

Blaenau Gwent County Borough Council
Cyngor Bwrdeistref Sirol Blaenau Gwent



Consultation Report - Review
Adroddiad Ymgynghoriad - Adolygiad

Local Development Plan Review
Adolygiad y Cynllun Datblygu Lleol

June / Mehefin 2017
www.blaenau-gwent.gov.uk

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1.0 INTRODUCTION

Need for a Full Review of the LDP

- 1.1 In November 2016, Blaenau Gwent County Borough Council commenced work on a full review of the adopted Local Development Plan (LDP) in order to ensure that the LDP remains up-to-date. The full review will culminate with the production of a review report which will set out what has been considered, which key stakeholders have been engaged and what needs to change and why.

What Form of Revision is required?

- 1.2 The review report must also make a conclusion on how the LDP should be revised, which can be either through a short form revision or a full revision procedure. In order to determine the type of revision procedure to be followed, consideration needs to be given to a number of factors, including the findings of preceding AMRs, significant contextual changes and updates to the evidence base. The views of key stakeholders can also make an important contribution to the deliberations on how the LDP should be taken forward.

Stakeholder Consultation and Workshop

- 1.3 In order to obtain the views of key stakeholders, a Discussion Paper was prepared and placed on consultation between 8th June and 6th July 2017. Key stakeholders were also invited to a workshop which was held on 21st June 2017.

Purpose of this report

- 1.4 The purpose of this Consultation Report is to record and analyse the views of stakeholders that attended the workshop and the comments received as part of the consultation exercise. These views have contributed to preparation of the Review Report and have helped inform the Council's decision on the LDP revision procedure to be followed.

2.0 STAKEHOLDER WORKSHOP

2.1 The purpose of the stakeholder workshop was to:

- share information on the full review of the LDP and the work undertaken to date;
- provide stakeholders with the opportunity to share their views on the Discussion Paper, particularly in respect of relevant contextual changes, key findings, suggested changes to the LDP and the approach to revising the LDP; and
- address any queries and questions.

2.2 Invitations were sent to a wide range of relevant stakeholders, including local organisations and agencies that operate or have an interest in Blaenau Gwent and specific consultation bodies, such as Natural Resources Wales and Dwr Cymru / Welsh Water (see Appendix A for the full list of stakeholders invited). Thirteen stakeholders attended the workshop along with four members of the Development Plans Team. A full list of attendees is provided in Appendix B.

2.3 As an introduction to the workshop, Lynda Healy (Team Manager - Development Plans) welcomed stakeholders before Justin Waite (Principal Planning Officer) gave a presentation (see Appendix E) on the LDP full review process and the main preliminary findings and recommendations within the Discussion Paper. Attendees were also offered the opportunity to ask questions relating to the presentation before Lynda Healy set out the purpose of the workshop session (see Appendix D for the day's agenda).

2.4 The workshop session was arranged around two groups supported by a two officers who, collectively, sought to facilitate and focus the discussion and accurately record the comments (see Appendix C for the list of workshop groups). The discussion focussed on the questions set out in the Discussion Paper, which were grouped under three broad areas:

- Whether stakeholders agree with the suggested changes to the LDP and that the main areas of where the LDP is not working have been identified?
- Whether stakeholders agree that all issues have been considered or have some been missed?
- Whether stakeholders agree that it is appropriate to revise the LDP following the full revision procedure?

2.5 A summary of the discussions of each group under these three broad areas is provided below.

Whether stakeholders agree with the suggested changes to the LDP and that the main areas of where the LDP is not working have been identified?

Level of Growth

Group 1

- 2.6 There was consensus within the Group that the LDP's level of growth should be reconsidered. It was acknowledged that across Wales, Local Authorities are reconsidering the level of growth in their plans in response to the 2011 population projections being so different to the 2008 population projections.
- 2.7 It was, however, also highlighted that there remains a need to retain a level of growth aspiration in plans and regard should be had to what is happening locally, such as progress in bringing sites forward (e.g. Bryn Serth) and the implications of the Circuit for Wales. If the latter does go ahead, the Council should consider Anglesey and Gwynedd's approach to the Wylfa development. A flexible approach to site specific targets should also be explored.

Group 2

- 2.8 There were mixed views within the group over whether the LDP's high level of growth should be reconsidered. It was felt that there was sufficient brownfield land available and evidence of large sites coming forward; however, there was also a recognition that developers are reluctant to build in Blaenau Gwent and there is a need for stimulus to bring site forwards.
- 2.9 Alternative ways of bringing housing sites forward, such as self-build plots and community housing schemes, were identified and potential opportunities were highlighted, including the City Deal, Enterprise Zone designations and the Circuit for Wales.
- 2.10 The importance of having employment sites in the right location and the continued need for public sector support was also highlighted given that historically there has been little private sector investment. The Rhyd-y-Blew employment site was identified as an allocation that has good prospects of coming forward, due to its good transport connections.

Housing Requirement

Group 1

- 2.11 There was consensus within the Group that the LDP's housing requirement should be reconsidered in light of the Welsh Government's updated projections, although it was felt that any revised housing requirement should not be as low as the forecast.

Group 2

- 2.12 The Group agreed that the Welsh Government's household projections were an important consideration, but also indicated that the type of housing was also relevant. The need for the right type of affordable housing was highlighted and it was felt that better quality housing developments, supported by appropriate facilities, would attract people to the County Borough.
- 2.13 The implications of 'Brexit' on international migration rates were also highlighted as a factor that could affect future population/household projections.

Spatial Distribution of Growth

Group 1

- 2.14 The Group agreed that the Southern Strategy Area is constrained in terms of development opportunities. Alternative approaches to the focus of development were highlighted ranging from the location of brownfield sites to letting the market decide. Opportunities to focus development around future economic investment, such as the Circuit for Wales and Enterprise Zones, were also highlighted. The Vale of Glamorgan's LDP was suggested as an example of a plan that has based its housing on economic growth.

Group 2

- 2.15 There was general agreement within the Group that the majority of development should continue to be directed towards the Northern Strategy Area, although the distinction was considered too simplistic. Communities were considered to be interested in areas and towns and it was suggested that there are a lack of sites in certain places, such as Brynmawr. In broad terms, it was felt that allocations should be based on the need to marry development opportunities to where the stimulus will be, with a particular focus on sites with good transport connections.
- 2.16 In terms of service provision, there was recognition that areas should be treated differently and a general acceptance that Ebbw Vale will continue to be the focus for higher order services.
- 2.17 The need to consider biodiversity interests when determining the location of development was also highlighted and it was suggested that biodiversity is in decline as a result of reduced connectivity between sites of biodiversity value. Reducing growth and focussing on the re-use of vacant buildings would help address the connectivity issue. The benefits of biodiversity were also highlighted in terms of stimulating growth and increasing interest in an area.

Affordable Housing Target

Group 1

- 2.18 The Group highlighted the continued pressure from the Welsh Government to maximise affordable housing through LDPs, and it was noted that the Vale of Glamorgan has a requirement for a £15,000 contribution towards affordable housing on single dwellings.
- 2.19 The importance of an evidence base in supporting LDP requirements was raised and it was recognised that this can involve a significant amount of work. It was also suggested that consideration should be given to zoning affordable housing in areas.
- 2.20 In terms of the existing affordable housing stock, work is currently being undertaken to assess community sustainability and viability, and issues have been identified relating to a significant proportion of vacant housing being of the wrong type and/or located in the wrong place. These existing properties may need to be replaced.

Group 2

- 2.21 There was no overall consensus within the Group on whether the affordable housing target should be reviewed; however, the need to review mechanisms for securing affordable housing was highlighted. In particular, it was suggested that financial contributions could be more beneficial, making sites more attractive to national housebuilders.
- 2.22 Viability issues relating to the delivery of affordable houses were highlighted, which are the result of development costs being higher than rents and social housing grants. Problems in matching the type and location of social housing available with tenants' needs were also highlighted. For example, there are 3 bedroom properties currently available but there is a need for smaller properties. Consequently there are a large number of social houses currently vacant and consideration needs to be given to facilitating their adaptation/subdivision.

Town Centres

Group 1

- 2.23 The Group agreed that the approach to town centres needed to be reviewed, with reference made to the reconsideration of the town centre hierarchy, town centre boundaries and the primary shopping area. The use of local development orders was also identified as a mechanism for encouraging development and providing a clear statement that town centres are open for business.
- 2.24 It was also recognised that issues relating to takeaways remain relevant, particularly in respect of creating dead frontages and health impacts.

Group 2

- 2.25 There was general agreement within the Group that the approach to town centres should be reviewed, and that the degree of flexibility in allowing changes of use and town centre boundaries should be reconsidered. The clustering of A3 uses does, however, remain a concern in town centres, such as Blaina, and the LDPs current approach to restricting A3 uses should be retained.
- 2.26 There was also a view that Town Centres were not adapting to meet people's needs and that it can be appropriate for those needs to be met elsewhere.
- 2.27 Attention was drawn to the updated town centre strategy (due shortly), which should be used to inform future approaches.

Deliverability of Undelivered Allocations and Brownfield land and Housing Density Targets

Group 1

- 2.28 The Group indicated that sites needed to be analysed on a site by site basis in order to understand why they are not coming forward. In particular, sites that have been historically reallocated need to be scrutinised in order to ensure that they are viable and deliverable. It was also suggested that sites could remain within settlement boundaries but not allocated where there are uncertainties over their delivery.
- 2.29 It was recognised that additional upfront work was required by site proponents to demonstrate that candidate sites are deliverable and viable. It was, however, also acknowledged that the new requirements may cause difficulties for 'local developers' as they may lack the expertise to provide the information/evidence required. This could result in the planning policy team having to undertake the additional work.
- 2.30 Deliverability was considered to be a key consideration in preparing an LDP and judgments need to be made in terms of quality versus quantity of sites. Attention was drawn to Cardiff's LDP – which relies on key strategic sites coming forward – not having a five year land supply in the first year after adoption. As a consequence, it was advised that smaller, deliverable sites should also be allocated as larger sites can be held up by particular issues.
- 2.31 In term of guidance, it was recognised that the LDP manual provides clear guidance on viability and deliverability and it was recommended that regard be had to the recent work undertaken by RCT.

Group 2

- 2.32 There was general agreement that the deliverability of all undelivered allocations should be reassessed and there was a recognition that more upfront and detailed work is now required to demonstrate that sites are viable and deliverable. A benefit of this approach will be the removal of sites that are unlikely to come forward.
- 2.33 It was also indicated that any reassessment of brownfield sites should also consider their biodiversity/ecological value.

Main Areas of Where the LDP is Not Working

Group 1

- 2.34 The Group highlighted the need to consider open space requirements and drew attention to the decreasing Fields in Trust standard. It was also questioned whether the latter remains fit for purpose given the changing nature of children's play. Natural Resources Wales's recent work on mapping open spaces and access to them was also highlighted.

Group 2

- 2.35 There was general agreement within the Group that the main areas have been identified and no further areas for consideration were highlighted.

LDP Policy Effectiveness

Group 1

- 2.36 No comments were made by the Group on the preliminary assessment of individual policies. The following general suggestions were however made: a consistent approach to the wording of policies could be agreed and adopted by local planning authorities; appeal reports should be reviewed to identify any issues with policies; and all undelivered allocations should be reviewed in terms of deliverability.

Group 2

- 2.37 No specific comments on policy effectiveness were provided by the group. It was agreed that, if necessary, written comments could be provided as part of the consultation on the Discussion Paper.

Whether stakeholders agree that all issues have been considered or have some been missed?

Planning Policy, Evidence base and Other Contextual Changes

Group 1

- 2.38 The Group did not identify any additional issues for consideration, though they did make the observation that it was difficult to determine. The importance of being aware of new changes moving forward was also highlighted

Group 2

- 2.39 There was general agreement that the main changes to planning policy and the evidence base had been identified. The Welsh Government's 'Future Trends Report' was, however, also highlighted for potential consideration, along with National Development Framework when published.
- 2.40 In terms of contextual changes, the following issues/strategies were highlighted for potential consideration: the Welsh Government's Task Force for the Valleys, joint working with neighbouring authorities, issues experienced by neighbouring authorities and the City Deal's employment strategy.

Whether stakeholders agree that it is appropriate to revise the LDP following the full revision procedure?

Group 1

- 2.41 The Group agreed that the LDP should be revised following the full revision procedure and it was highlighted that the Welsh Government had recommended this approach to the majority of local planning authorities who were reviewing their LDPs.

Group 2

- 2.42 There was general agreement within the Group that the indicators were pointing towards the full revision procedure. The large shift in the economy since the start of plan period was recognised as being a significant factor in the LDP not delivering.
- 2.43 The preparation of a strategic development plan was also highlighted as a potential influencing factor on the method of revision, but it was acknowledged that it wouldn't be in place for a number of years.

3.0 STAKEHOLDER CONSULTATION

3.1 The purpose of the consultation on the Discussion Paper was to seek the views of key stakeholders on whether:

- the main areas of where the LDP is not working have been identified;
- they agree with the suggested changes to the LDP;
- all significant contextual changes and changes to the evidence base have been identified; and
- they agree with recommendation to revise the LDP following the full revision procedure.

3.2 In order to focus the consultation, the Discussion Paper contained 11 specific questions relating to various aspects of the above. An opportunity was also provided for further comments to be made, if necessary.

3.3 Invitations were sent to a wide range of relevant stakeholders, including local organisations and agencies that operate or have an interest in Blaenau Gwent and specific consultation bodies, such as Natural Resources Wales and Dwr Cymru / Welsh Water (see Appendix A for the full list of stakeholders invited). Six separate organisations/agencies provided a written response to the consultation and the comments received along with the Council's response is set out in Appendix F. A summary of responses received based on the eleven consultation questions is also provided below.

Question 1: Do you agree that the LDP's high level of growth should be reconsidered? If not, please set out why you believe that the current level of growth is deliverable over an extended plan period (up to 2036)

3.4 Of the four stakeholders who specifically responded to this question, three agreed that LDP's level of growth should be reconsidered, while one felt that the LDP should continue with the current aspirational level of growth.

Question 2: Do you agree that the spatial distribution of new development should continue to be split between the Northern Strategy Area and Southern Strategy Area, with the majority of development directed towards the former. If not, please identify alternative spatial strategies that could be considered.

3.5 Of the four stakeholders who specifically responded to this question, three agreed that the majority of development should continue to be directed towards the Northern Strategy Area. Although one stakeholder neither agreed nor disagreed with this question, the supporting comments provided also indicated a general agreement with the LDP's current spatial strategy.

Question 3: Do you agree that the affordable housing target should be reviewed based on a reassessment of the delivery and viability of housing allocations? If not, please explain why you believe the current target would be achievable over an extended plan period (up to 2036).

- 3.6 All four stakeholders who specifically responded to this questions agreed that the affordable housing target should be reviewed based on, amongst other things, a reassessment of the delivery and viability of housing allocations.

Question 4: Do you agree that the approach to town centres should be reviewed in order to ensure that they diversify and thrive? If not, please explain why you believe the current approach will be successful over the longer term?

- 3.7 Of the two stakeholders who specifically responded to this question, one agreed that the approach to town centres should be reviewed, while the other neither agreed nor disagreed.

Question 5: Do you agree that the deliverability of all undelivered allocations should be reassessed, and the targets for the percentage of development on brownfield land and housing density should be reconsidered?

- 3.8 All five stakeholders who specifically responded to this question agreed that all undelivered allocations should be reassessed, and the targets for the percentage of development on brownfield land and housing density should be reconsidered.

Question 6: Do you agree that the main areas of where the LDP is not working as intended have been identified? If not, please highlight other areas of the LDP that are not working well.

- 3.9 Of the three stakeholders who specifically responded to this question, one agreed that the main areas of where the LDP is not working as intended have been identified, while two neither agreed nor disagreed.

Question 7: Do you agree that the LDP's housing requirement should be reconsidered in light of the Welsh Government's updated population and household projections?

- 3.10 Of the four stakeholders who specifically responded to this question, three agreed that the LDP's housing requirement should be reconsidered in light of the Welsh Government's updated population and household projections, while one disagreed.

Question 8: Do you agree that the main changes to planning policy and the evidence base have been identified? If not, please identify other areas for consideration.

- 3.11 Of the four stakeholders who specifically responded to this question, one agreed that the main changes to planning policy and the evidence base have been identified, one disagreed and two neither agreed nor disagreed.

Question 9: Do you agree that the main contextual changes have been identified? If not, please identify other significant changes.

- 3.12 Of the four stakeholders who specifically responded to this question, two agreed that the main contextual changes have been identified, one disagreed and one neither agreed nor disagreed.

Question 10: Do you agree with the findings of the review of LDP policy effectiveness? If not, please identify which LDP policy you disagree with and explain how it should be taken forward as part of a revised LDP.

- 3.13 Of the five stakeholders who specifically responded to this question, three agreed with the findings of the review of policy effectiveness, one disagreed and one neither agreed nor disagreed.

Question 11: Do you agree that it is appropriate to revise the LDP following the full revision procedure? If not, please explain how the short form revision procedure can be followed without undermining the Strategy or creating a distinctly different LDP to the one adopted?

- 3.14 Of the five stakeholders who specifically responded to this question, four agreed that it is appropriate to revise the LDP following the full revision procedure, while one disagreed.

APPENDIX A - Invitations Sent to Stakeholders

Name	Organisation/Section
John Payne	Local Agent
Michael Harris	Local Agent
Adrian Reed	Local Agent
Peter Barnes	Peter Barnes & Associates
Chris Meredith	Local Agent
Graham Worthington	Worthington Enterprises
Adrian Drew	Local Agent
Terry Morgan	Local Agent
Liz Hernon	Hernon Associates
Stefan Morgan	Morgan & Horowskyj
Mr Garner	EOS Architects
KJ Lloyd	KJ Lloyd Architect
Roger Field	FTAA Ltd
-	BB Design Services
Philip Tucker	Local Agent
Gwyn Humphreys	Local Agent
Owen Davies	Owen Davies Consulting Ltd
Mr Dallimore	C2J Architects and Town Planners
-	Atkins
-	Boyer Planning
-	Savills
-	Litchfields
-	Peacock & Smith
-	RPS Group
-	Tony Thorpe Associates
-	WYG
-	Land Access & Recreation Association
-	BNP Paribas Real Estate
-	DLP Planning
Martin Dolan	Capita Property
Louis Chicot	Louis Chicot Associates
Alys Thomas	Cushman and Wakefield
Michael Rees	LRM Planning Ltd
Richard Gwinnell	Abertillery & Llanhilleth Community Council
Mrs A Davies	Brynmawr Town Council
Mrs T Hughes	Nantyglo & Blaina Town Council
-	Tredeggar Town Council
-	Blaenavon Town Council
Rhys Evans	Dwr Cymru Welsh Water
Gemma Beynon	Natural Resources Wales
-	Cadw
Alun Davies	AM

Nick Smith	MP
Mark Harris	Home Builders Federation Wales
Catlin Ritchie	Abertillery Retailer Action Group
-	Ebbw Vale Business Forum
Mrs D Wallbank	Blaenau Gwent Business Forum/ Chairman of Brynmawr Business Forum
-	Tredeggar Business Forum
Gerrard Williams	Melin Homes
Richard Hallet	Linc Cymru
Richard Mann	United Welsh
Andrew Cooke	Tai Calon Community Housing
Vic Warren	Campaign for the Protection of Rural Wales (Newport and Valleys)
Jessica Tippins	Gwent Police
Verronika Brannovic	Gwent Wildlife Trust
-	Glamorgan Gwent Archaeological Trust
-	South Wales Fire Service
Diane Kirkland	Local Health Board
Huw Lewis	GAVO
Steve Smith	Blaenau Gwent County Borough Council
Eirlys Hallet	Blaenau Gwent County Borough Council
Alun Evans	Blaenau Gwent County Borough Council
Carl Powell	Blaenau Gwent County Borough Council
Jim Allen	Blaenau Gwent County Borough Council
Francis Williams	Blaenau Gwent County Borough Council
Bethan McPherson	Blaenau Gwent County Borough Council
Nicola Somerville	Blaenau Gwent County Borough Council
Leanne Connor	Blaenau Gwent County Borough Council
Andrew Parker	Blaenau Gwent County Borough Council
Helena Hunt	Blaenau Gwent County Borough Council
Chris Engel	Blaenau Gwent County Borough Council
Bernadette Elias	Blaenau Gwent County Borough Council
Dave Watkins	Blaenau Gwent County Borough Council
Clare Gardner	Blaenau Gwent County Borough Council
Lisa Jones	Blaenau Gwent County Borough Council
Mark Congreave	Blaenau Gwent County Borough Council
Frank Olding	Blaenau Gwent County Borough Council
Michelle Church	Blaenau Gwent County Borough Council
Louise Horner	Blaenau Gwent County Borough Council

APPENDIX B – Workshop Attendees

Name	Organisation/Section
Veronika Brannovic	Gwent Wildlife Trust
Tracy Hughes	Nantyglo and Blaina Town Council
Terry Morgan	Local Agent
Owen Davies	Owen Davies Consulting
Francesca Sanders	LRM Planning Limited
Rhys Evans	Dwr Cymru/Welsh Water
Ryan Norman	Dwr Cymru/Welsh Water
Dave Sharman	Tai Calon
Andrew Cooke	Tai Calon
Mark Harris	Home Builders Federation
Helen Griffiths	Natural Resources Wales
Louise Horner	Blaenau Gwent County Borough Council/Estates
Lee Williams	Blaenau Gwent County Borough Council/Estates
Lynda Healy	Blaenau Gwent County Borough Council/Development Plans
Hayley Spender	Blaenau Gwent County Borough Council/Development Plans
Tania Jones	Blaenau Gwent County Borough Council/Development Plans
Justin Waite	Blaenau Gwent County Borough Council/Development Plans

APPENDIX C – Workshop Groups

Group 1

Name	Organisation
Louise Horner	Blaenau Gwent County Borough Council – Estates
Mark Harris	Home Builders Federation
Dave Sharman	Tai Calon
Rhys Evans	Dwr Cymru/Welsh Water
Terry Morgan	Local Agent
Helen Griffiths	Natural Resources Wales
Francesca Sanders	LRM Planning Ltd
Lynda Healy	Blaenau Gwent County Borough Council – Development Plans
Hayley Spender	Blaenau Gwent County Borough Council – Development Plans

Group 2

Name	Organisation
Lee Williams	Blaenau Gwent County Borough Council – Estates
Owen Davies	Owen Davies Consulting
Andrew Cooke	Tai Calon
Ryan Norman	Dwr Cymru / Welsh Water
Verronika Brannovic	Gwent Wildlife Trust
Tracy Hughes	Nantyglo and Blaina Town Council
Tania Jones	Blaenau Gwent County Borough Council – Development Plans
Justin Waite	Blaenau Gwent County Borough Council – Development Plans

APPENDIX D – Workshop Agenda

9.45 – 10.00	Registration with Refreshment
10.00 – 10.30	Welcome and Overview of the LDP Review Process and Discussion Paper
10.30 – 11.45	Workshop Session
11.45 – 12.00	Summing-up and Next Steps

APPENDIX E – Presentation




Full Review of the Local Development Plan

Stakeholder Workshop



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What does it involve?

- The review should be informed by the findings of previous **AMRs**, evidence gathered through updated **survey evidence** and pertinent **contextual changes**.
- More specifically, consideration should be given to whether the LDP strategy is not working or out of date.
- The implementation and effectiveness of policies, allocations and designations (including viability and deliverability).


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Why undertake a Full Review?

- Blaenau Gwent LDP up to 2021 was adopted 22nd November 2012
- Section 69 Planning & Compulsory Purchase Act 2004/ Provision 41 LDP Wales Regulations 2005
- Full review every four years from the date of its initial adoption – November 2016


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What does it involve?

- An assessment of the extent to which there has been significant change in:
 - External context e.g economic conditions/neighbouring plans;
 - Legislation and national policy;
 - The local context e.g. major employment site closures/major development proposals/major public sector investment strategies; and
 - Forecasts and assumptions.


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What is a Full Review?

- Comprehensive assessment of whether the LDP remains up-to-date or if changes are needed.

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What does it involve?

- Other important considerations include:
 - The end date of the extant LDP;
 - The need to maintain a 5 year supply of housing land; and
 - The cumulative effect of a range of changes.

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Review Report

- Prepare a review report which must set out what has been considered, which key stakeholders have been engaged and what needs to change and why.
- Must also conclude on the revision procedure to be followed:
 - Short form revision
 - Full form revision

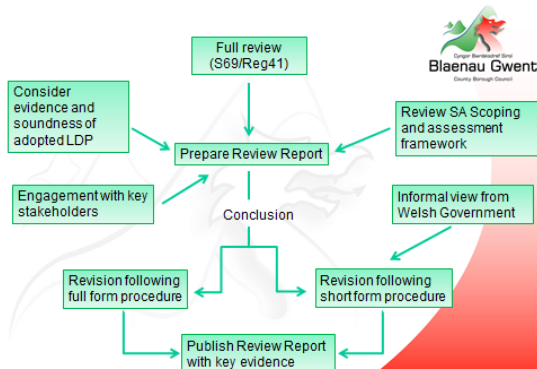
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Discussion Paper

Key findings and suggested changes

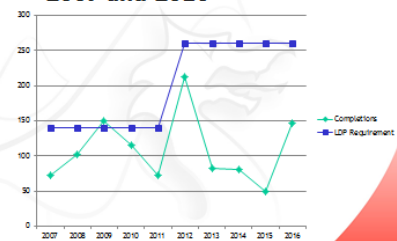
- Delivery of the LDP strategy is behind target.
 - Only 45% of LDP allocations have planning permission despite being two thirds of the way through the plan period.
 - Annual housing completions below target.
 - Only 1,084 new dwellings built (target 1,900).
 - Employment and retail 2016 targets missed.

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Housing Completions between 2007 and 2016



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Questions?

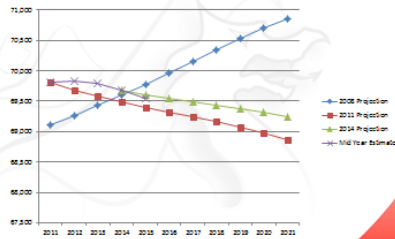
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Key findings and suggested changes

- Welsh Government Population and Household Projections.
 - LDP based on the 2008 projections.
 - WG published 2011 and 2014 based projections indicating a decline in population and a lower level of household growth.

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Comparison of Welsh Government Population Projections



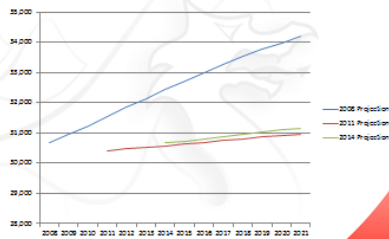
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Town Centre Vacancy Rates between 2009 and 2016



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Comparison of Welsh Government Household Projections



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Key findings and suggested changes

- Brownfield development target missed in 2016, housing density figures proving difficult to achieve and land reclamation schemes have not come forward.
- Employment activity related indicators showing mixed results:
 - 2016 target (66.05%) for increasing employment rate exceeded.
 - 2016 target (23.95%) for reducing percentage of economically inactive wanting a job likely to be missed.
 - Limited progress on diversifying the local economy.

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Key findings and suggested changes

- Spatial distribution of development coming forward is broadly in line with LDP strategy.
- Delivery of affordable housing is behind target.
- Limited progress made on reducing town centre vacancy rates.

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Key findings and suggested changes

- Failed to meet Welsh Government municipal waste reused and recycled/composted target.
 - 49% (BG) 58% (WG)

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Key findings and suggested changes

- Preliminary assessment undertaken of the success or failure in the implementation and delivery of LDP policies, allocations and designations.
- Tables 1 -3 provides an overview of whether an LDP policy, allocation or designation is functioning effectively, or whether some form of revision is likely to be required.

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Full or Short Form Revision?

- Preliminary findings indicate that the full revision process should be followed.
 - Inability to deliver the level of growth required by the LDP's strategy.
 - Inability to maintain a 5 year land supply.
 - A change in the level of growth could result in a significant change to the LDP's strategy.
 - Evidence base updates to reflect an extended plan period (up to 2036) could result in a distinctly different plan.

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Evidence Updates and Significant Contextual Changes

- Welsh Government Population and Household Projections.
- National Policy Requirements (PPW/TANS/Guidance)
 - Economic Development
 - Renewable and Low Carbon Energy
 - Welsh Language
 - Waste

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Questions?

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Evidence Updates and Significant Contextual Changes

- Legislative changes
- Economic changes and viability
- Cardiff Capital City Deal
- Enterprise Zones
- Circuit for Wales

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ANNEX F – Comments Received on Discussion Paper Consultation with Council Response

Discussion Paper Question	Agree/Neither Agree Nor Disagree/Disagree	Comments	Council Response
Dwr Cymru/Welsh Water			
Question 1 – Level of Growth	-	-	-
Question 2 – Spatial Distribution	-	-	-
Question 3 – Affordable Housing	-	-	-
Question 4 – Town Centres	-	-	-
Question 5 – Undelivered Allocations/Brownfield Land and Housing Density Targets	Agree	We believe that a reassessment of all the undelivered LDP allocations is essential. Given that the LDP was adopted in 2012, the previous assessments are now outdated. From Welsh Water's perspective, given that our systems are constantly changing some of our comments will inevitably require updating. From the Council's perspective, this will enable you to assess the viability and deliverability of the allocations afresh.	The comments are noted and the Council will continue to engage with Welsh Water to ensure that water and sewerage infrastructure requirements are included in a comprehensive assessment of the delivery and viability of development allocations as part of the preparation of a revised LDP.
Question 6 – Main Areas of Where LDP is not Working	-	-	-
Question 7 – Housing Requirement	-	-	-
Question 8 – Planning Policy/Evidence Base	-	-	-
Question 9 – Contextual Changes	-	-	-

Question 10 – Policy Effectiveness	Disagree	<p>There is currently no specific Sustainable Drainage Systems (SuDS) policy and as such, we recommend that a policy and supporting text are included in the LDP to ensure that SuDS are implemented onto all new development proposals where appropriate.</p> <p>We would also recommend that the following policies are amended to ensure that our assets are appropriately protected.</p> <p><i>SP10 Protection and Enhancement of the Natural Environment</i></p> <p><i>h) Ensuring that the public sewerage network has the capacity to accommodate the foul only flows from new development without causing flooding,</i></p> <p><i>i) Ensuring surface water is dealt with by means of Sustainable Drainage Systems (SUDS) where appropriate, in order to reduce surface water run-off and minimise flood risk, in line with “New Policy”.</i></p> <p><i>Policy DM1 New Development</i></p> <p><i>1. Sustainable Design</i></p> <p><i>g) The proposal does not result in the public sewerage network becoming overloaded.</i></p> <p><i>h) The proposal can be served by a supply of potable water without causing detriment to existing customers’ supply.</i></p>	<p>The Council acknowledge that there is no standalone SuDS policy within the LDP, although criteria e of policy DM1 does require proposals to reduce surface water runoff through the use of SuDS. Concerns over the effectiveness of this policy have, however, also been raised as part of engagement with internal consultees and some form of revision is anticipated as part of the preparation of a revised LDP.</p> <p>Whilst the Council does not necessarily agree with the policy changes suggested, particularly in respect of policy SP10, further consideration will be given to how the LDP addresses matters relating to the sewerage and potable water network as part of the preparation of a revised LDP.</p>
Q11 – Revision Procedure	-	-	-

Further Comments	-	<p>The majority of the Blaenau Gwent is served by our Cardiff Bay Wastewater Treatment Works (WwTW) aside from the settlement of Brynmawr which has its own WwTW. Our Cardiff Bay WwTW is the largest in Wales and as such, there will be no problems in it accommodating the foul-only flows from the LDP growth. Dependant on the scale of growth in Brynmawr, we will assess the ability to accept foul-only flows when the level of growth is determined.</p> <p>Whilst there are isolated incidents of flooding on parts of the sewerage network throughout the Council area, there are no major issues. Similarly with water supply, there are no major issues. However, both sewerage and water supply are dependent on the location and scale of new development and hydraulic modelling may be required to determine if the growth proposed can be accommodated</p>	The comments are noted and the Council will continue to engage with Welsh Water to ensure that the implications of future growth and development on the sewerage and water supply network are fully considered as part of the preparation of a revised LDP.
Natural Resources Wales			
Question 1 – Level of Growth	-	-	-
Question 2 – Spatial Distribution	-	-	-
Question 3 – Affordable Housing	-	-	-
Question 4 – Town Centres	-	-	-
Question 5 – Undelivered	-	-	-

Allocations/Brownfield Land and Housing Density Targets			
Question 6 – Main Areas of Where LDP is not Working	-	-	-
Question 7 – Housing Requirement	-	-	-
Question 8 – Planning Policy/Evidence Base	-	-	-
Question 9 – Contextual Changes	-	-	-
Question 10 – Policy Effectiveness	-	-	-
Q11 – Revision Procedure	Agree	Based upon the contents of the Paper, the conclusion that a full revision is required appears logical and reasonable, and we support this conclusion.	The support for undertaking a full revision of the LDP is noted.
Further Comments	-	We have not had sight of the topic based background papers and we understand that these consider in more detail changes in national policy, other key contextual changes and the success or failure in the implementation and delivery of various elements of the LDP. We understand that these are not yet published. It is therefore difficult to comment further at this time.	The topic based background papers will be published on the Council's website along with the Review Report and stakeholders are welcome to make further representations to the Council, if necessary. Moreover, the Council will continue to engage with Natural Resources Wales throughout all key stages of the preparation of a revised LDP to ensure that the natural resources and future well-being of Blaenau Gwent continue to be preserved and enhanced.

Newbridge Construction Limited			
Question 1 – Level of Growth	Disagree	<p>We believe that it is fundamentally important to set an aspirational level of growth particularly given the challenging economic and social circumstance. Indeed, it is our view that the role of the plan must be to help stimulate growth and investment and in this regard positive interventions must be considered an essential part of the strategy. In this regard, we believe that the LDP must reflect these aspirations for growth such that opportunities that arise are taken advantage of and that the public sector works with the private sector to stimulate growth. It is therefore important that the LDP provides confidence over the approach that the Council and WG will take towards investment and stimulating growth.</p> <p>As with our clients land holding (Land at Bryn Serth), this has been a long term, large scale site that has been subject to investment and there is a lead in time associated. Our clients are now working with the Council to prepare a Development Brief for the site that will enable a more flexible approach for future occupiers. Indeed, there are numerous potential interests recorded and it is considered important to unlock sites to make them available to occupiers at short notice. Alongside this exercise they are developing detailed infrastructure proposals</p>	<p>The Council agrees that an essential role of the LDP is to stimulate growth and investment through, amongst other things, setting an aspirational level of growth. It is, however, also recognised that it is important to get the balance right between aspiration and what is likely to be achieved over a given plan period. If a plan is ‘too aspirational’, negative consequences can occur, such as a failure to achieve a 5 year housing land supply. The latter is a material consideration that should be afforded considerable weight in the determination of housing related planning applications, which can undermine the plan-led planning system; it also increases pressure on local planning authorities to undertake early reviews of their LDPs.</p> <p>Notwithstanding the above, the Council will continue to be positive in its aspirations for growth and will work closely with private and public sector partners to attract investment and stimulate growth and development within the County Borough. Moreover, it is also acknowledged that a certain amount of overprovision of employment land can be appropriate provided that it is not wholly out of sync with the level of population/housing growth and the needs of the employment market at a local and regional level, and that there is no significant demand for alternative land uses.</p>

		<p>for the delivery of the serviced land opportunities.</p> <p>In this regard the strategy and proposals set by the existing LDP have provided confidence to invest in the site and this is an on-going process.</p>	<p>The positive progress and on-going work in bringing the Bryn Serth employment site forward for development is both noted and welcomed. It is also acknowledged that large scale employment sites of this nature can have long lead in times in bringing development forward, which can extend beyond a given plan period.</p>
Question 2 – Spatial Distribution	Agree	<p>We agree that the majority of growth should be concentrated in the North. As the duelling of the A465 continues and nears completion we believe that the northern part of the Authority will become a more attractive location for investment (as access significantly improves).</p> <p>The current plan has a clear development framework which has enabled investment in pre-development work. Indeed, there are long standing allocations in the North where significant work has been undertaken and continues to be undertaken. In this regard, our clients are in the process of preparing a Development Brief for Bryn Serth that it is hoped will facilitate and capitalise on investment opportunities.</p> <p>The existing framework provides a wholly appropriate means of guiding the recently announced investment by the WG in the automotive sector.</p>	<p>The support for the continued spatial distribution of growth between the Northern Strategy Area and Southern Strategy Area is noted.</p>
Question 3 – Affordable Housing	Agree	<p>We agree that the level sought should be reviewed. As before, the Plan should actively seek to facilitate and stimulate growth and if</p>	<p>The support to review the affordable housing target and the comments relating to the Waun y Pound site are noted.</p>

		<p>a AH contribution is not viable then none should be sought.</p> <p>In this regard our client's proposals at Waun y Pound demonstrate that innovative solutions are achievable and this is based on an appropriate and flexible land supply. In this regard, our client's site will deliver a higher level affordable housing than was achieved in the previous monitoring year.</p> <p>We are of the view that this demonstrates the need to maintain high aspirations for investment and for close and innovative ways of working between the public and private sectors.</p>	
Question 4 – Town Centres	-	-	-
Question 5 – Undelivered Allocations/Brownfield Land and Housing Density Targets	Agree	<p>We agree that this is a sensible approach. However, we do not believe that de-allocation of housing sites is appropriate rather a larger pool of land could be identified to ensure that growth is capitalised on and alternative measures could be taken to encourage more flexibility in delivery of sites.</p>	<p>The support to review undelivered allocations and brownfield land and housing density targets is noted, along with the suggestion that alternative options are considered to the deallocation of sites. However, in respect of the latter, the Council is mindful of the Welsh Government's more stringent requirements on the level of evidence now required to demonstrate that development allocations are deliverable and viable. All undelivered allocations will therefore need to be re-assessed in terms of deliverability and viability over an extended plan period to ensure that their continued inclusion in LDP does not undermine the soundness of the Plan by a failure to meet the third test of soundness: Will the plan deliver?</p>

Question 6 – Main Areas of Where LDP is not Working	Neither Agree nor Disagree	<p>We agree that areas have been identified that are not presently working; however, we note that there are much wider social and economic matters that are impacting upon it rather than an inappropriate strategy. We believe that the approach undertaken should seek to stimulate and promote growth, creating maximum flexibility to accommodate future development. If a trend based approach (which includes the economic down turn) is followed then we believe this will be damaging to the long term prospects of the authority.</p> <p>We would query whether sufficient public sector investment has been made available in the area.</p> <p>It is important to note that recent announcements by the WG (on investment in the automotive sector) indicate that public investment (c£100m) will assist in the delivery of the growth and regeneration aspirations of the plan.</p>	<p>The agreement that the main areas of where the LDP is not working have been identified is noted, along with the concerns over following a trend based approach to identifying levels of development growth. As indicated above, the Council agrees that aspirations for growth are important, although this should be balanced against what can realistically be achieved over a given plan period.</p> <p>The query over whether sufficient public sector investment has been made available and the potential positive influence of the recently announced Welsh Government investment on the delivery of the LDP's strategy is also noted.</p>
Question 7 – Housing Requirement	Disagree	<p>We are fundamentally concerned that should the Authority depart from the "Growth and Regeneration" strategy it will be a retrograde step that will limit the LA's ability to attract growth. Indeed, the subsequent and lower household projections would be based on one of the worst global economic downturns that the Country's economy has been faced with and as such</p>	<p>Whilst the Council shares the concern of purely following a trend based approach to identifying appropriate levels of growth, it must be recognised that the latest Welsh Government Household Projections are, amongst other things, an essential element of the plan's evidence base and any deviation from them needs to be supported by modelling, based on robust evidence (Planning Policy Wales (Edition 9, 2016,</p>

		<p>lowering the targets would only compound the problems faced in Blaenau Gwent.</p> <p>We believe that the LDP should be positive and embrace its growth and regeneration strategy, indeed, the completion of the A465 duelling over coming years and recently announced investment by the WG (into the automotive industry) could be capitalised on to facilitate growth. Indeed, if a low growth strategy is considered then in our view it will be a very negative step. Rather we consider that the LPA should promote positive interventions and ensure maximum opportunities for development and investment.</p> <p>It is important that growth is focussed on main settlements (including Ebbw Vale) and it is appropriate that aspirational levels of employment and housing are planned for.</p>	<p>paragraph 9.2.2)). Moreover, the level of housing provision must be considered in the context of viability and deliverability (ibid), and annual monitoring of housing delivery within the County Borough indicates that the Strategy's housing requirement of 233 dwellings per annum has not been met for a single year during the plan period, including the period of economic growth. In fact, the last year in which 233 or more dwellings were built within the County Borough was 1995. As such, the Council considers it appropriate to reconsider the balance between aspirations for growth and the amount of development likely to be delivered over a given plan period.</p> <p>The need to focus growth on the main towns (including Ebbw Vale) within the County Borough is noted.</p>
Question 8 – Planning Policy/Evidence Base	Disagree	<p>We consider that should the authority adopt lower growth requirements the implications of this should be fully considered in terms of the move from the regeneration strategy.</p> <p>We also note the contextual changes that we have noted, including the announcements on public investment</p>	The comments are noted.
Question 9 – Contextual Changes	Disagree	Consideration does not appear to have been given to the A465 duelling and the impact that it might have. This will provide a high degree of accessibility to wider economies	The suggested contextual changes are noted and consideration will be given to their implications for the review of the LDP.

		<p>that the LPA has not previously been able to benefit from.</p> <p>Also, the lack of funding for the Circuit of Wales is also a consideration that needs to be updated. We are very concerned that without a positive and flexible approach to growth and investment then the Authority's social and economic problems will be exacerbated.</p> <p>The WG announcement on public sector investment in the area should also provide confidence over the delivery of the LDP strategy.</p>	
Question 10 – Policy Effectiveness	Neither Agree Nor Disagree	<p>Whilst the review is awaited, we believe that it should be undertaken on a positive basis – a continuation of the growth and regeneration approach and ensuring maximum flexibility for public and private sector investment. Should a positive approach to intervention not be adopted, and lower aspirations are incorporated then we believe the social and economic consequences for the County could be very negative.</p>	The comments are noted.
Q11 – Revision Procedure	Disagree	<p>We consider that a short term review presents an initial opportunity to consider what adjustments can be made to policies to make them more flexible to encourage growth underpinned by investment from the public and private sector to aid the development of sites like Bryn Serth.</p>	<p>Welsh Government guidance indicates that the short form revision procedure should only be followed where, amongst other things, the LDP's strategy is working and a 5 year land supply can be maintained. The findings of annual monitoring reports clearly demonstrates that the high levels of growth required by the LDP's strategy are not</p>

		<p>We are concerned that rather than abandoning the approach, consideration should be given to what stimulation can be provided, what interventions made and how the plan can become more flexible to actively encourage growth. Indeed, the completion of the duelling of the A465 and the recently announced WG investment will be significant benefits that the Authority should capitalise on (and can help achieve the strategy) rather than the retrograde step to a trends based approach that merely continues existing problems and low growth.</p>	<p>being achieved and the most recent joint housing land availability study indicates that the housing land supply in 2016 was just 1.35 years. If the short form revision procedure was followed, despite the evidence suggesting otherwise, the Council runs the risk of an Inspector disagreeing with the chosen procedure at Examination, resulting in abortive work and the potential waste of time and resources.</p> <p>As indicated above, the Council shares the concern over following trends based approach to growth. It should also be noted that revising the LDP under the full revision procedure will not necessarily result in trends based growth option being followed. The full revision procedure will allow for a range of strategic growth options to be considered, which should enable a more realistic balance to struck between aspiration and what is likely to be delivered over a given plan period. The flexibility within policies and the contribution of public sector intervention will also be considered as part of this process.</p>
Further Comments	-	-	-
Questage Limited			
Question 1 – Level of Growth	Agree	<p>A key component of the LDP Review will be to comprehensively review development needs and the associated development strategy on the basis of an updated evidence base. This is especially important on account of the record of under-delivery against the</p>	<p>The support to reconsider the LDP's level growth is noted, along with the need to have an evidenced based level of growth which is both flexible and deliverable.</p>

		<p>current Development Plan strategy.</p> <p>However, the priority should be ensuring that the evidenced target level of growth is capable of being met through the identification of a sufficient range and quantity of viable and deliverable development sites. This should include a reasonable buffer to account for recent under-delivery and to provide added flexibility going forward. It should be based on clear market signals including investor/developer/landowner interest.</p>	
Question 2 – Spatial Distribution	Neither Agree Nor Disagree	<p>The overall spatial strategy should focus on the established settlement hierarchy comprising Ebbw Vale as the principal hub and three supporting hubs. Development should be distributed on the basis of this hierarchy. As part of this strategy, it will be important to take full advantage of viable and deliverable opportunities to regenerate and grow Abertillery given its role as the main service centre serving the Southern Strategy Area.</p>	<p>The general support for the LDP's existing spatial strategy is noted.</p>
Question 3 – Affordable Housing	Agree	<p>As set out in PPW (para 9.1.4), LDPs must ensure that policies are based on an up-to-date assessment of the full range of housing requirements across the plan area over the plan period.</p> <p>The approach to affordable housing requirements should be firmly based on viability with sufficient flexibility to ensure</p>	<p>The support to reconsider the affordable housing target based on a re-assessment of the delivery and viability of housing allocations is noted, along with the need to avoid unrealistic and undeliverable requirements.</p>

		that much needed open market housing is not delayed through the imposition of unrealistic and undeliverable requirements.	
Question 4 – Town Centres	Neither Agree Nor Disagree	-	-
Question 5 – Undelivered Allocations/Brownfield Land and Housing Density Targets	Agree	<p>A re-assessment of undelivered allocations is a necessary component of revising the overall development strategy and ensuring that development needs are met.</p> <p>The current LDP strategy of prioritising the development of previously developed land, in line with national policy, is appropriate but it is evident that this approach is a contributing factor in the under-delivery being experienced over the current Plan period.</p> <p>Whilst there is the opportunity to address some of these deliverability/viability issues through changes to general/site-specific policies (e.g. a more flexible approach to affordable housing), it is equally important that new sites are identified through the LDP Review to ensure there is sufficient supply and flexibility. This will include the identification of additional greenfield sites to ensure there is a range of deliverable and viable sites and no over-dependence on brownfield sites.</p> <p>As well as re-assessing existing allocations, new sites should be identified through</p>	<p>The support to review undelivered allocations and brownfield land and housing density targets is noted, and the Council acknowledges that there is the potential need for additional development sites as the plan period is rolled forward to 2036. A call for new candidate sites will therefore form part of the LDP revision process and any candidate sites previously considered as part of the preparation of the adopted LDP will need to be resubmitted to the local planning authority for reassessment.</p>

		undertaking a review of those previously submitted and discounted through the LDP process, along with a new 'call for sites'.	
Question 6 – Main Areas of Where LDP is not Working	Neither Agree Nor Disagree	-	-
Question 7 – Housing Requirement	Agree	<p>It is agreed that a review of the LDP's housing requirement should be undertaken in light of the updated population and household projections.</p> <p>As set out in PPW (para 9.2.2), LPAs should have a clear understanding of the factors influencing housing requirements in their area over the plan period. The Plan's evidence base should be informed by the latest Welsh Government local authority level Household Projections for Wales and Local Housing Market Assessment, alongside other key issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the plan.</p> <p>Notwithstanding the above, as also set out in PPW, the Council should assess whether various elements of the projections are appropriate for their area and ensure that the proposed level of housing provision over the plan period is considered in the context of viability and deliverability.</p>	The support to reconsider the LDP's housing requirement in light of the updated population and household projections is noted, along with the highlighted requirements of national policy.
Question 8 – Planning	Neither Agree Nor	-	-

Policy/Evidence Base	Disagree		
Question 9 – Contextual Changes	Neither Agree Nor Disagree	-	-
Question 10 – Policy Effectiveness	Agree	<p>Overall, the findings of the review of policy effectiveness are supported.</p> <p>As previously set out, particular support is given to the proposed review of the LDP’s overall growth target – focusing on a re-assessment of the housing requirement (SP4) and undelivered allocated housing sites (H1 & H2). The identification of a suitable range and quantity of new sites is also strongly supported as this will be a necessary requirement in ensuring that the growth strategy is viable and deliverable. This will entail an associated review of existing settlement boundaries (SB1), particularly for the Principal and Service Hubs.</p>	The support for the findings of the review of policy effectiveness is noted, along with the specific comments relating to housing and settlement boundary policies.
Q11 – Revision Procedure	Agree	A full review of the LDP should be undertaken, given that a comprehensive review of development requirements is required and given the basic need to ensure that the growth strategy going forward is realistic and achievable.	The support for undertaking a full revision of the LDP is noted.
Further Comments	-	-	-

Campaign for the Protection of Rural Wales (Newport & Valleys Branch)			
Question 1 – Level of Growth	Agree	<p>Easy one – WG forecasts have changed so basis of current LDP is wrong. Must be changed.</p> <p>The brevity of the consultation is commendable, although, having missed the Workshop through illness, I am unsure of what the revised ground rules are or will be, in terms of new targets /requirements for housing supply / affordable housing etc, and whether additional ‘growth’ is proposed over and above what is necessary for Blaenau Gwent people and communities.</p>	The apparent support for the reconsideration of the LDP’s level of growth is noted.
Question 2 – Spatial Distribution	Agree	The original policy appears to be still applicable.	The support for the continued spatial distribution of growth between the Northern Strategy Area and Southern Strategy Area is noted.
Question 3 – Affordable Housing	Agree	It should no doubt be reviewed, but it is unclear whether by ‘delivery and viability’ you mean making it easier or more difficult for developers to avoid their % obligations, and/or whether this would result in allowing more expensive housing that would end up attracting incomers, adding to commuting and congestion and other costs to the local authority. The needs of Blaenau Gwent people should be paramount.	The support to reconsider the affordable housing target is noted. The re-assessment will be based on the housing need identified in the most up-to-date local housing market assessment and take into account the anticipated levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can realistically be sought. The latter will need to balance the demand for affordable housing against site viability.
Question 4 – Town Centres	-	-	-
Question 5 – Undelivered Allocations/Brownfield Land and Housing Density Targets	Agree	Probably a reassessment, presumably the timetable for delivery of housing will extend. Brown field land should continue to be the priority, CPRW is strongly against use of	The support to review undelivered allocations and brownfield land and housing density targets is noted, and the Council acknowledges CPRW’s expectation that the development of brownfield

		greenfield land except in exceptional circumstances.	land continues to be prioritised. The plan period is likely to be rolled forward to cover a period of up to 2036.
Question 6 – Main Areas of Where LDP is not Working	-	-	-
Question 7 – Housing Requirement	Agree	Undoubtedly. Reduce / extend housing targets. LDP must include provision for Blaenau Gwent residents and particularly youngsters.	The support to reconsider the LDP's housing requirement is noted.
Question 8 – Planning Policy/Evidence Base	Agree	As far as I can see at this stage. Not sure what the reference to SB1 means, we hope it does not indicate extending into countryside.	The agreement that the main changes to planning policy and the evidence base have been identified is noted. At this stage, the recommendation to revise Policy SB1 Settlement Boundaries relates to the need for greater clarification on types of development that are appropriate outside settlements. However, changes to the settlement boundary may be considered necessary as part of the preparation of a revised LDP.
Question 9 – Contextual Changes	Agree	As far as I can see at this stage.	The agreement that the main contextual have been identified is noted.
Question 10 – Policy Effectiveness	Agree	In general, although I am not clear yet what this will lead to in a revised LDP. CPRW asks that countryside and green spaces should be conserved except in exceptional circumstances, within a revised LDP.	The agreement with the findings of the review of LDP policy effectiveness is noted, along with CPRW's request that the need to conserve the countryside and green spaces is given due regard as part of the preparation of a revised LDP.
Q11 – Revision Procedure	Agree	Full revision appears unavoidable.	The support for undertaking a full revision of the LDP is noted.
Further Comments	-	<ol style="list-style-type: none"> 1. The WG planning process which results in over-development, lack of affordable housing for local residents and too much expensive housing for incomers is not fit for purpose. 2. We ask that you do not allocate more 	Comments relating to the failings of the planning system as a whole and the need to restart publicly funded land reclamation projects and give greater emphasis on the regeneration of the Valleys rather than just focussing on Cardiff are noted; however, these matters are ultimately under the

		<p>greenfield land because brownfield sites are too expensive to develop. Pressure should be applied to Welsh Government to re-start publicly-funded land reclamation projects if this is necessary.</p> <p>3. Welsh Government should be more generally pushed to actually achieve regeneration of the Valleys – starting with a South Wales & Valleys metro, not just for Cardiff.</p> <p>4. Circuit Of Wales appears to have gone – another WG debacle, no doubt this needs to be factored in.</p>	<p>control of the Welsh Government.</p> <p>The Welsh Government’s recent decision to not provide financial support to the Circuit of Wales development and the uncertainty that it brings to the future delivery of the development is also noted.</p>
Blaenau Gwent CBC – Housing Development Officer on behalf of Regeneration Department			
Question 1 – Level of Growth	Agree	<p>The Circuit of Wales decision, whilst a blow, draws a line under that issue.</p> <p>Detail is required on the proposed replacement Business park, and, Blaenau Gwent should proactively pursue this whilst Welsh Government has it as a priority.</p> <p>Should be linking this to the Blaenau Gwent County Borough Council’s drive to attract new investment through its prospectus.</p> <p>Need for Welsh Government to clarify / firm up any budget commitments for the replacement Business Park, and if they do growth levels could be achievable.</p>	<p>The change in circumstances in respect of the Circuit of Wales and the alternative £100 million Welsh Government investment in an automotive business park in the County Borough are noted.</p> <p>Further details on the latter are however required from the Welsh Government before the potential influence on future levels of growth can be determined.</p>
Question 2 – Spatial Distribution	Agree	<p>Yes, the Northern Corridor is closest to the proposed employment opportunity at CoW</p>	<p>The support for the continued spatial distribution of growth between the Northern Strategy Area</p>

		site.	and Southern Strategy Area is noted.
Question 3 – Affordable Housing	Agree	Yes I agree that the affordable housing target should be reviewed as part of a wider viability assessment, however, viability issues are far broader than low house prices and the introduction of sprinklers. Recent private sector interest in housing development in the area should be viewed as a positive indication of greater confidence in the market.	The support to reconsider the affordable housing target is noted, along with the recent private sector interest in housing development in the area. A broad re-assessment will be undertaken based on the housing need identified in the most up-to-date local housing market assessment and will take into account the anticipated levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can realistically be sought.
Question 4 – Town Centres	Agree	Yes. Diversification is necessary, although this is not a problem just specific to Blaenau Gwent. Small Town Centres are less viable, shopping patterns / methods as much as the recession the reason. Innovation through use of digital infrastructure could help, but trying to maintain 5 retail centres is difficult.	The support to review the approach to town centres and the general comments relating to the challenges faced by all small town centres is noted.
Question 5 – Undelivered Allocations/Brownfield Land and Housing Density Targets	Agree	-	-
Question 6 – Main Areas of Where LDP is not Working	Agree	-	-
Question 7 – Housing Requirement	Agree	In light of Brexit, there is likely to be a reduction in population in migration, and as most commentators agree that the impact of Brexit will not be economically beneficial, it is unlikely that private housing demand will be met for current projections. Counterbalancing this, will there be funds provided for the regions as a political choice to end Austerity may be imminent?	The support to reconsider the LDP's housing requirement is noted, along with potential external influences, such as Brexit, political choices in terms of austerity and the Cardiff Capital City Deal. The need to base the LDP's housing requirement on robust evidence which is not solely focussed on the Welsh Government's population and

		<p>Cardiff City deal is still some way off delivery it seems, so a revision downwards may be sensible.</p> <p>The LDPs housing requirement needs to consider a robust evidence base such as the latest Housing Market Assessment and not just the Welsh Government household projection figures. Housing requirement for particular groups will also need to be considered, for example, Gypsy and Traveller Accommodation Assessment.</p>	household projections is also acknowledged.
Question 8 – Planning Policy/Evidence Base	Neither Agree Nor Disagree	-	-
Question 9 – Contextual Changes	Agree	CoW refusal has to be assessed.	It is acknowledged that the change in circumstances in respect of the Circuit of Wales and the alternative £100 million Welsh Government investment in an automotive business park in the County Borough require further consideration.
Question 10 – Policy Effectiveness	Agree	-	-
Q11 – Revision Procedure	Agree	-	-
Further Comments	-	Has there been any consideration of working in collaboration with neighbouring local authorities, especially in light of the Cardiff Capitol Region City Deal?	Yes – Discussions have been undertaken with neighbouring authorities in respect of opportunities for joint working and further information will be provided within the Review Report.

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