



communities first cymunedau yn gyntaf



Llywodraeth Cymru
Welsh Government

CYMUNEDAU YN GYNTAF CHWE CHLOCH
SIX BELLS COMMUNITIES FIRST

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Tŷ Ebbw Fach
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NP13 2ND
Tel: 01495 320497

18.9.2012.

Mr. Vincent Maher MA (Cantab) MCD MSc MBA MRTPI
Inspector.
General Offices
Steel Works Road.
Ebbw Vale
NP23 6DN

Dear Mr. Maher,

RE: MATTERS ARISING CHANGES DURING EXAMINATION HEARINGS

I am writing to you on behalf of The Six Bells Communities First Partnership Board and the community which it has been representing throughout the LDP process regarding the above and would wish to raise the following in regard to Matters Arising Changes.

MAC S07: Amendment of Policy DM1

Addition made: *“There would be no unacceptable adverse visual impact on townscape or landscape”*
The Board feels that the Councils statement does not go far enough and should be rewritten to state:
“THERE WILL BE NO UNACCEPTABLE ADVERSE VISUAL IMPACT ON TOWNSCAPE, LANDSCAPE, BUILDINGS OR STRUCTURES OF LOCAL IMPORTANCE”

MAC S21

Addition made: *“The site has no significant amenity, nature conservation or recreational value and...”*

The Board feels that the Councils statement does not go far enough and should be rewritten to state:
“THE SITE HAS NO SIGNIFICANT AMENITY, NATURE CONSERVATION, RECREATIONAL VALUE, OR HAS BUILDINGS OR STRUCTURES OF IMPORTANCE LOCATED ON IT”

MAC S23

The Board would wish to raise to the Inspectors attention Matters arising from The Hearing Session 5 The Council being requested under a Suggested Change / action "Consider any boundary alterations take account of the Guardian" that The Council disagreed with the suggested change and felt that it was "more appropriate to be considered through the updated Development Brief"

The Board does not feel that its concerns have been addressed and the MAC S23 does not take into account the original concerns as raised by the Board in regard to the boundary changes.

Throughout the Local Development Plan process, The Board has raised concerns regarding the Councils inclusion of a Six Bells Development Brief. The Board has raised this within its written responses and through its representative at the Hearing Sessions.

The Board still considers that the Councils LDP is unsound as it has continued to provide this document as an appendix to the LDP and has throughout the hearing referred back to this document when it is not a document which has been through any public / community consultation and has not been issued to the Councils own Scrutiny Committee which The Board understands make this document one which has not been ratified by The Council. During this process The Council has made reference and even proposals to amend the Development Brief to include a bridge. Again The Board would wish to strongly object to its inclusion within the LDP process and reiterate its belief that there LDP is therefore unsound.

MAC S24 Paragraph 7.91

The addition made: *"The retention of such buildings or structures should be encouraged and appropriate uses sought to maintain their essential character. A local list of such buildings will be compiled from visual surveys and consultation with local interest groups. Supplementary planning guidance will set out the methodology for such a list"*

The Board feels that the Councils statement does not go far enough and should be rewritten to state:
"THE RETENTION OF SUCH BUILDINGS AND STRUCTURES WILL BE GUARANTEED AND DEVELOPMENTS WILL ONLY TAKE PLACE WHICH DO NOT INFRINGE UPON ACCESS, BOTH VISUAL AND PHYSICAL."

The Board raises concerns in regard to the timing of the proposed list especially when there are existing proposals under this Local Development Plan to install 72 houses of which all will require access on the top plateau above Guardian on the former Six Bells Colliery Site and the proposed school on the lower plateau. This statement does not outline any guaranteed protection of Guardian as a structure.

The Board would also raise concerns again as BGCBC have outlined in their responses (MA5.1) that they have taken into consideration this through the amendment of this policy DM18 which as outlined above does not in The Boards opinion does not provide any guaranteed protection of Guardian as a structure of local (and National) importance.

MAC S24 continued:

Addition made:

"A local list of such buildings will be compiled from visual surveys and consultation with local interest groups"

The Board feels that the Councils statement does not go far enough and should be rewritten to state:
"A BOROUGH WIDE LIST OF SUCH BUILDINGS AND STRUCTURES WILL BE COMPILED FROM VISUAL SURVEYS, FULL COMMUNITY CONSULTATION, INCLUDING COMMUNITY

GROUPS, AND THE IMPORTANCE OF THE BUILDING AND STRUCTURE UPON ECONOMIC REGENERATION STRATEGIES SUCH AS TOURISM”

The Board would wish to raise that this statement is also excluding the wider population / community who have actively worked and supported community led developments whilst not necessarily being involved in a local interest group. The Board would request that this statement is far more inclusive of the local population / communities

Table 11 (Page 18 of Matters Arising Changes)

Objective 14 SP11,DM18,TM1

“Number of listed or local buildings of historical value brought into use for tourism”

This should also relate back to buildings and structures of local importance. The Board would also wish to raise concerns regarding the timescales as outlined within this table with particular reference to Guardian and the potential that this structure will not be included within this context and also added issues of the proposed housing and school and that these timescales should link to ensure an important structure such as Guardian is appropriately listed as protected prior to any such further development is undertaken / explored.

Six Bells LNR and SINC:

The Board would wish to raise to The Inspectors attention to both the LNR and SINC on the former colliery site.

Attached are two maps outlining both the SINC and the LNR and a map outlining the previous LNR.

The Board understands that the designation of the LNR has been a three year process. The Board also understands that this is ‘outside’ of the LDP process. It is in regard to this which the Board would wish to raise concerns and would recommend that any such development should be included within the LDP so that a full overview of all developments on the site can be taken into account to support informed decision making. The Board has concerns that by having a separate process to designate the LNR (and SINC) that it does not take into account the issues as raised under the LDP process and visa versa.

As highlighted on the attached maps, the proposed LNR has ‘taken into account’ the railway alignment which arguably should have been included within the LDP especially as this area has been highlighted under the Focused Changes.

The Board would also wish to highlight the SINC area. This clearly runs across the area which under the LDP is being proposed for the new primary school.

It is The Board’s understanding that under DM15 Biodiversity Protection and Enhancement that;
“Development proposals will only be permitted within, or in close proximity to sites designated as sites of Importance for Nature Conservation (SINCs), and Local Nature Reserves (LNRs), or that effect the ecological corridors and Priority Habitats and Species, where either;

- a. It maintains or enhances the ecological or geographical importance of the designation, or
- b. The need for the development outweighs the nature conservation importance of the site and it can be demonstrated that the development cannot reasonably be located elsewhere and compensatory provision will be made equivalent to that lost as a result of the develop”

The Board feels that the proposed developments within the areas proposed do not maintain or enhance the ecological or geographical importance of the designation.

The Board would also wish to seek information as to whether point 'b' has been taken into full consideration within the LDP, and where on this site would BGCBC be providing the required compensatory provision as outlined under DM15 should BGCBC be successful in their efforts as outlined within the LDP (The development of the school and housing sites on the former colliery site)

On behalf of The Six bells Communities First Partnership Board and the community which it is representing, I would like to take this opportunity to thank you for your guidance throughout the Local Development Plan process.

Yours sincerely,



Ms. Mair Sheen.

Six Bells Communities First Coordinator.

On behalf of The Six Bells Communities First Partnership Board.

Six Bells

Candidate Local Nature Reserve

Scale 1:5000

Blaenau Gwent County Borough Council
Business Resource Centre
Tafarnaubach Industrial Estate
Tredegar
Blaenau Gwent, NP22 3AA



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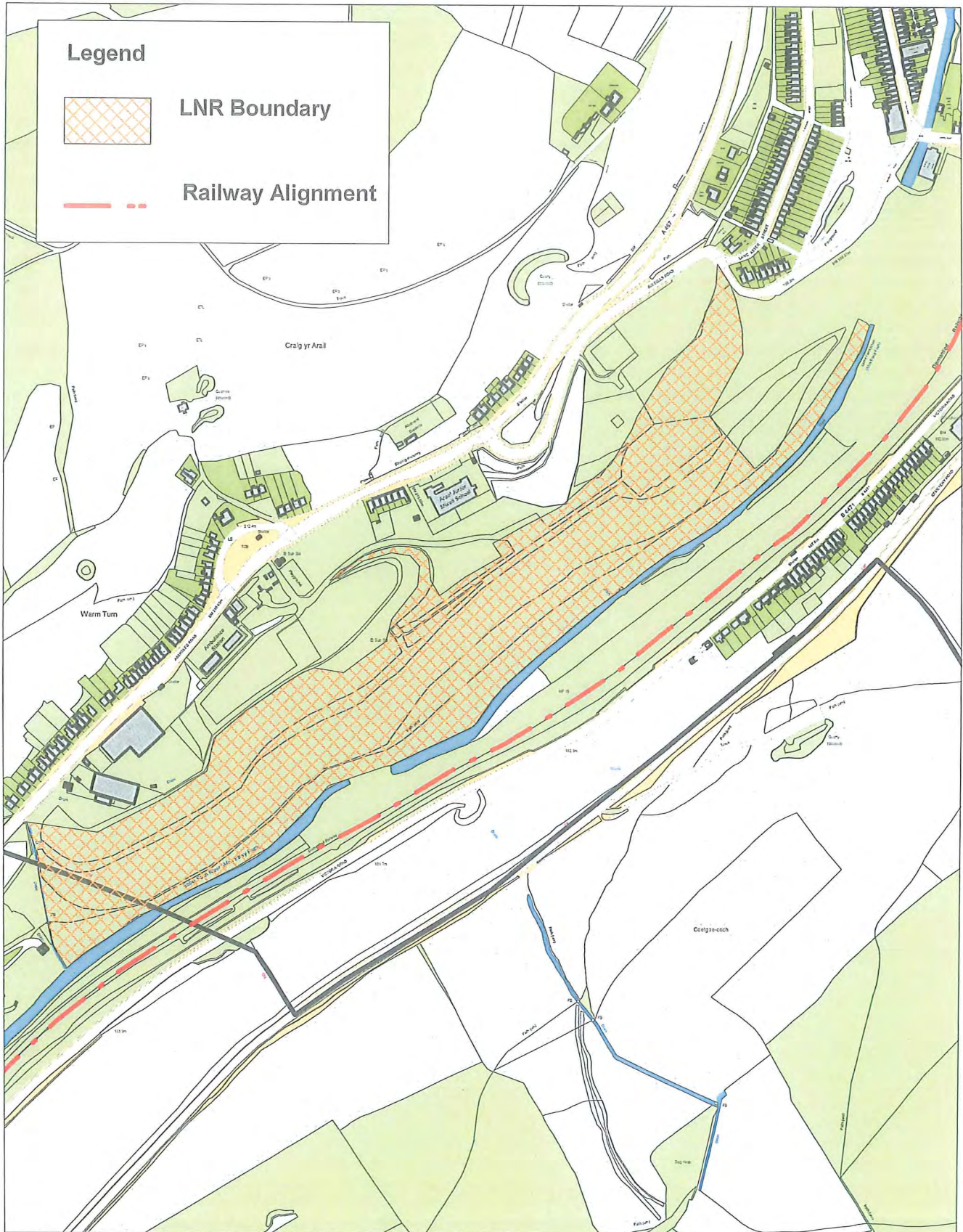
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Six Bells candidate Local Nature Reserve

Blaenau Gwent County Borough Council
Business Resource Centre
Tafarnaubach Industrial Estate
Tredegar
Blaenau Gwent, NP22 3AA



Scale 1:4500



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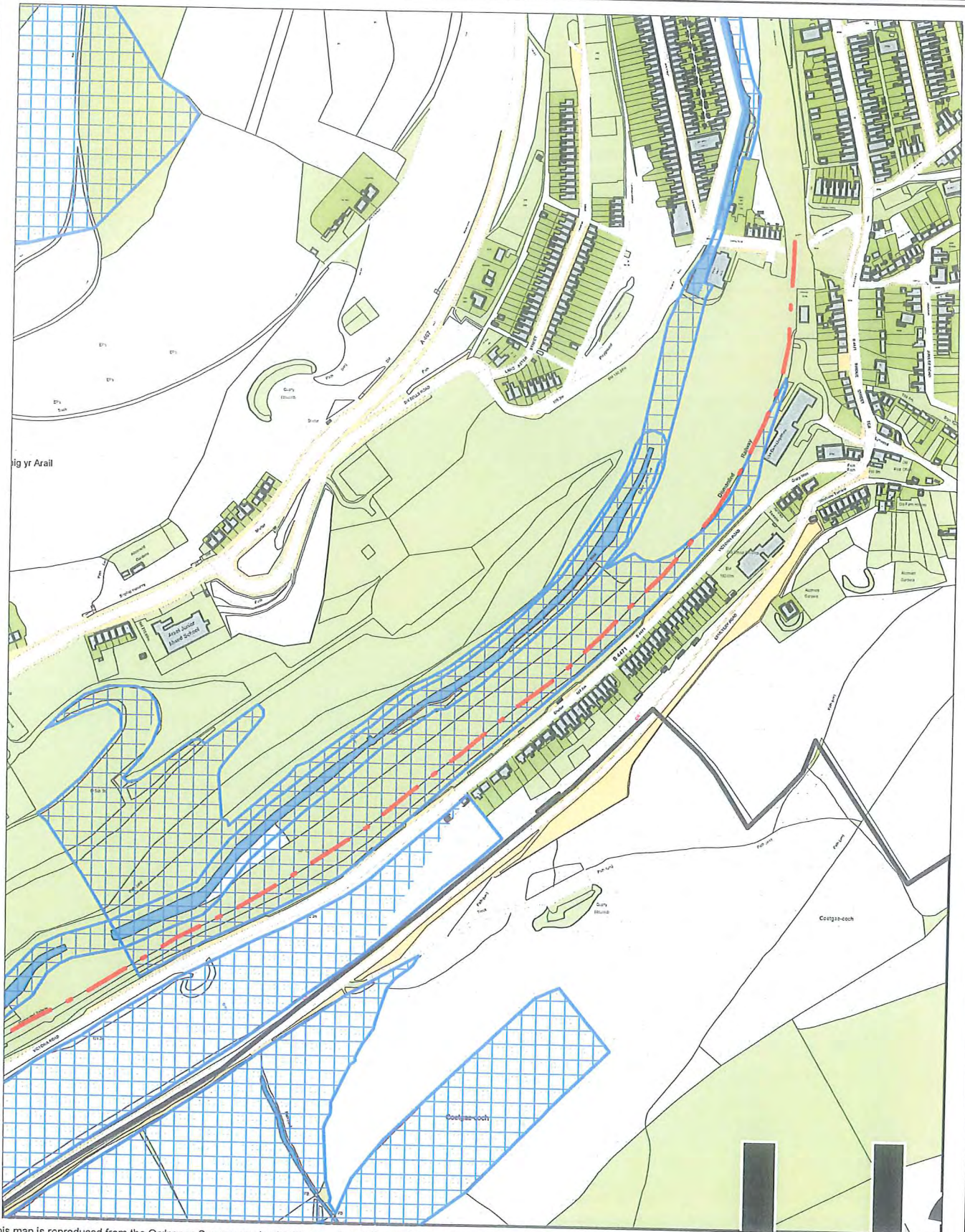
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Six Bells SINC

Blaenau Gwent County Borough Council
Business Resource Centre
Tafarnaubach Industrial Estate
Tredegar
Blaenau Gwent, NP22 3AA



Scale 1:4000



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