SD28

Local Development Plan

DRAFT PREFERRED STRATEGY

Regulation 15 Statement of Consultation

FEBRUARY 2009

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1.0 INTRODUCTION

1.1 In November 2007, Blaenau Gwent County Borough Council issued for public consultation the Local Development Plan (LDP) Draft Preferred Strategy. The Draft Preferred Strategy was formulated following engagement with Specific and General Consultation Bodies throughout 2007.

1.2 The Draft Preferred Strategy was approved at an Executive meeting on 15th October 2008. The Draft Preferred Strategy was published for public consultation for six weeks from Friday 7th November 2008 until Friday 19th December 2008.

1.3 The purpose of this report is to provide a record of the consultation undertaken and a summary of the representations received to the Draft Preferred Strategy. Section 2 of this report includes information on the consultation and publicity undertaken during the consultation period and a list of those individuals and organisations consulted. Section 3 summarises the nature of comments received.

1.4 The aim of this document is not to provide a detailed breakdown of every representation received, but to provide a summary of the main issues raised in the representations.

1.5 This document has been prepared in accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulation 2005 and the guidance contained in section B6 of the Local Development Plan Manual (June 2006).

2.0 RECORD OF CONSULTATION

2.1 The consultation carried out on the Preferred Strategy and accompanying documents followed the requirements of the Council's approved Delivery Agreement.

Consultation

2.2 The package of documents published on the 7th November 2008 comprised:

- Draft Preferred Strategy
- Initial Sustainability Appraisal Report
- Candidate Site Register
- Habitat Regulation Assessment
- Population and Housing Background Paper
- Employment Background Paper
- Draft Preferred Strategy Representation Form
- Initial Sustainability Appraisal Representation Form
- Draft Preferred Strategy Summary Leaflet
- Summary Leaflet Comment Form
- Notification of Interest Form
- Consultation Letters

2.3 A CD with electronic copies of the above documents were sent to the Specific Consultation Bodies listed in Appendix 1.

2.4 Copies of the published documents were hand-delivered to the Planning Division of the Welsh Assembly Government on Friday 7th November 2008.

2.5 Notification letters (Appendix 2 (a-c)) and a Draft Preferred Strategy Summary Leaflet and a Comment Form were sent to approximately 500 different contacts on the Council's LDP database. This included General, Other and Government Consultation Bodies and members of the public. The consultation list is contained in Appendix 3. E-mail notification was also sent to all staff of Blaenau Gwent County Borough Council.

Publicity and Participation

2.6 The package of Preferred Strategy documents was published on the council's website on 7th November 2008. The website also contained advice on where and when paper copies of the documents could be inspected and details of public exhibitions. There was a direct link from the Council's home page to the Draft Preferred Strategy throughout the consultation period.

2.7 Public notices were placed in the Gwent Gazette on the 5th November and 12th November 2008. A copy of the public notice is contained in Appendix 4.

2.8 A Press Release was also placed in the Gwent Gazette and a letter regarding the consultation of the Preferred Strategy was also published on 3rd December 2008. A press article was also placed in the October edition of the Blaenau Gwent community magazine 'Connect' which is delivered to every household in the Borough.

2.9 During the consultation period, exhibitions were also held in every ward across the County Borough. Appendix 5 details the dates, times and venues of the exhibitions held. Posters advertising the exhibitions (Appendix 6 (a&b)) were placed in the venue prior to the exhibition and within the ward on lampposts and in local shops. A list of where the posters were displayed in each ward is contained in Appendix 7. The aim

was to engage with local people and raise public awareness / stimulate interest in the Preferred Strategy in the local community.

Preferred Strategy Exhibition at Swffryd Community Centre

Preferred Strategy Exhibition at Ebbw Vale Tesco

2.10 Council officers gave presentations to a number of organisations including the Youth Forum and the Access for All Forum. An interview was also undertaken with the Development Plans Manager and Brynmawr Radio FM on the Preferred Strategy.

2.11 Particular care was taken to ensure that the hard to reach groups identified in the LDP Delivery Agreement were involved in the process. Notification letters and summary leaflets were sent to the groups, as well as presentations given and particular groups were targeted through the location of exhibitions.

Availability

2.12 The published Preferred Strategy documents were placed for inspection in the Civic Centre – Ebbw Vale, the Business Resource – Tredegar, and the Blaina District Office (Planning Control Office). Copies were also available for inspection at all 6 local libraries and 34 outreach venues.

2.13 The Preferred Strategy documents were placed on the Council's Website for inspection/ downloading and were available throughout the consultation process. The Website contained full details of the Preferred Strategy consultation including information on exhibitions, links to related LDP documents and advice on how to make representations. During the consultation period the web page was accessed on more than 500 separate occasions.

Local Development Plan Consultation – Web Page

3.0 SUMMARY OF REPRESENTATIONS

3.01 People were requested to make representations in respect of the Preferred Strategy to the Council in writing. To assist consultees in the Pre-Deposit Consultation, three representation forms were used i.e. one formal and one informal representation form, and one representation form for the Initial Sustainability Appraisal Report.

3.02 In total 414 representations from 58 respondents were received in respect of the Preferred Strategy. 278 of the total representations offered comment, 136 were expressing support. The following section of the report summarises the nature of the comments received.

3.03 Comments are grouped under subject headings in order of their appearance in the comment form and an indication of the number of comments received in relation to each topic heading is also given. Those representations that were made to the Initial Sustainability Appraisal Report will be detailed in a separate report.

3.1 SPATIAL PROFILE OF THE BOROUGH

The first question of the comment form asked if the respondents agreed with the spatial profile and challenges identified in chapter 2 of the Preferred Strategy document. Of the 28 who responded to the question, 82% agreed, 11% disagreed and 7% was unsure.

Comments In Support

8 comments were made in support of spatial profile and challenges identified: -

- 4 comments fully agreed with the spatial profile and challenges identified.
- 1 comment welcomed the reference made to coal mining.
- 1 comment supported the designation of additional Local Nature Reserves and new SINCs, and welcomed their inclusion in the LDP.
- 1 comment considered that the explanation of why the 3 valley areas have been divided into 4 following a functional analysis is useful.
- 1 comment welcomed the identification of the environmental characteristics of the Borough.

Comments

20 comments were made regarding the detail of the spatial profile and the challenges identified: -

- 2 comments noted that the low use of public transport is inherently linked to service provision, in terms of frequency, coverage and reliability. It is highlighted that delivering integrated and sustainable transport is the real challenge.
- 2 comments highlighted the need for innovative thinking to identify opportunities to make better use and more effective use of existing land resources, which could be achieved through rationalisation, reconfiguration and or redevelopment of existing sites.
- 1 comment reflected that there is no mention of the archaeological sites and historic assets of the County Borough that currently are not statutorily protected.
- 1 comment suggested an addition to paragraph 2.39 to read 'the biodiversity of the country is distinctive and forms an important part of Blaenau Gwent's heritage. Conserving biodiversity is an important part of sustainable development'.
- 1 comment asked for Gwent Wildlife Trust's part ownership and management of Silent Valley Local Nature Reserve to be acknowledged.
- 1 comment identified a further challenge, as identified in paragraph 2.64 is the need to manage ecological assets appropriately.
- 1 comment considered that the information provided in the environmental characteristics section should be complemented with any available data regarding the condition of designated sites (of various types). If such information is not available, it is suggested that this should be stated.
- 1 comment highlighted that there is an error in paragraph 2.41, the correct name of the Site of Special Historic Interest (SSSI) is Cwm Merddog Woodlands.
- 1 comment reflected that Blaenau Gwent has a geological SSSI, Brynmawr Sections, highlighting the importance of the area for geodiversity.
- 1 comment highlighted the importance of biodiversity and how a landscape rich in biodiversity will help to alleviate the impacts of climate change.
- 1 comment considered that as well as statutory and non-statutory wildlife sites, the Borough supports a rich diversity of species many of which are protected either through statutory designations (British and European) or non-statutory designations (UKBAP / LBAP priority species).
- 1 comment reflected that the 5 candidate Local Nature Reserves – Parc Bryn Bach, Cwmtillery Lakes, Beaufort Hills, Parc Nant-y-Waun and Sirhowy Woodlands are due to be designated in 2009.

- 1 comment highlighted that the candidate SINCs in paragraph 2.44 are to be designated in 2009.
- 1 comment considered that Figure 2 – Map of Wildlife Sites should list the sites, possibly in an appendix format.
- 1 comment considered that greater linkages between accessibility, including access to green space, recreation and health should be identified as a challenge.
- 1 comment recognised that an additional challenge for the emerging LDP would be to "address the environmental legacy of former industrial processes including mining".
- 1 comment noted that Festival Park and its gardens are not referred to in the strategy document.
- 1 comment highlighted that no information has been provided with regard to the differences between Ebbw Vale, Tredegar, Abertillery and Nantyglo and Blaina settlements which could be a useful starting point when formulating planning policy guidance.

3.2 POLICY CONTEXT

The second question of the comment form asked if the respondents agreed with the policy framework set out in chapter 3 of the Preferred Strategy document. Of the 29 respondents 86% agreed, 10% disagreed, and 4% was unsure.

Comments in Support

7 comments were made in support of the policy framework set out chapter 3: -

- 3 comments agreed with the policy framework.
- 1 comment welcomed the reference to national planning policies in paragraph 3.13.
- 1 comment welcomed the inclusion of the LBAP within the policy context.
- 1 comment acknowledged that the Preferred Strategy aims to prove the national, regional and local context for the LDP and refers to a number of key relevant plans, policies and strategies.
- 1 comment acknowledged that the Preferred Strategy appears to provide a good fit both with the Wales Spatial Plan vision for South East Wales and the area work.

Comments

20 comments were made regarding the detail of the policy framework set out in chapter 3: -

- 5 comments reflected that there is little mention of the role of Blaenau Gwent within the networked city region and there is little mention of Blaenau Gwent's interface/ collaboration with its neighbouring Local Planning Authorities.
- 1 comment suggested that evidence should be provided on the areas of joint working identified both within the authority and external organisations.
- 1 comment questioned how the strategy accords with other regional policy objectives, particularly regarding travel reduction, support of the knowledge based sectors and development of a thriving European Capital in South East Wales.
- 1 comment noted that the evidence base is incomplete, although the timing information is helpful. It should be ensured that appropriate evidence is available and its influence in developing and supporting the strategy is clear, including if studies arrive at differing conclusions from those that have formed the basis for the draft Preferred Strategy.
- 1 comment reflected that no leisure related strategies are referred to in support of the Preferred Strategy.
- 1 comment suggested that it should be noted that some parts of the Community Plan are undergoing revision at this time.
- 1 comment suggested a wording amendment in paragraph 3.11 to read the "main elements will be: protecting wildlife areas including river habitats and linking up to create wildlife corridors."
- 1 comment referred to the Environment Strategy for Wales in paragraph 3.11 and considers that the following statement should be included 'sites of International, Welsh and local importance are in favourable condition to support the species and habitats for which they have been identified.'
- 1 comment considered that although the delivery of the Networked Environment Region is a sufficient objective for the South East Region, it is not the only one. Additional aims include; safeguarding and enhancing the countryside and environmentally sensitive areas; identifying opportunities to restore and create sites which will enhance biodiversity; reducing congestion, and developing public transport and safe walking and cycling routes; and maximising opportunities provided by living in close proximity to the countryside.

- 1 comment highlighted that there is no mention of the concept of the Valleys Regional Park in section 3.0, although it is referred to later in the document, the concept should be explained in section 3.0.
- 1 comment considered that it may be useful to include the vision of the LBAP.
- 1 comment suggested that NERC Act 2006, and biodiversity duty should be acknowledged in the Preferred Strategy.
- 1 comment considered that biodiversity should feature as a key element in the Heads of the Valley programme.
- 1 comment considered that the register of listed buildings 'at risk' is not produced by Cadw but is the responsibility of the local authority.
- 1 comment considered that the housing apportionment does not set out a coherent strategy for which its policies and allocations flow. It is recommended that reference to the apportionment is removed and house-building allocations are re-evaluated to ensure that they are consistent with a realistic development strategy for South East Wales.
- 1 comment objected to the statement within paragraph 3.20 which states that the Home Builders Federation has agreed to the figures within the regional apportionment exercise.

3.3 CHOICE OF PREFERRED STRATEGY (OPTION 2)

Question 3a of the comment form asked if the respondents broadly agreed with the choice of the Preferred Strategy. Of the 45 respondents, 80% agreed, 15% disagreed and 5% was unsure.

Comments in Support

None

Comments

6 comments were made to the choice of Preferred Strategy: -

- 1 comment suggested the amendment of wording of the town centre issues in paragraph 4.3 to read "to find a sustainable role / function for town centres; encourage multiple retailers and a mix of sustainable uses within the town centres".
- 1 comment suggested the amendment of the wording of the environment issue in paragraph 4.3 to read, "to protect and enhance the townscape and landscape in the face of competing development uses".
- 1 comment reflected that environmental issues are not addressed in this section and noted that all of the strategic options are predicted to have negative effects on biodiversity, greenhouse gas emissions, air, water quality, and landscape. This is not sufficiently addressed.
- 1 comment considered that option 2 house building allocation lacks adequate justification.
- 1 comment highlighted that option 2 house building allocation is not compatible with development goals in neighbouring authorities. No formal reference to a regional strategy for South East Wales is included.
- 1 comment considered that option 2 is not the most sustainable in terms of the core Strategic Environmental Assessment objectives. Whilst it is noted that a number of measures and changes are proposed to mitigate the negative elements, it is considered that the requirements of the SA/SEA report will only be met where the spatial strategy includes a green infrastructure network, reduces the need to travel and prioritise the use of brownfield land.

3.4 LEVEL OF POPULATION GROWTH

The fourth question (question 3b) asked respondents if the level of growth identified in paragraph 4.25 is appropriate. Of the 42 respondents, 74% agreed, 14% disagreed and 12% was unsure.

Comments in Support

9 comments were made in support of the level of population growth: -

- 8 comments agreed that the level of population growth seemed appropriate.
- 1 comment supported the aim to stem declining population levels and increase them to levels that support sustainable communities.

Comments

21 comments were made to the level of population growth: -

- 2 comments supported the level of population growth, but considered in seeking to achieve this level of growth, a flexible approach must be adopted when allocating sites for housing to ensure a range of house types and tenures are available.
- 1 comment highlighted that there is more potential in the Ebbw Fach Valley than has been identified for good quality housing on brownfield sites especially in the Abertillery area and this should be investigated further.
- 1 comment highlighted that the Lower Ebbw Fach Valley is the area with the biggest problem with a shortage of 3 bedroom homes, yet in the draft Preferred Strategy the least number of proposed houses to be built.
- 1 comment reflected that the figures for housing seem to be at odds with the current Unitary Development Plan.
- 1 comment recognised that there is no mention of sheltered housing or public owned housing and if they have been included what percentage is private housing.
- 1 comment identified that there was no mention of care homes / supported living.
- 1 comment raised concerns about the ability to deliver the step change in housing growth.
- 1 comment considered that as well as back loading the building rate of new houses, a phased approach to the release of land for housing over the plan period should be adopted.
- 1 comment suggested that the housing requirement figure should be reviewed in a local and regional context so that it is clearly based on robust evidence.
- 1 comment considered that the levels of population growth set might be too ambitious to be delivered, particularly during the first four or five years of the plan period, given the current economic climate.
- 1 comment considered that it might be more pertinent to pursue the level of growth identified for option 3.
- 1 comment supported the level of population growth but considered that the level of growth should be informed by one of the aims of Option 3 to ‘spread the growth more evenly across the County Borough.’
- 1 comment recommended that population projections for Blaenau Gwent require greater scrutiny. Four years of data is considered an inadequate measure of possible trend shifts.
- 1 comment questioned the population growth given the current economic climate.
- 1 comment considered that it would be useful to identify the numbers in education too.
- 1 comment considered that the level of population should be doubled, as a minimum to protect school spaces.

- 1 comment stated that the last known population figures are falling, hopefully the new campus in Ebbw Vale will attract people to Blaenau Gwent, but the train may mean people will not actually live in Blaenau Gwent but travel every day.
- 1 comment objected to the high level of growth as there are concerns that Blaenau Gwent does not have the environmental capacity to support such development. A more moderate approach is recommended.
- 1 comment stated that people will not want to settle in the Ebbw Fach Valley, especially because there are no amenities as such and local travel is poor.
- 1 comment expressed that businesses should be attracted to the area and suggested that perhaps business start up rates should be cut to attract businesses.

3.5 EMPLOYMENT

The fifth question (question 3c) asked respondents if the proposed approach to employment is the right one. Of the 41 respondents, 76% agreed, 7% disagreed and 17% was unsure.

Comments in Support

8 comments were made in support of the approach to employment: -

- 5 comments agreed with the need to diversify the economy.
- 1 comment broadly agreed with the approach to employment.
- 1 comment agreed that the proposed approach to employment was right for Ebbw Vale.
- 1 comment agreed that the employment sites at the main settlements should be retained and consolidated.

Comments

16 comments were made to the detail of the approach to employment: -

- 3 comments reflected that the Employment aim of the strategy to 'develop manufacturing' is flawed. New and innovative ways of promoting investment in the County Borough should be sought given the current economic climate.
- 2 comments considered that the approach to employment was too broad and needs to be more specific.
- 1 comment identified that there is no mention of training needs.
- 1 comment questioned the need for new workshops as there are so many empty at present.
- 1 comment questioned if housing and industry must continue to be separate.
- 1 comment raised concerns about the level of land proposed to be allocated for employment use.
- 1 comment suggested a phased approach to the development of employment land.
- 1 comment considered that the employment study undertaken by URS does not identify the release of existing employment sites.
- 1 comment proposed the need for a vision for the Ebbw Fach Valley with a forward-looking economy, based on green energy and an enhanced tourist-based economy where possible.
- 1 comment suggested that jobs should be created via the creation of small-scale sustainable energy businesses.
- 1 comment expressed disappointment that Blaenau Gwent County Borough Council had been so unsupportive of the Ministry of Justice's search for a site for a new prison. It is considered that the land at Bryn Serth is an ideal site for such a use and would bring much-needed jobs to the County Borough.
- 1 comment considered that to diversify the employment base, the retail, leisure and tourism sectors would have a significant role to play in attaining this, as will the promotion of strategic mixed-use development opportunities.
- 1 comment reflected that there is a need for employment for disabled people in Blaenau Gwent.

3.6 TOWN CENTRES

The sixth question (question 3d) asked respondents if the proposed approach to the town centre is the right one. Of the 41 respondents, 76% agreed, 12% disagreed and 12% was unsure.

Comments in Support

8 comments were made in support of the approach to the Town Centres: -

- 6 comments supported the proposed approach to the town centres.
- 1 comment recognised the potential offered by Ebbw Vale work's site.
- 1 comment welcomed the inclusion of Blaina as a district/local shopping centre.

Comments

12 comments were made to the approach to the Town Centres: -

- 2 comments stated that Abertillery Town Centre needs to have a viable future and the danger in the strategy is that the (over?) development in Ebbw Vale will be detrimental to it and the other towns, unless a new future niche market in addition to servicing local needs is proposed and found for those. This should be part of a master plan for Abertillery and the Ebbw Fach Valley.
- 2 comments reflected that no one town should suffer because of development of another. Caerphilly has developed Blackwood, Bargoed and Caerphilly itself and every town has benefited.
- 2 comments considered that if Abertillery cannot attract larger stores to its Town Centre it will be at danger of further loss of smaller shops.
- 1 comment considered that the proposed approach to the town centres is too vague.
- 1 comment considered that there was too much emphasis on the hierarchy of the towns and considered that all population areas need a basic range of shopping facilities – smaller shops rather than big supermarkets.
- 1 comment took the view that Blaina will not gain at all and expressed that only the residents of the town use it and cannot think of any way to improve it.
- 1 comment expressed concerns that Abertillery and other designated town centres will become 'dormitory' towns, more so than already.
- 1 considered that it is not only the town centre of Ebbw Vale that will provide the regional hub function – of equal importance are The Works and Festival Park. These three key areas of Ebbw Vale could function together to deliver prosperity and growth and should be recognised in the LDP.
- 1 comment considered that town centres should be updated to encourage more shops into the area, otherwise out of town developments will 'take over'.

3.7 VISION

Question 4 asked respondents if they agreed with the Vision. Of the 25 who responded to this question, 84% agreed, 8% disagreed and 8% was unsure.

Comments in Support

7 comments were made in support of the Vision: -

- 6 comments agreed with the long-term vision for Blaenau Gwent and supported the development of Ebbw Vale as the main service and retail hub for the County Borough.
- 1 comment acknowledged that the LDP vision is clear and distinctive for the LDP; the process for arriving at it through workshops and consultation is clear.

Comments

4 comments were made to the Vision: -

- 1 comment considered that the Vision should make specific reference to Ebbw Vale's regeneration in a sustainable manner whilst aiming to protect what is highly valued about the County Borough, in terms of the environment, culture and heritage.
- 1 comment recommended the addition of words 'interconnected' and 'biodiversity' to the Vision.
- 1 comment expressed support for the opening words of the vision which recognise that the Council cannot deliver the stated objectives in isolation (rather it will be "through collaborative working…"), this could be supported by further information with regard to whom and on what the Council will collaborative would be a useful addition.
- 1 comment suggested that as well as seeking to protect and enhance Blaenau Gwent's unique environment, cultural and historic identity the vision should also seek to capitalise on it where appropriate.

3.8 OBJECTIVES

The fifth question referred to the objectives and questioned if they will deliver the Vision in a sustainable manner. 24 responded to the question, and of those who did, 83% agreed, 13% disagreed, and 4% didn't know.

Comments in Support

6 comments were made in support of the objectives: -

- 4 comments supported the objectives and agreed that the objectives will deliver the vision in a sustainable manner.
- 1 comment supported objectives 8, 10, 11 and 14.
- 1 comment supported objectives 1, 3, 4, 6, 7, 8, 9, 10, 11 and 13.

Comments Objecting

20 comments were made to the detail of the objectives: -

General comments relating to the Objectives

- 3 comments considered that in addition to Ebbw Vale Steelworks, consideration should be given to the role that other large regeneration sites in Ebbw Vale and across Blaenau Gwent can play in delivering sustainable growth and regeneration for the County Borough.
- 1 comment considered the objectives to be generic and paraphrase national policy.
- 1 comment objected to the omission of an objective to deliver sustainable development, in economic, social and environmental terms.
- 1 comment considered that the plan objectives should encompass protection and enhancement of the overall quality of the historic, natural and built environment of the County Borough.
- 1 comment raised concerns that there were no objectives "to protect, enhance and manage the County Borough's unique landscape; and to ensure the sustainable management of water resources within the County Borough."
- 1 comment considered that there should be an explicit reference in the strategic objectives to achieving a percentage target of all development on recycled previously developed land in the Borough.
- 1 comment suggested reference is made to regeneration and remediation of land previously subjected to industrial development such as mining.

Objective 2

- 1 comment considered that explicit reference for sustainable modes of transport that reduces dependency on the use of cars should be made in objective 2.

Objective 4

- 1 comment considered that some of the objectives are too general. For example how will diversification on the economic base sought under objective 4 be achieved? The objectives should be realistic and measurable with clear targets and methods.

Objective 5

- 1 comment suggested adding the words "an appropriate" after "provide" in objective 5.

Objective 7

- 1 comment considered that objective 7 should reflect that there is a need to ensure that there is an allocation of an appropriate quantity and variety of housing

sites to deliver high quality choice in sustainable locations, well served by essential facilities and accessible by a range of good transport modes.

Objective 12

- 1 comment recommended the rewording of objective 12 to read, “Protect, enhance and manage the diversify of the biodiversity resource of Blaenau Gwent through the identification of key wildlife areas and linking to form wildlife corridors.”
- 1 comment objected to the wording of objective 12 and suggested the following alternative ‘Protect, enhance and mange the biodiversity resource of Blaenau Gwent and identify, protect and increase the connectivity of ecological networks’.
- 1 comment considered that objective 12 should also explicitly identify an intention to protect, and where appropriate enhance biodiversity, including designated sites and protected species generally, and where appropriate through the design of new development/ regeneration schemes.

Objective 13

- 1 comment recommended the rewording of objective 13 to read, “Ensure the standard of design is good quality, sustainable, appropriate to its context, and will improve the quality of the physical and natural environment; and protect and enhance Blaenau Gwent’s historic and cultural environment”.
- 1 comment suggested amendments to objective 13 to include the word “maintain”.
- 1 comment recommended the clarification of objective 13 and suggested referring to incorporating existing biodiversity features into new development, and providing ecological enhancements, as well as respecting the physical and historic setting.

Objective 14

- 1 comment reflected that objective 14 should also refer to the need to adapt to the effects of climate change.

3.9 DETAIL OF THE PREFERRED STRATEGY

The sixth question referred to the detail of the Preferred Strategy. 26 responded to the question, and of those who did, 81% agreed and 12% disagreed with the detail of the Preferred Strategy, and 4% didn't know.

Comments in Support

22 comments were made in support of the detail of the Preferred Strategy: -

- 16 comments agreed with the detail of the Preferred Strategy and that Ebbw Vale should be the focus for the majority of growth in the County Borough throughout the plan period.
- 2 comments stated that the strategic policies appear to be well aligned to the objectives and the chosen strategy option; they usefully provide clear links to the objectives.
- 1 comment considered that the general approach towards flood risk is appropriate.
- 1 comment considered that the Welsh language had been suitably considered.
- 1 comment welcomed the acknowledgement that the use of Brownfield land in Ebbw Vale should be maximised.
- 1 comment reflected that there are no issues of consistency with the national planning policy requirement to conserve the best and most versatile agricultural land.

Comments

39 comments were made to the detail of the Preferred Strategy: -

Objectives

- 1 comment objected to the emphasis given to growth and regeneration, and the implementation of objectives 1-9. The Preferred Strategy is weighted towards these objectives, to the detriment of objectives 10-14, and policies regarding the enhancement of the environment.

Strategic Policies

- 1 comment considered that the recommendations made in the ISAR regarding the strategic policies have not been incorporated and the policies and accompanying explanations often do not reflect the objectives to which they relate.

Deliverability of the Preferred Strategy

- 1 comment stipulated that the deliverability of the preferred option needs greater clarification in the deposit plan. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.
- 1 comment sought clarification of the term 'regeneration' and what it means for Blaenau Gwent. Clarification of when regeneration proposals should be delivered should be provided.
- 1 comment indicated that the supporting text should be developed further in the deposit LDP to indicate delivery mechanisms and timescales for implementation, and the package of policies in the deposit plan should provide greater detail.

Location/Distribution of Development

- 5 comments disagreed with the unfair distribution of development with a disproportionate bias towards Ebbw Vale. There are concerns that this will have a detrimental effect on Abertillery and most of the Ebbw Fach Valley unless there is a clear vision with requisite actions for the Ebbw Fach Valley.
- 1 comment considered that there is too much emphasis on the former Steelworks site in Ebbw Vale.

- 1 comment stated that there needs to be a specified strategy in place with timelines and funding to develop Cwmtillery and Abertillery.
- 1 comment took the view that complementary visions need to be developed for the other towns and valleys areas in addition to Ebbw Vale.

Town Centre

- 1 comment expressed that it is not made clear in the main text why Blaina was included as a district/local shopping centre by the LDP Forum and Steering Group.
- 1 comment questioned what is meant by the term ' hubs' and if they are district and local hubs.

Environment

- 1 comment expressed that a strategic policy should be included to cover the protection, maintenance, enhancement and positive management of the natural and built heritage in the consideration of all development proposals within the rural and built environment.
- 1 comment considered that in the deposit plan a Borough wide policy should be included to cover protection and enhancement of the Borough's historic assets and their settings.
- 1 comment considered that further explanation of how the LDP responds to the effects of climate change on the County and how this will affect the strategy recommended for the deposit plan should be given. Further detail would also be expected on adaptation in order to explain further how objective 14 will be met.
- 1 comment considered that greater detail is required concerning areas where protection is essential in the plan area.

Renewable Energy

- 2 comments stated that the Preferred Strategy does not appear to have followed the approach of the MIPPS and TAN 8, and there is little consideration of the role and impact of renewable energy in the plan and it does not appear to form part of the core strategy of the plan.
- 1 comment referred to paragraph 2.58 that Blaenau Gwent uses a higher share of gas domestically than compared with the national average, and that little has been proposed to remediate this.
- 1 comment recommended that the use of generic phrases should be avoided which seek to encourage the use of energy efficiency, renewable energy and the minimisation and management of waste and pollution. Such phrases lack the detail and commitment necessary to ensure that such aspirations are achieved.
- 1 comment considered that a specific development control policy on renewable energy should be incorporated into the plan for example 'All non-residential or mixed use developments (new build, conversion, or renovation) above a threshold of 1,000m^2 will be expected to provide at least 10% of their energy requirements from on site renewable energy generation'. 'All residential developments (new build, conversion or renovation) of 10 or more units will be expected to provide at least 10% of their energy requirements from on site renewable energy generation.'

Utilities

- 1 comment referred to the statement made in the Preferred Strategy that sewerage capacity exists to support the Preferred Strategy. Evidence should be made available to support this statement.
- 1 comment considered that the deposit plan should address of the increased demand for water.

- 1 comment considered that there should be early engagement with Dwr Cymru on the deliverability of development in terms of infrastructure provision.

Sustainable Design

- 1 comment considered that an additional strategic policy is included to ensure that all residential units are designed to code for Suitable Homes Level 4 and all industrial and commercial units are built to BREEAM 'excellent' standard.
- 1 comment recommended the inclusion of a discrete policy on sustainable design and construction methods, and the introduction of minimum energy efficiency standards for extensions, change of use conversions, and refurbishments / listed building restorations.

Flood Risk

- 1 comment considered that the consideration should be given to developing strategic policies for floodplains; and development with regard to settlement boundaries.
- 1 comment recommended the addition of a separate strategic policy to address flood risk.

Leisure/Recreation

- 1 comment reflected that the provision of facilities for those visiting Blaenau Gwent is virtually non-existent.
- 1 comment considered that there are many opportunities for other outdoor pursuits (e.g. walking) that could be explored further. Mountain biking can be very damaging if managed incorrectly.

Land contamination

- 1 comment questioned whether land contamination is a significant issue in terms of delivery.

Housing

- 2 comments disagreed with the building of new homes whilst so many existing houses stand empty. Proposals are needed for dealing with current empty property.
- 1 comment considered that the quantity of housing is not supported by previous house building rates as suggested.
- 1 comment expressed that consideration should be given to broad phasing for developing housing and employment land over the plan period. It is noted that there is some indication in relation to housing; but at this stage it is not area or site specific.
- 1 comment noted that there is no detail regarding how existing housing allocations in the UDP that do not have planning permission will be considered.

3.10 STRATEGIC POLCIES (SP)

The seventh question asked if the strategic policies reflected the Preferred Strategy. 25 responded to the question, and of those who did 56% agreed, 40% disagreed and the remaining 4% didn't know. It is considered that the 40% figure does not correspond with the comments received on the strategic polices (see below), as the comments received were not extremely negative but in fact in most cases suggested minor amendments.

SP1 – Heads of the Valleys Area – Growth and Regeneration

Comments in Support

12 comments were made in support of Strategic Policy 1: -

- 5 comments supported the provisions of SP1 which identifies Brynmawr, Blaina and locations which are highly accessible to them as a focus for development.
- 4 comments welcomed the identification of Ebbw Vale as the main focus for new development under the provisions of policy SP1.
- 2 comments fully supported the strategic policy.
- 1 comment supported the identification of Tredegar as a focus for new development under the provisions of policy SP1.

Comments

4 comments were made to the detail of Strategic Policy 1: -

- 3 comments considered that Nantyglo should be identified as a focus for development in the Upper Ebbw Fach Valley and listed in policy SP1.
- 1 comment considered that placing too much emphasis on the ability of the Steelworks to deliver the majority of growth does not constitute sustainable development and other larger sites must also be considered.

SP2 – South of the Borough

Comments in Support

2 comments were made in support of Strategic Policy 2: -

- 1 comment supported the designation of Abertillery as the focus of new development and regeneration in the South of the Borough.
- 1 comment fully supported the strategic policy.

Comments

1 comment was made to the detail of Strategic Policy 2: -

- 1 comment considered that the recommendations of the ISAR have not been taken into account, which recommends specific policy regarding the need for transport infrastructure and details of the types of regeneration activity. It is recommended that this policy be amended to reflected these.

SP3 – Creating a network of sustainable linked communities to spread regeneration benefits

Comments in Support

1 comment was made in support of Strategic Policy 3: -

- 1 comment fully supported the strategic policy.

Comments

None

SP4 – Sustainable Development

Comments in Support
1 comments was made in support of Strategic Policy 4: -

- 1 comment acknowledged SP4 which gives requirements in relation to new development.

Comments
13 comments were made in relation to Strategic Policy 4: -

- 3 comments recommended that the policy also makes reference to the location of new development close to centres/ services, transport hubs etc as a means of minimising the need to travel.
- 2 comments highlighted that no reference to environmental credentials is made that would enhance the baseline of Planning Policy in Wales to achieve a minimum of code Level 3 of the code for Sustainable Homes and BREEAM very good.
- 1 comment suggested amendments to the wording of the third bullet point in SP4, to include the words “good design”.
- 1 comment expressed that policy SP4 fails to encompass the entire breadth of the sustainable development concept. It is considered that many of the suggestions made in the ISAR could be incorporated into this policy including SUDs, high quality sustainable design, and the minimisation of construction waste and pollution.
- 1 comment considered that the policy fails to capitalize on the opportunities for biodiversity protection and enhancement.
- 1 comment expressed that it is not clear in the SEA/SA report how the new policy SP4 has been assessed against SA/SEA objectives, given that this policy is one of the new proposed policies arising from the SA/SEA process.
- 1 comment considered that to provide clarity to the policy, a definition of the phrase ‘making efficient use of land’ should be provided.
- 1 comment objected to the requirement which stated that all new development will need to incorporate all the criteria in order to reduce the use of natural resources. It is considered that it may be possible to reduce the use of natural resources by incorporating energy efficiency measures for example without the need for renewable energy technologies.
- 1 comment objected that there is no specific reference to exploiting brownfield opportunities where appropriate and possible.
- 1 comment suggested that SP4 would benefit from making reference to the land being stable.

SP5 – Retail Hierarchy

Comments in Support
5 comments were made in support of Strategic Policy 5: -

- 2 comments considered that the retail strategy flows logically through the Preferred Strategy and appears reasonable.
- 2 comments supported the inclusion of Blaina as a district/local centre in policy SP5.
- 1 comment supported the position of Ebbw Vale as a principal retail centre and Brynmawr and Abertillery as district/local hubs and shopping centres in the County Borough’s retail hierarchy.

Comments
4 comments were made to the detail of Strategic Policy 5: -

- 1 comment reflected that the lack of evidence base, listed at paragraph 3.33, but not available on the website means it is difficult to assess how robust the strategy is, therefore the evidence base should provide clarity about the retail hierarchy and town centre regeneration schemes.
- 1 comment considered that a précis of the action plans mentioned in paragraph 6.7 should be provided. Given that new developments are proposed some indication of the amount of floorspace envisaged during the plan period is required for both comparison and convenience goods.
- 1 comment suggested the word 'protected' in this policy be replaced with the word 'promoted'.
- 1 comment requested that Festival Park and Gardens should be included in the retail hierarchy as a strategic location at which opportunities for leisure, cultural and tourist facilities based on consolidation of its existing retail strength should be explored.

SP6 – Employment and Diversification of the Economy

Comments in Support
5 comments were made in support of Strategic Policy 6: -

- 2 comments acknowledged that the objectives and strategic policies logically flow from the evidence in the Employment Background Paper.
- 1 comment supported the provision of 50-80 ha of land for employment and business purposes during the plan period.
- 1 comment supported the intention to deallocate some large employment sites in the northern end of the County Borough.
- 1 comment agreed with the need to diversify the economy.

Comments
11 comments were made to the detail of Strategic Policy 6: -

- 2 comments considered that paragraph 6.14 under the 'Employment' heading fails to reflect the current economic climate in which the construction industry is not growing.
- 2 comments stipulated that the Preferred Strategy does not appear to identify any strategic employment sites.
- 1 comment considered that whilst it is noted that the evidence base considers the movement of workers between Blaenau Gwent and surrounding authorities it is less clear whether discussions have taken place about neighbour authority allocations of employment strategies.
- 1 comment considered that apart from the 50-80 ha of land set aside for employment purposes, there is little detail with regard to 'general' employment.
- 1 comment considered that the supporting text of policy SP6 is quite informative with regard to tourism, but other aspects are less detailed.
- 1 comment identified that it would have been beneficial to have some indication of where the 50-80 ha of land are and what specific purpose they are to be allocated.
- 1 comment reflected that the Community Infrastructure Levy would not lend itself to the purpose stated.
- 1 comment reflected that social sectors should be exploited to create employment opportunities for Blaenau Gwent.
- 1 comment raised concerns about the delivery of the level of growth proposed ad the amount of land to be allocated in the plan.

SP7 – Development of the Tourism and Leisure Sectors

Comments in Support
2 comments were made in support of Strategic Policy 7: -

- 1 comment welcomed the encouragement of sustainable tourism.
- 1 comment fully supported the strategic policy.

Comments
1 comment was made to the detail of Strategic Policy 7: -

- 1 comment considered that SP7 needs redrafting for clarity; it appears to be very broad and general and could benefit from the addition of some of the detail from paragraph 6.10.

SP8 – Housing Provision

Comments in Support
12 comments were made in support of Strategic Policy 8: -

- 8 comments welcomed the provision of 400 dwellings in the Upper Ebbw Fach Housing Market Area.
- 2 comments welcomed the provision of 1,500 dwellings in the Ebbw Fawr Housing Market Area under the provision of SP8.
- 1 comment supported the provision of 800 dwellings in the Sirhowy Valley Housing Market Area, under the provisions of SP8.
- 1 comment agreed with the scale of provision.

Comments
15 comments were made to the detail of Strategic Policy 8: -

- 2 comments reflected that the delivery of the 1,450 dwellings on sites already committed should be reviewed to ensure they are viable and capable of development over the plan period.
- 1 comment considered that the recommendation of the ISAR that location of housing has regard for the proximity of local facilities and sustainable transport links has not been incorporated.
- 1 comment considered that there does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring authorities; nor any discussion of how any under provision and proposed 'backloading' of the housing requirement may have implication for take up of employment land allocations.
- 1 comment stated that a clarification would have been useful within the supporting text of the policy to explain the flexibility of the housing range given the economic climate.
- 1 comment considered that the figures given for the breakdown into the Housing Market Areas only reflect the higher end of the range, whilst the delivery figures in the policy, which do not reflect the range, have not been broken down into Housing Market Areas.
- 1 comment considered that the policy was too complicated and inflexible.
- 1 comment considered that there is no reference made to the potential contribution that windfall sites can make to housing land supply over the plan period.
- 1 comment raised concerns about the deliverability of the levels proposed and the number of houses to be provided over the plan period.

- 1 comment considered that policy SP8 should not include a range in terms of the housing requirement figure and should allocate a figure at the top end of the range, currently 3,000 for the plan period.
- 1 comment considered that the phasing requirement should be removed from the policy.
- 1 comment recommended the inclusion of a flexibility allowance of 10%.
- 1 considered that the reference to housing density is conspicuous by its absence and suggest that the local planning authority should be seeking to achieve an average net housing density of between 30-50 dwellings per hectare.
- 1 comment considered that small areas of land of approximately 0.5 acre needs to be identified to allow the construction of specialised properties for organisations, such as housing associations.
- 1 comment reflected that housing should be accessible and appropriate for all members of the community, where elderly homes are proposed to closed, suitable, affordable and appropriate homes must be provided to meet the needs of the elderly and disabled.

SP9 – Affordable Housing

Comments in Support
2 comments were made in support of Strategic Policy 9: -

- 2 comments fully supported the strategic policy.

Comments
9 comments were made to the detail of Strategic Policy 9: -

- 2 comments highlighted that it is unclear whether the target will be delivered by the proposed threshold of 10 units and the site target of 25%, given that about 70% of the plan's housing requirement is to be delivered on committed sites and sites of less than 10 units. Therefore the 25% target and the affordable housing site thresholds should be justified to prove that it would not have an adverse impact on development viability or it should be removed.
- 1 comment reflected that the deposit plan should include a rural exceptions policy alongside policy SP9 which sets a site quota for affordable housing.
- 1 comment questioned whether all the options for increasing the affordable housing target have been explored, for example reducing the threshold in areas of greatest need, where this is economically viable; or reviewing sites in the land supply to assess whether they are now likely to come forward or could be brought forward.
- 1 comment referred to paragraph 6.18 and that affordable housing will be delivered on a *small number of 100% affordable sites, where appropriate.* It is considered that without any precise definition / location for the small number of 100% sites, affordable housing provision is effectively restricted to the 800 new site allocations of 10 units or over, as paragraph 6.18 makes it clear that most of the 1,450 committed units are not classifiable as affordable housing.
- 1 comment expressed concern that the 600-800 affordable housing units range is rather vague and a wide spread of figures, which given that the majority will have to be found in new allocations of 800 units casts considerable doubt as to validity and deliverability of the policy.
- 1 comment considered that policy SP9 should be linked to an identifiable need for affordable housing in order to recognise the differences in the housing market and individual sites and suggested the following policy wording 'Where there is an identifiable local need for affordable housing, up to 25% of the total dwellings on sites of 10 or more dwellings should be affordable'.

- 1 comment recommended that the Local Housing Market Assessment is up to date in terms of its evidence base and is produced in partnership with private developers and other stakeholders as required by national guidance.
- 1 comment expressed that reference should be made to the needs of gypsies and travellers included in all affordable housing documents and strategies and due consideration given to them.

SP10 – Gypsy Accommodation

Comments in Support
1 comment was made in support of Strategic Policy 10: -
- 1 comment fully supported the strategic policy.

Comments
3 further comments were made to the detail of Strategic Policy 10: -
- 1 comment noted that paragraphs 3.33 and 6.19 refer to the Gypsy Travellers Study but it has not been made available. It is suggested that supporting evidence base is made available.
- 1 comment reflected that consultation should be undertaken with those directly affected as to whether the planned accommodation at the existing site meets the range of needs present in the local community now and in the future.
- 1 comment suggested that criteria based policies will be required in the LDP whether or not there is any current identified need in the area in order to meet future or unexpected demand.

SP11 – Transport Infrastructure Improvements

Comments in Support
2 comments were made in support of Strategic Policy 11: -
- 1 comment expressed strong support to the transport infrastructure improvements.
- 1 comment welcomed the improvement to sustainable transport modes

Comments Objecting
7 comments were made to the detail of Strategic Policy 11: -
- 1 comment suggested that clear links be made to the Regional Transport Plan, where applicable.
- 1 comment questioned why the strategic and core road hierarchy has not been defined at this stage of the plan preparation.
- 1 comment questioned how many of the transport proposals are deliverable in terms of a realistic likelihood that the necessary finance is, or will be, available and committed.
- 1 comment suggested that reference to the online improvements at the A467 South Abertillery needs to be more specific.
- 1 comment expressed concern that no reference to the works on the A467 through Warm Turn and Aberbeeg Road has been made.
- 1 comment suggested that reference be made to the DFM's announcement on road and rail priorities on 2nd December.
- 1 comment welcomed the policy in principle as long as the proposals do not result in any detriment to the natural environment.

SP12 – Transport Requirements for new Development

Comments in Support
3 comments were made in support of Strategic Policy 12: -
- 3 comments welcomed the transport hierarchy for new development.

Comments
3 comments were made in relation to Strategic Policy 12: -
- 1 comment reflected that the current stock of public buses are difficult to access as many buses still have steps to enter the vehicle, and further steps inside.
- 1 comment highlighted that the range of current bus services is poor as it is impossible to travel around the Borough at night.
- 1 comment reflected that an efficient public transport system is required which leaves not one of the communities or people isolated.

SP13 – Leisure & Recreation

Comments in Support
None

Comments
3 comments were made to the detail of Strategic Policy 13: -
- 1 comment objected to policy SP13 as it does not clearly reflect objective 10 or its monitoring indicators. Policies should protect existing areas of accessible natural greenspace and formal public open space, and to encourage the creation of new areas and access improvements.
- 1 comment considered that the policy should also seek to enhance the provision of existing open space where appropriate, ensuring that it is both usable and accessible.
- 1 comment recommended that the work relating to the assessment of leisure and open space is undertaken in line with the provisions of an appropriate Open Space Assessment.

SP14 – Health and Education

Comments in Support
3 comments were made in support of Strategic policy 14: -
- 2 comments fully supported the strategic policy.
- 1 comment noted the reference to the development of Ysbyty Aneurin Bevan and the Local Health Board's Primary Care Estates Strategy was helpful.

Comments
3 comments were made to the detail of Strategic Policy 14: -
- 1 comment reflected that the policy fails to indicate where provision will be made.
- 1 comment reflected that apart from the Primary Care Resource Centre and training centres, all these facilities are to be accommodated on the former steelworks site in Ebbw Vale and should therefore be identified in the local development plan.
- 1 comment reflected that there is no centre in Wales to act as a catalyst for Disabled Living. It is considered that such a centre could be incorporated into the plans for the former Steelworks site.

SP15 – Planning Obligations

Comments in Support
1 comment was made in support of Strategic Policy 15: -

- 1 comment fully supported the strategic policy.

Comments
6 comments were made to detail of Strategic Policy 15: -

- 1 comment raised that consideration of potential developer contributions and the economic viability of development sites needs to be considered in relation to impact on aspects of associated infrastructure, especially on the provision of affordable housing. The deposit LDP should clarify main obligations related to the specific allocations.
- 1 comment considered that the wording of this policy is overly generic and should specify that planning obligations will be sought by the Council on a case-by-case basis.
- 1 comment recommended that the policy commits to preparing further supplementary planning guidance that will set parameters, thresholds and formulas for contributions sought.
- 1 comment considered that the policy should make clear that any proposed planning obligations will take full account of their impact on development viability, before they are imposed on the developer.
- 1 comment highlighted that the policy should make clear that any policies included within the plan that request specific planning obligations are based on evidence that takes full account of their impact on development viability.
- 1 comment stated that requests for contributions should be compliant with the requirement of national policy and supplementary planning guidance.

SP16 – Environmental Protection

Comments in Support
3 comments were made in support of Strategic Policy 16: -

- 1 comment strongly supported the strategic policy.
- 1 comment welcomed the proposal to protect and enhance the natural environment and designated landscape.
- 1 comment welcomed the recognition of biodiversity and how this should be considered in the development of Blaenau Gwent.

Comments
2 comments were made to the detail of Strategic Policy 16: -

- 1 comment recommended the inclusion of the following for clarity and to encourage ongoing management and ownership of nature conservation features; ‘biodiversity and ecological networks’ and ‘minimisation of air, soil, water, noise and light pollution’.
- 1 comment reflected that the strategic policy should also contain and explicit intention to protect, and where appropriate enhance sites designated for their nature conservation interest, and protected species.

SP17 – Built Environment

Comment in Support
None

Comments
2 comments were made to the detail of Strategic Policy 17: -

- 1 comment expressed clarification of what is meant by 'built environment' and whether this encompasses the overall historic environment.
- 1 comment considered that the importance of local landscape character should be considered, possibly as part of policy SP17, as a complement to SP16's concern with the designated landscape.

SP18 - Minerals

Comments in Support
2 comments were made in support of Strategic Policy 18: -

- 1 comment welcomed that Blaenau Gwent will safeguard all coal resources which will include, primary, secondary and tertiary resources.
- 1 comment acknowledged that an Aggregates Safeguarding study is in preparation as per paragraph 3.33.

Comments
10 comments were made to the detail of Strategic Policy 18: -

- 1 comment noted that paragraph 6.31 makes reference to coals resources only being safeguarded where availability or reserves can be demonstrated. It is reflected that there is a need to safeguard all resources where they geologically exist. It will then be a policy decision to decide how to manage the areas.
- 1 comment objected to the omission of the ISAR recommendations relating to the protection of biodiversity and landscape, and the importance of aftercare.
- 1 comment stated that policy SP18 should refer to known 'resources' rather than 'reserves'.
- 1 comment considered that the 'relevant environmental, planning and transportation considerations', which will affect safeguarding, are not clarified within the policy.
- 1 comment reflected that policy SP18 needs to accord with Regional Technical Statement on Aggregates in that resource allocation of £3 million tonnes of hard rock should be provided in the LDP and the use of secondary/ recycled aggregates should be promoted.
- 1 comment considered that there is a lack of evidence base on landbank figures, amount of dormant mineral permissions and proposals for restoration.
- 1 comment referred to paragraph 6.31 and considered that the safeguarding should be in line with the Coals Mineral Technical Advice Note when issued in final form.
- 1 comment reflected that the proposals map should show the areas where coal working will not be permitted over the plan period, with reference being made to this in the minerals policy.
- 1 comment referred to paragraph 6.31 and stated that the presence of coal resources should have helped shape the strategy.
- 1 comment stated that the safeguarding of minerals should be consistent across boundaries with neighbouring authorities.

SP19 – Waste

Comments in Support
1 comment was made in support of Strategic Policy 19: -

- 1 comment noted that the potential waste allocations on employment land are identified in SP19, and that the evidence for waste assessment is scheduled to begin at the end of 2008.

Comments
2 comments were made to the detail of Strategic Policy 19: -

- 1 comment considered that the deposit plan should clarify the regional search criteria and how the Council intends to implement the 'sustainable integrated approach' contained in the policy.
- 1 comment reflected that the supporting text should have confirmed the provisions of sites in policy SP19 will provide capacity for an adequate network of facilities to demonstrate that a genuine choice of suitable sites exists and that B2 locations have enough capacity to accommodate facilities identified as being needed through the Regional Waste Plan.

3.11 MONITORING FRAMEWORK

The eighth question asked respondents if the suggested monitoring framework was acceptable. Of the 20 respondents, 75% agreed, 20% disagreed and 5% didn't know.

Comments in Support

3 comments were made in support of the monitoring framework: -

- 2 comments acknowledged that the monitoring framework will provide a useful basis for the assessment of the effectiveness of the strategic objectives.
- 1 comment welcomed the target of delivering between 2,250 and 3,000 new homes.

Comments

21 comments were made to the detail of the monitoring framework: -

Strategic Objective 8

- 3 comments considered that the emphasis of the second indicator of Strategy Objective 8 should be changed to 'increased amount of existing residential development within 30 minutes travel by public transport to the new hospital and learning campus.
- 2 comments considered that the target in Strategy Objective 8 should be amended to integrated public transport services with appropriate indicators relating to the frequency and coverage of services as well as the number of journeys taken.
- 1 comment suggested more appropriate indicators for Strategic Objective 8 to include; percentage of schools with travel plans, percentage of transport usage by mode, accessibility/ availability of community facilities across the Borough and the length and connectivity of public right of way and cycleway.

Strategic Objective 10

- 1 comment advised an additional indicator for Strategy Objective 10 - 'number of urban parks and green spaces with Green Flag Awards'.

Strategic Objective 12

- 1 comment recommended the inclusion of additional indicators to Strategy Objective 12 including percentage of designated sites in favourable condition; number and area of designated sites within the plan; status of BAP/LBAP habitats and species; proportion of land under agri-environment agreement schemes or which is organic or is in conversion to organic farming; area of greenfield land lost; and number of development located outside settlement boundaries.
- 1 comment suggested the wording amendment of strategic objective 12 to read 'area of land covered by SINC and LNRs'.
- 1 comment reflected that the percentage of nationally important sites which are in favourable condition is not a factor that the LDP has a lot of control over (Strategy Objective 12). The following indicators are suggested; area of section 42 habitats lost to development and number of developments incorporating biodiversity enhancements.

Strategic Objective 13

- 1 comment stated that the indicator for the removal of buildings from the Buildings at Risk Register (Strategic Objective 13) needs to be clarified.

Strategic Objective 14

- 1 comment suggested the inclusion of the following indicators to Strategy Objective 14 – carbon footprint; total vehicle KM; number of applications designed

and laid out to maximise energy efficiency and minimise carbon emissions through reducing the need to travel, and the performance rates of buildings.

- 1 comment suggested the wording amendment of the indicator for strategic objective 14 to read 'area identified and protected as ecological corridor'.

Strategic Objective 18 / 19

- 1 comment stated that the monitoring framework has not provided any targets/indicators relating to SP18 and SP19 which have not been linked to the strategic objectives. A developed framework should include strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation, timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered.

Additional

- 1 comment welcomed the explicit reference to a target for 80% of new dwellings to be built on previously developed land, however it is contended that this target should apply to all new development and not just housing development.
- 1 comment reflected that there is no indicator showing how the LDP has had an impact on historic assets not included in the Buildings Register.
- 1 comment suggested additional indicators for the strategic objectives could be the use of SUDs and Green Roofs.
- 1 comment considered that the identification of ecological corridors is likely to be a time-consuming process and it recommended to monitor length of hedgerow lost and created and number of developments impacting on river corridors.
- 1 comment recognised that a monitoring framework had been developed which included some targets and indicators, however it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered.
- 1 comment referred to the programme for preparation of Supplementary Planning Guidance and stated that it should be specific to the LDP.
- 1 comment stated that until the monitoring arrangements are properly specified it is difficult to assess how responsive the plan might be to changing circumstances. Monitoring evidence should help inform or initiate future amendments or reviews. The Preferred Strategy should be sufficiently flexible to respond to changes in the economy, housing market assessment, strategic take up and other changes.

4.0 CONSIDERATION OF REPRESENTATIONS

4.1 In accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and the guidance contained in section B6 of the Local Development Plan Manual (June 2006) the Council will not respond to individual representations.

4.2 Consideration will however, be given to the issues raised as the Council formulates the draft LDP. The Council will ensure that through the process of formulating the LDP respondents and stakeholders are fully informed of how the comments received through the Preferred Strategy consultation have affected the polices and proposals contained in the emerging plan.

5.0 FURTHER ADVICE

5.1 If your require any further advice or assistance in respect of this report or other LDP documents or wish to be placed on the Council's consultation database please contact a member of the Planning Policy Team at:

Business Resource Centre
Tafarnaubach Industrial Estate
Tredegar
NP22 3AA

E-mail: planningpolicy@blaenau-gwent.gov.uk

Telephone: 01495 374740/ 355538 / 355544

Appendix 1 – List of Specific Consultation Bodies

Category Description	Title	First Name	Surname	Organisation
Welsh Assembly Government	Ms	Elaine	Ancrum	National Assembly for Wales
				Cadw
Assembly Sponsored Public Bodies				Countryside Council for Wales
	Ms	Jackie	Walters	Environment Agency
Adjoining Local Authorities	Ms	Tracy	Nettleton	Brecon Beacons National Park
	Mrs	Rhian	Kyte	Caerphilly County Borough Council
	Mr	N	Davies	Merthyr Tydfil County Borough Council
				Powys County Borough Council
	Mr	R	Murray	Torfaen County Borough Council
Local and Adjoining Community Councils	Mr	G	Bartlett	Abertillery & Llanhilleth Community Council
	Mr	Steve	Bartlett	Nantyglo & Blaina Town Council
	Mrs	A	Davies	Brynmawr Town Council
	Mr	J	Morgan	Tredegar Town Council
	Mr	J P	Williams	Rhymney Community Council
	Mrs	D	Gronow	New Tredegar Community Council
	Mr	Rhian	Deakin	Blaenavon Town Council
Licensed Telcommunications Operators				British Telecom
				NTL
				Mobile Operators Association
				Virgin Mobile
Local Health Board	Dr	Jane	Layzell	Blaenau Gwent Local Health Board
Utilities	Mr	Neil	Dalley	British Gas (TRANSCO) Wales Ltd
				British Wind Energy Association
	Mr	K	Ferguson	Coal Authority
				Celtic Energy Ltd
				Confederation of UK Coal Producers
	Dr	Emma	Wilson	Innogy plc
				National Grid
				Powergen
				RWE N power
				SWALEC
				Western Power Distribution
				Dwr Cymru Welsh Water
	Mr	Ryan	Bowen	Hyder Consulting Ltd
				Lattice Property
		Steve	Gray	Wales and West Utilities
UK Government				Department for Transport
				Department of Trade & Industry
				The Home Office
	Mr	Allan	Fogg	Defence Estates
		Ruth	Shelton	Planning Inspectorate
				Ministry of Defence
Vouluntary Bodies	Mr	Huw	Lewis	GAVO
				WCVA
	Mr	C	Meddins	People First Blaenau Gwent
Ethnic Minority Groups				Equality & Human Rights Commission
	Mr	A	Jones	Valleys Race Equality Council
Religious Organisations	Mr	C	Webb	Church in Wales
				Catholic Bishops Conference of England & Wales
				Evangelical Movement in Wales Methodist Church
				Muslim Council for Wales
				South Wales Baptist Association
				United Reform Church
				Salvation Army
				Cardiff Buddhist Centre

Category Description	Title	First Name	Surname	Organisation
Disability Groups				Disability Wales
	Mrs	D	Robbins	Visually Impaired Persons Club
				RNIB Cymru
				Partially Sighted Society
	Mrs	A	O'Callaghan	PHAB
				Disabled Persons Transport Advisory Committee
				Federation for the Blind
	Mr	C	Jones	Gwent Association for the Blind
	Mr	E	Slupski	Blaenau Gwent Access Group for Disabled
				Deaf Association Wales
	Mr	W	Bee	Disability Rights Commission
	Mr	R	Tuck	Brynmawr & District Mencap Society
	Mr	Neil	Betteridge	Disabled Persons Transport Advisory Committee
	Mrs	J	Pritchard	North Monmouthshire Mencap
	Mr	F	Green	Gwent Valleys S. C. For The Disabled
Business Interests	Mr	D	Hillman	Blaina & Nantyglo Chamber of Trade
	Mr	A	Edwards	Town Centre Partnership Brynmawr Traders
	Mr	M	Phillips	Ebbw Vale Trades Council
	Mr	G	Powell	Tredegar Development Trust
	Mr	M	Fraiser	Working Links
LDP Forum	Councillor	Des	Hillman	Leader
	Councillor	Don	Wilcox	Executive Member for Regeneration
	Councillor	John	Morgan	
	Mrs	Clair	Stonelake	Regeneration Executive - WAG
	Mr	Ernie	Pitt	Base Handling Products Ltd
	Ms	Kerry	Diamond	Continental Teves
	Ms	Maria	Golightly	Princes Trust Cymru
	Mr	Richard	Bevan	Blaenau Gwent Local Health Board
	Dr	Jane	Layzell	Blaenau Gwent Local Health Board
	Ms	Patt	Tagg	Employment Service
	Mr	John	Davies	Ebbw Vale and District Development Trust
	Ms	Eluned	Jones	WEFO
	Ms	Jane	McMillian	WEFO
	Mr	Jeremy	Gass	University of the Valleys
	Mr	Brian	Kember	Tredegar Development Trust
	Mr	Colin	Davies	Working Links
	Mr	Wayne	Thomas	RISE (The Learning Network)
	Mr	Steve	Harford	Careers Wales Service
	Mr	Nigel	Forster	Capita Symonds
	Mr	Andy	Thomas	Coleg Gwent
	Ms	Christina	Barnes	Linc-Cymru
	Ms	Marlynne	Headworth	Environment Agency Wales
	Mrs	Amanda	Moore	HOV-Community Sector
	Mr	Huw	Lewis	GAVO
	Mr	Frank	Callus	HOV Strategic Programme Co-ordinator (Education)
	Mr	Chris	Ashman	Heads of the Valleys Programme Director
	Mr	Chris	Jarvis	Venture Wales
	Mrs	Sue	John	Flexible Support for Business
	Mr	Robin	Morrison	Chief Executive - BGCBC
	Mr	John	Parsons	Corporate Director Environment - BGCBC
	Mr	Gareth	Jones	Chief Regeneration Officer - BGCBC
	Mr	Mark	Price	Head of Community Regeneration - BGCBC
	Mr	Ged	McHugh	Head of Economic Development - BGCBC
	Mr	Richard	Price	The Home Builders Federation
	Mr	Gwyn	Smith	Sustrans Cymru
	Mr	Glyn	Davies	Ramblers Association - North Gwent
	Mr	Jeff	Pride	Herian
	Mr	Neil	Maylan	Glamorgan Gwent Archaeological Trust Ltd
	Mr	Mike	Johnson	The Campaign for the Protection of Rural Wales

Appendix 2 (a) – Letter to Specific Consultation Bodies

354740
355580 lynda.healy@blaenau-gwent.gov.uk

LFH/19.4

Mrs L F Healy

7th November 2008

Dear Sir / Madam,

RE: BLAENAU GWENT COUNTY BOROUGH LOCAL DEVELOPMENT PLAN 2006-2021: PREFERRED STRATEGY CONSULTATION

I am writing to inform you of the commencement of a six-week public consultation period on the Preferred Strategy for the Local Development Plan. The consultation period runs from Friday 7th November to Friday 19th December 2008.

The Council would welcome your views. Please find enclosed a CD disk, which contains the Preferred Strategy and the Initial Sustainability Appraisal Report that are subject to consultation. Should you wish to make any comments on the documents, I would be grateful if you could complete the relevant representation form and return it to the **Development Plans Manager, Business Resource Centre, Tafarnaubach Industrial Estate, Tredegar, NP22 3AA** no later than noon on the **Friday 19th December 2008.** Enclosed with this letter are two representation forms (one to comment on the Preferred Strategy and the other to comment on the Initial Sustainability Appraisal Report). An electronic version of the representation forms can be downloaded from the council's website www.blaenau-gwent.gov.uk.

Please note, at the same time as the consultation on the Preferred Strategy is being carried out, the Candidate Sites Register, the Habitat Regulation Assessment Screening Report, the Employment Background Paper and the Population and Housing Background Paper are also being made available for information (these are also contained on the CD disk).

If you have any questions regarding the aforementioned, or indeed any aspect of the Local Development Plan, please do not hesitate to contact the Planning Policy Team on (01495) 354740 / 355538 / 355544, alternatively e-mail planningpolicy@blaenau-gwent.gov.uk.

Yours faithfully,

L J Healy

Lynda Healy
Development Plans Manager

Appendix 2 (b) - Letter to General, Other and Government Consultation Bodies

354740
355580 lynda.healy@blaenau-gwent.gov.uk

LFH/19.4

Mrs L F Healy

7th November 2008

Dear Sir / Madam,

RE: BLAENAU GWENT COUNTY BOROUGH LOCAL DEVELOPMENT PLAN 2006-2021: PREFERRED STRATEGY CONSULTATION

I am writing to inform you of the commencement of a six-week public consultation period on the Preferred Strategy for the Local Development Plan. The consultation period runs from Friday 7th November to Friday 19th December 2008.

The Council would welcome your views. Enclosed with this letter are a summary leaflet and a comment form. The leaflet provides a summary of the Preferred Strategy document and details of where you can come and see us.

Furthermore, more detailed information on the Preferred Strategy and the Initial Sustainability Appraisal Report and associated documents are available to view on the Council's website www.blaenau-gwent.gov.uk, at all libraries, outreach venues, the Civic Centre, Blaina District Office and the Business Resource Centre. Hard copies of the documents are available on request.

Should you wish to make any comments on the Preferred Strategy, I would be grateful if you could complete a representation form and return it to the **Development Plans Manager, Business Resource Centre, Tafarnaubach Industrial Estate, Tredegar, NP22 3AA** by no later than noon on **Friday 19th December 2008**.

If you have any questions regarding this letter, or indeed any aspect of the Local Development Plan, please do not hesitate to contact the Planning Policy Team on (01495) 354740 / 355538 / 355544.

Yours faithfully,

L F Healy

Lynda Healy
Development Plans Manager

Appendix 2 (c) - Letter to Councillors

354740

355580 lynda.healy@blaenau-gwent.gov.uk

LFH/19.4

Mrs L F Healy

7th November 2008

Dear Councillor,

RE: BLAENAU GWENT COUNTY BOROUGH LOCAL DEVELOPMENT PLAN 2006-2021: PREFERRED STRATEGY CONSULTATION

I am writing to inform you of the commencement of a six-week public consultation on the Preferred Strategy for the Local Development Plan. The consultation period runs from Friday 7th November to Friday 19th December 2008.

Please find enclosed a copy of the Preferred Strategy and the Initial Sustainability Appraisal Report that are subject to consultation. Also enclosed with this letter is a summary leaflet, which provides a summary of the Preferred Strategy document and details of where you can come and see us.

Should you wish to make any comments on the documents, I would be grateful if you could complete the relevant representation form and return it to the **Development Plans Manager, Business Resource Centre, Tafarnaubach Industrial Estate, Tredegar, NP22 3AA** no later than noon on the **Friday 19th December 2008.** Enclosed with this letter are two representation forms (one to comment on the Preferred Strategy and the other to comment on the Initial Sustainability Appraisal Report). An electronic version of the representation forms can be downloaded from the council's website www.blaenau-gwent.gov.uk.

Please note, at the same time as the consultation of the Preferred Strategy is being carried out, the Candidate Sites Register, the Habitat Regulation Assessment Screening Report, the Employment Background Paper and the Population and Housing Background Paper are also being made available for information. Hard copies of these documents are available on request. Alternatively, they are available to view on the Council's website www.blaenau-gwent.gov.uk, at all libraries, outreach venues, the Civic Centre, Blaina District Office, the Business Resource Centre and the Members room.

If you have any questions regarding this letter, or indeed any aspect of the Local Development Plan, please do not hesitate to contact the Planning Policy Team on (01495) 354740 / 355538 / 355544.

Yours faithfully,

L F Healy

Lynda Healy
Development Plans Manager

Appendix 3 – List of General, Other and Government Consultation Bodies

Category Description	First Name	Surname	Organisation
As specified in LDP Wales	Peter	Huxtable	British Aggregates Association
			British Geological Survey
			British Waterways
			Centre for Ecology
			Cardiff Chamber of Commerce
			CBI
			Institute of Directors Wales
			Country Landowners and Business Association
	Chris	Bourchier	Crown Estate
			Design Commission for Wales
			Forestry Commission Wales
			Gypsy Council
			Health & Safety Executive
			Farmers Union Wales
			Federation of Small Businesses
			National Farmers Union of Wales
	Edward	Miembro	Planning Aid Wales
	Andy	Harris	Police Architectural Liaison Officer
			Post Office Property Holdings
			Royal Institute of Chartered Surveyors
			Royal Town Planning Institute (Wales)
	Keith	Edwards	Chartered Institute of Housing Cymru
			The Institution of Civil Engineers
			Sports Council for Wales
			Land & Property, Gwent Police
			Gwent Authorities Emergency Planning Service
	Andrew	Marles	Deputy Chief Fire Officer
			Welsh Ambulance Services NHS Trust
			Forestry Authority (Wales)
			Wales Voluntary Action
Local Community, Conservation, Amenity groups, Agenda 21 Groups/ Civic Societies	Geraint	Hopkins	Wales Environment Link
			Welsh Environmental Services Association
	Mike	Pitt	Friends of the Earth (Cymru)
			British Trust for Ornithology
	Haf	Roberts	WWF
	W	Morris	Blaina Heritage Action Group
	J	Goode	Friends of Bedwelty Park
	K	Lines	Friends of Festival Park
	Ian	Rabjohns	Gwent Bat Group
	Mike	Webb	RSPB
			Welsh Historic Gardens Trust
	Sandy	Grant	Trefil Community Action Group
	Lydia	King	Westside and Forgeside Tenants and Residents Association
	W.	Goode	Borough Allotments Association
	Tanya	Davies	Npower renewables
	Mark	Tebboth	Energy Saving Trust
	James T	Poyner	Miller Argent (South Wales) Limited
			Wildlife Trust for South & West Wales
	Steve	Molby	West Coast Energy Ltd
			Camping & Caravaning Club
			British Naturalists Association
			Countryside Alliance
			Cyclists Touring Club
			Cardiff Cycling Campaign

Category Description	First Name	Surname	Organisation
Local Transport Operators			Arriva Trains Wales
			Bus Users UK
	David	Butcher	Civil Aviation Authority
			Confederation of Passenger Transport
			First Great Western
			Freight Transport Association
	Steve	Austin	Network Rail Infrastructure Lmited
			Rail Passenger Committee Wales
	Micheal	Farmer	Road Haulage Association Ltd
			Stagecoach in South Wales
			Sustrans Cymru
	Neil	Stevens	Rail Freight Group
			Rail Freight Group
			Cardiff International Airport
	Mike	Grant	Chief Executive, Strategic Rail Authority
			English, Welsh and Scottish Railways
Communities First	Nigel	Collins	Community First, Abertillery
	Ceri	Jones	Community First, Blaina
	David	Llewellyn	Community First, Cwmtillery
	Sharon	Howell	Community First, Nantyglo
	Anna	Chard	Community First, Llanhilleth
	Mair	Sheen	Community First, Six Bells
	Jayne	Nicholas	Tredegar Communities First Partnership
Health	Gareth	Roberts	Welsh Health Estates
			North Gwent Community Health Council
	V	Owen	North Gwent Mental Health League of Friends
	A	Lewis	Abertillery Mental Health Self Support Group
	A	Lewis	Brynithel Mental Health Self Support Group
	M	Evans/G Hicks	Community Mental Health Team (CMHT)
			Equal Opportunities Commission
	Donna	Patterson	Local Health Board
	Phil	Harris	Tredegar Mental Health Support Group
Community Planning Groups			Safer Blaenau Gwent
	Heather	Ross	CCET - Blaenau Gwent
			Blaenau Gwent Local Health Alliance
	Claire	Pooley	Blaenau Gwent Biodiversity Partnership
Education			University of Wales Newport
	Rob	Rowlands	Cardiff University
			Coleg Gwent
			Welsh Assembly Government
	Anna	Foote	Headteacher, Tredegar Comprehensive School
	Michael	Fahey	Headteacher, Ebbw Vale Senior Comprehensive School
	Mike	Norton	Headteacher, Brynmawr Comprehensive School
	Wes	Hinwood	Headteacher, Nantyglo Comprehensive School
	Pauline	Thomas	Headteacher, Abertillery Comprehensive School
	Colin	James	Headteacher, Glyncoed Comprehensive School
Housing Associations	Martin	Hughes	Aelwyd Housing Association Limited
			First Choice Housing Association Ltd
			Gwerin (Cymru) Housing Association Ltd
			Linc Cymru
			United Welsh

Category Description	First Name	Surname	Organisation
Elderly Persons Organisations	Ralph	Thomas	National Old Age Pensioners Association for Wales
	G.	Tarr	Hilltop Pensioners Association
	J	Jones	Rassau Senior Citizens
	R	Paul	Raglan Terrace Pensioners Association
	G.	Tarr	Hilltop Pensioners Association
	C	Jones	Brynithel Senior Citizens
	D	Adams	Brynmawr Senior Citizens Associations
	J	Hicks	Cwmtillery OAP
	B	Jones	Garnlydan Aged-Persons Welfare Associations
	J	Emmitt	Nantybwch Senior Citizens Assoc.
	Bert	Westacort	Nantybwch Senior Citizens Association
	J	Jones	Rassau OAP Association
	E	Thomas	Tyllwyn OAP Association
	S	Goddard	Waunlwyd OAP
Ex Offenders Groups			Nacro Cymru Education & Employment Services in South Wales
			Apex Charitable trust
Gypsy and Travellers Groups			Gypsy Traveller Law Reform Coalition
Government Agencies	David	Newland	Arts Council of Wales
	Peter	Cole	Capital Region Tourism
	Vaughan	Lewis	Coed Cymru
			Glamorgan Gwent Archaeological Trust Ltd
			Hazardous Installations Directorate
			Civic Trust for Wales
			The National Trust Wales
Homeless Organisations			Shelter Cymru
			Crisis
House Builders	Gareth	Hawke	Barratt South Wales
	Mark	Harris	Bellway Homes
	Michael	Benfield	Benfield ATT
			Bovis Homes
			Bond Pearce
			C P Construction
	Andrew	Crompton	Charles Church Wales
			Compton Developments
			Crest Nicholson PLC
			David McLean Homes Ltd
			Davies Homes
			Taylor Wimpey South Wales
			Lovell
			Persimmon Homes Wales Ltd
	Jane	Carpenter	Redrow Homes South Wales Ltd
			Robert Hitchins
Planning Consultants	David	Evans	Robert Hitchins
			Atkins
	Robin	Williams	Boyer Planning
			CDN Planning Ltd.
			ECOTEC Research and Consulting
			Halcrow Group Ltd
			Hepher Dixon
			Jacobs
	Martin	Pollard	James Barr Associates
			Kevin Nield and Partners
			Malcolm Judd & Partners
	Malcolm	Hockaday	Nathaniel Lichfiled and Partners
			Peacock & Smith
			RPS Group
			Tony Thorpe Associates
			White Young Green
			Land Access & Recreation Association
			R E Phillips & Partners
	Kelly	Sykes	Atisreal
	Emma	Brooks	RPS Planning & Development
	Nicola	Berry	Pegasus Planning Group
	Matthew	Hard	DLP Planning

Category Description	First Name	Surname	Organisation
Local Agents	John	Payne	
	Michael J	Harris	
	Adrian	Reed	
			Peter Barnes & Associates
			Mike Phillips
			Chris Meredith
			Graham Worthington
			Adrian Drew
Political	Trish	Law AM	Trish Law AM
	Dai	Davies	Member of Parliament
	Mohammad	Asghar AM	South Wales Central, National Assembly for Wales
	Jocelyn	Davies AM	South Wales Central, National Assembly for Wales
	Micheal	German AM	South Wales Central, National Assembly for Wales
	William	Graham AM	South Wales Central, National Assembly for Wales
			Labour Party
			Plaid Cymru
			The Welsh Conservatives
			Welsh Democrats
Voluntary Public Bodies	Robert	Durward	British Aggregates Association
			Community Service Volunteers Wales
	A.	Nicholas	Ramblers Association - North Gwent
			British Horse Society
			Ramblers Association Wales
			Prince's Trust Cymru
			Welsh Consumer Council
	Paula	Evans	One Voice Wales
	Steve	Durbin	Welsh Association of Motor Clubs
Childrren and Young People	J	Snook	The Princes Trust Volunteers Ebbw Vale
			Children in Wales
			Clybiau Plant Cymru Kids Clubs
	G	Jones	Brynithel Youth and Community Association
	Amy	Gregory	Cefn Golau Youth Development Crew
	R	Watson	Cwmcelyn Chapel Youth Club
	C	Prosser	Glyncoed Youth Community Representatives
	S	Crandon	Llanhilleth Youth Club
	C	Powis	St Anne's Church Youth Club
	M	Lloyd	Tredegar Youth Café
	G	Amey	Youth Choices
	L.	Williams	NCH Action for Children
			NCH Action For Children (Network)
			Youth Hostel Association
	S.	Howell	Young Dimensions
Commoners Association	M	Lloyd	Mynydd Carn-y-Cefn Commoners Association
	D	Jones	Nantyglo & Blaina Commoners Association
	A	Davies	Manmoel Commoners Association
	Janet	Haliday	Bedwellty Commoners Association
	M	Bowen	Commoners Association
	T	Tapscott	Commoners Association
	J	Burchell	Commoners Association
	G	Davies	Commoners Association
	Alan	Williams	Blorange Commoners Association
	J	Hudd	Commoners Association
		Evans	Commoners Association
	M	Lippiatt	Commoners Association
	Mike	Roberts	Rhymney & Bedwellty Commoners Association
	Lorraine	Shehan	Commoners Association
Individual	Stewart	Ross	Stewart Ross Associates
	Julie	Newcombe	
	G	Azouz	Questedge Ltd
	Stacey	Chaplin	
	B J	Edmunds	
	W J	Cooksey	
		Clist	
	Beverly	Cousins	
	Andrew	Jones	

Category Description	First Name	Surname	Organisation
Individual	G P	Jones	
	J	Evans	
		Churchward	
	Idris	Watkins	
	Nick	Thomas	
	D	Jones	
	D	Jones	
	M	Morris	
	M	Pagett	
	Jack	Hanbury	
	Roger	Leadbeter	
	Philip	Crozier	
	Helen	Williams	
	Sean	Tohill	
	James	Edwards	
	Reg	Arnold	
	Elaine	Townsend	
	Colin	Stevens	
	Margaret	Retallick	
	Jessica	Daley	
	Heidi	Carter	
Candidate Site Representors	Darren	Parker	DTZ
	Terry	Maggs	
	Fred	Howells	
	Carolyn	Jones	RPS Planning & Development
	John	Down	Pontypool & Blaenavon Railway Co.
	W John	Evans	
	Michelle	Jones	
	I	Watkins	Hedland Civil Engineering
	Graham	Morris	
	Adam	Everley	
	A	Jenkins	
	DV & H	Warren	
	M P & R	Haven	
	Sean	Pagett	
	Sarah	Fotheringham	Linc Cymru Housing
	Julian	Padfield	
	M	Jenkins	
	Elizabeth	Pinocci	
	Martyn	Richards	
	Carl	Summers	
	A	Morgan	
Blaenau Gwent Councillor	N.J	Daniels	
	J.	Taylor	
	S.	Bard	
	D.	Hancock	
	W.C.	Watkins	
	D.	Davies	
	M.	Edwards	
	R.	Rocke	
	D.	Hughes	
	H.	McCarthy	
	M.	Bartlett	
	J.T	Rogers	
	D.	Wilcox	
	J.	Morgan	
	B.K.	Clements	
	M. J.	Lewis	
	P.J	Abbott	
	K. E.	Barnes	
	B. J.	Scully	
	C.	Meredith	
	D. H.	Wilkshire	

Category Description	First Name	Surname	Organisation
Blaenau Gwent Councillor	W. J.	Williams M.B.E.J.P.	
	G. J.	Hughes	
	G.R	Thomas	
	G.P	Collier	
	D.	Hillman	
	Y.	Lewis	
	M.B.	Dally	
	S.	Ford	
	J.E.	Mason	
	J. J.	Hopkins	
	K.J.	Brown	
	D. L.	Elias	
	H.L.	Trollope	
	N.	Hobbs	
	D. I.	Morris	
	S.C.	Thomas	
	J.	Owen	
	K.	Hayden	
	D.	Rowberry	
	D. J.	Owens	
	B.	Thomas	

Appendix 4 – List of Consultees who responded to the Consultation

First Name	Surname	Organisation
Paul	Davies	First Choice Housing Association
Lynn	Phillips	Blaenau Gwent County Borough Council
Michelle	Parfitt	Blaenau Gwent County Borough Council
Matthew	Jorden	Libraries
K M	Musa	Sonael Care Homes Ltd
Clive	Narrainen	
W H	Davies	
Colin	Francombe	
S.J.	Staines	Friends, Families and Travellers, (FFT) Planning
Jimi	Adeleye	Secretary, Disabled Persons Transport Advisory Committee, (DPTAC)
Peter	Adamson	
Bradley	Morgan	
Andrew	Male	
Joan	Evans	
Mark	Edwards	Blaenau Gwent County Borough Council
C	Rowland	
John	Down	Pontypool and Blaenavon Railway Co
Allan	Thomas	
Joan	Absalom	Blaenau Gwent Local Health Board
P	Davies	
Rachel	Bust	The Coal Authority
Neil	Maylan	Glamorgan-Gwent Archaeological Trust
Anne	Palmer-Phillips	
Wendy	Richards	Design Commission for Wales
David	Llewellyn	Communities First - Co-op
Richard	Foot	DPP LLP
Chris	Cox	DTZ
Dave	Lawrence	Roger Tym and Partners
Rhian	Lees	DPP
Laurence	Forse	Harmers Ltd
Andrew	Muir	Harmers Ltd
Laurence	Forse	Harmers Ltd
David	Cliff	Savills
Richard	Price	The Home Builders Federation
Graham	Bartlett	Community Council, Abertillery/Llanhilleth
Maggie	Hill	Regional Manager, Countryside Council for Wales
Laurence	Forse	Harmers Ltd
Mark	Tebboth	Energy Saving Trust Wales
Ben	Lewis	GVA Grimley Ltd
Owain	Griffiths	GVA Grimley Ltd
Angela	Davies	Brynmawr Town Council
Kayna	Tregay	Environment Agency Wales
Mark	Newey	Planning Division, Welsh Assembly Government
James	Roles	
Gayron	Williams	
Sorrel	Jones	Gwent Wildlife Trust

First Name	Surname	Organisation
Trish	Law	AM
Dai	Davies	MP
Gemma	Grimes	BWEA

Appendix 5 – Public Notice

Cyngor Bwrdeistref Sirol

Blaenau Gwent

County Borough Council

HYSBYSIAD CYHOEDDUS

PUBLIC NOTICE

Deddf Cynllunio a Phrynu Gorfodol 2004
Rheoliadau Asesiad Amgylcheddol Cynlluniau a Rhaglenni (Cymru)
Rheoliadau Cynllunio Tref a Gwlad (Cynllun Datblygu Lleol) (Cymru) 2005 (Rheoliad 15)

Hysbysiad Ymgynghoriad Cyhoeddus Cyn-adneuo ar gyfer Cynllun Datblygu Lleol

Cynllun Datblygu Lleol Bwrdeistref Sirol Blaenau Gwent Strategaeth a Ffafrir (2006 - 2021)

Mae Cyngor Bwrdeistref Sirol Blaenau Gwent wedi paratoi dogfennau cynigion cyn-adneuo ar gyfer y cynllun uchod. Pan gaiff ei fabwysiadu, bydd y cynllun datblygu lleol yn disodli'r Cynllun Datblygu Unedol presennol a bydd yn sail ar gyfer penderfyniadau ar gynlluniio dalhydd tir yn Mwrdeistref Sirol Blaenau Gwent, ac eithrio'r ardal o fewn Parc Cenedlaethol Bannau Brycheiniog.

Mae'r dogfennau cynigion cyn adneuo yn amlinellu gweledigaeth, opsiynau strategol, strategaeth a ffafrir a pholisiau allweddol yr Awdurdod, ac yn cynnwys gwybodaeth gefndir allweddol ac adroddiad gwerthuso cynaliadwyedd dechreuol (sy'n cynnwys yr adroddiad amgylcheddol).

Mae copiau o'r dogfennau ar gael i'w harchwilio gan y cyhoedd yn ddirdâl yn ystod oriau swyddfa rhwng 12.00 canol dydd ar 7 Tachwedd a 12.00 canol dydd ar 19 Rhagfyr 2008 yn:

Swyddfeydd Bwrdeistref y Cyngor, Y Ganolfan Ddinesig, Glyn Ebwy
Canolfan Adnoddau Busnes, Stad Ddiwydiannol Tafarnaubach, Tredegar
Rheoli Cynllunio, Swyddfeydd y Cyngor, Stryd Fawr, Blaenau

Mae'r dogfennau hefyd ar gael ar gyfer yr un cyfnod yn y llyfrgelloedd cyhoeddus yn ystod oriau agor.

Maent hefyd ar gael ar wefan y Cyngor yn www.blaenau-gwent.gov.uk

Dylid anfon sylwadau (yn cynnwys gwrthwynebiadau) yng nghylch y cynigion mewn ysgrifen at y ffurflenni dynodedig at **Y Rheolwr Cynlluniau Datblygu, Canolfan Adnoddau Busnes, Stad Ddiwydiannol Tafarnaubach, Tredegar, NP22 3AA**, neu drwy e-bost at planningpolicy@blaenau-gwent.gov.uk a rhaid eu derbyn erbyn 12 canol dydd ddydd Gwener 19 Rhagfyr. **Ni chaiff sylwadau a dderbynnir ar ôl yr amser hwn eu hystyried.** Dylai sylwadau (yn cynnwys gwrthwynebiadau) nodi pa faterion y cyfeirant atynt. Mae'r ffurflen ar gyfer gwneud sylwadau ar gael yn y llecynnau adneuo a restrwyd uchod, drwy ffonio 01495 354797 neu ar-lein yn www.blaenau-gwent.gov.uk

Mewn amlon cais gyda'r sylwadau am amlon hysbysiad i gyfeirio penodol ar gam nesaf y Cynllun Datblygu Lleol a'u nod fod y Cynllun Datblygu Lleol wedi'i gyflwyno i Lywodraeth Cynulliad Cymru ar gyfer archwiliad annibynnol a/neu fod y cynllun wedi'i fabwysiadu.

Dim ond yn unol gyda'r hysbysiad hwn y mae'n olynnol i'r Awdurdod ystyried sylwadau. Ni chaiff sylwadau a wnaed ar y cam cyn-adneuo presennol eu hystyried gan yr Arolygydd a benodwyd i gynnal yr Archwiliad Annibynnol. Bydd cyfle pellach i wneud sylwadau ar y cam adneuo a chaiff y sylwadau hyn eu hystyried yn yr archwiliad.

Mae gwybodaeth bellach ar gael gan y Tîm Polisi Cynllunio ar 01495 354740/355538/355544 neu ar wefan y Cyngor yn www.blaenau-gwent.gov.uk

Planning and Compulsory Purchase Act 2004
The Environment Assessment of Plans and Programmes (Wales) Regulations 2004
The Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (Regulation 15)

Notice of Pre-deposit Public Consultation for a Local Development Plan

Blaenau Gwent County Borough Local Development Plan
Preferred Strategy (2006 - 2021)

Blaenau Gwent County Borough Council has prepared pre-deposit proposals documents for the above plan. The Local Development Plan (LDP) will, upon adoption, replace the current Unitary Development Plan and be the basis for decisions on land use planning in Blaenau Gwent County Borough, excluding the area within the Brecon Beacons National Park.

The pre-deposit proposals documents outline the Authority's vision, strategic options, preferred strategy and key policies, and include key background information and an initial sustainability appraisal report (which includes the environmental report).

Copies of the documents are available for public inspection free of charge during office hours from **12.00 noon on 7th November to 12.00 noon on 19th December 2008** at:
Council Municipal Offices, Civic Centre, Ebbw Vale,
Business Resource Centre, Tafarnaubach Industrial Estate, Tredegar
Planning Control, Council Offices, High Street, Blaina

The documents are also available for the same period at public libraries during opening hours:

They are also available on the Council's website at www.blaenau-gwent.gov.uk

Representations (including objections) in respect of the proposals, should be sent on the prescribed forms in writing to the **Development Plans Manager, Business Resource Centre, Tafarnaubach Industrial Estate, Tredegar, NP22 3AA**, or by email to planningpolicy@blaenau-gwent.gov.uk and must be received by 12 noon on Friday 19th December 2008. **Representations received after this time will not be considered.** Representations (including objections) should specify the matters to which they relate. The form for making representations is available at the deposit locations listed above, by telephoning 01495 354797 or on-line at www.blaenau-gwent.gov.uk

Representations may be accompanied by a request to be notified at a specified address of the next stage of the LDP and/or that the LDP has been submitted to the Welsh Assembly Government for independent examination and/or of the adoption of the plan.

The Authority is only required to consider representations made in accordance with this notice. Representations made at the current pre-deposit stage will not be considered by the Inspector appointed to carry out the Independent Examination. There will be a further opportunity for representations to be made at the deposit stage and these representations will be considered at the examination.

Further information is available from the Planning Policy Team on 01495 354740/355538/355544 or on the Council's website at www.blaenau-gwent.gov.uk

Appendix 6 – List of Exhibitions

Brynmawr Library Market Square, Brynmawr	**Tuesday 11th November** 9.00am - 1.00pm
Venue 1 (Kidz R Us) Park Place, Georgetown	**Wednesday 12th November** 9.00am - 12.30pm
Swffryd Community Centre Walters Avenue, Swffryd	**Thursday 13th November** **9.00am - 2.30pm**
Tesco Abertillery Castle Street, Abertillery	**Friday 14th November** 9.00am - 1.00pm
Tesco Ebbw Vale North West Approach, Ebbw Vale	**Saturday 15th November** 9.00am - 2.00pm
Cwm Info Shop 38 Marine Street, Cwm	**Monday 17th November** 12.00pm - 3.00pm
Abertillery Leisure Centre Alma Street, Abertillery	**Wednesday 19th November** 4.00pm - 8.30pm
Llanhilleth Institute Llanhilleth	**Thursday 20th November** 10.00am - 2.00pm
Parc Bryn Bach Merthyr Road, Tredegar	**Friday 21st November** 11.30am - 3.30pm
Blaina Integrated Children's Centre High Street, Blaina	**Monday 24th November** 9.00am - 1.00pm
Rassau Community Centre 5 Summerfield Road, Rassau	**Tuesday 25th November** 10.00am - 3.00pm
Six Bells Community Centre Six Bells	**Wednesday 26th November** 9.00am - 1.00pm
Ebbw Vale Library Bethcar Street, Ebbw Vale	**Thursday 27th November** 1.30pm - 5.30pm
Lakeside Retail Park Brynmawr	**Saturday 29th November** 9.30am - 1.00pm
Tredegar Library The Circle, Tredegar	**Tuesday 2nd December** 9.00am - 1.00pm
Beaufort Hill Welfare Hall Beaufort Hill, Beaufort	**Wednesday 3rd December** 12.00pm - 4.00pm
Badminton OAP Hall Beaufort Terrace, Badminton	**Thursday 4th December** 3.00pm - 8.00pm
Garnlydan Info Shop Queensway, Garnlydan	**Thursday 11th December** 5.30pm - 7.30pm

Appendix 7 (a) – Preferred Strategy Poster

Blaenau Gwent

Help shape the future of Blaenau Gwent

Do you want to have your say on :

How many houses are going to be built?

How many jobs are to be provided?

Where new development is to be located?

Then come along to see us at one of our drop-in sessions in your ward

Tuesday 11th November Brynmawr Library
9.00am – 1.00pm - Market Square, Brynmawr

Wednesday 12th November Venue 1 (Kidz R Us)
9.00am – 12.30pm - Park Place, Georgetown

Thursday 13th November Swffryd Community Centre
9.00am – 2.30pm - Walters Avenue, Swffryd

Friday 14th November Tesco - Abertillery
9.00am – 1.00pm - Castle Street, Abertillery

Saturday 15th November Tesco - Ebbw Vale
9.00am – 2.00pm - North West Approach, Ebbw Vale

Monday 17th November Cwm Info shop
12.00pm – 3.00pm - 38 Marine Street, Cwm

Wednesday 19th November Abertillery Leisure Centre
4.00pm – 8.30pm - Alma Street, Abertillery

Thursday 20th November Llanhilleth Institute
10.00am – 2.00pm - Llanhilleth Institute

Friday 21st November Parc Bryn Bach
11.30am – 3.30pm - Merthyr Road, Tredegar

Monday 24th November Blaina Integrated Children's Centre
9.00am-1.00pm - High Street, Blaina

Tuesday 25th November Rassau Community Centre
10.00am - 3.00pm - 5 Summerfield Road, Rassau

Wednesday 26th November Six Bells Community Centre
9.00am – 1.00pm - Six Bells

Thursday 27th November Ebbw Vale Library
1.30pm – 5.30pm - Bethcar Street, Ebbw Vale

Saturday 29th November Lakeside Retail Park
9.30am - 1.00pm - Brynmawr

Tuesday 2nd December Tredegar Library
9.00am – 1.00pm - The Circle, Tredegar

Wednesday 3rd December Beaufort Hill Welfare Hall
12.00pm – 4.00pm - Beaufort Hill, Beaufort

Thursday 4th December Badminton OAP Hall
3.00pm – 8.00pm - Beaufort Terrace, Badminton

Thursday 11th December Garnlydan Info Shop
5.30pm –7.30pm - Queensway, Garnlydan

To find out more phone the Planning Policy team on (01495) 354740 / 355538 / 355544
or email planningpolicy@blaenau-gwent.gov.uk

To view the Preferred Strategy visit our website www.blaenau-gwent.gov.uk, your local library, the Civic Centre, Blaina District Office, Business Resource Centre or C2BG outreach venues

Appendix 7 (b) – An example of a Poster advertising an Exhibition

Appendix 8 – List of Posters displayed in each ward

Exhibition Date and Venue	Number of Posters Displayed throughout ward
Tuesday 11th November Brynmawr Library	19
Wednesday 12th November Venue 1 (Kidz R Us), Park Place, Georgetown	18
Thursday 13th November Swffryd Community Centre	12
Friday 14th November Tesco, Abertillery	10
Saturday 15th November Tesco, Ebbw Vale	20
Monday 17th November Cwm Info Shop	10
Wednesday 19th November Abertillery Leisure Centre	16
Thursday 20th November Llanhilleth Institute	7
Friday 21st November Parc Bryn Bach	17
Monday 24th November Blaina Integrated Children's Centre	14
Tuesday 25th November Rassau Community Centre	14
Wednesday 26th November Six Bells Community Centre	14
Thursday 27th November Ebbw Vale Library	15
Saturday 29th November Lakeside Retail Park	11
Tuesday 2nd December Tredegar Library	14
Wednesday 3rd December Beaufort Hill Welfare Hall	17
Thursday 4th December Badminton OAP Hall	11
Thursday 11th December Garnlydan Info Shop	11

Appendix 9 – Welsh Assembly Government's response to Preferred Strategy

Lynda Healey
Development Plans Manager
Blaenau Gwent CBC
Regeneration Division
Business Resource Centre
Tafarnaubach Industrial Estate
Tredegar
NP22 3AA

Eich cyf • Your ref LFH/19.4
Ein cyf • Our ref A-PP030-01-001

Date **18 December 2008**

Dear Ms Healey

BLAENAU GWENT COUNTY BOROUGH LOCAL DEVELOPMENT PLAN 2006-2021: PREFERRED STRATEGY REGULATION 15 CONSULTATION
WELSH ASSEMBLY GOVERNMENT RESPONSE

Thank you for consulting the Welsh Assembly Government regarding the Blaenau Gwent Local Development Plan pre-deposit documents. We are pleased to see progress being made in furthering a development plan for the area.

It is for the statutory consultation bodies and their equivalents to contribute to Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment exercises and your expert group to help you assess if they are fit for purpose.

As always, we would urge you to seek your own legal advice to ensure that you have met all the procedural requirements, including screening for SEA, because responsibility for these matters rests with your Council.

In respect of the other pre-deposit documents we would refer firstly to the new approach to examining LDPs and the way we address this stage of pre-deposit documents involving the preferred strategy, options and other background material from a policy perspective. Please note that there will be a need to obtain and consider advice and representations from other relevant Assembly Government Divisions regarding candidate site proposals or aspects of detailed site assessment.

In the past our comments at UDP pre-deposit draft stage would have been in the form of specific objections to policy omission, relevance or wording which, if not addressed at deposit or pre-inquiry changes, would be considered by the Inspector in arriving at the recommendations in the Inspector's Report.

Under the new system, the responsibility rests with the local planning authority to ensure that a submitted LDP is sound in procedural terms and enshrines the principles of early community engagement, transparency, consistency, coherence and compatibility to neighbouring authorities. If these principles have not been addressed adequately at the earliest stages of preparation, then the deposit LDP may be considered unsound and unfit for examination.

Without prejudice to the Minister's discretion to intervene later in the process and to the independent examination, the Assembly Government is committed to helping local planning authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of document preparation, and particularly at the Regulation 15 pre-deposit consultation stage.

To do this, the Assembly Government looks for clear evidence that the ten tests of soundness (as set out in 'LDP Wales' and the 'LDP Manual', and explained further in guidance issued by the Planning Inspectorate) are being addressed.

Having considered all the submitted documents provided by Blaenau Gwent CBC under Regulation 15, we acknowledge the amount of work undertaken by the authority to reach this stage. We also appreciate that the LDP system is new and that authorities are having to learn as they progress.

To ensure your authority secures a sound plan in due course, we have provided a strategic assessment of the Preferred Strategy document (as supported by the other documentation you have provided). We have indicated where evidence of soundness is not immediately clear. The annex to this letter sets out the detailed comments of the Assembly Government on the Preferred Strategy document; some comments relate to more than one test of soundness and we have provided cross-references where most appropriate.

We have noted some areas of concern, both where the documentation has not made clear certain matters, as well as in relation to certain strategy and policy issues. We consider that on-going self-assessment by the authority throughout the process of LDP preparation is important but would note that it hasn't, at this stage, been evidenced to us (as recommended at para 6.5.1 of the LDP Manual). We consider that you need to address some substantive matters, as outlined below, well before you produce a deposit plan:

- Provide clear links between the **evidence base** (including availability of evidence) / contextual background studies and the robustness of the preferred strategy, both within the plan area and within the wider region; greater evidence in relation to the **deliverability** of the strategy is required.
- Clarify and evidence that all the options for increasing the **affordable housing** target have been explored, and clarify the reasons for and viability of the thresholds chosen to deliver affordable housing.
- **Minerals safeguarding** (aggregates and coal) must be taken into account in the strategy at an early stage.
- Ensure adequate consideration and assessment regarding **renewable energy** is evidenced.
- The deposit plan will need to be **flexible** enough to respond to circumstances such as emerging regional work (WSP, RTP, etc.) and evolving national / regional population /

housing numbers and to include **contingency** approaches if the private sector are unable to deliver or the planned infrastructure required cannot be funded.

- Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies.

Providing that data exists and work has been undertaken where apparent gaps in the evidence base have been identified, we believe that much of this advice can be accommodated by refining and including emerging background material, for the deposit plan and its supporting documentation. This should not delay deposit plan preparation and should improve the prospects of the plan being deemed sound.

You should document your response to our comments in your Consultation Report.

To assist your authority in taking forward the LDP, we would be happy to meet with you and your colleagues to discuss our response in the new year. If you have any queries in relation to the response, please contact Elaine Ancrum (on 029 2082 3710) or myself.

Yours sincerely

Mark Newey
Joint Head of Plans Management and Performance Branch
Planning Division

(enclosure – annex)

-(We note that a SELF-ASSESSMENT based on the soundness tests has been PROVIDED at Preferred Strategy stage (at Appendix2 Statement of Conformity); LDP Manual 6.5.1)

P1 - Prepared in accordance with the Delivery Agreement including the CIS

Comments	**Suggested Actions**
We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies (page 78).	N/A

P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)

Comments	**Suggested Actions**
SA/SEA: We note that: - paras 1.4/5 of the Preferred Strategy advises that it has been subject to SA/SEA ; supporting documentation (prepared by Atkins) is the *Initial Sustainability Appraisal Report (ISAR)* (Nov'08), (+*Draft SA/SEA Scoping Report Nov'07*). The ISAR is subject of current consultation. **Habitats Appropriate Assessment (HRA):** We note that: - the Preferred Strategy has undergone the first key stage (screening for likely significant effects) of the HRA assessment in discussion with CCW; - para 1.6 of the Preferred Strategy advises that it has been subject to HRA (we note that the SA/SEA & HRA are running in parallel but are clearly distinguishable); supporting document	N/A

is the *Habitats Regulation Assessment Screening Report, Nov'08* which is subject of current consultation. - the HRA Screening Report advises that:- there are no European sites within the LPA of Blaenau Gwent (para 3.7); consideration has been given to the 9 European sites identified within a 15km search area around the LPA boundary (para 3.9); consideration of the strategic policies found that 3 policies (SP1,8,11) proposed development that may have significant effects at the European sites(para 3.14) – a precautionary approach is therefore required and it is concluded that further work is required in relation to 2 sites (Cwm Clydach Woodlands, Usk Bat Sites) (para 4.4).	Typo at para 3.20 of HRAScreening Report – 9 sites rather than 8?

C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.	
Comments	**Suggested Actions**
We note that section 3 of the preferred strategy aims to provide the national, regional and local context for the LDP and refers to a number of the key **relevant plans, policies and strategies:** ***National:*** One Wales'07, NAW SD Scheme '04, WSP People, Places, Futures '08Update (SE-Capital Network), PPW & CG, MPPW, MIPPS, Circulars, TANs. ***Regional:*** Heads of the Valleys Strategy (HOV)-*Turning Heads* '06; SE Wales Regional Transport Plan '08draft; SEW Regional Waste Plan; S Wales Rgnl Technical Statement on Aggregates; Regional Housing Apportionment '03 based (SEWSPG); ***Local:*** BlGw Community Plan 'proud past, bright future''05-'09; Draft Health Social Care and Well-being Strategy 'Healthier Future'; Draft Children & Young People's Plan for BlGw 08-11; Draft BlGw Regeneration Strategy; BlGw Local Housing Strategy 'Quality Streets' '07-'12; Local Biodiversity Action Plan '01-'06.	No reference is made in the regional context to neighbouring adopted & emerging development plans. We note that the evidence base is not complete (the timing information provided at

BlGw LDP Evidence Base (14) – Employment Land & Premises '07, Retail –HoV Project '08, annual Town Centre Surveys '08, Housing Market Assessment '07, Gypsy Traveller '07, LANDMAP SLA designation -in prep, annual Joint HLAS'07, HoV Greenspace Provision '07, Rec & Open Space –in prep, Ebbw Vale Northern Corridor –in prep, Aggregates Safeguarding –to be commenced, Waste Site selection –to be commenced end'08. The ISAR (section 3 & Appendix B) also contains the review of Relevant Plans & Programmes Section 9 refers to supporting information: Issues Paper (July 2007), Report of Consultation on the Issues Paper, Draft SA/SEA Scoping Report, Report of Consultation on the Issues and Vision Workshop, Report of Consultation on Vision and Strategy Options (19th Oct 2007), Report of Consultation on Vision and Strategy Options (22nd Nov 2007), Report of Consultation on Vision and Strategy Options (30th Nov 2007), Report on the development of the Vision, Report on the development of the Options, Candidate Site Register, Initial Sustainability Appraisal Report, Habitats Regulation Assessment Screening Report **Relationships:** Whilst some references are made to some joint working with neighbouring authorities (e.g. housing apportionment waste, gypsy & travellers), the Preferred Strategy document at section 3 gives little indication of the place of Blaenau Gwent within the wider region and of the general relationship with various plans and policies of neighbouring local authorities. Key linkages and influence on the Preferred Strategy need to be clarified. (Note that the soundness self assessment at page 79 says the PS has regard to the cross-boundary issues emanating from the emerging LDP strategies of adjoining Las and has taken into account regional work for example on waste, minerals and housing.)	para 3.33 is helpful). Ensure appropriate evidence is available and its influence in developing and supporting the strategy is clear (including if studies arrive at differing conclusions from those that have formed the basis for the draft preferred strategy). Ensure that it is clear how the contextual strategies have influenced the Preferred key neighbouring authorities in particular Ensure evidence is provided on the areas of joint working identified both within the authority and external organisations.

C2 It has regard to national policy.

Comments	Suggested Actions
LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1). *N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2*	**See comments under soundness tests CE1 & CE2**

C3 It has regard to the Wales Spatial Plan	
Comments	**Suggested Actions**
Paras 3.4 –12 specifically refer to the framework setting role of the WSP ('08 update) & the South-East Capital Network Zone. The Preferred Strategy appears generally to provide a good fit both with the Wales Spatial Plan vision for South East Wales and the area work. One exception to this is that there is little mention of the role of Blaenau Gwent within the networked city region envisaged by the Spatial Plan, and there is little mention of Blaenau Gwent's interface/collaboration with its neighbouring Local Planning Authorities. *See also further comments under Soundness Tests CE1 and CE2.*	Provide clarification in support of the strategy of Blaenau Gwent's role within the networked city region, and the interface/collaboration with neighbouring LPAs. Para 3.5 – suggest adding Rhondda Cynon Taf and Monmoushire to the specified neighbouring authorities, as they are also part of the SE Spatial Plan Area. Para 3.6 –the correct term to use in the first line is the South East Wales Area Strategy rather than the South East Development Framework, which was the term

	used while the Spatial Plan was still in draft.

C4 - Has regard to the relevant community strategy/ies.	
Comments	**Suggested Actions**
Appears to do so; paras 3.22-25 identifies the community plan, and the soundness self-assessment says that the PD has been prepared in the context of the Community Plan; para 4.5 clarifies that the LDP vision is not the CP vision.	To note.

CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities ***&*** **CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base**	
Comments	**Suggested Actions**
The Preferred Strategy documentation should make clear what the **key issues** are that the LDP will address, what the plan **vision** is, what the plan **objectives** are, what **strategic spatial options** were considered and what the **preferred spatial strategy** is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at sections 4 to 6. The preferred strategy document is generally clear and coherent and the structure of the document properly reflects the logical flow from context and challenges faced to issue identification, through to vision, objectives, options, to preferred strategy and strategic policies.	Whilst the information on preparation is very useful for this consultation stage, the deposit plan will need a more succinct

- Section 2 provides a useful **spatial profile** with some good, clear and relevant information. - Section 3 summarises the **regional and local planning context**, as well as other strategies which have been used to inform the preferred strategy. There are useful "spatial dimensions" included such as the health strategy, children and young people's plan, and Biodiversity Action Plan, all of which should usefully inform the LDP production. (& see comments at C1 above) - Section 4 gives the **key issues** and appears to provide a focussed small number of key critical land-use issues for the plan area. - The LDP **vision** (para 5.1) is clear and distinctive for the LDP; the process for arriving at it through workshops and consultation is also clear (paras4.5-6). The opening words of the vision recognise that the Council cannot deliver the stated objectives in isolation (rather it will be "Through collaborative working…."), this could be supported by further information with regard to whom and on what the Council will collaborate would be a useful addition. - The LDP **objectives** (para 5.2) are distinct from the SA objectives (ISAR pages1-3); they appear reasonable and succinct in their coverage of the issues identified in section 4. Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered. - The summary analysis of the development of the **strategy options** (i.e. 1. regeneration – continuation of UDP strategy, 2. growth and regeneration, 3. balanced and integrated communities) is useful and generally informative). The **preferred strategy** (and **key diagram**) (sections 6) appears to be broadly relevant to the area and is land-use. Some clarification for the selection and development of the preferred option (growth and regeneration) are provided (at paras 4.21-25 & Appendix 1) and seem generally reasonable in terms of the SA, local context, and WSP / HoV Strategy context. However, it is not made clear in the main text of the document why Blaina was included as a district/local shopping	format. **Vision** – supporting information with regard to whom and on what the Council will collaborate would be a useful addition. Consider developing into SMART **objectives** to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required. **PMP** Ensure that there is clear evidence supporting Blaina's status in the finalised draft **preferred strategy**. Ensure that the deposit plan

centre by the LDP Forum and Steering Group (para 4.25); - note that the text at Appendix1 page 76 gives one of the disadvantages of the original option 2 as loss of status / decline of Blaina. It is not clear if there are any strategic sites proposed within the plan area.	clearly identifies any **strategic sites**.
- Section 3.33 lists **background studies** that are intended to provide an **evidence base** to the preferred strategy and will inform the subsequent deposit plan; other supporting documents are listed separately in section 9 (see at C1 above). A number of studies in the evidence base are not yet completed or have not been made available with the PS documentation.	**Background documents** need to be available asap to ensure they can input into the development of the LDP. The deposit plan must be supported and influenced by an appropriate sound evidence base. If any fundamental aspects of the Strategy change when the evidence is finalised, the documentation must make clear where such changes occur.
- The **strategic policies** (section 6) appear to be well aligned to the objectives and the chosen strategy option; they usefully provide clear links to the objectives; however, the supporting text should be developed further in the deposit LDP to indicate delivery mechanisms and timescales for implementation, and the package of policies in the deposit plan should provide greater detail*. (See also comments below on monitoring and implementation framework)*	Ensure the **policie**s in the deposit plan are supported by information on delivery mechanisms and implementation timescales.
- A **monitoring framework** is at section 7 which sets out targets and indicators as a basis for assessing the effectiveness of the strategic objectives. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. At present it doesn't provide any targets/indicators relating to SP18 Minerals and SP19 Waste which have not been linked to the strategic objectives. A developed framework should include strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. *(Also see below on Preferred Strategy – deliverability and flexibility; and at Test CE3 below)*	Ensure the **monitoring and implementation framework** will be satisfactory for measuring the effectiveness of the plan strategy and policies.

- Consideration should be given to broad **phasing** for developing housing and employment land over plan period. Note that there is some indication in relation to housing (policy SP8); but at this stage it is not area or site-specific. - Clarification of how the site assessment process (through the **candidate site methodology**) will work is provided (section 8); the methodology indicates a 6-stage assessment of all 159 candidate sites which were submitted between April and June '07, with sifting out of unsuitable sites at stages 1 and 3. - A programme for preparation of **SPG** (including development briefs and masterplans) is provided at para 8.19; the status for some is given as 'approved - but will be revisited', from which it is assumed that this was provided in relation to the UDP - it is important that the SPG is specific to the LDP.	To consider **phasing**. Ensure **SPG** is specific to the LDP.
Preferred Strategy - **deliverability and flexibility** (also see above on Monitoring and Implementation Framework). Whilst there is an indication of the type, scale and location of development required to achieve the strategy, the **deliverability** of the preferred option needs greater clarification in the deposit plan. Para 4.25 refers to flexibility in the housing and employment land requirements as a response	The deposit LDP will need to develop further the type, scale and location of development required to achieve the strategy. Particularly important will be ensuring that the significant developments identified can be delivered, and providing the timescales that are proposed for this delivery. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.

to the current economic climate. The deposit LDP should be sufficiently **flexible** to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.	Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.
Paragraph 2.8 contains useful information on why the 3 valleys have been divided into **4 areas** following a functional analysis.	
Location of Growth (page 46 & **polices SP1,2&3**) The strategy as reflected in these policies seeks growth and regeneration in the Heads of the Valleys area, regeneration in the south and the creation of a network of sustainable linked communities to spread regeneration benefits.	The deposit plan should clarify what 'regeneration' means for Blaenau Gwent. Clarification of when regeneneration proposals should be delivered should be provided. (*see monitoring & implementation*) The supporting text should clarify what is meant by 'hubs'. Are they the district and local hubs?
Sustainable Development (page 47 & **policy SP4**) Gives requirements in relation to new development. It is not clear in the SEA/SA Report (ISAR) how the new policy SP4 has been assessed against SEA/SA objectives, given that this policy is one of the new proposed policies arising from the SEA/SA process. For reference Table F assesses the emerging policies but SP4 Sustainable Development (including SP13 and SP14) have not been assessed.	To clarify
Retailing and Town Centres (page 47 & **policy SP5**)	

Policy SP5 (Retail Hierarchy) and para 6.6 defines a new retail hierarchy (with roles and functions) based around Ebbw Vale as a sub regional centre. Complementary uses such as tourism and recreation are considered in conjunction with retail. Whilst the retail strategy flows logically through the Preferred Strategy and appears reasonable, the lack of accessible **evidence base** (i.e. listed at para 3.33 but not available on the web-site) means it is difficult to assess how robust that strategy is. A précis of the **action plans** mentioned in para 6.7 should be provided. Given that new developments are proposed some indication of the amount of **floorspace** envisaged during the plan period is required for both comparison and convenience goods.	The deposit plan and its evidence base should provide clarity about the retail hierarchy, town centre regeneration schemes and floorspace.
Employment (page 48 & **policies SP6&7**) **Policy SP6** (Employment & Diversification of the Economy) Objectives and strategic policies logically flow from evidence base in the Employment Background Paper and the strategy employed given the preferred option is explained. Whilst the evidence base considers the movement of workers between Blaenau Gwent and surrounding authorities it is less clear whether discussions have taken place about neighbour authority allocations or employment strategies. The Preferred Strategy does not appear to identify any strategic employment sites (which would normally be expected at this stage). However, it does make clear the intention to de-allocate some large employment sites in the northern end of the County Borough that are no longer appropriate to the future strategy, which is based around the main urban areas and is therefore more sustainable. Consultants URS estimate a need for 50ha's, made up of 16.4ha (which included a 50% uplift on their initial forecast – para 5.13) plus a buffer of 34 ha for churn (para5.14 & Table 16 of Background Paper). The Blaenau Gwent Regeneration Strategy (2008) and Blaenau Gwent Community Plan aim to increase activity rates from 66% to 71%, which equates to 80ha's of land (para 6.11 of Background Paper). These aims are reflected in the LDP Preferred Strategy and a range of 50 to 80 hectares of employment land is proposed at this stage in order to provide flexibility given the current economic climate (para 4.25).	The deposit plan and its evidence base should: - clarify relationships with neighbour authority employment strategies / allocations; - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - clarify the inter-relationship between housing and

In the Preferred Strategy, apart from the 50-80ha of land set aside for employment purposes, there is little detail with regard to 'general' employment. The accompanying text is quite informative with regard to tourism but other aspects are less detailed. It would have been beneficial to have some indication of where the 50-80ha of land are and to what specific purpose they are to be allocated. Paragraph 6.14 and the sixth bullet point under Employment' fails to reflect the current economic climate in which the construction sector is not growing. CIL would not lend itself to the purpose stated. Note that potential waste allocations on employment land are identified in SP19, and that the evidence base for waste assessment is scheduled to begin at the end of 2008. There does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring authorities; nor any discussion of how any under provision and proposed 'backloading' of the housing requirement (policy SP8 and para 4.24) may have implications for take up of employment land allocations. **Policy SP7** (Development of the Tourism & Leisure Sectors) needs redrafting for clarity; it also appears to be very broad and general and could benefit from the addition of some of the detail form para 6.10.	employment land allocations within the plan area and with neighbouring plan areas. Consider redrafting SP7
Housing (page 50 & **policies SP8,9&10**) **Policy SP8** (Housing Provision) The Preferred Strategy references Ministerial Interim Planning Policy Statement 01/2006, *Housing*, by accepting the SEWSPG work on regional apportionment (para3.19ff & Background Paper para 2.17ff). The Background Paper on 'Population and Housing' provides details of the Council's own growth forecasts and considers alternative options for future development. Policy SP8 provides for a range of between 2250 and 3000 dwellings and para 4.25 advises that this is in order to provide flexibility given the current economic climate; it would have been useful to clarify this within the supporting text of the policy itself. The figures	The deposit LDP the should: - provide robust housing figures which are adequately evidenced; - clarify the inter-relationship between housing and employment land allocations

given for the breakdown into HMAs only reflect the higher end of the range, whilst the delivery figures in the policy which do reflect the range have not been broken down between the HMAs. It is likely that the delivery of the 1450 dwellings on sites permitted or under construction will need to reconsidered given the current downturn in the housing market. It is not clear if there are any key strategic sites upon which the strategy depends. There does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring authorities **Policy SP9** (Affordable Housing) The Preferred Strategy takes account of the housing need identified by the authority's Local Housing Market Assessment, while stating that it would not be feasible to meet this need within the life of the Plan given current build rates and due to the number of committed sites that do not have requirements for affordable housing (para 6.14). The Plan establishes an affordable housing target which takes account of these factors and the limitations on the ability of the planning system to deliver affordable housing. However, it is not clear whether all the options for increasing the target have been explored, for example reducing the threshold in areas of greatest need, where this is economically viable; or reviewing sites in the land supply to assess whether they are now likely to come forward or could be brought forward. It is also not clear whether the target will be delivered by the proposed threshold of 10 units and the site target of 25%, given that about 70% of the Plan's housing requirement is to be delivered on committed sites and sites of less than 10 units. Paragraph 6.18 states that affordable housing will be delivered on a *small number of 100% affordable sites, where appropriate.* Without any precise definition / location for the small number of 100% sites, affordable housing provision is effectively restricted to the 800 new site allocations of 10 units or over, as paragraph 6.18 makes it clear that most of the 1.450 committed units are not classifiable as affordable housing. This paragraph also states that between 600-800 affordable housing units are required during the plan period (which is a rather vague and wide spread of figures), which given that the majority will have to be found in the new allocations of 800 units casts considerable doubt as to validity and deliverability of the policy.	within the plan area and with neighbouring plan areas; - clarify and evidence that all the options for increasing the affordable housing target have been explored; - clarify the reasons for and viability of the thresholds chosen to deliver affordable housing.

Policy SP10 (Gypsy Accommodation) Paras 3.33 and 6.19 refer to the Gypsies-Travellers Study (June'07) but it has not been made available.	Ensure supporting evidence base is available.
Transport (page 52 & **policies SP11&12**) The Draft Regional Transport Plan is referenced at para 2.13; the transport section of the strategy should show clear links to the Regional Transport Plan where applicable. Paragraph 2.36 – see the DFM's announcement on road and rail priorities on 2nd December. Paragraph 6.22 - it is not clear why the strategic and core road hierarchy has not been defined at this stage of plan preparation. **Policy SP11** (Transport Infrastructure Improvements) It is not clear as to how may of the proposals are deliverable in terms of a realistic likelihood that the necessary finance is, or will be, available and committed.	The deposit LDP should reflect the RTP and provide clarity on deliverability.
Community Infrastructure (page 53 & **policies SP13,14&15**) **Policy SP14** (Health & Education) This policy fails to indicate where provision will be made. **Policy SP15** (Planning Obligations) Consideration of potential developer contributions and the economic viability of development sites needs to be considered in relation to impact on aspects of the associated infrastructure, especially on the provision of affordable housing. The deposit LDP should clarify main obligations related to specific allocations.	The deposit LDP should provide sufficient clarity on location and deliverability.
Built and Natural Environment (page 54 & policies **SP16 & 17**)	

Historic Environment Cadw consider that whilst the Preferred Strategy document has an objective and policies to protect, enhance and manage the built environment, some aspects that relate to the historic environment could be improved: - clarification of what is meant by 'built environment' (policy SP17) and whether this encompasses the overall historic environment; - the plan objectives to encompass protection and enhancement of the overall quality of the historic, natural and built environment of the County Borough; - strategic policy to cover the protection, maintenance, enhancement and positive management of the natural and built heritage in the consideration of all development proposals within the rural and built environment; - in addition, in the deposit plan a borough wide policy to cover protection and enhancement of the Borough's historic assets and their settings. In addition, the register of listed buildings 'at risk' is not produced by Cadw but is the responsibility of the local planning authority (para. 2.46).	To consider.
Landscape The relationship between protecting the landscape, and the proposed volume and location of development (including residential, tourism etc), could be explored further in the deposit plan. The forthcoming SLA study (para 3.33) and designations should influence the location of development through the candidate sites process. The deposit plan should set out appropriate policies for landscape and/or SLA (if to be designated), stating (where appropriate) the features or characteristics that require special protection, and how the policies will achieve this. The importance of local landscape character should be considered, possibly as part of strategic policy SP17, as a complement to SP16's concern with the designated landscape.	To consider.
Biodiversity Under the Natural Environment & Rural Communities Act (2006) the CBC has a biodiversity duty in the form of the necessity to promote biodiversity across the full range of local authority functions, so far as is consistent with the proper exercise of those functions.	To note and consider.

We note the intention to increase the number of SINCs, the recognition within the LDP of the protection and enhancement of ecological resources and biodiversity as a challenge to be overcome, and, the commitment to protect, enhance and manage the diversity of the biodiversity resources of Blaenau Gwent through the identification of ecological corridors. Para 8.19 refers to Biodiversity Supplementary Planning Guidance being in preparation; this should elaborate further on how the principles are to be applied in practice. The Expert Assessments by Ecologists at stage 2 of the Candidate Site Methodology (section 8.7), should consider the potential for the presence of European Protected Species.	
Minerals (page 55 & **policy SP18**) **Policy SP18** (Minerals) Policy SP18 should refer to known 'resources' rather than 'reserves'. The 'relevant environmental, planning and transportation considerations' which will affect safeguarding are not clarified within the policy; they must accord with national guidance. **Aggregates** Para 33 makes it clear that the Aggregates Safeguarding study is in preparation. Policy 18 needs to accord with Regional Technical Statement on Aggregates in that resource allocation of 3million tonnes of hard rock should be provided in the LDP and the use of secondary/recycled aggregates promoted (para 3.18 refers). There is a lack of evidence base on landbank figures, amount of dormant mineral permissions, and proposals for restoration. Deposit plan must include Buffer Zone policies. **Coal** Para 6.31says *Coal resources will also be safeguarded where availability or reserves can be demonstrated.* In the deposit LDP the safeguarding should be in line with the Coal Minerals Technical Advice (MTAN2) when issued in final form, (at present with the second consultation on the DraftMTAN2). The proposals map should show the areas where coal working will not be	The deposit plan must: - adequately safeguard mineral resources in line with national policy; - adequately provide for the contribution to aggregates production over the plan period identified in the RTS; - include Buffer Zone policies.

permitted over the plan period, with consideration being given to making reference to this in the minerals policy. Note the statement at para 6.31 that as most new development will be within the existing urban areas the strategy is not affected by the need to protect coal resources; however, the presence of coal resources should have helped shaped the strategy. Safeguarding of minerals should be consistent across boundaries with neighbouring authorities.	
Waste (page 54 & **policy SP19**) **Policy SP19** (Waste) Para 3.33 makes it clear that the evidence base document is in preparation, and para 6.32 that the Council has still to decide which option from the Regional Waste plan it will pursue. Whilst generally on the right track, the deposit plan must clarify the regional search criteria and how Council intends to implement the "sustainable integrated approach" contained in the policy. The supporting text should have confirmed that provision of sites in policy SP19 will provide capacity for an adequate network of facilities, therefore demonstrating that a genuine choice of suitable sites exists and that the B2 locations have enough capacity to accommodate facilities identified as being needed through the Regional Waste Plan.	Ensure deposit plan is sufficiently robust.
Climate Change While Climate Change is given due consideration in the draft Preferred Strategy brief further explanation of how the LDP responds to the effects of Climate Change on the county and how this will affect the strategy is recommended for the deposit plan. Further detail would also be expected on adaptation in order to explain further how Objective 14 will be met.	Ensure clarity in the deposit plan.

Renewable Energy It is disappointing to discover that, despite evidence in para 2.58 that Blaenau Gwent uses a higher share of gas domestically when compared with the regional average, little is being proposed to remediate this in terms of the provision of renewable energy. National policy as contained in the Ministerial Interim Planning Policy Statement and TAN 8 encourages the use of renewable energy and requires local planning authorities to facilitate the development of all forms of renewable energy. The MIPPS states that local planning authorities should undertake an assessment of the potential of all renewable energy resource, renewable energy technologies, energy efficiency and conservation measure and include appropriate policies in LDPs. The Preferred Strategy document does not appear to have followed this approach and there is little consideration of the role and impact of renewable energy in the plan and it does not appear to form part of the core strategy of the plan. The deposit LDP should contain policies for the provision of renewable energy, as outlined in TAN 8, and without consideration at this earlier stage there is a danger that the issue will be an add-on to the plan.	To ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.
Water and flooding: (Para 2.55) The general approach taken towards flood risk is appropriate and it is assumed that sites in zones C1 and C2 will be excluded during the candidate sites assessment.	To note and ensure.
Water infrastructure (Para 2.53-54) It is stated that sewerage capacity exists to support the preferred strategy. It is therefore assumed that evidence is available to support this statement. The deposit plan should also address the issues raised in the preferred strategy in relation to increased demand for water. Early engagement with Dwr Cymru will provide useful information on the deliverability of development in terms of infrastructure provision.	Ensure adequate evidence. The deposit plan should address the issues in relation to increased demand for water. Early engagement with Dwr Cymru.
Land contamination: It is not clear whether this will be a significant issue in terms of delivery. National planning policy advises that the nature, scale and extent of contamination, which may pose a risk to human health, should be considered as part of plan preparation to ensure that	

development is not undertaken without an understanding of the risks. Some understanding of the scope to overcome any actual or potential contamination may be a necessary part of understanding the risks if this is to impact on delivery.	
A**gricultural land** There are no issues of consistency with the national planning policy requirement to conserve the **best and most versatile agricultural land** (PPW para 2.8.1).	To note
Design Assume that deposit plan will clarify if there are parts of the area that need specific LPA guidance regarding what will be required in design statements (e.g. town centre), and any information on SPG (development briefs, masterplans etc).	Consider for deposit plan
Welsh Language Paras 2.31-32 - consideration appears to have been suitably given to whether the Welsh language should feature in any of the LDP objectives, taking account of PPW paragraph 2.10.2.	

CE 3 There are clear mechanisms for implementation and monitoring	
Comments	**Suggested Actions**
A **monitoring framework** is at section 7 which sets out targets and indicators as a basis for assessing the effectiveness of the strategic objectives. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. At present it doesn't provide any targets/indicators relating to SP18 Minerals and SP19 Waste which have not been linked to the strategic objectives. A developed framework should include strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. *(as stated at monitoring at Test CE1/2 above; also see*	Ensure the **monitoring and implementation framework** will be satisfactory for measuring the effectiveness of the plan strategy and policies. (+ see LDP Manual para 9.5)

above on Preferred Strategy – deliverability and flexibility at Test CE1/2.)	

CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	**Suggested Actions**
Until the monitoring arrangements are properly specified it is difficult to assess how responsive the plan might be to changing circumstances. Monitoring evidence should help inform or initiate future amendments or reviews.	Ensure that the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic take up and other changes.