kirsty & Andy Johns

Terry Flynn – Powys County Council Housing

Ryan,

Apologies that this is a day late, but I have been training all week and catching up.

However it is, from a Strategic Housing point of view not a matter that requires any deep response as our position has been made clear in other meetings.

We are cautiously receptive of the reduction in numbers over the first application and proposal and are willing to work with agents and developers to agree the mix of affordable homes according to BBNPA policy as set out in the LDP.

I would reiterate my hope that the affordable units are not concentrated in the existing barrack blocks as this would form a perceived ghetto. Also they should be a mix of home types including both apartments and houses as discussed with Rhodri recently.

Again my apologies for the delay in sending this.

Regards

Terry

Terry Flynn STB MSc CIHCM
Swyddog Tai Fforddiadwy/Affordable Housing Officer

MID WALES

18 April 2014 Last updated at 18:51

High Court injunction stops Powys village green hearing

A bid to turn eight-acres of fields in Brecon into a village green has been stopped in its tracks.

The landowner halted the attempt to dedicate the land to public use, with a High Court injunction over a potential conflict of interest.

Locals hope to prove the plot has been used by people for more than 20 years for activities such as dog-walking and picnicking. They will now have to wait for an independent review to take place.

Residents claim Cae Prior Fields in Brecon **has long** been used by the community.

But recently the land was included in Brecon Beacons National Park's Local Development Plan (LDP) - marking it as a site for redevelopment worth "several hundred thousand pounds".

'Conflict of Interest'

In a bid to stop the land being built on, locals launched an application to register the fields as a village green. The application was lodged by Powys council's deputy chairman Paul Ashton_

But the two-day hearing due to start on Wednesday was stopped after landowner Adelaide Fellowes complained of a possible conflict of interest, as the decision would be taken by a panel of 21 county councillors - Mr Ashton's colleagues.

Mr Ashton, who is the ward councillor, said he made the application because he lived near the fields and had used them himself for the last 30 years.

He said: "The problem has arisen because although I applied for village green status as a local resident and not as a councillor, it is Powys council who decide the application.

"I realise there is a conflict of interest but I have followed the code of conduct."

A judicial review will now determine who should adjudicate the application that the land become a village green.

Edward Harris, who represents the landowner, Adelaide Fellowes, said he wants an independent inspector to consider the application rather than Powys council_

'The council has made a dog's breakfast of the situation by deciding to plough ahead without thinking of the consequences,' said Mr Harris.

'The land could be worth several hundred **thousands** of pounds if it is developed but would **be worth** much less if it is registered as a village green.'

A Powys council spokesman confirmed the local authority could not hold the hearing until after the Judicial Review. A full hearing will be held in Cardiff by the end of June.

VALE OF GRWYNEY COMMUNITY COUNCIL

RESPONSE TO CWRT-Y-GOLLEN DRAFT DEVELOPMENT BRIEF DATED JANUARY 2014

Introduction

Following the request by the Brecon Beacons National Park Authority, the Vale of Grwyney Community Council (VoGCC) has taken up the offer to make comments on the above draft development brief. Consequently the following report is a comprehensive and holistic view of the Community Council elected representatives. Prior to the development brief publication, they had also contacted the communities they serve by means of house visits and a petition (see attached). As a consequence the Community Council can confirm that these views are supported by the community as a whole.

The report addresses each page of the 26 page document and puts forward concerns, comments and finally presents an overall conclusion. However the Community Council would wish to first comment on the documents front cover.

Front Cover

This photograph is incorrect when this document was published in January 2014. The context of buildings and landscape as depicted no longer exists. Typically a number of mature trees within the site and along its boundaries have either been thinned out or completely removed. Moreover a number of former structures, some of which positively contributed to the landscape, have been demolished. Of particular note was the 'triangular church' believed to have been designed by the renowned architect Richard Rogers.

01- Introduction (page 1)

In essence the Introduction is correct although the Development Brief previously supplied in 2008 was for 200 + houses whilst the current brief is for a lesser number. That aside a reduction in the number of units still has a significant impact on strategy and landscape which, in the Community Council's view is still detrimental to the

community and the environment as a whole. Justification in support of the Community Council's views is clarified below. In essence, the Community Council considers that if there is a fundamental and unequivocal need for the proposed development to occur, more suitable sites spread throughout the Park Authority boundary would be a better solution rather than this glut of locating non required and unjustified dwellings on one particular site, namely Cwrt-y-Gollen. Endorsing the development brief proposal will be more akin to meeting personal gain than Community need.

02 - Background and Planning Status (pages 2 - 3)

It is recognised that the site was allocated under the approved Unitary Development Plan (UDP). However it is also particularly important to note that a recent outline planning application for 200 houses along with business/commercial buildings was refused and the subsequent appeal dismissed in July 2011 — Planning Inspectorate reference APP/P9502/A/10/2132455. The Community Council believes that the proposed development will not provide a social, economic or environmental need for the benefit of National Park Authority purposes or duties. It is more akin to opportunism than recognising there is a fundamental need to develop the Cwrt —y-Gollen site for the community good. The overall community considers development in principle, let alone to the scale envisaged, should not occur.

The grounds, both for the refusal of the initial development and subsequent dismissal of the appeal, are in the Community Council's view, equally valid to the current proposal. Should the latest proposal progress to the planning application stage, objections along the lines stated in this paper will be submitted to the Council.

Background

Reference is made here to 'previously developed land (brownfield land) defined in Planning Policy Wales Edition 6 February 2014 (PPW) at figure 4.3 as *"that which is or was occupied by a permanent structure (excluding agricultural or forestry buildings) and associated fixed surface infrastructure."* The curtilage of the development is included but this aspect incorporates particular omissions as explained in the 'Note 1' accompanying Figure 4.3.

Note 1 states: *The curtilage is defined as the area of land attached to a building. All of the land within the curtilage of the site will also be defined as previously developed. However this does not mean that the whole area of the curtilage should therefore be redeveloped. For example, where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as a hospital) the whole site should not normally be developed to the boundary of the curtilage. The local planning authority should make a judgement about site layout in this context, bearing in mind other planning considerations such as policies for the protection of open space, playing fields or development in the countryside. They should consider such factors as how the site relates to the surrounding area and requirements for on-site open space, buffer strips and landscaped areas."*

The Community Council considers that the development brief encroaches on land which should be devoid of new building and allotment use. This would then minimise development in accordance with PPW guidance and the Community Councils vision.

Site History

Cwrt-y- Gollen was originally a large estate with a mansion house, formal park land and other paraphernalia typical of such estates. Apart from Cwrt-y-Gollen curtilage itself, the estate consisted of properties and land at Llangenny and Glangrwyney. Buildings within these latter areas were so constructed and designed to take advantage of the river Grwyney which was a focal point in these settlements. During the Second World War, Cwrt-y-Gollen and its immediate estate curtilage was commandeered by the military as an army camp for the allied forces. After the war the Ministry of Defence (MOD) continued to use the immediate mansion estate (the building had by then been demolished) for training purposes. In the late 50's/early 60's, the MOD decided to make Cwrt-y-Gollen estate land as a permanent training camp. This was done under 'Crown Immunity' without the need for formal planning consent.

Cwrt-y-Gollen continued to expand throughout the 60's — 80's and at its peak reportedly employed around 100 civilians from around the Crickhowell area. In 1999 the **MOD** closed and sold a part of Cwrt-y-Gollen consisting of approximately 26 hectares. This land comprised of housing such as Martell Way, personnel

accommodation blocks, church and other relevant outbuildings. However, the MOD kept the lion's share of Cwrt-y-Gollen's curtilage and then offered the families of the original landowners to buy back the remaining land. To the Community Council's knowledge, this offer was not taken up.

03- Site Description (page 4)

The Community Council wishes to see the opening paragraph of this section clarified. Demolition of certain structures occurred post the MOD interest in this land although the document implies that this seemed to be MOD action. The MOD itself had earlier applied in 2007 for planning consent on their retained part for such structures/uses as a field hospital; weekend training centre and new headquarters for the 'Reserve Forces (TA) and Cadet Association', all of which would accommodate 500 personnel. The new headquarters has been built and is now operational. The MOD uses the new modernised training facilities inclusive of the original band school as an 'Army Recruitment Centre' with the original officer's mess accommodating RAF recruits. All of these facilities are operational 24 hours 7 days a week. Such facilities will remain operational 24/7 even if residential development is constructed in accord with the draft development brief. Given this scenario, it would be incorrect to state the land was a 'former army camp' as military operations are still occurring and there is no indication that this activity will cease in the foreseeable future.

04 -A Vision for Cwrt-y-Gollen (page 5)

This chapter refers to workshops that were organised in preparation of the original development brief relating to 200 + dwellings. It was made very clear at the time by both local residents and the Vale of Grwyney Community Council attendees that any development on this site was totally unacceptable. The residents/Community Council insisted that the land be retained as 'open parkland' reflecting the character that was present prior to the military requirements during the Second World War.

It should be noted that no workshops were offered to either local residents or Community Council prior to the preparation of the current draft development brief. Both groups are still against **ANY** development on this site as confirmed by this

report and the attached resident's petition representing 97% of the community. A statement made in connection with the original submission suggesting that the community as a whole was supportive of the proposals is incorrect and merely serves to incorrectly influence public opinion in favour of the development.

At page 5 in highlighted red type, the draft brief states:

"Cwrt-Y-Gollen will be an exemplar and sustainable part of the village of Glangrwyney that will make best use of its assets and local resources, with a strong complementary relationship to the existing communities of Crickhowell and the Vale of Grwyney."

The Community Council takes offence to such a bold statement. The above situation has already been tarnished in that Glangrwyney Cricket Club (following an incentive from the landowners) has unfortunately relocated from the centre of the village to the periphery of the community by partially using the above land. The relocation and the loss of the cricket club community facility could also become exacerbated if the anticipated gymnasium was to become available for 'Village Hall' use. This latter facility is directly within the hub of the existing settlement and re-siting further from the centre could impact on community users. Consequently one of the bullet points raised on page 5 namely *"A supportive and considerate community"* would be eroded in that the above proposals would, without doubt, impact on community residents.

05-Design objectives (Pages 6 to 16)

The opening paragraph of this section (page 6) puts forward 5 key headings. These headings and contents are analysed below and are supplemented with other information that the Community Council considers relevant:

If the development principle has to be established on this site **against** the will of the local community; any housing should be limited and blend in with the existing dwellings at the adjoining Dan- y-Gollen residential site. Development occurred here approximately 10 years ago following extensive consultation between the Brecon

Beacons National Park Authority and local community. The scheme replaced 36 prefabricated houses with 36 modern properties and the completed development is considered an asset to the village. Unfortunately, as will be addressed below, the draft development brief proposals will fall short of such an accolade and could in fact contribute to the erosion of the environment as a whole.

Access and Movement

The objectives advocated within the development brief at page 7 seem, at first glance, admirable. However, the principle of development is flawed in that 'access and movement' within and approaching the site will be directly affected by flooding. The Environment Agency's plans clearly show that the A40 primary network road serving the site along with access within the site lie within Flood Plain 2 and 3 zones. This will impact not only on residents leaving or entering the site but also accessibility for emergency and refuse vehicles. It is worth noting that some properties in the vicinity of the proposed development have either been refused building's insurance or have had special conditions imposed due to the risk of flooding.

It is considered that existing roads only should be used. No new roads should be created as this will impact on character and diminish the open landscape quality of the 'parkland'. Emergency vehicles should only use suitably upgraded existing roads and no new emergency access should be directed to the adopted highway at Dan-y-Gollen or the private road at Martell Way.

It is considered by the Community Council that the envisaged scale of the proposal would be out of accord with the settlement pattern in the locality. With particular regard to access and movement, the existence of more traffic entering and exiting the A40 Trunk Road would be detrimental to the impact that local residents should endure. It is too great a step to enfold and if development has to occur, it should be significantly less by only utilising existing buildings.

Character

The Community Council consider that the **only** new development that should occur strictly uses the area available within the fabric of existing 'building envelopes' and

any existing hard landscape areas ancillary to these structures. The latter would include established parking areas or footpath routes to individual standing buildings. Those structures which have already been demolished and only have concrete foundations/footprints remaining should, along with any grassed areas **not be developed**. By taking this approach it will limit the size of the development to the previously developed part of the parkland and protect the remaining portion of parkland from development.

With regard to the development brief bullet points, the Community Council's views are as follows:

- There should be no encroachment onto parkland or any existing grassed area.
- Development densities can be controlled by development only occurring by using the footprint of existing standing structures. No new development should take place on those current areas which indicate the remnants of demolished structures. Utilising existing buildings will also have the advantage of minimising the need for new infrastructure as these established facilities such as electricity/telephone/water/sewerage connections can be re-used.
- Any new dwellings constructed within the above criteria should only be two storeys with ancillary garaging being single storey in keeping with Dan-y-Gollen. If the brief identifies the re-use (as opposed to rebuild) of existing three storey structures on site; the rebuild should ensure such 3 storey structures fit into the landscape. This can be established if axonometric pictorial drawings accompanied any revised development brief. In particular, views into the site from outside vantage points such as the dram road between Gilwern and Llangattock would be of immense benefit.
- Although the Community Council support the initiative of allotments and children's play areas, such facilities should be located within the curtilages of existing buildings and not located in the open parkland setting. The provision of play equipment, linear or rectangular allotments along with the inevitable array of garden sheds would create a dramatic eyesore to the area particularly in the foreground when viewed from the A40 and vantage points.

- If development does occur in general accordance with the development brief, the allocation of the 'parkland' in future Development Plans should remain in perpetuity. A new title should be established for the designated 'parkland' and a specific covenant included restricting development of any kind within the area covered by the title in perpetuity. It should also stipulate a requirement to maintain it to a standard suitable for the purposes for which it is intended.

As echoed above, no development should occur. If this vision cannot be reached, then minimal development only should occur. Re-utilising existing 'building envelopes' will ensure the National Park status is retained and there is no damage to the immediate setting or the Park landscape as a whole.

Land Use Principles

- Although a number of these principles seem acceptable, the Community Council is against the scale of the development as stated above and below. That aside, if a portion of the site is to be primarily set aside for B1 use (Business), this might be preferable to C2 (Residential Use) as occupants of a nursing home for example could be significantly effected by noise from the nearby firing range currently operational. That noise impact could effect residents of the dwellings as well and therefore the suggestion in the brief (page 15 — Design and Considerations) must be fully integrated into the development before planning consent is granted to any type of residential scheme. Mock battles using blank bullets/thunder flashes in the nearby woodland will still continue and this noise impact has not been addressed in the development brief. The brief **MUST** holistically address not only what is within the brief area alone but also MOD activities outside the brief area and extant planning consent for the anticipated new firing range. Only then should the 'development brief continue to full public consideration.
- Although a small Class A1 shop could be of benefit, the Community Council has some concerns. Due to its location some distance from the proposed housing and the existing village, probably local residents will drive to the location whilst other footfall will be via motorists along the A40 Trunk Road. This location could necessitate significant traffic movements on and off the

trunk road and will require suitable off street parking. It is also important to note that the proposed shop will be within the flood zone. These issues need to be fully considered taking in to account the effect it could have on the existing established food outlets in nearby Crickhowell. Also, if the site becomes 'a shop use', the possible future potential of a larger supermarket could significantly affect all communities as such a shop would not be anchored to any settlement centre.

- The report makes reference to the 'Parkland' being set aside for water attenuation/foul drainage treatment/sports use. Firstly regarding foul sewage, Planning Policy Wales Edition 6 February 2014 states at paragraph 12.4.2 that *"Development proposals in sewerred areas must connect to the main sewer, and it will be necessary for developers to demonstrate to local planning authorities that their proposal site can connect to the nearest main sewer"* This has not been demonstrated in the brief. Moreover, earlier in the report reference is made to 'allotments' which will also be using the Parkland area. Clarification as to the exact position of all these facilities should be provided.
- Even with the reduced number of dwellings, it is anticipated that there will be a significant increase in the number of vehicles, possibly in the region of 200 +. This, together with the fact that both Crickhowell and Abergavenny are not within walking distances could result in a significant increase in the movement of vehicles on what is already a narrow stretch of the A40. Overall, it is believed that the site coupled with the surrounding area is not capable of sustaining a substantial increase in neither population nor vehicular traffic flow.

Although the next page (page 11) of the development brief refers to Community Safety; the Community Council considers this aspect along with other sub sections such as environmental sustainability, public realm, trees and such like to be sub topics of the overarching principles — **Key Design Considerations** - on page 15. Consequently, the Community Council put forward at Annex A their concepts of what makes a good building prior to addressing these other issues presented in the development brief.

Annex A - Community Council View on Design Principles

In considering the 'design principles' of this site, the Community Council initially addressed the criteria embodied in the book "What makes a good building? — an inquiry by the Royal Fine Art Commission." (BAS Printers Ltd, 1996 — ISBN0952332108).

Within this document 6 criteria are presented and the following provides a critique as to the approach that should be adopted in considering 'good design'.

- **Order and Unity** — this in essence requires the observer to see with greater readiness the development as being coherent and making it intelligible.
- **Expression** — this refers to the function of the building making the viewer recognise the building for what it is. The elements within the structures such as openings coupled with the combination of the structures against their individual private space around such buildings helps to provide reassurance of the overall buildings purposes.
- **Integrity** - this relates to honesty in the constructional requirements of the building techniques
- **Plan and Section** — This concerns itself with the buildings as a whole and the need to take into consideration not only the elevations but also their plans and sections
- **Detail** — This seeks the answer as to whether the detail or ornamentation is intrinsic or merely added and whether the quality of the Plans and Sections, have been carried through to the detail.
- **Integration** — This prompts the questions "whether the buildings fit into the surroundings?" and "what qualities do the buildings need to fit into the surroundings?" To meet this latter principle, six qualities are needed namely
 - siting,
 - massing,
 - scale,
 - proportion,
 - rhythm

— materials.

The siting of the buildings needs to fit into the grain of the settlement. The Community Council believe that the development fails at this first hurdle. Cwrt-y-Gollen site was formerly the setting of a mansion within parkland. It is unconnected physically to the village. It is in essence development within the open countryside with no relation to the site's initial residential use.

Regarding massing which is the three dimensional disposition of different parts of the buildings including height, bulk and silhouette, this aspect cannot be fully addressed at this stage as details are not present in the development brief. However, a simple exercise of axonometric plans being produced could significantly assist in the public understanding of the proposed development.

Scale is relative to the human being and to other buildings. Again this would be better understood if axonometric plans were provided.

Proportion relates to one part of a building with another part and the whole. Axonometric plan submission would provide a direction for public scrutiny as to the validity of the brief.

Rhythm is the arrangement and size of the constituent parts of facades. The Community Council appreciate that such details at this stage may not be essential although an indication of the domestic/business/commercial rhythm could be gleaned from axonometric plans.

Materials are an important aspect of integration and the Community Council would support materials which are sustainable and locally sourced. Traditional building techniques coupled with high energy efficiency will meet the long term aspirations of Policy and Government guidance without prejudice to visual amenity.

Community Safety

In essence this section is in line with government guidance and Tan 12 - Design. However, the comments put forward in Annex A above also need consideration.

Environmental Sustainability

The Community Council supports the principles of the three core elements mentioned in this section. However, there are elements in the subsections that are of concern and contrary to Planning Policy Wales.

1. Achieving Efficient use and Protection of Natural Resources

- As mentioned above, PPW requires wherever possible, connection to the mains sewerage system and the reasoning why this has been ignored has not been demonstrated in the development brief.
- Development is not located outside the footprint of existing buildings. Access to the site is of particular importance and lies within Flood Zones 2 and 3.

2. Enhancing Biodiversity

The Community Council has no issue with this item

3. Designing for Change

The Community Council supports the notion of live/work units and the overall ideals put in this sub section. Although it would be desirable to re-use existing buildings, this should only occur if they positively contribute to the setting. Some of the buildings on site are alien to the character of the overall national Park. They remain ubiquitous military structures and should not dictate the principle of directing 'good design' at Cwrt-y-Gollen or anywhere else. However, possibly suitable ifacadism' might work — that will depend upon the final details.

Public Realm

The Community Council supports these principles if development occurs.

concept of using such land for military purposes may well have been resisted. Consequently today's local residents would have enjoyed the formal parkland setting of Cwrt-y-Gollen.

07 — Illustrative Layout (page 18)

It is appreciated that the illustrative layout is only one possibility. The Community Council's comments above provide another opportunity more in keeping with the locality. Whatever is the final version of the development brief, this should be accompanied by axonometric plans that provide a relatively simple process for interested parties to visualise the finished development. One dimensional plans are not sufficient.

08- Drivers for Design & Development Character (pages 19 - 22)

The development character of the site should be shaped by what it was really intended for — namely Parkland. This feature should be the driving stimulus for design and not alien MOD buildings. Supporting that latter concept will certainly result in the site **not** being a contemporary 'showcase'.

The subsections relating to **Village Green; Parkland Edge; the Green Corridor; the Employment Courtyard; the Parkland** are all very commendable if this development brief is agreed. The Community Council firmly believe that their solution as expressed above would be a significant and lasting approach to ensuring the National Park statutory purposes are retained.

09 — Community Benefits (page 24)

Although the 13 point community benefits are admirable, the Community Council consider that Vale of Grwyney residents will not directly benefit from development being approved at the above site. There is a need for the developer to address other community benefits for the locality including off street parking, connection of the Glangrwyney village as existing to main sewerage, further play areas and maintenance of existing, village halls and supporting Llanbedr School. Discussions should arise with the Community Council to address these particular issues if development occurs.

Coupled with this, the developer should also recognise that they will be obliged to consider the final requirements of the Planning Obligation Strategy incorporating the Community Infrastructure Levy sent out for consultation in March 2014.

It is accepted that there is a legal requirement for either 30% affordable housing or a commuted sum to be paid by the developer. The Community Council questions the need for affordable housing in the Cwrt-y-Gollen site and, hence, if development on this site is to proceed without affordable housing, the commuted sum associated with it should be allocated to an area which has already been identified as having affordable housing needs.

This would meet the criteria identified in the adopted **Local Development Plan (LDP) Objectives SE2 Affordable Housing** "*To ensure that good quality, affordable housing of all types will be accessible to the Park's communities where there is an identified need*"

Crickhowell has the entire infrastructure in place including shops, post office, doctors' surgery all within walking distance eliminating the use of the motor car, meeting the requirements in **Planning Policy Wales 6 February 2014 section 8.1.4** below:
"Land use planning can help to achieve the Welsh Government's objectives for transport through:

- reducing the need to travel, especially by private car, by locating development where there is good access by public transport, walking and cycling"*

Sites in Crickhowell have already been identified in the adopted Local Development Plan and should be used for this purpose.

The firing range cannot be construed as a 'community benefit'. It is perceived as a 'Community nuisance' along with offsite training in the nearby woodland.

3. If development does occur, details of the scheme via an updated development brief should be re-circulated for public scrutiny. The revised development brief should at the minimum be accompanied by axonometric plans taken from public vantage points. Development should be kept to a minimum and only use existing standing structures, roadways and footpaths as opposed to the footprints of demolished buildings.

4. The park land should be devoid of structures such as allotments and other domestic paraphernalia, for example, play equipment. The Parkland should remain as parkland in perpetuity even if the revised development brief is eventually endorsed.

5. The scale of community benefits should be extended and Community Infrastructure Levy imposed

6. If the underlying purpose of the proposed development is to fulfil a genuine social, economic or environmental need, a significant amount of additional work is needed by the developers to demonstrate to the community that:

- The proposal will genuinely fulfil such needs
- There is no damage to the character of the surrounding areas
- The surrounding areas are capable of sustaining a substantial increase in population and traffic
- Other more suitable sites that are perhaps closer to or part of an existing town or village have been considered
- There will be no adverse impact to existing residents in a variety of matters such as traffic congestion, safety and such like

