



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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Our Ref: C09.91.08/287779/RJ/JAE

13 September 2012

Dear Mrs John

**BLAENAU GWENT COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN
EXAMINATION****MATTERS ARISING CHANGES**

Thank you for your letter of the 24 July consulting us on the matters arising changes resulting from the examination hearings into the Local Development Plan.

Please find attached comments from the Countryside Council for Wales.

If you have any queries or require further information please contact us.

Yours sincerely

Richard Jones
Team Leader
Monmouthshire and Eastern Valleys



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Prif Swyddfa/Headquarters

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Blaenau Gwent County Borough Council Local Development Plan Examination Matters Arising Changes

Comments of the Countryside Council for Wales

MAC SO4: Policy SP10

CCW has concerns about the deletion of former point D which sought to protect features of ecological or geological interest. Although new point f addresses the requirement to produce a net gain in biodiversity, reference to the requirement to protect features of geological interest has been lost from the policy.

This could be amended by adding a new supporting sentence/paragraph to the policy to state that '*Features which make a significant contribution to the character, quality and amenity of the landscape including features of geological interest.*'

Or alternatively;

by amending *biodiversity* in new point f to '**nature conservation**'. This would be consistent with the definition of '*nature conservation*' in TAN5 *Nature Conservation and Planning* which includes the conservation of biodiversity and geodiversity.

MAC SO7: DM1 (2a)

CCW welcome the proposed amendment and considers it meets tests of soundness CE1 and CE2.

MAC S12: DM5

CCW welcome the proposed amendments and consider that they meet tests of soundness CE1 and C2.

MAC S21: DM14

CCW welcome the proposed amendments and consider that they meet test of soundness C2.

MAC S25:DM19

CCW consider the proposed amendments meet Test of Soundness C2

MAC CO2 Objective 7

CCW welcomes the improved clarity to the objective which helps ensure that the plan flows more logically and meets test of soundness CE1.

MAC CO3 Objective 12

CCW welcomes the improved clarity to the objective which helps ensure that the plan flows more logically and meets test of soundness CE1.



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MAC C19 DM1(1f)

CCW welcomes the additional criterion, which provides improved clarity to the flow of the policy and the Plan, consistent with Test of Soundness CE1.

MAC C20 DM1(2)

CCW welcome the changes which contribute to a more logical overarching policy DM1, and to the logical flow of the plan.

MAC C48 Paragraph 8.85

CCW welcomes the additional text and the clarification it provides to the Plan.

MAC C49 Paragraph 8.88

As the Wildlife and Countryside Act places a duty on the LPA and other Section 28G authorities to take reasonable steps, consistent with the authority's functions, to further the geological features by reason of which the site is of special scientific interest, we recommend that MAC C49 is amended to more accurately reflect the requirements of the legislation and the scientific interest as follows:

The most significant issue that will need to be addressed will be to ensure the conservation of the special interests of the nationally important SSSI at Mynydd Llangynidr, which includes the finest array of collapse (caprock) dolines and subsidence basins seen anywhere in Britain.



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