

Blaenau Gwent County Borough Council
Cyngor Bwrdeistref Sirol Blaenau Gwent



Discussion Paper - Review **Bapur Trafod - Adolygiad**

Local Development Plan Review
Adolygiad y Cynllun Datblygu Lleol

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1.0 INTRODUCTION

- 1.1 The adopted Blaenau Gwent Local Development Plan (LDP) sets out the Council's priorities for the development and use of land in the County Borough and its policies to implement them over a fifteen year period up to 2021. The LDP was adopted on 22nd November 2012 and its delivery and implementation has been monitored on an annual basis with the publication of three Annual Monitoring Reports (AMRs) to date.

Need for a Full Review of the LDP

- 1.2 In addition to annual monitoring, LDPs must undergo a comprehensive review at least every four years in order to ensure that they remain up-to-date. Accordingly, a full review of the adopted LDP commenced on 22nd November 2016 and will culminate with the production of a review report which will need to 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?

- 1.3 The review report must also make a conclusion on the revision procedure to be followed, which can be either a short form revision or a full revision. In order to establish whether a short form or full revision of the LDP is required, consideration needs to be given to a number of factors, including the findings of preceding AMRs, significant contextual changes and up dates 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.

Purpose of this Paper

- 1.4 The purpose of this discussion paper is to obtain the views of key stakeholders on what factors should be considered as part of the full review and what changes are required to the LDP. In addition, views are sought on whether the extent of changes required to the LDP are capable of being undertaken through the short form revision procedure, or whether the changes are significant enough for a full revision of the LDP to be undertaken.

Format of this Paper

- 1.5 The Council has analysed the findings of the preceding AMRs and prepared a range of topic based background papers which 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. Based on the analysis to date, a number of key trends and issues have been identified which are discussed in further detail in relevant sections below. The key trends and issues identified are

not considered definitive, and stakeholders are invited to agree or disagree with their relevance and to suggest any others that have currently been omitted. It should however be noted that the Council will require any comments to be supported by evidence before they can be considered for inclusion within the LDP review.

- 1.6 The remainder of this paper highlights the key findings of the AMR (section 2); considers whether the LDP evidence base remains up-to-date (section 3); identifies significant contextual changes that have occurred since LDP adoption (section 4); and provides an overview of whether the LDP policies, allocations and designations should be retained, revised or removed as part of the LDP revision process (section 5). Finally, an overall view is given on whether the cumulative effect of the range of changes required to the LDP would result in the need to reconsider the LDP's strategy or result in an LDP which is distinctively different from the one adopted (section 6).

2.0 WHAT ARE THE KEY FINDINGS OF THE ANNUAL MONITORING REPORT?

- 2.1 National guidance states that a plan review should, amongst other things, draw on the findings of published Annual Monitoring Reports (AMRs). The most recent AMR was published in October 2016 and covers the period from 1st April 2015 to 31st March 2016.
- 2.2 The AMR assesses the extent to which the LDP's strategic objectives are being met through the delivery of the LDP's strategy, policies and allocations. Each LDP strategic objective falls under one of the four key themes of the LDP, which are used below to consider the key findings of the AMR. The delivery of the LDP's Strategy is, however, initially considered in terms of both the level and spatial distribution of growth.

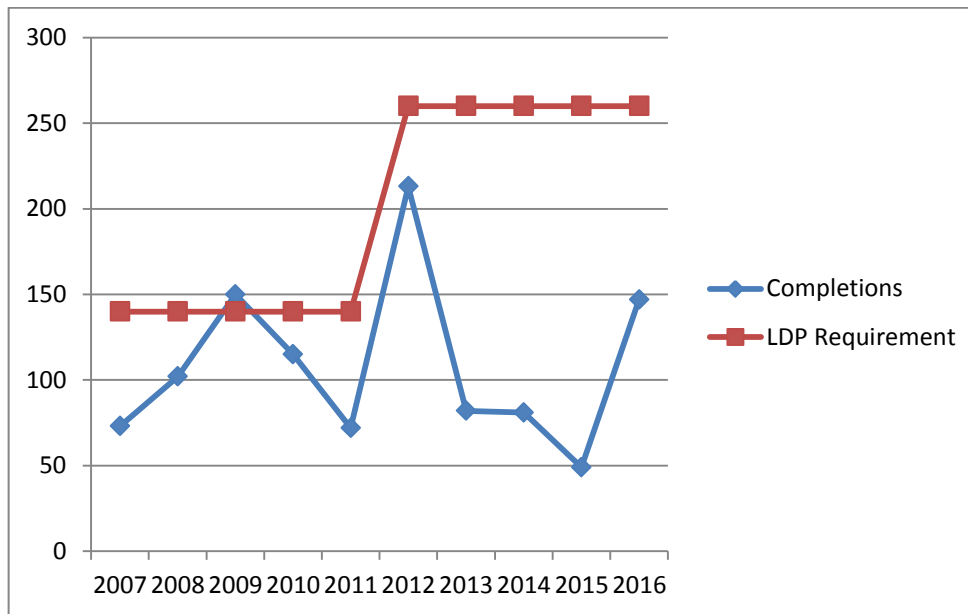
Delivering the LDP's Strategy of 'Growth and Regeneration' – Level of Growth

- 2.3 The LDP is now two thirds of the way through the plan period and it is clear that the delivery of the LDP's Strategy of 'Growth and Regeneration' is behind target, with only 45% of LDP allocations having been granted planning permission despite being two thirds of the way through the plan period.

Housing

- 2.4 Between 2006 and 2016, 1,084 new dwellings were built which is well below the target of 1,900. Annual housing completions have been below the LDP requirement for all but one year since 2007 (see Figure 1) and, as a consequence, nearly 500 dwellings per annum would need to be delivered over the next five years in order to meet the LDP's housing target of 3,500 dwellings by 2021. This level of housing delivery is clearly unachievable and as such, the housing element of the LDP's Strategy will not be delivered by 2021.

Figure 1 – Housing Completions in Blaenau Gwent 2007-2016



- 2.5 The failure to deliver the high levels of housing growth is primarily attributable to the impact of the economic recession on the operations of the housing and commercial markets. It has, however, also become clear that the LDP's housing requirement is too high as it is based on the 2008 household projection which reflects a period of growth, rather than the period of recession actually experienced (see section 3 for further details).
- 2.6 It is also important to note that the slow progress in housing allocations coming forward has resulted in the Council having a housing land supply of just 1.35 years in 2016. As a consequence, the Council is vulnerable to speculative housing development which undermines the plan-led approach to the development and use of land in the County Borough.

Employment

- 2.7 The LDP allocates 50 hectares of land for employment and business purposes in order to meet the County Borough's economic development and employment needs. The REGAIN building, located on 'The Works' site, is the only development to have been delivered on an employment allocation to date. The building provides just 500 sq m of office B1 floorspace and covers a wider site area of 0.18 hectares. While some additional employment land has been delivered elsewhere in the County Borough in the form of extensions and new industrial units at existing employment sites, the amount of employment land delivered falls significantly short of the monitoring target of delivering 23.8 hectares of employment land by 2016. Moreover, the longer term target of delivering 50 hectares of employment land by 2021 is also unlikely to be achieved based on the limited amount of employment

land that has either planning permission or is under construction at allocated and existing employment sites.

Retail

- 2.8 The LDP identifies an overall convenience and comparison retail need of 2,445 sq m and 10,200 sq m respectively. This need was expected to be met through the delivery of a range of retail commitments (sites with planning permission), allocations and redevelopment schemes within existing town centres.
- 2.9 To date, no retail commitments or allocations have been delivered, and the only significant retail development delivered within a town centre has been the 227 sq m extension to the Aldi store in Ebbw Vale. The target of delivering 9,100 sq m of retail floorspace by 2016 has not therefore been met, and it also appears unlikely that the longer term target of delivering 11,500 sq m will be met with only a small number of retail applications granted planning permission.

Summary

- 2.10 The level of housing, employment and retail growth required by the LDP's strategy of 'Growth and Regeneration' is clearly not being achieved. Whilst challenging economic conditions have undoubtedly had a detrimental effect on delivery rates, consideration needs to be given to whether it is appropriate to continue with this high level of growth over an extended plan period.

Q1	Do you agree that the LDP's high level of growth should be reconsidered?
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Delivering the LDP's Strategy of 'Growth and Regeneration' – Spatial Distribution

Housing

- 2.11 The LDP focusses the majority of housing development within the Northern Strategy Area (NSA) (2,853 dwellings), with more limited housing growth in Southern Strategy Area (SSA) (228 dwellings). To date, both areas are behind target on the delivery of housing, although the NSA (58% of dwellings delivered) is faring better than the SSA (49% of dwellings delivered). It therefore appears that whilst the level of housing growth is not being delivered, future housing development should continue to be directed towards the NSA.

Employment

- 2.12 The majority of employment allocations are also located within the NSA (48.5 ha) with just one allocation in SSA (1.5 ha). As indicated above, just one employment allocation has been delivered to date in the NSA, which suggests that the

employment market is weak across the entire County Borough. There is no evidence to suggest that more employment land would be delivered if it were located in the SSA and regard must be had to the targeted support and investment through Enterprise Zones designations within the NSA (See Section 4 below). Accordingly, as with housing development, it is considered that future employment development should continue to be focussed on the NSA.

Retail

- 2.13 All retail proposals are allocated within Ebbw Vale Town Centre and all retail commitments fall within the wider Ebbw Vale area. The LDP's proposals and commitments reflect the LDP's Spatial Strategy of 'Growth and Regeneration', which places Ebbw Vale at the top of the retail hierarchy as the Principal Town Centre.
- 2.14 As indicated above, the prevailing economic conditions are considered to be the primary reason for the failure to deliver the LDP's retail commitments by 2016 and the limited progress on bringing LDP allocations forward. Moreover, the Wales Spatial Plan continues to identify Ebbw Vale as a key settlement that has a critical role to play in the success of the Capital Region and key regeneration initiatives remain focussed on the Town. It is therefore considered that future retail growth should continue to be directed towards Ebbw Vale, particularly the Town Centre.

Summary

- 2.15 It is therefore considered that the spatial distribution of development remains appropriate and the NSA should continue to be the focus for the majority of new housing, employment and retail development over an extended plan period.

Q2	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?
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Theme 1: Create a Network of Sustainable Vibrant Valley Communities

Affordable Housing

- 2.16 In respect of affordable housing, the LDP aims to deliver 1,000 affordable dwellings by 2021, 335 of which will be through Section 106 agreements. To date, only 428 affordable dwellings have been delivered with just 74.5 dwellings either secured or in the process of being secured by Section 106 agreement. The interim target of delivering 224 affordable dwellings through Section 106 agreements by 2016 has therefore been missed and it is unlikely that the 2021 affordable dwelling targets will be met given that the LDP is two thirds of the way through its planning period.

- 2.17 The delivery of affordable dwellings through Section 106 agreements is dependent on the condition of the local housing market and development viability. As such, it is considered necessary to reconsider the appropriateness of the LDP's 10% affordable housing requirement alongside a broader assessment of whether the undelivered housing allocations remain viable and deliverable over an extended plan period.

Q3	Do you agree that the affordable housing target should be reviewed based on a re-assessment of the delivery and viability of housing allocations?
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Thriving Town Centres

- 2.18 A key challenge for the LDP was the need to define new roles for town centres in order to reduce the amount of competition between them and to enable them to adapt to the impact of out of town centres and internet shopping. Accordingly, new roles were identified, a retail hierarchy was established and appropriate town centre uses identified. In doing so, it was anticipated that the high vacancy rates would reduce from the 2009 base figure of 15%.
- 2.19 The level of success in reducing the vacancy rate has varied between town centres over the monitoring period (2009 to 2016), ranging from an overall reduction of 3.2% in Blaina to an increase of 5.6% in Tredegar. The average vacancy rate for Blaenau Gwent's town centres was, however, 0.9% higher in 2016 than in 2009 and 2.2% higher than the Welsh average.
- 2.20 Whilst it is acknowledge that the vacancy rate of the town centres has fluctuated between years over the monitoring period, it is reasonable to conclude that there has been no discernible improvement in the vitality and viability of Blaenau Gwent's town centres. It is therefore recommended that the policy approach to town centres be reconsidered.

Q4	Do you agree that the approach to town centres should be reviewed in order to ensure that they diversify and thrive?
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Efficient Use of Land

- 2.21 The LDP seeks to achieve the most efficient use of land by delivering the majority of development (80%) on brownfield land, achieving average housing densities of 35 units or more per hectare on all mixed use sites and facilitating four land use reclamation schemes that will bring derelict land back into beneficial use.
- 2.22 In 2016, the target for development on brownfield land was missed with a figure of 74% recorded. While it was not possible to calculate housing density figure for mixed

use sites due to no planning permissions granted over the monitoring period, it is worth noting that the average density on permitted allocated sites was 19 units per hectare, which is particularly low. The land reclamation schemes have also not come forward as anticipated, with two schemes missing their delivery target of 2016 and no progress on the other two schemes which are expected to be delivered by 2021. This is primarily due to the economic recession and associated recent contraction in public sector spending which has resulted in no Welsh Government or capital funding being available to deliver the reclamation schemes.

- 2.23 It is therefore considered that all undelivered brownfield development and land reclamation allocations be reassessed in order to ensure that they remain deliverable over an extended plan period. The targets for the percentage of development on brownfield land and housing density should also be reconsidered as part of this process.

Q5	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?
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Theme 2: Create Opportunities for Sustainable Economic Growth and Promote Learning and Skills

- 2.24 The LDP aims to ensure that sufficient employment land is provided to increase employment activity. As indicated above, the amount of new employment land delivered is not meeting the targets set by the LDP. Employment activity related indicators are also showing mixed results. For instance, the target of increasing the employment rate to 66.05% by 2016 has been exceeded, while the target of reducing the percentage of economically inactive wanting a job to 23.95% by 2016 has been missed. Limited progress is also being made on diversifying the local economy since 2008, with a smaller than anticipated increase in the number of service jobs (+100), no change in the number of construction jobs and a decline in the number of manufacturing jobs (-1000).
- 2.25 Economic conditions have undoubtedly had a negative impact on the delivery of employment allocations, which is likely to have been a contributing factor in employment activity and economic diversification targets not being met. The ability of the LDP to directly affect these targets is however limited, with other socio-economic factors also having a significant influence.

Theme 4: Create Opportunities to Secure an Adequate Supply of Minerals and Reduce Waste

- 2.26 The percentage of municipal waste reused and recycled/composted in Blaenau Gwent was 49% in 2015/16, which was well below the national target of 58%. This underperformance occurred despite improvements to the waste collection service, the successful delivery of an expanded waste bulking and transfer facility at Silent Valley, and new sub regional residual waste procurement contracts which result in municipal waste being treated at facilities outside the County Borough.
- 2.27 It is not anticipated that additional waste management facilities need to be delivered locally in order to improve reuse, recycling and composting rates of municipal waste. An exception may be the potential need for a recycling facility in the Ebbw Fach Valley, though the business case for this facility is still under consideration. Instead, interventions are anticipated to focus on increasing public participation through publicity, community engagement and enforcement. When this is considered alongside new waste procurement contracts, it not considered that LDP will have a significant short term role in meeting increasingly challenging waste targets as the Nation progresses towards achieving zero waste.

Q6

Do you agree that the main areas of where the LDP is not working as intended have been identified?

3.0 DOES THE EVIDENCE BASE REMAIN UP TO DATE?

3.1 Since the preparation and adoption of the LDP, there have been a number of changes to the evidence base which indicate that the LDP may need to be revised in order for it to remain appropriate for the area. Changes to national planning policy have also brought in new requirements for the preparation of evidence for certain topic areas. The most significant changes are considered below.

Welsh Government Population and Household Projections

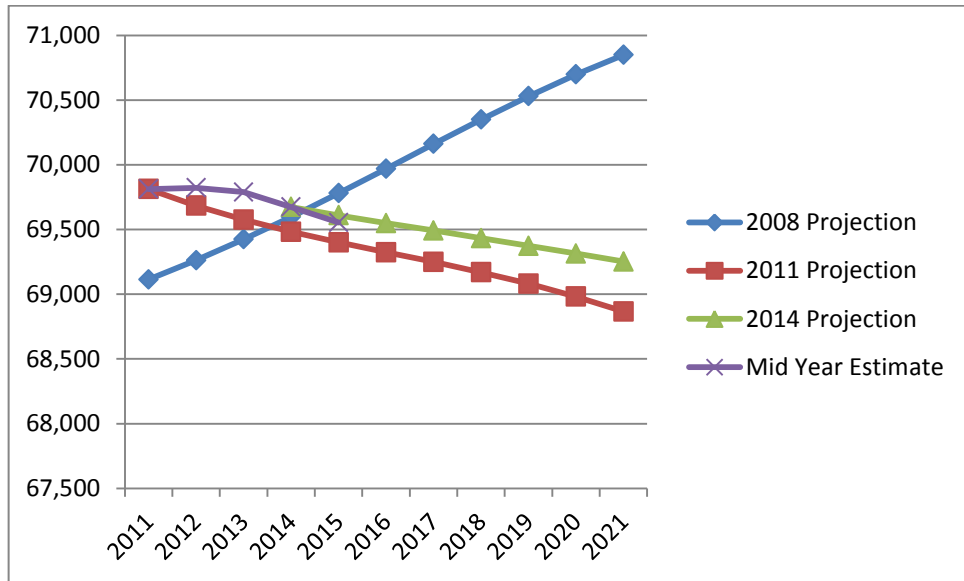
3.2 The LDP is based on the Welsh Government's 2008 population projections which estimated that Blaenau Gwent's population would increase from 68,914 to 70,849 between 2006 and 2021. The corresponding household projections indicated a need for an additional 3,925 households to meet this growth in population.

3.3 Since the LDP was adopted, the Welsh Government has released new population projections based on the 2011 census (published 2013), population projections based on mid-year population estimates for 2014 (published 2016) and mid-year population estimates (published annually). The key changes for Blaenau Gwent are as follows:

- The 2011 based projections suggest that the population will fall from 69,812 in 2011 to 68,867 by 2021.
- The 2014 based projections indicate that population levels will continue to fall from 69,674 to 69,252 between 2014 and 2021.
- The mid-year estimates for the period 2011 to 2015 identify a steady decline from 69,812 to 69,554, which equates to a 0.11% decline per year over the last four years.

3.4 The population loss identified above is in contrast to the 2008 based population projections (see Figure 2 below) on which the LDP's Strategy of 'Growth and Regeneration' is based. The switch from a projection of population increase to population decline is explained by the trend based nature of the projections: the 2008 based projections reflect a period of economic growth, while the 2011 and 2014 based projections reflect a period of economic decline.

Figure 2 – Comparison of Welsh Government’s 2008, 2011 and 2014 based Population Projections and Mid-year Estimates for Blaenau Gwent

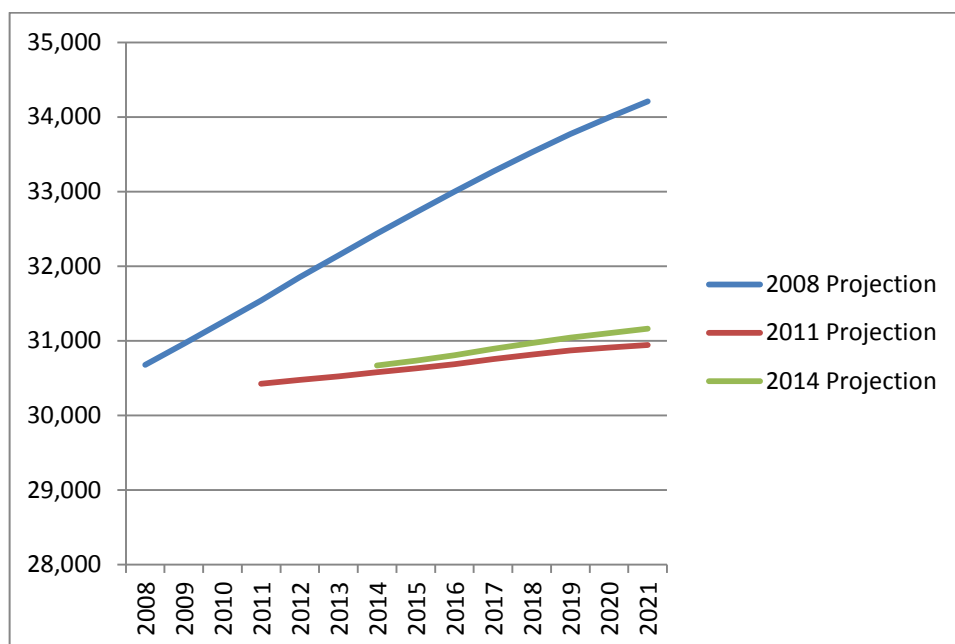


3.5 Corresponding household projections have also been released by the Welsh Government based on 2011 Census data (published 2014) and the 2014 population projections (published 2017). The key changes for Blaenau Gwent are as follows:

- The 2011 based projections estimate that the number of households will increase from 30,426 to 30,943 between 2011 and 2021. This suggests that approximately 52 dwellings will need to be built per year.
- The 2014 based projections estimate that the number of households will increase from 30,670 to 31,160 between 2014 and 2021. This suggests that approximately 70 dwellings will need to be built per year.

3.6 The latest Welsh Government household projections indicate a much lower increase in household numbers than the 2008 based projection which has informed the LDP’s Strategy of ‘Growth and Regeneration’ (See Figure 3 below). The LDP’s current housing requirement of delivering 233 dwellings per annum is significantly higher than the 52 and 70 dwellings per annum required by the 2011 and 2014 based projections respectively. It is therefore considered appropriate to reconsider the housing requirement as part of the preparation of a revised LDP.

Figure 3 – Comparison of Welsh Government’s 2008, 2011 and 2014 based Household Projections for Blaenau Gwent



Q7	Do you agree that the LDP’s housing requirement should be reconsidered in light of the Welsh Government’s updated population and household projections?
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National Policy Requirements

3.7 Over recent years there have been a number of revisions to Planning Policy Wales (PPW), Technical Advice Notes (TANs) and the publication of new or updated Welsh Government practice guidance that can be used to prepare an evidence base for the LDP. Four policy areas that have been directly affected by these changes are: economic development, renewable and low carbon energy, the Welsh language and waste.

Economic Development

3.8 Chapter 7 of PPW has been revised and TAN 23: Economic Development (2014) has been published along with practice guidance on building an economic development evidence base. The latter provides advice and a methodology to assist local planning authorities in undertaking employment land studies at both a local and larger than local level. New requirements that make the existing evidence base out of date include the need to work more closely with neighbouring authorities and other stakeholders to plan strategically for employment land provision, and the need to

identify separate land provision targets for B1 and B2/B8 uses separately (paragraph 7.5.1).

Renewable and Low Carbon Energy

- 3.9 The Welsh Government's best practice guidance on renewable and low carbon energy was refreshed in 2015 in order to update data sources and include consideration of solar farm developments as a stand-alone technology. The revised toolkit also provides new advice on how to translate renewable energy assessments into policies which guide appropriate renewable and low carbon energy development to the most suitable locations.
- 3.10 The renewable energy assessment, which informed the policies within the LDP, was based on the Welsh Government's best practice guidance, and will therefore need to be updated to address the new requirements identified above.

Welsh Language

- 3.11 Chapter 4 of PPW has been updated to reflect the requirements of Sections 11 and 31 of The Planning (Wales) Act 2015, which relate to the consideration of the Welsh language in on-going surveys and the preparation of an LDP, and the determination of a planning application respectively. The Welsh Government also published practice guidance in 2014 to assist Local Planning Authorities (LPAs) with the consideration of Welsh language issues during the preparation, monitoring and review of LDPs.
- 3.12 PPW states that Local Planning Authorities (LPAs) must consider the likely effects of their development plan on the use of the Welsh language in the Sustainability Appraisal of their plans, and should keep under review the extent to which the Welsh language is used in their area (paragraph 4.13.3). Moreover, TAN 20: Planning and the Welsh Language (2013) also indicates that all LDPs should include a short reasoned justification of the regard had to the needs and interests of the Welsh language, and an explanation of how any policies relating to the Welsh language interact with other plan policies (paragraph 3.7.2).

Waste

- 3.13 Chapter 12 of PPW and TAN 21: Waste have been revised to reflect changes to the waste policy context set out in the revised Waste Framework Directive (Directive 2008/98/EC on waste) and Welsh Government policy Towards Zero Waste (TZW) and the Collection, Infrastructure and Markets Sector (CIMS) Plan. These changes have been made to update the way in which the planning process facilitates the delivery of sustainable waste management infrastructure. It also takes into account specific

principles central to sustainable waste management, including the waste hierarchy, self-sufficiency and the concept of the nearest appropriate installation.

- 3.14 PPW indicates that LPAs need to have particular regard to the aspirations and requirements of TZW and the CIMS Plan, information within waste planning monitoring reports and waste management priorities relevant to the local area (paragraph 12.6.1). In addition, LDPs should identify suitable locations for accommodating sustainable waste management facilities (paragraph 12.6.2) and secure opportunities to reduce or recycle waste as part of the design, construction and operation of buildings (paragraph 12.6.3).
- 3.15 Amongst other things, TAN 21: Waste (2014) sets out regional annual monitoring arrangements which culminate with the publication of waste planning monitoring reports (see section 3). The intention of waste monitoring is to enable both Welsh Government and LPAs to take a strategic overview of issues and trend in the waste sector to help inform local development plans and decisions on planning applications. Regional waste plans, which informed the preparation of the adopted LDP, no longer have effect.

Plan Period

- 3.16 It should be noted that the plan period will need to be extended irrespective of whether a revised plan is prepared following the short form or full revision process. A broader update to the evidence base will therefore be required, including updated need assessments (such as retail and gypsy and traveller) and additional land requirements.

Q8	Do you agree that the main changes to planning policy and the evidence base have been identified?
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4.0 HAVE THERE BEEN SIGNIFICANT CONTEXTUAL CHANGES?

4.1 An important consideration in determining whether the LDP remains up-to-date is whether there have been any significant contextual changes. The contextual changes can occur at a national, regional or local level and have the potential to influence the appropriateness and delivery of the LDP's strategy and associated development allocations. The main contextual changes that have occurred since LDP adoption are highlighted below.

Legislative Changes

4.2 In addition to the Planning (Wales) Act 2015, there have been three other significant primary legislative changes in Wales since the adoption of the LDP that affect development plans: the Well-being of Future Generations (Wales) Act 2015, the Environment (Wales) Act 2016 and the Historic Environment (Wales) Act 2016. The Acts have been reviewed and a summary of their implications for the LDP are as follows.

The Well-being of Future Generations Act (Wales) 2015

4.3 The Well-being of Future Generations Act (Wales) 2015 places a duty on public bodies, including local authorities, to carry out sustainable development and to set objectives which maximise its contribution to achieving each of the seven well-being goals. Each public body must take all reasonable steps, in exercising its function, to meet those objectives.

4.4 The Act also establishes Public Service Boards (PSBs) for each local authority area in Wales who must improve economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals. PSBs are responsible for preparing and publishing a Local Well-Being Plan (LWBP) which sets out its objectives and the steps it will take to meet them.

4.5 The well-being goals are broadly embedded within the LDP through the four key themes and it is not considered that the LDP needs significant revision in order to facilitate their achievement. A revised LDP will, however, need to complement the future LWBP and ensure that it expresses, in appropriate land use terms, those elements of the LWBP that relate to the development and use of land.

The Environment Act (Wales) 2016

4.6 The Environment Act (Wales) 2016 seeks to create a new, more integrated approach to managing natural resources in order to achieve long-term sustainability. Amongst other things, the Act strengthens the duty on public bodies to maintain and enhance biodiversity and provides a framework for area based natural resource management and planning. The Welsh Government is required to produce a National Natural

Resources Policy, and Natural Resources Wales must also produce a State of Natural Resources Report and Area Statements, which will inform the preparation of both LWBPs and a revised LDP. The latter may also be indirectly influenced by the provisions within the Act relating to climate change and waste.

The Historic Environment (Wales) Act 2016

- 4.7 The Historic Environment (Wales) Act 2016 provides more effective protection to listed buildings and scheduled monuments, improves the sustainable management of the historic environment and introduces greater transparency and accountability into decisions taken on the historic environment. Whilst the majority of provisions within the Act do not directly affect the preparation of development plans, a statutory register for historic parks and gardens and a statutory historic environment record will help inform the preparation of a revised LDP.

Economic Conditions and Viability

- 4.8 As highlighted in Section 2 above, the failure to deliver the LDP's Strategy of 'Growth and Regeneration' is considered to be primarily the result of the impact of the economic recession on the operation of the housing and commercial markets. While the recession officially ended in 2009, a prolonged period of weak growth was experienced for a number of years with quarter falls in growth experienced in 2012. A sustained period of economic growth has however been experienced post 2012 and the national economy has performed better than expected in aftermath of the referendum result to leave the European Union.
- 4.9 Despite the national economic recovery, Blaenau Gwent has not experienced a positive trend in housing delivery (see Figure 1 above) and viability issues remain. The latter are mainly a result of low house price sales values, a perceived lack of demand by the housing industry and the introduction of the Welsh Government's requirement to install sprinklers in housing. Viability does, however, vary across the housing sub-markets within the County Borough, with the Ebbw Vale housing sub-market assessed as being the most viable, followed by the Brynmawr/Rassau sub market and, finally, Abertillery/Blaina and Tredegar sub markets.
- 4.10 The development of employment premises (office, light industrial, industrial and distribution) also remains challenging due to the generation of insufficient revenues compared to build costs. As a consequence, developments tend to be built specifically for owner occupation with public sector subsidy, rather than on a purely speculative, private sector basis.
- 4.11 In the short term, the local economy is unlikely to experience a significant boost from wider economic improvements given the uncertainty surrounding the future relationship between the UK and the European Union. The economic forecast

provided by the Office of Budget Responsibility in March 2017 indicates that GDP in the UK will be up at 2% in 2017, fall to 1.6% in 2018 and then gradually rise back to 2% by 2020. Less optimistic forecasts provided by PWC indicate that economic growth will be 1.6% and 1.4% for the UK and Wales respectively in 2017; decelerating to 1.4% and 1.2% for the UK and Wales respectively in 2018.

- 4.12 Notwithstanding the lack of significant economic improvements at a UK and Wales level, there is local evidence indicating that the local housing market is slowly improving with increases in sales values noted on local housing developments, such as the Peacehaven site. Interest from national housebuilders is also emerging with a number of planning applications for housing development within the Ebbw Vale area anticipated in the near future. There are also regional and local contextual changes that have the potential to stimulate development; namely the Cardiff Capital City Deal, the designation of Enterprise Zones and the Circuit for Wales Development. These are discussed separately below.

Cardiff Capital City Deal

- 4.13 In March 2016, The UK Government agreed a £1.2 billion City Deal for the Cardiff Capital Region in partnership with the Welsh Government and 10 local authorities of which Blaenau Gwent is one. Over its lifetime, the City Deal is anticipated to deliver up to 25,000 new jobs and leverage an additional £4 billion of private sector investment.
- 4.14 The City Deal will provide local partners with the powers and resources to unlock significant economic growth across the Cardiff Capital Region. It also provides an opportunity to continue tackling the area's barriers to economic growth by: improving transport connectivity; increasing skills; supporting people into work; and giving businesses the support they need to innovate and grow.
- 4.15 The City Deal will directly influence the co-ordination of economic development across the region through its overarching economic development strategy and investment choices. The latter will be directed towards delivering transport schemes, such as the South East Wales Metro and the Valleys Line Electrification; unlocking housing and employment sites; and developing research and innovation facilities. In the longer term, a strategic development plan will provide the spatial perspective of the economic development strategy and represent the overarching framework for development across the city-region.
- 4.16 The economic conditions of both Blaenau Gwent and the wider region will be significantly improved over the next 20 years if the City Deal delivers the level of jobs, growth and investment anticipated. It could prove to be a catalyst in delivering allocated development sites and will be a factor in determining whether undeveloped allocations remain deliverable over an extended plan period.

Enterprise Zones

- 4.17 In 2012, Ebbw Vale was designated as an Enterprise Zone based on four sites that are allocated and/or protected in the LDP; namely, Rhyd y Blew and Bryn Serth (MU1), 'The Works' (MU2), Tredegar Business Park (EMP 2.1) and Rassau (EMP 2.2). The sites have been identified as a focal point for advanced manufacturing, specialising in the automobile sector.
- 4.18 The boundary of the Enterprise Zone was extended in 2017 to include three additional employment sites which are allocated and/or protected for employment purposes by the LDP; namely Tafarnaubach Industrial Estate (EMP 2.5), Waun-y-Pound Industrial Estate (EMP 2.3) and Festival Park (EMP 2.4). In doing so, these sites become more attractive locations for new investment while also benefiting existing businesses.
- 4.19 The Enterprise Zone will assist with the transformation of the local economy in Blaenau Gwent and attract major inward investment, focussing on the manufacturing sector. It will expand the industrial base and attract major companies to the area with the aim of creating jobs for local people. In order to attract businesses to the area, the Enterprise Zone offers a combination of measures and funding, including tax relief, capital grants, superfast broadband and the possibility of a simplified planning regime.
- 4.20 In combination with City Deal proposals, Enterprise Zone status should stimulate economic development within the County Borough, facilitating the delivery of allocated employment allocations and enabling the expansion of existing businesses and the safeguarding of jobs on existing employment sites. Again, this will be a factor in determining whether undeveloped allocations remain deliverable over an extended plan period and whether the policy approach to employment protection remains appropriate.

Circuit for Wales

- 4.21 Since adoption of the LDP, there has been one major planning application in Blaenau Gwent which could have a significant impact on the economic future of the area: The proposed Circuit of Wales. This major development received outline planning permission in September 2013 and could be a world-class automotive cluster, centred on a performance circuit designed to host international motor sport events such as MotoGP, World Superbikes, World Motorcross and World Touring Car. In doing so, it will provide a major addition to the UK's portfolio of leading motor sports facilities.
- 4.22 In addition to the main circuit there will also be:

- A low carbon technology park adjacent to the circuit to cater for higher specification research, development and support services in the automotive sector;
- Commercial space for retail units;
- Hotel and facilities for leisure; and
- A leading motor sports race academy and training facility to develop young riders and drivers, host international race schools and provide wider safety and driver education and training.

4.23 The delivery of the Circuit of Wales development would have a significant positive effect on the local and wider economy, providing around 2,000 jobs and increasing the value of the economy through the production of goods and services. It is also anticipated to deliver new B1 and B8 floor space. If the development does come forward as anticipated, its implications for future employment and other land use requirements would need to be taken into account as part of preparing a revised LDP.

Q9	Do you agree that the main contextual changes have been identified?
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5.0 SHOULD LDP POLICIES, ALLOCATIONS AND DESIGNATIONS BE RETAINED, REVISED OR REMOVED?

- 5.1 To date, the full review has involved consideration of the findings of preceding annual monitoring reports, changes in national policies and other key contextual changes. Internal consultation has also been undertaken with a range of specialist officers, which focussed on LDP policy effectiveness and the potential need to revise existing policies. The findings of this work are set out in a range of topic based background papers which, amongst other things, highlight the success or failure in the implementation and delivery of LDP policies, allocations and designations.
- 5.2 The following table provides an overview of whether an LDP policy, allocation or designation is being delivered or functioning effectively, or whether some form of revision is likely to be required based on the analysis undertaken so far.

Table 1 – Strategic Policies

Strategic Policies	Comment
SP1 Northern Strategy Area – Sustainable Growth and Regeneration	Remains broadly appropriate but should be reviewed as part of the reconsideration of the growth and regeneration strategy.
SP2 Southern Strategy Area – Regeneration	Remains broadly appropriate but should be reviewed as part of the reconsideration of the regeneration strategy.
SP3 The Retail Hierarchy and Vitality and Viability of the Town Centres	Revise to reflect any change in approach to town centres and updated retail requirements over an extended plan period.
SP4 Delivering Quality Housing	Revise to reflect the reconsideration of the development strategy, viability of housing allocations, affordable housing requirements and gypsy and traveller need.
SP5 Spatial Distribution of Housing Sites	Revise to reflect the reconsideration of the development strategy and housing requirement over an extended plan period.
SP6 Ensuring Accessibility	Functioning effectively – minor amendments required to reflect contextual changes.
SP7 Climate Change	Functioning effectively – minor

	amendments required to reflect the varying success on the delivery of district heating networks on strategic sites.
SP8 Sustainable Economic Growth	Revise to reflect the reconsideration of the development strategy and employment land requirement over an extended plan period.
SP9 Active and Healthy Communities	Functioning effectively – minor amendments required to reflect contextual changes.
SP10 Protection and Enhancement of the Natural Environment	Functioning effectively.
SP11 Protection and Enhancement of the Historic Environment	Revise to ensure consistency with national policy.
SP12 Securing an Adequate Supply of Minerals	Revise to reflect apportionment requirements identified in the most up-to-date Regional Technical Statement.
SP13 Delivering Sustainable Waste Management	Revise to reflect changes in national policy and advice.

Table 2 – Development Management Policies

Development Management Policies	Comment
DM1 New Development	Revise to reflect changes in national policy and improve clarity.
DM2 Design and Placemaking	Functioning effectively – minor amendments required to improve clarity.
DM3 Infrastructure Provision	Functioning effectively.
DM4 Low and Zero Carbon Energy	Revise to reflect the need to change specific criterion and address standalone low and zero carbon energy developments.
DM5 Principal and District Town Centre Management	Revise to reflect any change in approach to town centres.
DM6 Management of Blaina Town Centre	Revise to reflect any change in approach to town centres.
DM7 Affordable Housing	Revise, if necessary, as part of the reconsideration of housing allocation viability and affordable housing requirements and improve effectiveness in addressing extensions to housing sites.
DM8 Affordable Housing Exceptions	Functioning effectively.

DM9 Caravan Site for Gypsies and Travellers	Revise to improve clarity.
DM10 Use Class Restrictions	Revise, if necessary, as part of the reconsideration of the degree of flexibility in the type of uses allowed on primary and secondary employment sites.
DM11 Protection of Community and Leisure Facilities	Functioning effectively – additional guidance on defining ‘surplus to requirements’ would assist with interpretation of policy.
DM12 Provision of Outdoor Sport and Play Facilities	Revise, if necessary, as part of the reconsideration of development thresholds.
DM13 Protection of Open Space	Functioning effectively.
DM14 Biodiversity Protection and Enhancement	Functioning effectively.
DM15 Protection and Enhancement of the Green Infrastructure	Functioning effectively.
DM16 Trees, Woodlands and Hedgerows Protection	Revise to improve clarity.
DM17 Buildings and Structures of Local Importance	Functioning effectively.
DM18 Criteria for the Assessment of Mineral Applications	Revise to improve clarity.
DM19 Mineral Safeguarding	Revise to improve clarity.
DM20 Waste	Revise or potentially remove as result of changes to national policy and advice.

Table 3 – Allocations and Designations

Allocations and Designations	Comment
SB1 Settlement Boundaries	Revise to provide greater clarity on appropriate types of development in the countryside
MU1 Ebbw Vale Northern Corridor	Remains broadly appropriate but should be reviewed alongside all undelivered allocations to ensure that it remains deliverable over an extended plan period.
MU2 ‘The Works	Revise – certain allocations have been delivered and undelivered allocations should be reviewed to ensure that they remain deliverable over an extended

	plan period.
MU3 NMC Factory and Bus Depot	Remains broadly appropriate but should be reviewed alongside all undelivered allocations to ensure that it remains deliverable over an extended plan period.
AA1 Action Area	Remains broadly appropriate but should be reviewed to ensure that allocations remain deliverable over an extended plan period, taking into account updated retail requirements.
R1 Retail Allocations	Remains broadly appropriate but should be reviewed in the context of the potential loss of commitments, the need for allocations to remain deliverable over an extended plan period and updated retail requirements.
H1 Housing Allocations and H2 Housing Commitments	Revise – certain housing sites have been delivered and a review of undeveloped allocations and commitments is required taking into account updated housing requirements.
GT1 Gypsy and Traveller Accommodation	Revise to address additional Gypsy and Traveller need.
T1 Cycle Routes	Revise – certain cycle routes have been delivered, a review of undelivered routes is required and new cycle and active travel routes need to be added.
T2 Rail Network and Station Improvements	Revise – certain rail improvements have been delivered and a review of undelivered rail improvements is required.
T3 Safeguarding of Disused Railway Infrastructure	Functioning effectively.
T4 Improvements to Bus Services	Revise – certain bus improvements have been delivered, a review of undelivered bus improvements is required and new bus improvements need to be added.
T5 New Roads to Facilitate Development	Remove – new roads delivered.
T6 Regeneration Led Highway Improvements	Revise – certain highway improvements have been delivered and a review of undelivered highway improvements is required.
EMP1 Employment Allocations	Revise – an employment allocation has been delivered and a review of undelivered employment allocations is

	required taking into account updated employment land requirements.
EMP2 Employment Area Protection	Revise to reflect any change in the status of sites within the employment hierarchy.
ED1 Education Provision	Revise – education allocation has been delivered, another is coming forward as anticipated and any new education provision needs to be added.
CF1 Community Centre	Remove – planning permission has been granted and one of the two community centre buildings is now in operation.
TM1 Tourism and Leisure	Revise – tourism related activities have been delivered on certain sites and a review of undelivered allocations is required.
L1 Formal Leisure Facilities	Retain or Remove – this undelivered allocation needs to be reviewed to determine whether it remains deliverable over an extended plan period.
ENV1 Green Wedges	Functioning effectively.
ENV2 Special Landscape Areas	Functioning effectively, although boundary changes will be required to the Trefil and Garnlydan Surrounds SLA if the Circuit for Wales development is delivered. An overall review is also required to reflect updated Landmap information and a need for greater cross boundary consistency with neighbouring authorities.
ENV3 Sites of Importance for Nature Conservation	Revise – new SINCS to be added and boundary changes required as result of development.
ENV4 Land Reclamation Schemes	Retain or remove - undelivered allocations need to be reviewed to determine whether they remain deliverable over an extended plan period.
ENV5 Cemeteries	Revise – certain cemetery extensions have been delivered, undelivered extensions need to be reviewed and any new cemetery provision needs to be added.
M1 Safeguarding of Minerals	Functioning effectively.
M2 Minerals Buffer Zone	Revise to reflect up-to-date planning permissions and the ceasing of mineral

	operations.
M3 Areas where Coal Working will not be Acceptable	Revise to reflect a consistent regional approach.
M4 Preferred Areas	Remains broadly appropriate but should be reviewed in the context of recent planning decisions and developer proposals for quarry extensions.
W1 Land for Waste Management	Revise – waste facilities have been delivered on certain sites and new requirements need to be added.

Q10	Do you agree with the findings of the review of LDP policy effectiveness?
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6.0 SHOULD THE LDP BE REVISED FOLLOWING THE FULL OR SHORT FORM REVISION PROCESS?

6.1 A key requirement of a Review Report is to make a conclusion on the revision procedure to be followed, which can be either a short form revision or a full revision. Welsh Government's LDP Manual (Edition 2, August 2015) provides guidance on factors that need to be considered when determining which revision procedure to follow. In particular, the Guidance highlights the importance of the need to maintain a 5 year land supply and extend the plan period so that the LDP has an operational life of at least 10 years after adoption (paragraph 10.2.2). It is anticipated that the end date of the revised LDP will need to be extended to 2036.

Full Revision Procedure

6.2 In general terms, the full revision procedure should be followed where the LDP's Strategy is out of date or not working and, as a consequence, a fundamental change to the level or spatial focus of growth is required. The end date of the revised LDP is also a factor as updated needs and land requirements over a longer time frame are more likely to result in significant changes to the LDP.

Short Form Revision Procedure

6.3 In contrast, a short form revision procedure can be undertaken where the LDP's strategy remains appropriate, a 5 year land supply can be maintained and the issues involved are not of sufficient significance to justify undertaking the full revision procedure. Importantly, in order to follow the short form procedure the local planning authority must be content that the revisions required would not:

- make the strategy unsound, and/or
- make the strategy incoherent or unrecognisable, and/or
- result in a plan distinctly different to the one adopted.

(LDP Manual, paragraph 10.2.6)

Conclusion

6.4 Based on findings of preceding annual monitoring reports together with the review of the evidence base and contextual changes, it is considered appropriate to revise the LDP following the full revision procedure. Important factors in reaching this conclusion include the inability to deliver the levels of growth required by the LDP's Strategy of 'Growth and Regeneration' and the resulting failure to maintain a 5 year land supply. The level of growth therefore needs to be reconsidered which could result in a significant change to the LDP's Strategy. In addition, the extent of changes required to the evidence base in order to extend the plan period to 2036 could result in a plan distinctly different from the adopted LDP.

Q11	Do you agree that it is appropriate to revise the LDP following the full revision procedure?
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For Office Use Only
Date Received:
Representor Number:
Comment Number:

Local Development Plan 2006 – 2021
 Full Review

APPENDIX 1 – CONSULTATION RESPONSE FORM

All comments should be returned by **5pm on 6th July 2017** to: **The Development Plans Manager, Floor 1A, Municipal Offices, Civic Centre, Ebbw Vale, NP23 6XB** or by e-mailing planningpolicy@blaenau-gwent.gov.uk

Contact Details

Personal Details	
Title	
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Last name	
Job Title*	
Organisation*	
Address Line 1	
Line 2	
Line 3	
Line 4	
Postcode	
Telephone No.	
E-mail Address*	

Agent Details (if any)

**Where Relevant*

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).

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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.

Agree		Neither Agree nor Disagree		Disagree	
Comments					

Question 3:

Do you agree that the affordable housing target should be reviewed based on a re-assessment 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).

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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?

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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?

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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.

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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?

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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.

Agree		Neither Agree nor Disagree		Disagree	
Comments					

Question 9:

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

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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.

Agree		Neither Agree nor Disagree		Disagree	
Comments					

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?

Agree		Neither Agree nor Disagree		Disagree	
Comments					

If you have any further comments relating to the full review of the LDP, please include them below.

Comments

Planning Policy Team

Blaenau Gwent County Borough Council
Municipal Offices
Civic Centre
Ebbw Vale
NP23 6XB

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