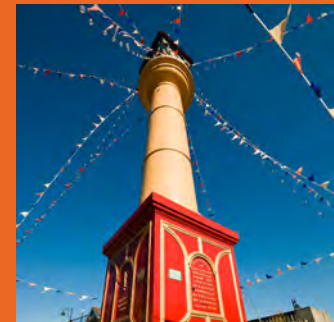


Blaenau Gwent County Borough Council
Cyngor Bwrdeisdref Sirol Blaenau Gwent

Appendix 22 of Consultation Report



Report of Representations

Adroddiad o'r Cynrychioliadau

Deposit Local Development Plan

Cynllun Adeneuo Datblygu Lleol

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**PART 1: POLICY
REPRESENTATIONS IN
DEPOSIT PLAN ORDER**

Procedural

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Support /Object	Comment
1D.91	Mr P Davidson	Unsound (CE2, CE3)	Objects to the methods of consultation used as no library in Llanhilleth and difficult to locate comment forms on website.
80D.311	Ian Roberts Consultancy on behalf of Mr Idris Watkins (Mr I Roberts)	Unsound (P1, C2, CE1, CE2, CE4)	Objects to the lack of consultation with the owner of Ty Pwdr land.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Objects to the methods of consultation used as no library in Llanhilleth and difficult to locate comment forms on website (Mr P Davidson)
- Objects to the lack of consultation with the owner of Ty Pwdr land (Mr I Roberts)

Desired Changes to LDP

- Change not clearly stated (Mr P Davidson, Mr I Roberts)

COUNCIL RESPONSE

Council Analysis

- **Objects to the methods of consultation used as no library in Llanhilleth and difficult to locate comment forms on website** (Mr Paul Davidson)

Disagree. Copies of the Deposit Local Development Plan and supporting documents were available to view during the consultation period at a number of locations throughout the County Borough including all libraries. It is acknowledged that there is no permanent library in Llanhilleth although it should be noted that there is one at Abertillery. The nearest location where the representor could view the documents was at Llanhilleth Institute, which is considered to be within reasonable distance from the representor's home address.

It is recognised that there is an inconsistency as the Site Notices state that 'Representation Forms' are available on the Council website but the website actually lists them under 'Comment forms'. It should be noted that no other complaints have been received regarding problems accessing the comment forms.

- **Objects to the lack of consultation with the owner of Ty Pwdr land** (Mr I Roberts)

Disagree. Anyone with an interest in land was invited to submit sites to us between April 2007 and July 2007 for consideration for potential inclusion in the Local Development Plan. The Council records show that Mr Idris Watkins was formally invited as a local landowner and therefore had the opportunity to put forward Ty Pwdr land as this stage. As no site came forward the Council included the site as an undeveloped UDP allocation. The candidate site process remained open until the end of the Preferred Strategy consultation. The sites, known as D26 – Greenmeadow Farm and D27 – Ty Pwdr Farm / Greenmeadow Farm are the UDP allocation boundaries.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Chapter: 1.0 Introduction (Paragraphs 1.1 – 1.27)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.150	Welsh Government (WG)		Provide clarity on the plan's relationship with existing and emerging LDPs of neighbouring plan areas with regard to the mapping of areas such as Green Wedges, Special Landscape Areas and Mineral Safeguarding Areas.
3D.151	Welsh Government (WG)		Clarity is required in that the LDP excludes the national park and that the BBNP Authority is preparing a LDP for the whole area of the park.
10D.224	Countryside Council for Wales (CCW)	Unsound (CE1)	To improve clarity, paragraph 7.3 of the Development Management Chapter should be moved to Chapter 1.0 under the How to Use this Document section.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none">• Clarify the Plan's relationship with existing and emerging LDPs of neighbouring plan areas (WG)• Clarity required on the LDP and Brecon Beacons National Park (WG)• Relocate paragraph 7.3 to Chapter 1.0 (CCW)

Desired Changes to LDP

- Explain the plan's relationship with the existing and emerging LDPs of neighbouring plan areas with regard to the mapping of areas such as Green Wedges, Special Landscape Areas and Mineral Safeguarding Areas (WG)
- Include a statement explaining that the LDP excludes the national park and that the BBNP Authority is preparing an LDP for the whole area of the park (WG)
- Relocate paragraph 7.3 to Chapter 1.0 under the How to Use this Document section (CCW)

COUNCIL RESPONSE

Council Analysis

- **Clarify the Plan's relationship with the existing and emerging LDPs of neighbouring plan areas (WG)**

The relationship of the policies of the Deposit LDP with those of neighbouring authorities are considered throughout the Plan, and throughout the Background Papers and other elements of the evidence base.

Agree. To reflect this relationship more clearly add a sentence at the end of paragraph 1.13 to read:

In preparing the Deposit Plan, the Council has worked closely with neighbouring local planning authorities to ensure cross boundary issues have been taken into account.

- **Clarity required on the LDP and Brecon Beacons National Park (WG)**

Agree. Amend second sentence of Paragraph 1.1 to read:

The aim is to provide developers and the public with certainty about the planning framework for Blaenau Gwent, *excluding the area that falls into Brecon Beacons National Park.*

Following this, add a further sentence to paragraph 1.1 to read:

The Brecon Beacons National Park Authority is preparing a Local Development Plan for the whole area.

- **Relocate Paragraph 7.3 to Chapter 1.0 (CCW)**

Agree. Delete paragraph 7.3 in the Development Management Chapter and relocate to Chapter 1.0 to appear as the first paragraph under the How to Use this Document section.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the

Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the following sentence is added to the end of paragraph 1.13 to read:

In preparing the Deposit Plan, the Council has worked closely with neighbouring local planning authorities to ensure cross boundary issues have been taken into account.

That the Council recommend to the Planning Inspector that the second sentence of paragraph 1.1 is amended to read:

The aim is to provide developers and the public with certainty about the planning framework for Blaenau Gwent, *excluding the area that falls into Brecon Beacons National Park.*

That the Council recommend to the Planning Inspector that a further sentence is added to paragraph 1.1 to read:

The Brecon Beacons National Park Authority is preparing a Local Development Plan for the whole area.

That the Council recommend to the Planning Inspector that paragraph 7.3 in the Development Management Chapter be relocated to Chapter 1.0 to appear as the first paragraph under the How to Use this Document section.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Chapter: 2.0 Policy Context (Paragraphs: 2.1 – 2.39)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
82D.380	Six Bells Communities First (SBCF)		The Six Bells Tourism Strategy should be identified within the Policy Context chapter of the Plan.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issue identified in the representation is as follows:

- The Six Bells Tourism Strategy should be identified (SBCF)

Desired Changes to LDP

- The Six Bells Tourism Strategy should be identified within the Policy Context chapter of the Plan (SBCF)

COUNCIL RESPONSE

Council Analysis

- **The Six Bells Tourism Strategy should be identified (SBCF)**

Disagree. Chapter 2: The Policy Context sets out the key elements of European, National, Regional and Local Policy that have influenced the Plan i.e. the key strategies are identified, and the role of the LDP as the means of delivering the land use elements of these and other strategies is specified.

The Policy Context is already 7 pages long and consists of 39 paragraphs, and it is considered that it should only be extended on compelling grounds. The Six Bells Tourism Strategy is one of a number of strategies in existence and it is considered inappropriate to refer to all strategies. It is therefore considered that the Policy Context chapter should not be amended to show that the Six Bells Strategy meets the criteria of the Wales Spatial Plan, Turning Heads and other Local Strategies, nor should the Six Bells Tourism

Strategy be specifically identified in this Chapter.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Chapter: 3.0 Blaenau Gwent Context and Challenges (Paragraphs 3.1 – 3.24)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.152	Welsh Government (WG)		The Written Statement does not clarify how the needs and interests of the Welsh language have been taken into account in plan preparation (PPW paragraph 4.12.2).
10D.16	Countryside Council for Wales (CCW)	Sound (C2, C3)	Welcomes the recognition of the value of the natural environment in its own right, and in its contribution to the economic and social well being of Blaenau Gwent.
41D.345	DTZ for Questedge Ltd (DTZ)		Supports challenge 2 which identifies new roles for the town centres and the need to address high vacancy rates and the low presence of national retailers.
49D.324	Pontypool Park Estate (PPE)		Supports a useful list of fourteen challenges and remedies identified in Chapter 3.0.
49D.326	Pontypool Park Estate (PPE)		Objects to challenge 3 and the proposal to increase the population and build more houses.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issue identified in the representation are as follows:

- Clarification required on how the needs and interests of the Welsh language have been taken into account (WG)
- Supports paragraph 3.19 (CCW)
- Supports challenge 2 (DTZ)
- Supports the list of challenges identified in Chapter 3.0 (PPE)
- Objects to challenge 3 to increase the population and build more houses (PPE)

Desired Changes to LDP

- Explain how the needs and interests of the Welsh Language have been taken into account (WG)
- The change is not clearly stated (PPE)

COUNCIL RESPONSE

Council Analysis

- **Clarification required on how the needs and interests of the Welsh language have been taken into account (WG)**

Agree. Add the following paragraphs under paragraph 7.18:

The Welsh language is integral to the character, culture and history of Wales. Whilst Blaenau Gwent does not have a large Welsh speaking population as found in other parts of the Country, the Council is keen to ensure that the spatial planning system protects and enhances Welsh culture and language where possible.

- **Supports paragraph 3.19 (CCW)**
Support welcomed.
- **Supports challenge 2 (DTZ)**
Support welcomed.
- **Supports the list of challenges identified in Chapter 3.0 (PPE)**
Support welcomed.
- **Objects to challenge 3 to increase the population and build more houses (PPE)**
This issue is dealt with under Strategic Policy 4 and 5.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the following sentenced be added at the end of paragraph 3.20 as follows:

The Welsh language is integral to the character, culture and history of Wales. Whilst Blaenau Gwent does not have a large Welsh speaking population as

found in other parts of the Country, the Council is keen to ensure that the spatial planning system protects and enhances Welsh culture and language where possible.

Reason for Recommendation

To maintain the soundness of the Plan.

Chapter: 4.0 Vision and Objectives (Paragraphs: 4.1 – 4.3)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.183	Countryside Council for Wales (CCW)	Sound (C2)	Welcomes the Vision for the LDP and considers that it achieves a balance between economic, social and environmental objectives.
10D.184	Countryside Council for Wales (CCW)	Unsound (CE1)	Omission of an objective for the protection, enhancement and management of the County Borough's landscape, which results in the objectives failing to flow logically overall from the plan's Vision.
10D.185	Countryside Council for Wales (CCW)	Sound (C2)	Support for objectives 1, 4, 5 and 6.
10D.187	Countryside Council for Wales (CCW)	Unsound (CE2)	Questions the realistic delivery of the level of housing proposed in objective 3 based on past completion rates.
10D.188	Countryside Council for Wales (CCW)	Unsound (CE1)	Given that the 'Ebbw Vale Northern Corridor' allocation incorporates 2 SINCs, amend objective 7 to include a reference to County residents also benefiting from the protection and enhancement of the natural environment.
10D.192	Countryside Council for Wales (CCW)	Sound (C2)	Support for objective 8 which aims to diversify the economic base of the County, which is in conjunction with the sustainable aims for development set out in objective 5.
10D.193	Countryside Council for Wales (CCW)	Unsound (CE2)	Although supports the aim of delivering employment opportunities for local people, questions the realistic delivery of 50 ha of employment land during the plan period.
10D.196	Countryside Council for Wales (CCW)	Sound (C2)	Support for objective 10.

10D.198	Countryside Council for Wales (CCW)	Sound (C2, CE1)	Support for objectives 11, 12, 13 and 14.
10D.201	Countryside Council for Wales (CCW)	Sound (CE1)	Support for objective 15.
10D.202	Countryside Council for Wales (CCW)	Sound (C2)	Support for objective 16.
19D.93	DPP for Newbridge Construction Ltd (DPP)	Sound	Fully supports the Vision for Blaenau Gwent and the four key themes and sixteen objectives for delivering the vision.
19D.94	DPP for Newbridge Construction Ltd (DPP)	Sound	Support for objectives 1 and 7.
21D.340	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Sound	Support for the Vision.
21D.341	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Sound	Support for the objectives in particular objective 7 which identifies that the regeneration plans for the Ebbw Vale Northern Corridor will have been delivered by 2021. Land at Rhyd y Blew will be a key part of the regeneration of the Ebbw Vale Northern Corridor.
41D.349	DTZ for Questedge Ltd (DTZ)		Supports the Vision of the Plan.
49D.328	Pontypool Park Estate (PPE)		Objects to the proposed increase in the population and the construction of more houses in objectives 2 and 3.
82D.381	Six Bells Communities First (SBCF)		Paragraph 4.3 fails to recognise the regeneration work that has been carried out by Six Bells Communities First and its associated groups. There is a need to continue the partnership working between BGCBC and Six Bells Communities First.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by

	neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues

The key issues identified in the representation are as follows:

- Supports the Vision for Blaenau Gwent (DPP) (CCW) (GVA) (DTZ)
- Omission of an objective for the protection, enhancement and management of the County Borough's landscape (CCW)
- Support for objectives 1, 4, 5, 6, 8, 10, 11, 12, 13, 14, 15 and 16 (CCW)
- Questions the deliverability of proposed housing in objective 3 (CCW)
- Amend objective 7 to include a reference to County residents also benefiting from the protection and enhancement of the natural environment (CCW)
- Questions the deliverability of 50 ha of employment land (CCW)
- Support for objectives 1 and 7 (DPP)
- Supports the objectives in particular objective 7 (GVA)
- Objects to objectives 2 and 3 (PPE)
- Failure to recognise the regeneration work that has been carried out by Six Bells Communities First and its associated groups (SBCF)

Desired Changes to LDP

- To meet test of soundness CE1, an objective should be included on the protection, enhancement and management of the County Borough's landscape (CCW).
- The change is not clearly stated (CCW)
- To meet test of soundness CE1, amend objective 7 to include a reference to the County residents also benefiting from the protection and enhancement of the natural environment (CCW)
- The change is not clearly stated (CCW)
- The change is not clearly stated (PPE)
- The change is not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Supports the Vision for Blaenau Gwent** (DPP) (CCW) (GVA) (DTZ)
Support welcomed.
- **Support for objectives 1 and 7** (DPP)
Support welcomed.

- **Omission of an objective for the protection, enhancement and management of the County Borough's landscape (CCW)**

Agree. Amend objective 12 to read:

The valuable landscape and natural heritage of Blaenau Gwent has been protected, enhanced and managed. Together they have ~~The unique landscape and together with the natural heritage,~~ has helped foster sustainable tourism and promoted community pride.

- **Support for objectives 1, 4, 5, 6, 8, 10, 11, 12, 13, 14, 15 and 16 (CCW)**
Support welcomed.

- **Questions the deliverability of proposed housing in objective 3 (CCW)**

This issue is dealt with under Strategic Policy 4.

- **Amend objective 7 to include a reference to County residents also benefiting from the protection and enhancement of the natural environment (CCW)**

Disagree. This is not the purpose of this objective. However, it is accepted that a reference should be made in Strategic Policy 1 to the environmental benefits the site could offer would reflect the approach taken to 'The Works' and benefit the Plan. This issue is dealt with in more detail under Strategic Policy 1.

- **Questions the deliverability of 50 ha of employment land (CCW)**

Disagree. It is accepted that the employment land figure is challenging but unless the Council plans to meet this figure the area will continue to decline. Evidence collected through the plan preparation identifies that job prospects are considered of primary importance and in most need of improvement in Blaenau Gwent. Based on this, the Council has taken into account growth in the working age population and the aim to reduce unemployment in identifying future employment requirements.

The other issue to note is that a 5.0 ha tract of remediated land has outline planning permission at The Works site for a business hub. The other major source of completions is from the Ebbw Vale North site where some parts i.e. Bryn Serth has planning permission and the other significant parcel of land at Rhyd y Blew are already at pre-application discussion stage.

It should also be recognised that the following factors will assist in delivering the 50 ha of employment land:

- The new Convergence Programme of EU funding 2015-2020 which is likely to provide funding for business property development
- The recent designation of Blaenau Gwent as an Enterprise Zone with a combination of measures and funding which will prove attractive to businesses
- Major improvements planned for the A465 Heads of the Valleys Dualling which will improve connectivity for the area. It will run through Rassau Industrial Estate and is therefore very close to some of the employment designations.

If the Council does not aim for the employment land figure then it will plan to fail in terms of addressing the high unemployment rates and the resultant problems.

- **Objects to objectives 2 and 3 (PPE)**

This issue is dealt with under Strategic Policy 4 and 5.

- **Supports the objectives in particular objective 7 (GVA)**

Support welcomed.

- **Failure to recognise the regeneration work that has been carried out by Six Bells Communities First and its associated groups (SBCF)**

Disagree. It is not appropriate to recognise the regeneration work that has been carried out in Six Bells in paragraph 4.3. The success of the recent developments in Six Bells is acknowledged in Policy SP2 and SP8 The Tourism Background Paper also identifies the regeneration projects that have been undertaken in this area.

The Plan recognises in paragraph 4.3 that there is a need for strong partnership working with various partners. Communities First remain an important partner to the Council especially when planning and delivering regeneration projects.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Objective 12 be amended as follows:

The valuable landscape of Blaenau Gwent has been protected, enhanced and managed The unique landscape and together with the natural heritage, has helped foster sustainable tourism and promoted community pride.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly, the change would not affect the soundness of the plan.

Chapter 5.0: Spatial Strategy (Paragraphs 5.1-5.16)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.158	Welsh Government (WG)		Possible typo with regards the %age of new housing in the Northern Strategy Area and in the Southern Strategy Area; it is not clear where the remaining 9% will occur. Note that the monitoring framework gives a split across the 4 hub areas that =100.
10D.203	Countryside Council for Wales (CCW)	Unsound (C2, CE1)	To deliver sustainable development in line with national policy and the plans vision, and meet C2 & CE1 the strategy should refer to how the natural environment of the area will be protected and enhanced.
10D.204	Countryside Council for Wales (CCW)	Unsound (CE1)	To be consistent with the vision for the plan to protect and enhance the County's environment, and meet CE1, reference should also be made in the text to the retention of Sites of Importance for Nature Conservation.
15D.358	Mr N Morris		The LDP has not taken into account the real reasons why there is an ever decreasing population in the area and pays no regard to the existing residential needs.
21D.88	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Unsound (CE4)	The Plan should provide sufficient flexibility to potentially enable the delivery of other complimentary land uses. This will enable to plan to offer a degree of flexibility to respond to market demands and changing economic and social trends.
21D.90	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Sound	Fully supportive of the Northern Strategy Area and the recognition of Ebbw Vale as the principal hub where sustainable growth and regeneration will be

			focussed.
41D.350	DTZ for Questedge (DTZ)	Sound	Supports the strategy seeking high growth to help deliver the aims and objectives for the community, and match the ambitions of the stakeholders.
50D.51	The Coal Authority (CA)	Unsound (C2)	All development is at risk from mining legacy and will lead to potential sterilisation of surface coal resources. The economics of stabilising land needs to be considered. Prior extraction should be considered by the developer.
71D.342	Mr G Collier	Unsound (CE2)	The Local Centre of Blaina should be referenced in terms of the Holistic Area Regeneration Plan.
82D.382	Six Bells Communities First (SBCF)		Further consideration should be paid to continuation of Renewal area work to improve existing housing.
82D.383	Six Bells Communities First (SBCF)		Paragraph 5.14 needs to recognise the already successful developments within Six Bells.
82D384	Six Bells Communities First (SBCF)		The Plan fails to recognise the already successful tourist project within Six Bells and the developing social enterprise which will support this project and the Ebbw Fach trail.
83D.108	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	Confusion between the housing number in the UDP and LDP. The LDP makes provision for more than double the number in the UDP for less population.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Housing percentages do not add up (WG)
- The strategy lacks reference to the environment (CCW)
- SINC's are not covered (CCW)
- Not taken into account real reasons for population loss (Mr N Morris)
- Allow complimentary land uses at Ebbw Vale North (GVA)
- Support for northern strategy area and the recognition of Ebbw Vale as the principal hub (GVA)
- Support for strategy of high growth (DTZ)
- Mining legacy (CA)
- Include a reference to Blaina Town Centre (Mr G Collier)
- Consider renewal area work to improve existing housing (SBCF)
- Recognition to be made to Six Bells tourism project (SBCF)
- Reference needs to be made to social enterprise project at Six Bells (SBCF)
- Questions the population figures and housing need (Mr A Thomas)

Desired Changes to LDP

- Amend typographical error (WG)
- The strategy should include a reference to how the natural environment will be protected and enhanced (CCW)
- The text should refer to the retention of SINC's (CCW)
- Changes not clearly stated (Mr N Morris)
- Additional bullet point required to allow complimentary land uses at Ebbw Vale North (GVA)
- No changes proposed, although considers that the plan needs an appropriate policy framework for dealing with mining legacy (CA)
- Amend Paragraph 5.3 to read:
Each of the 4 hub areas plus the local centre of Blaina will be supported by Holistic Area Regeneration Plan (Harps) (Mr G Collier)
- Change not clearly stated (SBCF)
- Reference needs to be made to Six Bells tourism project (SBCF)
- Reference needs to be made to social enterprise project at Six Bells (SBCF)
- Change not clearly stated (Mr A Thomas)

COUNCIL RESPONSE

Council Analysis

- **Housing percentages do not add up (WG)**

Disagree. WG are seeking clarification on the percentage figures set out in paragraph 5.5 and 5.13 which identify 81% in the north and 11% in the south and question where the remaining 9% will occur. This is not a typographical error, the plan refers to over 40% in Ebbw Vale rather than using an exact figure. The remaining 9% is in the Ebbw Vale area. No change is required to the Plan.

- **The Strategy lacks reference to the environment (CCW)**

Disagree. This chapter sets out the spatial strategy and explains in paragraph 5.2 that the sensitivity of the environment and a sustainability appraisal determined the spatial strategy of Growth and Regeneration. Paragraph 6.1 also clearly states that the detail of the strategy is set out in the Strategic Policies. Policy SP10 covers the environment. In this respect the Plan is considered to accord with National Policy.

- **Reference to retention of SINC's (CCW)**

Disagree. This chapter has been written to provide an overview of the spatial strategy, the detail of how SINC's are to be dealt with is more appropriately dealt with in the Strategic Policies in the next chapter. It is considered that the inclusion of SINC's in the strategy would not aid the logical flow of the Plan.

- **Lack of understanding of reasons for population loss (Mr N Morris)**

Disagree. The suggestion that the plan fails to understand the reason for population loss is incorrect. Lack of employment opportunities and issues with town centres are covered in Challenges 1 and 2 of the Plan whereas addressing opportunities for our youth is dealt with in challenge 5. These issues are then covered by policies within the Plan (SP1, SP2 SP3, SP8, SP9, DM4, DM6, DM7, DM11, DM12, DM13, DM14, MU1, MU2, MU3, EMP1, ED1, CF1 TM1, L1).

- **Additional bullet point required to allow complimentary land uses at Ebbw Vale North (GVA)**

Disagree. The list of uses for the site is not meant to be exhaustive but to provide an overview of what the site will contain. This issue would more appropriately be addressed under Policy MU1.

- **Support for northern strategy area and the recognition of Ebbw Vale as the principal hub (GVA)**

Support welcomed.

- **Support for strategy of high growth (DTZ)**

Support welcomed.

- **Mining legacy (CA)**

The Objector recognises that they do not have an issue with the strategy due to the fact that all development is likely to be at risk from mining legacy. The issue is having a policy framework in place to deal with the legacy issues; this issue is more appropriately dealt with under Policy DM1.

- **Include a reference to Blaina Town Centre (Mr G Collier)**

Disagree. This paragraph refers to Holistic Area Regeneration Plans (HARPS) which cover the 4 hub areas of Tredegar, Ebbw Vale, Upper Ebbw Fach and Lower Ebbw Fach. It is considered that reference to Blaina within this sentence would confuse the matter.

- **Consider renewal area work to improve existing housing (SBCF)**

Disagree. The need for further consideration of renewal areas to improve existing houses is already covered in Policy SP4 and paragraph 6.31. It is not considered appropriate to include reference to this within the Strategy.

- **Reference needs to be made to Six Bells tourism project (SBCF)**

Disagree. The comment suggests that when Abertillery explores opportunities to develop complimentary roles around leisure and tourism that it also recognises the already successful development within Six Bells. This is noted, however the Spatial Strategy only provides an overview and is not meant to cover all projects that are in existence.

- **Reference needs to be made to social enterprise project at Six Bells (SBCF)**

Disagree. The projects mentioned are those proposed in the LDP. The already successful project within Six Bells does not fall within this category.

- **Questions the population figures and housing need (Mr A Thomas)**

Disagree. The objector points to the UDP housing figures to question why there is a need for more houses in the LDP. The UDP identified sufficient houses to accommodate 73,725 people by 2011. Logically he argues that the LDP, which aims to accommodate a population of 71,100 should not need more houses. However this is not the case due to a decrease in the number of people occupying each house. Changes in marriage and divorce patterns and an ageing population all contribute to an extra need for dwellings. Whereas the UDP projection sought to provide for an average household size of 2.44 by 2011, the WG 2006 projection identifies that the average household size will decrease from 2.25 in 2006 to 2.03 by 2021 (WAG 2008 – Stats Wales). This creates a need for more houses to support a smaller population.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the

Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: SP1 Northern Strategy Area – Sustainable Growth and Regeneration (Paragraphs 6.1- 6.14)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.205	Countryside Council for Wales (CCW)	Unsound (C2, CE1)	Paragraph 6.6 has an emphasis on regeneration and growth with no reference to the environment. Given the site accommodates 2 SINC's these should be a positive benefit to residents and employees at the site.
10D.206	Countryside Council for Wales (CCW)	Unsound (C2, CE1)	Given extent of natural environment interests in the area and objective to protect and enhance the environment in the Plan's vision, concerns expressed that Policy SP1 includes no criterion to protect and enhance the area's natural environment.
19D.92	DPP for Newbridge Construction (DPP)	Sound	Specific reference to the 'town centre' should be deleted from criterion b) as it conflicts with criterion c), text at paragraph 6.4 and 6.5 and the overall strategic vision for Ebbw Vale.
21D.84	GVA for Lewis Engineering Ltd/ TATA Steel UK Ltd (GVA)	Sound	Support for policy and in particular the focus within this policy on delivering strategic sustainable regeneration flagship scheme at Ebbw Vale Northern Corridor under criterion c.
83D.116	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	Questions how many long-term jobs will be created at 'The Works' and how the hub approach to employment will impact on other towns. Considers that it will lead to a division within communities in Blaenau Gwent.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C1	It is a land use plan which has regard to other relevant plans,

	policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Need for criterion on the natural environment (CCW)
- Emphasis on regeneration and growth with no reference to the environment in paragraph 6.6 (CCW)
- Reference to the town centre in criterion b conflicts with criterion c (DPP)
- Supports Policy SP1 criterion c and paragraph 6.6 (GVA)
- Questions impact of hub approach (Mr A Thomas)

Desired Changes to LDP

- To meet C2 and CE1 it is recommended that a criterion similar to that in 'SP2 (f)' is included in 'SP1' (CCW)
- To meet tests C2 and CE1 reference should be made in the text of the paragraph to the natural environment and SINC's (CCW)
- Amend criterion b to read:
Promoting Ebbw Vale as the principal hub for Blaenau Gwent, where the majority of social and economic growth will be accommodated including major retail expansion, administrative, cultural and leisure developments (DPP)
- Change not clearly stated (Mr A Thomas)

COUNCIL RESPONSE

Council Analysis

- **Need for criterion on the natural environment (CCW)**
Disagree. CCW are concerned with the emphasis on regeneration and growth which they consider gives the perception that the plan is all about development rather than sustainability. This is not the case as all of the strategic policies contribute to the strategy whereas the role of this policy is to express the spatial strategy of the plan. The Plan clearly states that the Local Development Plan must be read as a whole. All policies are interrelated and

must be read together to understand their combined effect. It should also be noted that the title clearly states that the policy aim is sustainable growth and criterion a, refers to the creation of sustainable hubs.

Policy SP10 covers the protection of the natural environment and therefore the Plan is considered to be in accordance with National Policy. The Strategic Policies are considered to have a logical flow from the Vision and Objectives.

- **Emphasis on regeneration and growth with no reference to the environment paragraph 6.6 (CCW)**

Agree. It is accepted that a reference to the environmental benefits the site could offer would reflect the approach taken to 'The Works' and benefit the Plan.

Agree. Amend paragraph 6.6 to add a further sentence as follows:

The site offers opportunities to respond to community needs and integrate environmental aspects for positive benefits.

- **Reference to the town centre in criterion b conflicts with criterion c (DPP)**

Agree. Amend criterion b to read:

Promoting Ebbw Vale as the principal hub for Blaenau Gwent, where the majority of social and economic growth will be accommodated. ~~The town centre will be the main centre for service provision where~~ including major retail expansion, administrative, cultural and leisure developments.

- **Supports Policy SP1 criterion c and paragraph 6.6 (GVA)**
Support welcomed.

- **Questions impact of hub approach (Mr A Thomas)**

Whilst it is accepted that the majority of economic growth will be provided in the Ebbw Vale area, the Council do not agree with the suggested impact. The LDP aim is to spread the benefits of this regeneration across Blaenau Gwent through good sustainable transport links between the hubs. The hub approach aims to bring the towns and communities of Blaenau Gwent closer together – not lead to divisions. The hub approach also provides a mechanism to co-ordinate investment and ensure the benefits of growth and regeneration are shared widely.

The employment strategy for the LDP is set out in Policy SP8 and whilst reference is made to 'The Works' no reference is made to the creation of 3,000 jobs. This figure must reflect the transfer of jobs to the site and jobs provided during the construction phase as well as planned jobs. The LDP is concerned with land needs for new job creation and allocates land to meet the identified need, details of this can be found in the Employment Background Paper.

The strategy has been derived having regard to the national, regional and local policy context, social economic and environmental factors, the availability of land for development and the unique characteristics of the area. The Plan has a coherent strategy from which its policies and allocations

logically flow and is reasonably flexible to enable it to deal with changing circumstances.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy SP1 criteria b is amended as follows:

Promoting Ebbw Vale as the principal hub for Blaenau Gwent, where the majority of social and economic growth will be accommodated. ~~The town centre will be the main centre for service provision where including~~ major retail expansion, administrative, cultural and leisure developments.

That the Council recommend to the Planning Inspector paragraph 6.6 is amended as follows:

The Ebbw Vale Northern Corridor site is allocated for mixed-use including housing, employment and leisure. One of the strengths of the site is its position relative to the Heads of the Valleys Road and its role as a Northern gateway into the centre of Ebbw Vale. Over 70 hectares of land is or will become available over the Plan period part of which is a strategic employment site located in a prime position along the Heads of the Valleys Road. ~~The site offers opportunities to respond to community needs and integrate environmental aspects for positive benefits.~~

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

**Policy: SP2 Southern Strategy Area – Regeneration
(Paragraphs 6.15-6.20)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.207	Countryside Council for Wales (CCW)	Unsound (CE1)	Suggests improved wording for criterion (f) of SP2. It should be amended to read ‘by protecting and enhancing the built heritage and natural environment.
10D.208	Countryside Council for Wales (CCW)	Sound (C2, CE1)	Welcomes the recognition that all new development should protect the environment of the area, and considers that it meets Tests of Soundness C2 and CE1.
82D.385	Six Bells Communities First (SBCF)		There is a lack of recognition of the tourism developments within Six Bells. The development of the hub system within Abertillery should ensure connectivity to support visitors to Six Bells and connectivity throughout Ebbw Fach and Blaenau Gwent.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Criterion f requires a reference to ‘enhancement’ (CCW) • Supports recognition for the protection of the environment in paragraph 6.20 (CCW) • The policy needs to refer to Six Bells tourism opportunity and also support routes and connectivity within Ebbw Fach and throughout Blaenau Gwent as a whole (SBCF)
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Desired Changes to LDP

- Amend criterion f to read 'by protecting and enhancing the built heritage and natural environment' (CCW)
- Reference to Six Bells tourism opportunity and links within Ebbw Fach and the rest of Blaenau Gwent (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Criterion f requires a reference to 'enhancement'** (CCW)
Agree. Amend criterion f to read:
'by protecting *and enhancing* the built heritage and natural environment'
- **Supports recognition for the protection of the environment in paragraph 6.20** (CCW)
Support welcomed.
- **Hub system needs to refer to Six Bells tourism opportunity and also support routes and connectivity within Ebbw Fach and throughout Blaenau Gwent as a whole** (SBCF)
Agree. Whilst a reference to the Six Bells Tourism Strategy would be inappropriate, as the plan aims to limit the number of strategies referred to in the interests of creating a slimmer plan, a reference to the Guardian would be acceptable.
Add a sentence to paragraph 6.17:
The Guardian at Parc Arrael Griffin is already proving to be a popular tourist attraction which Abertillery should look to benefit from.

It would assist the clarity of the Plan if reference were made within criterion a, to connecting Abertillery with its hub area. However, it is considered that there is no need to refer to other parts of Blaenau Gwent as these links are covered by the intention of connecting the area with Ebbw Vale and the wider region.
Amend criterion a to read:
Ensuring that the district hub of Abertillery is well connected *with its hub area*, Ebbw Vale and the wider region through...

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy SP2 be amended as follows:

Proposals in the Southern Strategy Area will be required to regenerate the area by: -

- a. Ensuring that the district hub of Abertillery is well connected *with it's hub area,* to Ebbw Vale and the wider region through safe, frequent and reliable public transport links;
- b. Supporting Abertillery District Town Centre in developing complementary roles around culture, leisure and tourism;
- c. Delivering 'Activity Tourism' opportunities in the area;
- d. Ensuring the removal of dereliction by promoting the reuse of under used and derelict land and buildings;
- e. Delivering regeneration schemes which provide residential development and infrastructure; and
- f. Building on the unique identity of the area by protecting *and enhancing* the built heritage and the natural environment.

That the Council recommend to the Planning Inspector that paragraph 6.17 be amended as follows:

Abertillery District Town Centre will explore opportunities to develop complementary roles around leisure and tourism. *The Guardian at Parc Arrael Griffin is already proving to be a popular tourist attraction which Abertillery should look to benefit from.* One of the strengths of Abertillery District Town Centre is the position of the centre relative to woodland and upland landscapes. There are opportunities to develop new infrastructure to enable people to use these environments and to explore the scope for mountain biking as a way of 'opening up' the natural setting of the town. The recent refurbishment of the Metropole and investment in the town centre will enhance the cultural role of Abertillery, in terms of the arts and entertainment. The cultural role has already been enhanced in the southern strategy area through the restoration of Llanhilleth Institute, which was part of an overall regeneration package.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: SP3 The Retail Hierarchy and Vitality and Viability of the Town Centres (Paragraphs 6.21-6.29)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.154	Welsh Government (WG)		Part 2b of the policy says that opportunities to improve the retail offer will be explored; this implies a procedural action rather than land-use policy.
10D.209	Countryside Council for Wales (CCW)	Sound (CE1)	Supports Policy SP3.
15D.361	Mr N Morris		Comments that the area needs investment in its town centres.
16D.376	Cllr John Morgan acting for Tredegar Town Council (Cllr J Morgan)	Unsound	Comments that town centres should be maintained, improved, conserved and protected and that measures should be implemented to promote and protect traders.
21D.338	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Unsound (CE4)	Policy SP3 should be proactive in providing policy support to facilitate the future delivery of additional neighbourhood retail provision within such strategic growth locations such as Ebbw Vale Northern Corridor.
41D.346	DTZ for Questedge Ltd (DTZ)	Unsound (CE2, CE4)	The Council should ensure that appropriate development is delivered to the identified centres to support their roles and support their growth.
41D.347	DTZ for Questedge Ltd (DTZ)		Supports the aim of Policy SP3 in particular the inclusion of Blaina as a local shopping centre.
47D.370	Nantyglo & Blaina Town Council (NBTC)	Unsound (C4, CE1)	Objects to the retail hierarchy which reduces the status of Nantyglo and Blaina to a local town centre.
47D.372	Nantyglo & Blaina Town Council (NBTC)	Unsound (C4, CE1)	Objects to Brynmawr town centre's position as a district town centre in the retail hierarchy.
83D.115	Mr A Thomas	Unsound	Objects to Ebbw Vale performing

		(C1, CE1, CE2, CE4)	a regional retail role and the impact it will have on other town centres particularly Abertillery, Blaina and Brynmawr.
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Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:		
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.	
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).	
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.	
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.	
CE4	It is reasonably flexible to enable it to deal with changing circumstances.	

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Criterion 2b of the policy implies a procedural action and not a land use policy (WG)
- Supports Policy SP3 (CCW) (DTZ)
- Comments that the area needs investment in its town centres (Mr N Morris)
- Comments that town centres should be maintained, improved, conserved and protected (Cllr J Morgan)
- Criterion 1d should be proactive and provide for future neighbouring retail needs (GVA)
- Ensure appropriate development is delivered to the identified centres (DTZ)
- Objects to Blaina's position in the retail hierarchy as a local town centre (NBTC)
- Objects to Brynmawr's position in the retail hierarchy (NBTC)
- Objects to Ebbw Vale performing a regional retail role and its impact on the other towns (Mr A Thomas)

Desired Changes to LDP

- Provide clarity to criterion 2b to ensure the policy is land use related (WG)
- The change is not clearly stated (Mr N Morris)
- The change is not clearly stated (Cllr J Morgan)
- To meet test of soundness CE4 criterion 1d should be amended to read: “Local shops in neighbourhood centres will be protected to meet every day local shopping needs. Additional local shops to serve the strategic growth areas of Ebbw Vale will also be supported” (GVA)
- The change is not clearly stated (DTZ)
- Amend the retail hierarchy to identify Blaina as a district centre (NBTC)
- The change is not clearly stated (NBTC)
- The change is not clearly stated (Mr A Thomas)

COUNCIL RESPONSE

Council Analysis

- **Criterion 2b of the policy implies a procedural action and not a land use policy** (WG)

Agree. Amend criterion 2b of policy SP3 to read:

Opportunities to improve the retail offer will be ~~explored~~ *implemented*

- **Supports Policy SP3** (CCW) (DTZ)

Support welcomed.

- **Comments that the area needs investment in its town centres** (Mr N Morris)

Disagree. The revitalisation of Blaenau Gwent’s town centres is an important priority of the Council. This is reflected in policy SP3 which aims to deliver thriving town centres and protect local shopping facilities.

There are town centre action plans in place for the principal and district town centres, which identify regeneration schemes. A Regeneration Action Plan covers Blaina Local Town Centre. There are also Holistic Regeneration Plans (HARPS) for each of the hub areas.

In 2010-11, Blaenau Gwent Council secured £12.2 million to revitalise Ebbw Vale Town Centre and create an attractive hub for visitors and local people. £13 million for the regeneration of Abertillery town centre has also been secured. The spending programme for both towns will be implemented by 2015.

Blaenau Gwent in association with the Welsh Government Heads of the Valleys Programme has also carried out a number of regeneration projects in the Brynmawr area. These schemes have included; Market Hall Cinema, Commercial Improvement Grants, Hafod Arch improvement and Brynmawr RFC. The Council is also seeking funding to implement a number of schemes for the Brynmawr area in the near future, these include: Brynmawr Bus

Station, Commercial Improvement Grants and the development of the former Welsh school site.

Over the past decade, £15 million of regeneration has been spent in Tredegar town centre. Currently there is a project underway to renovate Bedwellty House and Park. A Strategy and Action Plan is also being prepared for Tredegar and the HoV road corridor which will form the basis of a bid for Heritage Lottery Funding and the next round of European Funding expected in 2013-14.

Blaina town centre has also seen improvements in the establishment of a Chartist Information and Exhibition Centre at Salem Chapel.

- **Comments that town centres should be maintained, improved, conserved and protected** (Cllr J Morgan)

The revitalisation of Blaenau Gwent's town centres is an important priority of the Council. This is reflected in policy SP3 which aims to deliver thriving town centres and protect local shopping facilities.

The Local Development Plan concentrates on land use related issues. Part two of this Strategic Policy identifies land use related measures to improve the vitality and viability of the town centres.

There are town centre action plans in place for the principal and district town centres, which identify regeneration schemes. A Regeneration Action Plan covers Blaina Local Town Centre.

Whilst this plan recognises the issues and provides land to deal with them there are other Strategies such as the Community Plan (Making a Difference – A Community Strategy for Blaenau Gwent (2010-2030)), and the Regeneration Strategy all working to create a better place to live, work and visit.

- **Criterion 1d should be proactive and provide for future neighbouring retail needs** (GVA)

Disagree. Policy SP3 is a strategic policy seeking to establish a retail hierarchy in order to meet future retail needs in a co-ordinated and sustainable manner. Policies MU1 and MU2 deal with the strategic growth areas in Ebbw Vale, both of which are supported by Masterplans which assess the development potential of the areas and identify key elements.

- **Ensure appropriate development is delivered to the identified centres** (DTZ)

Agree. The selection of allocations was undertaken through a rigorous assessment process which assessed not only the developability of the site but also to ensure that the site is in accordance with the LDP strategy. One of the key elements of the LDP strategy is to ensure that appropriate development is delivered to the identified hubs which in turn support the role and growth of the town centre in that hub. **No change required.**

- **Objects to Blaina's position in the retail hierarchy as a local town**

centre (NBTC)

Disagree. The Retailing Background Paper explains the rationale behind the formulation of the retail hierarchy. The Paper provides the criteria used to define a district town centre and a local town centre based on definitions in Planning Policy Wales and Planning Policy Statement 6 (ODPM, 2005). The definitions are not totally distinct and are based on size and the types of facilities within a centre.

Data from the annual town centre health checks was used to assist with the defining of the retail hierarchy particularly with regard to the number of units within the town centre boundary and the percentage of different types of uses. The data for the Principal and District Town Centres clearly reflect the larger town centres, with the number of ground floor units within the town centre boundary being 139 units or more. Blaina Local Town Centre is half the size with only 64 units within the town centre boundary. So in terms of size meets the requirements of a local town centre.

There are clear distinctions between the different types of uses operating between the identified Principal and District town centres to that of Blaina Local Town Centre. For example all of the Principal and District Town Centres have at least two banks and building societies operating, a library and national multiple retailers. However, Blaina has no banks or building societies, the library is located on the edge of town, there are no national multiple retailers instead the shopping experience is one of convenience and day to day shopping. The weekly average footfall movement is also considerably lower in Blaina with approximately 6,000 movements. This compares to 14,000 in Brynmawr and 10,000 in Tredegar.

It is also worth reflecting that policy SP3 does not pay less regard to centres identified as local town centres. Local town centres are recognised as forming an important part of Blaenau Gwent's retail hierarchy and of its social, economic and physical fabric.

• **Objects to Brynmawr's position in the retail Hierarchy (NBTC)**

Objector contends that the criteria used to define a District Shopping Centre in the Local Development Plan can only be applied to Lakeside Retail Park. Brynmawr town centre has no more of a claim to be a District Town Centre than that of the central shopping area of Blaina.

Disagree. A key theme of the Plan is to deliver thriving town centres and protect local shopping facilities as town centres form an important part of Blaenau Gwent's social, economic and physical fabric. Therefore in order to meet future retail needs in a co-ordinated and sustainable manner a retail hierarchy of town and local shopping centres has been established.

The Retailing Background Paper explains the rationale behind the formulation of the retail hierarchy. Lakeside Retail Park does not fit within this rationale. The Retail Park is an edge of centre retail development that comprises of 7 retail units. The retail units are national retailers, 6 of which are comparison and the remainder is a convenience store. This does not meet the definition of a district centre, as a district centre should also comprise of non-retail uses and public facilities.

Brynmawr town centre clearly fits the criteria of a district centre as set out in the Retailing Background Paper. Brynmawr has 91 more retail units than Blaina, a higher level of weekly average footfall (8,000 movements more) and a range of shops, non retail uses and public facilities such as a library and cinema.

- **Objects to Ebbw Vale performing a regional retail role and its impact on the other towns** (Mr A Thomas)

The objector also questions where new businesses will relocate and that shops are closing in Abertillery even though £13 million is being invested.

Disagree. The Local Development Plan strategy is based on regenerating the area through the hub and spoke approach i.e. building a network of district hubs around the principal hub of Ebbw Vale. The creation of an integrated network of modern and revitalised hubs provides a mechanism to co-ordinate investment and ensures the benefits of growth and regeneration are shared widely to transform the whole of Blaenau Gwent.

Notwithstanding this, there remains an emphasis in terms of development in Ebbw Vale. This reflects the Wales Spatial Plan's identification of Ebbw Vale as a key settlement that has a critical role to play in the success of the Capital Region.

The revitalisation of Blaenau Gwent's town centres is an important priority of the Council. There are town centre action plans in place for the principal and district town centres, which identify regeneration schemes. There are also Holistic Regeneration Plans (HARPS) for each of the hub areas.

A key challenge for the Local Development Plan was that the town centres compete against each other and have no clear roles. Strategic policies 1 and 2 of the Deposit Plan identify new roles for the town centres.

Drawing upon these roles, the town centre managers have recently undertaken occupier reports and a marketing and branding exercise for each of the town centres. This will establish an accurate picture of the potential investors that could be attracted to the county boroughs town centres; and target and attract increased retail/mixed use/other investment to the town centres utilising a professional and consistent promotion method.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that criterion 2b of policy SP3 be amended to read:

Opportunities to improve the retail offer will be ~~explored~~ *implemented*

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: SP4 Delivering Quality Housing (Paragraphs 6.30-6.34)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.127	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Deliverability of housing within the plan period should be a matter that is considered at examination.
3D.129	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Need to make clear if the Plan deals with backlog and current need over the plan period. Also needs to make it clear if it has taken into account impact of private rental sector as this sector can also be affordable.
3D.131	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The policy should only identify the target for delivery through the planning system with the broader total being deleted.
3D.132	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The plan's target should be based on an ambition to maximise delivery of affordable housing through the planning system. The policy is insufficiently flexible to promote a higher level of provision.
3D.134	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The plan needs to be clear about the sources of affordable housing: what estimate is made for sites which don't fall neatly into multiples of 10; contribution of windfall and small sites; a contribution from affordable exception sites; and a statement on commitments.
3D.138	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Several matters relating to the Gypsy & Traveller Housing Needs Assessment: Whether it used the wider Gypsy and Traveller definition; Whether the need is appropriate for the plan period; Implications of assessment not being based on WG guidance.

3D.146	Welsh Government (WG)	Unsound (CE2, CE3, CE4)	Requires clarification of the relationship between the WG 2006 and WG 2008 based projections within the LDP.
10D.210	Countryside Council for Wales (CCW)	Unsound (CE2)	Concerns regarding the proposed level of housing provision and its delivery during the plan period. Annual average completion rate from 1980 - 2009 was 140 units but 244 units required per annum to meet target of 3,666 houses for LDP period
15D.357	Mr N Morris		Questions the need for further housing sites in Brynmawr when permission is yet to be granted on Anacomp UK and Factory Road site. The demolition of other sites in this area should not take place until planning permission has been granted.
15D.360	Mr N Morris		Objects to the allocation of housing sites. The focus should be on ensuring that measures are being taken to provide work in the area. If investment is not made in the future of the people, there will be no people to live in the houses.
16D.101	Cllr John Morgan acting for Tredegar Town Council (Cllr J Morgan)	Unsound	A housing ladder should be implemented to allow all to meet their aspirations. BG's average owner occupation is 62% against 71% for Wales. A policy needs to be introduced to close the gap and raise owner occupation within the borough.
20D.367	Public Health Wales (PHW)	Sound	In terms of planned residential developments, it is important to liaise with Aneurin Bevan Health Board at an early stage regarding the potential effects on primary care services.
24D.104	Home Builders Federation (HBF)	Unsound (CE2, CE3)	Supports the high level of growth but objects to reduction in the household requirement from 4,082 to 3,666 to accommodate a lower vacancy rate.
41D.105	DTZ for Questedge Ltd (DTZ)	Unsound (CE2,	Supports the high level of Housing but asks that the 3,666

		CE4)	target is not a ceiling and that provided any development is demonstrated to be sustainable, accessible and viable, housing above the target should be accepted.
62D.189	Caerphilly County Borough Council (CCBC)	Sound	Blaenau Gwent are fulfilling the scale of growth apportioned to it through the SEWSPG Apportionment exercise

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Deliverability of housing sites in light of past build rates (WG) (CCW) • Clarity required on affordable housing need (WG) • Only identify the affordable housing to be delivered through S106 Agreements (WG) • Policy insufficiently flexible to promote a higher provision of affordable housing (WG) • Clarity on the sources of affordable housing within the plan (WG) • Issues regarding the Gypsy & Traveller Housing Needs Assessment (WG) • Clarity required on relationship between the WG 2006 and WG 2008 based projections (WG) • Demolition of buildings when sites remain vacant (Mr N Morris) • Allocation of housing sites when the focus should be on providing work for the area (Mr N Morris) • A housing ladder should be implemented to allow all to meet their aspirations (Cllr J Morgan) • Consultation needed on the potential effects on primary care services (PHW) • The calculation made to translate the housing requirement to a household requirement and in particular the reduction of the vacancy rate to 4% at the

end of the plan period (HBF)

- Housing figure to be a ceiling and Plan should enable development of sites that can be demonstrated to be accessible and sustainable (DTZ)
- Support for Blaenau Gwent fulfilling the scale of growth apportioned to it through the SEWSPG Apportionment exercise (CCBC)

Desired Changes to LDP

- Change not clearly stated (WG) (CCW)
- Clarify sources of affordable housing need (WG)
- Delete the broader total of affordable housing from the policy (WG)
- Redraft policy to refer to **at least** 327 units (WG)
- Clarity required on sources of contributions for affordable housing target (WG)
- Change not clearly stated (WG)
- Clarity on the relationship between the 2006 and 2008 WG based projections in the text (WG)
- Don't demolish buildings until planning permission granted on existing vacant sites (Mr N Morris)
- Jobs required rather than houses (Mr N Morris)
- A policy needs to be introduced to close the gap and raise owner occupation within the borough (Cllr J Morgan)
- Changes not clearly stated (PHW)
- The dwelling requirement be changed to 4,330 dwellings (HBF)
- The housing requirement should not be a ceiling, it must be clear that any new sites should be considered favourably where they would deliver housing development in accessible and sustainable locations (DTZ)

COUNCIL RESPONSE

Council Analysis

- **Deliverability of housing sites in light of past build rates** (WG) (CCW)
WG support the growth aspiration of the LDP but consider that the deliverability of housing within the plan period should be a matter considered at examination. WG note the good mix of sites and reasonable degree of confidence in delivery with the major funding sources outlined in chapter 9 and with progress of masterplanning of key strategic sites.

The key issues requiring further clarification is the ability to deliver the scale of development proposed when compared to past build rates particularly in light of the housing market being less buoyant than some neighbouring authorities. WG are not criticising the positive approach, albeit seeking to ensure that the plan is deliverable in broad terms.

WG and CCW note that the proposed build rate has only been achieved 4 times since the 1980's. WG also note the phased delivery and the importance of the planned large strategic sites successfully coming forward.

It is accepted that the housing level is challenging but unless the Council plans to meet these higher levels the area will continue to decline. It should be noted that until 2006 the area had seen very little in the way of completions from RSLs, this picture has now changed and RSL's are now more active in the area. If this trend continues and private sector housing completions reaches former levels then the area should see a marked increase in completions.

Another point to note is that the higher completion figures were achieved when the Council released the former Garden Festival site in the 1980's; the release of 'The Works Site' should have a similar impact on housing completion rates. Large tracts of remediated land at 'The Works' are ready to be released on a phased basis. The other major source of completions is from the Ebbw Vale North site where some parcels are already at pre-application discussion stage.

If the Council does not aim for the higher figure then it will be planning to fail in terms of addressing the declining population and its associated problems. The Plan has had regard to national policy in setting the overall housing requirement, the officers have worked with neighbouring authorities, and the figure is considered to be deliverable.

- **Clarity required on affordable housing need (WG)**

Agree. For clarity add the following two sentences to paragraph 6.32

This figure deals with the backlog, current and anticipated need over the Plan period. The level of need has also taken account of any impact of the private rental sector given that this sector could be affordable to some who could not afford to buy or obtain a mortgage on market housing.

- **Only identify the affordable housing to be delivered through S106 Agreements (WG)**

Agree. Amend criterion 2.a to read:

A mix of dwelling types, sizes and tenure, including 327 affordable *dwelling*s will be delivered through the planning system to meet the needs of Blaenau Gwent's current and future population.

- **Policy insufficiently flexible to promote a higher provision of affordable housing (WG)**

Agree. Add the words 'at least' before 327 in criterion 2a as amended above:

A mix of dwelling types, sizes and tenure, including *at least* 327 affordable dwelling>s will be delivered through the planning system to meet the needs of Blaenau Gwent's current and future population.

- **Clarity on the sources of affordable housing within the plan (WG)**

The plan needs to be clear about the sources of affordable housing: what estimate is made for sites which don't fall neatly into multiples of 10;

contribution of windfall and small sites; a contribution from affordable exception sites; and a statement on commitments.

Agree. It is considered appropriate to address this issue, however the detail of the breakdown of the figure is more appropriately located in the Affordable Housing Background Paper. The Paper will be amended to identify a contribution from sites which don't fall neatly into multiples of 10 and what contribution is to be made for affordable exception sites, and will include a statement on commitments.

However, no contribution is to be identified on sites under 10 units due to the threshold being identified as 10 units. The reasons for this are two fold, firstly due to viability and the fact that financial contributions could restrict some sites coming forward for development. Secondly, the contribution from the 5-9 bracket would not achieve many new affordable homes. Further information on this can be found in the Background Paper at paragraphs 3.13-3.16.

It is suggested that the paragraphs 6.32 and 6.33 are amended to clarify the position.

Amend objective 3 to reflect the new wider affordable housing figure of 1,000.

Amend criterion 2a to read:

A mix of dwelling types, sizes and tenure, including 335 affordable dwellings will be delivered through the planning system to meet the needs of Blaenau Gwent's current and future population.

Amend paragraph 6.32 to read:

.....The Plan is therefore able to deliver 335 new affordable dwellings, through the use of planning obligations on qualifying sites and *based on an estimate of the number of affordable housing exception dwellings coming forward over the Plan period.*

Replace paragraph 6.33 with:

The target of at least 335 units delivered through the planning system forms part of a wider total of 1,000 affordable housing units which it is estimated could be provided using all other delivery mechanisms. Further information in respect of these figure is contained in the Affordable Housing Background Paper (2011). Guidance in relation to the provision of affordable housing is contained in the Supplementary Planning Guidance on Planning Obligations.

- **Issues regarding the Gypsy & Traveller Housing Needs Assessment (WG)**

The first issue raised is with the definition used by the Blaenau Gwent Study and the WG Circular 30/2007. It is considered that the definition used in the study is sufficiently similar to ensure the right groups have been catered for. The only difference between the definitions relates to 'whatever their race or origin' and the exclusion of organised groups of travelling show people or circus people travelling together as such'. The study did not exclude groups by race or origin and did not consider travelling show people or circus groups. The second issue is the extent to which the consultation undertaken accords

with the WG Circular. The Circular requires Ipa's to discuss directly with the Gypsies and Travellers themselves, their representative bodies and local support. The Gypsy and Travellers Assessment identifies that written consultation was undertaken with stakeholders working with Gypsies and Travellers in the Study Area and that there were structured interviews with Gypsy and Traveller families on the Cwmcraehen site and families in local housing. The LDP consultation also involved written consultation with the Gypsy Traveller Law Reform Coalition, Equality & Human Rights Commission and Valleys Race Equality Council. The Development Plans Manager has also met with the Blaenau Gwent's liaison officer, the Site Manager and a lead member of the Cwmcraehen community.

The Gypsy & Travellers Assessment identified the site to be included in the Plan through consultation with the Gypsy and Traveller Community.

A further issue is with the need beyond 2011 which was not addressed in the study. This has been addressed through an update to the study. This will be made available as part of the evidence base and the Affordable Housing Background Paper will also be updated to reflect the findings of this study. The update identifies that there is a need for 4 pitches which can be accommodated on the land already identified in the Plan.

The Council does not consider there are significant implications of not using the WG guidance as the study followed the ODPM guidance and addresses the same issues. Further work was also carried out through the Housing Market Assessment undertaken with Torfaen and Monmouthshire County Borough Councils. This was not made available as a supporting document at the time the Plan was placed on deposit but will now be made available.

It is recommended that Policy SP4 and paragraph 6.34 be amended to reflect the need for 4 pitches rather than 6 and the date of the assessment is amended to reflect the 2011 study date. This change also needs to be reflected in Policy GT1, paragraph 8.31 and the monitoring table.

- **Clarity required on relationship between the WG 2006 and WG 2008 based projections (WG)**

Agree. It is agreed to provide more clarity in the Plan by identifying one figure rather than referring to two separate projection figures. WG consider that an appropriate approach would be to identify a more rounded figure for ease of reference. Based on the 2008 WG projections it is suggested that the housing requirement figure is changed to 3,500, the population figure at 2006 is changed to 68,914 and the population figure at 2021 is amended to 70,894.

It is recommended that Policy SP4 criterion 1a, objectives 2 and 3, paragraph 5.5, paragraph 6.30 and Policy SP5 criterion c are amended to reflect the figures of 68,914 in 2006, 70894 in 2021 and a housing requirement figure of 3,500.

- **Demolition of buildings when sites remain vacant (Mr N Morris)**

Disagree. The Plan is a 15 year plan which needs to look at long-term requirements for the area not the short term picture. Both sites mentioned by the objector are subject to planning applications. The Factory Road Site has

recently (August 2011) been granted permission on appeal and work at this site should commence shortly. The Annacomp UK site is a Brecon Beacons National Park Authority application and is awaiting the signing of a Section 106 legal agreement (Oct 2011).

- **Allocation of housing sites when the focus should be on providing work for the area (Mr N Morris)**

Disagree. The plan addresses both housing and employment needs of the area. Policy SP8 sets out the Council's approach to employment and this is further supported by the Employment Background Paper. The Council has taken into account growth in the working age population and the aim to reduce unemployment in identifying future employment requirements. Whilst this plan recognises the issues and provides land to deal with them, there are other Strategies such as: the Community Plan (Making a Difference – A Community Strategy for Blaenau Gwent (2010-2030); The Health, Social Care and Well-Being Strategy; Community Safety Plan; Children and Young People's Plan; and Regeneration Strategy all working to improve the life of residents of Blaenau Gwent.

- **A housing ladder should be implemented to allow all to meet their aspirations (Cllr J Morgan)**

Disagree. Whilst this policy refers to providing affordable housing the detail of the provision of affordable housing is set out in Policy DM8. The reasoned justification of the policy explains that affordable housing includes Social Rented Housing, and Intermediate Housing. Social Rented Properties are tenure neutral which enables people to purchase the property if their circumstances change. People are also able to staircase up to full ownership in the intermediate affordable properties for sale. More detail on this is provided in the Planning Obligations Supplementary Planning Guidance (2011). Thus a housing ladder is already in place to meet aspirations. It is not considered appropriate to include an aspiration to increase home ownership, as the approach of the National Housing Strategy is to provide more housing of the right type and offer more choice (PPW Edition 4 Para 9.1.1).

- **Consultation needed on the potential effects on primary care services (PHW)**

Noted. The Council recognise the importance of ensuring that appropriate healthcare facilities are provided throughout Blaenau Gwent. In recognition of this need the Council has been working with the Health Authority in identifying sites for Primary Care Resource Centres. The Community Facilities Background Paper provides information on the latest position on this. The Aneurin Bevan Local Health Board has played an active part in preparing the Plan through participation at workshops, commenting on the Plan and undertaking a Health Impact Assessment.

In addition, the process of preparing development briefs for the mixed use sites will further allow the Council the opportunity to discuss requirements with the Health Authority.

- **Calculation made to translate the housing requirement to a**

household requirement and in particular the reduction of the vacancy rate to 4% at the end of the plan period (HBF)

Disagree. The problem with vacant properties was an issue raised through consultation on the Preferred Strategy and at exhibitions held on the Deposit Plan. Residents questioned the need for new dwellings given the number of vacant properties in existence. The aim to reduce the vacancy rate to 4%, which is the percentage considered to be an acceptable level to allow movement within the market, is considered to be reasonable and achievable. In the late 1990's Blaenau Gwent was an area of low market demand which had a high level of vacant properties, houses were on the market for long periods of time before they were sold. This all changed in 2003 when property prices started to increase and the number of sales increased. The increase in the cost of houses made vacant properties more cost effective to buy and repair. In addition the Council has high void levels in its Council housing stock, again this will reduce when improvements required to meet the WHQS are completed. Whilst there are a number of difficult vacant properties in the Borough the Empty Property Strategy is working to reduce this number. In light of all this it is considered reasonable to calculate a 4% vacancy rate at the end of the plan period.

The HBF fail to understand that there are already 1,831 empty dwellings (5.7% of 32,126) available to be brought back into use. The Council is aiming to reduce this number to 1,381 (4% of 35,632) by the end of the plan period. The Council suggests that some of these are already being utilised to address the shortfall in houses built from 2006-2011. If as the HBF suggests the completion rate never reaches the levels anticipated this could arguably result in a lower vacancy rate.

- **Housing figure to be a ceiling and Plan should enable development of sites that can be demonstrated to be accessible and sustainable (DTZ)**

Disagree. PPW (Edition 4) makes it clear that LDPs should provide a firm basis for rational and consistent decisions on planning applications and appeals. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.

The objector is requiring a statement which would undermine the whole basis of the plan led system. The Plan provides sites to meet the housing requirement figure and there is a review process which would enable sites to be added if the figure proved to be too low. The plan also allows for windfall sites to come forward and sets the framework for decisions to be made on such sites. It is considered that the Plan is reasonably flexible to enable it to deal with changing circumstances.

- **Support for Blaenau Gwent fulfilling the scale of growth apportioned to it through the SEWSPG Apportionment exercise (CCBC)**
Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy SP4 criterion 1a be amended to read as follows:

1. To stem out-migration and attract people to the area:

- a. Provision ~~will be~~ **is** made for the development of ~~3,666~~ **3,932** new dwellings *in order to deliver the 3,500 new dwellings required to increase the ~~of~~ population to ~~71,100~~ **70,849** ~~in by~~ 2021;*

This change also needs to be reflected in objective 2 and 3 as follows:

Objective 2

By 2021, the population will have increased from ~~69,300~~ **68,914** to ~~71,100~~ **70,849** as a result of natural change and people being attracted to the area. The overall population structure will be generally in line with that of Wales.

Objective 3

By 2021, ~~3,666~~ **3,500** new houses will have been built, approximately ~~800~~ **1,000** of which will be affordable. New housing sites alongside improvements to existing houses will have helped create sustainable communities.

This change also needs to be reflected in the first two sentences of paragraph 5.5 as follows:

A key challenge for the area is to halt the declining population. A major part of this Strategy is to enable the growth in population from ~~69,300~~ **68,914** to ~~71,100~~ **70,849**. To accommodate this growth ~~3,500~~ **3,500** new houses will be required between 2006-2021.

This change also needs to be reflected in paragraph 6.30 as follows:

The LDP provides a framework for the development of ~~3,500~~ **3,500** new dwellings in Blaenau Gwent over the Plan period. The construction and distribution of this number of dwellings will assist in halting the process of depopulation and ensure a stable level of growth in the future. According to the WAG 2008 population projection the population is estimated to rise from ~~69,300~~ **68,914** in 2006 to ~~71,100~~ **70,849** in 2021. The *corresponding* WAG household projection identifies that ~~3,925~~ **3,925** households will be required to meet this growth in population. *The housing requirement figure* has been translated to a dwelling requirement of ~~3,500~~ **3,500** due to the need to reduce the vacancy rate from 5.7% to 4% over the Plan period. *To provide sufficient land to accommodate the projected growth, the LDP makes provision for the construction of 3,925 dwellings. This represents 432 (12%) units more than the requirement figure of 3,500, to allow for choice and flexibility. Full details of these calculations are provided in the Population and Housing Background Paper.*

This change also needs to be reflected in the deletion of paragraph 6.35. This change also needs to be reflected in Policy SP5 criterion c as follows:

- c. The delivery of the housing requirement figure will be increased in five-year periods recognising the step change required to reach the higher completion figures.

2006-2011	820700
2011-2016	1,320 1,300
2016-2021	1,526 1,500

This change also needs to be reflected in the monitoring table.

That the Council recommend to the Planning Inspector that Policy SP4 criterion 2a be amended to read as follows:

A mix of dwelling types, sizes and tenure, *including at least 335 affordable dwellings will be delivered to meet the needs of Blaenau Gwent's current and future population including approximately 800 units of affordable and special needs housing will be delivered to meet the needs of Blaenau Gwent's current and future population (327 of which will be delivered through S106 Agreements)* and:

That the Council recommend to the Planning Inspector that Paragraph 6.32 be amended as follows:

Of major importance to the Strategy is the delivery of sustainable linked communities. To create sustainable communities, developments must include a mix of dwelling types, sizes and tenure, including new affordable dwellings. The Local Housing Market Assessment (2006) identifies that 86 units per annum need to be provided which equates to 1,290 over the Plan period. *This figure deals with the backlog, current and anticipated need over the Plan period. The level of need has also taken account of any impact of the private rental sector given that this sector could be affordable to some who could not afford to buy or obtain a mortgage on market housing.* The Affordable Housing Viability Study (2010) identifies that housing sites can deliver 10% affordable units without social housing grant. The Plan is therefore able to deliver ~~327~~ 335 new affordable dwellings, *through the use of planning obligations on qualifying sites and through S106 agreements based on an estimate of the number of affordable housing exception dwellings coming forward over the Plan period. The Council will explore opportunities to maximise the provision of affordable housing in respect of both social rented and low cost housing for sale.*

That the Council recommend to the Planning Inspector that Paragraph 6.33 be replaced as follows:

The target of at least 335 units delivered through the planning system forms part of a wider total of 1,000 affordable housing units which it is estimated could be provided using all other delivery mechanisms. Further information in respect of these figures is contained in the Affordable Housing Background Paper (2011). Guidance in relation to the provision of affordable housing is contained in the Supplementary Planning Guidance on Planning Obligations.

A total of 436 affordable units are already identified in the Plan for delivery through social housing grant and a further 38 have already been delivered. This brings the overall total to 801 affordable units which is over 20% of the total dwellings identified to be provided during the Plan period. The Council in partnership with Registered Social Landlords will seek to provide the remainder of the affordable housing requirement by bringing existing underused stock back into use and through the continued operation of social housing grant. The Council also recognises that securing affordable housing must be carefully balanced against other policy requirements in the Plan. Supplementary Planning Guidance on Planning Obligations provides the detail of how this will be achieved.

That the Council recommend to the Planning Inspector that Policy SP4 criterion 2b be amended to read as follows:

Provision will be made for 64 pitches for unmet gypsy and traveller accommodation.

That the Council recommend to the Planning Inspector that Paragraph 6.34 be replaced as follows:

The Blaenau Gwent Gypsy & Traveller Housing Needs Assessment (June September 200711) identifies the need for a further 64 pitches in Blaenau Gwent.

This change also needs to be reflected in Policy GT1, paragraph 8.31 and the monitoring table.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: SP5 Spatial Distribution of Housing (Paragraphs 6.35-6.37)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.405	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Understanding of how phasing will be reflected within the four hub areas as well as how it will be used to manage development over the plan period.
17D.165	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	The absence of housing sites with planning permission in the north east of Ebbw Vale and the concentration of housing at Ebbw Vale Northern corridor fails to provide an appropriate range of housing sites to serve the northern part of Ebbw Vale.
21D.89	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Sound	Support the distribution of housing set out in Strategic Policy SP5 and the recognition of the importance of Ebbw Vale in terms of housing delivery over the Plan period.
24D.103	Home Builders Federation (HBF)	Unsound (C2, CE2, CE3, CE4)	Policy SP5 does not provide sufficient flexibility in view of comments on SP4 to raise the housing requirement to 4,330.
24D.485	Home Builders Federation (HBF)	Unsound (C2, CE2, CE3, CE4)	The phasing proposed does not accord with national policy.
24D.486	Home Builders Federation (HBF)	Unsound (C2, CE2, CE3, CE4)	The existing land supply needs to be thoroughly examined.
34D.117	Mrs P Davies	Unsound (P1, P2 C4, CE2, CE3)	Too many houses planned for Tredegar without sufficient infrastructure such as hospital, shopping and Council office.
41D.107	DTZ for Questedge Ltd (DTZ)	Unsound (CE2, CE4)	It is essential that the Council, through policy adopted in the Development Plan, are able to support additional sites outside those identified, which have potential to deliver viable housing development.

83D.109	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	Concern regarding the distribution of sites centred in Ebbw Vale and Tredegar as this could have an effect on the network of district hubs, especially Brynmawr, Blaina and Abertillery resulting in migration of people from this area to Ebbw Vale.
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Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representations are as follows:</p> <ul style="list-style-type: none"> • Phasing of sites in hub areas and how phasing is to be used (WG) • Absence of sites in NE Ebbw Vale (C2J) • Support for distribution of housing sites and importance of Ebbw Vale (GVA) • Insufficient flexibility (HBF) • Phasing does not accord with national policy (HBF) • Land supply needs to be examined (HBF) • Lack of infrastructure to support level of housing in Tredegar (Mrs P Davies) • Support for additional sites outside those identified (DTZ) • Distribution of sites centred on Ebbw Vale and Tredegar (Mr A Thomas)
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Desired Changes to LDP

- Explain in RJ how phasing is reflected in hub areas and how phasing will be used to manage development over the plan period (WG)
- Change not clearly stated (C2J)
- Policy SP5 should provide land to accommodate 4,893 dwellings, in order to allow for choice and flexibility (HBF)
- Delete the phasing mechanism (HBF)
- Change not clearly stated (HBF)
- Change not clearly stated (Mrs P Davies)
- It should be expressed in the Plan that the identified housing requirement is not a ceiling, but is the number of dwellings identified to provide for the anticipated growth in population (DTZ)
- Change not clearly stated (Mr A Thomas)

COUNCIL RESPONSE

Council Analysis

- **Phasing of sites in hub areas and how it will be used to control development (WG)**

WG requests that there is some explanation of how the phasing set out in chapter 9 impacts on the hub areas. Although Chapter 9 of the Plan indicates phasing for sites the introduction makes it clear that this is only indicative and if the situation alters it is acceptable for the development to come forward early. In view of this it is suggested that it would be misleading to include figures within this section. However it is accepted that an explanation should be included on how phasing is to be used.

Agree to include wording identifying how the phasing mechanism is to be used. The following wording will be added to paragraph 6.37:

The figures will be used in the Housing Land Availability Study to identify the 5- year requirement they are not intended to restrict development. The phased delivery figures and the phasing of sites included in Chapter 9 are only indicative and if the situation alters, it is acceptable for developments to come forward early.

- **Absence of sites in NE Ebbw Vale (C2J)**

Disagree. A significant (49%) percentage of development is taking place in Ebbw Vale. The sites included in the Plan have been assessed through the Candidate Site Methodology and are the most sustainable and appropriate sites. The objector is proposing sites in this area which were not part of the Candidate Site Assessment Methodology. However, an assessment of the proposed sites revealed that they performed poorly against the sustainability and LDP objectives when compared to other sites included in the Plan.

- **Support for distribution of housing sites and importance of Ebbw Vale (GVA)**

Support welcomed.

- **Insufficient flexibility (HBF)**

Disagree. In light of the fact the Council disagreed with the proposed increase in the housing requirement figure, in it's response to SP4, there is no need to increase the housing supply by 563 dwellings as suggested by the HBF.

- **Phasing does not accord with national policy (HBF)**

Disagree. The purpose of the numerical figure in this policy isn't to restrict land being brought forward but to ensure that the land supply figure included in the Housing Land Availability study is gradually increased. Paragraph 6.37 makes it clear that the phasing will not change the overall requirement for the Plan period. The figure will only be used in the Housing Land Availability Study to identify the number of years land supply for the authority. The phasing of sites included in chapter 9 accords with PPW as it is based on considerations relating to physical or social infrastructure, or to the adequacy of other services. The introduction of chapter 9 makes it clear that this is only indicative and if the situation alters, it is acceptable for the development to come forward early. In response to a comment from WG a sentence is to be included under paragraph 6.37 to confirm this. This should help clarify the issue for the HBF.

- **Land supply needs to be examined (HBF)**

Disagree. The HBF argue that only 1,100 houses are within the 5 year supply and that 1205 houses are within Category 3(i). The argument is that category 3(i) are sites where "development is unlikely within 5 years by virtue of major physical constraints or other constraints", whilst this may be true of some sites other sites are within this category due to the fact that they cannot be completed within 5 years due to the developers build rate. To address this issue and assist the Inspector a Background Paper is to be prepared setting out a 5-year trajectory.

- **Level of housing development in Tredegar (Mrs P Davies)**

Disagree. Where there is an identified need for infrastructure to support the proposed developments this will be provided by the developers. In terms of existing need for infrastructure the Plan has identified requirements for, community facilities (see Communities Facilities Background Paper), retail need (see Retailing Background Paper). Whilst a need for a new Primary Care Resource Centre has been identified no decision has been made on which site is to be utilised.

It is acknowledged that there is an issue with school numbers in the Tredegar catchment area. The Education department are currently in the process of preparing a School Organisation Plan which will look to address this issue. The Regeneration division will work with education to identify future school sites.

- **Support for additional sites outside those identified (DTZ)**

Disagree. The suggestion that the housing figure should not be a ceiling to stop any additional sites coming forward where they can be demonstrated as appropriate sites for development goes against the plan led system as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. The Plan already allows for windfall development, small sites and rural exception sites to come forward any further concessions would undermine the plan led system.

- **Distribution of sites centred on Ebbw Vale and Tredegar (Mr A Thomas)**

The objector is concerned that the focus of sites in Ebbw Vale and Tredegar will damage the regeneration of Abertillery, Brynmawr and Blaina as people will migrate to these areas. It is accepted that Ebbw Vale and the Tredegar area are taking on a greater percentage of growth; this reflected the distribution of sites submitted through the Candidate Site process and the opportunities offered from large brownfield sites. The Strategy is based on building a network of district hubs around the principal hub of Ebbw Vale, whilst recognising there is a north south divide in terms of opportunities for growth. The Strategy was also informed by national and regional policy guidance which identifies Ebbw Vale as a key settlement and the Heads of the Valleys corridor, in general as having the potential for growth.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Paragraph 6.37 be amended as follows:

In recognition of the step change required to increase the build rate from current low levels it is considered appropriate to increase the requirement figure over five year periods. This will in no way change the overall requirement for the Plan period but enables the transition from the lower UDP figure to the higher LDP requirement. *The figures will be used in the Housing Land Availability Study to identify the 5- year requirement they are not intended to restrict development. The phased delivery figures and the phasing of sites included in Chapter 9 are only indicative and if the situation alters, it is acceptable for developments to come forward early.*

Reason for Recommendation

The proposed change is not substantive but would improve the clarity

of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: SP6 Ensuring Accessibility (Paragraphs 6.38-6.44)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.211	Countryside Council for Wales (CCW)	Sound (CE1)	CCW supports the policy in principle, and considers that it meets Test of Soundness CE1.
20D.365	Public Health Wales (PHW)	Sound	Welcomes the recognition within the Plan of the contribution that the built environment makes to the health of Blaenau Gwent residents. In particular the Plan refers to increasing opportunities for active travel (walking and cycling).
33D.21	Mrs E Brown	Unsound (CE2)	In order to increase walking and cycling as highlighted in Para 6.42, rights of way, and footpaths must be left undisturbed, for example, by developments at Blue Lakes, Bryn Serth and Rhyd-y-Blew.
66D.78	Cllr D Hancock		Requests that the A467 be reinstated as the main road in the strategic highway network.
82D.387	Six Bells Communities First (SBCF)		SP6 needs to recognise the need for appropriate levels of off street parking and signage for the local community and visitors alike to the Guardian.
83D.75	Mr A Thomas	Unsound (CE3, CE4)	The Plan downgrades the A467 as the main arterial route linking the M4 and Brynmawr.
83D.77	Mr A Thomas	Unsound (CE3, CE4)	Transport policy must set out clearly, how highway congestion, speeding, on street parking, drop curbs being used as an extension of the highway and the effects of pollution are going to be addressed.
83D.111	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	The identification of the road hierarchy and core network is gerrymandering and misleading. The Hierarchy Strategic Route is the A467

			Brynmawr to Newport M4 corridor. The LDP deliberately plays down the status from an arterial route to a principal.
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Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for Policy SP6 (CCW) (PHW)
- Rights of Way to be left undisturbed by developments (Mrs E Brown)
- A467 Brynmawr to Newport to be upgraded (Cllr D Hancock) (Mr A Thomas)
- Recognise need for off street parking and signage (SBCF)
- Address highway congestion, speeding, on street parking, drop kerbs and how the effects of pollution are going to be addressed (Mr A Thomas)

Desired Changes to LDP

- Rights of Way to be left undisturbed by developments (Mrs E Brown)
- The road hierarchy map at appendix 6 should be changed to reflect the true status of the of A467 as the arterial route from the M4 Newport to Brynmawr (Cllr D Hancock) (Mr A Thomas)
- Recognise need for off street parking and signage (SBCF)
- Change not clearly stated (Mr A Thomas)

COUNCIL RESPONSE

Council Analysis

- **Support for Policy (CCW) (PHW)**

Support welcomed.

- **Rights of Way to be left undisturbed by developments (Mrs E Brown)**

Disagree. There is a separate legal framework which controls changes to the Rights of Way system. PPW in paragraph 1.2.4 states that 'The planning system normally should not be used to secure objectives achievable under other legislation. The principle of non-duplication should be maintained even though the powers and duties resulting from other legislation may also be the concern of local authorities' (WG PPW Edition 4 p10).

- **A467 Brynmawr to Newport to be upgraded (Cllr D Hancock) (Mr A Thomas)**

Disagree. The Road Hierarchy Map to which this comment refers reflects the Strategic Highway Network identified in the SEWTA Regional Transport Plan (Figure 4.3) and the Blaenau Gwent Local Transport Plan and the Blaenau Gwent Local Transport Plan Road Hierarchy map (BG 2000 Figure 1). The LDP Regulations prescribe that LDPs must have regard to the Local Transport Plan and other policies prepared under section 108 of the Transport Act 2000 (WG 2005 Paragraph 1.7). It should be noted that the Brynmawr to Newport road has not been downgraded, rather the A4046 has been upgraded to respond to the Wales Spatial Plan aim to link the 14 key settlements across the 'Capital Network'. The Plan has had regard to other relevant plans, policies and strategies relating to the area.

- **Recognise need for off street parking and signage (SBCF)**

Disagree. Whilst car parking is a valid land use consideration to be addressed within the Plan it is not considered to be a Strategic consideration. Car parking is dealt with in DM1 and more information will be provided in the Supplementary Planning Guidance to be prepared on Access, Car Parking and Design. Signage is not a land use issue and is more appropriately dealt with by the Highways Division.

- **Address highway congestion, speeding, on street parking, drop kerbs and how the effects of pollution are going to be addressed (Mr A Thomas)**

Disagree. Any future highway congestion issues are being addressed through schemes identified in the plan or will be addressed through S278 Agreements at planning application stage. Speeding, on street parking, drop kerbs are procedural matters more appropriately addressed by the Police or Highways Division. The Plan attempts to reduce pollution through the location of development and the encouragement of alternative transport modes. The effects of pollution from new development, including roads will be addressed through policy DM3(b). The reasoned justification for the policy explains that based on the information available at present, it is unlikely that any of the air quality objectives that the Council are required to have regard to, are, or likely to be exceeded in the immediate future.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: SP7 Climate Change (Paragraphs 6.45 – 6.52)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.212	Countryside Council for Wales (CCW)	Unsound (CE1)	Amend Criterion 1a to ensure that developments for renewable and low carbon technologies do not cause undue harm to the natural and built environment.
18D.172	Environment Agency Wales (EA)	Sound	Amend justification text in paragraph 6.52 for clarity.
41D.348	DTZ for Questedge Ltd (DTZ)	Unsound (CE2, CE4)	The Plan should recognise the sequential preference of some greenfield sites to deliver sustainability objectives and promote regeneration, community facility improvements and stronger service centres within the settlement hierarchy.
82D.388	Six Bells Communities First (SBCF)	Sound	Fully supports SP7.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Ensuring that developments for renewable and low carbon technologies do not cause undue harm to the natural and built environment (CCW) • Amend justification text in paragraph 6.52 to clarify the following: Emergency services and highly vulnerable development should not be permitted in zone C2.
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When considering the flood risk implications of a development, in terms of risks off-site, Tan15 is clear, there should be no flooding elsewhere.

As part of the justification test for development in zone C, a FCA needs to be carried out to demonstrate that the risks and consequences of flooding can be managed appropriately. (EA)

- The Plan should recognise the sequential preference of some greenfield sites (DTZ)
- Support for Policy SP7 (SBCF)

Desired Changes to LDP

- Insert 'appropriately located' before 'renewable' in criterion1a (CCW)
- Amend text in paragraph 6.52 to clarify the following:
Emergency services and highly vulnerable development should not be permitted in zone C2.

When considering the flood risk implications of a development, in terms of risks off-site, Tan15 is clear, there should be no flooding elsewhere.

As part of the justification test for development in zone C, a FCA needs to be carried out to demonstrate that the risks and consequences of flooding can be managed appropriately. (EA)

- Recognise the sequential preference of some greenfield sites (DTZ)

COUNCIL RESPONSE

Council Analysis

- **Ensuring that developments for renewable and low carbon technologies do not cause undue harm to the natural and built environment (CCW)**

Disagree. Policy DM5 – Low and Zero Carbon Energy is the development management policy which ensures that renewable and low/zero carbon energy technologies are appropriately located.

- **Amend justification text in paragraph 6.52 (EA)**

Agree. Paragraph 6.52 should be replaced by the following text:

New development will be directed away from areas of flood risk identified in TAN 15: Development and Flood Risk as high risk (Zone C). Emergency services and highly vulnerable development will not be permitted in zone C2 but where other development has to be considered in those areas it will only be permitted if it can be justified on the basis of the tests outlined in TAN 15. As part of the justification test for development in zone C, a FCA will need to be carried out to demonstrate that the risks and consequences of flooding can be managed appropriately. Any development would only be allowed where it can be justified in that location and satisfies a FCA.

- **The Plan should recognise the sequential preference of some greenfield sites (DTZ)**

Disagree. The Plan fully accords with Planning Policy Wales Edition 4

(February 2011) where the preference is for brownfield land over the development of greenfield sites, as reflected in criterion 1d and paragraph 6.51 of Policy SP7.

The allocations made in the Plan were subject to a rigorous site assessment process to ensure they were developable, sustainable and in accordance with the LDP Strategy. The site assessments took into account a cross cutting range of issues, the greenfield / brownfield split was only one element of these assessments.

The site assessments identified that some previously developed land had issues relating to contamination and ground stability. Therefore an allocation was not made due to questions arising over the viability of the site.

- **Support for SP7 (SBCF)**
Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy SP7 criterion paragraph 6.52 is amended as follows:

New development will be directed away from areas of flood risk identified in TAN 15: Development and Flood Risk as high risk (Zone C). Emergency services and highly vulnerable development will not be permitted in zone C2 but where other development has to be considered in those areas it will only be permitted if it can be justified on the basis of the tests outlined in TAN 15. As part of the justification test for development in zone C, a FCA will need to be carried out to demonstrate that the risks and consequences of flooding can be managed appropriately. Any development would only be allowed where it can be justified in that location and satisfies a FCA.

~~New development will be directed away from areas of flood risk identified in TAN 15: Development and Flood Risk as high risk (Zone C). Where development has to be considered in identified high risk areas only those developments which can be justified on the basis of the tests outlined in TAN 15 will be permitted within such areas. Where development is required to be located in such locations the Council will assess the flood risk implications of development proposals and prevent development that unacceptably increases risk to the proposed development and risk to third parties as a result of proposed development. Such development would only be allowed where development is justified in that location and information is provided to demonstrate that a proposal satisfies the Flood Consequence Assessment as~~

set out in TAN 15.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: SP8 Sustainable Economic Growth (Paragraphs 6.53 – 6.62)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.327	Welsh Government (WG)		The plan advises that the proposed Learning Zone at 'The Works', is subject to 'Ministerial Decision and Judicial Review' (paragraph 6.61). The position has been resolved; the Minister gave approval.
82D.390	Six Bells Communities First (SBCF)		There is a failure to mention the developing tourism developments and resulting economic development within Six Bells in SP8.
82D.391	Six Bells Communities First (SBCF)		There is a failure to mention social enterprises and their valuable role in all aspects of economic growth and the development of the creation of learning skills and development.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Provide clarity on the latest position with the proposed Learning Zone at the Works (WG)
- Failure to mention the tourism developments within Six Bells (SBCF)
- Failure to mention social enterprises and the development of the creation of learning and skills development (SBCF)

Desired Changes to LDP

- Update paragraph 6.61 to reflect the latest position with the proposed Learning Zone at the Works (WG)
- Reference the tourism developments and resulting economic development within Six Bells in SP8 (SBCF)

- Reference social enterprises and the development of the creation of learning and skills development in SP8 (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Provide clarity on the latest position with the proposed Learning Zone at the Works (WG)**

Agree. Remove (subject to ministerial decision and Judicial Review) at the end of paragraph 6.61.

- **Failure to mention the tourism developments within Six Bells (SBCF)**

Objector considers that reference should be made to areas outside the hubs/town centres to recognise the contribution these are providing to economic growth.

Agree. It would assist the clarity of the Plan if reference were made to the Guardian at Parc Arrael Griffin.

However, Policies SP1, SP2, SP9 and SP11 recognise the importance of leisure and tourism developments outside of hubs and town centres. Paragraphs 6.57 and 6.60 recognise the importance of leisure and tourism developments in the diversification of the economy. Criterion d of policy SP8 is in accordance with national planning policy. It is therefore unnecessary to make amendments to policy SP8.

Amend the text of paragraph 6.59 to read:

The Business Competitiveness Study (2009) identified a shortfall in local cultural facilities. *Projects such as Parc Bryn Bach, Abertillery's Metropole Cultural and Conference Centre, the Guardian at Parc Arrael Griffin are making a difference, but further opportunities exist.*

- **Failure to mention social enterprises and the development of the creation of learning and skills development (SBCF)**

Disagree. Paragraph 6.57 identifies the other key sectors where Blaenau Gwent should focus for maximum impact in the diversification of its economy. Business Services is one of the sectors identified. It is therefore considered that social enterprises are covered under the Business Services sector. Whilst this plan recognises the issues and provides land to deal with them there are other Strategies such as the Regeneration Strategy which provide further detail.

With regard to the development of the creation of learning skills and development. This issue is covered in policy SP8 criterion f and paragraph 6.61. Therefore no change is required.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that (subject to ministerial decision and Judicial Review) be removed at the end of paragraph 6.61.

That the Council recommend to the Planning Inspector that Paragraph 6.59 be amended to read:

The Business Competitiveness Study (2009) identified a shortfall in local cultural facilities. ~~and that P~~projects such as Parc Bryn Bach, ~~and~~ Abertillery's Metropole Cultural and Conference Centre, *the Guardian at Parc Arrael Griffin* are making a difference, but further opportunities exist.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: SP9 Active and Healthy Communities (Paragraphs 6.63 – 6.65)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.215	Countryside Council for Wales (CCW)	Sound (C2, CE1)	Supports Policy SP9 and considers it meets C2 and CE1.
20.D.364	Public Health Wales (PHW)	Sound	Supports the recognition in the Plan of the contribution that the built environment makes to the health of residents, the opportunities for active travel and protection of open/green spaces.
33D.23	Mrs E Brown	Unsound (CE2)	Insufficient corridor links for Blue Lakes area and need more link up routes (for example, to Rassau, Beaufort, Badminton Ward, Hilltop Pond, St James Pond, the Domain Mountain and the Works Site via Garden City) away from traffic in order to promote SP9.
49D.334	Pontypool Park Estate (PPE)		Aspiration for 80% of population to live within 400m of the nearest green space is facile and it would do people more good to walk further.
82D.394	Six Bells Communities First (SBCF)		Housing development on open land at Six Bells will not adhere to SP9 paragraph 6.65 as the land is not being protected and utilised as part of the Council's strategy to improve the public health of the resident population.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for SP9 (CCW) (PHW)
- Insufficient corridor links for Blue Lakes area (Mrs E Brown)
- Facile aspiration for 80% of population to live within 400m of the nearest green space (PPE)
- Housing development on a green space will be contrary to SP9 (SBCF)

Desired Changes to LDP

- Insufficient corridor links for Blue Lakes area (Mrs E Brown)
- The change is not clearly stated (PPE)
- The change is not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Supports Policy SP9** (CCW) (PHW)

Support welcomed.

- **Insufficient corridor links for Blue Lakes area** (Mrs E Brown)

It is recognised that access to natural green space (as well as public open space and recreational facilities) is important in promoting public health and wellbeing, thereby increasing the quality of life for residents and visitors.

Blaenau Gwent County Borough Council commissioned consultants (Exegesis) to undertake an Accessible Natural Green Space Assessment in conjunction with four other local authorities. The Natural Green Space Assessment calculated accessibility to green space using four standards, three of which Blaenau Gwent met fully. The only standard where this was not met fully was in respect of those living within 400m of their nearest green space, where it was found that 65% have access. Therefore, in order to promote SP9 Active and Healthy Communities the Council intends to increase the percentage of people who live within 400m of their nearest green space from 65 to 80%. Further information is available in the Leisure Background Paper. The Rights of Way Officer is currently improving links to open space to improve the percentage of people who are within 400m of their nearest green space. Blaenau Gwent's Rights of Way Improvement Plan (2009-2014) has been produced to meet the requirements of the Countryside and Rights of Way Act 2000, and is the cornerstone of the future management, maintenance and improvement of the local rights of way network.

The Ebbw Vale Sustainable Regeneration Framework, which is due to be adopted as Supplementary Planning Guidance in late 2011 has identified a green corridor in this area and encourages green links. Further information is

available in the Ebbw Vale Sustainable Regeneration Framework report. Additional text has been added to paragraph 8.9 of MU1 Ebbw Vale Northern Corridor, explaining that the Ebbw Vale Sustainable Development Framework identifies the importance of establishing a network of green links in order to allow the effective integration of the SINCs and other key habitat areas.

- **Facile aspiration for 80% of population to live within 400m of the nearest green space (PPE)**

Disagree. PPE comments that it is a facile aspiration to improve from 65% to 80% the percentage of population who live within 400m of their nearest green space and that it would do people more good to walk further.

The target was set at 80% not because it was an easy target but because it was considered realistic and achievable given the resources available.

CCW's innovative Green Space Toolkit is designed to help local authorities plan and improve natural green areas for people in towns and cities. It's about ensuring that people have places to enjoy nature close to their homes, so important for physical and mental well-being. The toolkit recommends that 'No person should live more than 400 metres walking distance from their nearest area of natural greenspace'. The benefits of green space are far more wide-reaching than the physical walk to such sites as they help to reduce stress and improve mental health through enjoyment of open space and nature.

The importance of the connectivity between open spaces is recognised in Policy DM16, which refers to the Green Infrastructure (see Environment Background Paper for further information). By protecting and improving links to green spaces those able to walk distances well in excess of 400m will thereby be able to.

- **Housing development on a green space will be contrary to SP9 (SBCF)**

The purpose of the Blaenau Gwent Local Development Plan is to guide the future development of the area and it allocates land for different types of uses such as for employment or residential. It is recognised that land is subject to competing uses and in this case the land in question at Six Bells has been allocated for residential use. The land was proposed for housing as part of the candidate site process and it should be noted that all allocations made in the Plan were subject to a rigorous site assessment process to ensure they were developable, sustainable and in accordance with the LDP Strategy. A leisure contribution (to develop existing facilities in Parc Arael Griffin) will be sought as part of any development. SP9 will serve to protect and improve existing open space, which has not been allocated for another specific purpose.

An open space assessment has been carried out in Blaenau Gwent and the results are contained in the Leisure Background Paper. The open space assessment has now been updated and includes open space (not previously included) at the former colliery site. A revised calculation has been made, indicating that there is a surplus of open space in the Six Bells ward of over 4 hectares.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: SP10 Protection and Enhancement of the Natural Environment (Paragraphs 6.66 – 6.68)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.147	Welsh Government (WG)	Unsound (CE2,CE3,CE4)	Policy drafting is at odds with Planning Policy Wales (PPW) (paragraph 5.4.5). SP10 states that 'Blaenau Gwent's unique, natural environment and designated landscape will be protected, preserved and, where appropriate enhanced'. PPW provides for the conservation and enhancement of the natural environment but there is no mention of the requirement to 'preserve'.
3D.148	Welsh Government (WG)	Unsound (CE2,CE3,CE4)	Policy justification should be sufficiently clear to enable identification of the sites that it relates to
3D.153	Welsh Government (WG)		Repetition of national policy
10D.216	Countryside Council for Wales (CCW)	Sound	General support but queries what is meant by 'important species'
10D.218	Countryside Council for Wales (CCW)	Unsound (C2)	Provide greater clarity to text in paragraph 6.68
16D.27	Cllr John Morgan acting for Tredegar Town Council (Cllr J Morgan)	Unsound	Measures need to be implemented to protect the quality and character of the landscape north of Trefil and enhance where necessary, for example, as a film location
18D.83	Environment Agency Wales (EA)	Unsound (CE1,CE2)	SP10 does not facilitate improvements to water quality and is limited to protection only, which implies that Blaenau Gwent is only aiming to maintain

			the status quo
19D.17	DPP acting for Newbridge Construction Limited (DPP)	Sound	Supports general provisions of SP10 but considers criteria e) and f) contradict section 7.83 of the Plan and could be a constraint to the future development of Bryn Serth
33D.22	Mrs E Brown	Unsound (CE2)	Statement in paragraph 6.68 has a get out clause where special species and habitats are concerned and gives priority to development. If a site is of special interest (such as the SINC's at Bryn Serth, Rhyd-y-Blew and Blue Lakes) then development should be limited to preserve some of the site
46D.44	Brecon Beacons National Park Authority (BBNP)	Unsound (C1, C2)	SP10 does not make reference to BBNP although it refers to 'designated landscapes'.
49D.332	Pontypool Park Estate (PPE)	Sound	Support for policy SP10 as a good section

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Policy drafting is at odds with Planning Policy Wales (WG)
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- Policy justification should be sufficiently clear to enable identification of the sites that it relates to, for example, no mention of the 2 SSSIs in Blaenau Gwent (WG)
- Repetition of national policy (WG)
- Questions what is meant by 'important' species in criterion c (CCW)
- Seeks clarification of paragraph 6.68 (CCW)
- The landscape north of Trefil needs protection and enhancement (Cllr J Morgan)
- LDP Policies including SP10 do not facilitate improvements to water quality (EA)
- Amendment required to criteria e) and f) as they contradict section 7.83 (DPP)
- Priority of development over SINC's (Mrs E Brown)
- No reference to BBNP and clarity required to 'designated landscape' (BBNP)
- Supports SP10 (PPE)

Desired Changes to LDP

- Delete the requirement to 'preserve' in SP10 (WG)
- Add text to the policy justification to enable identification of the sites that the policy relates to (WG)
- LDP policies should not repeat national planning policy and there should not be any specific references to national planning policy within the policies (WG)
- Delete 'important' before species in criterion c (CCW)
- 'Compensatory provision equivalent' in the 9th line of paragraph 6.68 should be amended to read 'compensatory provision equivalent in value to that lost...' (CCW)
- The change is not clearly stated (Cllr J Morgan)
- Policy SP10 should be amended to incorporate provisions for the improvement of water quality within Blaenau Gwent, taking into account the current water bodies failures and the likely reasons for these failures (EA)
- Amend criteria e) and f) to read as follows:
 - e. Ensuring that development retains, protects and enhances features of ecological or geological interest *wherever possible* and provides for the appropriate management of these features; and
 - f. Ensuring development seeks to produce a net gain in biodiversity *wherever practicable* by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for. (DPP)
- The change is not clearly stated (Mrs E Brown)
- A paragraph be included in section 6.6 to reflect the Section 62(2) duty and Policy SP10 be amended to clarify reference to 'designated landscapes' and if appropriate include reference to 'designated National Park landscape' (BBNP)

COUNCIL RESPONSE

Council Analysis

- **Policy drafting is at odds with Planning Policy Wales (WG)**

Agree. Delete the requirement to 'preserve' in SP10 as it is at odds with PPW

- **Policy justification should be sufficiently clear to enable identification of the sites that it relates to, for example, no mention of the 2 SSSIs in Blaenau Gwent (WG)**

Agree. The following sentences should be added to Paragraph 6.66:

Blaenau Gwent does not contain any European sites, although several SACS are in close proximity. It does, however, contain 2 SSSIs which are sites of national importance.

- **Repetition of national policy in criterion a and c (WG)**

In criterion a it is considered that the reference to national policy should not be deleted in order to comply with the requirements of the HRA.

However, this criterion needs amending to include text from criterion c which is to be deleted.

Amend criterion a as follows:

Protecting national, European and international nature conservation sites in line with national planning policy *as well as other species and habitats identified as priorities for nature conservation;*

Delete criterion c

- **Questions what is meant by 'important' species in criterion c (CCW)**

Agreed. It would be difficult to define 'important' when referring to species'. In order to be consistent with national policy the word 'important' should be deleted from criterion c. As criterion c is being deleted and some text being relocated this change is now reflected in criterion a.

- **Seeks clarification of paragraph 6.68 (CCW)**

Agree. Amend the sentence below in paragraph 6.68 as follows:

Mitigation will be necessary to offset any negative effects and where this is not possible, compensatory provision equivalent *in value* to that lost as a result of the development will be necessary.

- **The landscape north of Trefil needs protection and enhancement (Cllr J Morgan)**

Noted. In recognition of its high landscape importance a Special Landscape Area (ENV2.7 Trefil and Garnlydan Surrounds) has been designated to the north of Trefil. The extent of the Special Landscape Area is shown on the LDP Proposals Map. Special Landscape Areas are non-statutory designations applied by local authorities to define and protect areas of high landscape importance and further information on Special Landscape Areas is contained

in paragraphs 5.48 – 5.52 of the Environment Background Paper.

In respect of the potential for the area to be used as a film location this is supported by Policy SP11 criterion C which encourages the promotion of heritage tourism.

- **LDP Policies including SP10 do not facilitate improvements to water quality (EA)**

Agree. Add the following criterion and supporting text:

g *Ensuring development proposals do not have an unacceptable adverse impact upon the water environment and contribute to improving water quality where practicable.*

The natural environment also covers water. This policy promotes the protection and improvement of the quality and quantity of controlled waters within the County Borough, including the surface and groundwater resource. Policy DM3 provides more detail and should be referred to when considering development proposals affecting the water environment.

This representation has also been considered in Policy DM3, which has been amended accordingly.

- **Amendment required to criteria e) and f) as they contradict section 7.83 (DPP)**

Disagree. Policy DM15 paragraph 7.83 explains that the designation of non-statutory sites such as SINC's does not preclude appropriate socio-economic activities.

This is in line with national planning policy (PPW Edition 4 paragraph 5.4.4). It is not considered that the wording of paragraph 7.83 contradicts criterion e and f of policy SP10. National planning policy is quite clear on this as paragraph 5.5.2 of PPW Edition 4, 2011 states as follows:

5.5.2 When considering any development proposal (including on land allocated for development in a development plan) local planning authorities should consider environmental impact, so as to avoid, wherever possible, adverse effects on the environment. Where other material considerations outweigh the potential adverse environmental effects, authorities should seek to minimise those effects and should, where possible, retain and, where practicable, enhance features of conservation importance.

The suggested additional wording to criterion e and f is considered unnecessary.

- **Priority of development over SINC's (Mrs E Brown)**

There are a variety of statutory (both national and international) and non-statutory designations that cover sites of nature conservation and wildlife value in Blaenau Gwent, which are a material consideration when determining planning applications. They are afforded different levels of protection, for example, locally designated sites such as SINC's are afforded less protection than statutory sites. Further information is contained in the Council's

Supplementary Planning Guidance on Biodiversity and Geodiversity (see figure 4 p.26)

It should be noted that the intention is still to both protect and enhance biodiversity in Blaenau Gwent.

- **No reference to BBNP and clarity required to 'designated landscape.** (BBNP)

Agree. Add the following text to the end of paragraph 6.66:

Designated landscapes include local designations such as Special Landscape Areas as well as national designations such as national parks. Relevant authorities have a legal duty under section 62(2) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated. Thus any development within Blaenau Gwent should not have an unacceptable impact on the setting of Brecon Beacons National Park which is in close proximity.

- **Supports Policy SP10 (PPE)**

Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy SP10 be amended to read as follows:

Blaenau Gwent's unique, natural environment and designated landscape will be protected, ~~preserved~~ and, where appropriate enhanced'.

That the Council recommend to the Planning Inspector that Policy SP10 paragraph 6.66 be amended by the inclusion of the following sentences:

Blaenau Gwent does not contain any European sites, although several SACS are in close proximity. It does, however, contain 2 SSSIs which are sites of national importance.

That the Council recommend to the Planning Inspector that Policy SP10 criterion a is amended as follows:

Protecting national, European and international nature conservation sites in line with national planning policy *as well as other species and habitats identified as priorities for nature conservation;*

That the Council recommend to the Planning Inspector that Policy SP10

critterion c is deleted:

~~b. Giving appropriate consideration to European and nationally designated and other important species and habitats identified as priorities for nature conservation, in line with national planning policy;~~

That the Council recommend to the Planning Inspector that Policy SP10 paragraph 6.68 is amended to read as follows:

Mitigation will be necessary to offset any negative effects and where this is not possible, compensatory provision equivalent *in value* to that lost as a result of the development will be necessary.

That the Council recommend to the Planning Inspector that the following criterion and supporting paragraph be added to Policy SP10:

Ensuring development proposals do not have an unacceptable adverse impact upon the water environment and contribute to improving water quality where practicable.

The natural environment also covers water. This policy promotes the protection and improvement of the quality and quantity of controlled waters within the County Borough, including the surface and groundwater resource. Policy DM3 provides more detail and should be referred to when considering development proposals affecting the water environment.

There is a consequential amendment to the cross reference box as a result of this change (include reference to DM3).

That the Council recommend to the Planning Inspector that the following text be added to paragraph 6.66 :

Designated landscapes include local designations such as Special Landscape Areas as well as national designations such as national parks. Relevant authorities have a legal duty under section 62(2) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated. Thus any development within Blaenau Gwent should not have an unacceptable impact on the setting of Brecon Beacons National Park which is in close proximity.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan

Policy: SP11 Protection and Enhancement of the Built Environment (Paragraphs 6.69 – 6.70)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound /Unsound	Comment
3D.155	Welsh Government (WG)		Policy and title called Built Environment but relates to broader historic environment.
3D.325	Welsh Government (WG)		Repetition of national policy.
10D.220	Countryside Council for Wales (CCW)	Sound (C2, CE1)	Supports Policy SP11:Protection and Enhancement of the Built Environment and it meets C2 and CE1.
16D.26	Cllr John Morgan acting for Tredegar Town Council (Cllr J Morgan)		Tredegar’s uniqueness and historical importance should be preserved, enhanced and developed.
16D.106	Cllr John Morgan acting for Tredegar Town Council (Cllr J Morgan)		Development of Trefil as a location for the film industry.
49D.333	Pontypool Park Estate (PPE)		Good section on archaeology (SP11).
82D.395	Six Bells Communities First (SBCF)		Requests that the Guardian should be registered as a building of local and national importance and it and its surrounding area is therefore protected from housing development.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:
None identified

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Questions title of policy (WG) • Repetition of national policy (WG) • Supports Policy SP11 (CCW) (PPE) • Tredegar’s uniqueness and historical importance should be preserved, enhanced and developed (Cllr J Morgan)

- The landscape north of Trefil needs to be developed for the film making industry (Cllr J Morgan)
- Guardian should be registered as a building of local and national importance (SBCF)

Desired Changes to LDP

- The change is not clearly stated (WG)
- LDP policies should not repeat national planning policy and there should not be any specific references to national planning policy within the policies (WG)
- The change is not clearly stated (Cllr J Morgan)
- The change is not clearly stated (Cllr J Morgan)
- The change is not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Questions title of policy** (WG)
Agree. Amend title to 'Protection and Enhancement of the Built Historic Environment'.
- **Repetition of national policy** (WG)
Agree. Criterion a should be amended as follows:
Safeguarding nationally designated sites from inappropriate development in line with national planning policy and guidance and also protecting locally designated buildings of significant importance and conservation areas.
- **Supports Policy SP11** (CCW) (PPE)
Support welcomed.
- **Tredegars uniqueness and historical importance should be preserved, enhanced and developed.** (Cllr J Morgan)
Noted. The Representer states that Tredegars uniqueness and historical importance should be preserved, enhanced and developed. Policy SP11 supports this as it relates to the protection and enhancement of the built environment. Blaenau Gwent's (including Tredegar) distinctive built environment will be protected preserved and, where appropriate, enhanced. This will be achieved by criteria a-c in this policy. Criterion c relates to the promotion of heritage tourism and reference is made in the supporting text to Bedwellty House and Park which have recently been restored. This is a good example of what can be achieved not only in Tredegar but also throughout the Borough.
- **The landscape north of Trefil needs to be developed for the film making industry** (Cllr J Morgan)

In respect of the potential for the area to be used as a film location this is supported by Policy SP11 criterion C which encourages the promotion of heritage tourism. Planning permission would probably not be required for such development as it is not normally required for temporary use of land for up to 28 days.

- **Guardian should be registered as a building of local and national importance (SBCF)**

The aim of Policy DM18 Buildings and Structures of Local Importance is to protect buildings and structures of significant local importance, which are not statutorily listed by CADW and not currently afforded protection by law.

It is proposed that a register of buildings and structures of significant local importance will be compiled from visual surveys and consultation with local interest groups. Further information, including methodology to be used to assess whether a building or structure merits inclusion in the register will be available when Supplementary Planning Guidance is prepared. It is not known when this list will be compiled but it is likely to be after the Plan is adopted in 2013.

For the Guardian to be registered as a building of national importance it would have to be listed by CADW, who should be contacted for further information regarding the process.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the title of Policy SP11 is amended as follows:

'Protection and Enhancement of the Built Historic Environment'.

That the Council recommend to the Planning Inspector that Policy SP11 criterion a is amended as follows:

Safeguarding nationally designated sites from inappropriate development ~~in line with national planning policy and guidance~~ and also protecting locally designated buildings of significant importance and conservation areas;

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

**Policy: SP12 Secure an Adequate Supply of Minerals
(Paragraphs 6.71-6.75)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.222	Countryside Council for Wales (CCW)	Sound (C2, CE1)	Considers that policy SP12 meets Tests of Soundness C2 and CE1.
26D.65	Harmers Limited acting for Gryphon Quarries Ltd (Harmers)	Unsound (C1, C2, CE2)	Disagrees with the RTS 3Mt apportionment and considers that it should be raised to 6Mt to absorb some of BBNP requirement. Issues with the apportionment process in terms of taking BBNP requirement and the fact that the process ignores the availability of resources.
45D.55	Confederation of UK Coal Producers (CoalPro)	Unsound (C2)	Wrong to say that coal working within 500m from urban boundary is not acceptable in accordance with national policy. Para. 49 of MTAN2 sets out exceptional circumstances where coal working may be permitted within 500m and within designated areas.
49D.331	Pontypool Park Estate (PPE)		Supports the minerals section in strategic policy (SP) 12. The Plan notes the environmental gains that can come from appropriate mineral extraction, which can unlock money for planning gain, as well as allow re-profiling of industrial scars.
50D.45	The Coal Authority (CA)	Unsound (C2, CE4)	Policy SP12 should refer to areas where coal working will "generally" not be acceptable - in line with MTAN2. The supporting text in paragraph 6.74 does not reflect the tone of MTAN2 and is seeking to be more restrictive than national policy.
50D.54	The Coal Authority	Sound	Support the broad approach

	(CA)		towards the safeguarding of surface coal resources and the encouragement of prior extraction in line with MTAN2.
50D.52	The Coal Authority (CA)	Sound	Supports the approach set out in SP12 that the considerations set out in national policy will apply to new proposals. Suggest improvement to cross referencing to national policy though accepts cross reference to DM20 should suffice.
50D.46	The Coal Authority (CA)	Sound	Supports the strategic commitment aimed at achieving high standards of restoration following mineral extraction.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Support for Policy SP12 (CCW) (PPE) • Apportionment wrong - should be raised to 6Mt to absorb BBNP requirement (Harmers) • Clarification of where Coal Working is acceptable (CoalPro) (CA) • Support for broad approach towards the safeguarding of surface coal resources (CA) • Supports approach where national policy will apply to new proposals (CA) • Supports commitment to high standards of restoration (CA)
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Desired Changes to LDP

- Apportionment figure in criterion a be amended to "6Mt". Paragraph 6.73 should be amended to refer to a shortfall of at least 3.76Mts (Harmers).
- Redraft criterion e to refer to exceptional circumstances. Redraft paragraph 6.74 to explain that coal extraction is not prohibited within National designations of environmental and cultural importance (CoalPro).
- Include the word "generally" before ...be acceptable; and in Policy SP12 criterion e). Include the word generally in Paragraph 6.74 and add 3 sentences as set out in the representation to clarify circumstances where coal working may be acceptable (CA).

COUNCIL RESPONSE

Council Analysis

- **Support for Policy SP12 (CCW) (PPE)**

Support welcomed.

- **Apportionment wrong - should be raised to 6Mt to absorb BBNP requirement** (Harmers)

This objection relates to the apportionment process identified in the Regional Technical Statement (RTS) which was subject to consultation in January 2008. Harmers consider the 3Mt apportionment figure is wrong on two grounds. Firstly with the statement that Blaenau Gwent could not additionally absorb some of BBNP apportionment and secondly with the process by which the figure for each authority was based (population, environmental capacity and the proximity principle) as it ignores the availability of resources.

Although they welcome the identification of the extension to the site they do not want to be restricted by an artificially depressed apportionment figure. They argue that a planning application will be required well before the end of the Plan period as the existing permission will be exhausted by then.

Disagree. No justification has been demonstrated for increasing the apportionment figure for Blaenau Gwent and decreasing the BBNP apportionment. The current consented reserves in the BBNP cannot be reduced at present unless there is successful service of prohibition orders which are the responsibility of BBNP as Mineral Planning Authority and not the RTS process. Whilst there is some reference to the desirability of MPA's adjoining the BBNP taking on some of the future demand in the RTS, this is very much for the future when the BBNP reserves have been reduced over time (Recommendation 81 of RTS). It could be argued that Vaynor Quarry in Merthyr is more strategically placed to serve any future demand from the main urban area of Brecon within the BBNP.

The second issue raised regarding the distribution of resources not being taken into account can cause issues for some authorities although this can be addressed through agreements between authorities. MTAN1 also infers

strongly that the present method of calculating landbanks needed to be reconsidered (i.e. based on apportionment derived from past production and reserves), as it reinforces the existing distribution of operations, a system based on perpetuating historic producing areas.

- **Clarification of where Coal Working is acceptable (CoalPro) (CA)**

The Council has determined that coal working in the identified areas is unacceptable.

- **Support for broad approach towards the safeguarding of surface coal resources (CA)**

Support welcomed.

- **Supports approach where national policy will apply to new proposals (CA)**

Support noted. It is considered that the cross reference to DM10 is sufficient.

- **Supports commitment to high standards of restoration (CA)**

Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: SP13 Delivering Sustainable Waste Management
(Paragraphs 6.76-6.81)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.223	Countryside Council for Wales (CCW)	Unsound (C2)	Given that national policy seeks to minimise the amount of waste being generated, such a high allocation of land (above RWP requirement) appears to contradict national policy, and be contrary to Test of Soundness C2.
49D.330	Pontypool Park Estate (PPE)		The representation supports the waste and recycling section in Strategic Policy 13 -Delivering Sustainable Waste Management.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
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Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Objects to over allocation of land (CCW)
- Support for Policy SP13 (PPE)

Desired Changes to LDP

- Change not clearly stated (CCW)

COUNCIL RESPONSE

Council Analysis

- **Objects to over allocation of land (CCW)**

Disagree. The idea that a high level of land for waste recycling facilities contradicts national policy is incorrect. The availability of land will not create waste generation, as in determining any future planning application Policy DM21 requires there is a proven local and regional need for any facility. The Plan is required to provide 4ha to accord with the Regional Waste Plan requirement for land to meet the needs of more than one authority. The site identified has been selected as part of the HoV organics project to be offered as an optional site for use for a facility(ies). It should be noted that the indicative developable area is 4.6 ha which is only slightly above the 4ha the Plan is required to make available.

It should be noted that there are other requirements for sites for waste management facilities such as the need to relocate existing waste transfer businesses which the Plan needs the flexibility to address.

It should also be noted that the land is also identified for general employment use under policy EMP1.6 and if not required for a waste management facility can be used for B1, B2, B8 and appropriate Sui Generis uses in accordance with EMP1.

- **Support for Policy SP13 (PPE)**

Support noted.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: DM1 New Development (Paragraphs 7.4 – 7.17)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.225	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Specific reference should be included in criterion 1 of Policy DM1 for a requirement for biodiversity enhancement, as set out in TANs 5 & 12.
18D.35	Environment Agency Wales (EA)	Unsound (CE4)	Clarity required in paragraph 7.10 of when a developer is required to carry out a risk assessment for contaminated sites.
50D.47	The Coal Authority (CA)	Unsound (C2, CE4)	MTAN2 paragraph 44 requires a general DC policy to be included to deal with land stability. The Coal Authority supports DM1 criteria 2e and para.7.9 but requests that the mining legacy area is illustrated on the Constraints Map.
50D.51 50D.53	The Coal Authority (CA)	Unsound (C2, CE4)	All development is at risk from mining legacy and will lead to potential sterilisation of surface coal resources. The economics of stabilising land needs to be considered and prior extraction should also be considered by the developer.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Requirement for biodiversity enhancement (CCW)
- Clarity required of when to carry out a risk assessment for contaminated sites (EA)
- Areas of mining legacy should be illustrated on the constraints map (CA)
- The economics of stabilising land needs to be considered (CA)

Desired Changes to LDP

- Include a requirement in criterion d of Policy DM1 for biodiversity enhancement (CCW)
- Clarify when a developer is required to carry out a risk assessment for contaminated sites (EA)
- Include areas of mining legacy on the constraints map (CA)
- The Plan needs to set an appropriate policy framework for dealing with these important issues (CA)

COUNCIL RESPONSE

Council Analysis

- **Requirement for biodiversity enhancement (CCW)**

Disagree. Policies SP10 and DM15 cover biodiversity protection and enhancement therefore the addition of a further criterion to DM1 is considered unnecessary.

- **Clarity required of when to carry out a risk assessment for contaminated sites (EA)**

Agree. Amend the second sentence of paragraph 7.10 to read:

Where development is proposed on sites known, or suspected to be contaminated, or where the site is in the vicinity of a former landfill site, the developer will be required to carry out a risk assessment *at the planning application stage*.

- **Areas of mining legacy should be illustrated on the constraints map (CA)**

Disagree. The Inspector at the Merthyr LDP Examination considered there was no need to include the information on the Constraints map. However, it is suggested that paragraph 7.9 is updated as follows to refer to the Coal Authority Development Referral Areas and what is required of developers.

Much of the Blaenau Gwent area was subject to past underground mining activities *and is therefore within a Coal Mining Referral Area. Maps highlighting the Coal Mining Referral Areas are held for inspection within the*

Council, with responsibility for determining the extent and effects of these constraints resting with the developer. Where development is proposed in these areas, the developer should consult with the Coal Authority.

- **The economics of stabilising land needs to be considered (CA)**

The Council recognises the importance of mining legacy and has a policy framework in place for dealing with it. The economics of stabilising land is a normal consideration for developers in Blaenau Gwent. The issue appears to be the prior extraction of coal and this is addressed in focused changes to the Plan which incorporates the word 'generally' (SP12). This will allow the exceptional circumstances set out in MTAN 49 to be taken into consideration when determining applications for prior extraction.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the second sentence of paragraph 7.9 be amended to read:

Much of the Blaenau Gwent area was subject to past underground mining activities *and is therefore within a Coal Mining Referral Area. Maps highlighting the Coal Mining Referral Areas are held for inspection within the Council, with responsibility for determining the extent and effects of these constraints resting with the developer. Where development is proposed in these areas, the developer should consult with the Coal Authority.* The Local Planning Authority will be guided by advice from the Coal Authority and the Council's own technical staff whether development is acceptable and whether conditions requiring ground stability precautions should be attached to permissions. In other instances development may affect landslip areas. In such instances applications will need to be supported by a geotechnical investigation and stability report to identify any remedial measures to deal with any instability. This investigation may show that the development proposed is not possible on safety or economic grounds. In many cases, geotechnical investigations will be required prior to an application being determined.

That the Council recommend to the Planning Inspector that the second sentence of paragraph 7.10 be amended to read:

Where development is proposed on sites known, or suspected to be contaminated, or where the site is in the vicinity of a former landfill site, the developer will be required to carry out a risk assessment *at the planning application stage.*

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM2 Design and Placemaking (Paragraphs 7.18-7.23)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
20D.366	Public Health Wales (PHW)		In terms of new residential developments, consideration should be given on how to resolve any conflict between 'secured by design' principles and those encouraging active travel.
21D.373	GVA for Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Unsound (C2)	Criterion a. is unduly restrictive and could potentially have the adverse impact of stifling innovative design.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
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Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Resolve conflict between 'secured by design' principles and those encouraging active travel (PHW)
- Criterion a. is unduly restrictive and could stifle innovative design (GVA)

Desired Changes to LDP

- The change is not clearly stated (PHW)
- Amend Policy DM2 to include reference to the acceptability of modern and contemporary development proposals in order that a full range of well designed buildings are supported (GVA)

COUNCIL RESPONSE

Council Analysis

- **Resolve conflict between 'secured by design' principles and those encouraging active travel (PHW)**
- Noted.** The Council has produced detailed guidance in the form of

Supplementary Planning Guidance on Householder Development. One of the key objectives of this guidance is to ensure that the pattern of accessibility and ease of movement is designed hand in hand with measures to reduce crime and create safe and secure streets, spaces and buildings. The guidance also encourages early consultation and engagement between stakeholders, the local planning authority and the community to overcome conflicts of interest. A link to this guidance is contained in paragraph 7.20 of the deposit Plan. **No change is required.**

- **Criterion a. is unduly restrictive and could stifle innovative design (GVA)**

To meet test of soundness C2, GVA consider that there is scope to make Policy DM2 more proactive with a view to encouraging contemporary and cutting edge design proposals that help to deliver landmark developments.

Agree. There are opportunities for the design of a new development to improve existing areas of poor design and layout. For clarity it is considered more appropriate to amend criterion b. of policy DM2.

Amend criterion b. to read:

They are of good design which reinforces local character and distinctiveness of the area *or improves areas of poor design and layout*

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Criterion b. of Policy DM2 is amended to read:

They are of good design which reinforces local character and distinctiveness of the area *or improves areas of poor design and layout*

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM3 Air and Water Pollution (Paragraphs 7.24-7.29)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Support /Object	Comment
10D.227	Countryside Council for Wales (CCW)	Sound (C2)	Supports the policy, and considers that it meets Test of Soundness C2.
18D.82	Environment Agency (EA)	Unsound (CE1, CE2)	The Deposit Plan's policies contain no reference to improving water quality. The policy provisions are limited to protection only, which implies Blaenau Gwent is only aiming to maintain the status quo.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Supports Policy DM3 (CCW)
- Include reference to improving water quality (EA)

Desired Changes to LDP

- Policy DM3 should be amended to incorporate provisions of the improvement of water quality within Blaenau Gwent, taking into account the current water bodies failures and the likely reasons for these failures. (EA)

COUNCIL RESPONSE

Council Analysis

- **Supports Policy DM3 (CCW)**

Support welcomed.

- **Include reference to improving water quality (EA)**

Agree. Reference to improving water quality should be included in the Plan.

Amend criterion a to read:

They *improve water quality* or do not have an adverse impact upon the water environment or pose an unacceptable risk to the quality of controlled waters (including groundwater and surface water); and

Amend paragraph 7.24 to read:

.... Framework Directive due to sewer overflows, ~~and~~ pollution from industrial estates and old mines *and issues with fish migration*.

Amend paragraph 7.25 to read:

Development will only be allowed where adequate provision is made for the necessary infrastructure to protect *and where appropriate improve* water quality and quantity. Consideration will be given to the quality and quantity of the water resource and how this impacts upon the wider environment in terms of *improving fish migration through removal of obstructions*, preventing further deterioration of aquatic ecosystems associated habitats, fisheries, promoting the sustainable use of water and controlling water abstractions.

Amend cross reference to refer to Policy SP10.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy DM3 Criterion a be amended as follows:

Development proposals will be permitted where:

- a. They do not have an adverse impact upon the water environment or pose an unacceptable risk to the quality of controlled waters (including groundwater and surface water); and
- b. *They contribute to improving water quality wherever practicable; and*
- c. They do not result in airborne emissions which have an unacceptable effect on the health, amenity or natural environment of the surrounding

area, taking into account cumulative effects of other proposed or existing sources of air pollution in the vicinity.

That the Council recommend to the Planning Inspector that Paragraph 7.24 and 7.25 be amended as follows:

The EU Water Framework Directive (2000/60/EC) establishes a strategic approach to water management and a common means of protecting and setting environmental objectives for all ground waters and surface waters. It aims to protect and restore clean water and ensure its long-term sustainable use. National planning policy emphasises that planning controls should be used to ensure incompatible uses of land are separated, in order to avoid potential conflict between different types of development. At present the County Borough's rivers and groundwater are failing to reach the 'Good Status' required by the Water Framework Directive due to sewer overflows, *and* pollution from industrial estates and old mines *and issues with fish migration*. The Council is proactively working to help clean, protect and preserve Blaenau Gwent's rivers through a number of environmental projects.

Development will only be allowed where adequate provision is made for the necessary infrastructure to *protect secure the protection* of water quality and quantity *and, wherever practicable, improve water quality*. Consideration will be given to the quality and quantity of the water resource and how this impacts upon the wider environment in terms of *improving fish migration through removal of obstructions*, preventing further deterioration of aquatic ecosystems associated habitats, fisheries, promoting the sustainable use of water and controlling water abstractions. Planning permission may be granted subject to conditions to secure the necessary measures, or developers may be required to enter into Planning Obligations. Applications that cannot provide adequate protection of watercourses, ground and surface water will be refused.

That the Council recommend to the Planning Inspector that *the reference box* be amended to refer to Policy SP10.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would improve the soundness of the plan.

Policy: DM4 Infrastructure Provision (Paragraphs 7.30-7.38)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.128	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Further clarification is required in relation to CIL and what will be in place in 2014.
3D.406	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Whilst it is unreasonable to review delivery through existing commitments, there needs to be a statement within the Plan that this is the case for renewal applications.
10D.228	Countryside Council for Wales (CCW)	Sound (C2)	Full support for DM4.
24D.102	Home Builders Federation (HBF)	Unsound (CE2, CE3, CE4)	Concerned with the affordable housing target of 10%: the assumption of £2,500 for other developer contributions has considerably underestimated; and the construction costs differ to those provided the District Valuer.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Further clarification is required in relation to CIL and what will be in place in 2014 (WG)

- Clarify position for renewal applications (WG)
- Support for DM4 (CCW)
- Concerned with the affordable housing target of 10%, developer contribution has been underestimated and construction costs differ to the district valuer (HBF)

Desired Changes to LDP

- Further clarification is required in relation to CIL and what will be in place in 2014 (WG)
- Include a statement that any renewal applications would be considered under the plan's policy requirements (WG)
- Change not clearly stated (HBF)

COUNCIL RESPONSE

Council Analysis

- **Further clarification is required in relation to CIL and what will be in place in 2014 (WG)**

Agree. In April 2014 the CIL Regulations (2010) will limit the ability of the local authority to require the provision of infrastructure and facilities generated by new development to be sought through planning obligations. The authority will undertake an infrastructure planning exercise to determine if it is appropriate for a CIL Charging Schedule to be adopted. One of the main factors influencing this decision is likely to be the need to ascertain how the introduction of a Charging Schedule will impact upon the viability of development, which must be balanced against the regeneration benefits of new development. It is anticipated that this issue may be finely balanced in Blaenau Gwent, due to the existing known barriers to regeneration, and may result in the decision to set a nominal CIL Rate or no CIL Rate. The decision to adopt a CIL Charging Schedule should however not be pre-empted before evidence on infrastructure and costs have been thoroughly examined.

It is recommended that paragraph 7.32 is amended as follows:

The Community Infrastructure Levy (CIL) is a new charge which local authorities in England and Wales are empowered, but not required, to levy on most types of new development in their areas. The proceeds of the levy will provide new local and sub-regional infrastructure to support the development of an area in line with local authorities' development plans. Although no formal decision has yet been taken by Blaenau Gwent, *it is anticipated that this issue may be finely balanced, due to the existing known barriers to regeneration, and may result in the decision to set a nominal CIL rate or no CIL Rate. it is likely that the CIL will be adopted in the future. At this point the infrastructure covered by CIL will no longer be sought via planning obligations. However, planning obligations will remain in place to secure Affordable Housing and localized site-based requirements.*

- **Clarify position for renewal applications (WG)**

Agree. Renewal applications will be subject to Policy DM4 in the same way as applications for other types of development. Where the requirements of Policy DM4 would impact on the viability of the development it will be subject to an independent financial appraisal to determine whether or not the development can support the provision of planning obligations for community facilities/infrastructure or commuted sums. Where applications cannot support the provision of planning obligations on the grounds of viability this may form the basis of a decision to approve the development without or with reduced planning obligations. In the case of renewal applications and other applications that would result in a development taking place that is in the public interest (e.g. the clean up of a contaminated site) the issue of development viability would be a key issue in determining the planning application. It is considered that clarity on the issue of renewal applications and planning obligations should be addressed with a reference in the supporting text to the policy.

It is recommended that paragraph 7.36 is amended as follows:

In the case of renewal and ~~On~~ windfall sites applications the range of requirements sought in relation to development proposals will be determined on a case by case basis, taking into account the location and nature of the development and the local infrastructure on which it would impact. Individual Council Departments will elaborate on their requirements as part of the planning application process. The level of provision required will be supported by a robust evidence base according to the capacity of existing facilities and the priorities of the relevant Department at any given time and do not therefore form part of the LDP.

- **Support for DM4 (CCW)**

Support welcomed.

- **Concerned with the affordable housing target of 10%, developer contribution has been underestimated and construction costs differ to the district valuer (HBF)**

Disagree. TAN2, paragraph 9.1, states that, in relation to setting the affordable housing target, *'The target should take account of the anticipated level of finance available for affordable housing, including public subsidy, and the level of developer contributions that can realistically be sought.'* The affordable housing target seeks a minimum of 10% affordable housing on development sites of 10 dwellings and above and has been set following the recommendations in the Affordable Housing Viability Study (AHVS) undertaken by the District Valuer, which forms part of the evidence base to the draft deposit LDP.

It was originally agreed at the outset of the AHVS that planning obligations (additional to affordable housing) would be tested at a rate of £4,000 per dwelling. However, following the Study analysis, and in view of the fact the study must be based on current circumstances, it was decided that the most appropriate option was to take an average of all the S106 requirements that had recently been required up to the date of the Study, and to round this

figure up to its next reasonable interval of £2,500 per dwelling (which also accords with the established Three Dragons Guidance).

Whilst there remains the potential for a development to generate a wide range of planning obligations which, in theory, could far exceed the £2,500 per dwelling figure, the evidence of recent planning obligation requirements in Blaenau Gwent on a range of different development sites demonstrates that this is not occurring. The £2,500 per dwelling figure is considered to be representative of the typical planning obligation liabilities that may be imposed on an average development in Blaenau Gwent and is therefore considered to be pitched at a realistic level. The affordable housing target is therefore considered to have been based on sound assumptions.

In the event that a development does exceed the average planning obligations figure and the viability of the development is threatened by the level of planning obligations sought, the Council has an established viability appraisal process with which to evaluate the level of planning obligations that would be reasonable. This process does not undermine the average planning obligations figure included in the AHVS or the affordable housing target, but serves to recognise that the viability of individual developments can differ on a case by case basis and should be assessed accordingly.

The construction costs used by the District Valuer are based on RICS Build Cost Information Service (BCIS). The issue with the figures being lower was raised at the Viability Assessment Workshop when the District Valuer explained that additional build costs are added later on and this would bring the figures up to similar levels to the Three Dragons model figures.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Paragraph 7.32 be amended as follows:

The Community Infrastructure Levy (CIL) is a new charge which local authorities in England and Wales are empowered, but not required, to levy on most types of new development in their areas. The proceeds of the levy will provide new local and sub-regional infrastructure to support the development of an area in line with local authorities' development plans. Although no formal decision has yet been taken by Blaenau Gwent, *it is anticipated that this issue may be finely balanced, due to the existing known barriers to regeneration, and may result in the decision to set a nominal CIL rate or no CIL Rate. it is likely that the CIL will be adopted in the future. At this point the infrastructure covered by CIL will no longer be sought via planning obligations.*

~~However, planning obligations will remain in place to secure Affordable Housing and localized site-based requirements.~~

That the Council recommend to the Planning Inspector that Paragraph 7.36 be amended as follows:

~~In the case of renewal and~~ ~~On~~ windfall sites applications the range of requirements sought in relation to development proposals will be determined on a case by case basis, taking into account the location and nature of the development and the local infrastructure on which it would impact. Individual Council Departments will elaborate on their requirements as part of the planning application process. The level of provision required will be supported by a robust evidence base according to the capacity of existing facilities and the priorities of the relevant Department at any given time and do not therefore form part of the LDP.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM5 Low and Zero Carbon Energy (Paragraph 7.39 – 7.45)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.229	Countryside Council for Wales (CCW)	Sound (C2)	Supports policy DM5.
82D.397	Six Bells Communities First (SBCF)		Supports the development of low and zero carbon energy and hence policy DM5.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issue identified in the representation is as follows:

- Support for DM5 (CCW and SBCF)

COUNCIL RESPONSE

Council Analysis

- **Support for DM5** (CCW) (SBCF)
Support welcomed.

Policy: DM6 Use Class Restrictions in Principal and District Town Centres (Paragraph 7.46 - 7.53)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Support /Object	Comment
20D.368	Public Health Wales (PHW)	Sound	Supports Policy DM6, although consideration should be given to restricting the proximity of food and drink retail outlets to schools to support the efforts to promote healthier eating and reduce obesity in children.
34D.118	Mrs P Davies		Welcomes the limitations to hot food takeaways and hopes it will be enforced.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Restriction of the proximity of the number of food and drink outlets to schools (PHW)
- Supports the limitations to hot food takeaways (Mrs P Davies)

Desired Changes to LDP

- The change is not clearly stated (PHW)

COUNCIL RESPONSE

Council Analysis

- **Restriction of the proximity of the number of food and drink outlets to schools (PHW)**

Support for policy DM6 is welcomed. However, to restrict the proximity of the number of food and drink outlets to schools has not been identified as a major issue for the local development plan. Policy DM6 encourages a range of uses and considers that town centres are the most appropriate location for food and drink outlets, although the number and concentration of these uses should not

dominate a town centre.

Policy DM1 covers the potential adverse impacts which could arise from a development itself and conversely, the adverse effects which could occur as a result of the inappropriate location of new development. In addition, as stated in Planning Policy Wales (2011) health considerations can be material considerations in determining applications for planning permission. Therefore the addition of a further control is considered unnecessary.

- **Supports the limitations to hot food takeaways** (Mrs P Davies)
Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: DM7 Use Class Restrictions in Blaina Local Town Centre (Paragraphs 7.54 – 7.58)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
47D.369	Nantyglo & Blaina Town Council (NBTC)	Unsound (C4, CE1)	Objects to criterion b of DM7, on the grounds that Blaina will be at a distinct disadvantage to other towns; and will transfer the only shopping centre with a record level of growth into an irregular retail pattern leading to its eventual collapse.
47D.407	Nantyglo & Blaina Town Council (NBTC)	Unsound (C4, CE1)	Objects that no primary retail area has been identified for Blaina Local Town Centre.
71D.343	Mr G Collier	Unsound (CE2)	Objects to policy DM7 (criterion b) as no residential development should be permitted within Blaina Local Town Centre.
78D.344	Blaina Communities First (BCF)		Objects to policy DM7 as allowing change of use to residential within the Blaina Local Town Centre will undermine the centre. Also questions how would "genuine efforts to market the premises" be determined?

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:
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- Objects to allowing residential development within Blaina town centre (Mr G Collier) (BCF) (NBTC)
- Objects that no primary retail area has been identified for Blaina Local Town Centre (NBTC)

Desired Changes to LDP

- Criterion b of DM7 allowing the change of use from retail to residential at the ground floor should be withdrawn (NBTC)
- Identify a primary retail area for Blaina town centre (NBTC)
- Criterion b of policy DM7 should be deleted and replaced with: " Within the local town centre, the change of use of the ground floor unit to residential use will not be permitted" (Mr G Collier)
- The change is not clearly stated (BCF)

COUNCIL RESPONSE

Council Analysis

- **Objects to allowing residential development within Blaina town centre** (Mr G Collier) (BCF) (NBTC)

The representations object to allowing residential development within Blaina town centre. Nantyglo and Blaina Town Council argue that this will place the High Street at a distinct disadvantage to other towns and over time will transfer the only shopping centre with a record of growth within Blaenau Gwent into an irregular pattern leading to the eventual collapse of the local economy of the High Street. Blaina Communities First also questions how genuine efforts to market the premises would be determined.

Disagree. The Retailing Background Paper sets out the evidence base for the approach taken on Blaina Local Town Centre. The town centre is a small town (61 properties) with a high vacancy rate of nearly 22% (July 2009). This vacancy rate increased further in July 2010 to reach 29.5% and although declining slightly in July 2011 to 24.6% a quarter of all properties in Blaina are vacant.

It is accepted that between 2006 and 2009 there was a slight increase (of 7%, 4 units) in the percentage of A1 uses in Blaina town centre whilst the other town centres have declined marginally. However, in July 2011 it was recorded that Blaina town centre has experienced a 5% loss in the number of A1 units compared to the July 2010 survey results. An update of the Retailing Background Paper (2011) sets out the results of the latest town centre surveys.

It is clearly evident that there have been a number of vacant units within Blaina town centre which have failed to attract investment from the commercial sector. Hence in 2007 and 2008 planning permission was granted for the change of use of retail units to residential.

The purpose of criterion b is to ensure that there is flexibility to consider the appropriate reuse of redundant units and to allow them to convert back to residential use if there is no market or demand for a retail or commercial use. Vacant units can have a significant impact on the appearance and the amenity of an area and can harm the wider regeneration objectives.

It is essential that a balance is struck between ensuring the release of redundant retail premises and protecting retail units for their economic and social benefits. DM7 will ensure that redundant retail premises are released for alternative uses where it is demonstrated that they are genuinely redundant and no longer deliver wider benefits to the community.

With regard to the issue raised on marketing the premises, it is agreed that clarity is required on this matter. However, it is considered that this policy should not be overly prescriptive on this matter as the evidence submitted with a planning application needs to be considered on a case-by-case basis.

Criterion b of policy DM7 should be amended to read:

- b. In the case of a change of use to residential, the unit must have been vacant for a minimum of 12 months and/or genuine efforts have been made to market the premises *for retail / commercial use*.

Paragraph 7.58 should also be amended to read:

Planning applications for the change of use to residential would need to be supported by evidence of a 12 month history of vacancy and/or a lack of response to genuine efforts to market the premises *for retail / commercial use* over a significant period. *The Council will closely scrutinise the evidence put forward to demonstrate that the units are no longer required for retail purposes.*

• Objects that no primary retail area has been identified for Blaina Local Town Centre (NBTC)

Disagree. The Retailing Background Paper explains the rationale behind the formulation of primary retail areas in the town centres. As set out in Planning Policy Wales, primary retail areas are characterised by a high proportion of retail A1 uses. In July 2009 the record of A1 uses within Blaina Town Centre was 27% (17 units) which is significantly less than the other town centres where the average number of A1 units were 60. It is also important to note that in July 2011 it was recorded that Blaina town centre has experienced a 5% loss in the number of A1 units compared to the July 2010 survey results.

The purpose of a Primary Retail Area in the Local Development Plan is to protect the retail core of the town centres. The clustering of A1 uses is considered beneficial for the vitality, viability and attractiveness of the town centres. Within Blaina town centre, there is considered to be no clustering of A1 uses and hence no retail core as the A1 uses are located sporadically throughout the town centre amongst other types of uses.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Criterion b of policy DM7 should be amended to read:

- b. In the case of a change of use to residential, the unit must have been vacant for a minimum of 12 months and/or genuine efforts have been made to market the premises *for retail / commercial use*.

That the Council recommend to the Planning Inspector that Paragraph 7.58 should also be amended to read:

Planning applications for the change of use to residential would need to be supported by evidence of a 12 month history of vacancy and/or a lack of response to genuine efforts to market the premises for *retail / commercial use* over a significant period. *The Council will closely scrutinise the evidence put forward to demonstrate that the units are no longer required for retail purposes.*

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM8 Affordable Housing (Paragraphs 7.59-7.63)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.135	Welsh Government (WG)	Unsound (C2, CE1, CE2)	For consistency and clarity the policy should read 'at least' 10%.
3D.136	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The Viability Assessment identifies that sites of over 100 units should contribute 15% affordable housing. Not clear why housing background paper only refers to one site. It is noted that one existing allocation is contributing 20%.
3D.137	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The plan should clarify the position with regard to commuted sums in order to optimise affordable housing delivery and the number of units that can be delivered through S106 agreements.
19D.97	DPP acting for Newbridge Construction Ltd (DPP)	Sound	Supports the 10% requirement across the MU1 site.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Clarify position on commuted sums (WG) • Clarify percentage to be sought on large sites (WG) • Amend paragraph 7.61 to read at least (WG)

- Support for 10% on MU1 (DPP)

Desired Changes to LDP

- Change not clearly stated (WG)
- Change not clearly stated (WG)
- Change not clearly stated (WG)

COUNCIL RESPONSE

Council Analysis

- **Clarify position on commuted sums (WG)**

Agree. Add the following sentence at end of paragraph 7.62:

For instance, where the application of the 10% requirement would create 'part' of an affordable dwelling. The Council will expect the whole dwelling to be provided on site and the 'partial dwelling' to be provided via a developer contribution in-lieu of in-site provision. It may also occur where on-site provision is not considered appropriate and off site units cannot be delivered as an alternative site is not available.

- **Clarify percentage to be sought on large sites (WG)**

Agree. It is agreed that a higher percentage may be supported on sites over 100 units but it is considered that this is sufficiently covered in the policy through the reference to 'at least' 10% and in the Planning Obligations SPG. However, it is accepted that the position in terms of the percentage to be sought should be clarified in paragraph 7.61.

The Housing Background Paper has been updated to address the confusion on how many sites in the Plan are over 100 units.

Amend paragraph 7.61 by the inclusion of the following sentence:

The percentage is by definition a minimum threshold and a higher percentage of affordable housing provision will be sought where the development can support it.

- **Amend paragraph 7.61 to read 'at least' (WG)**

Agree. Amend paragraph 7.61 as follows:

...the provision of at least 10% affordable housing on residential units of 10 and over or sites that exceed 0.28 hectares in size (gross site area).

- **Support for 10% on MU1 (DPP)**

Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Paragraph 7.61 be amended as follows:

To ensure the delivery of affordable housing in accordance with the identified need, the Council will seek the provision of *at least* 10% affordable housing on sites of 10 residential units and over or sites that exceed 0.28 hectares in size (gross site area). *The percentage is by definition a minimum threshold and a higher percentage of affordable housing provision will be sought where the development can support it.* When adjacent sites taken together exceed these thresholds affordable housing will be sought.

That the Council recommend to the Planning Inspector that Paragraph 7.62 be amended as follows:

The Council's Empty Property Strategy identifies over 200 properties that are long term vacant. These properties can have a significant adverse impact on the character and appearance of a settlement. In order to address this issue and increase the overall provision of affordable homes the Council will, in certain circumstances, seek financial contributions from developers. *For instance, where the application of the 10% requirement would create 'part' of an affordable dwelling. The Council will expect the whole dwelling to be provided on site and the 'partial dwelling' to be provided via a developer contribution in-lieu of on-site provision. It may also occur where on-site provision is not considered appropriate and off site units cannot be delivered as an alternative site is not available.*

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM9 Rural Exception Sites (Paragraphs 7.64-7.65)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.156	Welsh Government (WG)		The policy title should be amended to accord with Planning Policy Wales, e.g. 'affordable housing' exception sites.
10D.231	Countryside Council for Wales (CCW)	Sound (C2)	Supports Policy DM9 in principle, and considers that it meets Test of Soundness C2.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Amend policy title (WG)
- Support DM9 (CCW)

Desired Changes to LDP

- Amend title of policy to Affordable Housing Exception Sites (WG)

COUNCIL RESPONSE

Council Analysis

- **Amend policy title (WG)**
Agree. Amend title of policy DM9 to read:
DM9 *Affordable Housing* Exception Sites
(This change has consequential changes to paragraph 7.64)
- **Support DM9 (CCW)**
Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the title of Policy DM9 be amended as follows:

DM9 *Affordable Housing Rural* Exception Sites

That the Council recommend to the Planning Inspector that Paragraph 7.64 be amended as follows:

The purpose of the *Rural Affordable Housing* Exception Policy is to release sites for affordable housing where there is a shortage of available sites to meet need. *Rural Exception* sites for affordable housing will only be appropriate where there is a genuine local need for affordable housing within the settlement in question and where the need cannot be met on an alternative site. The Council will require a legal agreement restricting the occupancy of dwellings to local people in need of affordable housing. Further advice on this is contained in Supplementary Planning Guidance on Planning Obligations.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM10 Sites for Gypsies and Travellers (Paragraph 7.66)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.139	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The policy should more clearly apply to 'Caravan' Sites for Gypsies and Travellers.
3D.140	Welsh Government (WG)	Unsound (C2, CE1, CE2)	Interpretation of provision contained in criteria (b) and (e) relating to "appropriately screened" / "adequately screened" / "well defined boundaries" could be questionable given the point made in WAG Circular 30/2007 at paragraph 25.
10D.232	Countryside Council for Wales (CCW)	Sound (C2)	Supports the policy in principle, and considers that it meets Test of Soundness C2.
82D.398	Six Bells Communities First (SBCF)		Whilst the former colliery site has not been identified for a gypsy traveller site, the representation seeks to register its objections to any such development in the future.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • The policy should more clearly apply to 'caravan' sites (WG) • Issue with reference to boundaries (WG)

- Support for DM10 (CCW)
- Objects to possibility of Six Bells Colliery Site being considered (SBCF)

Desired Changes to LDP

- Include the word 'Caravan' (WG)
- Change not clearly stated (WG)
- Change not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **The policy should more clearly apply to 'caravan' sites (WG)**
Agree. Include the word Caravan in the Policy title as follows:
DM10 *Caravan* Sites for Gypsies and Travellers
- **Issue with reference to boundaries (WG)**
Agree. Delete criteria e and amend criteria b to read as follows:
Adequate landscaping and planting with appropriate trees and shrubs helps the site blend into its surroundings;
- **Support for DM10 (CCW)**
Support welcomed.
- **Objects to possibility of Six Bells Colliery Site being considered (SBCF)**
No need has been identified in the Plan for a new site as current demand can be met through an extension to the existing site.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy DM10 be amended as follows:

DM10 *Caravan* Sites for Gypsies and Travellers

New sites will be permitted where:

- The site is well related to community facilities and services;
- ~~The site is already appropriately screened or capable of being~~

~~adequately screened and landscaped~~ Adequate landscaping and planting with appropriate trees and shrubs helps the site blend into its surroundings;

- c. The site is capable of being provided with foul and surface water drainage, including appropriate infrastructure and facilities to manage wastes;
- d. The site can accommodate residential and home-based business uses without detriment to the amenity and character of the area; **and**
- e. ~~The site has well defined boundaries; and~~
- f.e In the case of a transit or touring site, it has good access to the primary highway network.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM11 Use Class Restrictions – Employment (Paragraphs 7.67-7.71)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.233	Countryside Council for Wales (CCW)	Sound (CE1)	Supports Policy DM11 in principle.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issue identified in the representation is as follows:

- Support for Policy DM11 (CCW)

COUNCIL RESPONSE

Council Analysis

- **Support for Policy DM11 (CCW)**

Support welcomed.

**Policy: DM12 Protection of Community and Leisure Facilities
(Paragraphs 7.72-7.73)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Support /Object	Comment
10D.234	Countryside Council for Wales (CCW)	Support	Supports Policy DM12 in principle, and considers that it meets Test of Soundness C2.
82D.399	Six Bells Community First (SBCF)		Requests that the former Colliery site is officially recognised as a unique area which provides both community and leisure facilities. The site has already developed walkway, planting and cycle tracks.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for DM12 (CCW)
- Former colliery site should be recognised as a unique area which provides both community and leisure facilities (SBCF)

Desired Changes to LDP

- The change is not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Support for DM12 (CCW)**

Support welcomed.

- **Former colliery site should be recognised as a unique area which provides both community and leisure facilities (SBCF)**

It is unclear what the representor means by official recognition of the former Six Bells site as a unique area which provides both community and leisure facilities. The Plan does not identify community and leisure facilities protected by this policy.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: DM13 Provision for Open Space, Recreation and Leisure Facilities (Paragraphs 7.74-7.79)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Support /Object	Comment
10D.235	Countryside Council for Wales (CCW)	Sound (CE1)	Supports Policy DM13 in principle, and considers that it meets Test of Soundness CE1.
24D.48	Home Builders Federation (HBF)	Unsound (C2, CE2)	Policy DM13 is based on FIT standards and does not reflect local standards which should be established from undertaking an appropriate open space assessment.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Supports Policy DM13 (CCW)
- Policy should be based on local standards established through an open space assessment (HBF)

Desired Changes to LDP

- Use local standards of provision rather than relying on generic FIT standards (HBF)

COUNCIL RESPONSE

Council Analysis

- **Support Policy DM13 (CCW)**
Support welcomed.
- **Policy should be based on local standards established through an**

open space assessment (HBF)

Disagree. The Council has undertaken an open space assessment. Whilst it is accepted that the current standard achieved is lower than the recognised Fields in Trust standard of 2.4 this remains the standard the council is working towards.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan

Policy: DM14 Protection of Open Space (Paragraph 7.80)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.237	Countryside Council for Wales (CCW)	Sound (C2)	Supports Policy DM14 in principle, and considers that it meets Test of Soundness C2.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Supports for DM14 (CCW)

COUNCIL RESPONSE

Council Analysis

- **Support for DM14 (CCW)**
Support welcomed.

**Policy: DM15 Biodiversity Protection and Enhancement
(Paragraphs 7.81- 7.84)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound /Unsound	Comment
3D.149	Welsh Government (WG)	Unsound (CE2, CE3,CE4)	The justification should be sufficiently clear to enable identification of the sites the policy relates to.
10D.239	Countryside Council for Wales (CCW)	Unsound (CE1)	Generally supports policy DM15 but recommends that, in line with paragraph 3.2.3 of TAN 5, the policy should clarify how proposals likely to result in disturbance or harm to legally protected species and their habitat will be assessed to meet Test of Soundness CE1.
10D.242	Countryside Council for Wales (CCW)	Unsound (CE1)	For improved clarity amend paragraph 7.82 to meet Test of Soundness CE1.
19D.19	DPP for Newbridge Construction Ltd (DPP)		Suggests rewording of DM15 to ensure it sits comfortably alongside the thrust of paragraph 7.3.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Unable to Identify sites that policy relates to (WG) • Should clarify how proposals likely to result in disturbance or harm to

- legally protected species and their habitat will be assessed (CCW)
- Amend paragraph 7.82 for clarity (CCW)
- Amend criterion a to ensure it sits comfortably with paragraph 7.83 (DPP)

Desired Changes to LDP

- Identify sites that policy relates to (WG)
- Amend policy DM15 to clarify how proposals likely to result in disturbance or harm to legally protected species and their habitat will be assessed (CCW)
- The second sentence of paragraph 7.82 is amended by inserting at its start 'Proposals which are likely to have a significant effect on ' (CCW)
- Reword policy DM15 criterion a as follows:
'It maintains or enhances the ecological *function* or geological importance of the designation, or' (DPP)

COUNCIL RESPONSE

Council Analysis

- **Unable to Identify sites that policy relates to (WG)**
Disagree. Paragraph 7.82 states that international and national designations will be assessed in accordance with national planning policy. No examples of such sites are provided in the justification text and WG argues that these sites need to be identified. A similar argument was made by WG in respect of SP10, which has been amended to take the representation into account. It is considered that as examples of international and national sites are now included in SP10 then there is no need to repeat them in this policy as it would be repetition.
- **Should clarify how proposals likely to result in disturbance or harm to legally protected species and their habitat will be assessed (CCW)**
Agree. Criterion 2 should be amended to read as follows:
 2. 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 affect ecological corridors and Priority Habitats and Species, where either:
 - a. It maintains or enhances the ecological or geological importance of the designation *and species*, or
 - b. The need for the development outweighs the nature conservation importance of the site/*species* 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 development.
- **Amend paragraph 7.82 for clarity (CCW)**
Agree. The second sentence of paragraph 7.82 should be amended to read

Proposals which are likely to have a significant effect on international and national designated sites will be assessed in accordance with national planning policy.

- **Amend criterion a to ensure it sits comfortably with paragraph 7.83 (DPP)**

Disagree. It is considered that there is no need to amend the sentence as requested because the current wording is appropriate and in keeping with the purpose of the policy i.e. to maintain or enhance the biodiversity or geological interest of the respective site.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Criterion 2 should be amended to read as follows:

2. 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 affect ecological corridors and Priority Habitats and Species, where either:
 - a. It maintains or enhances the ecological or geological importance of the designation *and species*, or
 - b. The need for the development outweighs the nature conservation importance of the site/*species* 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 development.

That the Council recommend to the Planning Inspector that the second sentence in paragraph 7.82 be amended to read as follows:

Proposals which are likely to have a significant effect on international and national designated sites will be assessed in accordance with national planning policy.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM16 Protection and Enhancement of the Green Infrastructure (Paragraphs 7.85-7.89)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.243	Countryside Council for Wales (CCW)	Sound (CE1)	Welcomes and supports the policy.
10D.244	Countryside Council for Wales (CCW)		For improved clarity recommends that the final sentence of paragraph 7.86 is amended by inserting 'other' before SINCs.
82D.401	Six Bells Communities First (SBCF)		Supports the development of Green Infrastructure (Policy DM16) as a network of connected accessible multi functional sites including the former colliery site at Six Bells.
82D.402	Six Bells Communities First (SBCF)		Former colliery site at Six Bells and Guardian form a unique centrepiece of the Ebbw Fach trail which, it should be noted was actually a Six Bells Communities First development.
82D.403	Six Bells Communities First (SBCF)		Paragraph 7.89 explains that GI will be enhanced by creating new open spaces. SBCF outlines need to maintain and develop through careful planning existing open spaces such as the former colliery site at Six Bells.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for DM16 (CCW) (SBCF)
- Insert the word 'other' into paragraph 7.86 (CCW)
- Role of SBCF regarding Ebbw Fach Trail (SBCF)
- Need to maintain and develop existing open spaces (SBCF)

Desired Changes to LDP

- Insert 'other' before SINC's in final sentence of paragraph 7.86 (CCW)
- Change not clearly stated (SBCF)
- Change not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Support for DM16** (CCW) (SBCF)

Support welcomed.

- **Insert the word 'other' into paragraph 7.86** (CCW)

Agree. Insert 'other' before SINC's in final sentence of paragraph 7.86. This will help differentiate between river SINC's which form part of the Strategic Green Infrastructure and 'other' SINC's which are included within the Local Green infrastructure.

Amend paragraph 7.86 to include the word 'other'.

- **Role of SBCF regarding Ebbw Fach Trail** (SBCF)

Disagree. Paragraph 7.88 highlights that the Ebbw Fach Trail has improved connectivity through its linking of 13 community groups from Beaufort to Llanhilleth.

The representor explains that the former colliery site at Six Bells and Guardian form a unique centrepiece of the trail and suggests that it should be noted that the Ebbw Fach Trail was actually a Six Bells Communities First development. It is unclear whether the representor proposes that additional text should be added to paragraph 7.88 to reflect the role played by SBCF or whether it is a general comment. It is not considered necessary to add further text to the paragraph as the reference to the importance of the Ebbw Fach Trail in terms of the Green Infrastructure is sufficient.

- **Need to Maintain and develop existing open spaces** (SBCF)

Paragraph 7.89 explains that the GI will be enhanced by creating new open spaces. SBCF outlines need to maintain and develop through careful planning existing open spaces such as the former colliery site at Six Bells.

Noted. The importance of maintaining the Green Infrastructure is recognised and it will be maintained at the Six Bells site. The middle plateau will remain as open space with potential for further tourism development. It will continue to serve as an important green link both for people and in ecological terms.

Tests of Soundness

The Council considers that the LDP and associated documents have been

prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the final sentence in Policy DM16 paragraph 7.86 be amended as follows:

Below this strategic level there is Local GI such as cycle paths, informal open space, parks, *other* SINC's and nature reserves

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM17 Trees, Woodlands and Hedgerow Protection (Paragraphs 7.90-7.91)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.245	Countryside Council for Wales (CCW)	Sound (C2)	Supports Policy DM17 and considers that it meets Test of Soundness C2.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for DM17 (CCW)

COUNCIL RESPONSE

Council Analysis

- **Support for DM17 (CCW)**

Support welcomed.

**Policy: DM18 Buildings and Structures of Local Importance
(Paragraph 7.92)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.246	Countryside Council for Wales (CCW)	Sound (CE1)	Supports Policy DM18 and considers that it meets Test of Soundness CE1.
16D.25	Cllr John Morgan acting for Tredegar Town Council (Cllr J Morgan)		Sites and buildings should be conserved protected and restored. A register should be introduced for properties of local significance and importance.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for DM18 (CCW)
- Sites and buildings should be conserved, protected and restored –register introduced (Cllr J Morgan)

Desired Changes to LDP

- The change is not clearly stated (Cllr J Morgan)

COUNCIL RESPONSE

Council Analysis

- **Support for DM18 (CCW)**

Support welcomed.

- **Sites and buildings should be conserved, protected and restored – register introduced (Cllr J Morgan)**

The Representor states that sites and buildings should be conserved protected and restored. A register should be introduced for properties of local significance and importance, No buildings of local or national importance should be demolished but redeveloped with new uses found.

Noted. The aim of Policy DM18 Buildings and Structures of Local Importance is to protect such buildings that the Representor has identified i.e. those buildings and structures of significant local importance which are not statutorily listed by CADW and not currently afforded protection by law.

It is the intention that a list of buildings and structures of significant local importance will be compiled from visual surveys and consultation with local interest groups. Further information, including methodology to be used to assess whether a building or structure merits inclusion in the register will be available when Supplementary Planning Guidance is prepared.

Policy SP11 Protection and Enhancement of the Built Environment also makes reference to protection of buildings of local importance (see paragraph 6.69)

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: DM19 Criteria for Assessment of Mineral Applications
(Paragraphs 7.93-7.96)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.247	Countryside Council for Wales (CCW)	Sound (CE1)	Supports Policy DM19 in principle and considers that it meets Test of Soundness CE1.
10D.248	Countryside Council for Wales (CCW)	Unsound (CE1, C2)	Paragraph 52 of the Minerals Planning Policy Wales (2001) also identifies nature conservation as an appropriate after-use. This should be reflected in paragraph 7.96.
10D.249	Countryside Council for Wales (CCW)	Sound (C1)	Welcomes the clarification that the authority will favour the creation of landscapes which are characteristic of the area and priority habitats identified in the Local Biodiversity Action Plan.
46D.199	Brecon Beacons National Park Authority (BBNP)	Unsound (C1, C2)	Objects to criterion f) on the grounds that the reference to "sensitive landscapes" is not strong enough to allow adequate consideration of the likely impacts of an extension at Trefil Quarry on the National Park.
50D.49	The Coal Authority (CA)	Unsound (C2, CE4)	Objects to the treatment of energy and non-energy minerals in one policy as some criteria are applicable only to non-energy minerals.
82D.404	Six Bells Communities First (SBCF)		Whilst the former colliery site has not been identified as an area for potential mineral applications, the representation seeks to register an objection for any future applications in that it will adversely impact on the site, memorial, tourism.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for DM19 (CCW)
- Paragraph 7.96 to reflect nature conservation as appropriate after-use (CCW)
- Support for the creation of landscapes which are characteristic of the area (CCW)
- Criterion f needs to be strengthened (BBNP)
- Energy and non energy minerals need to be dealt with separately (CA)
- Register objection to future mineral application at Six Bells Colliery Site (SBCF)

Desired Changes to LDP

- Paragraph 7.96 be amended to also specify nature conservation as an appropriate after use (CCW)
- Amend criterion f to read: Adverse impact on 'sensitive or protected landscapes' can be minimised (BBNP)
- Add to the beginning of criterion a "For non-energy minerals..." Add to the beginning of criterion b "Where appropriate." (CA)
- Change not clearly stated (SBCF)

COUNCIL RESPONSE

Council Analysis

- **Support for DM19 (CCW)**

Support welcomed.

- **Paragraph 7.96 to reflect nature conservation as appropriate after-use (CCW)**

Agree. Include in paragraph 7.96 reference to 'nature conservation':

Restoration proposals...open space, recreation, *nature conservation* or other development.

- **Support for the creation of landscapes which are characteristic of the area (CCW)**

Support welcomed.

- **Criterion f needs to be strengthened (BBNP)**

Disagree. The use of the word sensitive is considered to cover protected landscapes.

- **Energy and non energy minerals need to be dealt with separately (CA)**

Agree. The policy needs to take into account the different policy requirements for energy and non-energy minerals.

- a. *For non-energy minerals* a proven need has been established for the material involved, either in a local, regional or national context;
- b. *Where appropriate* an assessment has been made that demonstrates that it would not be feasible to supply the mineral from secondary sources;

- **Register objection to future mineral application at Six Bells Colliery Site (SBCF)**

This is a criteria based policy which will be used to judge applications it is not possible to give guarantees whether a scheme would be acceptable without the level of detail required at planning application stage.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy DM19 criteria a and b be amended as follows:

Proposals for mineral extraction and associated development, including the tipping of mineral waste and the reworking of tips, will be permitted where:

- a. *For non-energy minerals* a A proven need has been established for the

- material involved, either in a local, regional or national context;
- b. *Where appropriate*, an assessment has been made that demonstrates that it would not be feasible to supply the mineral from secondary sources;

That the Council recommend to the Planning Inspector that Paragraph 7.96 be amended as follows:

Restoration proposals should be phased to commence as early as possible. The authority will, where appropriate, encourage progressive restoration at the earliest opportunity. After-uses may include agriculture, forestry/woodland, public open space, recreation, *nature conservation* or other development. They should favour the creation of landscapes which are characteristic of the area and priority habitats identified in the Local Biodiversity Action Plan.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM20 Mineral Safeguarding (Paragraphs 7.97-7.98)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.141	Welsh Government (WG)	Unsound (C2, CE1, CE2)	The criteria to policy DM20 are given as alternative scenarios by the link word 'or', however, criterion b requires an overriding need for the proposed development, whereas criterion c does not. Define overriding need - if retaining.
10D.250	Countryside Council for Wales (CCW)	Sound (C2)	Supports Policy DM20 in principle, and welcomes the clarification in paragraph 7.97 that safeguarding does not necessarily indicate an acceptance of working (meeting Test of Soundness C2).
45D.56	Confederation of UK Coal (Coal Pro)	Unsound (C2)	The tertiary coal resource should be safeguarded. The Coal Authority resource maps should be used to determine the resources to be safeguarded. Coal resources in designated areas should also be safeguarded.
50D.50	The Coal Authority (CA)	Sound	Supports the broad approach towards the safeguarding of surface coal resources and the encouragement of prior extraction in line with MTAN2. Supports the approach to safeguarding up to the settlement boundary.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Clarification of overriding need (WG)
- Support for DM 20 and reference in paragraph 7.97 to safeguarding not necessarily indicates acceptance of working (CCW)
- Issues with extent of Safeguarding Areas (Coal Pro)
- Support for broad approach towards safeguarding (CA)

Desired Changes to LDP

- Redraft to remove this anomaly (WG)
- Change not specified (Coal Pro)

COUNCIL RESPONSE

Council Analysis

- **Clarification of overriding need (WG)**

Agree. At present there is an anomaly which needs to be removed, to accord with MTAN2 paragraph 39.

Amend DM20 by the deletion of criterion b.

- **Support for DM20 and reference in paragraph 7.97 to safeguarding not necessarily indicates acceptance of working (CCW)**

Support welcomed.

- **Issues with extent of Safeguarding Areas (Coal Pro)**

This is more appropriately dealt with under Chapter 8.0 Policy M1 Safeguarding of Minerals.

- **Support for broad approach towards safeguarding (CA)**

Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy DM20 be amended as follows:

Development proposals will not be permitted where they would permanently sterilise important mineral resources within Aggregate and Coal Safeguarding Areas identified on the Proposals map unless:-

- a. The mineral resource is recovered before development commences; or
- ~~b. *There is an overriding need for the development and prior extraction cannot reasonably be undertaken; or*~~
- c. The developer satisfactorily demonstrates that the extraction of the mineral is impracticable, uneconomic or environmentally unacceptable; or
- d. The scale and location of the development would have no significant impact on the possible working of the resource: or
- e. It is temporary development and can be implemented and the site restored within the timescale the mineral is likely to be required.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: DM21 Waste (Paragraphs 7.99-7.101)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.251	Countryside Council for Wales (CCW)	Unsound (CE1)	Recommends that criterion 6(a) is amended by replacing "alternative transport modes" with "sustainable transport modes" (to meet Test of soundness CE1).
18D.182	Environment Agency (EA)		Reference to "landfill" in the context of activities 'likely to be suitable on farms as part of farm diversification' in terms of national policy needs to be checked and clarified.
18D.186	Environment Agency (EA)		Further explanatory text is required in relation to parts 6) d and e of the policy. The additional text should promote the benefits of CHP schemes and highlight the location of the proposed installation.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Summary of Key Issues

<p>The key issues identified in the representation(s) are as follows:</p> <ul style="list-style-type: none"> • Criterion 6a should refer to sustainable transport modes (CCW) • Reference to national policy needs to be checked in terms of landfill (EA) • Further clarification in reasoned justification on Criteria 6 d and e (EA)
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Desired Changes to LDP

- Amend criterion 6(a) by replacing "alternative transport modes" with "sustainable transport modes" (CCW)
- Change not clearly stated (EA)
- Change not clearly stated (EA)

COUNCIL RESPONSE

Council Analysis

- **Criterion 6a should refer to sustainable transport modes (CCW)**
Agree. Replace the word 'alternative' with 'sustainable' in Criterion 6a
In the case of regional scale facilities, its location relates closely to and benefits from an easy access to key transport corridors and, where practicable makes use of *alternative sustainable* transport modes;
- **Reference to national policy needs to be checked in terms of landfill (EA)**
Disagree. The reference to national policy relates to a Policy Clarification Note 04/04 on Waste Policies.
- **Further clarification in reasoned justification of Criteria 6 d and e (EA)**
Disagree. In the interests of a slimmer plan the reasoned justification is limited to waste and recycling matters. Issues around energy from waste have been covered by policy DM5. However, it is accepted that a cross reference to SP7 would be helpful.
Agree to include a cross reference to Policy SP7.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy DM21 criterion 6a be amended as follows:

6. The following criteria are also met:
 - a. In the case of regional scale facilities, its location relates closely to and benefits from an easy access to key transport corridors and, where practicable makes use of *alternative sustainable* transport modes;

That the Council recommend to the Planning Inspector that a cross reference is made to SP7

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy Omissions

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.252	Countryside Council for Wales (CCW)	Unsound (CE1)	The plan contains no policies on landscape protection and enhancement; Historic landscape, or developments in proximity to the BBNP and no logical flow from the plan's vision through to its policies, or recognition of cross boundary issues.
80D.312	Ian Roberts Consultancy on behalf of Mr Idris Watkins (Mr I Roberts)	Unsound (C2)	Regard has not been given to home/work units as identified in PPW and TAN 6. TAN 6 states "Development Plans should identify new opportunities for home/work development" which has not been addressed in the Deposit Plan.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- No policies on landscape protection and enhancement; Historic landscape, or developments in proximity to BBNP (CCW)
- Objects to lack of regard to home/work units (Mr I Roberts)

Desired Changes to LDP

- Add policy on landscape protection and enhancement; historic landscape, or developments in proximity to BBNP (CCW)
- Address a policy regarding home/work development for the whole of the borough (Mr I Roberts)

COUNCIL RESPONSE

Council Analysis

- **No policies on landscape protection and enhancement; historic landscape, or developments in proximity to BBNP (CCW)**

Disagree. There is already a policy in the LDP which deals with the protection and enhancement of the Natural Environment. This covers the landscape (including historic landscapes) of Blaenau Gwent. Policy SP10 Protection and Enhancement of the Natural Environment states that ...' designated landscapes will be protected and, where appropriate, enhanced'.

It is acknowledged that there was no specific reference to BBNP previously in the Deposit Plan but policy SP10 paragraph 6.66 has been amended (see below) to refer to BBNP in response to another representation (46D.44).

Designated landscapes include local designations such as Special Landscape Areas as well as national designations such as national parks. Relevant authorities have a legal duty under section 62(2) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated. Thus any development within Blaenau Gwent should not have an unacceptable impact on the setting of Brecon Beacons National Park which is in close proximity.

It should be noted that objective 12 has been amended (see below) in response to another CCW representation (10D.184) regarding a failure for the objectives failing to flow logically overall from the plan's Vision.

"The valuable landscape and natural heritage of Blaenau Gwent has been protected, enhanced and managed. Together they have helped foster sustainable tourism and promoted community pride."

Cross boundary issues have been addressed in the Plan. This is evident from the amendment made to SP10 paragraph 6.66 as explained above. The cross boundary issue regarding SLAs is recognised and is now explained (see below) in paragraph 8.73 of policy ENV2 Special Landscape Areas: *"Brecon Beacons National Park do not identify any Special Landscape Areas. Blaenau Gwent's SLA boundaries match Caerphilly's SLAs and VILLs but do not reflect those identified in Torfaen as they used a different approach by relying entirely on LANDMAP. Although Blaenau Gwent used LANDMAP it supplemented this with additional local criteria."*

- **Objects to lack of regard to home/work units (Mr I Roberts)**

Disagree. The promotion of home/work development is not considered a major issue worthy of inclusion in the LDP as Blaenau Gwent is not a rural area. The National Statistics Rural Urban Classification of Output Areas (July 2004) which determines whether settlements in Blaenau Gwent are urban or rural, identified that all wards are classified as urban with the exception of Cwm and Llanhilleth which are classified as Town and Fringe. The site in question is in an urban area.

Notwithstanding this, it is considered that criterion e of policy SP8 Sustainable Economic Growth will serve to support the promotion of rural enterprise which

includes such development as live/work units. This policy recognises the importance of increasing economic activity and diversifying the economy.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: SB1 Settlement Boundaries (Paragraphs 8.2 –8.4)

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.253	Countryside Council for Wales (CCW)	Sound (C2)	Supports policy SB1.
10D.254	Countryside Council for Wales (CCW)	Sound (C2)	Welcomes the clarification in paragraph 8.3 that planning applications for development in the countryside will be dealt with in accordance with national planning policy.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for policy SB1 (CCW)
- Welcomes the clarification of how development in the countryside will be dealt with (CCW)

COUNCIL RESPONSE

Council Analysis

- **Support for policy SB1 (CCW)**
Support welcomed.
- **Welcomes the clarification of how development in the countryside will be dealt with (CCW)**
Support welcomed.

Policy: MU1 Ebbw Vale Northern Corridor

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.255	Countryside Council for Wales (CCW)	Unsound CE1	Concerns regarding the potential impact from development on Rhyd-y-Blew and Bryn Serth SINC. No reference to any provision for open space or the retention of the SINC in Policy MU1.
10D.256	Countryside Council for Wales (CCW)	Unsound CE1	A significant area of Rhyd-y-Blew & Bryn Serth SINC will be lost to development. No details how the loss of the biodiversity interests is proposed to be compensated for, and how fragmentation of the retained SINC areas will be avoided or mitigated.
10D.257	Countryside Council for Wales (CCW)	Unsound CE1	Significant reduction in the area of green open space at N.W wedge of Ebbw Vale as a result of allocations MU1, EMP1.8 and T6.1 1 has the potential to impair ecological connectivity. Inconsistent with policies DM15 and DM16.
10D.258	Countryside Council for Wales (CCW)	Unsound CE1	Concerned about the potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC into countryside to the W & S of Ebbw Vale.
19D.95	DPP acting on behalf of Newbridge Construction Ltd (DPP)	Sound	Fully supports Ebbw Vale Northern Corridor as a "key area of change" and welcomes the allocation of the land for mixed use under Policy MU1. Considers the proposed mix of uses allowed is appropriate and particularly supports the

			inclusion of leisure.
19D.96	DPP acting on behalf of Newbridge Construction Ltd (DPP)	Sound	Welcomes the allocation of land at Waun-y-Pound Road for residential development and considers this site can make a significant contribution to the required housing provision of 700 dwellings. The site is fully serviced and has no constraints.
21D.85	GVA acting on behalf of Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Unsound	MU1 should provide sufficient flexibility to potentially enable the delivery of other complimentary land uses. This will enable the plan to offer a degree of flexibility to respond to market demands and changing economic and social trends.
21.D86	GVA acting on behalf of Lewis Civil Engineering Ltd/TATA Steel UK Ltd (GVA)	Sound	Fully support the allocation of the Ebbw Vale Northern Corridor under Policy MU1.
25D.38	Welsh Government Dept for Business, Enterprise, Technology and Science (WG - BETS)		Supports the identification of land at Rhyd y Blew as a strategic employment site under policy EMP1.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Concern regarding impact of development on SINC's (CCW)
- No detail of compensation for loss of SINC's (CCW)
- Concern regarding loss of green space at north west of site and the impact on ecological connectivity and foraging opportunities for Bats (CCW)
- Supports MU1 and inclusion of leisure at Bryn Serth (DPP)
- Support for allocation of land at Waun-y-Pond Road for residential development (DPP)
- MU1 is insufficiently flexible to respond to market demands (GVA)
- Support for the allocation of the Northern Corridor under MU1 (GVA)
- Support for the allocation of the Rhyd y Blew site (WG – BETS)

Desired Changes to LDP

- Reference to the protection of the SINC's and the provision of appropriate green space levels should be referred to in the policy itself (CCW)
- Clarification re compensation for loss of biodiversity and how fragmentation of the retained SINC areas will be avoided or mitigated is required in Policy MU1 or its justification to address the issues, and meet CE1 (CCW)
- Chapter 9 should highlight the potential for in-combination effect of these allocations on SAC features, and make provision to ensure that any development at these allocations should provide for appropriate bat movement/commuting routes (CCW)
- MU1 amended to include: other complimentary land uses (subject to compliance with other policies contained within the LDP) (GVA)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
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COUNCIL RESPONSE

Council Analysis

- **Concern regarding impact of development on SINC's (CCW)**
There are 2 SINC's which are impacted upon by this proposal. The first is Bryn Serth (ENV3.2), this site already has the benefit of planning permission and issues associated with the SINC have been addressed. A management plan has been agreed which will manage those areas not developed to enhance habitats and species. A S106 agreement has secured £25,000 as compensation for lapwing. The second site is Rhyd-y-Blew (ENV3.27), this site is a WG key strategic employment site and WG have already undertaken lapwing compensation at Parc Bryn Bach. However, they will also need to undertake further mitigation for development, based on the existing habitats and species. The indicative Concept Plan identifies a significant area of open space surrounding the developable area of this site. The Ebbw Vale Sustainable Regeneration Framework, which is SPG produced to support this allocation, identifies the importance of creating a network of green links to allow the effective integration of the SINC's and other key habitat areas. It is suggested that inclusion of a reference to this in the policy and reasoned justification will address the concerns raised.

Agree to amend Policy MU1 as follows:

In accordance with Policy SP1 land is allocated north of Ebbw Vale Town Centre for the construction of approximately 700 dwellings, a commercial leisure hub, road side services, employment, ~~and~~ a strategic mixed-use employment site *and a network of green links*.

Development of the site will be guided by the Ebbw Vale Sustainable Development Framework Supplementary Planning Guidance document.

Agree to amend paragraph 8.9 by the addition of the following bullet point:

- *A network of green links – to allow the effective integration of the SINCs and other key habitat areas.*

- **No detail of compensation for loss of SINCs (CCW)**

Disagree. In the interests of preparing a succinct Plan this level of information has not been included within the Plan. However, in order to show the Inspector that this issue has been addressed the following is a description of the compensation and mitigation agreed to date Bryn Serth (ENV3.2) already has the benefit of planning permission and issues associated with the SINC have been addressed. A management plan has been agreed which will manage those areas not developed to enhance habitats and species. A S106 agreement has secured £25,000 as compensation for lapwing. The second site is Rhyd-y-Blew (ENV3.27), this site is a WG key strategic employment site and WG have already undertaken lapwing compensation at Parc Bryn Bach. However, they will also need to undertake further mitigation for development, based on the existing habitats and species. The indicative Concept Plan identifies a significant area of open space surrounding the developable area of this site which will be used to improve the ecological credentials of the site.

- **Concern regarding loss of green space at north west of site and the impact on ecological connectivity and foraging opportunities for Bats (CCW)**

Following a meeting with CCW it has been agreed that the green wedge will be widened in this area. It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, EMP1.8, EMP1.5 and T6.1. These changes together with the wording changes being suggested to MU1 addresses the concerns raised by CCW.

Agree to amend boundary of MU1 as identified on map 1 attached in Appendix 3.

- **Supports MU1 and inclusion of leisure at Bryn Serth (DPP)**

Support welcomed.

- **Support for allocation of land at Waun-y-Pond Road for residential development (DPP)**

Support welcomed.

- **MU1 is insufficiently flexible to respond to market demands (GVA)**
Disagree. The development of the site is to be guided by the Ebbw Vale Sustainable Regeneration Framework, this enables the Council to change the document relatively quickly. The description in Policy MU1 is deliberately kept broad to enable flexibility.
- **Support for the allocation of the Northern Corridor under MU1 (GVA)**
Support welcomed.
- **Support for the allocation of the Rhyd y Blew site (WG – BETS)**
Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the boundary of allocation MU1 be amended on the proposals map.

The amendments to the mixed use allocation is shown on Map 1 attached at Appendix 3.

That the Council recommend to the Planning Inspector that Policy MU1 be amended as follows:

In accordance with Policy SP1 land is allocated north of Ebbw Vale Town Centre for the construction of approximately 700 dwellings, a commercial leisure hub, road side services, employment, ~~and~~ a strategic mixed-use employment site **and a network of green links.**

Development of the site will be guided by the Ebbw Vale Sustainable Development Framework Supplementary Planning Guidance document.

That the Council recommend to the Planning Inspector that Paragraph 8.9 be amended as follows:

The Ebbw Vale Sustainable Development Framework has assessed the development potential of the area and has identified the following elements:

- **Strategic mixed-use employment site** – on land at Rhyd-y-Blew (13.2 ha);
- **Employment and road side services** - at Bryn Serth (10.5 ha);
- **Commercial leisure hub** – commercial leisure and associated A3 uses (4 ha); and
- **Residential** - 700 units including 10% affordable housing on three parcels of land (23 ha) (It should be noted that not all of the existing facilities are required to

relocate to enable the provision of 700 dwellings).

- ***A network of green links – to allow the effective integration of the SINC's and other key habitat areas.***

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: MU2 'The Works'

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.157	Welsh Government (WG)		The plan advises that the proposed Learning Zone at 'the Works', is subject to 'Ministerial Decision and Judicial Review' (paragraph 8.12). It is understood that the position has been resolved; the Minister gave approval.
25D.41	Welsh Government – Business, Enterprise, Technology and Science (WG-BETS)		Supports the identification of land at The Works as a Business Park under policy EMP1.
49D.329	Pontypool Park Estate (PPE)		The Plans for The Works seem unimaginative, threaten to replicate the former Garden Festival site, are of short term value and act in opposition to the established urban centres. The masterplan should be much closer integrated to the town centre.
82D.392	Six Bells Communities First (SBCF)		Links between The Works development and areas such as Six Bells and the unique opportunities it can provide should be explored.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Deletion of reference to 'Ministerial Decision and Judicial Review' (WG)
- Supports land identified for Business Park (WG - BETS)
- Concerns regarding land uses and integration with town centre (PPE)
- Link to Six Bells Colliery to be explored (SBCF)

Desired Changes to LDP

- Delete reference to 'Ministerial Decision and Judicial Review' (WG)
- Change not clearly stated (PPE)
- Change not clearly stated (SBCF)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Deletion of reference to 'Ministerial Decision and Judicial Review'** (WG)

Agree. Delete reference to Ministerial Decision and Judicial Review from paragraph 8.12.

- **Supports land identified for Business Park** (WG - BETS)

Support welcomed.

- **Concerns regarding land uses and integration with town centre** (PPE)

Disagree. The Works site is providing significant new public facilities for Ebbw Vale, including new Health, Education and Leisure facilities. It also includes opportunities for new business and residential areas. The topography of the Valleys is such that the site is at a lower level than the town centre. The master plan addresses this by specifically including provision for the creation of a new town link to dramatically improve pedestrian linkages with the existing town centre.

The Works will provide a positive lasting legacy out of this Brownfield site having created significant new green space, protected heritage by the restoration of a Grade 2* Listed Building and embracing exemplar standards in sustainability through delivering energy efficient dwellings, public buildings and a new district heating system. It seeks to complement the existing urban centre, and contribute to the wider regeneration of Ebbw Vale and the whole Borough.

- **Link to Six Bells Colliery to be explored** (SBCF)

Noted. The aim is to ensure that all areas are well connected with Ebbw Vale and 'The Works' to ensure that the regeneration benefits can be spread across the Borough. The Tourism Information Centre at the General Offices will be able to signpost people to the Guardian at Six Bells. Once the community cycle network is complete there will be a cycle link between the areas.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Paragraph 8.12 be amended as follows:

Learning Zone – The Learning Zone includes the provision of education and training for 14-19 year olds. The Works site will also include a 21st Century 3-16 School over two sites that will provide; primary education; an integrated children's centre, secondary education and the relocated Pen y Cwm Special School ~~(subject to ministerial decision and Judicial Review)~~

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

**Policy: MU3 NMC Factory and Bus Depot
Alternative Site Ref: AS (A) 10, AS (A) 11**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
15D.355	Mr N Morris		Questions whether the proposed residential development will help regenerate the town centre as the new residents will be more likely to use the existing retail units at Lakeside Retail Park rather than the town centre.
15D.356	Mr N Morris		Supports the creation of an active link at this site if extra investment in terms of leisure facilities and locally run retail outlets could be built along the route. But questions who would invest in new retail units so close to a retail park.
28D.283	Savills on behalf of George LB (Savills)		The representation seeks to amend the boundary of MU3 to include the former Kwik Save site. This would complete the link between the town centre and Lakeside Retail Park which is important to the success of such a large scale redevelopment proposal.

Representation – Alternative Sites AS (A) 10 – Amend boundary to include the former Kwik Save

No	Name	Support /Object	Comment
92AS.619	Gwent Wildlife Trust (GWT)		No objection to development of this site however the adjacent SINC should be protected within the development.

Representation – Alternative Sites AS (A) 11 – Delete residential use

No	Name	Support /Object	Comment
92AS.1036	Gwent Wildlife Trust (GWT)		No objection to the development of this site however the adjacent SINC should be protected within the

			development.
93AS.1018	Cllr J Hopkins		No objection to delete the residential use.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Requests the deletion of residential use on the grounds that it will not help regenerate the town centre (Mr N Morris)
- Supports the creation of an active link but questions who would invest in new retail units so close to a retail park (Mr N Morris)
- Amend the boundary of MU3 to include the former Kwik Save site (Savills)

Desired Changes to LDP

- Delete proposed residential use (Mr N Morris)
- Change not clearly stated (Mr N Morris)
- Amend the boundary of MU3 to include the former Kwik Save site (Savills)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA/SEA/HRA

Evidence was submitted for alternative site AS (A) 10.

Compliance with LDP Strategy

Evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- No objection to amendment AS (A) 10 however the adjacent SINC should be protected within the development (GWT)
- No objection to amendment AS (A) 11 however the adjacent SINC should be protected within the development (GWT)
- No objection to delete the residential use (Cllr J Hopkins)

Desired Changes to LDP

- Deletion of housing from the MU3 site (Cllr J Hopkins)

COUNCIL RESPONSE

Council Analysis

- **Requests the deletion of residential use on the grounds that it will not help regenerate the town centre** (Mr N Morris) (Cllr J Hopkins)

Disagree. The Brynmawr Town Centre Visioning Report for Link Sites (2008) prepared by Macgregor Smith and DTZ assessed the development potential of the site and identified that residential development is one of the key development elements. The residential element of this site will sustain and increase the residential population which in turn will help regenerate the town centre by increasing footfall. The other element is commercial / leisure/ community facility opportunity which would help to increase facilities for the community and attract more visitors to the town.

It is accepted that not all of the new residents will use the town centre, as this is a matter of a choice of which the Local Development Plan has no influence over. However, the Local Development Plan must ensure that the appropriate measures are taken to help increase the vitality and viability of the town centre. For Brynmawr town centre this can be achieved through the allocation of the NMC Factory and Bus Depot for a mixed use allocation.

- **Supports the creation of an active link but questions who would invest in new retail units so close to a retail park** (Mr N Morris)

The support is welcomed for the creation of an active link. Policy MU3 identifies that a commercial/ leisure/community facility opportunity exists to act as an active link between the Town Centre and Lakeside Retail Park and not specifically a retail use. It is recognised that the leisure offer of Brynmawr is currently considered to be limited and the potential exists for a commercial / leisure/ community facility which would help to increase facilities for the community and attract more visitors to the town centre.

- **Amend the boundary of MU3 to include the former Kwik Save site** (Savills)

Disagree. As set out in Policy SP3 and the mixed use allocation MU3, the purpose of the allocation at the NMC Factory and Bus Depot site is to ensure that Brynmawr town centre benefits from the presence of the Lakeside Retail Park development through creating a link site. To include the former Kwik Save store would not be in accordance with the purpose of this allocation.

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives and the LDP Preferred Strategy objectives. The Council has assessed the site (current boundary) as part of the candidate site assessment process and again to reflect the proposed boundary amendment. The Council's assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues in particular the loss of the former Kwik Save store as significant retail opportunity for Brynmawr town centre.

The proposed boundary amendment to the MU3 site performs less favourably when compared to the candidate site assessment result (current boundary).

The former Kwik Save store buildings are viewed as an important retail opportunity for Brynmawr town centre. In fact there is currently an investor interested in redeveloping the site for retail purposes. Therefore for the benefit of Brynmawr town centre, the allocation should not be amended to include these buildings.

In addition the site allocation boundaries have been drawn to follow logical and defensible boundaries. The proposed amendment would not follow a logical line.

- **No objection to AS (A) 10 and AS (A) 11 however the adjacent SINC should be protected within the development (GWT)**

Noted. Policies SP10 and DM15 provides a policy framework to ensure the protection of a SINC.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: H1.1 Willowtown School
Alternative Site Ref: AS (D) 01, AS (A) 01, AS (A) 02**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
32D.363	Miss P Jones		Supports the allocation for housing and would like to be kept informed of the detailed plans for the site. Consideration should be given to the one way system, access, car parking for current residents and the retention of the community building.
37D.282	Mrs & Mrs D James		Amend the boundary of the Willowtown School housing allocation to exclude the community building. The community building should be retained for the use of the boxing club and Blaenau Gwent Young Stars.
43D.281	Mr & Mrs G J Webb		Amend the boundary of the Willowtown School housing allocation to exclude the community building. The community building should be retained for the use of the boxing club and Blaenau Gwent Young Stars.
44D.72	Mrs L Roberts		Supports the identification of the former Willowtown school for housing though would prefer if it were identified for private housing rather than housing association.
51D.362	Mr P Chambers		No personal opposition to housing at this site although consideration should be given to providing car parking for the area and on site community building and 'safe routes to school'.
60D.217	Unite the Union		Objects to the allocation of Willowtown School for housing, on the grounds of traffic problems; lack of off road car

			parking and lack of parking for the community building on site; questions the need for more houses in the area.
60D.219	Unite the Union		The representation seeks for the site to be reallocated in the Plan as a much needed car park (instead of housing) which would alleviate a potentially very dangerous situation for both motorists and pedestrians.

Representation – Alternative Sites AS (D) 01, AS (A) 01, AS (A) 02

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Support for housing allocation H1.1 provided that consideration is given to
 - Highway considerations (Miss P Jones)
 - Car parking (Miss P Jones) (Mr P Chambers)
 - The retention of the community building (Miss P Jones)
 - 'Safe routes to school' (Mr P Chambers)
 - Private housing on site (Mrs L Roberts)
- Amend the boundary of the allocation to exclude the community building (Mrs & Mrs D James) (Mr & Mrs G J Webb)
- Reallocate site for a car park instead of housing (Unite the Union)
- The site should be deleted from the Plan for the following reasons (Unite the Union):
 - Traffic problems
 - Lack of off road car parking
 - Lack of parking for the community building on site
 - Questions the need for more houses

Desired Changes to LDP

- Amend the boundary of the allocation to exclude the community building (Mrs & Mrs D James) (Mr & Mrs GJ Webb)
- Delete proposed residential use and allocate for a car park use (Unite the Union)
- Delete the site for housing from the Plan (Unite the Union)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

There are a number of issues relating to the site these are dealt with under the following headings:

- **Support for housing allocation H1.1 provided that consideration is given to:**

- **Highway Considerations** (Miss P Jones)

This site was previously assessed and approved under the Candidate Site Assessment Process for residential development (Candidate Site B44). Highway considerations were a key consideration in this process. The Highway Authority has completed both a site inspection and a Highway Assessment Proforma for this LDP allocation. It is the opinion of the Highway Authority that the local highway network is capable of serving the site subject to localised highway improvements. In addition a Traffic Impact Assessment, which would need to be submitted with any planning application, should identify any further highway improvements. These improvements would need to be addressed to the satisfaction of the highway authority for any formal planning application to be recommended for planning approval.

- **Car parking** (Miss P Jones) (Mr P Chambers)

The proposal to provide car parking on part of the site will be considered during the preparation of the detailed plans for the site.

- **The retention of the community building** (Miss P Jones)

The retention of the community building is dealt with under the issue below.

- **'Safe routes to school'** (Mr P Chambers)

This issue will be dealt with at the planning application stage.

- **Private housing on site** (Mrs L Roberts)

Local planning authorities are required by national guidance to make appropriate provision for affordable housing (PPW Edition 4: para. 9.1.2). It is desirable in planning terms that new housing development incorporates a reasonable mix and balance of house types and sizes so as to cater for a range of housing needs and contribute to the development of sustainable communities.

- **Amend the boundary of the allocation to exclude the community building** (Mrs & Mrs D James) (Mr & Mrs GJ Webb)

Disagree. The loss of the community building is covered by policy DM12 which seeks to protect community and leisure facilities. Policy DM12 recognises the importance of leisure and community facilities to the health, social and economic well being of the settlements within the County Borough.

Planning applications for the development of this site will need to be supported by appropriate evidence in order to demonstrate that the community facility is surplus to requirements.

It is agreed however to update the site descriptions document to read:

The *community building*, surrounding wall and railings should be retained where possible.

• **Reallocate site for a car park instead of housing** (Unite the Union)

Disagree. The housing allocation is considered developable, sustainable and compatible with the LDP strategy as identified in the candidate site assessment process. It would be unfeasible to provide car parking on the whole of the site, however part of the site could be used for car parking. This will be considered during the preparation of the detailed plans for the site.

• **Delete the site from the Plan** (Unite the Union)

This site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site B44).

The representor objected to the site for the following reasons:

▪ **Traffic problems and Lack of off road car parking**

The highway assessment undertaken as part of this process recognises that the local highway network experiences extensive on-street parking levels and that the existing highway junction configurations onto Garfield Terrace via Hughes Avenue and Brynheulog Street are substandard. However, the assessment recognises the need for upgrading the highway through widening footways, road and junction improvements.

▪ **Lack of parking for the community building on site**

The proposal to provide parking on part of the site for the community building can be considered during the preparation of the detailed plans for the site.

▪ **Questions the need for more houses**

The Housing need to be met by the Plan is based on Assembly Government Household Projections for Blaenau Gwent which identify the need for 3,932 dwellings between 2006-2021. A reduced figure of 3,500 is identified in the Plan to reflect the Council's plans to reduce the number of vacant properties in the area.

The figure is based on a population increase of 2,135 but only a quarter of this is as a result of migration to the area, the rest is from natural changes, that is more births than deaths. The reason a greater number of houses are needed is due to the reduction in the number of people living in each house. This reflects societal changes such as an aging population and more people choosing to live alone or in smaller households.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of

soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: H1.2 Cartref Aneurin Bevan
Alternative Site Ref: AS (A) 06**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
36D.119	Mr I Powell	Unsound (CE2)	Objects to any form of Housing Association being built at this site. Housing Association homes would be a disadvantage to the area de-valuing property and causing upset in the area. It should stay as an area for local pensioners.
38D.120	Mrs C Jeffries		The site should be developed for housing for the elderly not used for Housing Association.
39D.121	Mrs D Powell	Unsound (CE2)	Objects to housing association on the site but suggests the site could be used for retirement bungalows.
57D.122	Mr P Callaghan	Unsound (C4)	Urgent need to provide homes for the elderly in the area. Against housing other than for the elderly.
58D.123	Mrs M Callaghan		The site should be used for homes for the elderly as there is a need for this in the area and this site would be ideal.
61D.5	Nantybawch Senior Citizens Association (NSCA)		Object to housing allocation. The site should be retained for the elderly and Cartref Aneurin Bevan reopened.
61D.4	Nantybawch Senior Citizens Association (NCSA)		Housing allocation (H1.2) should be removed and a community facility should be provided at this site.
67D.124	Mr C Goodman		Objects to housing on grounds of increase of housing will lead to an increase in number of children, this area already suffers from anti social behaviour and vandalism; the site should be used for supported living provision.
68D.125	Mrs B James		Provision has not been made for older people in this area and this

			site would be ideal for an OAP complex. Anti social behaviour is a problem in this area.
77D.126	Mr W Jones		No objection to housing but want it to be allocated for OAP bungalows or Sheltered accommodation. The site should not be developed for Social Houses due to the social troubles such a site would bring.

Representation – Alternative Site AS (A) 06 – Delete proposed residential use and allocate as a community facility

No	Name	Support /Object	Comment
34AS.985	Mrs P Davies	Support	Support deletion of this site and its allocation for Community use.
68AS.908	Mrs B James	Object	Requested use for this site was to accommodate senior citizen housing not a community facility for all to use, please consider senior citizens when you decide the allocation of this site.
77AS.990	Mr W Jones	Object	Many of my neighbours agree that this site should be demolished and used for residential use for the elderly. It is large enough to accommodate an elderly sheltered warden controlled type home or bungalows suitable for old people.
213AS.988	Mr H Westacott	Object	An overwhelming number of residents in the area believe the site should be retained for the care of the elderly. Public consultation seems irrelevant given the dogmatic action already taken in closure and notices of its demolition.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- **Object to housing for the following reasons:**
 - Do not want Housing association development (Mr I Powell) (Mrs C Jeffries) (Mrs D Powell)
 - Retain site for the elderly (Mrs C Jeffries) (Mrs D Powell) (Mr P

- Callaghan) (Mrs M Callaghan) (NSCA) (Mr C Goodman) (Mrs B James) (Mr W Jones)
 - Increase in Crime (Mr C Goodman) (Mrs B James) (Mr W Jones)
- Delete housing and allocate for community use (NSCA)

Desired Changes to LDP

- Site to be used for housing for the elderly (Mr I Powell) (Mrs C Jeffries) (Mrs D Powell) (Mr P Callaghan) (Mrs M Callaghan) (NSCA) (Mr C Goodman) (Mrs B James) (Mr W Jones)
- Delete residential use and allocate the site as a community facility (NSCA)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues at Alternative Site Stage

- The key issues identified in the representation(s) are as follows:
- Support allocation for Community use (Mrs P Davies)
 - Object to allocation for Community use as it should be for the elderly (Mrs B James) (Mr W Jones) (Mr H Westacott)

Desired Changes to LDP

- Allocate site for community use (Mrs P Davies)
- Identify the site as housing for the elderly (B James) (Mr W Jones) (Mr H Westacott)

COUNCIL RESPONSE

Council Analysis

- There are a number of issues relating to the site these are dealt with under the following headings:
- **Delete the site from the Plan** (Mr I Powell) (Mrs C Jeffries) (Mrs D Powell) (Mr P Callaghan) (Mrs M Callaghan) (NSCA) (Mr C Goodman) (Mrs B James) (Mr W Jones)

This site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site A25).

The representors objected to the site for the following reasons:

- **Retain Housing for the elderly** (Mrs C Jeffries) (Mrs D Powell) (Mr P Callaghan) (Mrs M Callaghan) (NSCA) (Mr C Goodman) (Mrs B James) (Mr W Jones) (Mr H Westacott)

Disagree. Blaenau Gwent has developed a 'Living Independently in the 21st Century' Blaenau Gwent Older Peoples Strategy, to ensure a more co-ordinated and responsive approach to service provision for older people in the 21st century. The strategy is proposing a move away from standard residential care and proposes the closure of 4 of the 5 local authority homes, with the re-investment in specialist long-term residential provision. Further information is available in the Community Facilities Background Paper. In light of this strategy the Social Services Department decided that Cartref Aneurin Bevan was no longer required. The site was proposed for residential use and approved under the candidate assessment as stated above. It should be noted that a facility for older people is proposed at the former Greenacres site, which is in close proximity to Cartref Aneurin Bevan.

- **Do not want housing association** (Mr I Powell) (Mrs C Jeffries) (Mrs D Powell)

Disagree. It is not known who will develop the site but 10% affordable housing provision would be required as part of residential development at this site. In delivering housing the Council is required to met all housing requirements

- **Increase in crime** (Mr C Goodman) (Mrs B James) (Mr W Jones)

Disagree. Policy DM2 'Design and Placemaking' of the LDP will ensure that any development has regard to Secured by Design' principles in an effort to reduce opportunities for crime through management, design or changes to the environment. Developers are encouraged to take account of these principles.

- **Delete housing and allocate for community use** (NCSA) (Mrs P Davies)

Disagree. In 2007, as part of the candidate site process anyone with an interest in land was invited to submit sites for potential inclusion in the emerging LDP. The Council, as landowner, decided housing would be the preferred use for the site (as opposed to community use), which was submitted and approved as a candidate site. Details of current and future provision of community facilities are contained in the Community Facilities Background Paper.

Conclusion

The Council considers that the site is appropriate for allocation for residential development.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: H1.4 Jesmondene Stadium
Alternative Site Ref: AS (D) 02, AS (A) 07

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
16D.9	Councillor John Morgan on behalf of Tredegar Town Council (Cllr J Morgan)	Unsound	Housing allocation H1.4 should be removed from the Plan on the grounds of land instability, inadequate access and historical landscapes.
16D.10	Councillor John Morgan on behalf of Tredegar Town Council (Cllr J Morgan)	Unsound	Only the land occupied by the stadium should be developed with a maximum of 40 houses.
27D.7	G Williams (+19 signed petition)	Unsound (P1, P2, C1, C2, C3, C4, CE1, CE2, CE3, CE4)	Housing allocation H1.4 should be removed from the Plan on the grounds of land instability; school at full capacity; high volume of traffic; highway safety; pressure on emergency services and local amenities; wildlife; land contamination; Japanese knotweed; historical artefacts; public sewerage suffers from hydraulic overloading; and questions the need for further housing.
70D.13	E Griffiths (+3 signed petition)		Housing allocation H1.4 should be removed from the Plan due to experiencing considerable problems with water coming from the mountain behind houses in Oliver Jones Crescent.
72D.30	Mr B Brooks	Sound	Support for allocation H1.4.

Representation – Alternative Site AS (A) 07 –Amend boundary to exclude area outside of stadium

No	Name	Support /Object	Comment
72AS.691	Mr B Brooks	Object	Objects to the proposed amendment to exclude the area outside of the stadium as access would be difficult to achieve. Access could only be

			achieved via a nasty, uphill bend.
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Representation – Alternative Site AS (D) 02 – Delete allocation

No	Name	Support /Object	Comment
72AS.692	Mr B Brooks	Object	Objects to the deletion of this site and clarifies the following issues raised at the deposit plan stage: the steps on the shale mountain are created by animals; there were no sandbags, the Council created a gully out of concrete; and the mountain never came down.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be deleted from the Plan for the following reasons:
 - Land instability (Cllr J Morgan)
 - Inadequate access (Cllr J Morgan)
 - Historical landscapes (Cllr J Morgan)
 - School at full capacity (G Williams + petition)
 - High volume of traffic (G Williams + petition)
 - Highway safety (G Williams + petition)
 - Pressure on emergency services and local amenities (G Williams + petition)
 - Wildlife (G Williams + petition)
 - Land contamination (G Williams + petition)
 - Japanese knotweed (G Williams + petition)
 - Historical artefacts (G Williams + petition)
 - Public sewerage suffers from hydraulic overloading (G Williams + petition)
 - Questions the need for further housing (G Williams + petition)
 - Problems with water coming from the mountain (E Griffiths + petition)
- Amend the boundary to exclude the area outside the stadium (Cllr J Morgan)
- Support for allocation H1.4 (Mr B Brooks)

Desired Changes to LDP

- Delete the site for housing from the Plan (Cllr J Morgan) (Mr G Williams + petition) (E Griffiths + petition)
- Amend the boundary to exclude the area outside the stadium (Cllr J Morgan)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
P2	The plan and its policies have been subjected to Sustainability Appraisal including Strategic Environmental Assessment.
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
C3	It has regard to the Wales Spatial Plan.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Object to the amendment to exclude the area outside of the stadium as access would be difficult to achieve (Mr B Brooks)
- Object to the deletion of the site from the Plan for the following reasons (Mr B Brooks):
 - The steps on the shale mountain are created by animals
 - There were no sandbags
 - The Council created a gully out of concrete; and the mountain never came down

Desired Changes to LDP

- No change to the Plan (Mr B Brooks)

COUNCIL RESPONSE

Council Analysis

There are a number of issues relating to this site these are dealt with under the following headings:

- **Delete the site from the Plan** (Cllr J Morgan) (Mr G Williams + petition) (E Griffiths + petition)

This site was previously assessed and approved under the Candidate Site Assessment Process for residential development (Candidate Site A45).

The representors objected to the site for the following reasons:

- **Land instability** (Cllr J Morgan) (Mr B Brooks)

The Local Authority is currently investigating any potential slope stability issues between Marion Close and the stadium (within the site boundary) following modification works to the tip without any planning consent. Once the investigation is concluded the Authority will issue a statement on slope stability dependent upon the findings of the investigation.

- **Inadequate access** (Cllr J Morgan) (Mr B Brooks)

The highway assessment undertaken as part of the candidate site assessment process identifies that the development can be accessed by a single access point at Queen Victoria Street although the access point would need to be upgraded to serve the development. Given the close proximity of the existing junctions of Gainsborough Road/Attlee Road an additional access point to serve the proposed development would need to be closely investigated, for example it may require the construction of a mini-roundabout to serve the development and incorporate the existing junction configuration.

The Highway Authority also confirm that there are no highway objections to the proposed boundary amendment made by Cllr J Morgan and the above highway improvements would still apply.

- **Historical landscapes** (Cllr J Morgan)

The Countryside and Landscape Assessment undertaken as part of the candidate site assessment process identified the evaluation grade that the site has been designated in landscape value on Land Map. With regard to history and archaeology, the landscape value has been scored as low.

- **School at full capacity** (G Williams + petition)

As part of the candidate site process, the Education department were consulted to identify contribution requirements for future housing developments. For this site it is considered that a primary contribution would be required (May 2010).

- **High volume of traffic** (G Williams + petition)

The Highway Authority has completed both a site inspection and a Highway Assessment Proforma for this LDP allocation. It is the opinion of the Highway Authority that the local highway network is more than capable of serving as access to the site, subject to localised highway improvements and any recommendations of a Traffic Impact Assessment (T.I.A), which would need to be submitted with any Planning Application.

- **Highway safety** (G Williams + petition)

The Traffic Impact Assessment should identify any existing or potential highway safety concerns, these would need to be addressed to the satisfaction of the Highway Authority, for any formal Planning Application to be recommended for approval.

- **Pressure on emergency services and local amenities** (G Williams + petition)

The Council acknowledges the importance of ensuring that the provision of emergency services has been taken into account. In recognition of this the Council has worked with the Welsh Ambulance Service NHS Trust (WAST), South Wales Fire Service and Gwent Police Force in identifying sites for future provision. The Community Facilities Background Paper provides information on the latest position on this.

The Council also recognise the importance of ensuring that appropriate healthcare facilities are provided throughout Blaenau Gwent. In recognition of this need the Council has been working with the Health Authority in identifying sites for Primary Care Resource Centres. The Community Facilities Background Paper provides information on the latest position on this. The Aneurin Bevan Local Health Board has played an active part in preparing the Plan through participation at workshops, commenting on the Plan and undertaking a Health Impact Assessment.

- **Impact on Wildlife** (G Williams + petition)

The majority of the area within the stadium has been disturbed which has therefore reduced its value for biodiversity. However, there are areas likely to have a great value of biodiversity on the peripheral edges of the stadium and on the lower plateau to the east – this includes semi improved grassland and scrub, which are likely to support reptiles and breeding birds and possibly foraging bats. Chapter 9 of the Delivery and Implementation Chapter identifies that a full ecological survey including trees, vegetation, breeding bird and reptile surveys and a biodiversity constraints and enhancement plan is required at the full planning application stage.

- **Land contamination** (G Williams + petition)

Environmental Health at stage 2 of the candidate site assessment process identified that there is potential for contaminated land given the site's current operational use as a scrap yard.

The Coal Authority confirms that there is a record of possible/known shallow mine workings, underground working and mine entries on the site.

- **Japanese knotweed** (G Williams+ petition)

It is acknowledged that the stream line along the southern boundary is

infested with Japanese Knotweed. This knotweed would require the appropriate treatment for its removal.

▪ **Historical artefacts** (G Williams + petition)

Glamorgan Gwent Archaeological Trust identify that the site is adjacent to the site of a Mountain Pit and associated features such as tramways and leats may be located in area. The Trust confirms that the archaeological restraints do not prevent allocation of land in the LDP: However, conditions may be attached to any planning consent that is granted. The Heritage Officer confirms that the site is a former dog racing stadium, there are no buildings or structures left on site of any architectural or heritage merit.

▪ **Public sewerage suffers from hydraulic overloading** (G Williams + petition)

Stage 3 of the candidate site assessment process sought the views of external consultation bodies. Dwr Cymru Welsh Water confirm that parts of the public sewerage network suffer from hydraulic overloading. No regulatory improvements are planned under Dwr Cymru Welsh Water's current 5 year Capital Investment Programme. Should this be developed in advance of any Regulatory Improvements, developers may be required to fund the essential improvements.

▪ **Questions the need for further housing** (G Williams+ petition)

The Housing need to be met by the Plan is based on Assembly Government Household Projections for Blaenau Gwent which identify the need for 3,932 dwellings between 2006-2021. A reduced figure of 3,500 is identified in the Plan to reflect the Council's plans to reduce the number of vacant properties in the area.

The figure is based on a population increase of 2,135 but only a quarter of this is as a result of migration to the area, the rest is from natural changes, that is more births than deaths. The reason a greater number of houses are needed is due to the reduction in the number of people living in each house. This reflects societal changes such as an aging population and more people choosing to live alone or in smaller households.

To help deliver sustainable communities the planning system is required to ensure that all local communities have sufficient good quality housing for their needs, including affordable housing for local needs and for special needs where appropriate.

Local planning authorities are required by national guidance to make appropriate provision for affordable housing (PPW Edition 4: para. 9.1.2). It is desirable in planning terms that new housing development incorporates a reasonable mix and balance of house types and sizes so as to cater for a range of housing needs and contribute to the development of sustainable communities.

It is accepted that there are a number of planning permissions in the area for residential development. These have been taken into account when allocating the share of growth to the Tredegar area. It is accepted that the Tredegar area has a slightly higher share of housing than the Upper and Lower Ebbw Fach

areas, although this is due to the lack of sites available for development in the south of the Borough.

- **Problems with water coming from the mountain** (E Griffiths+petition) (Mr B Brooks)

Stage 3 of the candidate site assessment process sought the views of external consultation bodies. The Environment Agency commented that a large amount of surface water would be displaced. It is recommended to overcome this a Sustainable Urban Drainage System would need to be introduced for the site for the development of housing

- **Amend the boundary to exclude the area outside the stadium** (Cllr J Morgan)

Disagree. The LDP allocation is a previously developed site and follows a logical site boundary. To only allocate the former dog racing stadium would not follow a defensible line which is contrary to the approach taken with all LDP allocations and the settlement boundary.

- **Support for allocation H1.4** (Mr B Brooks)
Support welcomed.

Conclusion

Given the unresolved land stability issue and concern regarding land contamination which raises questions of the site's viability and deliverability it is proposed to delete the site from the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Written Statement and Proposals Map be amended to delete H1.4 Jesmondene Stadium as a housing site within the Tredegar area.

Policy Number	Site Name	Area (Ha)	Units
Tredegar Area			
<i>H1.4</i>	<i>Jesmondene Stadium</i>	<i>5.26</i>	<i>184</i>

The deletion of the housing allocation is shown on Map 2 attached at Appendix 3.

This change results in consequential amendments to:
The figures in the H1 Policy Table.
Paragraphs 5.5 and 5.13 in Chapter 5.0 – Spatial Strategy
Policy SP4 criteria a and c and paragraphs 6.30, 6.32 and 6.33 in Chapter
6.0 – Strategic Polices
Policy SP5 and paragraphs 6.36 and 8.28 in Chapter 6.0 – Strategic Polices

Reason for Recommendation

The proposed change is not substantive but would remove an allocation from the LDP that may prove difficult to realise due to land instability and contamination. Importantly the change would not affect the soundness of the plan.

**Policy H1.5 Business Resource Centre
Alternative Site Ref: AS (D) 03**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound , Unsound	Comment
84D.14	Mr S East		Housing allocation H1.5 should be removed from the Plan because of traffic concerns, it would destroy the character of the area and result in a loss of employment land.

Representation – Alternative Site AS (D) 03 – Delete Allocation

No	Name	Support Object	Comment
34AS.983	Mrs P Davies	Support	Strongly support deletion. The Business Resource Centre is the only Borough Council presence in Tredegar and should be retained.
113AS.945	Mr T P Griffiths	Support	Development would destroy the nature of the village. Land forms part of an industrial estate exclusively for that purpose. It seems there is one rule for residents and one for the Council who can change what they want when they want to suit their own needs.
114AS.942	Mr P W Pearson	Support	The Council shouldn't be building homes in the middle of an industrial estate. We need to attract more business to this area which in turn will require training facilities.
122AS.940	Mr & Mrs T Gregory	Support	This development would result in a further 360-400 residents. 100-200 extra cars so traffic concerns. Entrance to site opens onto the carriageway. If Training Centre was privately owned planning permission for change of use wouldn't be given. Council should utilise site at old NCB works.
127AS.939	Mr W Ingles	Support	What is the point of disposing of

			the Training Centre in this current economic climate. Not only would noise and fumes be a problem for this development but massive lorries run past this site every day. The level of traffic is already bad.
137AS.949	Mr L Hudson	Support	Housing shouldn't be granted on an industrial estate, other applications have been turned down before. How would local schools cope with influx in students? Crime and disorder will increase including at Bryn Bach Park.
138AS.932	Mr M Burns	Support	Housing Association would de-value our properties. It is well known that associations are not particular who they rent to as long as it fetches income and one bad apple quickly spreads. When economy picks up the Training Centre will be needed.
140AS.930	Mr T Watkins	Support	It is out of order to put housing on an industrial estate there is already too much traffic for a small village without the legal implications of change of use. Planning permission should not be granted for this reason.
142AS.964	Mr & Mrs D Jervis	Support	Development will cause an increase in dust traffic, light and pollution. Mass house building results in ghettos being created. The need to attract new industry is more relevant than ever.
163AS.929	Dr S Andrews	Support	Local Schools will be unable to cope with an influx of pupils. Transport links are substandard. Development would destroy the nature of the village. Noise crime and dust will increase. Land forms part of a long standing industrial estate.
169AS.928	Mr M Bevan	Support	Surely it calls for more effort to encourage industry to the area when it is at an all time low rather than being discouraged

			by housing. This must set a national precedence to consider a change of use from industrial to residential.
170AS.927	Mr P Ridings	Support	Housing is totally unsuitable for the area. Access roads wouldn't cope with an increase in traffic. More school places would be needed. The Council should give more thought in encouraging industry to this area.
171AS.926	Mrs C Joseph	Support	Development would; <ul style="list-style-type: none"> • destroy a well established friendly community • result in inadequate road links to support extra traffic The training centre was recently promoted as a flagship centre. In time the industrial estate could attract more business into the area.
183AS.925	Mrs J Britton	Support	Extra housing would; <ul style="list-style-type: none"> • cause an increase in traffic • change the status of the village • result in a town with no amenities • cause accidents with heavy traffic past a residential site • result in security issues
187AS.924	Mrs S Jones	Support	2 Housing Associations have already failed to complete leaving a mess in Tredegar. The site is already providing a necessary place of training for Tredegar people. Surely the Council must question themselves - Why?
190AS.923	Mr & Mrs W Mutton	Support	<ul style="list-style-type: none"> • It would destroy the nature of our village. • Increase Traffic. • Take away possible jobs. • Take away light from my property. • Possible Increase in crime. • Decrease the value of my property.
191AS.922	Mr R Price	Support	This site would destroy the

			nature of the village; there would be additional noise from increase in traffic and probable increase in crime.
192AS.921	Mrs T Price	Support	Housing Development would destroy the nature of the village which is small and well established. Could cause increase in crime. Training Centre is needed, training means jobs.
197AS.920	Mr P Williams	Support	It is a ludicrous suggestion for housing. Large lorries carrying steel past the site is a regular occurrence. Access via Bryn Bach School is inadequate. Lack of local amenities to cope with large population.
214AS.919	Mrs C Brown	Support	Proposal for housing would increase noise traffic and crime it would have a detrimental effect on Bryn Bach Park. Site is designated an industrial estate and should remain so. The policies in place would be somewhat confusing if one section was used for houses.
217AS.918	Mrs N Barry	Support	Princetown has a distinct village atmosphere which would be destroyed by a large number of houses. It would increase traffic congestion past an already congested school. Noise would increase and maybe crime due to the purpose of the housing.
222AS.917	Mr P Pearson	Support	Losing this facility at a time when training and retraining is vital for the economy is wrong. 120 homes in the middle of an industrial estate will bring problems such as security noise and traffic congestion especially at Bryn Bach School.
230AS.914	Miss D Biggs	Support	Site would overlook properties reducing light. It would destroy the nature of the village which is small well defined and established. Site is part of a long standing industrial estate, for anyone

			else planning permission would be refused for this very reason.
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Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- The site should be deleted from the Plan for the following reasons (Mr S East):
 - Traffic concerns
 - Loss of character of village
 - Loss of employment land

Desired Changes to LDP

- Delete the site for housing from the Plan (Mr S East)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA, SEA, HRA

No evidence was submitted

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the deletion of the site from the Plan for the following reasons:
 - Loss of employment land (Mr S East)
 - Only Borough Council presence in Tredegar (Mr S East) (Mrs P Davies)
 - Nature of the village (Mr T P Griffiths) (Dr S Andrews) (Mrs C Joseph) (Mr & Mrs W Mutton) (Mr R Price) (Mrs T Price) (Mrs N Barry) (Miss D Biggs)
 - Training centre needed (Mr P W Pearson) (Mr M Burns) (Mrs C Joseph) (Mrs S Jones) (Mrs T Price) (Mr P Pearson)
 - Noise, fumes, dust & pollution (Mr W Ingles) (Mr & Mrs D Jervis) (Dr S Andrews) (Mr R Price) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson)

- Traffic (Mr T Gregory) (Mr S East) (Mr W Ingles) (Mr T Watkins) (Mr & Mrs D Jervis) (Dr S Andrews) (Mr P Ridings) (Mrs C Joseph) (Mrs J Britton) (Mr & Mrs W Mutton) (Mr R Price) (Mr P Williams) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson)
- Schools unable to cope (Mr L Hudson) (Dr S Andrews) (Mr P Ridings)
- Crime and disorder (Mr L Hudson) (Dr S Andrews) (Mr & Mrs W Mutton) (Mr R Price) (Mrs T Price) (Mrs C Brown) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson)
- Devalue properties (Mr M Burns) (Mr & Mrs W Mutton)
- Loss of light (Mr & Mrs W Mutton) (Miss D Biggs)
- Lack of local amenities (Mr P Williams)
- Detrimental impact on Parc Bryn Bach (Mrs C Brown)

Desired Changes to LDP

- Delete the site from the Plan (Mr S East) (Mrs P Davies) (Mr T P Griffiths) (Mr P W Pearson) (Mr & Mrs T Gregory) (Mr W Ingles) (Mr L Hudson) (Mr M Burns) (Mr T Watkins) (Mr & Mrs D Jervis) (Dr S Andrews) (Mr M Bevan) (Mr P Ridings) (Mrs C Joseph) (Mrs J Britton) (Mrs S Jones) (Mr & Mrs W Mutton) (Mr R Price) (Mr P Williams) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson) (Miss D Biggs)

COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan** (Mr S East) (Mrs P Davies) (Mr T P Griffiths) (Mr P W Pearson) (Mr & Mrs T Gregory) (Mr W Ingles) (Mr L Hudson) (Mr M Burns) (Mr T Watkins) (Mr & Mrs D Jervis) (Dr S Andrews) (Mr M Bevan) (Mr P Ridings) (Mrs C Joseph) (Mrs J Britton) (Mrs S Jones) (Mr & Mrs W Mutton) (Mr R Price) (Mr P Williams) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson) (Miss D Biggs)

The site was previously assessed and approved under the Candidate Site Assessment Process (candidate site A43).

The following issues were raised:

- **Loss of employment land** (Mr S East)

It is agreed that the allocation of the site for housing would result in the loss of employment land. The site is currently occupied by a training centre and offices for the Council's regeneration division and is located on a primary industrial estate - Tafarnaubach Industrial Estate. There are long term plans to relocate the training centre hence the consideration of the site for housing development. At present no formal decision has been taken in terms of the relocation of the training facility. As the training facility forms an important aspect of the employment strategy for Blaenau Gwent it is considered that the site should be retained for this use.

In addition to this, the recently announced Enterprise Zone should provide

employment opportunities and boost the local economy. Therefore, in the event that the training facility is relocated from this site then the land would still be required for employment use. Therefore the site should be retained for employment use.

- **Only Borough Council presence in Tredegar** (Mrs P Davies)

This is not strictly true as, for example, Bedwellty House, and Parc Bryn Bach are major tourist attractions and represent a considerable presence in Tredegar.

- **Nature of the village** (Mr T P Griffiths) (Dr S Andrews) (Mrs C Joseph) (Mr & Mrs W Mutton) (Mr R Price) (Mrs T Price) (Mrs N Barry) (Miss D Biggs)

The site is currently located on an established industrial estate – Tafarnaubach Industrial Estate and is currently occupied by a training centre and council offices. The site is bordered to the north and east by the main access road into the industrial estate and to the south by new residential properties. The integration of housing and industry could lead to more sustainable lifestyles but design and location are important issues. There is a danger that the exponential growth of Tafarnaubach and Princetown villages could destroy any sense of community and result in a loss of character.

- **Training centre needed** (Mr P W Pearson) (Mr M Burns) (Mrs C Joseph) (Mrs S Jones) (Mrs T Price) (Mr P Pearson)

It is recognised that the training centre is a valuable asset and is committed to delivering services that concentrate on the upskilling of the local community. Admittedly, there are long term plans to relocate the training centre however the provision will be made from another site rather than losing the service provision. The location of the new site is yet to be determined.

- **Noise, fumes, dust & pollution** (Mr W Ingles) (Mr & Mrs D Jervis) (Dr S Andrews) (Mr R Price) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson)

With regard to the issues raised above, this would be dealt with at the planning application stage. Any development would need to be in accordance with policy DM1 which seeks to control the potential adverse impacts which could arise from the development. The unacceptable risk of harm to health and, or local amenity from unacceptably high levels of noise, vibration, odour or light pollution is a key consideration of this policy.

- **Traffic** (Mr T Gregory) (Mr W Ingles) (Mr T Watkins) (Mr & Mrs D Jervis) (Dr S Andrews) (Mr P Ridings) (Mrs C Joseph) (Mrs J Britton) (Mr & Mrs W Mutton) (Mr R Price) (Mr P Williams) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson)

Stage 2 of the candidate site assessment process included expert assessments from a range of specialists The Highways assessment undertaken for the candidate site assessment process considers that the site is suitable for residential development.

- **Schools unable to cope** (Mr L Hudson) (Dr S Andrews) (Mr P Ridings)

The Education Department were consulted and have identified that local

schools can absorb this need.

- **Crime and disorder** (Mr L Hudson) (Dr S Andrews) (Mr & Mrs W Mutton) (Mr R Price) (Mrs T Price) (Mrs C Brown) (Mrs C Brown) (Mrs N Barry) (Mr P Pearson)

Policy DM2 'Design and Placemaking' of the LDP will ensure that any development has regard to Secured by Design' principles in an effort to reduce opportunities for crime through management, design or changes to the environment. Developers are encouraged to take account of these principles.

- **Devalue properties** (Mr M Burns) (Mr & Mrs W Mutton)

No scientific evidence has been submitted to substantiate this claim.

- **Loss of light** (Mr & Mrs W Mutton) (Miss D Biggs)

With regard to loss of light, this would be dealt with at the planning application stage. Any development would need to be in accordance with policy DM1 which seeks to control the potential adverse impacts which could arise from the development. The unacceptable risk of harm to health and/or local amenity from unacceptably high levels of noise, vibration, odour or light pollution is a key consideration of this policy.

- **Lack of local amenities** (Mr P Williams)

As part of the candidate site assessment it was determined that the site is well located in terms of community facilities, for example, Parc Bryn Bach is in close proximity as well as a local school, shopping facilities, public house and a railway station.

- **Detrimental impact on Parc Bryn Bach** (Mrs C Brown)

It is not considered that there would be a detrimental impact on Parc Bryn Bach due to a risk of more crime from this housing development.

Conclusion

The Council considers that the site is inappropriate for allocation for residential development as the land is now required for employment use and there is also concern with the loss of character of the village.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Written Statement and Proposals Map be amended to delete H1.5 Business

Resource Centre as a housing site within the Tredegar area and include the site within the Employment Protection Area (EMP2.5)

Policy Number	Site Name	Area (Ha)	Units
Tredegar Area			
<i>H1.5</i>	<i>Business Resource Centre, Tafarnaubach</i>	<i>1.2</i>	<i>42</i>

The deletion of the housing allocation is shown on the Map 3 attached at Appendix 3.

Map 4 at appendix 3 shows the inclusion of the site within the Employment Protection Area (EMP2.5)

This change results in consequential amendments to:

The figures in the H1 Policy Table.

Paragraphs 5.5 and 5.13 in Chapter 5.0 – Spatial Strategy

Policy SP4 criteria a and c and paragraphs 6.30, 6.32 and 6.33 in Chapter 6.0 – Strategic Policies

Policy SP5 and paragraphs 6.36 and 8.28 in Chapter 6.0 – Strategic Policies

Reason for Recommendation

The proposed change is not substantive but would remove an allocation from the LDP as the land is now required for employment and there are concerns over loss of character. Importantly the change would not affect the soundness of the plan.

Policy: H1.6 Land adjacent to Chartist Way
Alternative Site Ref: AS (D) 04

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.260	Countryside Council for Wales (CCW)	Unsound (CE1)	Concerns regarding the potential loss of this urban green space (H1.6) and the connectivity it provides within the area.
35D.6	Mr B Phipps	Unsound (CE2)	Housing allocation H1.6 should be removed from the LDP as the development would be unsafe, visually obtrusive and bring more children to the area.

Representation – Alternative Site AS (D) 04 – Delete the Allocation

No	Name	Support /Object	Comment
10AS.770	Countryside Council for Wales (CCW)	Support	Support proposed deletion due to potential loss of urban green space and the connectivity it provides.
92AS.624	Gwent Wildlife Trust (GWT)	Comment	Development should protect and enhance the woodland to the west of the site.
141AS.968	Mr A Clemo	Support	Site could be unsuitable due to past mining activities. Would be advisable to question the demand for additional housing. Community identities could be jeopardised. Will increase anti social behaviour.
225AS.916	Mr & Mrs Davies	Support	Ystrad Deri gets a lot of problems with youths from the estate throwing objects at our homes. No objection to building bungalows for the elderly or disabled on the site but do object to houses.
254AS.904	Mr A Williams	Support	Local Paddocks for horses are in short supply in Tredegar. The road to the rear of the properties is used as a rat run which can only get worse with housing.
255AS.907	Mrs C Dovey	Support	Fully support application to

			delete H1.6 as an alternative plot for housing.
256AS.906	Miss R Williams	Support	Object to housing on the land by Chartist Way.
257AS.905	Miss C J Powell	Support	Support deletion of this site for housing.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- The site should be deleted from the Plan for the following reasons:
 - Loss of green space of recreational, amenity and biodiversity value (CCW)
 - Loss of connectivity (CCW)
 - Unsafe (Mr B Phipps)
 - Visually obtrusive (Mr B Phipps)
 - Bring more children to the area (Mr B Phipps)

Desired Changes to LDP

- Delete the site for housing from the Plan (CCW) (Mr B Phipps)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the deletion of the site from the Plan for the following reasons:
 - Traffic (Mr A Williams)
 - Woodland protection and enhancement (GWT)
 - Loss of green space and connectivity (CCW)
 - Unsuitable land (Mr A Clemo)
 - Need for additional housing (Mr A Clemo)
 - Community identities jeopardised (Mr A Clemo)
 - Anti-social behaviour (Mr A Clemo) (Mr & Mrs Davies)
 - Bungalows acceptable not houses (Mr & Mrs Davies)

- Need for Paddocks (Mr A Williams)

Desired Changes to LDP

- Delete the site from the Plan (Mr A Williams) (GWT) (CCW) (Mr A Clemo) (Mr & Mrs Davies) (Mrs C Dovey) (Miss C J Powell)

COUNCIL RESPONSE

Council Analysis

- **Delete the Site from the Plan** (CCW) (Mr B Phipps) (Mrs C Dovey) (Miss C J Powell)

The site was previously assessed and approved under the Candidate Site Assessment Process (candidate site A36). The site was considered to be suitable for residential development. No new evidence has been submitted since the Council's assessment of the site and the Council's previous findings therefore remain.

The following issues were raised:

- **Loss of green space and connectivity** (CCW)

The development land consists of natural green space and consequently some open space will be lost as a result of this development.

However, in accordance with Policy DM13 'Provision for Open Space, Recreation and Leisure Facilities' in developments of 10 or more units provision for open space, recreation and leisure facilities will be sought where there is a deficit in provision. As identified in Chapter 9.0 of the LDP 'Delivery and Implementation' provision of a MUGA and wheeled sports area will be sought in respect of infrastructure needs in terms of leisure provision.

In terms of leisure provision in the area it should be noted that a site (L1.1) has been allocated for formal leisure facilities (for outdoor recreational facilities) at Chartist Way on land immediately to the north of this allocated housing site.

Policy DM16 'Protection and Enhancement of the Green Infrastructure' will serve to protect and enhance the Green Infrastructure including connectivity between green spaces. The Green Infrastructure includes natural green spaces such as this development area. Whilst some open space will be undeniably lost in the event of this development the connectivity will remain because of the embankment, which acts as a green corridor. The Sites Description document explains that the broadleaved woodland to the west of the site needs to be protected and buffered as it provides an ecological corridor. Further information on the Green Infrastructure is available in the Environment background Paper.

- **Bring more children to the area** (Mr B Phipps)

Policy DM2 'Design and Placemaking' of the LDP will ensure that any development has regard to Secured by Design' principles in an effort to reduce opportunities for crime through management, design or changes to the environment. Developers are encouraged to take account of these principles.

- **Visually obtrusive** (Mr B Phipps)

The development should not be visually obtrusive as Policy DM2 (Criterion a) will ensure that they are appropriate to local context.

- **Woodland protection and enhancement** (GWT)

Policy DM17 'Trees, Woodlands and Hedgerow Protection' of the LDP will ensure that trees, woodlands and hedgerows are protected from unacceptable harm.

- **Unsafe/Unsuitable land** (Mr A Clemo) (Mr B Phipps)

It has been stated that the land is unsuitable because of previous mining activities.

As part of the candidate assessment process Environmental Health concluded that due to its former industrial use (former Sirhowy Ironworks and former brickworks site), there is potential for contamination and that a ground investigation and risk assessment is required. This will be carried out as part of the planning application process. It should also be noted that any development would be subject to a Site Investigation, which would identify any ground remediation necessary for the development including in relation to any issues with ground stability.

- **Demand for additional housing** (Mr A Clemo)

The Population and Housing Background Paper explains, in detail, the housing requirement for Blaenau Gwent, together with the proposed spatial distribution of housing sites, including the requirement for Tredegar.

- **Community identities jeopardised** (Mr A Clemo)

The representor has raised the issue that community identities will be jeopardised as a result of the development but has failed to justify this statement.

- **Anti-social Behaviour** (Mr A Clemo) (Mr & Mrs Davies)

Policy DM2 'Design and Placemaking' of the LDP will ensure that any development has regard to Secured by Design' principles in an effort to reduce opportunities for crime through management, design or changes to the environment. Developers are encouraged to take account of these principles

- **Bungalows acceptable not houses** (Mr & Mrs Davies)

Policy DM2 'Design and Placemaking' of the LDP will ensure that development proposals are appropriate to the local context in terms of type, form, scale, mix and density.

- **Need for Paddocks** (Mr A Williams)

No evidence has been submitted to support the claim that local paddocks for horses are in short supply in Tredegar.

- **Traffic** (Mr A Williams)

The sites allocated in the plan have been subject to a Highway assessment, which concluded that this site was acceptable. It recognised that although there is no existing access point serving the site, access to the site can be achieved from Chartist Way. Access and highways issues can be addressed through other policies in the plan and through the planning application process. However, this is not seen as insurmountable to development of the site.

Conclusion

The Council considers that the site is appropriate for allocation for residential development

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: H1.8 Crawshay House, Brynmawr
Alternative Site Ref: AS (A) 09

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
15D.353	Mr N Morris		Objects to the allocation of the site for residential use. The site would be better used for a hotel use to cater for the planned tourism as the site is close to the HOV road; 200m from a cycle route; and 5 minutes walk from the Brecon Beacons National Park.

Representation – Alternative Site AS (A) 09 – Delete proposed residential use and allocate for a hotel use

No	Name	Support /Object	Comment
92AS.618	Gwent Wildlife Trust (GWT)		No objections to the development of this site however any mature trees should be retained and protected within the development.

Summary of Key Issues at Deposit Stage

The key issue identified in the representation is as follows:

- Objects to proposed residential use at this site as the site would be better used for a hotel use (Mr N Morris)

Desired Changes to LDP

- Delete proposed residential use and allocate for a hotel use (Mr N Morris)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation are as follows:

- Mature trees should be retained and protected (GWT)

Desired Changes to LDP

- No change required (GWT)

COUNCIL RESPONSE

Council Analysis

- **Objects to proposed residential use at this site as the site would be better used for a hotel use** (Mr N Morris)

This site was previously assessed and approved under the Candidate Site Assessment Process for residential development (Candidate Site C23). The site is considered a developable, sustainable and viable residential allocation as demonstrated in the Findings of the Candidate Site Assessment Process Report: Upper Ebbw Fach Sites.

The Plan allocates land at Parc Bryn Bach for a hotel use. It is acknowledged that more hotel accommodation is needed to take full advantage of the potential for tourism development in this area. However conclusions from a market assessment prepared for the Parc Bryn Bach hotel allocation found that:

'The UK economic recovery remains relatively weak and the outlook uncertain. As a result active buyers still have a cautious approach to assessing hotel acquisition opportunities and new hotel development, particularly in provincial locations. Obtaining funding and the trading environment for provincial hotels development remain difficult. These factors have also suppressed demand for new, non primary hotel sites.

It should be noted that budget hotels on roadside locations are often developed in conjunction with a separate restaurant building. Typically, such restaurants will be in the fast food/ drive thru/ chain end of the market, e.g. McDonalds, Little Chef etc. In areas with a higher population density, budget hotels are often developed alongside a public house, e.g. Travelodge work closely with Marstons Pub Company and the Whitbread owned Premier Inn often utilise their own stable of pub/ restaurant brands including Beefeater and Brewers Fayre'.

In light of this and the fact that every allocation in the Plan has to be supported by a robust evidence base, demonstrate deliverability and viability, and that the Council's Estates department are not aware of any interest at the moment from hotel companies looking to develop in the Brynmawr area, it is recommended that no change is made to this allocation.

Tourism and leisure initiatives are encouraged and supported in policy SP8. This is a key sector which will help to help diversify and improve the economy.

- **Mature trees should be retained and protected** (GWT)

Agree. The site description for allocation H1.8 should be updated to reflect

that mature trees should be retained and protected.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: H1.9 Infants School and Old Griffin Yard
Alternative Site Ref: AS (D) 09**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
54D.179	Mrs M Stephens		Objects to the allocation of the site on the grounds of pedestrian safety; the highway infrastructure incapable of accommodating additional housing; and strained utility networks.

Representation – Alternative Site AS (D) 09 – Delete Allocation

No	Name	Support /Object	Comment
189AS.648	Mrs V Hiscox	Support	Support the decision to delete the site for housing on the grounds of increased traffic flow; inadequate road infrastructure; the privacy of existing properties bordering the area would be compromised; and the need for relaxation facilities.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The site should be deleted from the Plan for the following reasons (Mrs M Stephens):
 - Pedestrian Safety
 - Highway infrastructure inadequate
 - Strained utility networks

Desired Changes to LDP

- Delete the site for housing from the Plan (Mrs M Stephens)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the deletion of the site from the Plan for the following reasons (Mrs V Hiscox):
 - Increased traffic flow
 - Inadequate road infrastructure
 - Residential amenity
 - The need for relaxation facilities

Desired Changes to LDP

- Delete the site from the Plan (Mrs V Hiscox)

COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan** (Mrs M Stephens) (Mrs V Hiscox)

This site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site C25).

The following issues were raised:

- **Pedestrian Safety** (Mrs M Stephens)

This issue will be dealt with at the planning application stage. Any development would need to be in accordance with policy DM1 which seeks to ensure that the development does not adversely affect the safe and efficient operation and use of the transport network and services.

- **Highway infrastructure inadequate** (Mrs M Stephens)

Stage 2 of the candidate site assessment process included expert assessments from a range of specialists. The highways assessment identifies that the existing vehicular access onto King Street, serving the school is substandard and cannot facilitate two way traffic flow as it stands. However, access can be achieved onto King Street given careful design consideration to design and access arrangements. Whilst vehicular access could potentially be achieved via Clydach Street this would not be acceptable to the Highways Authority. Clydach Street is substandard in design and construction and is recognised as being at capacity in terms of serving any future development. The Highway Authority would require any development proposal for this site to include a highway improvement scheme along Clydach Street.

- **Strained utility networks** (Mrs M Stephens)

Stage 3 of the candidate site assessment process sought the views of external consultation bodies. The views of Dwr Cymru Welsh Water and Western Power Distribution have been provided and there are no objections to the proposed residential development at this site. Dwr Cymru Welsh Water made the following observations:

Sewerage: No problems are envisaged with the public sewerage system for domestic foul discharge from this development. The site is crossed by public sewer(s) which may restrict the density of development. Protective measures or a diversion of these assets may be required prior to the development proceeding.

Sewerage Treatment: No problems are envisaged at the receiving WWTW to accommodate the domestic foul flows from this development.

Water Supply: The development of this site would require off site mainlaying from a point of adequacy on larger diameter/ pressure watermains. Where off-site watermains are required, these can be provided under a water requisition scheme, under sections 40-41 of the Water Industry Act 1991, the costs of which would be borne by potential developers.

- **Increased traffic flow** (Mrs V Hiscox)

At the full planning application stage as required in Chapter 9 of the Deposit Plan, highways would require a traffic impact assessment to determine all traffic movements and junction activities.

- **Residential amenity** (Mrs V Hiscox)

With regard to the issues raised concerning the increased traffic and the resultant pollution and noise problems, this would be dealt with at the planning application stage. Any development would need to be in accordance with policy DM1 which seeks to control the potential adverse impacts which could arise from the development. The unacceptable risk of harm to health and/or local amenity from unacceptably high levels of noise, vibration, odour or light pollution is a key consideration of this policy.

With regard to the issue of privacy being compromised, this would be dealt with at the planning application stage. Any development would need to be in accordance with policy DM1 which seeks to control the potential adverse impacts which could arise from the development. The unacceptable impact upon the amenities of neighbouring occupiers is a key consideration of this policy. The design of the scheme will need to be developed in accordance with Supplementary Planning Guidance on Householder Development in Blaenau Gwent.

- **The need for relaxation facilities** (Mrs V Hiscox)

Agree. The Delivery and Implementation section of the Deposit Plan identifies that a new multi use games area (MUGA) is required in the Brynmawr ward.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: H1.14 Six Bells Colliery Site
Alternative Site Ref: AS (A) 13, AS (A) 14, AS (A) 15, AS (D) 11

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
25D.42	Welsh Government (WG) (Business, Enterprise, Technology and Science) (BETS)		Supports the allocation of land at Six Bells Colliery Site for residential purposes under Policy H1. The residential development of the site would ensure the positive use of a former brownfield site that has been the subject of reclamation.
49D.177	Pontypool Park Estate (PPE)		Amend the boundary of housing allocation H1.14 to include the former Aberbeeg Junior School site.
52D.285	A Goodenough (+ 10 signed petition)		Delete the proposed residential use at Six Bells Colliery site (upper plateau) and allocate for a primary school use.
52D.287	A Goodenough (+ 10 signed petition)		Objects to the housing allocation made on the upper plateau of the Six Bells Colliery site on the grounds of the site is better used for a new primary school; impact on the A467; and questions the need for housing.
53D.159	P Adamson		Objects to the allocation of Six Bells Colliery Site for residential development on the grounds that the site has become a valuable recreational / amenity used by many people, both local and further afield.
53D.160	P Adamson		The Six Bells Colliery Site should be included as a tourism and leisure allocation - a camping / caravan site.
56D.314	Mrs L M Evans (+ 101 signed petition)	Unsound (CE2)	Objects to the allocation for housing on the grounds that the site should be retained for recreation purposes; a popular tourist destination; ground is man-made; highway safety

			issues; biodiversity issues; impact on A467; and questions the need for housing at this site.
56D.316	Mrs L M Evans (+ 101 signed petition)	Unsound (CE2)	Delete the proposed residential use at Six Bells Colliery site (upper plateau) and allocate for a primary school use.
69D.300	Mr S Jones	Unsound (C1, CE1, CE2)	Objects to the allocation of the upper plateau of the Six Bells Colliery site for housing development.
82D.305	Six Bells Communities First (SBCF) (+171 signed petition)		Objects to the allocation of the site for housing development on the grounds that further consideration should be paid to the renewal area; loss of open space and its impact on health and well-being; impact upon the natural environment and biodiversity; not compatible with other uses in the locality; impact on the infrastructure required to develop housing; increase in cars; impact on the economy; pressure on community facilities; impact on the Six Bells Regeneration Strategy; qualifies as a rural exception site; site should be further developed for tourism and leisure; loss of connectivity; and impact on SINC.
83D.320	Mr A Thomas	Unsound (C1, CE1, CE2)	Objects to the allocation of the upper plateau of the Six Bells Colliery site for housing development.

Representation – Alternative Site AS (A) 13 – Amend housing allocation boundary to include the former Aberbeeg Junior School

No	Name	Support /Object	Comment
10AS.764	Countryside Council for Wales (CCW)	Comment	Any development at this site should protect the integrity of the SINC. Detailed design of development and open space provision will be critical to its protection.
92AS.620	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of this site however we would expect the

			Local Nature Reserve to be retained and protected within the development.
208AS.677	Mrs Y Walker	Object	The site is contaminated land; and prone to flooding. The development of this site will increase traffic congestion. The site should be kept as an industrial heritage site. The north south divide in Blaenau Gwent means fewer jobs in the north so only wealthier people can afford the houses whilst others are forced to look for work out of the area.

Representation – Alternative Sites AS (A) 14 – Delete proposed residential use and allocate for a primary school use

No	Name	Support /Object	Comment
10AS.768	Countryside Council for Wales (CCW)	Comment	Any development at this site should protect the integrity of the SINC. Detailed design of development and open space provision will be critical to its protection.
50AS.1024	The Coal Authority (CA)	Comment	Any form of development at this site whether soft or built will need to consider mining legacy and address all public safety risks before the land could be put to the proposed use.
92AS.1034	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of this site however we would expect the Local Nature Reserve to be retained and protected within the development.
208AS.862	Mrs Y Walker	Object	The site is contaminated land; and prone to flooding. The development of this site will increase traffic congestion. The site should be kept as an industrial heritage site. The north south divide in Blaenau Gwent means fewer jobs in the north so only wealthier people can afford the houses whilst others are forced to look for

			work out of the area.
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Representation – Alternative Sites AS (A) 15 – Delete proposed residential use and allocate for a tourism and leisure use

No	Name	Support /Object	Comment
10AS.769	Countryside Council for Wales (CCW)	Comment	Any development at this site should protect the integrity of the SINC. Detailed design of development and open space provision will be critical to its protection.
50AS.1025	The Coal Authority (CA)	Comment	Any form of development at this site whether soft or built will need to consider mining legacy and address all public safety risks before the land could be put to the proposed use.
92AS.1035	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of this site however we would expect the Local Nature Reserve to be retained and protected within the development.
208AS.864	Mrs Y Walker	Object	The site is contaminated land; and prone to flooding. The development of this site will increase traffic congestion. The site should be kept as an industrial heritage site. The north south divide in Blaenau Gwent means fewer jobs in the north so only wealthier people can afford the houses whilst others are forced to look for work out of the area.

Representation – Alternative Sites AS (D) 11 – Delete Allocation

No	Name	Support /Object	Comment
92AS.630	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of this site however we would expect the Local Nature Reserve to be retained and protected within the development.
208AS.703	Mrs Y Walker	Support	Support the deletion of the site on the grounds that the Six Bells site is prone to flooding

			and is contaminated in places.
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Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Support for allocation H1.14 (WG - BETS)
- Amend the boundary of H1.14 to include the former Aberbeeg Junior School site (PPE)
- Delete the proposed residential use and allocate for a primary school use (A Goodenough + petition) (Mrs L M Evans +petition)
- The site should be deleted from the Plan for the following reasons:
 - Better used for a primary school (A Goodenough + petition)
 - Impact on A467 (A Goodenough + petition)
 - Questions the need for housing (A Goodenough + petition) (L M Evans + petition)
 - Valuable recreational and tourist destination (P Adamson) (LM Evans + petition)
 - Ground is man-made (L M Evans + petition)
 - Highway safety issues (L M Evans + petition)
 - Impact on the natural environment and biodiversity (L M Evans + petition) (SBCF + petition)
 - Forms part of the Valleys Regional Park (SBCF + petition)
 - Loss of open space and ecological connectivity (SBCF + petition)
 - Focus on renewal area (SBCF + petition)
 - Not compatible with other uses (SBCF + petition)
 - Impact on infrastructure required to develop housing (SBCF + petition)
 - Increased traffic (SBCF + petition)
 - Impact on economy (SBCF + petition)
 - Pressure on community facilities (SBCF + petition)
 - Contrary to Six Bells Regeneration Strategy (SBCF + petition)
 - Site qualifies as a rural exception site (SBCF +petition)
 - Site should be further developed for tourism and leisure (SBCF + petition)
 - Impact on SINC (SBCF + petition)
- The Six Bells Colliery Site should be included as a tourism and leisure allocation - a camping / caravan site (P Adamson)

Desired Changes to LDP

- Amend the boundary to include the former Aberbeeg Junior School site (PPE)
- Delete proposed residential use and allocate for a primary school use (A Goodenough + petition) (Mrs L M Evans + petition)
- Delete the site for housing from the Plan (A Goodenough + petition) (Mrs L M Evans + petition) (P Adamson) (SBCF + petition) (Mr S Jones) (Mr A Thomas)
- Delete proposed residential use and allocation for a tourism and leisure use (P Adamson)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Comments on alternative sites AS (A) 13, AS (A) 14 and AS (A) 15 and raises the following:
 - The integrity of the SINC should be protected (CCW)
 - Mining legacy (CA)
 - LNR should be retained and protected within the development (GWT)
- Objection to AS (A) 13, AS (A) 14 and AS (A) 15 for the following reasons:
 - Contaminated land (Mrs Y Walker)
 - Prone to flooding (Mrs Y Walker)
 - Increased traffic congestion (Mrs Y Walker)
 - Kept as an industrial heritage site (Mrs Y Walker)
 - North south divide in Blaenau Gwent (Mrs Y Walker)
- Support the Deletion of H1.14 for the following reasons:
 - Prone to flooding (Mrs Y Walker)
 - Contaminated in places (Mrs Y Walker)

Desired Changes to LDP

- Delete the site from the Plan (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

There are a number of issues relating to this site these are dealt with under the following headings:

- **Support for allocation H1.14 (WG - BETS)**

Support welcomed.

- **Amend the boundary of H1.14 to include the former Aberbeeg Junior School site (PPE)Disagree.** The Council's Ecologist opposes the proposed site boundary amendment on the grounds that the former Aberbeeg junior school has been demolished to create an area of bare ground. The school site is not currently part of the candidate LNR and/or SINC. However the addition of this area to the existing housing allocation would result in an increase in the number of dwellings, this is likely to result in impacts on the adjacent LNR and SINC.

- **Delete the proposed residential use and allocate for a primary school use (A Goodenough + petition) (Mrs L M Evans + petition)**

A development brief has been prepared for the future use of the Six Bells Colliery site. The development brief establishes the capacity of the site for development and also sets out the quality and standards of design that would be expected in the redevelopment of the site.

The development brief and the Education department identify that the lower plateau of the Six Bells Colliery site is the most appropriate location for the school in terms of its size requirements as the land at the lower plateau can accommodate the proposed footprint of the school. The upper plateau is not large enough to accommodate the school building.

There is uncertainty around the feasibility of the upper plateau for a school development without significant investigation. However, it is known that because of the site topography that development costs are likely to be higher. The last time a school was constructed on site with a steep slope, an additional £200,000 of funding was required. The development also incurred significant delays and added pressures to the build programme.

It is also considered that the location of the school on the lower plateau will have less of a visual impact than if located on the upper plateau. The upper plateau proposes 40 houses which is a low density scheme in order to protect the views of the Guardian Memorial and takes into account the adjacent landscape qualities.

It is therefore fundamentally unwise to sacrifice a site which will accommodate a school to move to a site that has inherent difficulties for redevelopment. This could create a whole additional series of technical issues that may impose constraints upon the layout and involve additional costs when there is a site already suitable for the intended purpose.

- **Delete the site from the Plan** (A Goodenough + petition) (Mrs L M Evans + petition) (P Adamson) (SBCF + petition) (Mr S Jones) (Mr A Thomas) (Mrs Y Walker)

This site was previously assessed and approved under the Candidate Site Assessment Process for residential development (Candidate Site D13a).

The following reasons were raised:

- **Better used for a primary school** (A Goodenough + petition)

This issue is dealt with under the objection to delete the proposed residential use and allocate for a primary school, above.

- **Impact on A467** (A Goodenough + petition)

The A467 at Warm Turn is a Strategic Highway within the County Borough linking the A465 (T) Heads of the Valley to the M4 Corridor, it is also an important main arterial route adjoining regions of the County Borough. The said route is not operating at its capacity, and any proposed development served off this primary route will have junction/highway infrastructure and improvements that will be designed in accordance with current safety standards and capacity specification for such a residential development. The extent of such junction design/infrastructure works cannot be determined until proposed traffic flow / movement patterns have been analysed. Any such development will be the subject of a Traffic Impact Assessment and have the required Independent Road Safety Audit undertaken. There are no highway grounds of objection to such a residential development at this location.

- **Questions the need for housing** (A Goodenough + petition) (L M Evans + petition)

The Housing need to be met by the Plan is based on Assembly Government Household Projections for Blaenau Gwent which identifies the need for 3,932 dwellings between 2006-2021. A reduced figure of 3,500 is identified in the Plan to reflect the Council's plans to reduce the number of vacant properties in the area.

The figure is based on a population increase of 2,135 but only a quarter of this is as a result of migration to the area, the rest is from natural changes, that is more births than deaths. The reason a greater number of houses are needed is due to the reduction in the number of people living in each house. This reflects societal changes such as an aging population and more people choosing to live alone or in smaller households.

- **Valuable recreational and tourist destination** (P Adamson) (L M Evans + petition)

It is acknowledged that the Guardian Memorial located on the site is a popular tourist destination and a valuable recreational resource. The development of the Six Bells Colliery site is supported by a development brief which seeks to ensure that the development is sympathetic to the adjacent platform and the Guardian memorial through its indicative layout and a low density housing scheme.

- **Ground is man-made** (L M Evans + petition)

In 2006, the Authorities Consultants undertook a stability assessment of the slope at the Six Bells Colliery site. The assessment identified that the amount

of movement is small and does not appear to be causing distress to the adjacent slope.

A number of remedial options have been considered one of these will be implemented to stabilise the slope upon receipt of funding or can be undertaken as part of the plateau development. The remedial work to be undertaken will be to the satisfaction of the Local Authority before any recommendation can be given within the formal Planning application.

- **Highway safety issues** (L M Evans + petition)

The Traffic Impact Assessment required at the planning application stage should identify any existing or potential highway safety concerns, these would need to be addressed to the satisfaction of the Highway Authority, for any formal Planning Application to be recommended for approval.

- **Impact on the natural environment and biodiversity** (L M Evans) SBCF + petition)

It is acknowledged that the site is adjacent to a SINC and candidate LNR and that since mining activity ceased on the site it has become significant for its local biodiversity and landscape value. Therefore Chapter 9 of the Deposit Plan identifies that a full ecological survey including trees and vegetation and a biodiversity constraints and enhancement plan is required at the planning application stage.

The development brief also establishes a series of core design objectives to help create environments that are sustainable and exhibit a high level of design quality. One of these design objectives relates to environmental capital and seeks to maximise the use of existing site features and biodiversity enhancement.

- **Forms part of the Valleys Regional Park** (SBCF + petition)

It is acknowledged that the middle plateau of the site forms part of the Valleys Regional Park and that the Guardian Memorial is highlighted as a top ten feature. Any development of the Six Bells Colliery Site would need to be considered against policies DM15 and DM16 which seek to protect and enhance biodiversity and the green infrastructure.

- **Loss of open space and ecological connectivity** (SBCF + petition)

The middle plateau of the Six Bells Colliery Site is to be retained as open space and recreation. The development of this site for residential use will need to be in accordance with policies DM14 and DM15. Policy DM14 seeks to protect open space and where there is a loss compensatory provision will be made. Policy DM15 seeks to protect and enhance the green infrastructure network.

- **Focus on renewal area** (SBCF + petition)

Policy SP4 acknowledges the importance of continuing to work on the renewal area to improve existing housing. Paragraph 6.31 commits the Council to continuing to assess the viability of future housing renewal schemes across the County Borough and to continue to seek funding sources to improve the quality, longevity and energy efficiency of the housing stock across all tenures.

- **Not compatible with other uses** (SBCF + petition)

A development brief has been prepared for the future use of the Six Bells Colliery site. The vision of the document is to ensure that the proposed uses of the site complement each other through design and sustainability and take into account the associated constraints of the land. The development brief states that “New residential development will be set within the attractive wider setting of the valley as well as an enhanced local landscape with biodiversity interest. The development will have strong accessible links to the Six Bells community and, together with the introduction of a new school aid the regeneration of the village.”

- **Impact on infrastructure required to develop housing** (SBCF + petition)

As part of the candidate site assessment work detailed assessments have been undertaken to determine any infrastructure needs associated with the development of this site for housing. Chapter 9 of the Deposit Plan sets out the infrastructure needs.

- **Increased traffic** (SBCF + petition)

The Highway Authority has completed both a site inspection and a Highway Assessment Proforma for this LDP allocation. It is the opinion of the Highway Authority that the local highway network is more than capable of serving as access to the site, subject to localised highway improvements and any recommendations of a Traffic Impact Assessment which would need to be submitted with any planning application.

The lower density figure used to calculate the number of houses that could be accommodated at this site would also result in less traffic movements.

- **Impact on economy** (SBCF + petition)

The development of this site will not impact on the tourism economy. The Six Bells Development Brief has been prepared to ensure that the adjacent developments do not impact or conflict with the middle plateau but are complementary and create a sustainable development.

- **Pressure on community facilities** (SBCF + petition)

The Council recognises the importance of ensuring that appropriate community facilities are provided throughout Blaenau Gwent. In recognition of this need the Council has been working with the Health Authority, Education department, emergency services, social services and leisure. The Community Facilities Background Paper provides information on the latest position on this. Chapter 9 of the Deposit Plan identifies infrastructure needs associated with the development of this site. It is identified that a primary and secondary school contribution would be required and a contribution to develop existing facilities in Parc Arrael Griffin.

- **Contrary to Six Bells Regeneration Strategy** (SBCF + petition)

The plans for this site are identified in the current Unitary Development Plan. Therefore it could be argued that the regeneration strategy is contrary to the Council’s proposals for the area.

- **Site qualifies as a rural exception site** (SBCF + petition)

Disagree. To qualify as a rural exception site the site would need to be outside the urban boundary.

- **Site should be further developed for tourism and leisure** (SBCF+ petition)

This former colliery site was subject to a land reclamation scheme where the proposed after use of the top plateau was identified for housing. However, there is still potential for the middle plateau of the site to be further developed for tourism and leisure regardless of any formal allocation of the land.

- **Impact on SINC** (SBCF+ petition)

The site descriptions document, which has been prepared to provide more detail on the allocated land, reflects that the development of this site should protect the integrity of the adjacent SINC through the detailed design of the development and any open space provision will be critical to its protection. The development of this site would also need to be in accordance with Policy DM15 which seeks to maintain and enhance the biodiversity and geodiversity of sites from inappropriate development.

- **Flooding issues** (Mrs Y Walker)

The development is acceptable in terms of flood risk as it is wholly located in flood zone A. Flood Zone A is considered to be at little or no risk of fluvial or tidal/coastal flooding.

- **Contaminated land** (Mrs Y Walker)

Environmental Health at stage 2 of the candidate site assessment process identified that as the site was previously used for a contaminated use there is potential for contamination. Therefore a ground investigation and risk assessment is required at the planning application stage. This is identified as a survey requirement in Chapter 9 of the Deposit Plan.

The Coal Authority confirms that there is a record of underground working and mine entries on the site. The site investigation report would identify any remedial measures required for a housing development.

- **The Six Bells Colliery Site should be included as a tourism and leisure allocation - a camping / caravan site** (P Adamson)

This site was subject to a land reclamation scheme where the proposed after use of the top plateau was for housing. The need for camping / caravan is met at Parc Bryn Bach where there is an existing campsite and proposed development of bunkhouses. In terms of the former colliery site there is still potential for the middle plateau to be further developed for tourism and leisure regardless of any formal allocation of the land. Any proposal for development (including a camping/caravan site) would be subject to a planning application.

- **Comments on alternative sites AS (A) 13, AS (A) 14 and AS (A) 15** (CCW, CA and GWT)

The following comments were made:

- **The integrity of the SINC should be protected** (CCW)

This issue has been dealt with in the report of the Delivery and Implementation chapter (Representation No 10D.261).

- **Mining legacy (CA)**

This issue is dealt with under the report of policy DM1.

- **LNR should be retained and protected within the development (GWT)**

Disagree. The site is not located within a Local Nature Reserve designation. However, work is underway to designate a Local Nature Reserve at Six Bells by the end of 2012. Policy DM15 of the Plan seeks to maintain, enhance and provide mitigation for any loss to the LNRs.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: H1.15 Warm Turn
Alternative Site Ref: AS (D) 12**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
52D.315	A Goodenough (+10 signed petition)		Objects to the allocation on the grounds of impact on the A467; and questions the need for further housing.
56D.317	Mrs L M Evans (+101 signed petition)	Unsound (CE2)	Objects to the allocation for housing on the grounds that the site should be retained for recreation purposes; a popular tourist destination; ground is man-made; highway safety; biodiversity issues and the impact on A467.
69D.301	Mr S Jones	Unsound (C1, CE1, CE2)	Objects to the allocation of Warm Turn for housing development.
82D.306	Six Bells Communities First (SBCF) (+171 signed petition)		Objects to the allocation of the Warm Turn site for housing development on the grounds that the development.
83D.321	Mr A Thomas	Unsound (C1, CE1, CE2)	Objects to the allocation of land at Warm Turn for housing development.

Representation – Alternative Site – AS (D) 12 – Delete Allocation

No	Name	Support /Object	Comment
92AS.632	Gwent Wildlife Trust (GWT)	Support	Supports the deletion of the site from the Plan as part of the site overlaps with the Local Nature Reserve.
208AS.704	Mrs Y Walker	Support	Supports the deletion of the site from the plan as Six Bells is prone to flooding and the site is contaminated in places.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be deleted from the Plan for the following reasons: (A

Goodenough) (L M Evans + petition) (S Jones) (SBCF + petition) (Mr A Thomas):

- Impact on the A467 (A Goodenough +petition) (L M Evans + petition)
- Questions the need for further housing (A Goodenough +petition)
- Retained for recreation purposes (L M Evans + petition)
- A popular tourist destination (L M Evans + petition)
- Ground is man-made (L M Evans + petition)
- Highway safety (L M Evans + petition)
- Biodiversity issues (L M Evans + petition)

Desired Changes to LDP

- Delete the site from the Plan (A Goodenough + petition) (L M Evans + petition) (S Jones) (SBCF + petition) (Mr A Thomas)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Supports the deletion of this site for the following reasons:
 - Part of the site overlaps with the Local Nature Reserve (GWT)
 - Flooding issues (Mrs Y Walker)
 - Contaminated land (Mrs Y Walker)

Desired Changes to LDP

- Delete the site from the Plan (GWT) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan** (A Goodenough) (L M Evans + petition) (S Jones) (SBCF + petition) (Mr A Thomas)

This site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site D23) for residential development.

The following issues were raised:

- **Impact on the A467** (A Goodenough+ petition) (L M Evans + petition)

It is accepted that the A467 at Warm Turn is a Strategic Highway within the County Borough linking the A465(T) Heads of the Valley to the M4 Corridor, it is also an important main arterial route adjoining regions of the County Borough. The said route is not operating at its capacity, and any proposed development served off this primary route will have junctions/highway infrastructure and highway improvements that will be designed in accordance with current safety standards and capacity specification for such a residential development. The extent of such junction design/infrastructure works cannot be determined until proposed traffic flow /movement patterns have been analysed, any such residential development will be the subject of a Traffic Impact Assessment and have the required Independent Road Safety Audit undertaken. Therefore there are no grounds for objections to such a residential development at the above location from a highway capacity and safety standpoint.

- **Questions the need for further housing** (A Goodenough + petition)

The Housing need to be met by the Plan is based on Assembly Government Household Projections for Blaenau Gwent which identifies the need for 3,932 dwellings between 2006-2021. A reduced figure of 3,500 is identified in the Plan to reflect the Council's plans to reduce the number of vacant properties in the area.

The figure is based on a population increase of 2,135 but only a quarter of this is as a result of migration to the area, the rest is from natural changes, that is more births than deaths. The reason a greater number of houses are needed is due to the reduction in the number of people living in each house. This reflects societal changes such as an aging population and more people choosing to live alone or in smaller households.

- **Retained for recreation purposes** (L M Evans + petition)

After careful consideration the land has been allocated for residential use in the LDP in order to meet the housing requirements for the area. It should be noted that the Development Brief prepared for the former Six Bells Colliery, which is in close proximity to this site (H1.5), has identified that the middle plateau of the Six Bells Colliery site can be developed for recreation and ecology benefits, particularly as a green link.

- **A popular tourist destination** (L M Evans + petition)

It is acknowledged that the Guardian located on the Six Bells Colliery site is a popular tourist destination. The development of this site and the adjacent plateau of the Six Bells Colliery site is supported by a development brief which

seeks to maintain and protect the Guardian memorial through its indicative layout and a low density housing scheme.

- **Ground is man-made** (L M Evans + petition)

In 2006, the Authorities Consultants undertook a stability assessment of the site. The assessment identified that the amount of movement is small and does not appear to be causing distress to the adjacent slope.

A number of remedial options have been considered one of these will be implemented to stabilise the slope upon receipt of funding or can be undertaken as part of the plateau development. The remedial work to be undertaken will be to the satisfaction of the Local Authority before any recommendation can be given within the formal Planning application.

- **Highway safety** (L M Evans + petition)

The Traffic Impact Assessment required at the planning application stage should identify any existing or potential highway safety concerns, these would need to be addressed to the satisfaction of the Highway Authority, for any formal Planning Application to be recommended for approval.

- **Biodiversity issues** (L M Evans + petition)

The Biodiversity assessment undertaken at stage 2 of the candidate site assessment process identifies that there is a presence of habitat likely to support protected species, mainly scrub which would support breeding birds. Chapter 9 of the Deposit Plan requires that a full ecological survey is required including detailed breeding bird and reptile survey. A biodiversity constraints and enhancement plan is also required for this site.

- **Part of the site overlaps with the Local Nature Reserve** (GWT)
Disagree. The site is not located within a Local Nature Reserve designation. However, work is underway to designate a Local Nature Reserve at Six Bells by the end of 2012. Policy DM15 of the Plan seeks to maintain, enhance and provide mitigation for any loss to the LNRs.

- **Flooding issues** (Mrs Y Walker)

The development is acceptable in terms of flood risk as it is wholly located in flood zone A. Flood Zone A is considered to be at little or no risk of fluvial or tidal/coastal flooding.

- **Contaminated land** (Mrs Y Walker)

Environmental Health at stage 2 of the candidate site assessment process identified that there is potential for contaminated land. Therefore a ground investigation and risk assessment is required at the planning application stage. This is identified as a survey requirement in Chapter 9 of the Deposit Plan.

The Coal Authority confirms that there is a record of underground working and mine entries on the site. The site investigation report would identify any remedial measures required for a housing development.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: H1.19 Quarry Adjacent to Cwm Farm Road, Six Bells

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
79.D36	Mr S Pagett	Sound	Supports allocation H1.19 for housing.

Summary of Key Issues

The key issue identified in the representation is as follows:

- Support for housing allocation H1.19 (Mr S Pagett)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for housing allocation H1.19** (Mr S Pagett)
Support welcomed.

Policy: H1.20 Land at Farm Road, Swfrydd
Alternative Site Ref: AS (D) 13

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
74D.240	Mr A Crandon	Unsound (CE2)	Objects to the site on the grounds that: the development would devastate a green belt area; interfere with protected species; road infrastructure is inadequate and would not support the development; and Farm Road is not a viable alternative route.

Representation – Alternative Site AS (D) 13 – Delete Allocation

No	Name	Support /Object	Comment
92AS.634	Gwent Wildlife Trust (GWT)	Support	Supports the deletion of the site as part of the site is located in Cefn Bach SINC.
208AS.706	Mrs Y Walker	Support	Support the deletion of the site as the road infrastructure is inadequate; excessive number of houses proposed; increased traffic and pollution.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be deleted from the Plan for the following reasons (Mr A Crandon):
 - Devastate a green belt area
 - Interfere with protected species
 - Road infrastructure is inadequate and would not support the development
 - Farm Road is not a viable alternative route

Desired Changes to LDP

- Delete the site from the Plan (Mr A Crandon)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Supports the deletion of this site for the following reasons:
 - Part of the site is designated as a SINC (GWT)
 - Road infrastructure is inadequate (Mrs Y Walker)
 - Excessive number of houses proposed (Mrs Y Walker)
 - Increased traffic and pollution (Mrs Y Walker)

Desired Changes to LDP

- Delete the site from the Plan (GWT) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan** (Mr A Crandon) (GWT) (Mrs Y Walker)

This site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site D24) for residential development.

The following issues were raised:

- **Devastate a green belt area** (Mr A Crandon)

The site is not designated as a green belt. It is recognised in the site descriptions document that the detailed design of the development and the provision of open space is critical to this site and the landscape quality of the land.

- **Interfere with protected species** (Mr A Crandon)

The site supports acid grassland/heath mosaic with bracken and rocky outcrops as well as improved grassland. Therefore there is value for protected and priority species including bats, breeding birds, reptiles and invertebrates. Chapter 9 of the Deposit Plan requires that a full ecological survey is undertaken including habitat and vegetation, breeding birds, bats, reptiles and invertebrates.

- **Road infrastructure is inadequate and would not support the development** (Mr A Crandon) (Mrs Y Walker)

Stage 2 of the candidate site assessment process included expert assessments from a range of specialists The Highways assessment

undertaken for the candidate site assessment process considers that the site is suitable for residential development. Access to the site can be permitted via Gordon Avenue subject to local highway improvements. Secondary emergency vehicular access will also be required via Farm Road.

- **Farm Road is not a viable alternative route** (Mr A Crandon)

The highways assessment concludes that access to the site will only be permitted via Gordon Avenue and only secondary emergency vehicular access will be permitted via Farm Road.

- **Increased traffic and pollution** (Mrs Y Walker)

It is recognised in the highway assessment that Gordon Avenue is quite congested with on street parking and measures need to be taken to alleviate this problem. At the full planning application stage as required in Chapter 9 of the Deposit Plan, highways would require a traffic impact assessment to determine all traffic movements and junction activities.

With regard to pollution, any development at this site would need to be in accordance with Development Management policy 3: Air and Water Pollution.

- **Part of the site is designated as a SINC** (GWT)

It is acknowledged that part of the site, along the eastern boundary is designated as a SINC. The site descriptions document, which has been prepared to provide more detail on the allocated land, reflects that the development of this site should protect the integrity of the Cefn Bach SINC through the detailed design of the development and any open space provision will be critical to its protection. The development of this site would also need to be in accordance with Policy DM15 which seeks to maintain and enhance the biodiversity and geodiversity of sites from inappropriate development.

- **Excessive number of houses proposed** (Mrs Y Walker)

The Deposit Plan identifies that approximately 130 houses could be accommodated on the site. This indicative number is based on an average density figure of 35 dwellings per hectare. This calculation has been applied to all housing allocations in order to calculate the approximate number of dwellings that can be provided on each site.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: HC1 Housing Commitment
HC1.7 Adj Sports Ground, Gwaun Helyg**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
22D.99	Linc Cymru Housing Association Ltd (LCHA)	Unsound (CE2, CE4)	Information needs to be updated to reflect planning permission C/2009/0266: <ul style="list-style-type: none"> ▪ the overall number of units increased from 69 to 73 ▪ not a 100% affordable housing site

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Update information on HC1.7 (LCHA)

Desired Changes to LDP

- Amend number of units at HC1.7 from 69 to 73 and delete # from the table (LCHA)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

COUNCIL RESPONSE

Council Analysis

- **Update information on HC1.7 (LCHA)**

The information provided relates to the base date of April 2009 and therefore the Plan should not be changed to indicate the more recent planning permission. However, as at the base date the site was not being proposed for affordable housing, it is therefore agreed that the symbol (#) showing that it is a 100% affordable scheme be deleted. There is also a consequential

amendment to paragraph 8.29 as a result of this change.

Agree to delete (#) from HC1.7 and amend paragraph 8.29 to refer to 12 sites rather than 13.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Policy HC1.7 be amended as follows:

HC1.7 Adj Sports Ground, Gwaun Helyg # 2.92 69

That the Council recommend to the Planning Inspector that Paragraph 8.29 be amended as follows:

The 132 sites identified as likely to come forward for 100% affordable housing are as a result of planning permissions or the availability of social housing grant and land ownership. In addition all other sites will be expected to contribute towards addressing affordable housing need in accordance with Policy DM8.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: T1 Cycle Routes:

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.265	Countryside Council for Wales (CCW)	Sound (CE1)	Supports the policy in principle and considers that it meets Test of Soundness CE1.
62D.194	Caerphilly County Borough Council	Sound	Cycleways TR1.7 and TR1.11 are continued within the administrative boundary of Blaenau Gwent this is fully supported.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Support for the policy in principle (CCW)
- Support for routes TR1.7 and TR1.11 (CCBC)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for the policy in principle (CCW)**
Support welcomed.
- **Support for routes TR1.7 and TR1.11 (CCBC)**
Support welcomed.

Policy: T2 Railway Network and Station Improvements:

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
29D.80	Network Rail (NR)		Network rail will continue to support the council's future aspirations of rail transport in the Blaenau Gwent area.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Support for Rail Improvements (NR)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for Rail Improvements (NR)**
Support welcomed.

Policy: T3 Safeguarding of Disused Railway Infrastructure:

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.267	Countryside Council for Wales (CCW)	Sound (C2)	Supports the policy in principle and considers that it meets Test of Soundness C2.
63D.79	Pontypool and Blaenavon Railway Co (P&BRC)	Sound	Wishes to improve the justification by the inclusion of 3 new sections of wording.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- Support for policy (CCW)
- Suggested new wording for policy title and reasoned justification (P&BRC)

Desired Changes to LDP

- The following changes are requested (P&BRC):
T3 Safeguarding *and development* of Disused Railway Infrastructure
Disused railway infrastructure east of Brynmawr will be protected from development that would compromise its future transport use.

This disused railway line could potentially be re-used for transport purposes. In line with national planning policy, this route will be safeguarded from development as there is a realistic prospect of its reuse for transport purposes in the future. The Council will *actively* support the use of the land *for the development of a railway line from existing Pontypool and Blaenavon Railway to Brynmawr and also* in the interim, for pedestrian, cycle and bridle routes including shared facilities.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for policy (CCW)**

Support welcomed.

- **Suggested new wording for policy title and reasoned justification (P&BRC)**

Disagree. The proposed wording does not reflect the Council's position or add clarity to the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: T4 Improvements to Bus Services

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10.D.268	Countryside Council for Wales	Sound (CE1)	Supports the policy in principle and considers that it meets Test of Soundness CE1

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Supports the policy in principle (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Supports the policy in principle (CCW)**
Support welcomed.

Policy: T5.1 Construction of a Peripheral Distributor Road through 'The Works'
Alternative Site Ref: AS (A) 03 Online improvements between the PDR & A465

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
44D.71	Mrs L Roberts	Unsound (CE2)	Concerned with the alignment of the Peripheral Distributor Road in proximity to the new primary school on grounds that it will be unsafe for families and children walking from Newtown and other housing areas to access the school.

Representation – Alternative Sites

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- Concerns regarding safety of children walking to school (Mrs L Roberts)

Desired Changes to LDP

- Change not clearly stated (Mrs L Roberts)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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COUNCIL RESPONSE

Council Analysis

- **Concerns regarding safety of children walking to school** (Mrs L Roberts)

The new Primary School will be directly accessed off a traffic calmed 20mph road. Future improvements to the wider road network such as the proposed Peripheral Distributor Road will be subject to careful design and consultation taking into full account the need to safely accommodate pedestrian users.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: T6 Regeneration Led Highway Improvements
Paragraphs 8.41-8.45**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
83D.110	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	Should not be referring to Kilometers.
83D.76	Mr A Thomas	Unsound (CE3, CE4)	Requests priority be given to improvements to A467 (T6.4) before (T5.1) and (T6.2) as otherwise will lead to unacceptable increase in congestion at Warm Turn.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Use of kilometres (Mr A Thomas)
- Priority to be given to improvements to A467 (Mr A Thomas)

Desired Changes to LDP

- Use miles (Mr A Thomas)
- Prioritise improvement to A467 before improvements to A4046 and the peripheral distributor road (Mr A Thomas)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing

circumstances.

COUNCIL RESPONSE

Council Analysis

- **Use of kilometres** (Mr A Thomas)

Agree. The kilometre distance will be converted to miles.

Amend paragraph 8.41 by changing 40km to 25 miles

- **Priority to be given to improvements to A467** (Mr A Thomas)

Disagree. In line with the road hierarchy identified by the Strategic Highway Network within the SEWTA Regional Transport Plan, improvements to the A4046 are to be prioritised. Improvements to the A4048 and A467 will be pursued and implemented where possible. The road improvements to the A4046 would not lead to an unacceptable increase in congestion at Warm Turn.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Paragraph 8.41 be amended as follows:

The A465 is identified as part of the Trans European Network (TENS) and is a key strategic link in the national trunk road network connecting West Wales with the Midlands and the North of England. It also forms a major sub regional artery along the Heads of the Valleys corridor from Swansea in the west to Abergavenny in the east. The planned dualling of **40km 25 miles** of road is significant, as indeed is the potential impact on communities situated along and adjacent to the Heads of the Valleys corridor. There is the expectation that the improvement will generate new and sustained economic activity and investment.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: EMP1.2 Land at Tredegar Business Park

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
25D.43	Welsh Government (WG) Department for Business, Enterprise Technology and Science (BETS)		Supports the identification of land at Tredegar Business Park for employment purposes under policy EMP1.

Summary of Key Issues at Deposit Stage

The key issue identified in the representation are as follows:

- Support for allocation EMP1.2 (WG - BETS)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for allocation EMP1.2 (WG - BETS)**
Support welcomed.

Policy: EMP1.3 Land at Rising Sun Industrial Estate

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
25D.40	Welsh Government (WG) Department for Business, Enterprise Technology and Science (BETS)		Supports the allocation of land at Rising Sun Industrial Estate for employment purposes under policy EMP1.

Summary of Key Issues at Deposit Stage

The key issue identified in the representation are as follows:

- Support for allocation EMP1.3 (WG - BETS)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for allocation EMP1.3 (WG - BETS)**
Support welcomed.

Policy: EMP1.8 Crown Business Park Platform A

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Support /Object	Comment
25D.37	Welsh Government (WG) Department for Business, Enterprise, Technology and Science (BETS)		Supports the allocation of land at Crown Business Park Platform A for employment purposes under policy EMP1.
10D.271	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Consider that development at this site and the proposed roadside services (part of allocation 'MU1') will undermine the existing physical separation between Tredegar and Ebbw Vale and increase the potential for and perception of coalescence between them.
10D.272	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Concerns about cumulative impact from development at allocations; MU1, EMP1.8 and T6.1 on significantly reducing the area of green open space and potentially impairing ecological connectivity. EMP1 is not consistent with DM15 and DM16.
10D.273	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Concerns about potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC to area West and South of Ebbw Vale.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Support for allocation EMP1.8 (WG - BETS)
- EMP1.8 and MU1 will undermine the green wedge (CCW)
- Concern regarding loss of green space at north west of site and the impact on ecological connectivity and foraging opportunities for Bats (CCW)

Desired Changes to LDP

- Extend the green wedge (CCW)
- Chapter 9 should highlight the potential for in-combination effect of these allocations on SAC features, and make provision to ensure that any development at these allocations should provide for appropriate bat movement/commuting routes (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

COUNCIL RESPONSE

Council Analysis

- **Support for allocation EMP1.8 (WG BETS)**

Support Welcomed.

- **EMP1.8 and MU1 will undermine the green wedge (CCW)**

Following a meeting with CCW it has been agreed to widen the green wedge in this area. The boundary of the green wedge should be amended to extend to the HoV Road, incorporate part of EMP1.8 employment allocation, an area of open space immediately south of the HoV Road, together with land identified as open space at Bryn Serth. The revised boundary will reinforce the buffer between the two settlements of Ebbw Vale and Tredegar and improve connectivity. The amendments to the employment allocation and green wedge boundary is shown on the Maps 5 and 6 attached at Appendix 3.

- **Concern regarding loss of green space at north west of site and the impact on ecological connectivity and foraging opportunities for Bats (CCW)**

Following a meeting with CCW it has been agreed that the green wedge will be widened in this area. It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, MU1, EMP1.5 and T6.1. These changes together with the wording changes being suggested to MU1 addresses the concerns raised by CCW.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Proposals Map be amended to change the boundary of employment allocation EMP1.8 in order to widen Green Wedge ENV1.2 Tredegar and Ebbw Vale to prevent coalescence of these two settlements and improve connectivity.

The amendments to the employment allocation is shown on Map 5 attached at Appendix 3.

Reason for Recommendation

The proposed change is not substantive but would extend the Green Wedge to prevent coalescence of settlements and improve connectivity. Importantly the change would not affect the soundness of the plan.

Policy: EMP1.9 Crown Business Park Platform B

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
25D.39	Welsh Government (WG) Department for Business, Enterprise Technology and Science (BETS)		Supports the allocation of land at Crown Business Park Platform B for employment purposes under policy EMP1.

Summary of Key Issues at Deposit Stage

The key issue identified in the representation are as follows:

- Support for allocation EMP1.9 (WG - BETS)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for allocation EMP1.9 (WG – BETS)**
Support welcomed.

Policy: ED1.2 Lower Plateau Six Bells Colliery Site
Alternative Site Ref: AS (D) 14, AS (A) 18

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
18D.81	Environment Agency Wales (EA)	Unsound (C2, CE2)	Allocation ED1.2 is located in flood zone C2. A primary school use which is classed as highly vulnerable should not be allocated within this zone. The SFCA has not demonstrated whether the consequences of flooding are capable of being managed in an acceptable way.
48D.310	BGCBC – Education Department	Sound	Supports the proposed allocation of land on the lower plateau of Six Bells Colliery site for educational purposes.
52D.286	A Goodenough (+ 10 signed petition)		Objects to the allocation of the lower plateau of Six Bells Colliery site for a primary school on the grounds that the primary use of the site is one of tourism and leisure which should be retained.
52D.288	A Goodenough (+ 10 signed petition)		Delete the primary school use on the lower plateau of the Six Bells Colliery site and allocate the site, as well as the rest of the Six Bells Colliery site (apart from the upper plateau) for tourism and leisure.
56D.318	Mrs L M Evans (+101 signed petition)		Delete the primary school use on the lower plateau of the Six Bells Colliery site and allocate the site, as well as the rest of the Six Bells Colliery site (apart from the upper plateau) for tourism and leisure.
56D.1050	Mrs L M Evans (+101 signed petition)		Objects to the allocation of the lower plateau of Six Bells Colliery site for a primary school on the grounds that the primary use of the site is one of tourism and leisure which should be retained.

69D.302	Mr S Jones		Supports the allocation of the lower plateau of the Six Bells Colliery site for a primary school provided that specific consultation and involvement on the schools development is provided.
82D.307	Six Bells Communities First (SBCF) (+171 signed petition)		Supports the creation of a new primary school provided that the site does not negatively impact upon the recent community and tourist developments, is developed as an eco-friendly community focused school and infrastructure requirements are provided. The Board also requests confirmation of when the development is likely to be developed.
82D.389	Six Bells Communities First (SBCF) (+171 signed petition)		The representation raises the issue of the lower plateau of the former colliery site being located in a flood plain and such consideration should be taken for any development of this site.
83D.113	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	The LDP is misleading by stating that the Six Bells Colliery site is likely to be developed in 2014.
83D.114	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	Is the proposal achievable considering no commitment has been made yet and the issues with low school numbers in other schools in the area.
83D.319	Mr A Thomas	Unsound (C1, CE1, CE2)	Supports the allocation of the lower plateau of Six Bells Colliery site for a primary school provided that full consultation and involvement on the schools development and its actual location is provided.

Representation – Alternative Site AS (D) 14 – Delete Allocation

No	Name	Support /Object	Comment
18AS.819	Environment Agency Wales (EA)	Comment	The site lies almost entirely in flood zone C2. The actual consequences of flooding are still unknown therefore

			<p>additional work needs to be undertaken.</p> <p><u>Sewerage Capacity</u> Ensure that adequate sewerage infrastructure is in place to support new development and allocations are deliverable.</p> <p><u>Water Abstraction</u> To ensure allocations are feasible and deliverable ensure sufficient water is available to supply future development.</p> <p><u>Culverting</u> Watercourses should be left as open channels and not culverted as part of development.</p> <p><u>Buffer Zones</u> Request a 7 metre buffer zone between any proposed development and any watercourses for access and maintenance purposes.</p>
92AS.640	Gwent Wildlife Trust (GWT)	Support	Supports the deletion of the site as part of the site overlaps with the Local Nature Reserve.
208AS.705	Mrs Y Walker	Comment	The Six Bells Colliery site is prone to flooding therefore a flood and environmental impact assessment should be carried out. The site is also contaminated in places.

Representation – Alternative Site AS (A) 18 – Delete primary school and allocate the remainder of Six Bells Colliery Site (apart from Upper Plateau) for tourism and leisure use

No	Name	Support /Object	Comment
208AS.865	Mrs Y Walker	Comment	The Six Bells Colliery site is prone to flooding therefore a flood and environmental impact assessment should be carried out. The site is also contaminated in places.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be deleted from the Plan for the following reasons:
 - Located in flood zone C2 and is highly vulnerable development (EA)
 - SFCA not demonstrated that the consequences of flooding are capable of being managed (EA)
 - Primary use of the site is tourism and leisure which should be retained (A Goodenough + petition) (Mrs L M Evans + petition)
- Support for allocation ED1.2 (BGCBC)
- Delete primary school use and allocate the remainder of Six Bells Colliery Site (apart from Upper Plateau) for Tourism and Leisure (A Goodenough + petition) (Mrs L M Evans + petition)
- Supports for ED1.2 provided that specific consultation and involvement on the schools development is provided (SBCF + petition) (Mr S Jones) (Mr A Thomas)
- The site should not negatively impact upon the recent community and tourist developments (SBCF + petition)
- The site is located in a flood plain and such consideration should be taken for any development of this site (SBCF + petition)
- Confirmation of when the development is likely to be developed (SBCF + petition) (Mr A Thomas)
- Questions if the proposal is achievable given no commitment has been made yet and the issues with low school numbers (Mr A Thomas)

Desired Changes to LDP

- Delete the site for primary school from the Plan (EA) (A Goodenough + petition) (Mrs L M Evans + petition)
- Delete primary school use and allocate the remainder of the site (apart from Upper Plateau) for Tourism and Leisure (A Goodenough + petition) (Mrs L M Evans + petition)
- Change not clearly stated (SBCF)
- Change not clearly stated (Mr A Thomas)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the deletion of the site from the Plan for the following reasons:
 - Part of the site overlaps with the Local Nature Reserve (GWT)
- Comments on alternative sites AS (D) 14 and AS (A) 18 and raises the following:
 - The site lies within flood zone C2 additional work is required (EA, Mrs Y Walker)
 - Sewerage capacity (EA)
 - Water abstraction (EA)
 - Culverting (EA)
 - Buffer zones (EA)
 - The site is also contaminated in places (Mrs Y Walker)

Desired Changes to LDP

- Delete the site from the Plan (GWT)

COUNCIL RESPONSE

Council Analysis

There are a number of issues relating to this site these are dealt with under the following headings:

- **Delete the site from the Plan** (EA) (A Goodenough + petition) (Mrs L M Evans + petition)

The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site D11) for a primary school use.

The following reasons were raised:

- **Located in flood zone C2 and is highly vulnerable development** (EA) (Mrs Y Walker)

It is accepted that the Lower Plateau of the Six Bells Colliery site is located within flood zone C2 and a primary school use is classified as highly vulnerable development according to TAN 15. A further Strategic Flood Consequence Assessment was commissioned by Blaenau Gwent to model the flood risk in this area. The preliminary results identified that only the northern and eastern extremity of the site floods. It is, therefore, possible to locate the school building outside the flood risk area. To ensure there is sufficient land available to provide the required facilities it is suggested that the boundary of the allocation is extended to the south of the site. A preliminary report will be made available from the 19th of January with the full report being published on the 2nd of February.

- **SFCA not demonstrated that the consequences of flooding are capable of being managed** (EA) (Mrs Y Walker)

The Preliminary Strategic Flood Consequence Assessment identifies that the

school can be accommodated on land outside of the flood risk area and that the consequences of flooding are capable of being managed.

- **Primary use of the site is tourism and leisure which should be retained** (A Goodenough + petition) (Mrs L M Evans + petition)

The development of tourism and leisure i.e. the Guardian, has already taken place on the middle plateau without any formal allocation in the Unitary Development Plan. There is no need for the land to be allocated for tourism and leisure in the LDP because there is potential for it to take place, subject to satisfying planning policies, without any formal allocation of the land. This former colliery site was subject to a land reclamation scheme where the land was prepared for development. The proposed after use of the lower plateau has been identified for a community facility.

- **Part of the site is a Local Nature Reserve** (GWT)

Disagree. The site is not located within a Local Nature Reserve designation. However, work is underway to designate a Local Nature Reserve at Six Bells by the end of 2012. Policy DM15 of the Plan seeks to maintain, enhance and provide mitigation for any loss to the LNRs.

- **Support for allocation ED1.2** (BGCBC)

Support welcomed.

- **Delete primary school use and allocate the remainder of Six Bells Colliery Site (apart from Upper Plateau) for Tourism and Leisure** (A Goodenough + petition) (Mrs L M Evans + petition)

This former colliery site was subject to a land reclamation scheme, which prepared the land for development by creating three plateaus. The proposed after use of the lower plateau has been identified as a community facility. There is no need for formal allocation of the middle plateau for tourism and leisure as there is potential for this to take place regardless of any formal allocation. This can be evidenced in the establishment of a popular tourist attraction on the middle plateau i.e. the Guardian.

- **Supports for ED1.2 provided that specific consultation and involvement on the schools development is provided** (SBCF + petition) (Mr S Jones) (Mr A Thomas)

Support welcomed. The Education Department will fully engage with the local community and organisations as is carried out in all new school developments.

- **The site should not negatively impact upon the recent community and tourist developments** (SBCF + petition)

Agree. It is acknowledged that the Guardian Memorial located on the site is a popular tourist attraction and a valuable recreational resource. The development of the Six Bells Colliery site is supported by a development brief which seeks to ensure that the development is sympathetic to the adjacent platforms and the Guardian Memorial through its indicative layout and design.

- **The site is located in a flood plain and such consideration should be taken for any development of this site** (SBCF + petition)

It is accepted that the lower plateau of the Six Bells Colliery site is located

within flood zone C2. A Stage 3 Strategic Flood Consequence Assessment is underway to show that the site is acceptable for allocation as an educational facility.

- **Confirmation of when the development is likely to be developed** (SBCF +petition) (Mr A Thomas)

The development of the lower plateau for a school site is dependent on funding being achieved. The funding arrangements for the development of schools has changed in that match funding needs to be provided. Therefore it is considered more realistic for the site to be developed in the 3rd phase of the plan (2016-2021).

Agree to update the last sentence of paragraph 8.56 to reflect when the development is likely to be developed:

The new school is likely to be developed in ~~2014~~ *the 3rd phase of the Plan (2016-2021)*.

And update the Delivery and Implementation Chapter to read:

~~Phase 3 2-build scheduled in 2013-2014~~

- **Questions if the proposal is achievable given no commitment has been made yet and the issues with low school numbers** (Mr A Thomas)

At present primary education in Six Bells is delivered by two schools namely Bryngwyn and Queen Street. The Education and Leisure Department identifies that the school is not only required to reduce surplus places but is also required due to the condition of the current schools. An appraisal into the condition of the buildings at Bryngwyn and Queen Street primary schools has been undertaken which found that the current buildings have no scope for incorporating the foundation phase, the buildings are in a poor state of repair, there is limited outdoor space, and limited opportunities to incorporate biodiversity. Therefore it is considered more feasible for a new school to be built on the lower plateau which can incorporate all of these statutory requirements of a 21st century school. .

A commitment to delivering a new school in Six Bells has been made in the School Organisation Plan.

- **Comments on alternative sites AS (D) 14, AS (A) 18 (EA)** (Mrs Y Walker)

- **Sewerage Capacity** (EA)

Dwr Cymru Welsh Water was consulted at stage 3 of the candidate site assessment process where the sewerage capacity was not identified as an issue for this site.

- **Water Abstraction** (EA)

Dwr Cymru Welsh Water identified that the site would require off site mainlaying from a point of adequacy on larger diameter/pressure water mains.

- **Culverting** (EA)

This is being investigated through the Strategic Flood Consequence Assessment.

▪ **Buffer Zones (EA)**

Agree to update the site descriptions document to ensure that a 7 metre buffer zone between any proposed development and any watercourses for access and maintenance purposes is provided on site.

▪ **The site is contaminated in places (Mrs Y Walker)**

Environmental Health at stage 2 of the candidate site assessment process identified that as the site was previously used for a contaminated use there is potential for contamination. Therefore a ground investigation and risk assessment is required at the planning application stage.

For clarity, the survey requirements table should be updated in Chapter 9 to reflect that a ground investigation and risk assessment is required at the planning application stage for this site (Rep No 10D.545).

The Coal Authority confirms that there is a record of underground workings on the site. The site investigation report would identify any remedial measures required for an educational facility.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Proposals Map be changed to extend the boundary of ED1.2 to the south.

The amendment to the route is shown on Map 13 attached.

That the Council recommend to the Planning Inspector that paragraph 8.56 be updated to read:

The new school is likely to be developed in 2044 *the 3rd phase of the Plan (2016-2021).*

That the Council recommend to the Planning Inspector that the Delivery and Implementation Chapter to updated to read:

Phase 3 2 build scheduled in 2013-2014

Reason for Recommendation

The proposed change is not substantive but would improve the ability of the site to accommodate the school. Importantly the change would not affect the soundness of the plan.

Policy: CF1 Community Centre

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
15D.352	Mr N Morris		It is noted that no land has been identified for youth clubs in the Plan. Every town should be designated a youth club/café/social meeting place in order to cater for the youth of today.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- No land has been identified for youth clubs in the Plan (Mr N Morris)

Desired Changes to LDP

- Change not clearly stated (Mr N Morris)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **No land has been identified for youth clubs in the Plan (Mr N Morris)**
The Council acknowledges the importance of ensuring that the provision of youth centres has been taken into account. In recognition of this, the Council sought to obtain information on the provision of community and youth centres, It was discovered that no central database was held. However information from the Communities First Partnership identified the current and future provision of community and youth centres in Blaenau Gwent. The Community Facilities Background Paper provides information on this.

It is acknowledged that no land has been identified in the Plan for youth clubs. However the Background Paper does identify future redevelopment projects.

The projects identified were small scale redevelopment projects and will be dealt with through development management policies.

Policy DM12 also recognises the importance of community and leisure facilities to the health, social and economic well being of the settlements within the County Borough and therefore seeks to protect such facilities.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: TM1 Tourism and Leisure

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
15D.354	Mr N Morris		Lack of hotel accommodation in Blaenau Gwent.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Lack of hotel accommodation in Blaenau Gwent (Mr N Morris)

Desired Changes to LDP

- Change not clearly stated (Mr N Morris)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Lack of hotel accommodation in Blaenau Gwent** (Mr N Morris)

The Plan allocates land at Parc Bryn Bach for a hotel use. It is acknowledged that more hotel accommodation is needed to take full advantage of the potential for tourism development in this area. However conclusions from a market assessment prepared for the Parc Bryn Bach hotel allocation found that:

'The UK economic recovery remains relatively weak and the outlook uncertain. As a result active buyers still have a cautious approach to assessing hotel acquisition opportunities and new hotel development, particularly in provincial locations. Obtaining funding and the trading environment for provincial hotels development remain difficult. These factors have also suppressed demand for new, non primary hotel sites.

It should be noted that budget hotels on roadside locations are often developed in conjunction with a separate restaurant building. Typically, such restaurants will be in the fast food/ drive thru/ chain end of the market, e.g. McDonalds, Little Chef etc. In areas with a higher population density, budget hotels are often developed alongside a public house, e.g. Travelodge work closely with Marstons Pub Company and the

Whitbread owned Premier Inn often utilise their own stable of pub/ restaurant brands including Beefeater and Brewers Fayre'.

In light of this and the fact that every allocation in the Plan has to be supported by a robust evidence base, demonstrate deliverability and viability, and that the Council's Estates department are not aware of any interest at the moment from hotel companies looking to develop in the Brynmawr area, it is recommended that no change is made to this allocation.

Tourism and leisure initiatives are encouraged and supported in policy SP8. This is a key sector which will help to help diversify and improve the economy.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: TM1.1 Eastern Valley Slopes

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.277	Countryside Council for Wales (CCW)	Unsound (CE1)	Serious concerns about the proposed environmental improvements and tree planting at Eastern Valley Slopes. 9 SINCS could be lost or degraded as a result of poorly planned tree planting operations. Appropriate buffer zones should be provided. Concerns over environmental improvements and tree planting.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Concerns over environmental improvements and tree planting (CCW)

Desired Changes to LDP

- Paragraph 8.60 should be amended to include reference to the 9 SINCS on the Eastern Valley Slopes allocation and the need to design any planting schemes to maintain their ecological interest (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
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COUNCIL RESPONSE

Council Analysis

- **Concerns over environmental improvements and tree planting (CCW) Disagree.** It should be noted that this project is being driven by the Countryside Section with input from the Ecologist in recognition of the high ecological value of the land. Ecological surveys have been carried out which have informed the environmental improvements and tree planting at the

Eastern Valley Slopes. All woodland planting has now been completed Any future environmental improvements will be carried out to enhance access to the site for educational and recreational purposes and would be subject to ecological surveys to protect the integrity of the SINCS. The value of the SINCS (including the ponds) is well recognised and they will be managed and enhanced.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: TM1.2 Garden Festival

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.278	Countryside Council for Wales (CCW)	Unsound (CE1)	Detailed landscaping proposals should be designed to ensure that the ecological interests of the 3 SINCS, (Land Surrounding Wetland Centre, Festival Lake and Ebbw River South Section), are maintained.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Landscaping should ensure ecological interests of 3 SINCS are maintained (CCW)

Desired Changes to LDP

- Change not clearly stated (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
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COUNCIL RESPONSE

Council Analysis

- **Landscaping should ensure ecological interests of 3 SINCS are maintained (CCW)**

Noted. Policy DM2 Design and Placemaking criterion g ensures that landscaping and planting, where appropriate, is integral to any development and enhances the site and the wider context. Paragraph 7.23 of Policy DM2 explains that the landscape and natural environment are important local resources where the key is to incorporate areas of established importance (such as in this case the 3 SINCS) and ensure they are protected and enhanced, for example, through appropriate planting. Landscaping design will

be appropriate and consultation carried out with relevant bodies to maintain the ecological interests of the 3 SINCS.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: TM1.3 Blue Lakes

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.279	Countryside Council for Wales (CCW)	Unsound (CE1)	Development will lead to direct loss of SINC habitat and any retained will be lost or damaged due to recreational activities.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Direct loss of SINC habitat and loss/damage to retained habitats (CCW)

Desired Changes to LDP

- Change not clearly stated (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
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COUNCIL RESPONSE

Council Analysis

- **Direct loss of SINC habitat and loss/damage to retained habitats (CCW)**

The Council and the proposed developers of the site are aware of the importance of the SINC including its mosaic of habitats. Any proposed development would be required to protect and enhance the biodiversity through appropriate management of the site. CCW would be contacted regarding any proposals, including the fishing stock levels that may impact on the biodiversity of the lake in order to ensure that biodiversity is protected and enhanced.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: TM1.5 Parc Bryn Bach
Alternative Site Ref: AS (D) 06

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
81D.69	Mr N Smith MP		Potentially good idea, however, concerned about vehicular access and safety on the road past the primary school.
85D.142	Mrs H Milne		The proposal to develop a hotel at Parc Bryn Bach is a bad idea as it would damage the gentle ecosystem.

Representation – Alternative Site AS (D) 06 – Delete Allocation

No	Name	Support /Object	Comment
92AS.629	Gwent Wildlife Trust (GWT)	Support	The site is designated as a SINC we therefore object to the development of this site.
196AS.656	Blaenau Gwent County Borough Council (BGCBC.)	Object	This site has been recognised as a possible hotel for a number of years, we would require the site to be retained for a hotel development as this is an ideal location, adjacent to the A465.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Support although consideration should be given to vehicular access and Road safety (Mr N Smith MP)
- The site should be deleted from the Plan for the following reason (Mrs H Milne):
 - Damage to ecosystem

Desired Changes to LDP

- Delete the site for tourism and leisure from the Plan (Mrs H Milne)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the deletion of the site from the Plan for the following reason:
 - SINC (GWT)
- Object to the deletion of the site for the following reason:
 - Ideal location (BGCBC)

Desired Changes to LDP

- Delete the site from the Plan (GWT)
- Retain the site in the Plan (BGCBC)

COUNCIL RESPONSE

Council Analysis

- **Support although consideration should be given to vehicular access and road safety** (Mr N Smith MP)

Support welcomed. This site was assessed as part of the candidate site assessment process and found acceptable in terms of highways including road safety at the school. There has been a Traffic Calming Scheme implemented along Merthyr Road adjacent to Bryn Bach Primary School to help alleviate any perceived road safety issues at this location. Overall it was concluded that there is good access to the site and the Highway network can accommodate this proposal.

- **The site should be deleted from the Plan** (Mrs H Milne) (GWT)

This site was previously assessed and approved under the Candidate Site Assessment Process (candidate site A39).

Leisure Services required that the site be allocated in the LDP for tourism and leisure in order to support the development of the site and as part of the regeneration of Blaenau Gwent. There is a shortage of accommodation in the area and this site has been identified for such a development. Attempts are being made by staff from Leisure Services to attract hoteliers to Parc Bryn Bach. Any development would be in keeping with the setting and take into account the environmental designations (SINC and LNR) applicable on the site.

The following issues were raised:

▪ **Damage to ecosystem** (Mrs H Milne)

Any development proposal will be informed by an ecological assessment to ensure protection and enhancement of biodiversity.

▪ **SINC** (GWT)

GWT objects to the development as the site is designated as a SINC. It is acknowledged that the majority of the site allocated for tourism and leisure (TM1.5) including the hotel, falls within a SINC designation (ENV3.47). Whilst it is important to protect the biodiversity of SINCS from inappropriate development, it should be noted that in accordance with national planning policy, designation of SINCS will not preclude socio-economic activities. However, any development proposal will be informed by an ecological assessment to ensure protection and enhancement of biodiversity.

Conclusion

The Council considers that the site is appropriate for allocation for tourism and leisure.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: ENV1 Green Wedges

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.1051	Welsh Government (WG)		The plan's written statement should clarify the relationship between this plan area and its neighbours. It would be useful for the plan to clarify its relationship with the existing and emerging LDPs of neighbouring plan areas with regard to the mapping of green wedges.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Clarification of mapping of green wedges with neighbouring authorities (WG)

Desired Changes to LDP

- Change not clearly stated (WG)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Clarification of mapping of Green Wedges with neighbouring authorities (WG)**

Disagree. The two green wedges in Blaenau Gwent are not on the boundaries of any of the neighbouring authorities. Neither are there any green wedges on the boundaries of neighbouring authorities. Therefore there is no issue with green wedges and no need for the plan to clarify how the mapping of the green wedge areas meets with neighbouring authorities.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: ENV1.2 Tredegar and Ebbw Vale Green Wedge
Alternative Site Ref: AS (A) 05**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.280	Countryside Council for Wales (CCW)	Unsound (C2)	Concerned at limited northern area of green wedge between Ebbw Vale and Tredegar, ENV 1.2. Designation should be broader & extend further northwards up to the southern edge of the HoV Road (a logical physical boundary) to prevent coalescence.

Representation – Alternative Site AS (A) 05 – Amend the green wedge

No	Name	Support /Object	Comment
10AS.758	Countryside Council for Wales (CCW)	Support	Welcome the opportunity of further discussion to consider the potential for revising the boundary of the green wedge.
208AS.673	Mrs Y Walker	Object	Disagree with altering the green wedge since the CCW's comments are very vague. CCW are supposed to protect rural Wales not allow unnecessary developments to be forced on the community via the back door.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Need to extend the green wedge (CCW)

Desired Changes to LDP

- Extend boundary of green wedge further northwards up to the southern edge of the HoV Road (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
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SA/SEA/HRA

No evidence was submitted

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Need for a meeting to discuss boundary of Green Wedge (CCW)
- Objection to the site amendment (Mrs Y Walker)

Desired Changes to LDP

- No change to the Plan (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **Need to extend the green wedge (CCW)**

Agree. The boundary of the green wedge should be amended to extend to the HoV Road, incorporate part of the employment protection area (EMP1.8), an area of open space immediately south of the HoV Road, together with land identified as open space at Bryn Serth. It should be noted that the land at Bryn Serth has been allocated as MU1 in the Plan and has been granted planning permission subject to signing of a S106 agreement. The indicative plan layout for the development indicates an area of open space to the north of the site, which, it has been agreed with the owners, can be included within the overall green wedge designation. The revised boundary (which was agreed in a meeting with CCW on 27th October 2011) will reinforce the buffer between two settlements i.e. Ebbw Vale and Tredegar and improve connectivity. It is agreed to amend the boundary of the green wedge as identified on Map 6 attached at Appendix 3.

- **Objection to the site amendment (Mrs Y Walker)**

The representor appears to misunderstand the proposed amendment which

would increase the green wedge not allow development.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Proposals Map be amended to extend the boundary of the Green Wedge ENV1.2 Tredegar and Ebbw Vale to prevent coalescence and improve connectivity.

The amendments to the Green Wedge is shown on Map 6 attached at Appendix 3.

Reason for Recommendation

The proposed change is not substantive but would extend the Green Wedge to prevent coalescence and improve connectivity. Importantly the change would not affect the soundness of the plan.

Policy: ENV2 Special Landscape Areas

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.1052	Welsh Government (WG)		The plan's written statement should clarify the relationship between this plan area and its neighbours. It would be useful for the plan to clarify its relationship with the existing and emerging LDP of neighbouring plan area with regard to the mapping of Special Landscape Areas.
10D.289	Countryside Council for Wales (CCW)	Sound (C2)	Supports the policy and considers that it meets Test of Soundness C2.
12D.20	Torfaen County Borough Council (TCBC)		Lack of consistency between SLA boundaries of Torfaen Council and BGCBC. Blaenau Gwent SLA study details show the existing SLAS in the Adopted Torfaen Local Plan (2000) and not the updated and new boundaries developed for the LDP using the agreed methodology.
62D.33	Caerphilly County Borough Council (CCBC)	Sound	Supports designation of Special Landscape Areas as they have been designated using the agreed regional methodology which was developed in conjunction with CCW and TACP.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Clarification of mapping of Special Landscape Areas with neighbouring authorities (WG)
- Support for policy ENV2 (CCW) (CCBC)
- Lack of consistency between SLA boundaries of Torfaen Council and BGCBC (TCBC)

Desired Changes to LDP

- Change not clearly stated (WG)
- Change not clearly stated (TCBC)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified.

COUNCIL RESPONSE

Council Analysis

- **Clarification of mapping of Special Landscape Areas with neighbouring authorities** (WG)

Agree. The plan needs to clarify how it's mapping of the Special Landscape Areas meets with neighbouring authorities.

Insert a new paragraph under paragraph 8.73 as follows:

Brecon Beacons National Park do not identify any Special Landscape Areas. Blaenau Gwent's SLA boundaries match Caerphilly's SLAs and VILLs but do not reflect those identified in Torfaen as they used a different approach by relying entirely on LANDMAP. Although Blaenau Gwent used LANDMAP it supplemented this with additional local criteria.

- **Lack of consistency between SLA boundaries** (TCBC)

TCBC object to the lack of consistency between the SLA boundaries in Blaenau Gwent and Torfaen as they claim that they reflect the old boundaries in the Local Plan.

In March 2007 consultants 'TACP' were appointed by a consortium of south-east Wales local authorities, including Blaenau Gwent, to develop criteria for the designation of Special Landscape Areas (See report – Development of criteria for Special Landscape Area designation for South East Wales Local Authorities (2007)).

In May 2008 the Council appointed a Landscape Architect to carry out a review of the Special Landscape Areas in Blaenau Gwent. The consultant used the criteria from the regional study but also applied local criteria as there were issues with the Landmap data for Blaenau Gwent. The CCW Guidance Note 1 allows for local criteria to be used in defining proposed SLAs.

The report 'Proposals for Designation of Special Landscape Areas in Blaenau Gwent (2009) contains a full explanation of how SLAs have been designated in Blaenau Gwent (see p. 7-13 for criteria used).

Therefore Blaenau Gwent used the agreed methodology i.e. LANDMAP to

determine SLA coverage in the area but supplemented this with additional local criteria. This is considered acceptable as it is in accordance with CCW Guidance Note 1.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that a new Paragraph is inserted under paragraph 8.73 as follows:

Brecon Beacons National Park do not identify any Special Landscape Areas. Blaenau Gwent's SLA boundaries match Caerphilly's SLAs and VILLs but do not reflect those identified in Torfaen as they used a different approach by relying entirely on LANDMAP. Although Blaenau Gwent used LANDMAP it supplemented this with additional local criteria.

Reason for Recommendation

The proposed changes are not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: ENV3 Sites of Importance for Nature Conservation

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.290	Countryside Council for Wales (CCW)	Sound (C2, CE1)	Supports Policy ENV3.
10D.291	Countryside Council for Wales (CCW)	Unsound (C2)	SSSIs and LNRs should be shown on Proposals Map not Constraints Map. PPW and LDP Wales both specify the need for local and national heritage designations to be clearly identified on the LDP's Proposals Map.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Supports Policy ENV3 (CCW)
- SSSIs and LNRs should be identified on the Proposals Map (CCW)

Desired Changes to LDP

- No change required (CCW)
- SSSIs and LNRs should be shown on Proposals Map not Constraints Map (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
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COUNCIL RESPONSE

Council Analysis

- **Supports Policy ENV3 (CCW)**
Support welcomed.
- **SSSIs and LNRs should be identified on the Proposals Map (CCW)**
According to national planning policy (PPW Edition 4, 2011 and Paragraph 2.24 of LDP Wales (2005)) local and national heritage designations should be clearly identified on the LDP's Proposals Map.

The approach taken by the Council is that the Proposals Map sets out local designations identified by the Council. Designations identified by separate legislation are identified on the Constraints Map. The advantage of this is that they can be updated when necessary and it does not give a false impression that the designations can be changed through the LDP process.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: ENV3.2 Bryn Serth (SINC)
Alternative Site Ref: AS (A)04**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
19D.18	DPP acting for Newbridge Construction Limited (DPP)		The boundary of the designated SINC at Bryn Serth (ref ENV3.2) should be redrawn to exclude the land allocated as MU1 where there is extant planning permission for mixed use development as the duplication may be a barrier to development.

Representation – Alternative Site AS (A) 04 – Amend the boundary of the SINC

No	Name	Support /Object	Comment
10AS.756	Countryside Council for Wales (CCW)	Object	CCW would welcome the opportunity of further discussion in relation to this allocation.
18AS.813	Environment Agency (EA)	Object	It is not clear what the rationale is for amendment to boundary of the SINC. Site was designated for a particular reason using nationally agreed criteria and has an important role to play in biodiversity. Policies within LDP should provide protection.
208AS.670	Mrs Y Walker	Object	Disagrees with the boundary changes to permit housing, since the site is more vulnerable to preserve for the future, rather than for the profit of developers concerned.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Redraw boundary of SINC (ENV3.2) to exclude it from MU1 as it could ultimately be an unnecessary barrier to its development (DPP)

Desired Changes to LDP

- Delete the area of SINC (ENV3.2) which falls within MU1 (DPP)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified.

SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Would welcome meeting to discuss allocation (CCW)
- No clear rationale for amendment to SINC (EA)
- Object to change in boundary (Mrs Y Walker)

Desired Changes to LDP

- Retain the site in the Plan (CCW) (EA) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

The key issues are identified as follows:

- **Redraw boundary of SINC (ENV3.2) to exclude it from MU1 as it could ultimately be an unnecessary barrier to its development (DPP)**
Disagree. All Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely; 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. SINCS are approved by a Panel of experts which includes the Countryside Council for Wales, Gwent

Wildlife Trust, SEWBReC, the Blaenau Gwent Biodiversity Partnership, the Council's ecologist and other bodies. Further information on SINCS is available in the Environment Background Paper.

The representor has requested the boundary of the SINC to be amended as it covers an area of land where there is extant planning permission for mixed use but has not provided an ecological report to justify the proposed amendment. As the designation of SINCS was carried out on a scientific basis with supporting evidence there is no justification in amending the boundary.

It is acknowledged that an allocated site (MU1) falls within a SINC designation (ENV3.2) but whilst it is important to protect the biodiversity of SINCS from inappropriate development, it should be noted that in accordance with national planning policy, designation of SINCS will not preclude socio-economic activities. However, any development proposal will be informed by an ecological assessment to ensure protection and enhancement of biodiversity.

Therefore it is considered that the site should remain designated as a SINC, without any modification of its boundary.

- **Would welcome meeting to discuss allocation (CCW)**

A meeting was held with CCW on 27th October 2011 where the allocation was discussed.

- **Objection to amendment of SINC (EA) (Mrs Y Walker)**

Objections noted.

Conclusion

The Council considers that the site should remain in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: ENV3.104 Land to the east of Pant View
Alternative Site Ref: AS (D) 10**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
40D.173	Mr B Morgan	Unsound (CE2)	Objects to the SINC designation at the Land East of Pant View and the findings of the survey carried out to designate the site as a SINC.

Representation – Alternative Site - AS (D) 10 - Delete SINC designation

No	Name	Support /Object	Comment
10AS.775	Countryside Council for Wales (CCW)	Object	Residential development at this location would erode the edge of the recently identified SLA and would lead to a loss of SINC habitats and would be contrary to LDP Objectives and Policies.
208AS.702	Mrs Y Walker	Object	Object to allocating this site for housing.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Objects to the SINC designation (Mr B Morgan)

Desired Changes to LDP

- Delete the SINC designation (Mr B Morgan)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base
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Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Object to the deletion of the site from the Plan for the following reasons:
 - Erode edge of SLA (CCW)
 - Loss of SINC habitats (CCW)
 - Be contrary to LDP objectives and policies (CCW)
 - Disagree with housing (Mrs Y Walker)

Desired Changes to LDP

- Retain the SINC in the Plan (CCW) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **Objects to the SINC designation** (Mr B Morgan)

All Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely; 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. SINCS are approved by a Panel of experts which includes the Countryside Council for Wales, Gwent Wildlife Trust, SEWBReC, the Blaenau Gwent Biodiversity Partnership, the Council's ecologist and other bodies. Further information on SINCS is available in the Environment Background Paper. A copy of the authority's individual SINC site maps, corresponding site description and analysis are also available. The issue of allocating the site for housing in the Plan is dealt with under the report AS (N) 16.

It should be noted that an ecological report has not been provided to substantiate the respondent's disagreement with the SINC survey and it is considered that the site should remain designated as a SINC.

- **Objection to the deletion of the site** (CCW) (Mrs Y Walker)
All objections received during the alternative site consultation are noted.

Conclusion

The Council considers that the site should remain in the LDP

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of

soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: ENV3.132 Greenmeadow Farm (SINC)
Alternative Site Ref: AS (A) 17

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
80D.313	Ian Roberts Consultancy on behalf of Mr Idris Watkins (Mr I Roberts)	Unsound (P1,C1,C2,C4, CE1,CE2,CE4)	The representation seeks to amend the SINC boundary of ENV3.132 to exclude Land at Ty Pwdr Farm.

Representation – Alternative Site AS (A) 17 – Amend the boundary of the SINC

No	Name	Support /Object	Comment
10AS.761	Countryside Council for Wales (CCW)	Object	This SINC features rich habitats that support a number of species and provides connectivity to a wider area. The existing boundary is consistent with the aim of the plan through policies. An appeal decision was dismissed in 2010.
18AS.818	Environment Agency (EA)	Object	It is not clear what the rationale is for the SINC boundary amendment. Site was designated for a particular reason using nationally agreed criteria and has an important role to play in biodiversity. Policies within LDP should provide protection.
80AS.1033	Ian Roberts Consultancy on behalf of Mr Idris Watkins (Mr I Roberts)	Support	The representation seeks to amend the SINC boundary of ENV3.132 due to incorrect assessment.
208AS.699	Mrs Y Walker	Object	Development will cause extra environmental burdens on the existing infrastructure, this application doesn't carry the same value as the SINC.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- The boundary of the SINC should be amended in the Plan (Mr I Roberts)

Desired Changes to LDP

- Amend the boundary of the SINC in the Plan (Mr I Roberts)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Object to the amendment of the SINC for the following reasons:
 - This SINC features rich habitats that support a number of species and provides connectivity to a wider area (CCW)
 - Site was designated for a particular reason using nationally agreed criteria and have an important role to play in biodiversity (EA)
 - Development will cause extra environmental burdens on the existing infrastructure this application doesn't carry the same value as the SINC (Mrs Y Walker)
- Support amendment as SINC incorrectly assessed (Mr I Roberts)

Desired Changes to LDP

- No change to the SINC (CCW) (EA) (Mrs Y Walker)
- Amend the SINC boundary (Mr I Roberts)

COUNCIL RESPONSE

Council Analysis

- **The boundary of the SINC should be amended in the Plan** (Mr I Roberts)

It is proposed that the boundary of the SINC is amended to facilitate residential development. The issue of allocating the site for housing in the Plan is dealt with under the report AS (N) 21.

Disagree. All Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely; 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. SINCS are approved by a Panel of experts, which includes the Countryside Council for Wales, Gwent Wildlife Trust, SEWBReC, the Blaenau Gwent Biodiversity Partnership, the Council's ecologist and other bodies.

- **Object to the amendment of the SINC** (CCW) (EA) (Mrs Y Walker)

All objections received during the alternative site consultation are noted.

- **Supports amendment, as SINC incorrectly assessed** (Mr I Roberts)

The representor has stated that the assessment of the SINC was not carried out properly and did not appreciate alternative designations within the site i.e. that the site was allocated for housing in the UDP. The criteria for designating SINCS is clearly explained in the document 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff' It does not include taking into account other land use allocations such as for housing.

Conclusion

The Council considers that the site should remain designated as a SINC in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: ENV4 Land Reclamation Schemes

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.292	Countryside Council for Wales (CCW)	Sound (CE2)	Welcomes and supports that ecological surveys will be required prior to any reclamation works.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- Support for ecological surveys (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

COUNCIL RESPONSE

Council Analysis

- **Support for ecological surveys (CCW)**
Support welcomed.

**Policy: ENV4.2 Parc Bryn Bach (Land Reclamation)
Alternative Site Ref: AS (D) 07**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
23D.28	Tredegar Town Council (TTC)	Unsound	Land reclamation designation at Parc Bryn Bach will result in a detrimental effect on a key site and also there is a lack of consideration to environmental affect of marshy area.
85D.15	Mrs H Milne		Objects to Land Reclamation proposal at Parc Bryn Bach as loss of water feature.

Representation – Alternative Site AS (D) 07 – Delete Allocation

No	Name	Support /Object	Comment
208AS.701	Mrs Y Walker	Support	Support the deletion of the site for land reclamation, it is important for tourism and leisure which should stimulate the economy.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- The site should be deleted from the Plan for the following reasons:
 - Detrimental effect on a key site (TTC)
 - Lack of consideration to environmental effect of marshy area (TTC)
 - Requests deletion of site due to loss of water feature (Mrs H Milne)

Desired Changes to LDP

- Delete the site for land reclamation from the Plan (TTC) (Mrs H Milne)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness

None identified

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the deletion of the site from the Plan for the following reasons:
 - It is important for tourism and leisure which should stimulate the economy (Mrs Y Walker)

Desired Changes to LDP

- Delete the site from the Plan (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan (TTC) (Mrs H Milne)**
The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site No. A39).

The site was allocated for land reclamation in order to reclaim part of the lake and create a wetland.

The following concerns were raised:

- **Detrimental effect on key site (TTC)**

No evidence of the 'detrimental effect' has been provided. Therefore it is difficult to respond specifically. However, in general terms it is considered that the creation of a wetland will add to the biodiversity value of the site by creating additional habitats.

- **Lack of consideration to environmental effect of marshy area (TTC)**

The proposal is to convert an area of open water into a wetland, which would result in biodiversity gain through the creation of additional habitats.

- **Requests deletion of site due to loss of water feature (Mrs H Milne)**

Mrs H Milne is concerned that draining part of the lake will have a detrimental impact on the overall site or diminish the enjoyment of visitors. As stated in the Environment Background Paper it is proposed to create a wetland. This will enhance the biodiversity of the area and complement the existing mosaic of habitats and increase overall enjoyment for visitors to Parc Bryn Bach.

- **Support the deletion of the site from the Plan (Mrs Y Walker)**

The representor states that the site should not be allocated for land reclamation, as it is important for tourism and leisure, which should stimulate the already depressed economy. Parc Bryn Bach is recognised as a key tourism site in Blaenau Gwent. The purpose of the designation is to enable a wetland to be created, which will enhance the biodiversity of the area and

complement the existing mosaic of habitats and increase overall enjoyment for visitors to Parc Bryn Bach.

Conclusion

The Council considers that the site is suitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: ENV4.4 Llanhilleth Pithead Baths
Alternative Site Ref: AS (D) 16**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
1D.1	Mr P Davidson	Unsound (CE2,CE3)	Object to land reclamation until residents have been fully informed of what the Council proposes to do with the land once they have reclaimed it.
13D.29	Ms G Joseph	Unsound (CE2,CE3)	Object to land reclamation until residents have been fully informed of what the Council proposes to do with the land once they have reclaimed it.

Representation – Alternative Site AS (D) 16

No	Name	Support /Object	Comment
161AS.956	Llanhilleth Tenants and Residents Association (LTRA)	Support	Existing development should be demolished and the site used for a community facility which would improve the area and provide a location for the Llanhilleth Colliery Memorial.
208AS.708	Mrs Y Walker	Support	Agree with proposals to delete this site for reclamation. The public have not been informed what the Council's exact plans are and the site should be left as open space.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation (s) are as follows:

- The site should be deleted from the Plan for the following reasons (Mr P Davidson) (Ms G Joseph):
 - Proposed after use unknown

Desired Changes to LDP

- Delete the site for land reclamation from the Plan (Mr P Davidson) (Ms G Joseph)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

Support the deletion of the site from the Plan for the following reasons:

- Supports demolition of building but after use should be community facility (LTRA)
- After use should be open space (Mrs Y Walker)

Desired Changes to LDP

- After use should be for a community facility (LTRA)
- Delete the site from the Plan (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan** (Mr P Davidson) (Ms G Joseph) (Mrs Y Walker) (LTRA):

The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site No. D18).

The site was allocated for land reclamation in order to enable the removal of the derelict building which is considered as an eyesore and to enable the land to be developed for housing.

The following issues were raised:

- **Proposed use unknown** (Mr P Davidson) (Ms G Joseph)

The main concern raised by both representors relates to the proposed after use of the site. The site is currently occupied by the Llanhilleth Pithead Baths and will become vacant once the buildings are demolished.

The proposed after use of the site is residential development and in fact outline planning permission has previously been granted at this site (ref. 2006/0032) and a planning application was approved for demolition for residential development and realignment of the highway (ref. 2007/0578).

The proposed after-use was identified in the Environment Background Paper in Table 2 and an e-mail was sent to Mrs Joseph on 31st May 2011 explaining that *'The intention is to demolish the buildings on the site and carry out any remediation works necessary to permit the proposed after-use of the land. The site could offer an opportunity for Environmental Enhancement, Highway Improvement opportunity to realign severe bend, car park provision and limited housing development. As any potential development will be less than 10 units this site has not been identified for housing in the Deposit Local Development Plan'*.

The issue is with the after use of the site rather than the land reclamation scheme. As concerns on after use of the site have been raised rather than the actual allocation of the site for land reclamation being directly objected to then it is considered an acceptable allocation.

- **Support for demolition but after use should be a community facility (LTRA)**

The representation made by LTRA supports the demolition of the buildings but has suggested that a community facility be located on the site. No supporting evidence has been submitted such as a business plan for such a facility. When sites are allocated for land reclamation there must be a known after use and as planning permission has been previously granted at this site for residential development and demolition of buildings etc. then there is likelihood that such a development will take place.

It is considered that the land reclamation allocation should not be removed from the Plan in order to enable removal of the buildings.

- **Support for demolition but after use should be open space (Mrs Y Walker)**

Mrs Walker has stated that the site should be deleted as a land reclamation allocation until its future use is known. Having said that her preferred after use is open space. She fails to understand that the buildings would need to be reclaimed for the site to be used for open space.

Conclusion

The Council considers that the site should be allocated for Land Reclamation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of

soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Policy: ENV5.2 Dukestown Cemetery
Alternative Site Ref: AS (D) 08**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
73D.133	Mr Skinner et al	Unsound (CE2)	Objects to the allocation of the site. The site should be retained for its current use as agriculture / farmland where cattle and sheep are grazing.

Representation – Alternative Site AS (D) 08 – Delete Allocation

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be deleted from the Plan and retained for its current use as agriculture / farmland (Mr Skinner et al)

Desired Changes to LDP

- Delete the site from the Plan (Mr Skinner et al)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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COUNCIL RESPONSE

Council Analysis

- **The site should be deleted from the Plan and retained for its current use as agriculture / farmland** (Mr Skinner et al)

The key policy document that relates to this issue is Planning Policy Wales, which requires local planning authorities to make adequate provision for community facilities, of which a cemetery is one such facility. In order to address demand in the County Borough it is necessary to allocate further

cemetery provision.

The Council has undertaken a review of the current cemeteries capacity within Blaenau Gwent. Dukestown Cemetery has approximately 5 to 6 years burial capacity left at the cemetery based on existing burials. Also the proposed Heads of the Valleys dualling could result in the Council having to exhumate a number of graves for re-burial which would reduce future burial capacity. Therefore a future extension option is required to ensure there is continuity of burial service in Dukestown. The land is a logical extension to the existing cemetery.

Planning Policy Wales states that the best agricultural land (grades 1, 2 and 3a) should be preserved. The site in question consists of low grade agricultural land (grade 5). Therefore, there is no requirement under national policy for it to be retained in its current use.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: M1 Safeguarding of Minerals

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.143	Welsh Government (WG)	Unsound (C2, CE1, CE2)	No sand and gravel resource has been identified and 'sand and gravel' is not specified in Policy M1.
3D.1053	Welsh Government (WG)		The plan's written statement should clarify the relationship between this plan area and its neighbours. It would be useful for the plan to clarify its relationship with the existing and emerging LDP of neighbouring plan area with regard to the mapping of Mineral Safeguarding Areas
10D.293	Countryside Council for Wales (CCW)	Sound (C2)	Welcomes the recognition in paragraph 8.79 that the identification of safeguarding areas does not carry any presumption that planning permission will be granted for their extraction, and consider that it meets Test of Soundness C2.
45D.56	Confederation of UK Coal (UK Coal)	Unsound (C2)	The tertiary coal resource should be safeguarded. The Coal Authority resource maps should be used to determine the resources to be safeguarded. Coal resources in designated areas should also be safeguarded.
46D.197	Brecon Beacons National Park (BBNP)	Unsound (C1, C2)	Issue with Aggregate Safeguarding areas and the need for consistency between Blaenau Gwent and BBNP.
62D.190	Caerphilly County Borough Council (CCBC)	Sound	It is noted that a 500m buffer had been identified on the Proposals Map around coal resource in Blaenau Gwent. This approach is not consistent with Caerphilly approach but recognise that this

			is on advice from WG and therefore do not wish to object
64D.378	National Grid (NG)	Comment	One of National Grid's high pressure underground gas transmission pipelines crosses through an area identified in the Deposit Proposals Map for Coal Safeguarding. Developers should be made aware of this issue.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Identification of sand and gravel resources (WG)
- Clarification of mapping of safeguarding areas with neighbouring authorities (WG)
- Support for statement that safeguarding does not carry presumption that planning permission will be granted (CCW)
- Identify tertiary coal resource (UK Coal)
- Issue with the identification of Coal Resource (UK Coal) (CCBC)
- Need for consistency of safeguarding areas (BBNP)
- Presence of high pressure underground gas transmission (NG)

Desired Changes to LDP

- The plan's Written Statement supported by evidence, should state if it is considered that there are no relevant sand and gravel resources to safeguard (WG)
- Include a paragraph clarifying mapping of safeguarding areas with neighbouring authorities (WG)
- Welcome further liaison work to ensure a cohesive strategy is achieved. Failing this, we recommend that a clear position statement is drafted (BBNP)
- Identify tertiary coal resource (UK Coal)
- Change not clearly stated (UK Coal)
- Change not clearly stated (CCBC)
- Change not clearly stated (NG)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and

	allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

COUNCIL RESPONSE

Council Analysis

- **Identification of sand and gravel resources (WG)**

Agree. The Plan needs to state that it is considered that there are no relevant sand and gravel resources to safeguard. The evidence for this is set out in the 'Former Gwent Aggregates Safeguarding Study' and is based on work undertaken for WG by Symonds Group Limited (Thomson et al., 2000 paras. 2.15-2.18).

Amend paragraph 8.79 by the inclusion of the following at the start of the paragraph:

In accordance with national planning policy the LDP identifies safeguarding areas. The areas identified are based on the 'Former Gwent Aggregates Safeguarding Study', this ruled out weaker sandstones and sand and gravel reserves. The identification of safeguarding areas for the above minerals does not carry any presumption that planning permission would be granted for their extraction. The purpose of safeguarding is to ensure that known resources are not needlessly sterilised by permanent development (Policy DM20).

- **Clarification of mapping of safeguarding areas with neighbouring authorities (WG)**

Agree. The plan needs to clarify how it's mapping of the safeguarding areas meets with neighbouring authorities.

Amend paragraph 8.79 by the inclusion of the following sentence:

The areas mapped accord with those identified by the neighbouring authorities of Caerphilly and Torfaen (though Torfaen added a 200m buffer to the resource areas) but differs to Brecon Beacons National Park which safeguards different resources.

- **Support for statement that safeguarding does not carry presumption that planning permission will be granted (CCW)**

Support welcomed.

- **Identify tertiary coal resource (UK Coal)**

Disagree. MTAN 2 paragraph 35 requires only that the primary and secondary resource be safeguarded. Paragraph 35 of the MTAN explains that this approach is considered as meeting the requirement for safeguarding as set out in MPPW. Notwithstanding this, it should be noted that the tertiary resource is overlain by Pennant Sandstone and is therefore safeguarded by the Plan through policy M1.2.

- **Identification of Coal Resource (UK Coal) (CCBC)**

Disagree. The Coal Resource safeguarding area is based on information provided by BGS as advised in paragraph 24 and 25. The information provided by the Coal Authority relates to the whole resource area – not the primary and secondary resource. The Coal Authority request that coal resources in designated areas should also be safeguarded. The Council can confirm that this is the case as the safeguarding area includes designated areas.

Blaenau Gwent has not added 500m to the boundary as is suggested by Caerphilly. The discrepancy with Caerphilly is due to Blaenau Gwent including areas which Caerphilly omitted.

- **Need for consistency in the safeguarding of aggregates (BBNP)**

Agree. When preparing the safeguarding areas there was no clear guidance on the exact approach to be adopted. Blaenau Gwent's worked with other former Gwent areas to commission Cuesta Consulting to identify aggregate safeguarding areas. The aggregates protected are Pennant Sandstone and Carboniferous Limestone (details of the strata can be found in the Former Gwent Aggregate Safeguarding Study p.9). There appears to be a discrepancy between what Brecon Beacons National Park are going to identify and what Blaenau Gwent have identified. The reason for this is firstly due to the fact that Blaenau Gwent is protecting a wider resource and secondly because Blaenau Gwent has missed a small area of Limestone from the safeguarding area.

It is proposed that the missing limestone resource is added to the safeguarding area.

- **Presence of high pressure underground gas transmission (NG)**

Noted. Safeguarding does not carry a presumption that planning permission will be granted. The underground gas transmission line is identified on the constraints map and would be considered during the planning application process if an application were to be submitted.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that Paragraph 8.79 be amended as follows:

In accordance with national planning policy the LDP identifies safeguarding areas. The areas identified are based on the 'Former Gwent Aggregates

Safeguarding Study, this ruled out weaker sandstones and sand and gravel reserves. The areas mapped accord with those identified by the neighbouring authorities of Caerphilly and Torfaen (though Torfaen added a 200m buffer to the resource areas) but differs to Brecon Beacons National Park which safeguards different resources. The identification of safeguarding areas for the above minerals does not carry any presumption that planning permission would be granted for their extraction. The purpose of safeguarding is to ensure that known resources are not needlessly sterilised by permanent development (Policy DM20).

That the Council recommend to the Planning Inspector that the proposals map be amended by an addition to the limestone safeguarding area at the northern tip of the Plan area.

The amendment is shown on Map 7 attached at Appendix 3.

Reason for Recommendation

The proposed changes are not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Policy: M2 Mineral Buffer Zones

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
3D.144	Welsh Government (WG)	Unsound (C2, CE1, CE2)	It is not clear from the plan or background paper whether there are any dormant/inactive mineral sites. To accord with MTAN1 buffer zones should be defined around all permitted and proposed/allocated mineral sites: this includes dormant/inactive.
10D.294	Countryside Council for Wales (CCW)	Sound (C2)	Supports the policy in principle and considers that it meets Test of Soundness C2

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Position on dormant/inactive sites (WG)
- Support for the principle of the policy (CCW)

Desired Changes to LDP

- Identify buffer zones around dormant/inactive sites, with clarification of the Council's approach to these sites including intentions in relation to making prohibition orders (WG)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

COUNCIL RESPONSE

Council Analysis

- **Position on dormant/inactive sites (WG)**

Agree. The dormant/inactive area covered by the IDO in Trefil needs to have a buffer around the site. It is suggested that the reasoned justification is amended to provide more certainty for residents of Trefil in terms of what development may be permitted and what the Councils plan of action is for the site. The Minerals Background Paper will be updated to reflect this change.

- **Support for the principle of the policy (CCW)**

Support welcomed.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the proposals map be amended to extend the buffer around the dormant part of Trefil Quarry.

The amendment is shown on Map 8 attached at Appendix 3.

That the Council recommend to the Planning Inspector that paragraph 8.82 is amended and an additional paragraph be added to explain the position with regards dormant /inactive sites.

Mineral Buffer zones are shown around all quarries and mineral operations, including dormant sites. The purpose of the buffer zone is to safeguard mineral reserves for future working, by ensuring they are not sterilised by alternative development, but also to ensure the environmental effects of quarrying/mining do not adversely affect sensitive development (including residential areas, hospitals and schools). However, development such as extensions to existing properties, small infill development within settlement boundaries would normally be permitted. Mineral Buffer Zones have been identified around the limestone quarry at Trefil, the open cast coal recovery operation at Six Bells and around Blaentillary Drift, which is located in Torfaen County Borough.

In the case of the buffer zone at Trefil the boundary is identified around the dormant part of the quarry in addition to the active part. Whilst dormant sites retain permission, full modern conditions would be applied to the extant

permission in accordance with national guidance prior to any working recommencing on site. National guidance also recognises the importance of determining the future use of dormant sites to give certainty to local communities that may be affected by future mineral operations. Having regard to this, the Council will consider an appropriate strategy for the future use and restoration of the site which may include a Prohibition Order.

Reason for Recommendation

To accord with MTAN1 with regard to identifying a buffer around dormant/inactive sites and to maintain the soundness of the Plan.

Policy: M3 Areas where Coal Working will not be acceptable:

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
10D.295	Countryside Council for Wales (CCW)	Unsound (C2)	Recommends that the LDP states that although outside a site designated for its national or international importance, development can still have a significant impact on such sites & any proposals will need to be considered for environmental impact.
45D.57	Confederation of UK Coal Producers (CoalPro)	Unsound (C2)	To state that coal working is not acceptable within 500m from settlement boundary and within international and national designations of importance is incorrect. MTAN2 provides for exceptional circumstances within buffer zones and may be acceptable.
62D.191	Caerphilly County Borough Council (CCBC)	Sound	Approach to areas where coal working is not allowed being identified on the proposals map is not consistent with Caerphilly CBC approach. However, do not wish to object as recognise that need for the designation has arisen since their LDP adopted.

Summary of Key Issues

The key issues identified in the representation(s) are as follows:

- Reference to impact on designated International and National Sites (CCW)
- Clarification of where Coal Working is acceptable (CoalPro)
- Approach not consistent with CCBC (CCBC)

Desired Changes to LDP

- Add text to LDP to explain that although outside a site designated for its national or international importance, development can still have a significant impact on such sites & any proposals will need to be considered for environmental impact (CCW)
- Change not clearly stated (Coal Pro)
- Change not clearly stated (CCBC)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C2	It has regard to national policy.
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COUNCIL RESPONSE

Council Analysis

- **Reference to impact on designated International and National Sites (CCW)**

Disagree. This policy identifies the areas where coal working is not acceptable. Policy DM19 will be used to guide where coal working may be acceptable and the impact on designated sites will be taken into consideration at this stage. An additional sentence within the reasoned justification of this policy will not improve the soundness of the Plan.

- **Clarification of where Coal Working is acceptable (CoalPro)**

Disagree. The Council has determined that coal working in the identified areas is unacceptable.

Approach not consistent with CCBC (CCBC)

It is agreed that Caerphilly have not identified areas where coal working will not be allowed but as Caerphilly acknowledge Blaenau Gwent has been encouraged to adopt this approach by WG in accordance with MTAN2 paragraph 29.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be

made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Policy: M4.1 Trefil Quarry
Alternative Site Ref: AS (A) 08, AS (D) 05
Alternative Site Name: Trefil Quarry

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.296	Countryside Council for Wales (CCW)	Unsound (C2, CE1)	Concerns over the impact of any development on natural heritage interests given the extent of biodiversity and geodiversity interest at proposed Preferred Area M4.1 and its proximity to the BBNP.
16D.67	Cllr J Morgan Tredegar Town Council (Cllr J Morgan)	Unsound	Objects to the identification of land adjacent to Trefil Quarry as a Preferred Area for mineral extraction on the following grounds: <ul style="list-style-type: none"> • area of outstanding beauty; • impact on wildlife; • impact on adjoining ancient monument.
23D.68	Tredegar Town Council (TTC)	Unsound (CE1, CE2, CE3)	Objects to land adjacent to Trefil Quarry as a Preferred Area on the grounds of: <ul style="list-style-type: none"> • insufficient consultation; • adverse impact on landscape; • establishment of need; • impact on ancient monument; • impact on community; • wildlife; and • highway problems.
26D.66	Harmers acting on behalf of Gryphon Quarries Ltd (Harmers)	Unsound (C1, C2, CE2)	Apportionment figure of 3mt is too low and will not allow the company to bring forward proposals for the quarry extension.

Representation – Alternative Site AS (A) 08 Trefil Quarry – Amend boundary to minimise natural heritage assets

No	Name	Support /Object	Comment
10AS.759	Countryside Council for Wales	Comment	Welcomes the opportunity of further discussion to consider

	(CCW)		the potential for revising the boundary of the allocation.
26D.1073	Harmers acting on behalf of Gryphon Quarries Ltd (Harmers)		Welcomes further discussion with CCW regarding their comments and wish to attend any meeting with the Council and CCW to discuss the boundary of the site. Not sure if CCW have seen the reports submitted by Harmers.
92AS.617	Gwent Wildlife Trust (GWT)	Support	Object to the development of this site which supports a mosaic of grassland wet and dry heath supporting a number of important species. We support the proposal to amend the boundary to protect natural heritage interests.
208AS.675	Mrs Y Walker	Object	Objects on grounds of: <ul style="list-style-type: none"> • Pollute aquifer or cause it to dry up; • Decimate tourism on account of visual pollution; • Impact on National Park area; and • Impact on biodiversity and RIG.

Representation – Alternative Site AS (D) 05 Trefil Quarry – Delete Allocation

No	Name	Support /Object	Comment
10AS.772	Countryside Council for Wales (CCW)		Welcome the opportunity to further discuss the potential to for revision of the boundary to minimise impact upon natural heritage interests within the area.
92AS.626	Gwent Wildlife Trust (GWT)	Support	Object to the development of this site which supports a mosaic of acid grassland wet and dry heath supporting a number of important species. We support this site being deleted from the LDP.
251AS.1062	Mr F Olding	Support	Supports the deletion of this site on grounds of the adverse impact on the Trefil Quarry (north) Scheduled Ancient

			Monument and its setting.
208AS.700	Mrs Y Walker	Support	Support deletion of this site as a preferred area for mineral extraction. Site is an SLA/SINC it promotes tourism and leisure, and boosts the economy - site should be protected.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation at the Deposit Plan stage are as follows:

- Concerns regarding extent of the Preferred Area and its impact on natural heritage on grounds of the extent of (CCW):
 - Biodiversity
 - Geodiversity
 - Proximity to National Park
- Request to delete the site on grounds of (Cllr J Morgan):
 - Impact on area of outstanding beauty
 - Impact on biodiversity
 - Impact on ancient monument
- General concerns regarding the allocation on grounds of (TTC):
 - Impact on landscape
 - Impact on community in terms of exacerbating existing problems
 - Lack of communication with the community
 - Establishment of need
 - Impact on Ancient Monument
 - Impact on use of land for tourism
- Issue with apportionment figure (Harmers)

Desired Changes to LDP

- Revise the boundary of the preferred area to minimise natural heritage interests. Further details of the biodiversity/geodiversity and proximity to the BBNP considerations should be incorporated into Chapter 9.0 (CCW)
- Delete site (Cllr J Morgan)
- The apportionment figure in paragraph 8.84 should be amended to read 6Mts and the last sentence should be amended to state that "Blaenau Gwent needs to identify at least a further 3.76Mts" (Harmers)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
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C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.

SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

Alternative Site AS (A) 08 Trefil Quarry

- Welcome meeting to discuss possible amendments to boundary (CCW) (Harmers)
- Support proposal to amend the boundary of the site (GWT)
- Objects to an amendment to the boundary of the site on the following grounds (Mrs Y Walker):
 - Impact on aquifer
 - Impact on tourism due to polluting effect of quarrying
 - Impact on National Park
 - Impact on biodiversity
 - Impact on RIG

Alternative Site AS(D) 05 Trefil Quarry

- Welcome meeting to discuss possible amendments to boundary (CCW)
- Support for the deletion of the site on the following grounds:
 - Impact on biodiversity (GWT) (Mrs Y Walker)
 - Adverse impact on Scheduled Ancient Monument and its setting (Mr F Olding)
 - Impact on landscape (Mrs Y Walker)
 - Impact on tourism/leisure and the economy (Mrs Y Walker)

Desired Changes to LDP

- Amend boundary of site (CCW) (GWT)

- Delete site (Mrs Y Walker) (Mr F Olding) (GWT)

COUNCIL RESPONSE

Council Analysis

There are a number of issues raised but these can be summarised into three categories, those which raise general issues with the need for and working of the Preferred Area, those which seek an amendment to the boundary and those who request the deletion of the Preferred Area. It should be noted that Preferred Areas are areas of known resources with some commercial potential, and where planning permission might reasonably be expected. It is not an allocation where planning permission is likely to be acceptable (MPPW para. 14). The Minerals Background Paper acknowledges that there are a number of issues which need to be addressed for an application to be considered acceptable.

General Issues with site:

- **Exacerbate existing problems for the community especially highways (TTC)**

Disagree. The existing issues with the working of the site will not increase as any proposal would be looking to extend the existing working of the quarry rather than increase output. The fact that the operations will be more distant from the community means that any existing issues with relation to noise should decrease. Notwithstanding this permission would only be granted at the site if a planning application could meet the policy requirements set out in DM19 and national guidance, regarding impact on neighbouring communities and highway considerations.

- **Lack of communication with the community (TTC)**

Disagree. Site notices were placed in Trefil during consultation on the Deposit Plan and Alternative Sites. In addition every household in the borough were sent a leaflet informing them of the consultation on the LDP. A formal notice was placed in the Gwent Gazette informing the public of consultation on the Plan and Alternative Sites. Exhibitions held at the deposit stage were well advertised in the Gwent Gazette. Nevertheless, it should be noted that more extensive consultation would be undertaken as part of the planning application process.

- **Establishment of need (TTC)**

Disagree. The need for further mineral working is set out in the Minerals Background paper and the Regional Technical Statement on Aggregates (SWRAWP 2008) and these identify that Blaenau Gwent needs to make a resource allocation of at least 3 million tonnes. It should be noted that Blaenau Gwent is only looking to permit a further 0.76 million tonnes to meet the RTS requirement or a further 6.37 years supply. The contribution which secondary/recycled material is expected to make has already been top sliced from the overall requirement figure. Notwithstanding this, Policy DM3 will require any future planning application to establish need and undertake an assessment to demonstrate that it would not be feasible to supply the mineral from secondary sources.

- **Issue with apportionment figure** (Harmers)

Disagree. This issue has already been discussed under policy SP12 and no change is required to the Plan as a result.

- **Amendment to boundary of Trefil Quarry**

- Impact on geodiversity (CCW)
- Impact on biodiversity (CCW, GWT)
- Proximity to National Park (CCW)

Agree. At a meeting held between CCW, BGCBC and Harmers on the 27th of October Harmers suggested an amendment to Preferred Area. These changes were to take account of geological formations to the east of the site, biodiversity interests, visual impact and the boundary with BBNP. Further to the meeting CCW have suggested that they now wish to object to the site. Due to the timing of this and the fact that no formal notification has been received it is suggested that this is dealt with through the Examination process. It is suggested that the amendment to the boundary is a more appropriate boundary and should be considered through the Focussed Change consultation process.

It is agreed to amend the boundary as identified on Map 9 and 10 in appendix 3.

- **Deletion of Trefil Quarry**

- **Impact on area of outstanding beauty** (Cllr J Morgan)

In determining any future planning application the adverse impacts on sensitive landscapes will be required to be minimised. Whilst the area is not identified as an area of outstanding natural beauty (AONB) the qualities of the landscape will be taken into account.

- **Impact on biodiversity** (Cllr J Morgan) (GWT)

In determining any future planning application, measures will be required to ensure that ecological and wildlife interests do not suffer significant adverse effects, particularly where designated and proposed areas of nature conservation interests or protected species may be affected. If there are adverse effects on European Protected Species a project level Habitat Regulation Assessment will be required. If the proposal would adversely affect the integrity of the site (taking into account advice from the Countryside Council for Wales) and conditions would not remove this effect, planning permission will not be granted unless there are:

- No alternative solutions (i.e. alternative supplies cannot be made available at reasonable cost; and there is no scope for meeting the need in some other way); and,
- Imperative reasons of overriding public interest – including those of a social and economic nature. In determining this, authorities should have regard to considerations such as the need for the development in terms of UK mineral supply; and, the impact of permitting the development or refusing it on the local economy. The Assembly would consider the question of whether there are imperative reasons of overriding public interest for the development, taking account of advice from the Countryside Council for Wales, and bearing in mind the views of any other competent authority.

- **Adverse impact on Scheduled Ancient Monument and its setting** (Mr F Olding) (Cllr J Morgan)

In determining any planning application consideration will be given to any adverse impact on important features of the built environment and archaeologically sensitive areas, including scheduled ancient monuments.

- **Impact on landscape** (Mrs Y Walker)

In determining any future planning application the adverse impacts on sensitive landscapes will be required to be minimised.

- **Impact on tourism/leisure and the economy** (Mrs Y Walker) (TTC)

In determining any future planning application consideration will be given to the benefits to the local economy. No evidence has been provided on how this area boosts the economy.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Preferred Area is amended on the proposals map.

The amendments to the Preferred Area is shown on Map 9 attached at Appendix 3.

That the Council recommend to the Planning Inspector that the buffer zone around the Preferred Area on the proposals map is amended accordingly.

The amendments to the employment allocation is shown on Map 10 attached at Appendix 3.

Reason for Recommendation

The proposed change is not substantive but would protect environmental interests. Importantly the change would not affect the soundness of the plan.

Policy: M4.2 Tir Pentwys Tip Preferred Area
Alternative Site Ref: AS (D) 15, AS(A)16
Alternative Site Name: Tirpentwys Tip Preferred Area

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
2D.3	Mr G Holloway	Unsound (CE2)	Delete Tir Pentwys Preferred Area and buffer on the grounds that: <ul style="list-style-type: none"> • adverse impact on the environment, biodiversity, landscape; • greenfield site that should be retained; • buffer zone would inhibit proposed development for tourism; and • mineral not viable.
2D.323	Mr G Holloway	Unsound (CE2)	Delete the allocation of land at Tir Pentwys Tip as a preferred area and allocate as an amenity or tourism and leisure site because of: <ul style="list-style-type: none"> • the adverse effects on the environment, • biodiversity issues; and • greenfield site.
5D.58	Mrs B Williams	Unsound (C1, C4, CE2)	Object to the identification of Tir Pentwys as a Preferred Area for minerals on the grounds that: <ul style="list-style-type: none"> • detrimental to nearby livestock in terms of dust and noise; • inadequate road network; and • environmental grounds (SINC and SLA).
6D.59	Mrs N Kerr	Unsound (C1, C4, CE2)	Objects to the designation of Tir Pentwys as a Preferred Area on the grounds of: <ul style="list-style-type: none"> • impact of dust and noise on health; • impact of traffic; • spoil enjoyment of tranquil area ;and

			<ul style="list-style-type: none"> • destruction of landscape and biodiversity (SINC SLA)
7D.60	Mrs O Clatworthy	Unsound (C1, C4, CE2)	<p>Objects to the designation of Tir Pentwys as a Preferred Area on the following grounds:</p> <ul style="list-style-type: none"> • impact on spring water • disturbance to livestock • impact on wildlife • impact of noise and dust • loss of recreation resource • impact on tourism • landscape
8D.61	Mr & Mrs H Clatworthy	Unsound (C1, C4, CE2)	<p>Objects to Tir Pentwys Preferred Area on the grounds of:</p> <ul style="list-style-type: none"> • the way the site was chosen; • problems with Torfaen application; • biodiversity; • transport; • noise and light pollution; • health; • landscape; • leisure and recreation; • heritage; and • geology.
10D.297	Countryside Council for Wales (CCW)		<p>There are a number of issues with the access to the site within Torfaen, which is likely to result in the loss of an area of ancient woodland. Additional detail outlining the constraints of the site more fully is provided in the LDP.</p>
11D.62	Torfaen County Borough Council (TCBC)		<p>Torfaen support the designation of this site but request that the site is allocated to meet part of Torfaen's requirement for 8 million tonnes of aggregate under SWRAWP Regional Technical Statement.</p>
30D.64	Mr G Francombe		<p>Objects to the inclusion of Tir Pentwys as a Preferred area on the grounds of:</p> <ul style="list-style-type: none"> • impact of traffic; • impact of dust; and • exploitation of the area.
31D.63	Ms J Lewis		<p>Objects to the identification of Tir Pentwys as a Preferred Area for Minerals on the grounds that:</p>

			<ul style="list-style-type: none"> the area is a place of great beauty; and impact on horse riding route.
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Representation – Alternative Site: AS (A) 16 Delete Preferred Area and allocate for amenity or tourism and leisure

No	Name	Support /Object	Comment
92AS.622	Gwent Wildlife Trust (GWT)	Support	Object to the development of this site which is designated as a SINC. It supports bat roosts and is important for breeding birds and dragonflies. We support the proposal to use this site as a conservation/amenity area.
208AS.698	Mrs Y Walker	Support	Object to SP12 and this allocation because: <ul style="list-style-type: none"> Site designated as an SLA; Has high biodiversity value including ancient woodlands and RSPB listed species; Site is well used for leisure activities; Access road unsuitable; and Environmental issues.

Representation – Alternative Site: AS (D) 15 - Delete Tirpentwys Tip Preferred Area

No	Name	Support /Object	Comment
92AS.641	Gwent Wildlife Trust (GWT)	Support	Object to the development of this site which is designated as a SINC. It supports bat roosts and is important for breeding birds and dragonflies. We support the proposal to use this site as a conservation/amenity area.
208AS.707	Mrs Y Walker	Support	Agree with representations to delete this site. No jobs would be created, the local tourism economy would be decimated. Area will be visually decimated due to workings with a risk of contamination.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- Deletion of the site on grounds of:
 - Adverse impact on biodiversity (Mr G Holloway) (Mrs B Williams) (Mrs N Kerr) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy)
 - Impact on Landscape / Special Landscape Area (Mr G Holloway) (Mrs B Williams) (Mrs N Kerr) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy) (Ms J Lewis)
 - Buffer zone would prohibit development of tourism proposal on adjacent land (Mr G Holloway)
 - Detrimental to livestock in terms of dust and noise (Mrs B Williams) (Mrs O Clatworthy)
 - Impact on tourism (Mrs O Clatworthy)
 - Inadequate road network (Mrs B Williams)
 - Impact of dust and noise and light (Mrs B Williams) (Mrs N Kerr) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy) (Mr G Francombe)
 - Impact on health (Mrs N Kerr) (Mr & Mrs H Clatworthy)
 - Impact of traffic (Mrs N Kerr) (Mr & Mrs H Clatworthy) (Mr G Francombe)
 - Impact on ground waters (Mrs O Clatworthy)
 - Loss of recreation resource (Mr G Holloway) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy)
 - The way the site was chosen (Mr & Mrs H Clatworthy)
 - Problems with Torfaen application (Mr & Mrs H Clatworthy)
 - Impact on heritage (Mr & Mrs H Clatworthy)
 - Mineral not viable (Mr G Holloway)
 - Impact on geology (Mr & Mrs H Clatworthy)
 - Exploitation of the area (Mr G Francombe)
 - Impact on horse riding route (Ms J Lewis)
- The site should be allocated for amenity, tourism or leisure use (Mr G Holloway)
- Issues with the access of the site should be covered in the reasoned justification (CCW)
- The site should be allocated and should contribute towards Torfaen's 8 million tonnes SWRAWP requirement (TCBC)

Desired Changes to LDP

- Delete the Preferred Area and Buffer Zone (Mr G Holloway, Mrs B Williams, Mrs N Kerr, Mr & Mrs H Clatworthy, Mr G Francombe)
- Delete the allocation of land at Tir Pentwys Tip as a preferred area and allocate as an amenity or tourism and leisure site (Mr G Holloway)
- Add more detail outlining the constraints of Tir Pentwys Tip in the LDP (CCW)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support the amendment of the site to delete the Preferred Area and allocate it as amenity or tourism and leisure on grounds of:
 - Biodiversity (GWT) (Mrs Y Walker)
 - Loss of Ancient Woodlands (Mrs Y Walker)
 - Site well used by horse riders, walkers, cyclists (Mrs Y Walker)
- Support the deletion of the site on grounds of:
 - Biodiversity (GWT) (Mrs Y Walker)
 - Impact on tourism economy (Mrs Y Walker)
 - Noise (Mrs Y Walker)
 - Air pollution (Mrs Y Walker)
 - Impact on aquifer (Mrs Y Walker)
 - Permission through the back door (Mrs Y Walker)

Desired Changes to LDP

- Delete allocation and allocate it as amenity or tourism and leisure (GWT) (Mrs Y Walker)
- Delete the allocation (GWT) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

The concerns raised are to be addressed under three main headings, issues regarding the allocation, issues regarding the deletion of the site and issues regarding the allocation of the site for amenity or tourism and leisure use.

MTAN 1 requires development plans to make clear where mineral extraction should, or is most likely to, take place. The Plan identifies Preferred Areas which are areas of known resources with some commercial potential, and where planning permission might reasonably be anticipated.

Issues regarding the allocation of M4.2

- **Issues with the access of the site should be covered in the reasoned justification (CCW)**

Disagree. CCW request that the issues regarding the access of the site which involve the loss of an area of ancient woodland should be covered in the reasoned justification. The reasoned justification makes it clear that the development of this site is dependent on Torfaen granting planning permission although it is accepted that this is one outstanding issue to be addressed there may be other issues which may lead to a refusal by Torfaen County Borough Council. It is therefore suggested that no additional information should be included.

- **The site should be allocated and should contribute towards Torfaen's 8 million tonnes SWRAWP requirement (TCBC)**

Disagree. Blaenau Gwent has not been provided with sufficient evidence to support the allocation of this site. Without information on the size of the resource, when it is likely to come forward, or information to address other concerns raised by statutory undertakers, it is not possible to allocate the site or commit the resource. Therefore, no change is required to the Plan.

- **Issues regarding the deletion of Tir Pentwys Tip as a Preferred Area from the Plan**

It should be noted that Preferred Areas are areas of known resources with some commercial potential, and where planning permission might reasonably be expected. It is not an allocation, where planning permission is likely to be acceptable (MPPW para.14). The Minerals Background Paper acknowledges that there are a number of issues which need to be addressed for an application to be considered acceptable.

- **Adverse impact on biodiversity** (Mr G Holloway) (Mrs B Williams) (Mrs N Kerr) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy) (GWT) (Mrs Y Walker)

It is acknowledged that the site is identified as a Site of Importance for Nature Conservation (SINC) and that CCW has identified that there is a record of protected species on the site. However, such consideration will be considered in determining any future planning application. Policy DM19 states that measures will be required to ensure that ecological and wildlife interests do not suffer significant adverse effects, particularly where designated and proposed areas of nature conservation interests or protected species may be affected. A full ecological survey would be required as part of any future

planning application and CCW will advise the Council in respect of ecological interests.

- **Impact on Landscape / Special Landscape Area** (Mr G Holloway) (Mrs B Williams) (Mrs N Kerr) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy) (Ms J Lewis)

In determining any future planning application the adverse impacts on sensitive landscapes will be required to be minimised. Proposals for restoration will be required to favour landscapes which are characteristic of the area and cater for priority habitats identified in the Local Biodiversity Action Plan.

- **Buffer zone would prohibit development of tourism proposal on adjacent land** (Mr G Holloway)

Agree. The buffer zone would prohibit such a proposal. However, this would be lifted once the operation was completed. Refer to the Council's response on AS (N) 22 for further information regarding the tourism proposal.

- **Detrimental to livestock in terms of dust and noise** (Mrs B Williams) (Mrs O Clatworthy)

In determining any future planning application the impact of operations and associated works will be required to be mitigated to an acceptable level.

- **Impact on tourism** (Mrs O Clatworthy) (Mrs Y Walker)

Any impact on tourism will be for the duration of the operation of the site and will be balanced against the benefits to the local economy. Conditions attached to any planning permission for the restoration of the site will be able to ensure that it is restored to a condition which supports tourism.

- **Inadequate road network** (Mrs B Williams)

It is agreed that one of the main issues with developing this site is the issue of access. Unless a solution can be found the site will not be developed. It should be noted that access cannot be gained from Blaenau Gwent.

- **Impact of dust and noise and light** (Mrs B Williams) (Mrs N Kerr) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy) (Mr G Francombe) (Mrs Y Walker)

In determining any future planning application the impact of operations and associated works will be required to be mitigated to an acceptable level.

- **Impact on health** (Mrs N Kerr) (Mr & Mrs H Clatworthy)

In determining any future planning application the impacts on health will be considered and will be required to be within acceptable limits.

- **Impact of traffic** (Mrs N Kerr) (Mr & Mrs H Clatworthy) (Mr Gareth Francombe)

In determining any future planning application proposals would be required to be acceptable in terms of highway and transportation considerations. It should be noted that access will not be through Blaenau Gwent.

- **Impact on ground waters** (Mrs O Clatworthy) (Mrs Y Walker)

In determining any future planning application the effects on surface water, groundwater resources and supplies will have to be acceptable. The EA will

advise the Council on this. It should be noted that whilst the EA identified issues at the site they have not objected to its identification as a Preferred Area.

- **Loss of recreation resource** (Mr G Holloway) (Mrs O Clatworthy) (Mr & Mrs H Clatworthy)

Any loss is likely to be for the duration of the operations, it should be possible to ensure the site is restored to ensure the site can be used as a recreation resource.

- **The way the site was chosen** (Mr & Mrs H Clatworthy)

The site was chosen through a call for Candidate Sites. Following this, Blaenau Gwent in association with other former Gwent authorities commissioned Cuesta Consulting to address the aggregate mineral safeguarding and apportionment requirements of the South Wales Regional Technical Statement (RTS). This study suggested that this site should be allocated, however given there was insufficient evidence to support allocation it was decided to identify the site as a Preferred Area.

- **Problems with Torfaen application** (Mr & Mrs H Clatworthy)

It is accepted that there are issues which still need to be addressed before a decision on the planning application can be made by Torfaen. If planning permission is not granted then the Preferred Area in Blaenau Gwent will not be worked. The reasoned justification explains this.

- **Impact on heritage** (Mr & Mrs H Clatworthy)

The Glamorgan and Gwent Archaeological Trust noted a restraint and advised that an archaeological evaluation will be required prior to the determination of a planning application. In determining any future planning application any adverse impacts on important features will need to be mitigated. The noise from the proposed scheme is unlikely to have a negative impact on the Grade II listed building at St Illtyds, over a mile away but again this issue will be dealt with at the planning application stage.

- **Mineral not viable** (Mr G Holloway)

The 'Former Gwent' Aggregates Safeguarding Study (2009) suggests that the site is viable. To identify a Preferred Area the Council only needs to ensure that a site has 'some commercial potential'.

- **Impact on geology** (Mr & Mrs H Clatworthy)

It is noted that the site known as Llanhilleth Quarries is one of very few significant exposures of measures in the "Rider" portion of stratigraphy. The site offers great research potential since it provides clear access to some of the youngest beds in the eastern end of the coalfield. There are only one or two other small and inferior examples of this formation exposed locally in small quarries and walling pits. However, it is suggested that reclaiming the overburden mounds should have no detrimental effect on their geological value; indeed there is an opportunity for the geological value to be improved as part of the site restoration scheme securing "better" exposure, legal & safe public access, information boards, etc. It should be noted that Policy DM19 requires that there is no adverse impact on nationally protected geological features.

- **Exploitation of the area** (Mrs O Clatworthy) (Mr & Mrs H Clatworthy) (Mr G Francombe)

A number of the objectors raise concerns with the fact that the area has been subjected to mining in the past and do not want to see the area exploited again. It is recognised that the extraction of mineral resources is often emotive as minerals can only be worked where they occur. However one of the key principles of Minerals Planning Policy Wales is to 'encourage efficient and appropriate use of minerals and the re-use and recycling of suitable materials'. The reworking of this site involves the recovery of secondary material, which is a more sustainable option that relieves the pressure on primary extraction. It should be noted that the proposed operation will be limited to the removal of rock from the existing spoil tip and the application would be required to ensure that impacts including the duration of the development can be mitigated to acceptable levels.

- **Impact on horse riding route** (Ms J Lewis)

It is noted that a restricted Byway and a Bridleway cross the site. The developer would need to apply through separate legislation to divert these routes for the duration of the operations.

- **The site should be allocated for amenity, tourism or leisure use** (Mr G Holloway) (Mrs Y Walker) (GWT)

Disagree. Tourism and leisure allocations have been considered through the candidate site process and through liaison with the Councils Leisure Department. This site was not identified for such use through either process. The LDP, however, does support the development of such proposals in (SP2) and it may be possible to consider such an after-use through any restoration plans for the site.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

**Chapter: 9.0 Delivery and Implementation
(Paragraphs: 9.1 – 9.7)**

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
10D.258	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Raises concerns about the cumulative impact of development in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of bats moving from the SAC into areas of countryside to the west and south.
10D.259	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Raises concerns about the cumulative loss of connectivity that will result from the development of R1.1, MU1 and EMP1.8.
10D.261	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development at H1.14 should protect the integrity of the Six Bells Colliery Site SINC. This detail should be specified as a requirement in Chapter 9.0.
10D.262	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development at H1.15 should protect the integrity of the Six Bells Colliery Site SINC. This detail should be specified as a requirement in Chapter 9.0.
10D.263	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development at H1.18 should avoid the area of Greenmeadow Farm SINC. This detail should be specified as a requirement in Chapter 9.0.
10D.264	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development at H1.20 should avoid the area of Cefn Bach SINC which the site encroaches onto. This detail should be specified as a requirement in Chapter 9.0.
10D.266	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Welcomes the extension of the rail link but recommends that the LDP include a provision within Chapter 9.0 to protect the integrity of the adjacent River Ebbw Fach SINC, and

			landscape features which supports its role as an ecological corridor.
10D.269	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Where proposals involve improvement works to existing routes (policies T5 and T6) consultation should be undertaken with ecologists and the Highway Verge Management Plan to ensure there are no adverse impacts on highway verge SINC and biodiversity.
10D.274	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development within EMP2.13 should avoid the area of woodland within the site. This should be included as an allocation requirement within Chapter 9.0.
10D.275	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development at allocation EMP2.14 should seek to maintain the integrity of the Ebbw River South Section SINC and retain landscape features. This should be included as an allocation requirement within Chapter 9.0.
10D.276	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Any development at ED1.2 should avoid the River Ebbw Fach SINC and a landscape buffer is retained along the SINC. This should be included as an allocation requirement in Chapter 9.0.
18D.34	Environment Agency Wales (EA)	Unsound (CE4)	The scale of development being proposed on sites likely to be affected by land contamination could be crucial in terms of the deliverability of the development proposals within the Plan.
18D.163	Environment Agency Wales (EA)	Unsound (CE4)	For clarity change the title of the final column of the Survey Requirements table from Ground Investigation to Preliminary Risk Assessment (PRA) to reflect the terminology in the Site Descriptions Document.
18D.164	Environment Agency Wales (EA)	Unsound (CE4)	The Survey Requirements for sites H1.3, H1.17, EMP1.3 EMP1.6, EMP1.10 are at odds with the site descriptions

			document.
19D.98	DPP for Newbridge Construction Ltd (DPP)	Sound	Supports the phasing of development of MU1 set out at section 9.3.
22D.100	GVA for Linc Cymru Housing Association Ltd (GVA)	Unsound (CE2, CE4)	HC1.7 should be identified in Phase 1 as opposed to Phase 2 as it is available for delivery in the short term.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

<p>The key issues identified in the representation (s) is as follows:</p> <ul style="list-style-type: none"> • Cumulative impact of development on the commuting and foraging of bats that will result from the development of MU1, EMP1.5, EMP1.8 and T6.1 (CCW) • Cumulative loss of connectivity that will result from the development of R1.1, MU1 and EMP1.8 (CCW) • Protecting the integrity of the SINC should be specified as a requirement in Chapter 9.0 under allocation H1.14, H1.15 and T2.4 (CCW) • Any development at H1.18 and H1.20 should avoid the area of the SINC (CCW) • For allocations in policies T5 and T6 consultation should be undertaken with ecologists and the Highway Verge Management Plan (CCW) • Avoid development within the area of woodland of EMP2.13 (CCW) • Any development at EMP2.14 should maintain the integrity of the adjacent SINC and landscape features (CCW) • Any development at ED1.2 should avoid the SINC and ensure appropriate landscape buffering is provided (CCW) • Questions the deliverability of development proposals when a number of sites are affected by land contamination (EA) • Clarity required on terminology used in Survey Requirements table and Site Descriptions document (EA) • The Survey Requirements for sites H1.3, H1.17, EMP1.3 EMP1.6 and

EMP1.10 are at odds with the site descriptions document (EA)

- Supports the phasing of development of MU1 (DPP)
- HC1.7 should be identified in Phase 1 as opposed to Phase 2 (GVA)

Desired Changes to LDP

- Chapter 9.0 should highlight the potential for in-combination effect of these allocations on SAC features, and make provision to ensure that any development at these allocations should provide for appropriate bat movement/commuting routes (CCW)
- Chapter 9.0 should be amended to ensure the development of R1.1 makes provision for appropriate connectivity in combination with sites allocated in MU1 and EMP1.8 (CCW)
- Under allocation H1.14, H1.15 and T2.4 of Chapter 9.0, the protection of the integrity of the SINC should be specified as a requirement (CCW)
- Under allocation H1.18 and H1.20 of Chapter 9.0, any development should avoid the area of SINC. This should be specified as an allocation requirement (CCW)
- Include a reference in Chapter 9.0 that consultation should be undertaken with the Council's ecologists and Highway Verge Management Plan for policies T5 and T6 (CCW)
- Include a requirement within Chapter 9.0 that any development within EMP2.13 should avoid the area of woodland within the site (CCW)
- Include a requirement within Chapter 9.0 that any development within EMP2.14 should maintain the integrity of the adjacent SINC and landscape features (CCW)
- Include a requirement within Chapter 9.0 that any development should avoid the SINC and provide appropriate landscape buffering (CCW)
- The Council should consider the matter further in order to build an appropriate level of flexibility into the Plan and to deal with unforeseen issues that may arise (EA)
- Amend the title of the final column of the survey requirements table from 'Ground Investigation' to 'Preliminary Risk Assessment' (PRA) (EA)
- Update the survey requirements table and site descriptions document for sites H1.3, H1.17, EMP1.3 EMP1.6 and EMP1.10 to ensure consistency (EA)
- Identify the development of HC1.7 to take place in phase 1 (GVA)

COUNCIL RESPONSE

Council Analysis

- **Cumulative impact of development on the commuting and foraging of bats that will result from the development of MU1, EMP1.5, EMP1.8 and T6.1 (CCW)**

CCW raises concerns about the cumulative impact of development in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of any bats moving from the SAC into areas of countryside to the west and south of Ebbw Vale.

Disagree. Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. The change requested is therefore not appropriately located in this table. This issue is to be addressed in the survey requirement table where we identify that a project level HRA will be required.

- **Cumulative loss of connectivity that will result from the development of R1.1, MU1 and EMP1.8 (CCW)**

In combination with Rhyd y Blew SINC allocation R1.1 provides an important link within the area for ecological connectivity.

Disagree. This issue is to be addressed in the survey requirement table where we identify that a project level HRA will be required.

- **For allocations in policies T5 and T6, where proposals involve improvement works to existing routes, consultation should be undertaken with ecologists and the Highway Verge Management Plan (CCW)**

Disagree. Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. The change requested is therefore not appropriately located in this table. It is considered more appropriately located within the site descriptions document.

Agree to update the site descriptions for policies T5 and T6 to ensure that appropriate consultation is undertaken with ecologists and the Highways Verge Management Plan.

- **Under allocation H1.14, H1.15 and T2.4 of Chapter 9.0, the protection of the integrity of the SINC should be specified as a requirement (CCW)**

Disagree. Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. At the end of the chapter is a Survey Requirements table which requires a full ecological survey and a biodiversity constraints and enhancement plan as part of any future planning application at this site. Policy DM15 also seeks to protect and enhance sites designated as SINC or those in close proximity.

The level of detail required from the representor is considered more appropriately located within the site descriptions document.

Agree to update the site description for allocation H1.14, H1.15 and T2.4 to reflect that any development of the site should protect the integrity of the SINC and that the detailed design of the development and any open space provision will be critical to its protection.

- **Under allocation H1.18 and H1.20 of Chapter 9.0, any development should avoid the area of SINC. This should be specified as an allocation requirement (CCW)**

Disagree. With regard to allocation H1.18, since the base date of 2009, the site was granted full planning permission for 22 affordable units in June 2010. A small section, located to the south east of this site is designated as a SINC. The approved scheme avoids development within the SINC designation.

However, the site description should be strengthened to reflect that any development of the site should protect the integrity of the SINC and any open space provision will be critical to its protection.

With regard to allocation H1.20, as covered in Policy DM15 and the national policy framework, the non-statutory SINC designation should not unduly restrict acceptable development. Compensatory provision will be made equivalent to that lost to the development. The part of the allocation that is designated as a SINC is a former playing pitch. It is therefore not considered appropriate to state this requirement.

However, the site description should be strengthened to reflect that any development of the site should protect the integrity of Cefn Bach SINC and that the detailed design of the development and any open space provision will be critical to its protection.

- **Avoid development within the area of woodland of EMP2.13 (CCW)**

Disagree. The purpose of policy EMP2 is to protect sites for employment use in line with their status in the employment hierarchy. The sites are therefore not listed within Chapter 9.0 or the site descriptions document. Any future development within the site boundary of EMP2.13 will be subject to the development management policies of the Plan. DM16 and DM17 cover the protection and enhancement of the green infrastructure and trees, woodland and hedgerow. Therefore the suggested amendment is considered unnecessary. .

- **Any development at EMP2.14 should maintain the integrity of the adjacent SINC and landscape features (CCW)**

The purpose of policy EMP2 is to protect sites for employment use in line with their status in the employment hierarchy. The sites are therefore not listed within Chapter 9.0 or the site descriptions document. Any future development within the site boundary of EMP2.14 will be subject to the development management policies of the Plan. DM15 and DM16 cover the protection and enhancement of the natural environment. Therefore the suggested amendment is considered unnecessary. .

- **Any development at ED1.2 should avoid the SINC and ensure appropriate landscape buffering is provided (CCW)**

Disagree. The part of the site that is designated as a SINC is the River Ebbw Fach, therefore development is not appropriate in this location. However in terms of providing appropriate landscaping buffering this should be reflected in the site description of ED1.2. The purpose of Chapter 9.0 is to identify the infrastructure needs, phasing of development, funding sources and who is

responsible for the delivery of the allocations rather than specific site requirements such as landscaping.

- **Questions the deliverability of development proposals when a number of sites are affected by land contamination (EA)**

Disagree. The allocations made in the Plan were subject to a rigorous site assessment process to ensure they were developable, sustainable and in accordance with the LDP Strategy. The site assessments took into account a cross cutting range of issues, including a view from environmental health regarding land contamination. A precautionary approach was adopted by environmental health where if the site was previously used for a contaminating land use it was identified as having land contamination issues. In actual fact a number of the sites have already been redeveloped and have dealt with the contamination issues. At meetings held to determine the suitability of sites a member of the property department was at hand to provide advice on site viability. A number of sites were taken out due to concern regarding known issues.

In terms of both housing and employment, flexibility is built into the Plan. For housing whilst there is a shortfall of 3,500 houses. We actually provide 3,932 houses which provides a flexibility of 12%. Whereas for employment the flexibility is built into the methodology of how much land is required.

Nevertheless new requirements in terms of monitoring the Plan and the revised housing land availability process will ensure that any sites which have contamination issues which impact on site viability are noted and acted upon. Where necessary any sites where there are viability issues the Council can agree to reduce or negate any S106 requirements. Where a site is still unviable the Council will need to take a view on the importance of bringing the site forward and look to identify grant funding or take a decision to delete the site from the Plan. This could be undertaken through the annual monitoring process or the 4 year review.

The Council is confident that this issue has been addressed.

- **Clarity required on terminology used in Survey Requirements table and Site Descriptions document (EA)**

Agree. For clarity between Chapter 9.0 and the Site Descriptions document, delete the title 'Ground Investigation' of the final column of the survey requirements table and replace with 'Preliminary Risk Assessment (PRA)'.

- **The Survey Requirements for sites H1.3, H1.17, EMP1.3 EMP1.6 and EMP1.10 are at odds with the site descriptions document (EA)**

Using the information in the Site Descriptions document, the EA point out that some information is missing from the survey requirements table. Sites H1.3 and H1.7 should include a requirement for a Preliminary Risk Assessment (PRA). Sites EMP1.3 and EMP1.6 should include a requirement for a Flood Consequence Assessment (FCA). The survey requirements table for EMP1.10 identifies the need for a FCA and ground investigation yet there is no mention of these requirements in the site descriptions document.

Agree. Update the Survey Requirements Table for allocations H1.3 and H1.7

to identify that a Preliminary Risk Assessment is required and EMP1.3 and EMP1.6 to identify that a Flood Consequence Assessment is required as stated in the Site Descriptions document.

In addition also agree to update the site description of policy EMP1.10 to identify the need for a site-specific flood consequence assessment during the planning application stage.

- **Supports the phasing of development of MU1 (DPP)**
Support welcomed.

- **HC1.7 should be identified in Phase 1 as opposed to Phase 2 (GVA)**
Disagree. The Delivery and Implementation Chapter reflects that the base date of the Plan is 2009. The phasing of development column estimates the completion of development in terms of 3 phases. Sites are included in Phase 1 if planning permission has been granted and construction is underway. At 2009, HC1.7 was granted planning permission subject to the signing of S106 agreement. It is acknowledged that in March 2010 the S106 agreement has been signed and planning permission issued. However, it remains the view that the completion of the development will be after 2011 which is the second phase of the plan. Work on the site has not started yet. Therefore the Delivery and Implementation section should not be updated.

However, the Site Descriptions for HC1.7 should be updated to reflect that the section 106 agreement has been signed and planning permission issued.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the title 'Ground Investigation' of the final column of the survey requirements table is deleted and replaced with 'Preliminary Risk Assessment (PRA)'.

That the Council recommend to the Planning Inspector that the Survey Requirements Table for allocations H1.3 and H1.7 is updated to identify that a Preliminary Risk Assessment is required.

That the Council recommend to the Planning Inspector that the Survey Requirements Table for allocations EMP1.3 and EMP1.6 is updated to identify that a Flood Consequence Assessment is required.

All these changes are identified at Appendix 1.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

Appendix 1 – Monitoring Framework

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
3D.145	Welsh Government (WG)	Unsound (CE2, CE3, CE4)	The mechanisms for implementation and monitoring need to be sufficiently clear and sensitive to provide an alert of any lack of activity in particular on key sites. Issues regarding: SP1, SP2, SP4 & 5, MU1-3.
10D.298	Countryside Council for Wales (CCW)	Unsound (C2, CE1, CE2)	Recommend that the trigger point to consider review of the policy for Indicator 'LI19' should be lowered to a figure that more accurately recognises the significance of biodiversity losses in the County Borough.
10D.299	Countryside Council for Wales	Unsound (C2, CE1, CE2)	Recommends that the trigger point to consider review for Indicator 'LI20' should be amended to 'any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010.'
18D.174	Environment Agency Wales (EA)	Unsound (CE4)	The data source related to development in flood risk zone C should not be the Environment Agency but BGCBC planning applications.
24D.598	Home Builders Federation (HBF)	Unsound (CE2, CE4)	The Monitoring Schedule should include information to monitor the vacancy rate and provide trigger points to review the housing requirement if the Council is successful in reducing the rate.

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:	
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

Summary of Key Issues

The key issues identified in the representation (s) are as follows:

- The mechanisms for implementation and monitoring need to be sufficiently clear and sensitive (WG)
- Objects to the trigger point for LI 19 (CCW)
- Recommends the rewording of the trigger point for LI 20 (CCW)
- Objects to the data source of SP7 Objective 6 (EA)
- Monitor the vacancy rate and provide trigger points to review the housing requirement (HBF)

Desired Changes to LDP

- The monitoring framework needs to be sufficiently clear with regard to monitoring targets and trigger points for review particularly SP1, SP2, SP4 & 5, MU1-3 (WG)
- Amend the trigger point of LI 19 to a lower figure (CCW)
- Reword the trigger point for review wording to read:
- 'Any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010' (CCW)
- Amend the data source from the Environment Agency to BGCBC planning applications (EA)
- Include information to monitor the vacancy rate and provide trigger points to review the housing requirement if the Council is successful in reducing the rate (HBF)

COUNCIL RESPONSE

Council Analysis

- **The mechanisms for implementation and monitoring need to be sufficiently clear and sensitive (WG)**
WG object to the monitoring framework on the basis that the framework doesn't appear to be sufficiently clear with regard to the monitoring targets and trigger points for review. Specific examples of this are identified in SP1, SP2, SP4 & 5, MU1-3.
With regard to SP1, WG consider that it is not clear as to the timescale for the 85% target and when the 'less than 20%' trigger point will kick in.

Disagree. It is considered that the WG have misinterpreted the monitoring targets for CI 1, CI 2 and CI 10. The monitoring targets seek to monitor the amount of new retail, office, leisure, dwelling and employment developments to be developed in the northern strategy area rather than the timing of when the developments are likely to happen.

However the monitoring targets and trigger point have been amended to provide sufficient clarity and sensitivity. Appendix 2 shows the amendments that have been made.

With regard to SP2, WG consider that a trigger of 0% by 2021 is meaningless for the monitoring of progress within the plan period.

Agree. Throughout the monitoring framework where a trigger of 0% by 2021 has been included, it is agreed to update to the following:

~~0% completion~~ *Failure to Deliver*

For Policies SP4 and SP5, WG consider the trigger ranges for additional dwellings are too great.

Agree. The trigger points have been revised from '-50%' to '-10%' in Table 4 and 5. In accordance with this, the trigger range for the delivery of employment land has also been revised from '-50%' to '-10%'.

WG also argue that there is an evident anomaly between the trigger ranges in SP4 and SP5 and the triggers provided for population increase for Policy SP4.

Disagree. The Housing need to be met by the Plan is based on Assembly Government Household Projections for Blaenau Gwent which identify the need for 3,932 dwellings between 2006-2021. A reduced figure of 3,500 is identified in the Plan to reflect the Council's plans to reduce the number of vacant properties in the area.

The figure is based on a population increase of 2,135 but only a quarter of this is as a result of migration to the area, the rest is from natural changes, that is more births than deaths. The reason a greater number of houses are needed is due to the reduction in the number of people living in each house. This reflects societal changes such as an aging population and more people choosing to live alone or in smaller households.

WG consider that it is not clear that the monitoring framework will provide monitoring information specific to progress on the three strategic site allocations MU1-3.

Agree. Include a local indicator in Table 1: Strategic Policy 1 to monitor the delivery of the mixed use allocations.

- **Objects to the trigger point for LI 19 (CCW)**

CCW object to the trigger point for LI 19 on the basis that the target is for 100% of schemes which involve the loss of SINCs or LNRs to provide compensation and given that that the UK recently failed its biodiversity targets.

Agree. Reduce the trigger point in LI 19 from '-25%' to '-10%'.

- **Recommends the rewording of the trigger point for LI 20 (CCW)**
Agree. Delete 'no trigger' and replace with '*any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010*'
- **Objects to the data source of SP7 Objective 6 (EA)**
Agree. Delete Environment Agency as the data source of SP7 Objective 6 and replace with *BGCBC planning applications*.
- **Monitor the vacancy rate and provide trigger points to review the housing requirement (HBF)**
Agree. Include a local indicator in Table 4: Strategic Policy 4 to monitor the percentage of vacant residential properties.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Monitoring Framework be amended to provide sufficient clarity and sensitivity.

Appendix 2 shows the amendments that have been made.

Reason for Recommendation

The proposed change is not substantive but would improve the clarity of/remove any ambiguity in the LDP. Importantly the change would not affect the soundness of the plan.

**PART 2: NEW SITES AND
SETTLEMENT
BOUNDARY
AMENDMENTS**

Alternative Site Ref: AS (N) 01
Alternative Site Name: Nant y Croft

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
4D.170	Mrs B Hamm	Unsound (CE2)	This site should be included in the Plan as a housing allocation. The site has good access to amenities, utilities, and the highway network. The site is acceptable in terms of biodiversity interests and has planning permission in the past.

Representation – Alternative Site AS (N) 01

No	Name	Support /Object	Comment
10AS.715	Countryside Council for Wales (CCW)	Object	CCW object to the site because no Sustainability Appraisal has been submitted, the site is adjacent to a SINC, no justification for further housing allocations, loss of an important buffer between Ebbw Vale and Rassau Industrial Estate. CCW consider the site is contrary to the Regeneration Strategy and policies to protect the environment.
92AS.604	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of the site, however development should not impact the adjacent SINC.
208AS.662	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (Mrs B Hamm):
 - Good access to amenities, utilities, and the highway network.

- Acceptable in terms of biodiversity interests
- Planning permission has been approved in the past

Desired Changes to LDP

- Inclusion of the land at Nant y Croft as a housing allocation in the Plan (Mrs B Hamm)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - SA/ SEA and LDP Strategy**
 - No Sustainability Appraisal has been submitted (CCW)
 - No justification for further housing allocations (CCW)
 - Contrary to the Regeneration Strategy and policies to protect the environment (CCW)
 - Too many housing allocations proposed in the Plan (Mrs Y Walker)
 - Countryside and Landscape**
 - Loss of an important buffer between Ebbw Vale and Rassau Industrial Estate (CCW)
 - Other Issues**
 - The local infrastructure cannot cope with the extra number of houses (Mrs Y Walker)
- Support for site although consideration should be given to the adjacent SINC (GWT)

Desired Changes to LDP

- No change to the Plan (CCW) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be included in the Plan** (Mrs B Hamm)

The site was previously assessed as part of a larger site and rejected under the Candidate Site Assessment Process (Candidate Site No. B35). The site was considered to be unsuitable for residential development on the grounds of the site is of high ecological value and qualifies as a SINC; the site has landscape value; and the site is not well located in terms of community facilities and public transport. No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Planning Issues:

Stage 1 of the candidate site assessment process involved undertaking a general planning assessment of the site. One element of this was to identify if the site was located within 400m of a public transport access point and a community facility. The assessment considered that the site was not located within 400m of these facilities as the nearest bus stop is located at Stonebridge Road (900m away) and the nearest facilities is Morrisons which is 1,000m away.

Stage 3 of the assessment involved consultation with external bodies who issued a standard advice note and have identified the position of appropriate apparatus. Therefore no objections were received from the utility companies.

It is recognised that the site has a history of outline planning permissions, the first having been granted in December 2000. This was subsequently renewed in September 2003, November 2006 and more recently in December 2009. The permission is for the development of 3 dwellings on a small part of the site, measuring approximately 0.3 hectares.

Highways View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain. It is acknowledged through the highways assessment undertaken that relatively easy access is obtainable to the site although there are some constraints present. A new access road needs to be constructed at the western end of the site to serve the whole development plateau and no additional traffic movements would be permitted further along Rassau Road.

Countryside and Landscape View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Ecology View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain. It is considered that the site is of biodiversity value as the western field qualifies as a SINC. A field to the west has drain-running adjacent to eastern margin, field is enclosed by a dry stone wall at the north, fence to the west and fenced stone wall to the east. There are some areas with localised species richness. The presence of a large pond at the southern boundary also indicates that there is presence of habitat suitable for protected species.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land.

The site has the benefit of planning permission and is located within the settlement boundary, therefore it is not considered necessary to allocate this land. If small sites come forward which address the issues raised they will count towards the windfall contribution.

- **Objects to the inclusion of this site (CCW) (Mrs Y Walker)**

All comments received are noted.

- **Support for site although consideration should be given to the adjacent SINC (GWT)**

Noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 02
Alternative Site Name: Land at Big Lane– Site 4

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
17D.167	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	This site should be included in the Plan as a housing allocation as it's a natural extension of the existing residential area with access to the existing highway network and established local community services.

Representation – Alternative Site AS (N) 02

No	Name	Support /Object	Comment
10AS.716	Countryside Council for Wales (CCW)	Object	CCW object to the site because the development would be poorly related to existing settlement form and result in an isolated form of development in this prominent common area. The site is contrary to the Plan's strategy and policies to protect the environment, particularly when there is adequate housing provision in the Plan.
92AS.605	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of this site, however development should not impact the adjacent SINC.
116AS.996	Miss N Jenkins	Object	Objects to the inclusion of the site on the grounds that the site is a place of natural beauty rich in biodiversity. Development of this site would cause drainage issues; increased traffic; and health problems from resulting pollution.
117AS.994	Miss D Jenkins	Object	Objects to the inclusion of this site on the grounds that there are other locations throughout the Borough that are more suitable. Development of this

			site would impact on the natural habitat and greenfield land where in the past harvesting took place; drainage issues; increased traffic and pollution.
118AS.991	Mr S Bracken	Object	Objects to the inclusion of this site on the grounds that the site is used for recreational purposes, grazing animals and wildlife; is located next to the LNR; the highway network cannot cope with the additional traffic; and the land around Morrisons is more suited for development than this area. Development of this would result in the loss of green wedge.
121AS.982	Mr D J Markey	Object	Objects to the inclusion of this site on the grounds that the site is greenfield land and would encroach on the LNR; impact on biodiversity; result in additional traffic and pollution. Development of this site would result in the loss of the green wedge.
124AS.976	Mr D Norris	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic pollution affecting quality of life; impact on local schools; impact on Brecon Beacons National Trust; impact on wildlife; and result in traffic congestion.
143AS.957	Mrs B Williams	Object	Objects to the inclusion of the site on the grounds that the development would impact on the adjacent LNR adversely impacting on wildlife; loss of a popular green area and recreational facility; and the development would create additional traffic and pollution reducing the quality of life for residents.
144AS.950	Mrs S White	Object	Objects to the inclusion of this site on the grounds that the

			development would result in the loss of green wedge; increased traffic and pollution; impact on the quality of the adjacent landscape; biodiversity and the Ebbw Fach trail.
146AS.938	Mr D White	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of the green wedge; increase pressure on local amenities; increase traffic; and impact on protected species. Also questions the need for further housing. Impact upon Ebbw Fach Trail.
147AS.934	Mrs S Davies	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic and pollution; and highway safety with a number of accidents occurring.
149AS.900	Mr V Williams	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic, noise and pollution; loss of a recreational facility; impact on wildlife and biodiversity, unacceptable encroachment on the LNR and the Ebbw Fach trail, all resulting in a reduced quality of life for residents.
156AS.776	Mr A Walls	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; Beaufort woodlands is a popular recreation facility; beautiful landscape; impact on biodiversity; increased traffic and pollution; inadequate road infrastructure; and the impact on the local school.
158AS.762	Mrs D Owen	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; impact on areas of natural beauty and wildlife;

			increase traffic and pollution; highway safety concerns; inadequate road infrastructure; and the impact on the local school.
172AS.888	Mrs M Penny	Object	Objects to the site on the grounds that the site is a greenfield site close to areas rich in wildlife, flora and fauna; Beaufort woodlands adjoins the site with is a popular recreational facility; and inadequate road infrastructure. The development would result in increased pollution; and the loss of the green wedge.
173AS.881	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield land; and there are sufficient brownfield sites available. The development would result in the loss of a recreational facility; impact on biodiversity; increase traffic and pollution; create parking problems; and the loss of the green wedge.
174AS.682	Mr S Penny	Object	Object to the site on the grounds that the site is greenfield land of high biodiversity value; and there are sufficient brownfield sites available. The development would result in the loss of a recreational facility; increase traffic and pollution; create parking problems; and the loss of the green wedge.
175AS.680	Mr M Bayliss	Object	Objects to the site on the grounds that the site is green belt land of high biodiversity value with a number of protected species present; local amenities are at full capacity. The development would result in congested roads and increased pollution.
176AS.679	Miss M Owen	Object	Objects to the site on the grounds that the site is greenfield land of biodiversity

			and landscape value; and schools at full capacity. The development would result in the loss of the green wedge; increased traffic congestion and pollution; car parking concerns; and impact on local amenities.
186AS.655	Reverend T Ebenezer	Object	Objects to the site on the grounds that the development would result in an increase in the volume of traffic, which is also a local policing issue; and an increase in the number of children that would need to be educated in the local school.
194AS.633	Mr D Morgan	Object	Objects to this site on the grounds that the development would result in the loss of the green wedge and quality landscape; impact on biodiversity and protected species; increased traffic and pollution; and the local amenities will not cope with extra housing.
196AS.644	BGCBC – Education and Leisure	Comment	The site is part of the landscape setting of Beaufort Ponds.
198AS.875	Miss B Trapnell	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
199AS.868	Mr J Poole	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on

			biodiversity.
201AS.843	Miss A Williams	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; inadequate road infrastructure; increased air, noise pollution; car parking concerns; impact on biodiversity; pressure on local amenities. The site has poor public transport links and the land is unstable.
203AS.838	Mr R Rackham	Object	Objects to the site on the grounds that local services are unable to sustain extra population; need to maintain the green wedge; impact on wildlife, ponds, plants and trees; and extra traffic will cause air and noise pollution, which will effect biodiversity and highway safety
204AS.833	Mrs G Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
205AS.829	Mr T Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
207AS.825	Mr and Mrs RM Smith	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; traffic congestion is high at present and the development would increase this further to an unsustainable level; Big Lane is narrow; and there are pylons on site therefore health and safety concerns.
208AS.846	Mrs Y Walker	Object	There are too many housing allocations proposed in the

			Plan. The local infrastructure cannot cope with the extra number of houses.
209AS.821	Mrs P E Morgan	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; and local services will not cope with the increase in population. The development would impact on biodiversity and protected species; increase traffic and pollution levels.
210AS.811	Mr B Chambers	Object	Objects to the site on the grounds of traffic to and from the site will create a major hazard because Big Lane not suitable for further traffic; there is a weight restriction on A4047; and the junction of Big Lane and A4047 will increase in traffic.
215AS.803	Mr D Shepherd	Object	Objects to the site on the grounds of the impact on biodiversity; the increase in traffic; schools are at full capacity; need to maintain the green wedge; and the quality of the landscape and proximity to LNR and Parc Nant y Waun.
216AS.789	Mr P Shepherd	Object	Objects to the site on the grounds of the road infrastructure is inadequate; highway safety concerns; increased pollution; impact on schools; need to maintain the green wedge. The development of the site will reduce the quality of living and effect the quality of the landscapes.
218AS.786	Mrs E Shepherd	Object	Objects to the site on the grounds of the road infrastructure is inadequate; highway safety concerns; increased pollution; impact on schools; need to maintain the green wedge. The development of the site will reduce the quality of living and effect the quality of the

			landscapes.
219AS.800	Mrs N Takel	Object	Objects to the site on the grounds that the existing road infrastructure is inadequate; need to maintain the green wedge; the loss of open space and its impact on health and well being; traffic pollution; and Increased school traffic.
221AS.791	Mrs A Shepherd	Object	Objects to the site on the grounds that the site is greenfield land; impact on the quality of the landscape; environmental and historical concerns; impact on biodiversity; need to maintain the green wedge; inadequate access; volume of traffic; traffic pollution; and pressure on services.
224AS.1069	Mr F R Lynch	Object	Objects to the site on the grounds of that the site is greenfield land; need to retain the green wedge; visual impact; impact on biodiversity; traffic issues; impact on landscape quality and historical landscape; and impact on local schools.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (C2J):
 - Natural extension of the existing residential area
 - Good access to the existing highway network and established community services

Desired Changes to LDP

- Inclusion of the land at Big Lane as a housing allocation in the Plan (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

Evidence was submitted in part.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- **Objects to the inclusion of this site for the following reasons:**
 - Planning Issues**
 - Development poorly related to existing settlement form
 - Highways**
 - Highway safety concerns
 - Inadequate road infrastructure
 - Car parking concerns
 - Increased traffic
 - Countryside and Landscape**
 - Greenfield land
 - Falls within the green wedge
 - Quality of landscape
 - Impact on the Ebbw Fach trail
 - Ecology**
 - Impact on the adjacent SINC
 - Located in close proximity to the Local Nature Reserve
 - The site is rich in biodiversity with a high number of protected species on site
 - Environmental Health**
 - Increased pollution
 - Pylons on site therefore health and safety concerns
 - Land instability
 - Other Issues**
 - Other brownfield sites available for development
 - Drainage issues
 - Schools are at full capacity
 - Local services and amenities unable to sustain extra population
 - Loss of a popular recreational facility and open space
 - Impact on Brecon Beacons National Trust
 - Questions the need for additional housing
 - Disruption to utilities

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may be acceptable.

Council Analysis

- **The site should be included in the Plan (C2J)**

The site has not been previously assessed as a candidate site by the Council.

The site and the supporting evidence have been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The site is greenfield land and represents an illogical extension to the existing settlement. The development would result in an isolated form of development in a prominent, well-used area.

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

Highways View:

Access to the site is difficult due to numerous constraints. The substandard nature of the roads and footways serving Big Lane are inadequate for further residential development to be permitted via this route. The additional traffic movements could not be safely accommodated unless major upgrading works could be completed which would require third party ownership.

Countryside and Landscape View:

The proposal is outside the defined and tangible settlement boundary. The site is high ground visible from the Heads of the Valleys corridor and Brecon Beacons National Park to the north; therefore there are high visual impact concerns. The development of this site would result in the loss of open countryside, which is accessible to local communities, and the impact on the Special Landscape Area would be high.

Ecology View:

Development of this site is opposed, as the site is immediately adjacent to the Beaufort Hills Ponds and Woodland SIN and LNR. The site enhances the overall ecological value of the area and provides ecological connectivity particularly with the bordering hedgerows, which provide linear corridors for bats and other mobile species. The site has potential to support protected and priority species including reptiles, bats, nesting birds and a range of invertebrates. The site is grassland which is currently grazed and appears to be improved in some parts.

Environmental Health View:

The site is greenfield land therefore there is no risk of contamination.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives although no assessment has been undertaken against the LDP Strategy.

The Council has assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity and landscape value.

The site therefore performs poorly against the Sustainability Objectives when compared to other sites allocated for housing in the Plan.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 03**Alternative Site Name: Land at Bryn Farm – Site 5****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
17D.166	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	This site should be included in the Plan as a housing allocation as it's a natural extension of the existing residential area with access to the existing highway network and established local community services.

Representation – Alternative Site AS (N) 03

No	Name	Support /Object	Comment
10AS.717	Countryside Council for Wales (CCW)	Object	CCW objects to the site because development would result in encroachment into upland common between Beaufort and Brynmawr, identified as an SLA. The site is a SINC and forms part of green wedge. Contrary to objectives and policies within LDP.
92AS.606	Gwent Wildlife Trust (GWT)	Object	Objects to the development of this site which is designated as a SINC.
93AS.1022	Cllr J Hopkins	Object	Objects to the site on the grounds that there is a need to retain a green wedge between Beaufort and Brynmawr for biodiversity benefits and defined borders. Previous planning enquiry deemed that the wedge be retained.
116AS.995	Miss N Jenkins	Object	Objects to the site on the grounds that the land between Beaufort Hill and Brynmawr has always been designated as a green wedge and should remain this way.
118AS.993	Mr S Backen	Object	Objects to the site on the grounds of the land is used by farm animals and is a haven

			for wildlife; other brownfield land is available; questions the need for housing given the number of empty properties. The development would result in the loss of the green wedge; and pressure on roads and amenities.
121AS.986	Mr D J Markey	Object	Objects to the site on the grounds that the site is greenfield land; increased traffic pollution; loss of the green wedge; impact on the LNR and the wildlife in the area.
124AS.977	Mr D Norris	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic pollution affecting quality of life; impact on local schools; impact on Brecon Beacons National Trust; impact on wildlife; and result in traffic congestion.
146AS.946	Mr D White	Object	Objects to the site on the grounds of the loss of green wedge; increase in the volume of traffic; increase in pollution levels; and questions the need for housing. The Big Lane development was granted permission for 10 dwellings only due to highway issues.
147AS.935	Mrs S Davies	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic and pollution; and highway safety with a number of accidents occurring.
156AS.777	Mr A Walls	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; Beaufort woodlands is a popular recreation facility; beautiful landscape; impact on biodiversity; increased traffic and pollution; inadequate road infrastructure; and the impact on the local school.

158AS.763	Mrs D Owen	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; impact on areas of natural beauty and wildlife; increase traffic and pollution; highway safety concerns; inadequate road infrastructure; and the impact on the local school.
167AS.894	Mrs T Chaplin	Object	Object to the site on the grounds that the development would result in an increased volume of traffic; increased noise and air pollution; schools at full capacity and car parking problems; loss of green wedge impact on biodiversity at Beaufort Hill Ponds; and disruption to utilities.
168AS.892	Mr C Chaplin	Object	Object to the site on the grounds that the development would result in an increased volume of traffic; increased noise and air pollution; schools at full capacity and car parking problems; loss of green wedge impact on biodiversity at Beaufort Hill Ponds; and disruption to utilities.
172AS.890	Mrs M Penny	Object	Objects to the site on the grounds that the site is a greenfield site close to areas rich in wildlife, flora and fauna; Beaufort woodlands adjoins the site with is a popular recreational facility; and inadequate road infrastructure. The development would result in increased pollution; and the loss of the green wedge.
173AS.882	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield land; and there are sufficient brownfield sites available. The development would result in the loss of a recreational facility; impact on biodiversity; increase traffic and pollution; create parking

			problems; and the loss of the green wedge.
174AS.683	Mr S Penny	Object	Object to the site on the grounds that the site is greenfield land of high biodiversity value; and there are sufficient brownfield sites available. The development would result in the loss of a recreational facility; increase traffic and pollution; create parking problems; and the loss of the green wedge.
175AS.681	Mr M Bayliss	Object	Objects to the site on the grounds that the site is green belt land of high biodiversity value with a number of protected species present; local amenities are at full capacity. The development would result in congested roads and increased pollution.
176AS.678	Miss M Owen	Object	Objects to the site on the grounds that the site is greenfield land of biodiversity and landscape value; and schools at full capacity. The development would result in the loss of the green wedge; increased traffic congestion and pollution; car parking concerns; and impact on local amenities.
193AS.643	Brynmawr Town Council	Object	Objects to the site on the grounds that the green wedge should be maintained to prevent the coalescence between the Beaufort and Brynmawr settlements.
194AS.638	Mr D Morgan	Object	Objects to this site on the grounds that the development would result in the loss of the green wedge and quality landscape; impact on biodiversity and protected species; increased traffic and pollution; and the local amenities will not cope with extra housing.
196AS.647	BGCBC –	Comment	The site forms part of the

	Education and Leisure		historic landscape associated with Nantyglo and Beaufort Ironworks. The site is identified as a significant element of a wider historic landscape by CADW/GGAT as part of the South-east Wales Industrial Ironworks Landscapes project 2009.
198AS.876	Miss B Trapnell	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
199AS.869	Mr J Poole	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
201AS.844	Miss A Williams	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; inadequate road infrastructure; increased air, noise pollution; car parking concerns; impact on biodiversity; pressure on local amenities. The site has poor public transport links and the land is unstable.
203AS.839	Mr R Rackham	Object	Objects to the site on the grounds that local services are unable to sustain extra population; need to maintain the green wedge; impact on wildlife, ponds, plants and trees; and extra traffic will cause air and noise pollution,

			which will effect biodiversity and highway safety
204AS.834	Mrs G Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
205AS.830	Mr T Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
208AS.847	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
209AS.824	Mrs P E Morgan	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; and local services will not cope with the increase in population. The development would impact on biodiversity and protected species; increase traffic and pollution levels.
210AS.814	Mr B Chambers	Object	Objects to the site on the grounds of traffic to and from the site will create a major hazard because Big Lane not suitable for further traffic; there is a weight restriction on A4047; and the junction of Big Lane and A4047 will increase in traffic.
215AS.804	Mr D Shepherd	Object	Objects to the site on the grounds of the impact on biodiversity; the increase in traffic; schools are at full capacity; need to maintain the green wedge; and the quality of the landscape and proximity to LNR and Parc Nant y

			Waun.
221AS.793	Mrs A Shepherd	Object	Objects to the site on the grounds that the site is greenfield land; impact on the quality of the landscape; environmental and historical concerns; impact on biodiversity; need to maintain the green wedge; inadequate access; volume of traffic; traffic pollution; and pressure on services.
224AS.1070	Mr F R Lynch	Object	Objects to the site on the grounds of that the site is greenfield land; need to retain the green wedge; visual impact; impact on biodiversity; traffic issues; impact on landscape quality and historical landscape; and impact on local schools.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (C2J):
 - Natural extension of the existing residential area
 - Good access to the existing highway network and established community services

Desired Changes to LDP

- Inclusion of the land at Bryn Farm as a housing allocation in the Plan (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

Evidence was submitted in part.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Planning Issues**
 - Development poorly related to existing settlement form
 - Highways**
 - Increased traffic
 - Highway safety concerns
 - Inadequate road infrastructure
 - Car parking concerns
 - Countryside and Landscape**
 - Greenfield land
 - Falls within the green wedge
 - Quality of landscape
 - The site is identified as a significant element of a wider historic landscape
 - Ecology**
 - The site is designated as a SINC
 - Located in close proximity to the Local Nature Reserve
 - The site is rich in biodiversity with a high number of protected species on site
 - Environmental Health**
 - Increased pollution
 - Land instability
 - Other Issues**
 - Drainage issues
 - Other brownfield sites available for development
 - Schools are at full capacity
 - Local services and amenities unable to sustain extra population
 - Loss of a popular recreational facility and open space
 - Impact on Brecon Beacons National Trust
 - Questions the need for additional housing
 - Disruption to utilities

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.7.12 states that in green wedges there is a presumption against development that is inappropriate in relation to the purposes of the designation.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Para. 5.3.11 states that non statutory designations such as SINC can add value to the planning process, but should not unduly restrict acceptable development.

Para. 9.3.1 states that new housing development should avoid the coalescence of settlements.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may acceptable.

Council Analysis

- **The site should be included in the Plan (C2J)**

The site has not been previously assessed as a candidate site by the Council.

The site and the supporting evidence have been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The site is large piece of greenfield land and represents an illogical extension to the existing settlement. The development would result in an isolated form of development in a prominent, well-used area.

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

The site is designated as a SINC. All Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon

Taff. These criteria may be viewed in the document, which is part of the LDP evidence base. A copy of the authority's individual SINC site maps and corresponding site description and analysis are also available.

Part of the site is a green wedge designation. The site was considered suitable as a green wedge designation because it contributed to:

- Protection of vulnerable undeveloped land
- Protect urban form
- Protect open nature of the land
- Prevent coalescence between and within settlements

The Council's assessment of the site remains unchanged. Details of the Council's assessment of the green wedges can be found in the Environment Background Paper.

Highways View:

Vehicular access to the site would only be permitted directly off King Street. King Street is a classified road and is recognised as a Principal Route which is heavily trafficked. In order to facilitate access to any development proposal and also to serve other proposed sites within the immediate locality, a new junction would need to be constructed onto King Street in accordance with any recommendations of a Traffic Impact Assessment.

There are existing minor accesses serving the site via Big Lane which because of their substandard nature and that of Big Lane are not acceptable to be utilised as access to serve any further residential development.

Countryside and Landscape View:

The proposal is outside the defined and tangible settlement boundary. The site is high ground visible from the Heads of the Valleys corridor and Brecon Beacons National Park to the north; therefore there are high visual impact concerns. The development of this site would result in the loss of open countryside, which is accessible to local communities, and the impact on the Special Landscape Area would be high.

Ecology View:

Development of this site is opposed, as the site is within Pond Group 3 SINC designation. This habitat mosaic is important for the habitats present within it but also as it contributes to the value of the wider area – Beaufort Hills LNR and SINC. The site is known to support a diverse range of species including amphibians, invertebrates and mammals – this includes priority and protected species.

Environmental Health View:

The site is greenfield land and therefore there is no risk of contamination.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives although no assessment has been undertaken against the LDP Strategy.

The Council has assessed the site against the LDP Strategy and

Sustainability Objectives in accordance with the candidate site assessment process. The assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity, landscape and historic value. The site therefore performs poorly against the Sustainability Objectives when compared to the sites allocated for housing in the Plan.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations .

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 04
Alternative Site Name: Land at Big Lane – Site 6

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
17D.162	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	This site should be included in the Plan as a housing and recreational allocation. The site is a natural rounding off of the settlement, with access to the existing highway network and local community facilities. Development of this site would remove unattractive buildings. Land to the east can be used for informal recreational use and would mirror the extensive water based recreational facility to the west of Little Lane.

Representation – Alternative Sites AS (N) 04

No	Name	Support /Object	Comment
10AS.718	Countryside Council for Wales (CCW)	Object	CCW objects to the site because development would result in encroachment into upland common between Beaufort and Brynmawr, identified as an SLA. The site is a SINC and forms part of green wedge. Contrary to objectives and policies within the LDP.
92AS.607	Gwent Wildlife Trust (GWT)	Object	Objects to the development of this site which is designated as a SINC. However, no objection to the development of the field in the far western corner which is not designated as a SINC.
93AS.1021	Cllr J Hopkins	Object	Objects to the site on the grounds that there is a need to retain the green wedge which prevents the coalescence of the Beaufort and Brynmawr settlements.

121AS.984	Mr D J Markey	Object	Objects to the site on the grounds that the site is greenfield land; and it's proximity to the LNR and the detrimental effect it will have on wildlife, flora and fauna. The development of this site would result in the impact of increased traffic and pollution.
124AS.978	Mr D Norris	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic pollution affecting quality of life; impact on local schools; impact on Brecon Beacons National Trust; impact on wildlife; and result in traffic congestion.
125AS.974	Mr J Walbyoff	Object	Objects to the site on the grounds that the development would result in additional traffic congestion; traffic pollution; and impact on quality landscapes and biodiversity.
126AS.972	Mrs S Walbyoff	Object	Objects to the site on the grounds that the development would result in impacts on quality landscapes; visual impacts; create extra traffic congestion and pollution; and loss of the green wedge.
143AS.960	Mrs B Williams	Object	Objects to the site on the grounds that the increased population will increase traffic and associated noise and pollution, making life difficult and dangerous for residents; and loss of the green wedge would merge the communities of Beaufort and Brynmawr.
144AS.951	Mrs S White	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; increased traffic and pollution; impact on the quality of the adjacent landscape; biodiversity and the Ebbw Fach trail.
146AS.941	Mr D White	Object	Objects to the inclusion of this

			site on the grounds that the development would result in the loss of the green wedge; increase pressure on local amenities; increase traffic; and impact on the Ebbw Fach trail and LNR. Also questions the need for further housing.
147AS.936	Mrs S Davies	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic and pollution; and highway safety with a number of accidents occurring
149AS.902	Mr V Williams	Object	Objects to the site on the grounds that the development would result in an increase in traffic, noise and pollution; reduce the quality of life for residents; and development of this site would merge and destroy the distinct identities of the communities.
156AS.779	Mr A Walls	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; Beaufort woodlands is a popular recreation facility; beautiful landscape; impact on biodiversity; increased traffic and pollution; inadequate road infrastructure; and the impact on the local school.
158AS.765	Mrs D Owen	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; impact on areas of natural beauty and wildlife; increase traffic and pollution; highway safety concerns; inadequate road infrastructure; and the impact on the local school.
164AS.898	Mr J Lewis	Object	Object to the site on the grounds that the site is not in keeping with the adjoining wood and wetlands. Also the green wedge will be lost which prevents the coalescence of

			Beaufort and Brynmawr.
167AS.895	Mrs T Chaplin	Object	Object to the site on the grounds that the development would result in an increased volume of traffic; increased noise and air pollution; schools at full capacity and car parking problems; loss of green wedge impact on biodiversity at Beaufort Hill Ponds; and disruption to utilities.
168AS.893	Mr C Chaplin	Object	Object to the site on the grounds that the development would result in an increased volume of traffic; increased noise and air pollution; schools at full capacity and car parking problems; loss of green wedge impact on biodiversity at Beaufort Hill Ponds; and disruption to utilities.
172AS.889	Mrs M Penny	Object	Objects to the site on the grounds that the site is a greenfield site close to areas rich in wildlife, flora and fauna; Beaufort woodlands adjoins the site with is a popular recreational facility; and inadequate road infrastructure. The development would result in increased pollution; and the loss of the green wedge.
173AS.880	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield land; and there are sufficient brownfield sites available. The development would result in the loss of a recreational facility; impact on biodiversity; increase traffic and pollution; create parking problems; and the loss of the green wedge.
174AS.684	Mr S Penny	Object	Object to the site on the grounds that the site is greenfield land of high biodiversity value; and there are sufficient brownfield sites available. The development would result in the loss of a

			recreational facility; increase traffic and pollution; create parking problems; and the loss of the green wedge.
178AS.672	Miss S Kibby	Object	Objects to the site on the grounds that the development would result in an increase in the volume of traffic; the loss of the green wedge and village identity; an impact on the quality of the landscape; visual impact; and the impact on the natural wildlife and flowers.
179AS.669	Mr J Kibby	Object	Objects to the site on the grounds that the development would result in highway safety issues due to increased traffic; and the loss of the green wedge. Any housing development would encroach on the integrated and beautiful natural habitats that exists in the area
181AS.666	Mrs M Cosgrove	Object	Object to the site on the grounds that the site is greenfield land; and in close proximity to nature reserve. The development would result in increased traffic and pollution; and impact on biodiversity.
182AS.665	Mr D Baker	Object	Objects to the site on the grounds that the existing road infrastructure is insufficient to cope with increased demand; the existing school provision is insufficient to support further urbanisation; and the proposed area is a haven for wildlife.
184AS.661	Mrs S Llewelyn	Object	Objects to the site on the grounds that the site is greenfield, mountainside, moorland and an area of natural & historic beauty; the green wedge should be retained; the lack of infrastructure and facilities to support the development; and increased traffic.

185AS.660	D Llewelyn	Object	Objects to the site on the grounds that the proposed site is rich in wildlife and any development would destroy the natural habitats; and further development would encroach on the green belt which is at present marginal.
186AS.657	Reverend Ebenezer	Object	Objects to the site on the grounds that the development would result in an increase in the volume of traffic, which is also a local policing issue; and an increase in the number of children that would need to be educated in the local school.
188AS.651	Mrs G Kibby	Object	Objects to the site on the grounds of that the development would result in increased traffic volume; highway safety concerns; the loss of the green wedge between Beaufort and Brynmawr; visual impact; impact on the quality of the landscape; and the loss of wildlife and flowers.
193AS.645	Brynmawr Town Council	Object	Objects to the site on the grounds that the green wedge should be maintained to prevent the coalescence between the Beaufort and Brynmawr settlements.
194AS.635	Mr D Morgan	Object	Objects to this site on the grounds that the development would result in the loss of the green wedge and quality landscape; impact on biodiversity and protected species; increased traffic and pollution; and the local amenities will not cope with extra housing.
196AS.649	BGCBC – Education and Leisure	Object	Comments that the site is part of the historic landscape associated with Nantyglo and Beaufort Ironworks.
198AS.877	Miss B Trapnell	Object	Objects to the site on the grounds that the site is greenfield land which is well

			used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
199AS.870	Mr J Poole	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
201AS.845	Miss A Williams	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; inadequate road infrastructure; increased air, noise pollution; car parking concerns; impact on biodiversity; pressure on local amenities. The site has poor public transport links and the land is unstable.
203AS.840	Mr R Rackham	Object	Objects to the site on the grounds that local services are unable to sustain extra population; need to maintain the green wedge; impact on wildlife, ponds, plants and trees; and extra traffic will cause air and noise pollution, which will effect biodiversity and highway safety
204AS.835	Mrs G Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
205AS.831	Mr T Williams	Object	Objects to the site on the grounds of inadequate road

			infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
207AS.828	Mr and Mrs RM Smith	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; traffic congestion is high at present and the development would increase this further to an unsustainable level; Big Lane is narrow; and there are pylons on site therefore health and safety concerns.
208AS.848	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
209AS.822	Mrs P E Morgan	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; and local services will not cope with the increase in population. The development would impact on biodiversity and protected species; increase traffic and pollution levels.
210AS.815	Mr B Chambers	Object	Objects to the site on the grounds of traffic to and from the site will create a major hazard because Big Lane not suitable for further traffic; there is a weight restriction on A4047; and the junction of Big Lane and A4047 will increase in traffic.
215AS.805	Mr D Shepherd	Object	Objects to the site on the grounds of the impact on biodiversity; the increase in traffic; schools are at full capacity; need to maintain the green wedge; and the quality of the landscape and proximity to LNR and Parc Nant y Waun.
216AS.787	Mr P Shepherd	Object	Objects to the site on the

			grounds of the road infrastructure is inadequate; highway safety concerns; increased pollution; impact on schools; need to maintain the green wedge. The development of the site will reduce the quality of living and effect the quality of the landscapes.
218AS.785	Mrs E Shepherd	Object	Objects to the site on the grounds of the road infrastructure is inadequate; highway safety concerns; increased pollution; impact on schools; need to maintain the green wedge. The development of the site will reduce the quality of living and effect the quality of the landscapes.
219AS.798	Mrs N Takel	Object	Objects to the site on the grounds that the existing road infrastructure is inadequate; need to maintain the green wedge; the loss of open space and its impact on health and well being; traffic pollution; and Increased school traffic.
220AS.797	Mr L Takel	Object	Objects to the site on the grounds that there is a need to maintain the green wedge to prevent the coalescence of Beaufort and Brynmawr; quality of the landscape and its proximity to the LNR and Parc Nant y Waun. The development would result in increased traffic
221AS.794	Mrs A Shepherd	Object	Objects to the site on the grounds that the site is greenfield land; impact on the quality of the landscape; environmental and historical concerns; impact on biodiversity; need to maintain the green wedge; inadequate access; volume of traffic; traffic pollution; and pressure on services.

224AS.1072	Mr F R Lynch	Object	Objects to the site on the grounds of that the site is greenfield land; need to retain the green wedge; visual impact; impact on biodiversity; traffic issues; impact on landscape quality and historical landscape; and impact on local schools.
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Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (C2J):
 - The site is a natural rounding off of the settlement
 - Good access to the existing highway network and established community services
 - Remove unattractive buildings
 - Land to the east would mirror the extensive water based recreational facility to the west of Little Lane

Desired Changes to LDP

- Inclusion of the land at Big Lane as a housing and recreational allocation in the Plan (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

Evidence was submitted in part.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:

Highways

- Increased traffic
- Highway safety concerns
- Inadequate road infrastructure
- Car parking concerns

Countryside and Landscape

- Encroachment into upland common between Beaufort and Brynmawr
- The site is identified as an SLA
- Greenfield land
- Falls within the green wedge
- Quality of landscape
- Impact on the Ebbw Fach trail

Ecology

- Part of the site is designated as a SINC
- Located in close proximity to the Local Nature Reserve
- The site is rich in biodiversity with a high number of protected species on site

Environmental Health

- Increased pollution
- Pylons on site therefore health and safety concerns
- Land instability

Other Issues

- Other brownfield sites available for development
- Drainage issues
- Schools are at full capacity
- Local services and amenities unable to sustain extra population
- Loss of a popular recreational facility and open space
- Impact on Brecon Beacons National Trust
- Questions the need for additional housing
- Disruption to utilities

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.7.12 states that in green wedges there is a presumption against development that is inappropriate in relation to the purposes of the designation.

Para. 4.8.1 states the preference for reuse of previously developed land over

development of greenfield sites.

Para. 5.3.11 states that non statutory designations such as SINC can add value to the planning process, but should not unduly restrict acceptable development.

Para. 9.3.1 states that new housing development should avoid the coalescence of settlements.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may acceptable.

Council Analysis

- **The site should be included in the Plan (C2J)**

The site has not been previously assessed as a candidate site by the Council.

The site and the supporting evidence have been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The site is a large piece of greenfield land and represents an illogical extension to the existing settlement. The development would result in the loss of a prominent, well-used area.

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

Although one of the aims of the Plan is to increase the number of residents in Blaenau Gwent living within 400m of their nearest green space, it is considered that this is not a problem in the Beaufort area. The results of the Natural Green Space Assessment indicate that there is adequate access to natural green space. within the Beaufort area..

It is also considered that Policy SB1 Settlement Boundaries and DM14 – Protection of Open Space provide adequate protection for areas of open space that do not have any formal allocation within the Plan. The policies seek to protect land that lies outside the settlement boundary for its recreation and tourism potential use. In addition, policy SP9 – Active and Healthy Communities supports leisure activities in the countryside. In line with national guidance a specific recreational allocation has not been afforded to this site as the site is given sufficient protection by policies SB1 and DM14.

The site is designated as a SINC. All sites of Importance for Nature Conservation were assessed and identified in accordance with a document

produced by several South Wales Local Authorities, namely 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. A copy of the authority's individual SINC site maps and corresponding site description and analysis are also available.

Part of the site is a green wedge designation. The site was considered suitable as a green wedge designation because it contributed to:

- Protection of vulnerable undeveloped land
- Protect urban form
- Protect open nature of the land
- Prevent coalescence between and within settlements

The Councils assessment of the site remains unchanged. Details of the Council's assessment of the green wedges can be found in the Environment Background Paper.

Highways View:

Vehicular access to the site would only be permitted directly off King Street. King Street is a classified road and is recognised as a Principal Route which is heavily trafficked. In order to facilitate access to any development proposal and also to serve other proposed sites within the immediate locality, a new junction would need to be constructed onto King Street in accordance with any recommendations of a Traffic Impact Assessment.

There are existing minor accesses serving the site via Big Lane which because of their substandard nature and that of Big Lane are not acceptable to be utilised as access to serve any further residential development.

Countryside and Landscape View:

The proposal is outside the defined and tangible settlement boundary. The site is high ground visible from the Heads of the Valleys corridor and Brecon Beacons National Park to the north; therefore there are high visual impact concerns. The development of this site would result in the loss of open countryside, which is accessible to local communities, and the impact on the Special Landscape Area would be high. Part of the green wedge falls within the settlement boundary.

Ecology View:

Development of this site is opposed, as the site is within Pond Group 1 SINC designation. The pond SINC has significant value for its habitat mosaic of ponds, streams, flushes and acid grassland. This contributes to the value of the wider area – Beaufort Hills LNR and SINC. The site is known to support a diverse range of species including amphibians, birds, invertebrates and mammals many of which are protected and priority species.

Environmental Health:

In terms of the proposed residential use, the site is greenfield land and therefore there is no risk of contamination. Further information is required on the proposed recreational use in terms of noise and light impacts.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives although no assessment has been undertaken against the LDP Strategy.

The Council has assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity, landscape and historic value. The site therefore performs poorly against the Sustainability Objectives when compared to the sites allocated for housing in the Plan.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 05**Alternative Site Name: Land off Parkhill Crescent****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
87D.221	Harmers Limited for Deri Holdings Limited (Harmers)	Unsound (CE2)	Objects to the exclusion of land off Parkhill Crescent as a housing allocation. The site will provide for a greater variety of residential sites whilst not intruding into the SINC area or the wider Special Landscape Area.

Representation – Alternative Site AS (N) 05

No	Name	Support /Object	Comment
10AS.719	Countryside Council for Wales (CCW)	Object	No Sustainability Appraisal has been supplied in support of the allocation. The site does not comply with SEA regulations. The proposal would result in further expansion of the urban area and would be detrimental to the visual character and amenity of the area.
92AS.608	Gwent Wildlife Trust (GWT)	Comment	No objection to the development of this site however development should not impact the adjacent SINC.
95AS.1014	Mr L Thomas	Object	Objects to the site on the grounds that the road is not capable for extra traffic; power lines cross the site; land instability issues due to presence of mine shafts; horses grazing on site which attract school children; and the presence of protected species.
96AS.1013	Mrs J Thomas	Object	Objects to the site on the grounds of the presence of protected species; volume of traffic; highway safety concerns; pylon on site; and land instability issues due to mining works.

119AS.989	Mrs C Morgan	Object	Objects to the site because of a loss of greenfield land; nature trails affected; increased traffic and pollution; inadequate road infrastructure; schools at full capacity; health issues due to pylons and overhead lines; and shallow mine workings present.
123AS.981	Mr M C Taylor	Object	Objects to the site on the grounds of highway safety issues; traffic chaos during school times; increased pollution; loss of a very well used recreational area; and the presence of mine shafts.
124AS.979	Mr D Norris	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic pollution affecting quality of life; impact on local schools; impact on Brecon Beacons National Trust; impact on wildlife; and result in traffic congestion.
128AS.971	Mr C Jones	Object	Objects to the site on the grounds that the site has been previously mined; planning permission has been refused in the past; the site is greenfield land; traffic problems; increased pollution; and the impact on biodiversity and protected species.
129AS.970	Mr S Thompson	Object	Objects to the site on the grounds that the site has been previously mined; planning permission has been refused in the past; health risks due to overhead wires and pylons; the site is greenfield land; the road infrastructure is inadequate; traffic congestion; and highway safety concerns.
130AS.969	Mrs S J Thompson	Object	Objects to the site on the grounds that the site has been previously mined; planning permission has been refused in the past; health risks due to overhead wires and pylons; the

			site is a greenfield area; the road infrastructure is inadequate; traffic congestion and highway safety concerns.
133AS.966	Mrs S Jones	Object	Objects to the site on the grounds that the site has been previously mined; planning permission has been refused in the past; impact on protected species; traffic volume and pollution will impact on the Ebbw Fach trail; and traffic congestion is a problem in this area.
134AS.965	Mrs G Jones	Object	Objects to the site on the grounds that the site is a greenfield area; impact on biodiversity; local schools are at full capacity; parking issues at school; Bangor Road cannot sustain extra traffic; increased traffic and pollution; and underground workings and pylons on site.
135AS.963	Mr D A Jones	Object	Objects to the site on the grounds that there are underground workings and pylons on site; increased traffic and pollution; Bangor Rd cannot sustain additional traffic; greenfield site; impact on biodiversity; local school at full capacity; and parking facilities poor for school.
136AS.961	Mrs C Jones	Object	Objects to the site on the grounds that the site is greenfield land; congested roads at present and traffic will increase further; impact on public right of way; and well used recreational facility.
144AS.952	Mrs S White	Object	Objects to the site on the grounds that the road infrastructure is inadequate; impact on local school and health services; impact on biodiversity and SINC designation; quality of the landscape; health issues; and mining problems.

145AS.948	Mr M Jordan	Object	Objects to the site on the grounds that the development would result in high volume of traffic; high levels of congestion. The site is designated as a SINC with protected species. There are health risks of living near pylons and overhead wires. The land is unstable due to old mine workings on site.
146AS.947	Mr D White	Object	Objects to the site on the grounds that the road infrastructure is inadequate to accommodate further development; old mine workings on site; designated as a SINC; and the presence of protected species.
147AS.937	Mrs S Davies	Object	Objects to the site on the grounds of inadequate road infrastructure to accommodate additional traffic; the site qualifies as a SINC; old mine workings on the site; and planning permission has been refused in the past.
148AS.903	Mr I Lapham	Object	Objects to the site on the grounds that Bangor Road is congested and narrow; underground workings so risk of subsidence; SINC designation; no need for the housing with the hundreds being built on the Corus site; and the extra traffic generated.
152AS.784	Mrs L Stanley	Object	Objects to the site on the grounds that there are pylons on the site; old mine workings; planning permission refused in the past; and the road infrastructure is inadequate.
154AS.782	Mrs G Bunn	Object	Objects to the site on the grounds that access to the site from Bangor Road is inadequate; and the road infrastructure is not capable of accommodating additional traffic. New housing should be built around the A465 or close

			to the train station.
155AS.780	Mr S Bunn	Object	Objects to the site on the grounds that the roads around the site are extremely busy and congested; increased potential for air pollution; the site has been refused planning permission in the past.
157AS.767	Mr D Jones	Object	Object to the site on the grounds that the site is greenfield land; the Ebbw Fach trail would be affected by extra traffic and buildings; existing roads are busy; roads are narrow and wouldn't cope with the extra traffic; old mine workings and pylon on site.
173AS.884	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield and there are sufficient brownfield sites available; impact on biodiversity; loss of recreational facility; increase in traffic and pollution; parking problems; and loss of the green wedge.
174AS.686	Mr S Penny	Object	Objects to the site on the grounds that the site is greenfield land and there is sufficient brownfield land available for development; the site is of high biodiversity value; loss of recreation facility; traffic, parking and pollution issues; and the loss of the green wedge.
180AS.667	Mr T Plummer	Object	Objects to the site on the grounds that the present road layout is unsuitable; schools are at full capacity; previously deemed unsuitable due to old mine workings; close proximity to pylons and high voltage overhead cables; and impact on wildlife and flora.
194AS.628	Mr D E Morgan	Object	Objects to the site on the grounds of visual impact; traffic problems; highway safety concerns; the site is greenfield

			land of high biodiversity value with protected species; increased pollution; and local schools are at full capacity.
198AS.879	Miss B Trapnell	Object	Objects to the site on the grounds of the site is greenfield land that is well used for leisure; SINC designation; impact on protected species; increased traffic and pollution; quality of landscape; inadequate road infrastructure; school are at full capacity; and old mines present.
199AS.860	Mr J Poole	Object	Objects to the site on the grounds of the site is greenfield land that is well used for leisure; SINC designation; impact on protected species; increased traffic and pollution; quality of landscape; inadequate road infrastructure; school are at full capacity; and old mines present.
204AS.837	Mrs G Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; land instability and pressure on local amenities.
208AS.849	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
209AS.817	Mrs P E Morgan	Object	Objects to the site on the grounds that the site is greenfield land; visual impact on area; traffic problems will arise as the only approach road is passed OAP bungalows and school; and difficult to accommodate extra pupils.
211AS.810	Mrs D Cave	Object	Objects to the site on the

			grounds of the need to maintain the green wedge; detrimental visual impact; impact on protected species – bats; traffic and pollution will increase; and highway safety concerns.
212AS.809	Mr A Chappell	Object	Objects to the site on the grounds that access is inadequate; highway safety concerns; pylons on site leading to health implications; impact on protected species; and planning permission has been refused in the past.
219AS.801	Mrs N Takel	Object	Objects to the site on the grounds of health issues relating to pylons and overhead power lines on site; school traffic; Bangor Road is insufficient to accommodate additional traffic; schools are at full capacity.
221AS.795	Mrs A Shepherd	Object	Objects to the site on the grounds that the site is greenfield land; impact on the quality of the landscape; environmental and historical concerns; impact on biodiversity; need to maintain the green wedge; inadequate access; volume of traffic; traffic pollution; and pressure on services.
226AS.1060	Mrs K King	Object	Objects to the site on the grounds that the site is designated as a SINC; protected species present; greenfield land; forms part of the local landscape area; high visual impact; existing roads are congested; air pollution increase; and old mine workings on site.
227AS.1058	Mr B King	Object	Objects to the site on the grounds that the site is designated as a SINC; protected species present; greenfield land; forms part of the local landscape area; high

			visual impact; existing roads are congested; air pollution increase; and old mine workings on site.
235AS.725	Mrs J Thomas	Object	Objects to the site on the grounds that the site was an open cast mining site; land instability; impact on the habitat of wildlife; and loss of recreational facility
241AS.720	Miss L Greeves	Object	Objects to the site on the grounds of increased traffic; roads are inadequate; traffic pollution; impact on local schools; and old mine workings on site.
242AS.714	Mr J Evans	Object	Objects to the site on the grounds that planning has been refused in the past because of old mine workings; increased traffic pollution and impact on schools; inadequate road infrastructure; only one access to Park Hill Estate; and impact on wildlife and plants.
243AS.710	Mr C Greeves	Object	Objects to the site on the grounds of old mine workings on site; planning permission refused in the past; the impact on wildlife and plants; road infrastructure is inadequate; traffic pollution; and extra traffic impact on the schools.
244AS.697	Miss S Jones	Object	Objects to the site on the grounds that traffic congestion already a problem from Park Hill Crescent to Bangor Road; and planning permission refused in the past because of mine workings.
245AS.695	Mrs E Greeves	Object	Objects to the site on the grounds that there are old mining workings on site; impact on wildlife and plants; road infrastructure is inadequate; and traffic congestion along Bangor Road.
258AS.623	Mrs A Davies	Object	Objects to this site on the grounds that planning

			permission was refused because of land instability and undermining. An agreement (1985) was also made with SWALEC and BGCBC that no more houses would be built within this vicinity because of pylons.
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Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (Harmers):
 - The site will provide for a greater variety of residential sites whilst not intruding into the SINC area or the wider Special Landscape Area.

Desired Changes to LDP

- Inclusion of the land off Parkhill Crescent as a housing allocation in the Plan (Harmers)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

No evidence of compliance with the SA/SEA has been submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Planning Issues**
 - Planning permission has been refused in the past
 - Further expansion of the urban area would be detrimental to the visual

character and amenity of the area

Highway

- Increased traffic
- Highway safety concerns
- Inadequate road infrastructure
- Car parking concerns

Countryside and Landscape

- Greenfield land
- Falls within the green wedge
- Impact on the Ebbw Fach trail
- Quality of landscape

Ecology

- Impact on the adjacent SINC
- The site is rich in biodiversity with a high number of protected species on site

Environmental Health

- Pylons and overhead power lines cross the site therefore health and safety concerns
- Land instability due to mining works
- Increased pollution

Other Issues

- Other brownfield sites available for development
- Schools are at full capacity
- Local services and amenities unable to sustain extra population
- Loss of a popular recreational facility and open space
- Impact on Brecon Beacons National Trust
- Questions the need for additional housing
- Horses grazing on the site which attract school children

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 9.3.1 states that new housing development should avoid the coalescence of settlements.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may be acceptable.

Council Analysis

- **The site should be included in the Plan (Harmers)**

The site was previously assessed as part of a larger site and rejected under the Candidate Site Assessment Process (Candidate Site No. B11). The site was considered to be unsuitable for residential development on the grounds of the site qualifies as a SINC, the site is a greenfield site bordering onto open countryside and adjacent woodland with strong ecological connectivity; and there is uncertainty around the viability of the site due to ownership issues.

It is acknowledged that the representor submitted a reduced site boundary during the deposit Plan consultation which excludes the SINC designation.

It is also accepted that the land is owned by Deri Holdings Limited.

The new site boundary has been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

Designation of Blaenau Gwent's Special Landscape Areas was based on a robust and rigorous exercise carried out by Bronwen Thomas to an agreed methodology based on the Land Map assessment for the area. This site falls within the Mulfran Special Landscape Area and is distinctive as pasture land that falls between settlement and upland heath land. A copy of the Proposals for Designation of Special Landscape Areas in Blaenau Gwent is available.

Highways View:

The Highway Authority has completed both a site inspection and a Highway Assessment Proforma for this site. It is the opinion of the Highway Authority that access would only be permitted via Parkhill Crescent subject to substantial highway upgrading works.

Ecology View:

The Field 1 to the north of the site contains short horse grazed semi improved poor pasture with an area of standing water and associated marshy vegetation and scattered hawthorn in the west. Field 2 to the south contains sheds and barns. Further surveys required include at least extended phase 1 habitat survey and possibly further species surveys. Mitigation plans should be included to protect and enhance any features on site as well as the adjacent SINC. The area to the north west and south east has greater value for biodiversity and as such has been identified as a SINC.

Countryside View:

The proposal is for development outside the defensible settlement boundary that is highly visible from a large number of receptors across the Upper Ebbw Fawr area. Objection on visual impact grounds maintained.

Comment on SA:

No SA information has been submitted to support the allocation of the site.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 06
Alternative Site Name: Land at Ystrad Deri

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
23D.8	Tredegar Town Council (TTC)		This site should be included in the Plan as a housing allocation as it is suitable for low rise housing (single storey) but need to maintain right of way.

Representation – Alternative Site AS (N) 06

No	Name	Support /Object	Comment
34AS.975	Mrs P Davies	Object	Objects to the inclusion of this site on the grounds that the two sites merge into an enormous site with no green area.
139AS.973	Mrs C Steed	Object	Objects to the inclusion of this site on the grounds that the development will reduce the value of existing properties, the land is far too narrow for building on and it is well used by the community for leisure activities.
162AS.954	Mrs D M Brace	Object	Objects to the inclusion of this site on the grounds that the site was originally earmarked for a road and parking and questions why this has changed, the value of existing properties will depreciate, quality of views will be obscured and presence of colony of bats on site and rare plants.
196AS.650	Blaenau Gwent County Borough Council (BGCBC)	Object	Objects to the inclusion of the site on the grounds that the site covers part of the line of the 1796 Trefil Railroad from Trefil Quarries to Sirhowy Ironworks and forms part of the Fothergill Trail, a published heritage trail.
208AS.850	Mrs Y Walker	Object	Objects to housing as far too many proposed and the local infrastructure cannot cope with all the extra number of houses.

234AS.912	Mr P McGrath	Object	Objects to the inclusion of this site on the grounds that Ystrad Deri is a rough area and building houses here would make the only decent bit of the estate rough. There is a culvert on this land and a bat population, which would be disturbed. Site is too close to other properties.
237AS.911	Mrs J Evans	Object	Objects to the inclusion of this site on the grounds that it will be directly in front of home and will be an invasion of privacy, as they will be looking onto one another. Concerned about the type of occupants and also loss of open space as this is the only bit of land where children play safely.
239AS.910	Ms H. Canilt	Object	Objects to the inclusion of this site on the grounds of: having a row of houses on this site is inconsiderate for current tenants. Loss of privacy due to new houses. There are more roomy areas to put houses without tenants being pinned in. Views will be lost and bats nesting in area.
247AS.909	Mr R Raney	Object	Object to houses being built on this site we have a lot of trouble from teenagers and children throwing items at our home, a problem that has been going on for 2yrs, more housing would add to the problem.

Summary of Key Issues at Deposit Stage

The key issue identified in the representation is as follows:

- The site is suitable for low rise housing and should be included in the Plan (TTC)

Desired Changes to LDP

- Inclusion of the land at Ystrad Deri as a housing allocation in the Plan (TTC)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA/SEA/HRA

No Evidence was submitted

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:

Countryside and Landscape

- Loss of open space (Mrs P Davies) (Mrs J Evans)
- Heritage trail threatened (BGCBC)

Ecology

- Threat to bats and rare species (Mrs D M Brace) (Mr P McGrath) (Ms H Canilt)

Other Issues

- Devalue houses (Mrs C Steed) (Mrs D M Brace)
- Land is too narrow for building (Mrs C Steed) (Ms H Canilt)
- Loss of leisure activity i.e. walking (Mrs C Steed) (Mrs J Evans)
- Loss of views (Mrs D M Brace) (Ms H Canilt)
- Local infrastructure unable to cope (Mrs Y Walker)
- Culvert on Site (Mr P McGrath)
- Privacy issue (Mrs J Evans) (Ms H Canilt)
- Site was originally earmarked for a road and car parking (Mrs D M Brace)
- Loss of amenity (Mr P McGrath) (Ms H Canilt)
- Concerned about who would occupy the houses (Mrs J Evans)
- Anti-social behaviour (Mr P McGrath) (Mr r Raney)

Desired Changes to LDP

- No change to the Plan (Mrs P Davies) (Mrs C Steed) (Mrs D M Brace) (BGCBC) (Mrs Y Walker) (Mr P McGrath) (Mrs J Evans) (Ms H Canilt) (Mr R Raney)

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 11.1.10 states that informal open spaces with significant amenity value should be protected from development, particularly in urban areas

Council Analysis

- **The site is suitable for low rise housing and should be included in the Plan (TTC)**

The site has not been previously assessed as a candidate site by the Council.

The site has been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The site lies within the settlement boundary and consists of open space in the heart of a built up residential area. It is used for recreation purposes by locals and as a route to a nearby employment area. This thin strip of land acts as a green link and ecological corridor. Any development on this site would result in the loss of valuable open space and have a detrimental effect on the Green Infrastructure. It should be noted that the open space assessment has identified a shortfall of informal play space in the Sirhowy ward of 1.07 ha. (see Leisure Background Paper). This site will be protected through Policy DM14 'Protection of Open Space' and Policy DM16 'Protection and Enhancement of the Green Infrastructure'.

It should also be noted that a Public Right of Way (a restricted byway) crosses the site.

Highways View:

Access to the site is difficult due to numerous constraints. It is difficult to envisage how a residential development could be accommodated within this narrow strip of land as it stands, taking into account that an access road would need to be constructed to adoptable standards linking in with the existing road junction of Chartist Way/Ysgurbowen.

Countryside and Landscape View:

Site offers access to natural green open space for local community and development would have an adverse impact on provision of access to natural green open space baseline data.

Site is valued by local community for walking and as a green route to employment land to the north, and woodland areas for leisure and recreation.

Ecology View:

The site forms a linear corridor of grassland between the residential areas. It is semi improved grassland with indicators of neutral grassland although the area closest to the road is more improved. It provides important connectivity to other areas of semi natural habitat including Bryn Serth and the grassland surrounding it and also links up to the stream. It is likely to provide an important habitat for a range of priority and protected species including mammals (bats), reptiles, birds and invertebrates.

Environmental Health View:

Site has previous industrial use and a risk assessment report should be provided to determine suitability.

Comment on SA:

No SA information has been submitted to support the allocation of the site.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 07**Alternative Site Name: Access Road at Tafarnaubach Industrial Estate****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
16D.74	Councillor John Morgan on behalf of Tredegar Town Council (Cllr J Morgan)	Unsound	A direct access to be developed to the Heads of the Valleys road from the Tafarnaubach Industrial Estate.
23D.73	Tredegar Town Council (TTC)	Unsound	Consideration of a new access to Tafarnaubach Industrial Estate from A465 Heads of the Valleys Road.
81D.70	Mr N Smith MP		Requests a new slip road be investigated to serve the proposed Parc Bryn Bach Hotel Site and the Tafarnaubach Industrial Estate.

Representation – Alternative Site AS (N) 07

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- New access road to Tafarnaubach Industrial Estate (Cllr J Morgan) (TTC) (Mr N Smith MP)

Desired Changes to LDP

- New access road to Tafarnaubach Industrial Estate (Cllr J Morgan) (TTC) (Mr N Smith MP)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA/SEA/HRA

No evidence submitted.

Compliance with LDP Strategy

No evidence of compliance with LDP objectives submitted.

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Paragraph 8.5.2 states that 'blight should be kept to a minimum by including in development plans only firm schemes on which work will commence within the plan period'.

Council Analysis

- **New access road to Tafarnaubach Industrial Estate** (Cllr J Morgan) (TTC) (Mr N Smith MP)

Although the Council are generally supportive of the proposal there are currently no resources identified nor is the scheme identified in the SEWTA Regional Transport Plan. PPW Edition 4 at paragraph 8.5.2 makes it clear that '*Blight should be kept to a minimum by including in development plans only firm schemes on which work will commence within the plan period*'. As no firm scheme has been identified it is suggested that no change is made to the Plan.

Conclusion

The site is considered unsuitable for allocation in the LDP

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 08
Alternative Site Name: Former Gasworks, Park Place

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
16D.130	Councillor John Morgan on behalf of Tredegar Town Council (Cllr J Morgan)	Unsound	The Former Gasworks site in Tredegar should be included in the Plan as a car park allocation.

Representation – Alternative Site AS (N) 08

No	Name	Support /Object	Comment
150AS.962	Mr R Humphreys	Support	Support car park on the lower northern level only, as car parking in the area is a growing problem and to protect our privacy. Retain mature trees area and current grassed area as a wildlife habitat and local amenity.
228AS.915	Mr R Brain	Support	There are a number of venues in the area situated on double yellow lines so a car park is much needed. A playground is also much needed as the nearest is a mile away so site could be split between both.
232.AS.913	Mr K Reardon	Object	Litter is a major problem in the area, the proposal would encourage an increase in litter dropping. Site would encourage boy racers to the area causing noise and pollution and adding to litter problem. Site has benefited wildlife in the area.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- Identify Gasworks site, Park Place for Car Park (Cllr J Morgan)

Desired Changes to LDP

- Identify Gasworks site, Park Place for Car Park (Cllr J Morgan)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

No evidence submitted.

Compliance with LDP Strategy

No evidence of compatibility with LDP objectives submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support for car park on part of site (Mr R Humphreys) (Mr R Brain)
- Objection of use of land for Car Park on grounds of (Mr K Reardon):
 - Litter
 - Anti social behaviour
 - Noise and pollution
 - Loss of wildlife

Desired Changes to LDP

- Identify part of site for car park (Mr R Humphreys) (Mr R Brain)
- No change to the LDP in respect of this proposal (Mr K Reardon)

COUNCIL RESPONSE

Council Analysis

The site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site No.A.4). The site was considered to be unsuitable for mixed use due to questions over whether the site is developable due to the cost of the remediation works. No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

The site has been granted outline planning permission for housing (2009/0283 and 2009/0284) since the baseline of the Plan. It is understood that the owners of the site are planning to remediate the site at their own cost prior to disposing of the site for housing. The site would therefore be considered as a windfall site.

- **Identify Gasworks site Park Place for Car Park** (Cllr J Morgan)

The site already has outline planning permission for housing. If the Council were to allocate the land for a car park it would be required to purchase the land at residential value from the landowners. The Council does not have the funds available to purchase the site.

The issue of car parking in the area has been raised with the highways division.

Support for car park on part of site (Mr R Humphreys) (Mr R Brain)

The proposal to provide parking on part of the site may be considered during the preparation of the detailed plans for the site. This will depend on the developer of the site and their approach to consultation on their proposed scheme for the area.

Objection of use of land for Car Park (Mr K Reardon)

Objection noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 09
Alternative Site Name: Tredegar Comprehensive School

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
76.D175	Cllr K Hayden		The representation seeks an alternative site for Georgetown Primary School and suggests the school be relocated to the Tredegar Comprehensive School site.

Representation – Alternative Site AS (N) 09

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issue identified in the representation is as follows:

- Georgetown Primary School should be relocated to the Tredegar Comprehensive School site (Cllr K Hayden)

Desired Changes to LDP

- Identification of a new primary school on the Tredegar Comprehensive School site to replace Georgetown Primary School (Cllr K Hayden)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

COUNCIL RESPONSE

Council Analysis

- **Georgetown Primary School should be relocated to the Tredegar Comprehensive School site (Cllr K Hayden)**

It is acknowledged that there is an issue with school numbers in the Tredegar catchment area. The Education department are currently in the process of preparing a School Organisation Plan which will look to address this issue. The Regeneration division will work with education to identify future school sites.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 10
Alternative Site Name: Ashvale Industrial Estate

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
76.D176	Cllr K Hayden		The representation seeks an alternative site for Brynbach and St Joseph Primary School and suggests the schools be relocated to Ashvale Industrial Estate.

Representation – Alternative Site AS (N) 10

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issue identified in the representation is as follows:

- Brynbach and St Joseph Primary School should be relocated to Ashvale Industrial Estate (Cllr K Hayden)

Desired Changes to LDP

- Identification of a new primary school on land at Ashvale Industrial Estate to replace Brynbach and St. Joseph Primary Schools (Cllr K Hayden)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

COUNCIL RESPONSE

Council Analysis

- **Brynbach and St Joseph Primary School should be relocated to Ashvale Industrial Estate** (Cllr K Hayden)

It is acknowledged that there is an issue with school numbers in the Tredegar catchment area. The Education department are currently in the process of preparing a School Organisation Plan which will look to address this issue. The Regeneration Division will work with Education and Leisure to identify relevant opportunities.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 11
Alternative Site Name: Nine Arches Viaduct

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
55D.24	Mr H D Westacott		The site should be developed as a park to provide the many elderly and young mothers with children with a much needed short walk to a pleasant environment.

Representation – Alternative Site AS (N) 11

No	Name	Support /Object	Comment
10AS.721	Countryside Council for Wales (CCW)	Object	CCW objects to the site because no Sustainability Appraisal has been submitted and this does not comply with SEA Regulations.
18AS.781	Environment Agency (EA)	Comment	No adverse comments re allocation of the site but FCA required as the site area lies partially within zone C2 and is also within 1% and 0.1% annual probability fluvial flood outlines of the Sirhowy River.
92AS.609	Gwent Wildlife Trust (GWT)	Object	Objects to the development of part of the site which is designated as a SINC, not the development of the southern field.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The site should be included in the Plan as a tourism and leisure allocation (Mr H D Westacott)

Desired Changes to LDP

- Inclusion of the land at Nine Arches Viaduct as a tourism and leisure allocation in the Plan (Mr H D Westacott)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

SA/SEA/HRA

No Evidence was submitted

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- **Objects to the inclusion of this site for the following reasons:**
 - No Sustainability Appraisal has been submitted (CCW)
 - FCA required (EA)
 - Part of the site is designated as a SINC but no objection to the development of the southern field (GWT)

Desired Changes to LDP

- No change to the Plan (CCW) (EA) (GWT)

COUNCIL RESPONSE

Council Analysis

- **The site should be included in the Plan as a tourism and leisure allocation** (Mr H D Westacott)

The site consists of open space and contains a grade II Listed Building i.e. Nine-Arch Viaduct. Any development would need to be in keeping with this building as well as respect its environmental designations as it lies within a Special Landscape and the northern part of the site is designated as a SINC.

The representor proposes that the site is developed as a park and allocated

for tourism and leisure in the LDP. Sites should only be allocated in LDPs where there is certainty in terms of deliverability. In this case there is no evidence of that as the representor has not provided any supporting documentation such as sustainability appraisal, land ownership or potential sources of funding for the project. There are no plans at present for any regeneration project work to be carried out at the site. In fact, part of the site is required (see T6 Regeneration Led Highway Improvements) to be used as spoil heaps in connection with the dualling of the A465 Heads of the Valleys Road (Tredegar to Brynmawr). This proposed allocation is therefore not justified.

- **Objects to the inclusion of this site** (CCW) (EA) (GWT)
All comments received during the alternative site consultation are noted.

Conclusion

It is not considered that there is a realistic prospect of tourism and leisure being provided on the land in question during the plan period.

The Council considers that the site is inappropriate for allocation as tourism and leisure.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 12
Alternative Site Name: Extension to Sirhowy Cycle Network Route

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
62D.195	Caerphilly County Borough Council (CCBC)	Sound	TR1.4 Extension to the Sirhowy Valley Cycle Route is not continued within Blaenau Gwent, whilst this is not considered to be an issue that harms the interests of Caerphilly CBC it is brought to your attention as a potential opportunity.

Representation – Alternative Site AS (N) 12

No	Name	Support /Object	Comment
132AS.753	Davies Meade Property Consultants (DM)	Object	Objects to the proposed cycle route on the following grounds: <ul style="list-style-type: none"> • damage to ecology • loss of privacy • loss of trees • visual impact • alternative route available
10AS.726	Countryside Council for Wales (CCW)	Comment	Survey needed to confirm whether the site has any protected or BAP habitat or species present, if species found appropriate mitigation measures will be required.
240AS.1071	K Verity	Support	Supports the proposed cycle track extension on grounds that it would enable the people at Pochin Houses access to a cycle path without having to drive.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- Extension of cycle route from Caerphilly CBC into Blaenau Gwent (CCBC)

Desired Changes to LDP

- Change not clearly stated (CCBC)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

No evidence provided.

Compliance with LDP Strategy

No evidence of compliance with LDP objectives identified.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objection to the proposed cycle route (DM)
- Survey required (CCW)
- Support for proposed cycle track (K Verity)

Desired Changes to LDP

- Change not clearly stated (DM) (CCW) (K Verity)

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Paragraph 8.2.2 states that local authorities should encourage the implementation of specific measures to develop safe cycling, including new or improved routes, and secure parking and changing facilities in major developments and at transport interchanges.

Council Analysis

- **Extension of cycle route from Caerphilly CBC into Blaenau Gwent (CCBC)**

Agree. It is proposed to link two existing cycle routes between Bedwellty Pits and Hollybush (Caerphilly CBC). The alignment for this route identified in the Plan (T1.7) was considered, at the time, to be a possible alternative route to that identified as AS (N)12. However, further investigations by Caerphilly CBC have shown that the only acceptable off road route is that identified by AS (N)12.

It is recommended that the alignment of T1.7 on the proposals maps is amended to reflect that identified in AS (N) 12 on Map 11.

- **Objection to the proposed cycle route (DM)**

Disagree.

- **Damage to ecology**

A survey has been undertaken to identify the best route for this link. The alternative route was found to have a far greater impact on ecology than this route. The impact on ecology along this route will be dealt with in line with policy DM15.

- **Loss of privacy**

The investigation undertaken by Caerphilly CBC identifies that this is the only acceptable off road route. The impact on privacy can be dealt with in the design of the scheme. However, it should be noted that the route at the point in question is along a former railway track which is in the ownership of the Council.

- **Loss of trees**

An investigation has been undertaken to identify the best route for this link. The impact on trees is less on this route than the alternatives considered. Policy DM17 ensures that there would be no unacceptable harm to trees.

- **Visual impact**

The visual impact will be kept to a minimum in line with policy requirements of DM2.

- **Alternative route available**

The alternative option identified in the LDP proved to be unacceptable on ecological and design standard grounds. The route would not enable the cycle track to comply with DDA requirements.

- **Survey required (CCW)**

Agree. A survey will be undertaken in accordance with the policy requirements of the Plan.

- **Support for proposed cycle track (K Verity)**

Support welcomed.

Conclusion

The route of T1.7 on the proposals maps be amended to that identified as AS (N) 12.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Proposals Map be changed to include an amended alignment for T1.7.

The amendment to the route is shown on Map 11, attached at appendix 3.

Reason for Recommendation

The proposed change is not substantive but would reflect the latest position in terms of the development of the cycle network. Importantly the change would not affect the soundness of the plan.

Alternative Site Ref: AS (N) 13

Alternative Site Name: Land at Brynmawr – Site 1

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
17D.214	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	This site should be included in the Plan as a housing allocation as it's a natural extension of the existing residential area with access to the existing highway network and established local community services.

Representation – Alternative Site AS (N) 13

No	Name	Support /Object	Comment
10AS.1055	Countryside Council for Wales (CCW)	Object	CCW raises concerns with the size and location of the allocation which would result in significant encroachment into upland common/open countryside. The site is identified as SLA. The development would be detrimental to the character and amenity of the area. Site includes a SINC which the LDP seeks to protect. Questions the need for further housing allocations.
18AS.788	Environment Agency Wales (EA)	Comment	The proposed site is located in a former mining area and on an historic landfill. There is significant potential for historic contamination to exist on the site. The proposed site is also located within the North Crop Source Protection Zone 1 (SPZ1).
92AS.610	Gwent Wildlife Trust (GWT)	Object	Object to the development of this site which is a mosaic shrub, marshy and acid grassland. The site potentially qualifies as an Open Mosaic Habitat on previously developed land under the

			UKBAP and contains a SINC.
156AS.773	Mr A Walls	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; Beaufort woodlands is a popular recreation facility; beautiful landscape; impact on biodiversity; increased traffic and pollution; inadequate road infrastructure; and the impact on the local school.
158AS.760	Mrs D Owen	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; impact on areas of natural beauty and wildlife; increase traffic and pollution; highway safety concerns; inadequate road infrastructure; and the impact on the local school.
173AS.885	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield and there are sufficient brownfield sites available; impact on biodiversity; loss of recreational facility; increase in traffic and pollution; parking problems; and loss of the green wedge.
174AS.687	Mr S Penny	Object	Objects to the site on the grounds that the site is greenfield land and there is sufficient brownfield land available for development; the site is high biodiversity value; loss of recreation facility; traffic, parking and pollution issues; and the loss of the green wedge.
193AS.646	Brynmawr Town Council	Comment	Development of this site would require a major overall of the access/egress routes which are presently inadequate before further housing development were to be permitted.
196AS.652	BGCBC –	Comment	This area retains important

	Education and Leisure		industrial archaeology associated with Nantyglo and Beaufort Ironworks. The site is identified as a significant element of a wider historic landscape by CADW/GGAT as part of the South East Wales Industrial Ironworks Landscapes Project 2009.
198AS.872	Miss B Trapnell	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
199AS.863	Mr J Poole	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
208AS.663	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
224AS.1063	Mr F R Lynch	Object	Objects to the site on the grounds that the site is greenfield land; need to retain the green wedge; visual impact; impact on biodiversity; traffic issues; impact on landscape quality and historical landscape; and impact on local schools.
249AS.1027	Mr A Davies	Comment	Comments that none of the existing roads can accommodate the proposal and to increase traffic flow on these roads would be

			dangerous. New access entry points could be created from Little Lane or off the Heads of the Valleys by the highest point.
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Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (C2J):
 - Natural extension of the existing residential area
 - Good access to the existing highway network and established community services

Desired Changes to LDP

- Inclusion of the land at Brynmawr as a housing allocation in the Plan (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

Evidence was submitted in part.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Highways**
 - Increased traffic
 - Highway safety concerns
 - Access to the school is narrow
 - Car parking concerns
 - Access concerns
 - Countryside and Landscape**

- Significant encroachment into upland common/open countryside
- The site is identified as SLA
- Falls within the green wedge
- Greenfield land
- Impact on landscape quality
- Identified as a significant element of a wider historic landscape

Ecology

- Site includes a SINC
- The site potentially qualifies as an Open Mosaic Habitat
- Impact on biodiversity

Environmental Health

- Former mining area and historic landfill
- Significant potential for historic contamination
- Located within the North Crop Source Protection Zone 1
- Increased pollution

Other Issues

- Questions the need for further housing allocations
- Beaufort Woodlands is a popular recreational facility
- Impact on local schools
- Sufficient brownfield land available
- Impact on local infrastructure

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 5.3.11 states that non statutory designations such as SINC can add value to the planning process, but should not unduly restrict acceptable development.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may be acceptable.

Council Analysis

- **The site should be included in the Plan (C2J)**

The site has not been previously assessed as a candidate site by the Council.

The site and the supporting evidence have been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The site is a large area of steep greenfield land. The site represents an illogical extension to the existing settlement. The development would result in an isolated form of development in a prominent, well-used area.

A Public Right of Way crosses the site and there is a pylon located on the site.

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

The site is designated as a SINC. All sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. A copy of the authority's individual SINC site maps and corresponding site description and analysis are also available.

Highways View:

Access cannot be provided due to the severity of constraints. The only means of accessing the site is via the adopted roadway named Clydach Street. This roadway and the surrounding local highway network has been identified by the Highway Authority as being substandard in design with extensive on street parking problems and traffic congestion at peak times. The allocation of this site would exacerbate existing highway network problems by adding significant increases in traffic movements in an area already identified as being at capacity.

Countryside and Landscape View:

The proposal is outside the defined and tangible settlement boundary. The site is high ground visible from the Heads of the Valleys corridor and Brecon Beacons National Park to the north; therefore there are high visual impact concerns. The development of this site would result in the loss of open countryside, which is accessible to local communities, and the impact on the Special Landscape Area would be high.

Ecology View:

Development of this site is opposed, Brynmawr Pond SINC is within the site and Bryn Farm SINC is adjacent. The site contains a mosaic of acid/marshy grassland with a pond. The site and the habitat it supports forms an important part of the overall value of the area, particularly in supporting the network of ponds. It is likely that the site supports a variety of protected and priority

species including bats, breeding birds, reptiles, amphibians and invertebrates.

Environmental Health View:

There is potential for contaminated land and therefore further information is required in the form of a ground investigation and risk assessment.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives although no assessment has been undertaken against the LDP Strategy.

The Council has assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity, landscape and historic value. The site therefore performs poorly against the Sustainability Objectives when compared to the sites allocated for housing in the Plan.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 14**Alternative Site Name: Land at Beaufort Hill – Site 2****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
17D.169	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	This site should be included in the Plan as a housing allocation as it's a natural extension of the existing residential area with access to the existing highway network and established local community services.

Representation – Alternative Site AS (N) 14

No	Name	Support /Object	Comment
10AS.1057	Countryside Council for Wales (CCW)	Object	Development at this location would erode the openness of the area between Brynmawr and Beaufort and undermine the purpose of the green wedge..
92AS.611	Gwent Wildlife Trust (GWT)	Object	Objects to the development of this site which is designated as it's a Candidate Local Nature Reserve.
94AS.1017	Councillor L Elias	Object	Objects to the site on the grounds that the site is adjacent to Parc Nant y Waun nature reserve; and housing would impinge on the quality of the provision and biodiversity benefits.
143AS.959	Mrs B Williams	Object	Objects to the site on the grounds that the increased population will increase traffic and associated noise and pollution, making life difficult and dangerous for residents; and the loss of the green wedge between Beaufort and Brynmawr.
144AS.955	Mrs S White	Object	Objects to the site on the grounds that the site is a well used greenfield site; loss of the green wedge; impact on

			biodiversity and the quality of the landscape; impact on Ebbw Fach trail; increased volume and pollution from traffic.
146AS.943	Mr D White	Object	Objects to the site on the grounds of the site's proximity to the Ebbw Fach trail (eastern edge); borders LNR (southern edge); increased traffic and pollution levels; and the loss of the green wedge.
147AS.931	Mrs S Davies	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic and pollution; and highway safety with a number of accidents occurring.
149AS.901	Mr V Williams	Object	Objects to the site on the grounds of the increase in traffic, noise and pollution; reduce the quality of life for residents; and development of this site would merge and destroy the distinct identities of the communities.
153AS.783	Mr W Stanley	Object	Objects to the site on the grounds of the impact on the wildlife and flora; impact on Ebbw Fach trail, Beaufort ponds and Parc Nant y Waun; the schools are at full capacity; and highway safety issues.
156AS.771	Mr A Walls	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; Beaufort woodlands is a popular recreation facility; beautiful landscape; impact on biodiversity; increased traffic and pollution; inadequate road infrastructure; and the impact on the local school.
158AS.757	Mrs D Owen	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; impact on areas of natural beauty and wildlife; increase traffic and pollution;

			highway safety concerns; inadequate road infrastructure; and the impact on the local school.
173AS.886	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield and there are sufficient brownfield sites available; impact on biodiversity; loss of recreational facility; increase in traffic and pollution; parking problems; and loss of the green wedge.
174AS.689	Mr S Penny	Object	Objects to the site on the grounds that the site is greenfield land and there is sufficient brownfield land available for development; the site is high biodiversity value; loss of recreation facility; traffic, parking and pollution issues; and the loss of the green wedge.
184AS.664	Mrs S Llewelyn	Object	Objects to the site on the grounds that the site is greenfield, mountainside, moorland and an area of natural & historic beauty; the green wedge should be retained; increased traffic; and lack of infrastructure and facilities to support the development.
185AS.659	D Llewelyn	Object	Objects to the site on the grounds that additional housing would destroy the existing social cohesion enjoyed; destroy the natural habitats; create additional traffic to an already congested area; and further development would encroach on the green belt which is marginal at present.
193AS.642	Brynmawr Town Council	Object	Objects to the site on grounds that the green wedge should be maintained to prevent the coalescence between the Beaufort and Brynmawr

			settlements.
194AS.631	Mr D E Morgan	Object	Objects to this site on the grounds that the development would result in the loss of the green wedge and quality landscape; impact on biodiversity and protected species; increased traffic and pollution; and the local amenities will not cope with extra housing.
198AS.873	Miss B Trapnell	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
199AS.866	Mr J Poole	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
200AS.1037	Miss A Williams	Object	Objects to the site on the grounds that the development would result in increased traffic; parking issues; highway safety issues; increased pollution; pressure on services; impact on biodiversity; loss of historic identity; loss of green wedge; drainage issues; and land instability.
201AS.842	Miss A Williams	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; inadequate road infrastructure; increased air, noise pollution; car parking

			concerns; impact on biodiversity; pressure on local amenities. The site has poor public transport links and the land is unstable.
202AS.1038	Miss K Williams	Object	Objects to the site on the grounds of: increased traffic and pollution; impact on the natural beauty and wildlife; loss of place identity if green wedge is lost; pressure on local school and services; and public transport would need to be increased.
203AS.841	Mr R Rackham	Object	Objects to the site on the grounds that local services are unable to sustain extra population; need to maintain the green wedge; impact on wildlife, ponds, plants and trees; and extra traffic will cause air and noise pollution, which will effect biodiversity and highway safety.
204AS.836	Mrs G Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
205AS.832	Mr T Williams	Object	Objects to the site on the grounds of inadequate road infrastructure; highway safety concerns; impact on plant and wildlife; increased air pollution; schools at full capacity; need to maintain green wedge; and pressure on local amenities.
208AS.851	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
209AS.820	Mrs P E Morgan	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; and local services will not cope with the increase in

			population. The development would impact on biodiversity and protected species; increase traffic and pollution levels.
215AS.807	Mr D Shepherd	Object	Objects to the site on the grounds of the impact on biodiversity; the increase in traffic; schools are at full capacity; need to maintain the green wedge; and the quality of the landscape and proximity to LNR and Parc Nant y Waun.
224AS.1066	Mr F R Lynch	Object	Objects to the site on the grounds of the site is greenfield land; need to retain the green wedge; visual impact; impact on biodiversity; traffic issues; impact on landscape quality and historical landscape; and impact on local schools.
238AS.1039	Mr K James	Object	Objects to the site on the grounds that there are number of sites in the area with planning permission; at present traffic and parking is bad, the development would exacerbate the problem; and the need to retain the green wedge.
244AS.696	Miss S Jones	Object	Objects to the site on the grounds of impact on the quality of the landscape; proximity to Parc Nant y Waun; impact on flora and fauna; greenfield site; traffic; road infrastructure unsuitable; and loss of a recreational facility.
248AS.693	Mrs A Anstee	Object	Objects to the site on the grounds of increased traffic flow; parking issues; and preservation of the green belt between Beaufort and Brynmawr.
253AS.625	Mr L Williams	Object	Objects to this site on the grounds of the site is located in a green wedge, which if built

			would merge Ebbw Vale and Brynmawr; the development of this site would be disruptive and unsightly; and increased traffic congestion.
259AS.603	Mr J Humphrys	Object	Objects to the inclusion of this site on the grounds of: the natural habitat within this area will be destroyed; and during development the dust and noise that will occur on the site will have a detrimental effect on the area.
260AS.602	Mrs B James	Object	Objects to the inclusion of this site on the grounds of: the site falls within the green wedge which prevents the coalescence of Beaufort and Brynmawr; car parking concerns; schools are at full capacity in the area; and the site is lovely greenfield land.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (C2J):
 - Natural extension of the existing residential area
 - Good access to the existing highway network and established community services

Desired Changes to LDP

- Inclusion of the land at Beaufort Hill as a housing allocation in the Plan (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

Evidence was submitted in part.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Highways**
 - Increased traffic
 - Highway safety concerns
 - Inadequate road infrastructure
 - Car parking concerns
 - Access to the existing school is narrow
 - Public transport would need to be increased
 - Countryside and Landscape**
 - Adjacent to Parc Nant y Waun
 - Greenfield land
 - Falls within the green wedge
 - Quality of landscape
 - Impact on the Ebbw Fach trail
 - Visual impact
 - Ecology**
 - Site designated as a candidate LNR
 - The site is rich in biodiversity with a high number of protected species on site
 - Environmental Health**
 - Increased pollution and noise
 - Land instability
 - Other Issues**
 - Other brownfield sites available for development
 - Drainage issues
 - Schools are at full capacity
 - Local services and amenities unable to sustain extra population
 - Loss of a popular recreational facility and open space
 - Questions the need for additional housing
 - Disruption to utilities
 - The development would impact on the quality of life of the residents
 - Destroy the distinct identities of the Beaufort and Brynmawr communities

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.7.12 states that in green wedges there is a presumption against development that is inappropriate in relation to the purposes of the designation.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Para 5.3.1 states that statutorily designated sites make a vital contribution to protecting landscape and biodiversity and can also be important in providing opportunities for sustainable economic and social development.

Para. 9.3.1 states that new housing development should avoid the coalescence of settlements.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may be acceptable.

Council Analysis

- **The site should be included in the Plan (C2J)**

The site has not been previously assessed as a candidate site by the Council.

The site and the supporting evidence have been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The development of this site would result in the loss of the green wedge designation. Part of the site is a green wedge designation. The site was considered suitable as a green wedge designation because it contributed to:

- Protection of vulnerable undeveloped land
- Protect urban form
- Protect open nature of the land
- Prevent coalescence between and within settlements

The Council's assessment of the site remains unchanged. Details of the Council's assessment of the green wedges can be found in the Environment

Background Paper.

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

Highways View:

There is an existing access to the site via Twyncynghordy Road which is not suitable to be used as a means of vehicular access to serve a residential development. However, access to the site can be achieved via the adopted public highway serving South Bank.

Countryside and Landscape View:

Development is opposed at the site as the site falls within the green wedge. The green wedge should be protected to prevent the coalescence of the settlements of Brynmawr and Beaufort. The site complements Parc Nant y Waun community environmental site and the Ebbw Fach trail promoted route runs along the eastern boundary of the site.

Ecology View:

Development of this site is opposed, as the site is located within Parc Nant y Waun LNR. It is made up of neutral grassland and is part of the habitat mosaic of grassland, ponds and woodland across the area. The site is likely to support protected and priority species including breeding birds, reptiles, amphibians, bats and invertebrates.

Environmental Health View:

There is a risk of contamination on the site as a small part of the site was used as a railway and therefore may need a localised site investigation.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives although no assessment has been undertaken against the LDP Strategy.

The Council has assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity and landscape value. The site therefore performs poorly against the Sustainability Objectives when compared to the sites allocated for housing in the Plan.

LDP Strategy

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objection to the inclusion of the site**

All comments received during the alternative sites consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 15**Alternative Site Name: Land at Bryn Farm – Site 3****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
17D.168	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	This site should be included in the Plan as a housing allocation as it's a natural extension of the existing residential area with access to the existing highway network and established local community services.

Representation – Alternative Site AS (N) 15

No	Name	Support /Object	Comment
10AS.AS1059	Countryside Council for Wales (CCW)	Object	CCW objects to the site as the development would result in encroachment into the upland common north west of Beaufort. The site is identified as an SLA, includes a SINC and forms part of green wedge. Contrary to objectives and policies within the LDP.
18AS.799	Environment Agency Wales (EA)	Comment	There are numerous wetland habitats situated throughout the site. There are a number of waterbodies which are likely to be of high biodiversity value. The siting of any development in this area should be carefully planned and development should be minimised. Surveys and assessments need to be undertaken.
92AS.612	Gwent Wildlife Trust (GWT)	Object	Object to the development of this site which is designated as a SINC.
94AS.1015	Councillor L Elias	Object	Objects to the site on the grounds that there is a need to retain the green wedge between Beaufort and Brynmawr for biodiversity

			and defined borders; and previous planning enquiry deemed that the wedge be retained.
124AS.980	Mr D Norris	Object	Objects to the site on the grounds of increased traffic; pollution affecting the quality of life; impact on schools; impact on Brecon Beacons National Trust; impact on wildlife; and traffic congestion.
146AS.944	Mr D White	Object	Objects to the site on the grounds of the loss of green wedge; increase in the volume of traffic; increase in pollution levels; and questions the need for housing. The Big Lane development was granted permission for 10 dwellings only, due to highway issues.
147AS.933	Mrs S Davies	Object	Objects to the inclusion of this site on the grounds that the development would result in increased traffic and pollution; and highway safety with a number of accidents occurring.
156AS.774	Mr A Walls	Object	Objects to the inclusion of this site on the grounds that the development would result in the loss of green wedge; Beaufort woodlands is a popular recreation facility; beautiful landscape; impact on biodiversity; increased traffic and pollution; inadequate road infrastructure; and the impact on the local school.
158AS.766	Mrs D Owen	Object	Objects to the site on the grounds that the development would result in the loss of the green wedge; impact on areas of natural beauty and wildlife; increase traffic and pollution; highway safety concerns; inadequate road infrastructure; and the

			impact on the local school.
173AS.887	Mrs M Penny	Object	Object to the site on the grounds that the site is greenfield and there are sufficient brownfield sites available; impact on biodiversity; loss of recreational facility; increase in traffic and pollution; parking problems; and loss of the green wedge.
174AS.690	Mr S Penny	Object	Objects to the site on the grounds that the site is greenfield land and there is sufficient brownfield land available for development; the site is of high biodiversity value; loss of recreation facility; traffic, parking and pollution issues; and the loss of the green wedge.
193AS.639	Brynmawr Town Council	Object	Objects to this site on the grounds that the green wedge should be maintained to prevent the coalescence between the Beaufort and Brynmawr settlements
194AS.637	Mr D Morgan	Object	Objects to this site on the grounds that the development would result in the loss of the green wedge and quality landscape; impact on biodiversity and protected species; increased traffic and pollution; and the local amenities will not cope with extra housing.
196AS.653	BGCBC – Education and Leisure	Comment	This area retains important archaeology associated with the Nantyglo and Beaufort Ironworks. The site is Identified as a significant element of a wider historic landscape by CADW/GGAT.
198AS.874	Miss B Trapnell	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge

			between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
199AS.867	Mr J Poole	Object	Objects to the site on the grounds that the site is greenfield land which is well used by the community for leisure; and there is a need to maintain the green wedge between Beaufort and Brynmawr. The development would result in increased traffic and pollution; and impact on biodiversity.
208AS.852	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
209AS.823	Mrs P E Morgan	Object	Objects to the site on the grounds that there is a need to maintain the green wedge; and local services will not cope with the increase in population. The development would impact on biodiversity and protected species; increase traffic and pollution levels.
210AS.816	Mr B Chambers	Object	Objects to the site on the grounds of traffic to and from the site will create a major hazard because Big Lane not suitable for further traffic; there is a weight restriction on A4047; and the junction of Big Lane and A4047 will increase in traffic.
215AS.806	Mr D Shepherd	Object	Objects to the site on the grounds of the impact on biodiversity; the increase in traffic; schools are at full capacity; need to maintain the green wedge; and the quality of the landscape and proximity to LNR and Parc Nant y Waun.
221AS.796	Mrs A Shepherd	Object	Objects to the site on the

			grounds that the site is greenfield land; impact on the quality of the landscape; environmental and historical concerns; impact on biodiversity; need to maintain the green wedge; inadequate access; volume of traffic; traffic pollution; and pressure on services.
224AS.1068	Mr F R Lynch	Object	Objects to the site on the grounds of that the site is greenfield land; need to retain the green wedge; visual impact; impact on biodiversity; traffic issues; impact on landscape quality and historical landscape; and impact on local schools.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (C2J):
 - Natural extension of the existing residential area
 - Good access to the existing highway network and established community services

Desired Changes to LDP

- Inclusion of the land at Bryn Farm as a housing allocation in the Plan (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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SA/SEA/HRA

Evidence was submitted in part.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Highways**
 - Increased traffic
 - Highway safety concerns
 - Inadequate road infrastructure
 - Car parking concerns
 - Countryside and Landscape**
 - Greenfield land
 - The green wedge should be maintained
 - Quality of landscape
 - The site is identified as a SLA
 - The site is identified as a significant element of a wider historic landscape
 - Ecology**
 - The site is designated as a SINC
 - Located in close proximity to the Local Nature Reserve
 - The site is rich in biodiversity with a high number of protected species on site Numerous wetland habitats situated throughout the site
 - Environmental Health**
 - Increased pollution
 - Land instability
 - Other Issues**
 - Other brownfield sites available for development
 - Schools are at full capacity
 - Local services and amenities unable to sustain extra population
 - Loss of a popular recreational facility and open space
 - Impact on Brecon Beacons National Trust
 - Questions the need for additional housing

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.7.12 states that in green wedges there is a presumption against development that is inappropriate in relation to the purposes of the designation.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Para. 5.3.11 states that non statutory designations such as SINC can add value to the planning process, but should not unduly restrict acceptable development.

Para. 9.3.1 states that new housing development should avoid the coalescence of settlements.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may be acceptable.

Council Analysis

- **The site should be included in the Plan (C2J)**

The site has not been previously assessed as a candidate site by the Council.

The site and the supporting evidence have been assessed in accordance with the Candidate Site Assessment Process. It is considered that:

Planning Issues:

The site represents an illogical extension to the existing settlement. The development would result in an isolated form of development in a prominent, well-used area.

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

The site is designated as a SINC. All sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. A copy of the authority's individual SINC site maps and corresponding site description and analysis are also available.

Part of the site is a green wedge designation. The site was considered suitable as a green wedge designation because it contributed to:

- Protection of vulnerable undeveloped land
- Protect urban form
- Protect open nature of the land
- Prevent coalescence between and within settlements

The Council's assessment of the site remains unchanged. Details of the Council's assessment of the green wedges can be found in the Environment Background Paper.

Highways View:

Vehicular access to the site would only be permitted directly off King Street. King Street is a classified road and is recognised as a Principal Route which is heavily trafficked. In order to facilitate access to any development proposal and also to serve other proposed sites within the immediate locality, a new junction would need to be constructed onto King Street in accordance with any recommendations of a Traffic Impact Assessment.

Countryside and Landscape View:

Development at this site is opposed. The proposal is outside the defined and tangible settlement boundary. The site is high ground visible from the Heads of the Valleys corridor and Brecon Beacons National Park to the north; therefore there are high visual impact concerns. The development of this site would result in the loss of open countryside, which is accessible to local communities, and the impact on the Special Landscape Area would be high. Part of the green wedge falls within the settlement boundary.

Ecology View:

Development of this site is opposed, as the site is within Pond Group 1 SINC designation. The site is designated for its habitat mosaics including pond network and surround grassland. This habitat supports a number of different species including amphibians, invertebrates, breeding birds and bats as well as other mammals. It supports the ecological value of the local area and the ponds contribute to the wider network across the area of Bryn Farm and Beaufort Hills.

Environmental Health View:

There is a risk of contamination due to the site's previous industrial use. Therefore further work is required.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives although no assessment has been undertaken against the LDP Strategy.

The Council has assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the

site is greenfield land and is of high biodiversity, landscape and historic value. The site therefore performs poorly against the Sustainability Objectives when compared to the sites allocated for housing in the Plan.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objection to the inclusion of the site**

All the comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the LDP.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 16**Alternative Site Name: Land East of Pant View, Coed Cae****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
40D.171	Mr B Morgan	Unsound (CE2)	Objects to the exclusion of Land East of Pant View as a housing allocation in the Plan. Access to the site can be achieved through levelling of the land and services can be connected to the site. Also, objects to the site being designated as a SINC.

Representation – Alternative Site AS (N) 16

No	Name	Support /Object	Comment
10AS.1061	Countryside Council for Wales (CCW)	Object	Residential development at this location would erode the edge of the recently identified SLA and would lead to a loss of SINC habitats and would be contrary to LDP Objectives and Policies.
40AS.1028	Mr B Morgan (+15 people signed Petition)	Support	Supports the inclusion of the site because adjacent parcels of land have been granted planning permission and this land is no different to that of those parcels of land in terms of biodiversity and highway issues and the steepness of the land.
92AS.613	Gwent Wildlife Trust (GWT)	Object	Objects to the development of the site which is designated as a SINC.
177AS.676	Mr G Bridge (Petition + 14)	Object	Objects to the site on the grounds that the development of the site would impact on local protected wildlife, flora and fauna; construction would cause access, noise pollution and inconvenience to residents; infringement on privacy; and visual and landscape impacts.

208AS.853	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
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Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (Mr B Morgan):
 - Access to the site can be achieved
 - Services can be connected to the site
 - The site is acceptable in terms of biodiversity and should not be designated as a SINC

Desired Changes to LDP

- Inclusion of the land east of Pant View as a housing allocation in the Plan (Mr B Morgan)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

No evidence was submitted.

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Highways**
 - Construction would cause access, noise pollution and inconvenience to residents (Mr G Bridge)

Countryside and Landscape

- Erode the edge of the recently identified SLA (CCW)
- Visual and landscape impacts (Mr G Bridge)

Ecology

- Loss of SINC habitats (CCW)
- SINC designation (GWT)
- Impact on local protected wildlife, flora and fauna (Mr G Bridge)

Other issues

- Infringement on privacy (Mr G Bridge)
- Pressure on local infrastructure (Mrs Y Walker)
- Supports the inclusion of the site for the following reasons (Mr B Morgan + petition):
 - Adjacent parcels of land have been granted planning permission
 - This land is no different to that of those parcels of land in terms of biodiversity and highway issues and the steepness of the land

Desired Changes to LDP

- No change to the Plan (CCW) (GWT) (Mr G Bridge) (Mrs Y Walker)
- Inclusion of the land east of Pant View as a housing allocation in the Plan (Mr B Morgan + petition)

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Para. 5.3.11 states that non statutory designations such as SINC can add value to the planning process, but should not unduly restrict acceptable development.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Council Analysis

- **The site should be included in the Plan** (Mr B Morgan + petition)
The site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site No. C2). The site was considered to be

unsuitable for residential development on the grounds of increased traffic congestion; the existing road infrastructure is inadequate; and the site is greenfield land of high ecological and landscape value and is designated as a SINC. No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Planning Issues:

No evidence has been provided to support the issue that services can be connected to the site.

The site is designated as a SINC. All Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely: 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil, and Rhondda Cynon Taff.' These criteria may be viewed in the document, which is part of the LDP evidence base. A copy of the authority's individual SINC site maps and corresponding site descriptions and analysis are also available. The issue of the SINC designation is dealt with further under the report of LDP designation ENV3.104.

It is acknowledged that small parcels of land to the south and south west of the site have planning permission for residential development. Planning permission was granted on these sites based on their own merits. The findings of the candidate site assessment process raised concerns regarding the location of the site in that its located in an already dense residential area so the development of new housing will put added strain on the area in terms of traffic congestion.

Highways View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings remain in that the site does not abut the public highway. Given the mountain side nature of the topography of the site in relation to the existing highway network, unless a full topographical survey is completed by the applicant to determine levels it is difficult to envisage how an access road could be constructed in compliance with the Highway Authority's design guidelines. The applicant also confirms that he does not own or control the land required to construct and adoptable standard access road. As it currently stands this parcel of land is currently land-locked and vehicular access cannot be achieved for a residential development.

Ecology View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Countryside and Landscape View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

- **Objection to the inclusion of this site** (CCW) (GWT) (Mr G Bridge) (Mrs Y Walker)

All comments received during the alternative sites consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 17
Alternative Site Name: Land at Tanglewood, Blaina

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
41D.284	DTZ for Questedge Ltd (DTZ)	Unsound (CE2, CE4)	Objects to the exclusion of land on the grounds that the site provides a natural extension to the adjacent development; the site is sustainable and viable; accessible location; contribute to the economic and social growth of Blaina as an identified settlement and the site is not identified for any use within the Plan.

Representation – Alternative Site AS (N) 17

No	Name	Support /Object	Comment
10AS.1064	Countryside Council for Wales (CCW)	Object	CCW questions the need for further housing allocations. The site is within the SLA following a robust exercise based on LANDMAP. The proposal would undermine the LDP strategy.
41AS.724	DTZ for Questedge Ltd (DTZ)	Support	Supports the inclusion of the site for the following reasons: accessible; sustainable; support for Blaina town centre; appropriate location; supports the aims of the LDP.
97AS.1012	Mr D Legge (+ 48 people signed petition)	Object	Objects to the site on the grounds that the site is the last existent green buffer between Tanglewood and East Pentwyn; increased traffic, noise and pollution; loss of privacy; additional strain on road surfaces; and questions the need for housing.
159AS.899	Mrs C L Smith	Object	Object to the site on the grounds of: increased traffic, disruption and damage to the road; loss of green space

			between Tanglewood and East Pentwyn; no need for the housing in the area; and despite the housing in Tanglewood the town centre is in decline.
208AS.854	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
231AS.1056	R and A Jenkins	Object	Objects to the site on the grounds that there is a tip located above the site; water running off the mountain; congested road; road damaged due to heavy traffic; lack of local amenities i.e. schools, shops, hospital; steepness of the site; and impact on wildlife.
246AS.694	Mr & Mrs J Green	Object	Object to the site on the grounds that the level of traffic along the road is unacceptable when children are playing outdoors; and the heavy vehicles passing along this road during construction will put a strain on the road surface.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- The site should be included in the Plan for the following reasons (DTZ):
 - Natural extension to the adjacent development
 - Sustainable and viable
 - Accessible location
 - Contribute to the economic and social growth of Blaina

Desired Changes to LDP

- Inclusion of the land at Tanglewood as a housing allocation in the Plan (DTZ)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests

of soundness:	
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

SA/SEA/HRA

A Sustainability Appraisal was submitted at the candidate site assessment stage.

Compliance with LDP Strategy

The representation contends that the inclusion of the site complies with the LDP strategy. The reasons presented include:

- The development would contribute to the aims of the Plan in supporting growth at the identified settlements and delivering additional housing development to support population growth.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - Planning Issues**
 - Questions the need for further housing allocations (CCW) (Mr D Legge + petition) (Mrs C L Smith)
 - Undermine the LDP strategy (CCW)
 - Highways**
 - Increased traffic, noise and pollution (Mr D Legge + petition)
 - Additional strain on road surfaces (Mr D Legge + petition) (Mrs C L Smith) (R and A Jenkins) (Mr and Mrs J Green)
 - Congested Road (R and A Jenkins) (Mr and Mrs J Green)
 - Countryside and Landscape**
 - The site is within the SLA (CCW)
 - Last existent green buffer between Tanglewood and East Pentwyn (Mr D Legge + petition) (Mrs C L Smith)
 - Biodiversity**
 - Impact on Wildlife (R and A Jenkins)
 - Other Issues**
 - Despite the housing in Tanglewood the town centre is in decline (Mrs C L Smith)
 - Pressure on the local infrastructure (Mrs Y Walker) (R and A Jenkins)
 - Loss of privacy (Mr D Legge + petition)
 - Tip located above the site (R and A Jenkins)
 - Water running off mountain (R and A Jenkins)
 - Steepness of site (R and A Jenkins)

- Supports the inclusion of the site for the following reasons (DTZ):
 - Support for Blaina town centre
 - Appropriate location
 - Supports the aims of the LDP

Desired Changes to LDP

- No change to the Plan (CCW) (Mr D Legge + petition) (Mrs C L Smith) (Mrs Y Walker) (R and A Jenkins) (Mr and Mrs J Green)
- Inclusion of the Land at Tanglewood in the Plan as a housing allocation (DTZ)

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Council Analysis

- **Inclusion of the land at Tanglewood as a housing allocation in the Plan (DTZ)**

The site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site No. C5). The site was considered to be unsuitable for residential development on the grounds of visual impact; and development of this site would result in a loss of open space, habitat and fragmentation of the ecological complex.

Planning Issues:

It is accepted that a Sustainability Appraisal, Ecological Appraisal and Landscape and Visual Impact Scoping Report was submitted at the candidate site assessment stage. Since then no new evidence has been submitted and the Council's previous findings therefore remain.

It is acknowledged that the development of this site would be an extension to the Tanglewood residential development. However as concluded in the candidate site assessment process the visual impacts are significant at present, developing this site would make the visual impact worse.

It acknowledged that the site is located within 300m of a local convenience store and within 400m of a public transport access point. Although access to a wider range of community facilities is approximately 1000m away in Blaina Local Town Centre.

The site is of high biodiversity value and if developed for housing would impact on the quality and character of the landscape.

No new evidence assessing the site's viability and how the site would contribute to the economic and social growth of Blaina has been submitted.

Highways View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Ecology View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Countryside and Landscape View:

No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

Comment on SA:

It is acknowledged that the representor submitted a Sustainability Appraisal at the candidate site assessment stage. However, no further evidence of compliance with the Sustainability Objectives has been submitted in accordance with the candidate site assessment process.

As concluded in the Council's findings of the candidate site assessment process, the site is not considered compatible with the Preferred Strategy and Sustainability Objectives when compared to other sites allocated for residential use. The site is greenfield land of biodiversity and landscape value. In accordance with national planning policy, the Plan advocates the preference for the reuse of previously developed land over development of greenfield sites.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site** (CCW) (Mr D Legge + petition) (Mrs C L Smith) (Mrs Y Walker) (R and A Jenkins) (Mr and Mrs J Green)
All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 18
Alternative Site Name: Ffoesmaen Road

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
42D.180	Mr W Cooksey	Unsound (CE2)	Objects to the exclusion of Ffoesmaen Road as a housing allocation on the grounds that the findings of the countryside and biodiversity assessments are not a true and fair description of the land; and questions on what basis the site is a SLA.

Representation – Alternative Site AS (N) 18

No	Name	Support /Object	Comment
10AS.1067	Countryside Council for Wales (CCW)	Object	Indications are that no Sustainability Appraisal has been supplied in support of the site which does not comply with SEA Regulations. The site also forms part of a Special Landscape Area. Given the large housing numbers proposed there is no justification to depart from the proposed LDP regeneration strategy.
42AS.1023	Mr W Cooksey	Support	Supports the inclusion of the site because the biodiversity assessment undertaken at the candidate site assessment stage is inaccurate; the site is bordered by housing, can be accessed and is acceptable from environmental health purposes.
208AS.855	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be included in the Plan for the following reasons (Mr W Cooksey):
 - The findings of the countryside and biodiversity assessments are not a true and fair description of the land
 - Questions on what basis the site is a SLA

Desired Changes to LDP

- Inclusion of the land at Ffoesmaen Road as a housing allocation in the Plan (Mr W Cooksey)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

An assessment against the Sustainability Appraisal Objectives has been submitted.

Compliance with the LDP Strategy

The representation contends that the inclusion of the site complies with the LDP Strategy.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of the site for the following reasons:
 - No Sustainability Appraisal has been supplied (CCW)
 - The site also forms part of a Special Landscape Area (CCW)
 - No justification to depart from the proposed LDP strategy (CCW)
 - Too many housing allocations proposed in the Plan (Mrs Y Walker)
 - Pressure on local infrastructure (Mrs Y Walker)
- Supports the inclusion of the site for the following reasons (Mr W Cooksey):

- Biodiversity assessment undertaken at the candidate site assessment stage is inaccurate
- The site is bordered by housing
- The site can be accessed
- Acceptable from environmental health purposes

Desired Changes to LDP

- No change to the Plan (CCW) (Mrs Y Walker)
- Inclusion of land at Ffoesmaen Road for residential development (Mr W Cooksey)

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Council Analysis

- **The site should be included in the Plan** (Mr W Cooksey)

This site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site C11). The site was considered to be unsuitable for residential development on the grounds that the site is greenfield land of high biodiversity and landscape value. An independent ecological assessment and an assessment following the candidate site assessment methodology has been undertaken for the site.

Planning Issues:

It is accepted that the incorrect site boundary was submitted to the Council at the candidate site assessment stage. The new site boundary is considered where relevant below:

There are no residential properties along the immediate borders of the site however to the west of the site is the residential area of Upper Coed Cae. The site is bordered by open land to the north, east and south of the site. The western boundary of the site is partly bordered by open land and a road.

Ecology View:

With regard to the initial site proposed as an allocation within the LDP (candidate site C11, Ffosmaen Road, upper Coed Cae, Nantyglo) and the survey undertaken by the Council's ecologist (March 2008) and based on information from SEWBREC:

- The site received objections on biodiversity grounds, including the presence of protected and priority habitats and species and features of ecological connectivity; Specifically it was reported that:
- There were records of European protected species – otters (within 250m of the site).
- Section 42 species including linnet and skylark seen on site
- Habitats including rush pasture, broadleaved woodland, unimproved acid grassland, semi improved neutral grassland, mature trees and stream were present –
- Of these unimproved acid grassland, rush pasture, stream, swallow and snipe were reported as LBAP habitats and species
- It was reported that the habitats were likely to support protected species including breeding birds and bats
- Stepping stone features and/or wildlife corridors were present including a stream and dry stone walling
- The site is adjacent to Mulfran, Mynydd Coity, Mynydd James and Gwastad SINC

Further ecological surveys were recommended in light of the habitats present and potential to support protected and priority species including bats, breeding bird and reptile surveys.

The Council's ecologist based on these findings assessed LDP sites. At this time the site did not meet the SINC criteria.

'The site is enclosed by a mixture of fences and dry stonewalls. A steel fence separates the north west of the site from an adjacent welsh water site. A poorly vegetated water channel flows down along this boundary and disturbed ground lies adjacent. The majority of the site is improved grassland; a mixture of tightly grazed horse pasture and topped damp grassland.

Beyond the track which curls through the north of the site lies an area of species poor marshy vegetation, dominated by soft rush, Yorkshire fog and tufted hair grass. The southwest enclosure supports a small group of mature trees and scrub. The site contains a number of metal sheds/barns...

The site does not qualify as a SINC on the basis of this vegetation survey. The mature trees, damp vegetation, ditch and semi natural boundaries may be value to fauna communities including invertebrates, birds and amphibians'.

It is accepted that SEWBREC found inaccuracies in their methodology used to record otters since the assessment of the site at the candidate site assessment stage. SEWBREC have confirmed that this has now been rectified and that an otter has been found dead somewhere within the SO21 10km grid square, but there is insufficient information to pinpoint its exact location.

It is noted that the representor has undertaken an Ecology Appraisal on an alternative site boundary (different to the candidate site boundary as surveyed

by BGCBC and GWT) which was submitted during the alternative site consultation stage (September 2011).

In summary, the appraisal identifies:

- The presence of habitats including unimproved acid grassland, semi improved neutral grassland, marshy grassland, dwarf shrub heath in addition to areas of flush and scattered trees and buildings and bare ground
- These habitats can be classified as UK BAP priority habitats – purple moor grass and rush pasture (although considered species poor likely to support variety of species) Other habitats – acid grassland/hay meadows (meets criteria as candidate SINC based on acid grassland alone)
- LBAP habitats – dwarf shrub heath (although minor in extent), purple moor grass
- Although full species surveys were not undertaken, incidental recordings of lizard, skylark, linnet and swallow (LBAP species) were found
- It was highlighted that the habitats are likely to support species of importance for nature conservation including European protected – bats (potential for roosts and foraging although the site would have minimal value)
- Nationally protected species – breeding birds and reptiles (and bats)
- Locally important species (section 42, LBAP) – birds, bats, reptiles, amphibians

Based on the ecological information available it is evident that the site (new/alternative site boundary) supports a habitat mosaic with predominantly acid grassland, marshy grassland and smaller proportions of dwarf shrub heath, acid/neutral flush, scattered trees (as well as buildings and hardstanding). The acid grassland habitat qualifies as a SINC (according to wildlife sites criteria for south Wales and the Mid Valleys SINC criteria). It is recognised that the majority of this habitat is unlikely to be unimproved (as evidence indicates that the grassland has been subject to improvement on at least one occasion in the last few years), as a semi improved acid grassland covering an area of 1.6 ha in total and supports at least 8 species listed in the SINC criteria, it should be classified as a candidate SINC.

'If sites not included are subsequently found to qualify, for example, through the application of these criteria by ecological consultants on development sites, then the SINC protection policy in the Development Plan should be applied to ensure that the nature conservation interest is fully considered'. (Mid Valleys SINC Criteria)

Although the other remaining habitats cover the site to a lesser extent and cannot be designated as SINC's in their own right, they together form an integral part of the ecological functioning of the SINC. Therefore the majority of the site (excluding any buildings and/or hardstanding and amenity grassland) could be considered as a SINC for its mosaic of habitats.

It should not be considered to be of less value than adjacent habitats/designated SINC's, purely because it has not been designated alongside these. Sites have been surveyed and designated as SINC's across

Blaenau Gwent, on an ad hoc basis as information has come to light and not as a result of a comprehensive survey across the whole borough. Therefore it cannot be assumed that any site not designated, as a SINC would not meet the criteria.

The sites mosaic of habitats is likely to be important for a range of species groups including those that have been recorded including protected and priority species important for nature conservation. To make a full assessment of the importance of the site particularly for breeding birds, bats, reptiles, amphibians and invertebrates, detailed and specific surveys would be required.

The changing quality of the grassland indicates that the site has been managed sympathetically, to enhance the species diversity. Although appropriate management may not continue in the future, depending on the ability/resources of the landowner, this is not certain. Currently the site supports a mosaic of habitats of SINC quality – development would result in the loss and fragmentation of these habitats as well as further disturbance (on this site and the adjacent SINC). Therefore appropriate mitigation and compensation would have to be provided. The report details recommendations for this although does not include information on off site compensation - whilst the retention and creation of ecological features such as lawns, bird boxes and swales would have some value for fauna communities this would be limited and thought not able to offset the current proposals.

Based on the above, we would recommend that the site is not allocated within the LDP for future development.

Countryside and Landscape View:

Designation of Blaenau Gwent's Special Landscape Areas was based on a robust and rigorous exercise carried out by Bronwen Thomas to an agreed methodology based on the Land Map assessment for the area. The use of LANDMAP is recognised in PPW as an important information source.

This site falls within the Mulfran Special Landscape Area and is distinctive as pasture land that falls between settlement and upland heath land. A copy of the Proposals for Designation of Special Landscape Areas in Blaenau Gwent is available.

Large scale development as proposed will have a high visual impact due to the elevated nature of the site beyond the clearly defined settlement boundary.

Highways View:

The Highway Authority has completed both a site inspection and a Highway Assessment Proforma for this candidate site. It is the opinion of the Highway Authority that access to the site is obtainable although there are some constraints present. The current access is a substandard one carriageway track and would need to be improved for the development to take place.

Environmental Health View

Environmental Health completed a site assessment proforma for the site and confirmed that the site is suitable for residential development in that the site is greenfield land with no risk of contamination.

Comment on SA:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives and the LDP Preferred Strategy objectives. The Council has also assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The Council's assessment is based on the views received from the expert assessments which has produced a different result to that of the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity and landscape value.

The site performs reasonably well against the LDP Preferred Strategy and Sustainability Objectives although not as well as the sites allocated for housing in the Upper Ebbw Fach area.

LDP Strategy:

The site is located in the Northern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable growth and regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objects to the inclusion of this site (CCW) (Mrs Y Walker)**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 19

Alternative Site Name: South West of Waun Ebbw Road

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
86D.238	Harmers Ltd for Marquis of Abergavenny Estate (Harmers)	Unsound (CE2)	Objects to the exclusion of land South West of Waun Ebbw Road from the Plan on the grounds that it can be readily accessible; is not of such ecological landscape or historic importance that prevents its allocation for housing.

Representation – Alternative Site AS (N) 19

No	Name	Support /Object	Comment
10AS.1074	Countryside Council for Wales (CCW)	Object	Objects to the site as no SA has been supplied in support and that the site does not comply with SEA Regulations. The site form part of SLA. There is no justification to depart from the proposed LDP strategy.
120AS.987	Mrs P A Jenkins	Object	Objects to the site on the grounds that Glen View bungalows sit on a sub soil base of clay which would be affected by any works undertaken; grounds works would affect watercourses thus causing movement to the foundations; and high pressure gas main on site.
131AS.967	Mr N Bird	Object	Objects to the site on the ground that there is a culvert present on site which flows full during heavy rain; underground water runs directly under the bungalows; high pressure gas mains runs through the site; and concerns of land stability.
165AS.897	Mr R Tansill	Object	Object to the site on the grounds that the site has

			always been used for agricultural purposes; unstable land due to old mine workings; high pressure gas pipes on site; change the natural watercourse; increase volume of traffic; and privacy issues.
166AS.896	Mr M Gore	Object	Object to the site on the grounds that the site has always been used for agricultural purposes; unstable land due to old mine workings; high pressure gas pipes on site; change the natural watercourse; increase volume of traffic; and privacy issues.
208AS.856	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
233AS.1054	Mrs C Selway	Object	Objects to the site on the grounds that the site would overlook property, restrict light, view and privacy, and breach security; impact on wildlife and protected species; and land is waterlogged.
236AS.723	Mr A Downes	Object	Objects to the site on the grounds that planning permission was refused in the past because of the risk of damage from underground mining which could cause subsidence; and inadequate access.
252AS.627	Mr and Mrs T V Olsen	Object	Objects to this site on the grounds of that the site is unstable due to previous mining; there is a watercourse running through the area; and there is a high pressure gas pipe running through the area.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be included in the Plan for the following reasons (Harmers):

- Accessible
- The site is not of such ecological landscape or historic importance that prevents its allocation from the Plan

Desired Changes to LDP

- Inclusion of the land South West of Waun Ebbw Road as a housing allocation in the Plan (Harmers)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

No evidence was submitted.

Compliance with the LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of the site for the following reasons:
 - Planning Issues**
 - No SA submitted (CCW)
 - No justification to depart from the LDP strategy (CCW)
 - Planning permission refused in the past (Mr A Downes)
 - Highways**
 - Increased traffic (Mr R Tansill) (Mr M Gore)
 - Inadequate access (Mr A Downes)
 - Ecology**
 - Impact on wildlife and protected species (Mrs C Selway)
 - Countryside and Landscape View**
 - The site forms part of the SLA (CCW)
 - Environmental Health**
 - Land instability (Mrs P A Jenkins) (Mr N Bird) (Mr R Tansill) (Mr M Gore) (Mr A Downes) (Mr and Mrs T V Olsen)
 - Other Issues**
 - High pressure gas pipes cross the site (Mrs P A Jenkins) (Mr N Bird)

(Mr R Tansill) (Mr M Gore) (Mr and Mrs T V Olsen)

- Culvert present on site (Mr N Bird)
- Used for agricultural purposes (Mr R Tansill) (Mr M Gore)
- Privacy issues (Mr R Tansill) (Mr M Gore) (Mrs C Selway)
- Pressure on local infrastructure (Mrs Y Walker)
- Land is waterlogged (Mrs C Selway)

Desired Changes to LDP

- No change to the Plan (CCW) (Mrs P A Jenkins) (Mr N Bird) (Mr R Tansill) (Mr M Gore) (Mrs Y Walker) (Mrs C Selway) (Mr A Downes) (Mr and Mrs T V Olsen)

COUNCIL RESPONSE

Policy Context

Planning Policy Wales Edition 4 (February 2011)

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Council Analysis

- **The site should be included in the Plan** (Harmers)

This site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site C13). The site was considered to be unsuitable for residential development on the grounds of the site is 'land-locked' in respect of gaining access to the adopted public highway; and the site is Greenfield land of high ecological, landscape and historic value. No new evidence has been submitted since the Council's original assessment of the site and the Council's previous findings therefore remain.

However in response to the issues raised by the representor regarding highways, ecology and landscape the following views have been provided:

Highways View:

Further investigation has been undertaken by the Highways Department to determine if the site is landlocked. It is accepted that the ownership of the grassed verge adjacent to Waun Ebbw Road is classed as highway verge and is within the control of the Highway Authority. Therefore access could be

gained via the verge direct onto Waun Ebbw Road. Access would not be permitted via the access lane to the south of this parcel of land.

Ecology View:

It is acknowledged that the site is not designated as a site of particular nature importance. However, the site supports a mosaic of valuable habitats and wildlife corridors including semi improved grassland, wet ditches and hedgerow. The site supports habitats that may support protected species – wet ditches (amphibians, plants) and hedgerow (bats/breeding birds. The site also supports meadow brown butterfly, starling and carrion crow.

Countryside and Landscape View:

The roundhouse towers are structures associated with the historic landscape of Nantyglo which covers a much wider area around the Roundhouse Towers. There also remains high visual concerns which relate to the expansion of the settlement beyond the existing clearly defined settlement boundary out into the open countryside.

- **Objection to the inclusion of the site** (CCW) (Mrs P A Jenkins) (Mr N Bird) (Mr R Tansill) (Mr M Gore) (Mrs Y Walker) (Mrs C Selway) (Mr A Downes) (Mr and Mrs T V Olsen)

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 20
Alternative Site Name: Land North of Winches Row

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
87D.230	Harmers Limited on behalf of Deri Holdings Limited (Harmers)	Unsound (CE2)	Objects to the exclusion of land north of Winches Row as a housing allocation. The site's former allocation in the UDP and the prospect of the site coming forward for development means that a formal housing allocation should be made under policy H1.

Representation – Alternative Sites

No	Name	Support /Object	Comment
10AS.1075	Countryside Council for Wales (CCW)	Object	Indications are that no SA has been supplied in support and the proposed allocation does not comply with SEA Regulations.
18AS.802	Environment Agency (Wales) (EA)	Comment	Site has significant potential for historic contamination and a risk assessment is needed at a financial cost. Environmental permits will be required to complete ground works. Watercourses should be left open or restored to enhance wildlife.
94AS.1016	Councillor L Elias	Object	Objects to the site on the grounds that the site is adjacent to Parc Nant y Waun which has been heavily invested in with further development plans, possibly for leisure; and there is a need to keep a defined border between Nantyglo and Brynmawr.
98AS.1011	Mr and Mrs R I Manley	Object	Objects to the site on the grounds that the site forms an integral part of Parc Nant y Waun which is a green space between Brynmawr and the

			Lakeside development and a popular recreational, community resource that has recently been developed. There are also land contamination issues.
99AS.1010	Mr M Williams	Object	Objects to the site on the grounds that the development would impact on local wildlife; create social implications such as traffic congestion; and impact on health should any toxic materials be disturbed that is buried at this location.
100AS.1009	Mrs F Williams	Object	Objects to the site on the grounds that the site adjoins Parc Nant y Waun which has recently been developed; land contamination issues from former uses of the land; and impact on wildlife.
101AS.1008	Mr and Mrs P M Young	Object	Objects to the site on the grounds that the development would result on a loss of green space that is a popular recreational resource and a beautiful area.
102AS.1007	Mrs and Mrs K K Apperley	Object	Objects to this site on the grounds that the site adjoins Parc Nant y waun which has recently been developed; the park is a popular educational and recreational resource; visual impact; and land contamination issues from former uses.
103AS.1006	G Congreve	Object	Objects to the inclusion of Land North of Winches Row in the Plan.
104AS.1005	Mr G M Williams	Object	Objects to the site on the grounds that the site adjoins Parc Nant y waun which has recently been developed; the park is a popular recreational and educational facility; land contamination issues from previous uses; and drainage ditches and culverts on site.
105AS.1004	Mrs S Williams	Object	Objects to the site on the grounds that the site adjoins

			Parc Nant y Waun which has recently been developed; impact on wildlife; visual impact; questions the need for housing when there is vacant properties in Brynmawr; and land contamination issues.
106AS.1003	Miss L Mogford	Object	Objects to the site on the grounds that the site adjoins Parc Nant y Waun which has recently been developed; land contamination issues from the burial of pig carcasses in the 40s and asbestos in the 80s. Any disturbance to this land could damage the area.
107AS.1002	Mr and Mrs A Johns	Object	Objects to the site on the grounds that the site adjoins Parc Nant y Waun which has been recently developed; land contamination issues from pig carcasses being buried in the 1940s and burying asbestos from the Semtex factory in the 80s.
108AS.1001	Mrs K Meredith	Object	Objects to the site on the grounds that the site would encroach on Parc Nant y Waun which has recently been developed; the park is a well used recreational facility; and land contamination issues from the former uses (asbestos and pig carcasses).
109AS.1000	Mr R Pryke & Miss J Fookes	Object	Objects to the site on the grounds of its proximity to Parc Nant y Waun; rich in biodiversity; land contamination therefore health and safety issues; Parc Nant y Waun is an educational resource; an EIA must be undertaken; and green belt designation.
110AS.999	Mr and Mrs Price	Object	Objects to the site on the grounds that the site adjoins Parc Nant y Waun; huge investment has been spent on improving the Parc; asbestos

			and pig remains on site from the previous uses; the pond is rich in biodiversity and wildlife; and Public Right of Way crosses the site.
111AS.998	Mr and Mrs S P McCarthy	Object	Objects to the site on the grounds that there is asbestos buried in the site from the Semtex factory. If the site is disturbed there could be massive health implications.
112AS.997	Mr A Hughes	Object	Objects to the site on the grounds that there has been a huge investment into improving Parc Nant y Waun which is well used by local schools; the area is rich in biodiversity - rare birds, flowers and ducks, swans and a heron on the pond.
208AS.857	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses.
223AS.790	Mrs L O'Brien	Object	Objects to the site on the grounds of loss of wild meadow; impact on wildlife and plants; loss of recreational facility and PROW; increased traffic and light pollution; and dispute regarding boundaries.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be included in the Plan for the following reasons (Harmers):
 - Former allocation in the UDP
 - Prospect of the site coming forward for development

Desired Changes to LDP

- Inclusion of the land North of Winches Row as a housing allocation in the Plan (Harmers)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

No evidence was submitted.

Compliance with the LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of the site for the following reasons:
 - Planning Issues**
 - No SA submitted
 - Highways**
 - Increased traffic and light pollution
 - Ecology**
 - Watercourses should be left open or restored to enhance wildlife
 - Impact on local wildlife
 - Environmental Health**
 - Significant potential for historic contamination
 - Impact on health should buried toxic materials be disturbed
 - Rich in biodiversity
 - Other Issues**
 - Adjacent to Parc Nant y Waun which has been heavily invested in and is a popular recreational and community resource
 - Retain a border between Nantyglo and Brynmawr
 - Visual impact
 - Drainage ditches and culverts on site
 - Questions the need for housing
 - Public Right of Way crosses the site
 - Pressure on local infrastructure

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Council Analysis

- **The site should be included in the Plan (Harmers)**

This site was previously assessed and rejected under the Candidate Site Assessment Process (Candidate Site C15). The Welsh Government undertook a study on the site which concluded that the site may not be commercially viable without enlargement and the removal of significant development constraints. In view of this the site was further investigated as to whether the site could be enlarged. The Council concluded that the site could be enlarged to the south. However the land to the South is owned by Tai Calon and due to the uncertainty with the housing stock transfer and the requirements of Tai Calon and questions over the site's viability the site was not included in the Local Development Plan.

Local Development Plan Manual Wales (June 2006) states given "*local authorities are not starting from scratch, it is useful to review the existing plan as part of this process*". Therefore in accordance with this, the candidate site assessment process reviewed all existing undeveloped Unitary Development Plan allocations to ensure that they were deliverable and viable.

It is accepted that the site has been subject to discussions with the Council, landowner and Welsh Government. Nevertheless it is also accepted that there are significant long term constraints that need to be overcome. No further evidence has been submitted demonstrating that these constraints can be overcome and that the site is viable and deliverable within the plan period. Therefore the view of the Authority remains that the site should remain within the settlement boundary and could come forward through the planning application process as a windfall site.

- **Objection to the inclusion of the site**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 21
Alternative Site Name: Ty Pwdr

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
80D.32	Ian Roberts Consultancy on behalf of Mr Idris Watkins (Mr I Roberts)	Unsound (P1, C2, CE1, CE2, CE4)	Objects to the exclusion of land at Ty Pwdr from the Plan. Allocating the site for new residential development or for live/work units would be sustainable in terms of its location, accessibility to services and fit into the landscape without detriment to ecological issues.

Representation – Alternative Site AS (N) 21

No	Name	Support /Object	Comment
10AS.749	Countryside Council for Wales (CCW)	Object	Objects to the site on the grounds that the development would encroach into open countryside identified as part of a SINC. Development would lead to a loss of habitat and erosion of upland area and is contrary to LDP objectives and policies to protect the environment.
80AS.1032	Ian Roberts Consultancy on behalf of Mr Idris Watkins (Mr I Roberts)	Support	Support for the inclusion of land at Ty Pwdr farm.
92AS.614	Gwent Wildlife Trust (GWT)	Object	Object to development of this site which is designated as a SINC.
208AS.858	Mrs Y Walker	Object	There are too many housing allocations proposed in the Plan. The local infrastructure cannot cope with the extra number of houses. Insufficient detail has also been provided in terms of the planning history, number of houses proposed and site area.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be included in the Plan for residential or live/work units for the following reasons (Mr I Roberts):
 - Sustainable in terms of its location
 - Accessible to services
 - Fits into the landscape without detriment to ecological issues

Desired Changes to LDP

- Inclusion of the land at Ty Pwdr Farm as a housing allocation or live/work units in the Plan (Mr I Roberts)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

P1	It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.
C2	It has regard to national policy.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

SA/SEA/HRA

A Sustainability Appraisal was submitted.

Compliance with the LDP Strategy

The representation contends that the inclusion of the site complies with the LDP Strategy.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of the site for the following reasons:

Planning Issues

- Contrary to LDP objectives and policies to protect environment (CCW)
- Insufficient detail provided in terms of planning history, number of houses and site area (Mrs Y Walker)

Countryside and Landscape

- Encroach into open countryside (CCW)
- Erosion of upland area (CCW)

Ecology

- Designated as a SINC (CCW) (GWT)
- Loss of habitat (CCW)

Other Issues

- Pressure on local infrastructure (Mrs Y Walker)
- Supports the inclusion of the site (Mr I Roberts)

Desired Changes to LDP

- No change to the Plan (CCW) (GWT) (Mrs Y Walker)
- Inclusion of land at Ty Pwdr Farm in the plan as a housing allocation or live/work units (Mr I Roberts)

COUNCIL RESPONSE**Policy Context****Planning Policy Wales Edition 4 (February 2011)**

Para. 4.5.4 states that the countryside must be preserved and where possible enhanced.

Para. 4.8.1 states the preference for reuse of previously developed land over development of greenfield sites.

Para. 5.3.11 states that non statutory designations such as SINC can add value to the planning process, but should not unduly restrict acceptable development.

Paras. 9.3.3 and 9.3.4 state that housing development, including conversions, should not damage an area's character and amenity.

Paras. 9.2.22 and 9.3.6 state that new houses in countryside away from settlements recognised in Development Plans must be strictly controlled. Sensitive filling in of small gaps or minor extensions to isolated groups of dwellings may acceptable.

Council Analysis

- **The site should be included in the Plan for residential or live/work units** (Mr I Roberts)

This site was previously assessed and rejected, as part of a larger tract of land, under the Candidate Site Assessment Process (Candidate Site D27). The site was considered to be unsuitable for residential development on the grounds of the site is designated as a SINC and therefore of high ecological and biodiversity value; and development of this site would be visually obtrusive in the landscape and would have a negative effect on the character and appearance of the surrounding area. A full sustainability appraisal, independent ecological assessment and an assessment following the candidate site assessment methodology has been undertaken for the site.

Planning Issues:

The representor has submitted an amended site boundary to that considered at the candidate site assessment stage. The new site boundary is considered where relevant below:

It is acknowledged that the site is located within 400m of community facilities and a public transport access point.

It is acknowledged that this site is currently allocated in the Unitary Development Plan for residential development. Local Development Plan Manual Wales (June 2006) states given "*local authorities are not starting from scratch, it is useful to review the existing plan as part of this process*". Therefore in accordance with this, the candidate site assessment process reviewed all existing undeveloped Unitary Development Plan allocations to ensure that they were deliverable and viable.

The site received planning permission for residential development in 1993, 1998 and 2003. There is no extant planning consent at this site as planning permission was recently refused at the site in April 2010 for residential development on the grounds of the proposal would effect the character and appearance of the area, recorded archaeological sites; and ecology and biodiversity.

The site is designated as a Site of Importance for Nature Conservation. SINC's were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely: 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil, and Rhondda Cynon Taff.' These criteria may be viewed in the document, which is part of the LDP evidence base. A copy of the authority's individual SINC site maps and corresponding site descriptions and analysis are also available. The issue of the SINC designation is dealt with further under the report of LDP designation ENV3.132.

Ecology View:

The initial site proposed as an allocation within the LDP as site D27, Ty

Pwdr/Greenmeadow farm, Abertillery

- The site allocation received objections on biodiversity grounds including the presence of protected and priority habitats and species and ecological connectivity features
- The site is within the Greenmeadow SINC and adjacent to the Mulfran, Mynydd Coity, Mynydd James and Gwastad SINC
- Protected species recorded on site including European – bats and nationally protected – badger (within 250m) and bluebell
- Likely to support locally important species including section 42 and LBAP
- Habitats recorded include semi natural broadleaved woodland, scrub, unimproved acid grassland, semi improved neutral grassland, wet woodland (alder carr), mire, running water, rocky outcrops and rush pasture
- LBAP habitats include wet woodland, upland oak and beech woodland, unimproved acid grassland, rush pasture and streams
- Habitats likely to support protected species including bats, breeding birds and reptiles
- Site contains stepping-stones and/or wildlife corridors
- Site contain mature and/or veteran trees and hedgerows

Further ecological surveys were recommended in light of the habitats present and potential to support protected and priority species including bats, badgers, breeding bird, reptile and amphibian and invertebrate surveys as well as distribution of bluebell.

Further surveys were undertaken to form part of the planning application with findings collated in the report – land at Ty Pwdr and Greenmeadow, Cwmtillery Ecological assessment (David Clements Ecology Ltd, 2009).

It is stated that the site (Ty pwdr and part of greenmeadow) supports high quality semi natural habitats, which justify and supports its inclusion within the Greenmeadow SINC. Although not a UK BAP habitat, acid grassland is of high quality supporting 10 of the species considered to be indicative of acid grassland as documented in the SINC criteria (south Wales and Mid Valleys). As SINC habitats on Ty pwdr, they are considered to be of district value but when considered as a mosaic/integral part of the Greenmeadow site they are considered as of county value - therefore important both locally and regionally. The hedgerows are also considered to be UK BAP habitats and contain several semi mature to mature trees, providing important habitat for a number of breeding birds and bats (legally protected species). There are also a number of UK BAP species found on site as well as LBAP habitats and species, thus indicating both local and national importance.

The development of 26 plots on Ty pwdr was predicted to result in the loss of the majority of the acid and marshy grassland, with a hedgerow being breached in 2 places and stream being culverted at one point. Although some habitats would be retained within the development with hedgerow, streams and larger trees (and possibly the peripheral areas of grassland) being protected by buffer zones of 5-10m from development. It is however noted

that the retained habitats would be likely to suffer from elevated levels of disturbance both during and after construction.

Detailed proposals for mitigation includes:

Compensation

- Management plan incorporating findings of recent surveys and identifying key ecological areas. Setting out prescriptions for their beneficial management for wildlife
- This should include the Greenmeadow part of the site (to be retained in original application) – area would benefit from a restricted grazing regime and appropriate monitoring as well as better management of the pond within Greenmeadow
- Establishment of native grasslands in suitable areas within the development
- Planting of native trees and shrubs around the periphery of the site including hedgerows, enhancing existing
- Adjacent off site habitats to be protected
- Streams to be protected with buffer retaining semi natural habitats
- Where streams culverted they should allow passage by species such as otter
- Water pollution protection measures to be implemented
- Specific species mitigation recommended in addition to updated surveys

An addendum to this report has been produced in October 2011 confirming that the proposed area supports semi improved acid grassland, with non-stock hedgerows separating the fields. Several small streams flow through the site and there are areas of marshy grassland adjacent to these.

The proposal is now to build 20 houses with infrastructure on 1.3ha (including gardens) of the 2.8 ha total area.

Development will result in the loss and fragmentation of habitats including breach of hedgerows in 2 areas, as well as the stream, which would need to be culverted.

The report states that the 20-unit scheme will ensure ‘the retention of the existing habitats in and around the development area’ – with the retained hedgerow, streams and larger trees in the area having a 5-10 metre protection zone alongside or surrounding them including the retention of acid grassland.

Although it is difficult to determine the exact impacts due to the nature of the application and lack of detailed proposal, based on the proposals made, existing ecological data and mitigation measures proposed we would not recommend that the site is developed. This proposal will result in the loss of the majority of acid grassland within Ty Pwdr, which justifies SINC designation in its own right but also contributes significantly to the overall area of this habitat and other habitats within the Greenmeadow SINC and thus forming an integral ecological component of the wider area. Although the proposals are

to develop a smaller area of the Ty pwr site, it is likely that the impacts on the habitats and species, valued to be of high value for nature conservation, will be high – habitats would be lost and fragmented, in addition to deterioration as a result of increased disturbance within and adjacent to the site during and post construction which would make it difficult to provide adequate compensation on site. **This site should not be developed.**

It should also be highlighted that CCW's comments (ref 09.91.01, June 2008) stating that 'CCW does not object to the application providing that appropriate measures are put in place to address ecological and landscape issues' were made without sufficient material information relating to the ecological importance of the site, which are now required by legislation and planning policy. Therefore should not be used as justification of support for this application.

Countryside and Landscape View:

Development opposed at this site A study undertaken by Bronwen Thomas in 2008 using the recognised LANDMAP assessment criteria classifies the site as being of high value and therefore included in the Cwmtillery Special Landscape Area. There are also visual impact concerns over the wider valley area.

Environmental Health View:

As part of the candidate site assessment process, Environmental Health completed a site assessment proforma for the site and considered that there is potential for contaminated land therefore a ground investigation and risk assessment is required at the site. It is noted that the representor has a contrary view and considers that the site is suitable for residential development in terms of contamination. However, no evidence has been submitted to substantiate this view.

Highways View:

The Highway Authority has completed both a site inspection and a Highway Assessment Proforma for this candidate site. It is the opinion of the Highway Authority that access to the site is obtainable although there are some constraints present. Access is only viable through Hillcrest View.

The existing highway network serving as access to the site will require localised highway improvements. These works will include road widening, footway provisions and minor junction improvements and would need to be constructed and designed to comply with the Highway Authority design guidelines and in accordance with any recommendations of a Traffic Impact Assessment.

Comment on SA / LDP Strategy:

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives and the LDP Preferred Strategy objectives although it is not clear for what use the site has been assessed (residential or live/work).

The Council has assessed the site (for both proposed uses) against the LDP

Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The Council's assessment is based on the views received from the expert assessments. The assessment for residential use has produced a different result to that of the assessment undertaken by the representor. The representor fails to take account of a number of issues such as that the site is greenfield land and is of high biodiversity, landscape and historic value. The site performs poorly against the LDP Preferred Strategy and Sustainability Objectives when compared to other sites allocated for residential development in the Plan.

In terms of the live/work proposed use assessment, the Council cannot compare the site to other sites proposed for live/work units. However, it remains the view that there are significant constraints to the development of this site in terms of its biodiversity, landscape and historic value.

LDP Strategy:

The site is located in the Southern Strategy area. The deposit LDP allocates sufficient land to deliver sustainable regeneration in this area through favouring the reuse of previously developed land within existing settlements. This site would not therefore support the delivery of the LDP strategy.

- **Objection to the inclusion of the site** (CCW) (GWT) (Mrs Y Walker)
All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for allocation in the Plan.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 22
Alternative Site Name: Blaencyffin Mine

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
2D.11	Mr G Holloway	Unsound (CE2)	This site should be included in the Plan as a tourism and leisure allocation as it will bring employment, regeneration, leisure, tourism and help to cut out crime and social disorder with very minimal impact on the environment whilst benefiting from local support.

Representation – Alternative Site AS (N) 22

No	Name	Support /Object	Comment
10AS.751	Countryside Council for Wales (CCW)	Comment	CCW recommends that 'Chapter 9.0: Delivery and Implementation ' identifies the need for proposals at this site to be supported by a survey to confirm whether the site has any protected or BAP habitat or species present.
18AS.808	Environment Agency (EA)	Comment	EA explains about the significant potential for historic contamination on the site and recommends that a preliminary risk assessment is undertaken to establish the risk to controlled waters and to ensure the site is suitable for annotation.
208AS.668	Mrs Y Walker	Object	Disagree with housing being proposed at these sites. The land surrounding them is mainly rural and there are serious environmental issues including biodiversity.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The site should be included in the Plan for tourism and leisure (Mr G Holloway)

Desired Changes to LDP

- Inclusion of Blaencyffin Mine as a tourism and leisure allocation in the Plan (Mr G Holloway)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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SA/SEA/HRA

Evidence was submitted

Compliance with LDP Strategy

Evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Needs ecological survey (CCW)
- Potential for historic contamination (EA)
- Disagrees with housing (Mrs Y Walker)

Desired Changes to LDP

- Change not clearly stated (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be included in the Plan for tourism and leisure** (Mr G Holloway)

The site comprises a large tract of open land in the countryside which lies within a Special Landscape Area (ENV2.1) and a 200m buffer zone for a preferred area for minerals (M4.2). It is also in close proximity to a SINC (ENV3.118).

The representor proposes that the site is used for paintballing and allocated for tourism and leisure in the LDP. Sites should only be allocated in LDPs where there is certainty in terms of deliverability. In this case there is no evidence of that, as the representor has not provided any supporting documentation such as potential sources of funding for the project. This proposed allocation is therefore not justified.

It is acknowledged that the representor has assessed the site against the sustainability appraisal objectives and the LDP Preferred Strategy objectives. The Council has also assessed the site against the LDP Strategy and Sustainability Objectives in accordance with the candidate site assessment process. The Council's assessment is based on the views received from the expert assessments, which has produced a different result to that of the representor. The representor fails to take account of issues such as that the site is greenfield land and is of high biodiversity and landscape value.

All comments received during the alternative site consultation are noted. It appears that Mrs Y Walker has misunderstood the proposal as the request is to allocate the site for tourism and leisure and not housing.

Conclusion

It is not considered that there is a realistic prospect of tourism and leisure being provided on the land in question during the plan period.

The Council considers that the site is inappropriate for allocation as tourism and leisure.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 23
Alternative Site Name: Parc Arrael Griffin

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
69D.303	Mr S Jones	Unsound (CE1,CE1,CE2)	Parc Arrael Griffin should be included in the Plan as a tourism and leisure allocation.
82D.308	Six Bells Communities First (SBCF+ 171 signed petition)		This site should be included in the Plan as a tourism and leisure allocation. The former colliery site forms part of the VRP and the creation of Parc Arrael Griffin will further enhance and build upon impact of regeneration initiatives such as the Guardian which is being used by VRP and Hearts and Soul programme to attract visitors to VRP.
83D.322	Mr A Thomas	Unsound (CE1,CE1,CE2)	Parc Arrael Griffin should be included in the Plan as a tourism and leisure allocation.

Representation – Alternative Sites

No	Name	Support /Object	Comment
10AS.752	Countryside Council for Wales (CCW)	Object	Incorporates three SINC's, should this site be allocated development should seek to protect the integrity of the SINC's or make provision for mitigation to meet LDP policies and Objectives.
18AS.812	Environment Agency (EA)	Comment	The Area lies partially within zone C2. Developers need to demonstrate through FCA how flooding can be managed over the lifetime of the development. The alternative use of Tourism and Leisure would be a less vulnerable development as defined in TAN15.

92AS.616	Gwent Wildlife Trust (GWT)	Object	Objects to the development of part of this site, which is designated as a SINC and Local Nature Reserve.
208AS.859	Mrs Y Walker	Support	Disagrees with housing being proposed at these sites. The land surrounding them is mainly rural and there are serious environmental issues including biodiversity. The Six Bells site is also prone to flooding.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation(s) are as follows:

- The site should be included in the Plan for tourism and leisure (SBCF + petition) (S Jones) (A Thomas)

Desired Changes to LDP

- Inclusion of Parc Arrael Griffin as a tourism and leisure allocation in the Plan (SBCF + petition) (S Jones) A Thomas)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan, which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.

SA/SEA/HRA

No evidence was submitted

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to site on grounds of:
 - SINCS (CCW) (GWT)
 - Local Nature Reserve (GWT)
- Objects to Housing (Mrs Y Walker)
- FCA required (EA)

Desired Changes to LDP

- No change to the Plan (CCW) (GWT) (Mrs Y Walker) (EA)

COUNCIL RESPONSE

Council Analysis

- **The site should be identified in the Plan for Tourism and Leisure** (SBCF + petition) (S Jones) (A Thomas)

The former Six Bells Colliery site consists of three plateaux, the top plateau has been allocated (H1.14) for residential use in the LDP, whilst the lower plateau is allocated for community facilities (ED1.2). The middle plateau does not have a specific allocation. It consists of open space and contains the Guardian, the largest mining memorial in Wales, which is proving a great tourist attraction. The representor proposes that the site (which does not include the above allocations) is developed as a park and allocated for tourism and leisure in the LDP.

The site has already been developed for tourism and therefore does not need to be allocated in the Plan. Essentially the Plan does not identify parkland but protects such areas through policies. Policy DM14 Protection of Open Space and Policy DM16 Protection and enhancement of the Green Infrastructure provide adequate protection for areas of open space that do not have any formal allocation within the Plan.

- **Objections to site allocation because of SINCS/LNR** (CCW) (GWT)
Objections noted.

- **Objects to housing** (Mrs Y Walker)

The representor does not appear to understand that this alternative site has been proposed for tourism and leisure and not residential development.

- **FCA required (EA)**

Noted.

Conclusion

Tourism development has already been carried out at the site as demonstrated by the establishment of the Guardian on the middle plateau,

Therefore the Council considers that the site does not require allocation as tourism and leisure.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (N) 24**Alternative Site Name: Land adjoining Llanhilleth Pithead Baths****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound / Unsound	Comment
1D.87	Mr P Davidson	Unsound (CE2,CE3)	This site should become a parkland and included in the Plan as a tourism and leisure allocation as Llanhilleth has no park at all.

Representation – Alternative Site AS (N) 24

No	Name	Support /Object	Comment
10AS.755	Countryside Council for Wales (CCW)	Object	It is indicated that no SA has been supplied in support of this allocation. We don't consider the allocation complies with SEA Regulations. Site mostly consists of woodland, development should minimise the loss of trees and ensure connectivity.
161AS.958	Llanhilleth Tenants and Residents Association (LTRA)	Support	Supports proposal to designate the site for Tourism and Leisure.
208AS.861	Mrs Y Walker	Support	Disagree with housing being proposed at these sites. The land surrounding them is mainly rural and there are serious environmental issues including biodiversity.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The site should be included in the Plan for tourism and leisure (Mr P Davidson)

Desired Changes to LDP

- Inclusion of land adjoining Llanhilleth Pithead Baths as a tourism and leisure allocation in the Plan (Mr P Davidson)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE3	There are clear mechanisms for implementation and monitoring.

SA/SEA/HRA

No evidence was submitted

Compliance with LDP Strategy

No evidence of compliance with the LDP objectives was submitted.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of this site for the following reasons:
 - No SA has been supplied in support of this allocation (CCW)
 - Development should minimise the loss of trees and ensure connectivity (CCW)
- Support for the inclusion of the land as a tourism and leisure allocation (LTRA) (Mrs Y Walker)

Desired Changes to LDP

- No change to the Plan (CCW)
- Inclusion of the site as a tourism and leisure allocation in the Plan (LTRA) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The site should be included in the Plan for tourism and leisure** (Mr P Davidson) (Mrs Y Walker) (LTRA)

The representor has suggested this site is allocated for development as parkland because Llanhilleth does not have a park. This is not the case as Llanhilleth Park is situated adjacent to St Illtyd's Primary School.

The site proposed forms part of the Blaenau Gwent Green Network and lies on the Ebbw Fach Trail. As such policy DM16 'Protection and enhancement of the Green Infrastructure' will protect and allow enhancement of such sites. Further information on the Green Infrastructure is available in the Environment Background Paper. Essentially the Plan does not identify parkland but protects such areas through policies in the plan.

- **Objection to the inclusion of this site** (CCW)

All comments received during the alternative site consultation are noted.

Conclusion

The Council considers that the site is inappropriate for allocation as tourism and leisure.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

The Council recommends to the Planning Inspector that no change should be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan

Alternative Site Ref: AS (N) 25
Alternative Site Name: Aberbeeg Railway Station

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound / Unsound	Comment
83D.112	Mr A Thomas	Unsound (C1, CE1, CE2, CE4)	The Plan is all about improved links but no there is no plan for a rail station at Aberbeeg.

Representation – Alternative Site AS (N) 25

No	Name	Support /Object	Comment
No comments received			

Summary of Key Issues at Deposit Stage

The key issues identified in the representation is as follows:

- Need for new rail station at Aberbeeg (Mr A Thomas)

Desired Changes to LDP

- Identify new station at Aberbeeg (Mr A Thomas)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C1	It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.
CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
CE4	It is reasonably flexible to enable it to deal with changing circumstances.

SA/SEA/HRA

No evidence submitted.

Compliance with LDP Strategy

No evidence of compatibility with LDP objectives submitted.

COUNCIL RESPONSE

Council Analysis

- **Need for new rail station at Aberbeeg** (Mr A Thomas)
Due to technical reasons relating to the distance from the train and the platform, it is not possible to site a modern, passenger railway station at this location at Aberbeeg. Other potential station locations were investigated but they do not have appropriate vehicular access. Therefore, it has not been possible to identify a rail station in this area.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representation.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (SB) 01
Alternative Site Name: Little Lane

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
17D.161	C2J Architects for W R Merrick & Sons (C2J)	Unsound (CE4)	The settlement boundary doesn't incorporate recently completed residential development at Little Lane, Beaufort which was developed in tandem with recently completed residential development at Big Lane, which is included in the settlement boundary.

Representation – Alternative Site AS (SB) 01 – Include in Settlement Boundary

No	Name	Support /Object	Comment
118AS.992	Mr S Backen	Object	Objects to the settlement boundary change because the entrance to the lane is too small for extra traffic; proximity to the nature reserve; and interference would ruin the ecosystem.
172AS.891	Mrs M Penny	Object	Objects to the settlement boundary change on the grounds of the site is greenfield land close to areas rich in wildlife, flora and fauna; Beaufort woodlands adjoins the site which is a popular recreational facility; increased pollution; loss of green wedge; and inadequate road infrastructure.
173AS.883	Mrs M Penny	Object	Object to the settlement boundary change on the grounds that the site is greenfield land; sufficient brownfield sites available; Impact on biodiversity; loss of recreational facility; increase in traffic and pollution; parking problems; and loss of the green

			wedge.
174AS.685	Mr S Penny	Object	Objects to the settlement boundary change on the grounds of the site is greenfield land; sufficient brownfield land available for development; high biodiversity value; loss of recreation facility; traffic, parking and pollution issues; and loss of green wedge.
178AS.674	Miss S Kibby	Object	Objects to the settlement boundary change on the grounds of more housing would increase the volume of traffic; the loss of the green wedge; change the quality of the landscape; visual impact; and impact on the natural wildlife and flowers.
179AS.671	Mr J Kibby	Object	Objects to the settlement boundary change on the grounds of highway safety issues due to increased traffic; the need to retain the green wedge; and any housing development would encroach on the natural habitats that exists in the area.
188AS.654	Mrs G Kibby	Object	Objects to the settlement boundary change on the grounds of increased traffic volume; highway safety; maintenance of the green wedge between Beaufort and Brynmawr; visual impact; impact on the quality of the landscape; and loss of wildlife and flowers.
198AS.878	Miss B Trapnell	Object	Objects to the settlement boundary change on the grounds of the site is greenfield which is well used by the community for leisure; increased traffic will increase pollution; impact on biodiversity; and the need to maintain the green wedge between Beaufort and Brynmawr.
199AS.871	Mr J Poole	Object	Objects to the settlement

			boundary change on the grounds that the site is greenfield which is well used by the community for leisure; increased traffic will increase pollution; impact on biodiversity and the need to maintain the green wedge between Beaufort and Brynmawr.
208AS.709	Mrs Y Walker	Object	There are far too many houses being proposed, the current housing shortage will not be addressed by building so many houses in this area .The north south divide will force people further afield to look for work.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The settlement boundary should be amended to include recently completed residential development at Little Lane (C2J)

Desired Changes to LDP

- Amend the settlement boundary to include land at Little Lane (C2J)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE4	It is reasonably flexible to enable it to deal with changing circumstances.
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Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of land at Little Lane in the settlement boundary for the following reasons:

Highways

- Inadequate road infrastructure
- Increased traffic
- Parking problems

Countryside and Landscape

- Greenfield land
- Interference would ruin the ecosystem
- Loss of green wedge

- Visual impact

Ecology

- Proximity to the nature reserve which is a popular recreational facility
- Impact on biodiversity

Environmental Health

- Increased pollution

Other Issues

- Sufficient brownfield sites available
- Questions the need for further housing

Desired Changes to LDP

- No change to the Plan

COUNCIL RESPONSE

Council Analysis

- **The settlement boundary should be amended to include recently completed residential development at Little Lane (C2J)**

Whilst the site was not formally submitted as a settlement boundary change as part of the candidate assessment process, this site has been previously considered as part of the settlement boundary review.

Planning Issues:

The Candidate Site Methodology Background Paper sets out the methodology employed for the settlement boundary review. It is acknowledged that the site gained planning permission in 2006, although against officer recommendation, for residential development which has since been implemented.

The settlement boundary is a key mechanism for achieving resource efficient settlements and to indicate where growth will be permitted. The settlement boundary should promote the full and effective use of urban land thus concentrating development within settlements by preventing coalescence, ribbon development and fragmented development. As reflected below further growth will not be permitted on the grounds of highways and landscape concerns. The development also falls within the category of ribbon development and fragmented development in terms of its relationship with the settlement boundary and the surrounding area.

Highways View:

This site was granted planning permission despite highways concerns regarding the substandard access. Whilst there are no objections to this area being included within the settlement boundary it is recommended that the settlement boundary be restricted to only include the existing northern most dwelling building line and exclude the area of land (garden to the north). This

is to prevent any residential development being served via Little Lane which is in the opinion of the Highway Authority substandard and cannot be upgraded due to third party ownership issues.

Countryside and Landscape View:

The site lies outside the settlement area and within an upland landscape. Further development in this area would introduce residential built forms alien in character to the local landscape context with such a high impact that it is deemed unacceptable.

- **Objection to the inclusion of land at Little Lane in the settlement boundary**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for inclusion in the settlement boundary.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (SB) 02**Alternative Site Name: Land adjacent to Tafarn Ty Uchaf****SUMMARY OF REPRESENTATIONS****Representation – Deposit Draft LDP**

No	Name	Sound/ Unsound	Comment
65D.12	Mr M Roberts	Unsound (CE2)	Representation seeks to include land adjacent to Tafarn Ty Uchaf Public House, Trefil, within the settlement boundary on the grounds that it shall agree with planning approval 2011/0007 for a change of use of the existing building to that of a residential property with such provision of off road parking and adjoining garden area to be provided within that enclosed area.

Representation – Alternative Site AS (SB) 02 – Include in Settlement Boundary

No	Name	Support /Object	Comment
10AS.778	Countryside Council for Wales (CCW)	Object	Objects to the settlement boundary change on the grounds that that it does not follow any linear feature along its northwestern edge and does not constitute a logical edge to the settlement boundary.
208AS.711	Mrs Y Walker	Object	The proposal is very vague and does not give much information.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The settlement boundary should be amended to include land adjacent to Tafarn Ty Uchaf Public House, Trefil (Mr M Roberts)

Desired Changes to LDP

- Amend the settlement boundary to include land adjacent to Tafarn Ty Uchaf Public House, Trefil (Mr M Roberts)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of the land adjacent to Tafarn Ty Uchaf Public House, Trefil, in the settlement boundary for the following reasons:
 - Does not follow any linear feature along its northwestern edge and does not constitute a logical edge to the settlement boundary (CCW)
 - Vague proposal (Mrs Y Walker)

Desired Changes to LDP

- No change to the Plan (CCW) (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The settlement boundary should be amended to include land adjacent to Tafarn Ty Uchaf Public House, Trefil** (Mr M Roberts)

Whilst the site was not formally submitted as a settlement boundary change as part of the candidate assessment process, this site has been previously considered as part of the settlement boundary review.

Planning Issues:

The Candidate Site Methodology Background Paper sets out the methodology employed for the settlement boundary review. It is acknowledged that the site gained outline planning permission for a proposed dwelling plot in 2011, although against officer recommendation.

The settlement boundary is a key mechanism for achieving resource efficient settlements and to indicate where growth will be permitted. The settlement boundary should promote the full and effective use of urban land thus concentrating development within settlements by preventing coalescence, ribbon development and fragmented development.

To include this land in the settlement boundary would result in drawing an illogical boundary that followed no defensible line. The surrounding area is also of rural character to the far north, west, and east of the site. If a boundary was to be drawn the Greenfield land further north could come under pressure for development.

Highways View:

This site was subject to a formal planning application which was recommended for approval by the Highway Authority. There are thus no objections to the inclusion of this parcel of land within the settlement boundary.

Countryside and Landscape View:

The boundary proposal is not defensible as it lies across the middle of open pasture (enclosed). The boundary for most of Trefil follows the building line which is robust and defensible.

- **Objection to the inclusion of the land adjacent to Tafarn Ty Uchaf Public House, Trefil, in the settlement boundary**

All comments received during the alternative site consultation are noted.

Conclusion

The site is considered unsuitable for inclusion in the settlement boundary.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (SB) 03
Alternative Site Name: Holly Tree, West Bank

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
59D.241	Mr M Richards	Unsound (CE2)	Representation seeks to include the property and land at Holly Tree, West Bank, Cwmtillery within the settlement boundary on the grounds that the land is brownfield, scrub land; it would enhance the appearance of the area; and control the spread of Japanese knotweed.

Representation – Alternative Site AS (SB) 03 – Include in the Settlement Boundary

No	Name	Support /Object	Comment
229AS.1030	Mrs A Dobbin (+40 signed petition)	Object	Objects to the settlement boundary change on the grounds that the development would compromise the privacy and sunlight of the properties; the mountain is unstable; drainage issues; and Top Row houses were demolished due to mountain slipping.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The settlement boundary should be amended to include Holly Tree, West Bank, Cwmtillery for the following reasons (Mr M Richards):
 - The land is brownfield scrub land
 - Enhance the appearance of the area
 - Control the spread of Japanese knotweed

Desired Changes to LDP

- Amend the settlement boundary to include Holly Tree, West Bank, Cwmtillery (Mr M Richards)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

CE2	The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and/or are founded on a robust and credible evidence base.
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Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Objects to the inclusion of the property Holly Tree, West Bank in the settlement boundary for the following reasons (Mrs A Dobbin + petition):
 - Development would compromise the privacy and sunlight of the properties
 - The mountain is unstable
 - Drainage issues
 - Top Row houses were demolished due to mountain slipping

Desired Changes to LDP

- No change to the Plan (Mrs A Dobbin + petition)

COUNCIL RESPONSE

Council Analysis

- **The settlement boundary should be amended to include Holly Tree, West Bank, Cwmtillery** (Mr M Richards)

The site has been previously assessed under the settlement boundary review process (site reference: 22). The proposed land to be included in the settlement boundary is garden land to the rear of the Holly Tree dwelling. The assessment concluded that to include this land in the settlement boundary would result in drawing an illogical boundary that followed no defensible line. The surrounding area is also of rural character to the far north, west and south of the site. If a boundary was to be drawn this Greenfield land would have to be included which could come under pressure for development.

It is acknowledged that the site (the garden land) is brownfield land as the site was originally gardens for a row of miners cottages which were demolished 20-30 years ago. It is also acknowledged that there is Japanese knotweed present on site and the landowner has taken action to eradicate the knotweed, however there is an area within the site boundary that is still affected by knotweed.

With regard to the enhancement of the character and appearance of the area, the development would need to be in accordance with Policy DM2 which

seeks to ensure that developments are of good design which reinforce local character and distinctiveness of the area.

Policy SB1 of the deposit Plan adopts a positive approach to sensitive infilling of small gaps within small groups of houses, or minor extensions to groups outside the settlement boundary. It is more appropriate for this proposal to be considered against policy SB1 rather than amend the settlement boundary and put other Greenfield land under pressure.

- **Objects to the inclusion of the property Holly Tree, West Bank in the settlement boundary** (Mrs A Dobbin + petition)

All comments received during the alternative site consultation are noted.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

Alternative Site Ref: AS (SB) 04
Alternative Site Name: Land adjacent to the former Remploy Site, Aberbeeg

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/Unsound	Comment
49D.178	Pontypool Park Estate (PPE)	Sound	Include land to the north and west of the former Remploy site in Aberbeeg within the settlement boundary to allow for a more flexible design and to improve the quality of any future redevelopment scheme.

Representation – Alternative Site AS (SB) 04

No	Name	Support /Object	Comment
208AS.713	Mrs Y Walker	Object	Insufficient information provided.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- The settlement boundary should be amended to include the former Remploy site for the following reasons (PPE):
 - Allow for a more flexible design
 - Improve the quality of any future redevelopment scheme

Desired Changes to LDP

- Amend the settlement boundary to include the former Remploy site (PPE)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

None identified

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Insufficient information provided (Mrs Y Walker)

Desired Changes to LDP

- Change not clearly stated (Mrs Y Walker)

COUNCIL RESPONSE

Council Analysis

- **The settlement boundary should be amended to include the former Remploy site (PPE)**

Whilst the site was not formally submitted as a settlement boundary change as part of the candidate assessment process, this site has been previously considered as part of the settlement boundary review.

Planning Issues:

The representor seeks the inclusion of two parcels of land within the settlement boundary, one to the north and the second to the west of the former Remploy site in Aberbeeg. The larger parcel of land to the north is steeply sloping land with significant tree coverage. The smaller parcel of land to the west comprises of an area of hard standing (to the south) which is currently used as a car park and an area of grassland to the north. The Ebbw Fach River crosses through both parcels of land therefore part of the land to the north is located in flood zone C2 and C1. The hard standing area of the western site is located in flood zone C1.

The purpose of the settlement boundary is to indicate where growth will be permitted within which development would normally be allowed. As recognised by the representor the topography of both extensions would prevent actual development on the land but would allow for a more flexible design to improve the quality of any development scheme. It is therefore considered that the small area of hard standing should be included in the settlement boundary as it is an area that could be developed (for less vulnerable development) and a logical and defensible boundary can be drawn. However as no development can take place on the remaining land due to the topography of the land and associated constraints and that the appropriate landscaping can be incorporated into the redevelopment scheme although located outside the settlement boundary, it is considered that the remainder of the land should remain outside the settlement boundary.

Highways View:

There are no objections in principle to the inclusion of the land within the settlement boundary. However, any future application for development would be required to provide localised highway improvements along Old Blaina Road/ Bridge Street to facilitate additional traffic / pedestrian movements.

Biodiversity View:

To the south east is an area of hard standing used as a car park and to the north west there is an enclosed area of grassland, which appears to be semi improved with scrub/trees around the boundary as well as a small area of

grassland/scrub on the other side of the river. Along the western edge is a hedgerow. The eastern side of this area slopes towards the river, which runs across the north eastern corner. Grassland and trees provide good habitat and particularly important as marginal river habitat. Likely to support breeding birds, bats (potentially foraging and roosting opportunities) potentially otters. Further surveys required include habitat and vegetation, bats and otters. The south eastern section of the site which is made up of hardstanding could be allocated as well as part of the north western site on the eastern side of the river.

Countryside and Landscape View:

The areas suggested are not logical extensions of the settlement boundary. The smaller area (south) lies on the opposite side of the main access road with a bridge structure to cross the river. Larger area to the north is steeply sloping open field merging into woodland. The change of slope forms a logical boundary as defined by the existing LDP settlement boundary.

- **Insufficient information provided** (Mrs Y Walker)
Noted.

Conclusion

Inclusion of the area of hard standing within the western parcel of land within the settlement boundary.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that the Settlement Boundary be amended on the Proposals Map to include part of the Land adjacent to the former Remploy Site for the following reasons:

- The land is brownfield land
- Potential for development (for less vulnerable development)

Map 12 at Appendix 3 shows the proposed settlement boundary amendment.

Reason for Recommendation

The proposed change is not substantive but would allow this area of land to be developed. Importantly the change would not affect the soundness of the

plan.

Alternative Site Ref: AS (A) 12
Alternative Site Name: Blaina Local Town Centre

SUMMARY OF REPRESENTATIONS

Representation – Deposit Draft LDP

No	Name	Sound/ Unsound	Comment
47D.371	Nantyglo & Blaina Town Council (NBTC)	Unsound (C4, CE1)	Objects to the town centre boundary drawn for Blaina. The boundary should be extended to include properties along High Street and the area immediately adjoining the town centre area to meet the criteria of becoming a district town centre.

Representation – Alternative Site AS (A) 12 – Extend town centre boundary

No	Name	Support /Object	Comment
47AS.621	Nantyglo & Blaina Town Council	Support	Support the proposed amendment to extend Blaina town centre boundary.

Summary of Key Issues at Deposit Stage

The key issues identified in the representation are as follows:

- Objects to Blaina town centre boundary. The boundary should be extended to include properties along the High Street and the adjoining area (NBTC)

Desired Changes to LDP

- Extend the town centre boundary to include properties along High Street and the area immediately adjoining the town centre (NBTC)

Test of Soundness

The representation(s) indicate that the LDP fails to satisfy the following tests of soundness:

C4	It has regard to the relevant community strategy/ies (and National Park Management Plan).
CE1	The plan sets out a coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities.

Summary of Key Issues at Alternative Site Stage

The key issues identified in the representation(s) are as follows:

- Support for the amendment to extend Blaina town centre boundary (NBTC)

Desired Changes to LDP

- No change to the Plan (NBTC)

COUNCIL RESPONSE

Council Analysis

- **Objects to Blaina town centre boundary. The boundary should be extended to include properties along the High Street and the adjoining area**

The representor is seeking the extension of the Blaina town centre boundary to meet the criteria of becoming a District Centre.

Disagree. The suggested town centre boundary extension still fails to meet the criteria of becoming a District Centre. The suggested buildings and land to be included in the town centre boundary are community facilities and offices apart from one hot food takeaway and a mini market. The representor has suggested no additional A1 uses. It is acknowledged that district town centres usually comprise of non retail use. However non retail uses are defined as banks, buildings societies, leisure uses and restaurants. Public facilities are also often found in district centres such as libraries. However, it is uncharacteristic for buildings such as fire stations, police stations, community centres and a petrol station to be within a town centre boundary.

The same approach adopted by the representor could be applied across all of the town centres to allow the town centre boundaries to include community facilities such as community centres, police stations, fire stations and petrol stations. However, this is not the purpose of the town centre boundary. The purpose of town centre boundaries is to protect shopping facilities and deliver thriving town centres.

In line with national planning policy, the town centre boundaries were reviewed as part of the LDP preparation to consolidate town centre boundaries by removing residential and vacant properties that were located on the edge of the centres to allow them to convert to other uses.

The future redevelopment of these suggested buildings and land within the proposed town centre boundary extension would be subject to policy DM7 which would place restrictions on their future use and would encourage a commercial / retail use which are suitable in the town centre.

Conclusion

The proposed extension to Blaina town centre is considered unsuitable.

Tests of Soundness

The Council considers that the LDP and associated documents have been prepared in a manner that fully accords with the requirements of the tests of soundness. The approach taken to preparing the LDP is detailed in the Council's soundness self-assessment documents.

Officer Recommendation

That the Council recommend to the Planning Inspector that no change be made to the LDP in respect of the representations.

Reason for Recommendation

To maintain the soundness of the Plan.

PART 3:
REPRESENTATIONS ON
SUSTAINABILITY
APPRAISAL AND HABITAT
REGULATION
ASSESSMENT

DEPOSIT PLAN CONSULTATION (2011)	
SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT	
Organisation/Comment	Response/Action
10. Countryside Council for Wales (CCW)	
<p>10D.563: Glossary The glossary is a user-friendly addition to the document that is very welcome. We would suggest two further additions to the glossary:- LSOA (from Table 3.3, under crime and social deprivation) Green Infrastructure</p>	Support welcomed and further additions added to glossary.
<p>10D.564: Paragraph 1.10 Sustainable Development CCW welcomes the reference to the international and national context for sustainable development, as well as the importance of land use planning to achieving this goal.</p>	Support Welcomed
<p>10D.565: Paragraph 1.45 Habitat Regulations Assessment CCW are pleased to see clear reference throughout the Report to the Habitat Regulations Assessment. Our response to the HRA Report is made in a separate response.</p>	Support Welcomed
<p>10D.566: Chapter 2.0 Sustainability Appraisal Methodology CCW commend the Authority on a very clear and informative chapter. However, CCW would like to see more detailed information about dealing with data gaps. Section 2.10 states that “recommendations for filling the gaps will be included in the proposals for monitoring the implementation of the Plan”. There is no further information about data gaps within the monitoring section of this Report (chapter 11). We seek further clarity about how data gaps will be dealt with.</p>	Agree. Further research into filling the data gaps will be included in the monitoring strategy. It is unnecessary to collate extra data at this stage as no further substantial appraisal work is to be undertaken.
<p>10D.567: Table 3.1 Broad Sustainability Themes Since this document was produced, additional policies, plans and programmes have been issued. When there is opportunity in future, CCW would recommend that reference is made to the following key strategies: Welsh Assembly Government ‘<i>Capturing the Potential: A Green Jobs Strategy for Wales</i>’, July 2009 Welsh Assembly Government ‘<i>Economic Renewal: a new direction</i>’, July 2010 Welsh Assembly Government ‘<i>Framework for Regeneration Areas</i>’, October 2010 Welsh Assembly Government emerging ‘A</p>	Noted. Additional PPPs will be added to review as necessary if further appraisal work is to be undertaken. At this stage, it is considered unnecessary as the PPP review was relevant to the appraisal work undertaken at the time.

DEPOSIT PLAN CONSULTATION (2011)	
SUSTAINABILITY APPRAISAL/STRATEGIC ENVIRONMENTAL ASSESSMENT	
Organisation/Comment	Response/Action
<p><i>National Strategy for Flood and Coastal Erosion Risk Management for Wales'</i> Welsh Assembly Government's emerging Natural Environment Framework – <i>A Living Wales</i> While the Welsh Assembly Government Climate Change Strategy (October 2010) is mentioned within the SAR (section 1.17), that document (and associated action plans) is not listed under the review of relevant Plans and Programmes.</p>	
<p>10D.568: Table 3.2 Potential cumulative effects and their causes CCW welcome the amendment to the entry for 'Habitat loss and fragmentation', which now lists a broader range of affected receptors, picking up on a comment made by CCW in our response to the Initial Sustainability Appraisal Report (December 2008).</p>	Support welcomed.
<p>10D.569: Table 3.3 Key sustainability issues/opportunities Under High car usage and CO2 emissions, the statement about ecological footprint does not make sense. While it is true that the footprint for Blaenau Gwent is low in a Welsh context, it still exceeds the fair earth share when applied globally. This means that the lifestyle of residents of Blaenau Gwent still exceeds the resources available from our one planet. As such, it is incorrect to state that the current footprint provides the opportunity for growth and development that will not have an effect on global resources. Under natural resources, landscape and biodiversity, the site name should read Cwm Merddog Woodlands. Under health, CCW would like to see mention of opportunities to link the environment to improved health outcomes (see also our previous responses dated December 2007 and December 2008).</p>	Agree. Revision to key sustainability issues to be made for clarity.
<p>10D.570: Table 3.3 Key sustainability issues/opportunities Table 3.3 lists those issues that "are considered to be a priority in terms of the sustainability of the plan area". Throughout subsequent chapters of this Report, a reduction in air quality is raised many times as a potentially significant effect of future development in Blaenau Gwent. As such, it is surprising to note that air quality is not found</p>	Disagree. The considerations in the report arise both from the identification of key sustainability issues as identified in the table, as well as the sustainability themes identified through the review of relevant plans and policies (Reduce air pollution and ensure improvements in air quality). The key sustainability issues and opportunities identified and the sustainability themes

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within the list of priority issues.	identified through the PP review have been brought together for the formulation of the SA Framework to form the basis of the assessment. Further, air quality is mentioned within other key sustainability issues and opportunities, including transport access constraints; health (in response to previous comment); crime and social deprivation; and high car usage and CO ₂ emissions. It is therefore considered that a separate commentary on air quality could be repetitive and is unnecessary for the purposes of assessment.
10D.571: Table 3.4 SA Framework SA 17 CCW appreciates that there is a balance to be struck between development on pre-existing (brownfield) sites and development on previously undeveloped (Greenfield) sites, subject to adequate assessment and appropriate mitigation. The target given for SA objective 17 is for <40% of all development to be on Greenfield land. CCW considers this figure to be far too high, particularly when considering the significant potential for development to take place on brownfield sites in the county borough (see also our response dated December 2008).	Agree. Amend to 80%.
10D.572: Paragraph 3.27 SA baseline data and trends CCW do not understand the meaning or context of the statement "CPRW has difficulty in understanding what is meant by sensitivity to change and does not find thresholds in this context an easy concept to grasp".	Agree. Clarity to be provided.
10D.573: Table 3.5 Baseline data and trends summary CCW welcomes inclusion of our previous comment (response dated December 2008) that the trend for biodiversity in Blaenau Gwent without the Plan would be stable at best.	Support welcomed.
10D.574: Table 3.6 Assessment rationale Objective 14 – it is unclear why there is a reference to the marine environment.	Agree. Clarity to be provided.
10D.575: Paragraph 4.5 Compatibility assessment findings CCW particularly welcomes the suggestion for provision of a Green Infrastructure network.	Support welcomed.
10D.576: Paragraph 4.8 Integration of	Disagree. It is suggested that this is

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<p>recommendations into the LDP</p> <p>It would be helpful to see the amendments highlighted. At the moment, it is not possible to work out what the amendments are without referring back to previous iterations of the document. CCW is encouraged to see that the SA process has significantly strengthened LDP objectives, especially objectives 10, 12 and 14.</p>	<p>unnecessary and would overcomplicate the report, as the consultee can clearly distinguish which objectives have been strengthened without the suggested change.</p>
<p>10D.577: Paragraph 5.17 Working towards a preferred option</p> <p>We feel that the main emphasis of this paragraph is fact that the SA process helps to identify the most sustainable option rather than the statement – “It is not the role of the SA to determine which of the options should be chosen as the basis for the preferred options. This is the role of those who have to decide which option is appropriate”.</p>	<p>Agree. Paragraph emphasis to be considered.</p>
<p>10D.578: Paragraph 5.20 Identification of the preferred option</p> <p>CCW would reiterate the concern raised in our response to the Initial Sustainability Appraisal Report (dated December 2008). Whilst the choice of preferred strategic option may be the most sustainable in terms of the overall Sustainability Appraisal objectives, it is not the most sustainable in terms of the core SEA objectives. We note that option 2 (the preferred option) is predicted to have unsustainable environmental effects and note also that, to improve sustainability, it is recommended that the following should be included in the LDP:-</p> <ul style="list-style-type: none"> • A green infrastructure network throughout the entire plan area, bringing multiple social and environmental benefits • Emphasis on reducing the need to travel by locating residential, employment and service functions within accessible distances • Prioritisation of the use of brownfield over Greenfield wherever possible 	<p>Disagree. The SA found option 2 to be the most sustainable option across the entire range of objectives included in the SA Framework, which is based on the PP review and identification of key sustainability issues and opportunities. Although the options appraisal found option 2 to be the most sustainable across the range of objectives, Section 5.21 already includes the recommendations as listed in this comment, which have been carried through the assessments and are included in the SA Framework for assessment of the LDP.</p>
<p>10D.579: Chapter 6.0 Development of strategic sites</p> <p>It has not been possible to consider all details relating to the assessment of the strategic sites because key information (particularly regarding mitigation for significant effects) is contained in a separate Sites Descriptions document, which is</p>	<p>Noted. Site detail to be included/ referred to in the SAR where relevant.</p>

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<p>an appendix to the LDP itself. While it is perfectly acceptable for large amounts of detail to be included in an appendix, there should be sufficient information within the Environment Report to enable comment on the full SA assessment. It is our belief that this is not the case here.</p>	
<p>10D.580: Table 6.5 Compatibility of sites with SA objectives We note that, for many of the site allocations, there is insufficient information for the SA objectives 18 (reduce GHG emissions), 19 (reduce waste generation) and 20 (maintain air quality). As stated, this means that there is the potential for significant negative environmental effects at these sites and we seek reassurance as to how this data uncertainty will be dealt with as assessment of the sites progresses. While many sites score positively for economic and social objectives, there are many significant negatives for core SEA objectives (environmental). For the 106 sites listed in Table 6.5, 68 sites score negatively against SA objective 14 (protection and enhancement of biodiversity), 40 score negatively for SA objective 16 (to make best use of previously developed land) and 65 sites score negatively for SA objective 24 (to conserve water quality). Mitigation for these significant negative effects is not given within the Environment Report but is detailed in a separate Sites Descriptions document. As such, CCW have not been able to make sufficiently detailed comment on mitigation as part of this SA consultation.</p>	<p>Agree. Data gaps exist for some data such as air quality and greenhouse gas emissions, as it was uncertain as to the potential effects of the site in relation to these objectives, as outcomes are dependent on a number of factors including the implementation of other policies in the plan including ones relating to sustainable transport. While the comment refers to a number of sites scoring negatively against the SA objectives (a 'red' score), only 10 of the sites carried forward were allocated a 'red' score. Sites carried forward are those with a colour on the left hand column (indicating the type of allocation in the site descriptions document). It is agreed, however, that for these sites, and the sites carried forward where insufficient information was available for the assessment, that this data is added into the SA tables.</p>
<p>10D.581: Chapter 7.0 Assessment of significant effects of the strategic policies CCW are concerned that potentially significant effects may have been missed within this chapter, which focuses only on the summary of a more detailed assessment given in Appendix J. The full assessment indicates effects over three time periods (short-term, medium-term and long-term), with a summary assessment that 'averages' over the three. This means that while a significant negative effect can be predicted for one of the 3 time periods, the summary assessment is not significant. This does not</p>	<p>Disagree. Although the SA Report provides a summary of the assessment, the assessment of effects has been fully considered in the recommendations arising from these assessments. Although not included in the chapter specifically, readers are referred to the appendices for further detail if they require additional information as to the reasoning behind the recommendations made in the main report (including the prediction of significant effects). Where a range of both positive and negative significant effects is predicted in the</p>

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seem to take a very precautionary approach to risk and raises the concern that potentially significant effects may have been missed in Chapter 7.	assessments, this is also recorded in the main report and included in the monitoring framework
<p>10: D.582: Chapter 8.0 Assessment of significant effects of Development Management, Allocations and Designations Policies</p> <p>CCW are concerned that potentially significant effects may have been missed within this chapter, which focuses only on the summary of a more detailed assessment given in Appendix K. The full assessment indicates effects over three time periods (short-term, medium-term and long-term), with a summary assessment that 'averages' over the three. This means that while a significant negative effect can be predicted for one of the 3 time periods, the summary assessment is not significant. This does not seem to take a very precautionary approach to risk and raises the concern that potentially significant effects may have been missed in Chapter 8.</p>	<p>Disagree. Although the SA Report provides a summary of the assessment, the assessment of effects has been fully considered in the recommendations arising from these assessments. Although not included in the chapter specifically, readers are referred to the appendices for further detail if they require additional information as to the reasoning behind the recommendations made in the main report (including the prediction of significant effects). Where a range of both positive and negative significant effects is predicted in the assessments, this is also recorded in the main report and included in the monitoring framework</p>
<p>10D.583: Retail theme (1)</p> <p>CCW notes the slight negative effect predicted for this policy against SA objective 18 (reduction of greenhouse gases). This is at odds with Appendix H (previous iteration of assessment) which predicted significant negative effects against SA objective 18 for the short, medium and long term. CCW would assess the potential effect as significant because increased retail provision will result in more people shopping and it is likely that many of these will use their own cars to do so. We would like to see more emphasis on mitigation, through policies DM1 (transport hierarchy) and SP6 (ensuring accessibility).</p>	<p>Agree. Assessment to be reviewed as adjusted as appropriate.</p>
<p>10D.584: Housing theme (2)</p> <p>The details of mitigation for these policies are found in the Sites Descriptions document. As such, we have not been able to review them adequately for this SA consultation (see also comments for Table 6.5). 8.21 We share the concern expressed that 3000 new dwellings will result in considerable trip generation, adding to GHG emissions and the likelihood of increased</p>	<p>Agree. Further recommendations to be included on mitigation as necessary.</p>

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waste generation. 8.23 We share the concerns raised about the likelihood of significant cumulative landscape effects as a result of development.	
10D.585: Accessibility theme CCW welcome the focus on provision of walking and cycling routes throughout the County Borough.	Support welcomed.
10D.586: Economy & employment theme The details of mitigation for these policies are found in the Sites Descriptions document. As such, we have not been able to review them adequately for this SA consultation (see also comments for Table 6.5).	Agree. Further recommendations to be included on mitigation as necessary.
10D.587: Paragraph 8.51 CCW again note the predicted significant negative effect for these policies on air quality. The development of employment sites (both town centre and non town centre locations) is likely to lead to increased trip generation and deterioration of air quality and no mitigation is given here. Indeed further road building is indicated to accommodate economic growth.	Agree. Further recommendations to be included on mitigation as necessary.
10D.588: Paragraph 8.53 CCW note that potential development at 2 major employment sites (Rhyd-y-Blew and Bryn Serth) conflicts with designation for biodiversity protection. We believe that the SA report for the Ebbw Vale Sustainable Development Framework is currently out for consultation and look forward to commenting in due course and working with BGCBC towards comprehensive mitigation for these sites.	Noted.
10D.589: Paragraph 8.59 CCW welcome the reference to the need for a strategic framework as an approach to maintaining and enhancing habitat linkages. CCW would encourage and support development of such a Framework.	Support welcomed.
10D.590: Natural environment theme CCW welcome this assessment of the policies linked to protection and enhancement of the natural environment and the recognition that longer-term economic prosperity is dependent on natural resources and the state of the ecological systems and services they provide.	Support welcomed

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<p>10D.591: Chapter 9.0 Cumulative, synergistic and indirect effects</p> <p>While CCW appreciates that this is one of the more difficult areas of the assessment to carry out, we feel that some of the potential effects have not been fully identified. For example, higher density of housing in designated urban settlements may make it increasingly difficult for accessible natural green space criteria to be met. See also comments in our previous response (dated December 2008). While cumulative negative effects of development on air quality have been picked up, we would suggest that the results of the SA assessments indicate the likelihood of cumulative effects of proposed levels of growth on greenhouse gas emissions as well. The potential for cumulative effects of proposed development on landscape have been picked up within the Environment Report (section 8.23) and should be mentioned here. Additionally, we have concerns about the cumulative effects of development on biodiversity (based on the fact that (1) 68 of the 106 site allocations score negatively for biodiversity under SA assessment and that (2) we have not seen details of mitigation because these were not included in the SA consultation).</p>	<p>Noted.</p>
<p>10D.592: Chapter 10.0 Mitigation</p> <p>Significant detail about mitigation is lacking from this Report, with much information to be found in a Sites Descriptions document (an appendix to the LDP). As such, CCW have not been able to make sufficiently detailed comment on mitigation as part of this SA consultation.</p>	<p>Agree. Further recommendations to be included on mitigation as necessary.</p>
<p>10D.593: Chapter 11.0 Monitoring</p> <p>With reference to our previous comments on monitoring (dated December 2008), we welcome the updated indicators and targets given.</p>	<p>Support welcomed.</p>
<p>10D.594: Appendix A – Consultation responses to SA iterations</p> <p>We welcome the consideration of our previous comments to the SA scoping document (response dated December 2007).</p>	<p>Support welcomed.</p>
<p>10D.595: Appendix B – Relevant Plans & Programmes</p> <p>Since this document was produced, additional</p>	<p>Agree. Additional PPPs will be added to review as necessary if further appraisal work is to be undertaken. At this stage, it is</p>

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<p>policies, plans and programmes have been issued. When there is opportunity in future, CCW would recommend that reference is made to the following key strategies:</p> <p>Welsh Assembly Government <i>'Capturing the Potential: A Green Jobs Strategy for Wales'</i>, July 2009</p> <p>Welsh Assembly Government <i>'Economic Renewal: a new direction'</i>, July 2010</p> <p>Welsh Assembly Government <i>'Framework for Regeneration Areas'</i>, October 2010</p> <p>Welsh Assembly Government emerging <i>'A National Strategy for Flood and Coastal Erosion Risk Management for Wales'</i></p> <p>Welsh Assembly Government's emerging Natural Environment Framework – <i>A Living Wales</i></p> <p>While the Welsh Assembly Government Climate Change Strategy (October 2010) is mentioned within the SAR (section 1.17), that document (and associated action plans) is not listed under the review of relevant Plans and Programmes.</p>	<p>considered unnecessary as the PPP review was relevant to the appraisal work undertaken at the time.</p>
<p>10D.596: Appendix H – Assessment of significant effects of development management, allocations, and designations policies</p> <p>See reference also to comments made under Chapter 8.</p> <p>Appendix H gives the full assessment details for the development management, allocations and designations policies (2010). This indicates assessment over three time periods (short-term, medium term and long-term), with a summary assessment that 'averages' over the three. This means that while a significant negative effect can be predicted for one of the 3 time periods, the summary assessment is not significant. This does not seem to take a very precautionary approach to risk and raises the concern that potentially significant effects may have been missed in Chapter 8, which only focuses on the summary assessment.</p>	<p>Disagree. Although the SA Report provides a summary of the assessment, the assessment of effects has been fully considered in the recommendations arising from these assessments. Although not included in the chapter specifically, readers are referred to the appendices for further detail if they require additional information as to the reasoning behind the recommendations made in the main report (including the prediction of significant effects). Where a range of both positive and negative significant effects is predicted in the assessments, this is also recorded in the main report and included in the monitoring framework</p>
<p>10D.597: Table K.2 – Theme 2: Housing</p> <p>We have concerns about the commentary given for SA objective 17 (soil) which states that "the quality of land in the borough is considered to be</p>	<p>Disagree. The assessment under this objective is based on the assessment rationale provided in table 3.6 of the main report. In combination with objective 16, this</p>

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low, so effects are unlikely to be significant". We are unclear as to what 'quality' measure is being referred to but would remind the Authority that land can have many different values attached to it in addition to agricultural classification. This includes value for biodiversity, open space and recreation, and can apply to brownfield as well as Greenfield.	objective seeks to utilise brownfield land with the lowest biodiversity value in the first instance. Other considerations such as open space are addressed under other SA objectives. The principle of the SA Framework is to not repeat assessments that are considered under alternative objectives, although it is accepted that there is a lot of overlap between them. They are not, however, considered in isolation, and an overall assessment summary is provided in the main report, taking an overall view of the findings.
10D.1040: SA 24 We welcome the inclusion of indicators suggested in our response dated December 2008.	Support welcomed.
10D.1041: SA25 We would also encourage consideration of indicators for noise and light under this objective.	Agreed. Indicators to be reviewed and updated as necessary within the monitoring framework.
10D.1042: Appendix E – Strategic Options Assessment We have previously commented on this assessment (response dated December 2008).	Noted.
10D.1043: Policy SP1 Northern Strategy Area CCW note the likely significant negative impacts on air quality as a result of increased density of emissions sources. We would like to see much clearer reference here to the mitigation of effects by linking to policies DM1 (transport hierarchy) and SP6 (ensuring accessibility).	Disagree. Policy SP1 was appraised in November 2008, with the subsequent iterations of the policy reflecting the recommendations made at this stage. As such, it is considered unnecessary to reference policies in the assessment that have since been modified. The overall sustainability of the plan is considered to have been improved. SP1 is a strategic policy and, as such, the requirements of policies DM1 and SP6 will not only be read as a whole with the rest of the LDP, but will be implemented through the site specific allocations.
10D.1044 Policy SP3 Retail hierarchy CCW note the predicted significant negative effect for this policy on water quality (SA objective 24). No mitigation has been proposed as "the effects are considered likely to be localised". We seek reassurance as to how the "potential for pollutants to enter the water system" will be dealt with.	Disagree. This strategic policy was appraised in 2008, and changes were subsequently made, as described in chapter 7 of the SA Report. As a strategic policy, specific mitigation in relation to pollution of water resources will be addressed through the site allocations and development management policies as well as strategic

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	policy SP10. As the LDP is designed to be read as a whole, it would not be appropriate to include such requirements in every policy.
10D.1045: Policy SP7 Climate Change CCW welcome this strategic policy SP7 which did not appear in the 2008 iteration of the Plan and is a result of SA recommendations. We also welcome reference to the Blaenau Gwent Renewable Energy Assessment (section 7.52).	Support welcomed.
10D.1046: Policy SP8 Sustainable Economic Growth CCW note the likely significant negative impacts on air quality as a result of increased density of built development, processes and transportation. We would like to see much clearer reference here to the mitigation of effects by linking to policies DM1 (transport hierarchy) and SP6 (ensuring accessibility).	Agree. Assessment to be updated.
10D.1047: Policy SP10 Protection and enhancement of the natural environment CCW welcome the assessment of the policy but would also like to see recognition of the benefits of an improved natural environment for residents of the county borough (as well as visitors).	Agree. Assessment to be updated.
10D.1048: Policy SP12 Securing an adequate supply of minerals CCW note the predicted significant negative effect on the SA landscape objective (25).	Noted.
46. Brecon Beacons National Park Authority	
46D.304 We note that page 57 of the Sustainability Appraisal Report (under appreciation and protection of natural resources, landscape and biodiversity value, recognises the proximity of the National Park boundary. We also note the reference to the NERC duty in the implications for Plan policy. We suggest that inclusion of the s62(2) duty in the SAR may enable appropriate screening of the LDP policies as suggested above.	Agree. To be added to report where appropriate. The text of the provision ¹ is prospective. Therefore it is considered inappropriate to make changes to the SA while changes are being put in place to the legislation. Further section 62 refers to expenditure by local parks. As such, it is unclear how this is relevant to the LDP policies in this context.
80. Ian Roberts Consultancy	

¹ <http://www.legislation.gov.uk/ukpga/2006/16/section/62>

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<p>80D.561 The SA/SEA document has missed the opportunity for fully considering Ty Pwdr land for either residential development or for Live/Work development. Given the sites previous planning permission for residential development on an extensively larger tract of land, the reduced site could provide a different house stock that would complement the community. This would provide the catalyst for ensuring the vitality and viability of the nearby town centre, local shops, sustainable travelling and the character of the locality.</p>	<p>Disagree. Planning applications for development will be considered under the policies of the LDP once it is adopted.</p>
<p>80D.1049 Moreover, the document has failed to address national policy with regard to Live/Work development. This omission has undermined the credence of the document and should be considered not only for Ty Pwdr land but the remainder of the borough.</p>	<p>Disagree. It is not the role of the LDP to repeat national policy. If live/work units were to be proposed these would be considered under the same policy guidance as all other development.</p>

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10. Countryside Council for Wales (CCW)	
<p>10D.543 1 Executive summary We note the summary and conclusions of this assessment and the recommended mitigation measures. See below for detailed comments. It should be noted, however, that the mitigation measures identified in the Executive Summary do not appear to be consistent with the measures identified in the main body of the report including specific policy references (we assume reference to 'DM13' should be DM15 or DM16). Therefore, we would strongly recommend that, to avoid confusion, this section is amended so that it is in line with the conclusions and recommendations of sections 8.2 and 9.2 and appendix C.</p>	<p>Agree. The Executive Summary will be amended in line with the mitigation measures set out in the main body of the report.</p>
<p>10D.544 2 Introduction <i>2.4 Consultation.</i> CCW welcomes the strongly iterative approach taken by Blaenau Gwent and their consultants Capita Symonds in the preparation of this assessment. We particularly welcome the efforts made to incorporate our previous comments and particularly the work done to clarify some of our key concerns over water resources and potential impacts on the River Usk and River Wye SACs.</p>	<p>Support welcomed.</p>
<p>10D.545 7 The Appropriate assessment We note and largely agree with the conclusions of the policy and allocation assessments set out in tables 3 – 22. However, we also note that there are a number of potential impacts on the Usk Bat Sites SAC identified for allocations particularly around the north of the County Borough. While we appreciate that the mitigation proposed and included in DM15 to address potential impacts of development on the movement of the lesser horseshoe bat feature of this site is appropriate for general development proposals, it may not be sufficient to address the cumulative impacts</p>	<p>Agree. The Survey Requirements Table in the Delivery and Implementation Chapter be expanded to include further allocations. However, it is not possible to include Transport Proposals as this level of information is not available. It is recommended to the Inspector that the table is also to be expanded to include another column identifying where a HRA assessment is required. An additional caveat will also be added to the site descriptions document to ensure there is adequate bat provision for bat movement /commuting routes for these developments.</p>

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<p>that may result from these allocations (specifically MU1, EMP1.5 and EMP1.8) particularly in combination with proposals such as the A465 dualling (T6.1). We would, therefore, recommend that additional caveats are included within the relevant allocation details in chapter 9 to ensure that there is adequate provision for bat movement /commuting routes for these developments.</p>	
<p>10D.546 7 The Appropriate assessment <i>7.4 Appropriate assessment of the River Usk SAC</i> We note the further clarification provided by Dwr Cymru Welsh Water (DCWW) in relation to the sources of water for the potential increase in development proposed by the Blaenau Gwent LDP. Importantly, in terms of this element of the assessment, DCWW state that the sources of supply are not designated sources under the Habitats Directive, which we understand to mean that any increase in demand would not lead to adverse effects on the River Usk SAC (or River Wye SAC). Given this assurance, we accept the assessment conclusion that there will be no adverse effects on the River Usk SAC as a consequence of the development proposed in the Blaenau Gwent LDP. However, we would still welcome a clear statement that any development proposed by the Plan would only be permitted if it could be shown that there were no likely significant effects on local or regional water resources, as set out in section 9.2.</p>	<p>Agree. Policy DM3 already requires that development proposals do not have an adverse impact upon the water environment or pose an unacceptable risk to the quality of controlled waters (including groundwater and surface water). However, it is recommended to the Inspector that an additional sentence be added to the reasoned justification of policy SP10 as requested.</p> <p><i>Development will not be allowed if it is demonstrated that there is likely to be adverse impact on the water resources, both locally and regionally.</i></p>
<p>10D.547 7 The Appropriate assessment <i>7.5 Assessment of 'in combination' impacts.</i> We welcome the comprehensive and clear assessment of possible 'in combination' effects and the precautionary approach taken towards mitigation of possible effects. However, the table would have benefited from further clarification of which of the mitigation measures identified by the Assessment applied in each case. This would enable straightforward links to the</p>	<p>Agree. Add a further column to the table indicating which policies apply in each case.</p>

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<p>monitoring strategy to be made to ensure that the Plan is performing as expected.</p>	
<p>10D.548</p> <p>8.0 Mitigation Measures</p> <p>We note the 8 strategic policies and 22 proposed allocations identified as likely to have a significant effect. We appreciate that this is a precautionary assessment and, therefore, welcome the policy clarifications identified to avoid, cancel and reduce any potential adverse effects that may occur, specifically the amendment to Policy DM15 and SP10 which now specifically mention European and international sites. However, we would recommend further clarifying section 6.68 of the supporting text of SP10 to ensure there is no confusion over the application of appropriate policy in relation to development and European and international sites.</p> <p>In addition, where a policy is intended to function as mitigation for likely significant effects identified in this assessment, it should be clearly identified as such both in the assessment, the Monitoring Strategy and, where applicable, in the Plan itself, for example, SP7 (Climate Change), DM1 (sustainable design), DM3 (Air and water pollution) and DM16 (protection and enhancement of green infrastructure).</p> <p>We also strongly recommend that additional caveats are included within the relevant allocation details in chapter 9 to ensure that there is adequate provision for bat movement/commuting routes for these developments in MU1, EMP1.5 and EMP1.8.</p> <p>All these measures should also be accurately reflected in the executive summary. Finally, we welcome the proposals to enable analysis of the effectiveness of the proposed mitigation measures but while we accept that some of these are reflected in the Monitoring Strategy, we feel others need to be further clarified as outlined above.</p>	<p>Agree. Recommend to the Inspector that a sentence be added to paragraph 6.68 of the Plan to ensure there is no confusion over the application of appropriate policy in relation to development and European and international sites.</p> <p><i>In accordance with the Habitats Directive (Council Directive 92/43/EEC) development will not be permitted where it adversely affects the integrity of these sites.</i></p> <p>Agree. It is recommended to the Inspector that two new monitoring measures are included under SP10 on air and water quality.</p> <p>Agree. It has already been agreed to include a reference in the site descriptions document.</p> <p>Agree. The Executive Summary will be amended in line with these changes.</p>

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<p>10D.549</p> <p>9 Conclusions</p> <p>We note the conclusions and, providing the recommendations set out in section 9.2 and 9.3 are implemented and the minor clarifications outlined above are addressed, particularly the suggested amendment of allocations to the North of the County Borough then we agree with the assessment conclusions that the Blaenau Gwent LDP is not likely to have any adverse effects on the sites identified.</p>	<p>Noted.</p>
18. Environment Agency Wales	
<p>18D.792</p> <p>In general, we support the findings of the Habitat Regulation Assessment (HRA). However, whilst the assessment concludes that any potential environmental impacts identified can be mitigated for, it is not clear in the policies what the specific mitigation measures required are. We advise that the HRA clearly identifies, within the HRA tables or individual sections, the mitigation measures required to prevent negative impacts to the environment from any future development.</p>	<p>Agree. It has already been agreed to add a column to table 7.3 to address this issue.</p>

PART 4: NOT DULY MADE REPRESENTATIONS

REPRESENTATIONS TO THE DEPOSIT LDP AND ALTERNATIVE SITES STAGE THAT ARE NOT DULY MADE

121 representations were not duly made at the Deposit Plan stage as they were submitted after the consultation deadline and are shown below in Plan order. All representations submitted at the alternative site stage were made during the consultation deadline.

DEPOSIT STAGE

Policy Representations

No	Name/Organisation	Comment
Context and Challenges		
92D.414	Gwent Wildlife Trust	There is an opportunity to promote the use of the natural environment in combating long-term illness in the Context and Challenges Section.
Vision and Objectives		
92D.415	Gwent Wildlife Trust	Objective 6 There is opportunity in this section to highlight how green infrastructure will help reduce the risk of flood and carbon emissions.
92D.416	Gwent Wildlife Trust	Objective 13 A stronger more committed statement should replace this one.
Strategic Policies		
88D.408	Mr William Dearth – W.W.D. Enterprises Ltd	Need to look at Retailing and Business in Tredegar Town by spending money or funding. The more we do the more jobs there are for the people of Tredegar.
Development Management Policies		
92D.417	Gwent Wildlife Trust	DM1. The policy should make reference to the “A Living Wales – a new framework for our environment, our countryside and our seas” document to incorporate the needs of wildlife.
92D.418	Gwent Wildlife Trust	DM1. Cycle/walking routes offer a dual purpose of acting as ecological corridors for wildlife and should be managed to do so where possible.
92D.419	Gwent Wildlife Trust	DM15. There should be clearer reference to the need for future management and post-monitoring of sites that are impacted by development which will enable developers to formulate an appropriate strategy early on.
92D.420	Gwent Wildlife Trust	DM15. How do you accurately measure if the need for development outweighs nature conservation? The statement is vague and difficult to interpret; clarity is needed to provide guidance for

		planners and developers.
90D.412	MONO Consultants Lt	Suggesting that a clear and flexible telecommunications policy be introduced in the Local Development Plan. This should be introduced by a short paragraph outlining the development pressures and the Councils policy aims.

Site Representations

No	Name/Organisation	Comment
Retail		
92D.466	Gwent Wildlife Trust	R1.1 No objection to development but comments for D462 MU1 could also impact this site.
92D.467	Gwent Wildlife Trust	R1.2 No objection to development of this site.
92D.468	Gwent Wildlife Trust	R1.3 No objections to development of this site.
92D.469	Gwent Wildlife Trust	R1.4 No objections to development of this site.
92D.464	Gwent Wildlife Trust	AA1.1 No objections to development
92D.465	Gwent Wildlife Trust	AA1.2 No objection to development of this site.
Mixed Use Sites		
92D.462	Gwent Wildlife Trust	MU1 Object to development of part of this site namely the Bryn Serth SINC and the grassland and trees south of Rhyd y Blew pond. These are historically important sites for Lapwing. Parts of the corridor are designated as a SINC for mosaic habitat.
92D.463	Gwent Wildlife Trust	MU2 No objections to the development of site.
91D.413	RPS Planning	MU3 MU3 should afford additional flexibility in terms of land uses required to secure comprehensive re-development of the site in a suitable manner eg refer to retail uses within Use Class A1 and promote site in a phased manner.
92D.438	Gwent Wildlife Trust	MU3 No objection to development but we would expect the protection of the adjacent SINC to be ensured.
Housing Allocations		
92D.470	Gwent Wildlife Trust	H1.1 No objection to development of this site.
92D.501	Gwent Wildlife Trust	H1.2 No objections to development at this site

92D.502	Gwent Wildlife Trust	H1.3 No objections to development of this site however we would expect any features of biodiversity interest to be retained namely the hedgerow to the south and any mature trees.
92D.503	Gwent Wildlife Trust	H1.4 No objections to the development of this site.
92D.504	Gwent Wildlife Trust	H1.5 No objections to the development of this site.
92D.505	Gwent Wildlife Trust	H1.6 No objections to the development of this site, however we would expect the development of the woodland to the west of the site.
92D.439	Gwent Wildlife Trust	H1.7 No objection to development at this site but would expect any mature trees to be retained and protected within development.
92D.440	Gwent Wildlife Trust	H1.8 No objections to development but would expect any mature trees to be retained and protected within development of site
92D.441	Gwent Wildlife Trust	H1.9 No objections to development of this site.
92D.442	Gwent Wildlife Trust	H1.10 No objections to development but would expect mature trees to be retained and protected within the development.
92D.443	Gwent Wildlife Trust	H1.11 No objection to development of this site.
92D.444	Gwent Wildlife Trust	H1.12 No objection to development of this site.
92D.445	Gwent Wildlife Trust	H1.13 No objection to development of this site.
92D.421	Gwent Wildlife Trust	H1.14 No objection however we would expect the local nature reserve to be retained and protected within the development.
92D.422	Gwent Wildlife Trust	H1.15 Objects to the site which overlaps the local nature reserve. We expect the nature reserve to be retained and protected within the development.
92D.423	Gwent Wildlife Trust	H1.16 No objection but would expect the retention and protection of any mature trees.
92D.424	Gwent Wildlife Trust	H1.17 No objections to this site being developed.
92D.425	Gwent Wildlife Trust	H1.18 No objections to development but would expect the adjacent SINC to be protected during and post development

92D.426	Gwent Wildlife Trust	H1.19 Have no objections to development but would expect the development to protect any features of biodiversity interest.
92D.427	Gwent Wildlife Trust	H1.20 Object to development of part of this site because of Cefn Bach SINC grasslands to the East.
262D.1079	David Palmer	H1.5 Would object to housing as this would increase noise, pollution and traffic and would not maintain the ambience of the village.
Housing Commitments		
92D.471	Gwent Wildlife Trust	HC1.1 No objections to development of site.
92D.472	Gwent Wildlife Trust	HC1.2 No objections to development of this site but expect any mature trees to be retained and protected.
92D.473	Gwent Wildlife Trust	HC1.3 No objections to development but grassland and trees form an ecological corridor which should be retained and Ebbw River SINC should be protected.
92D.474	Gwent Wildlife Trust	HC1.4 No objections to development but would expect any features of biodiversity interest to be retained and protected.
92D.475	Gwent Wildlife Trust	HC1.5 No objections to development of this site.
92D.476	Gwent Wildlife Trust	HC1.6 No objections to development of site but expect any features of biodiversity interest such as mature trees to be retained and protected.
92D.477	Gwent Wildlife Trust	HC1.7 No objections to development however the woodland and grassland form part of the ecological connectivity feature which should be retained and protected.
92D.478	Gwent Wildlife Trust	HC1.8 No objections to development however we would expect the integrity of the adjacent SINC to be protected.
92D.479	Gwent Wildlife Trust	HC1.9 No objection to development however the site acts as a connectivity feature in the landscape, an ecological corridor should be retained.
92D.480	Gwent Wildlife Trust	HC1.10 No objection to development of this site.

92D.506	Gwent Wildlife Trust	HC1.11 No objections to the development of this site.
92D.507	Gwent Wildlife Trust	HC1.12 No objections to the development of this site.
92D.508	Gwent Wildlife Trust	HC1.13 No objections to the development of this site.
92D.509	Gwent Wildlife Trust	HC1.14 No objection to the development of this site however we would expect any features of biodiversity interest namely grassland and trees to be retained and protected within the development.
92D.510	Gwent Wildlife Trust	HC1.15 No objections to development at this site however we expect the protection of biodiversity within the landscape area to the north of the site.
92D.511	Gwent Wildlife Trust	HC1.16 No objection to the development of this site.
92D.512	Gwent Wildlife Trust	HC1.17 No objection to the development of this site however we expect the development to retain and protect any features of biodiversity interest.
92D.513	Gwent Wildlife Trust	HC1.18 No objection to the development of this site.
92D.514	Gwent Wildlife Trust	HC1.19 No objection to the development of this site however we expect the grassland to be retained and protected within the development.
92D.515	Gwent Wildlife Trust	HC1.20 No objections to development of this site but expect any mature trees to be retained and protected.
92D.516	Gwent Wildlife Trust	HC1.21 No objection to the development of this site but we would expect development to retain any features of biodiversity interest namely mature trees.
92D.517	Gwent Wildlife Trust	HC1.22 We object to development of this site which is made up of Sheepfold SINC grasslands. Although half has been granted Planning Permission we expect the other half to be managed for nature conservation.
92D.446	Gwent Wildlife Trust	HC1.23 No objections to development of this site.
92D.447	Gwent Wildlife Trust	HC1.24 No objection to development at this site.
92D.448	Gwent Wildlife Trust	HC1.25

		No objection to development at this site, however would expect any development to retain any features of biodiversity interest namely mature trees.
92D.449	Gwent Wildlife Trust	HC1.26 No objection to the development of this site.
92D.450	Gwent Wildlife Trust	HC1.27 No objections to development however would expect features of biodiversity interest to be retained and protected within development i.e. mature trees etc
92D.451	Gwent Wildlife Trust	HC1.28 No objection to development at this site.
92D.428	Gwent Wildlife Trust	HC1.29 No objections to development but would expect the adjacent woodland to be protected within the development.
92D.429	Gwent Wildlife Trust	HC1.30 No objections to development of this site.
92D.430	Gwent Wildlife Trust	HC1.31 No objections to development, however the site acts as a connectivity feature in the landscape. An ecological corridor should be retained within development.
Transport		
92D.481	Gwent Wildlife Trust	T2.3 No objections to development.
92D.452	Gwent Wildlife Trust	T4.2 No objections to development
92D.453	Gwent Wildlife Trust	T6.1 Duelling of the HOV A465 will result in a substantial loss of biodiversity, we expect robust mitigation strategies to compensate for the loss.
Employment Allocations		
92D.487	Gwent Wildlife Trust	EMP1.1 No objection to development of this site
92D.518	Gwent Wildlife Trust	EMP1.2 No objection to the development of this site but expect features of biodiversity interest to be protected and enhanced namely mature trees and adjacent Sirhowy River SINC.
92D.454	Gwent Wildlife Trust	EMP1.3 No objection to development but would expect mature trees to be retained and protected.
92D.488	Gwent Wildlife Trust	EMP1.4 Objection to development of part of this site namely the marshy grassland. This is of potential SINC value and acts as a flight line for bats linking to the Usk Bat SAC.

92D.489	Gwent Wildlife Trust	EMP1.5 Objection to development of part of this site namely the marshy grassland and some areas of forestry plantation. This is of potential SINC value and acts as a flight line for bats linking to the Usk Bat SAC.
92D.490	Gwent Wildlife Trust	EMP1.6 No objections to development however we would expect features of biodiversity interest to be retained and protected. Development should not impact the lakes which are designated as SINC's and the adj woodland LNR.
92D.491	Gwent Wildlife Trust	EMP1.7 No objections to development of site however the Ebbw River SINC to the west should be protected in development.
92D.519	Gwent Wildlife Trust	EMP1.8 No objection to the development of this site however would expect development to retain any features of biodiversity interest.
92D.520	Gwent Wildlife Trust	EMP1.9 No objection to the development of this site however would expect development to retain any features of biodiversity interest.
92D.431	Gwent Wildlife Trust	EMP1.10 No objections to development but would expect any features of biodiversity interest such as mature trees to be retained and protected within development.
Employment Area Protection		
92D.432	Gwent Wildlife Trust	EMP2.1 No objection to development but would expect the adjacent Sirhowy River SINC and mature trees to be protected within development.
92D.529	Gwent Wildlife Trust	EMP2.2 Objection to development of part of this site namely the plot of land to the south which supports lapwings.
92D.492	Gwent Wildlife Trust	EMP2.3 No objections to development of site, however would expect the features of biodiversity interest to be retained and protected namely the grassland and any mature trees, development should not impact the adjacent woodland LNR.
92D.493	Gwent Wildlife Trust	EMP2.4 No objection to development of site however would expect the woodland and any grassland of value to wildlife to be retained

		and protected within development.
92D.521	Gwent Wildlife Trust	EMP2.5 No objection to the development of this site.
92D.522	Gwent Wildlife Trust	EMP2.6 No objection to the development of this site however would expect development to retain any features of biodiversity interest.
92D.455	Gwent Wildlife Trust	EMP2.7 No objections to development of this site.
92D.456	Gwent Wildlife Trust	EMP2.8 No objections to development however would expect the woodland to be retained and protected.
92D.457	Gwent Wildlife Trust	EMP2.9 No objection to development of this site.
92D.458	Gwent Wildlife Trust	EMP2.10 No objection to development of this site but would expect the grassland to be retained and protected.
92D.433	Gwent Wildlife Trust	EMP2.11 No objection to development but would expect any mature trees to be retained within development.
92D.434	Gwent Wildlife Trust	EMP2.12 No objection to development but would expect the Western strip of woodland to be retained and protected within development.
92D.494	Gwent Wildlife Trust	EMP2.13 No objections to development of site however the grassland and trees form an ecological corridor and should be retained and we expect the pond to be enhanced and protected.
92D.495	Gwent Wildlife Trust	EMP2.14 No objections to development of site however would expect the protection of Ebbw River SINC to the west of the site.
92D.523	Gwent Wildlife Trust	EMP2.15 No objection to the development of this site.
92D.524	Gwent Wildlife Trust	EMP2.16 No objection to the development of this site however would expect any mature trees around the edge of the site to be retained and protected.
92D.459	Gwent Wildlife Trust	EMP2.17 No objections to development but would expect the protection of the adjacent SINC.
92D.460	Gwent Wildlife Trust	EMP2.18 No objections to development at this site.
92D.461	Gwent Wildlife Trust	EMP2.19 No objections to development however would

		expect mature trees to be retained and protected within development.
92D.435	Gwent Wildlife Trust	EMP2.20 No objection to development however would expect the protection of the Ebbw River SINC to the west of the site.
92D.436	Gwent Wildlife Trust	EMP2.21 No objections to development of site.
Community Facilities		
92D.525	Gwent Wildlife Trust	CF1.1 No objections to development of this site.
Tourism and Leisure		
92D.482	Gwent Wildlife Trust	TM1.1 No objections to development however we would expect any features of biodiversity interests to be retained and protected Garn-Cam-Isaf SINC and design and siting would need to be sensitive to features contained within the SINC
92D.483	Gwent Wildlife Trust	TM1.2 No objection to development but would expect any features of biodiversity interest to namely ponds mature trees and grassland to be retained and protected and design and siting to be sensitive to SINC's contained within site.
92D.484	Gwent Wildlife Trust	TM1.3 No objections to development however the lakes are designated as a SINC so design and siting of facilities need to be sensitive to the features of the SINC.
92D.526	Gwent Wildlife Trust	TM1.4 No objection to development at this site however we expect any biodiversity features namely ponds mature trees and any grassland to be retained and protected.
92D.437	Gwent Wildlife Trust	TM1.7 No objections to the development of this site.
Formal leisure Facilities		
92D.527	Gwent Wildlife Trust	L1.1 No objection to the development of this site.
Safeguarding of Minerals		
92D.496	Gwent Wildlife Trust	M4.1 Objections to this site, it supports a mosaic of acid grassland wet and dry heath supporting a number of important species.
92D.497	Gwent Wildlife Trust	M4.2 Objections to development at this site which is a SINC. It supports bat roosts and is important for breeding birds and dragonflies.
92D.498	Gwent Wildlife Trust	M4.3

		Objections to development of site which contains a number of SINC's. It is made up of a mosaic of habitats including acid grassland, heath and Craig y Deri pond
Waste		
92D.499	Gwent Wildlife Trust	W1.1 No objections to development of site however we expect the features of biodiversity interest to be retained and protected. Any development should not impact on the lakes which are designated.
92D.500	Gwent Wildlife Trust	W1.2 No objections to development of site for waste management.

Settlement Boundary Representations

SB1		
89D.411	Mr Phillip Wayne Bull	Amend settlement boundary to include land opposite Garnddu Farm, Tredegar. The site should be given planning permission as there does not appear to be any unsound findings within the sustainability appraisal. There was previously a dwelling on this site.

Alternative Sites

New Sites		
261D.1076	RSPB	AS (N) 02 Concerns as this site is part of the Beaufort Hills breeding Lapwing Site.
261D.1077	RSPB	AS (N) 03 Concerns as this site is part of the Beaufort Hills breeding Lapwing Site.
261D.1078	RSPB	AS (N) 04 Concerns as this site is part of the Beaufort Hills breeding Lapwing Site.

APPENDIX 1

Delivery and Implementation –
Survey Requirements for Allocations

APPENDIX 1

SURVEY REQUIREMENTS FOR ~~ALL HOUSING, EMPLOYMENT and RETAIL~~ ALLOCATIONS

The table below indicates the surveys that have been highlighted through the candidate site assessment process. These should be undertaken on a site by site basis and submitted to the Local Planning Authority as part of any future planning application. It should be noted that the surveys listed with the Appendix are in addition to any other surveys that may arise from polices contained in the Plan such as design and access statements.

Where sites already have the benefit of planning consent, the information necessary to determine the application will already have been submitted to the Local Authority. However, in the event of any future applications or renewals of planning consent, it may be necessary for additional survey information to be submitted to reflect changing circumstances and planning guidance. Developers are therefore advised to enter into pre-application discussions with the Local Authority to determine whether additional surveys will be required.

Policy Number	Site Name	Planning Consent	Transport Assessment	TAN 11 Noise Assessment	BS4142 Noise Assessment	Noise Assessment	BS5387 Tree Survey	Full ecological survey including trees and significant vegetation	Biodiversity Constraints and Enhancement Plan	Flood Consequences Assessment	Ground Investigation Preliminary Risk Assessment	Project Level Habitat Regulation Assessment
MU1 Mixed Use Allocations												
MU1	Ebbw Vale Northern Corridor	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
MU2	The Works	✓										
MU3	NMC Factory and Bus Depot		✓					✓	✓			
R1 Retail Allocations												
R1.4	Market Street, Ebbw Vale				✓		✓				✓	

Policy Number	Site Name	Planning Consent	Transport Assessment	TAN 11 Noise Assessment	BS4142 Noise Assessment	Noise Assessment	BS5387 Tree Survey	Full ecological survey including trees and significant vegetation	Biodiversity Constraints and Enhancement Plan	Flood Consequences Assessment	Ground Investigation Preliminary Risk Assessment	Project Level Habitat Regulation Assessment
H1 Housing Allocations												
H1.1	Willowtown School, Ebbw Vale							✓	✓		✓	
H1.2	Cartref Aneurin Bevan, Tredegar						✓	✓	✓			
H1.3	Greenacres, Tredegar						✓	✓	✓		✓	
H1.4	Jesmondene Stadium, Cefn Golau		✓					✓	✓		✓	
H1.5	Business Resource Centre, Tafarnaubach			✓			✓	✓	✓		✓	
H1.6	Adj Chartist Way, Tredegar		✓				✓	✓	✓		✓	
H1.7	Garnfach School, Nantyglo						✓	✓	✓			
H1.8	Crawshay House, Brynmawr						✓	✓	✓			
H1.9	Infants School & Old Griffin Yard, Brynmawr						✓	✓	✓		✓	
H1.10	Hafod Dawel Site, Nantyglo	✓										
H1.11	West of the Recreation Ground, Nantyglo							✓	✓		✓	
H1.12	Land to the East of Blaina Road, Brynmawr						✓				✓	
H1.13	Land to the North of Winchestown, Nantyglo							✓	✓		✓	
H1.14	Six Bells Colliery Site, Six Bells						✓	✓	✓		✓	
H1.15	Warm Turn, Six Bells			✓		✓	✓	✓	✓		✓	
H1.16	Roseheyworth Comprehensive, Abertillery						✓	✓	✓			
H1.17	Former Mount Pleasant Court, Brynithel#						✓	✓	✓		✓	
H1.18	Hillcrest View, Cwmtillery#	✓										
H1.19	Quarry Adj to Cwm Farm Road, Six Bells						✓	✓	✓		✓	
H1.20	Land at Farm Road, Swffryd		✓					✓	✓			

Policy Number	Site Name	Planning Consent	Transport Assessment	TAN 11 Noise Assessment	BS4142 Noise Assessment	Noise Assessment	BS5387 Tree Survey	Full ecological survey including trees and significant vegetation	Biodiversity Constraints and Enhancement Plan	Flood Consequences Assessment	Ground Investigation Preliminary Risk Assessment	Project Level Habitat Regulation Assessment
GT1 Gypsy and Traveller Allocation												
GT1	Cwmcraehen Gypsy and Traveller Site					✓	✓				✓	
EMP1 Employment Allocation												
EMP 1.1	Land at Festival Park					✓		✓	✓		✓	
EMP 1.2	Land at Tredegar Business Park				✓			✓	✓		✓	
EMP 1.3	Land at Rising Sun Industrial Estate				✓			✓	✓	✓	✓	
EMP 1.4	Rassau Platform A					✓		✓	✓		✓	
EMP 1.5	Rassau Platform B					✓		✓	✓		✓	✓
EMP 1.6	Land at Waun-y-Pound					✓		✓	✓	✓	✓	
EMP 1.7	Marine Colliery					✓		✓	✓	✓	✓	
EMP1.8	Crown Business Park Platform A				✓			✓	✓		✓	✓
EMP 1.9	Crown Business Park Platform B							✓	✓		✓	
EMP 1.10	Land at Roseheyworth Business Park					✓		✓	✓	✓	✓	
R1.4	Market Street, Ebbw Vale				✓		✓				✓	
ED1 Education Facility Allocation												
ED1.2	Lower Plateau Six Bells Colliery Site					✓		✓	✓	✓	✓	
CF1 Community Centre Allocation												
CF1	Former Sirhowy Infants School	✓										
TM1 Tourism and Leisure Allocation												
TM1.1	Eastern Valley Slopes					✓	✓	✓	✓			
TM1.2	Garden Festival					✓	✓	✓	✓		✓	
TM1.3	Blue Lakes					✓	✓	✓	✓			

Policy Number	Site Name	Planning Consent	Transport Assessment	TAN 11 Noise Assessment	BS4142 Noise Assessment	Noise Assessment	BS5387 Tree Survey	Full ecological survey including trees and significant vegetation	Biodiversity Constraints and Enhancement Plan	Flood Consequences Assessment	Ground Investigation Preliminary Risk Assessment	Project Level Habitat Regulation Assessment
TM1.4	Bedwellty House and Park	✓										
TM1.5	Parc Bryn Bach (including a hotel)					✓	✓	✓	✓			
TM1.6	Nantyglo Roundhouse and Towers					✓	✓	✓	✓			
TM1.7	Cwmtillery Lakes						✓	✓	✓		✓	
M4 Preferred Areas												
M4.1	Trefil Quarry			✓	✓		✓	✓	✓			
M4.2	Tir Pentwys Tip			✓	✓		✓	✓	✓			
M4.3	Land South East of Cwm			✓	✓		✓	✓	✓			
W1 Land for Waste Management												
W1.1	Land south of Waun y Pound					✓		✓	✓	✓	✓	
W1.2	Silent Valley							✓	✓			

APPENDIX 2

Monitoring Framework

APPENDIX 1 – MONITORING FRAMEWORK

Monitoring is a fundamental part of the LDP process. It provides an opportunity for the implementation and effectiveness of planning policies to be assessed, and forms the basis for review of the Plan, where necessary. The LDP is subject to a 4-year review period.

WAG guidance requires that local authorities prepare an Annual Monitoring Report (AMR) to be submitted each year. The AMR assesses the effectiveness of policies in the LDP against various indicators and targets, identifies any significant contextual changes that have taken place, highlights any policies which are not functioning effectively and seeks to rectify any gaps in monitoring or data collection.

The AMR is the principal mechanism through which the implementation of policies in the LDP is measured and ensures that policies are based on up-to-date evidence.

The Monitoring Framework sets out the mechanism by which the implementation of the Policies and Plan Strategy will be assessed. However, the LDP Manual advises that it is not appropriate for every Policy to be monitored. The Monitoring Framework proposes to monitor the LDP Strategy. It makes sense to monitor the Policies that have been included in the Plan specifically for the purpose of realising the Strategy i.e. the Strategic Policies. These are also the point from which the Development Management Policies and Allocation Policies are derived. The successful implementation of the Development Management Policies and Allocation policies will assist in realising the Strategy and therefore the Strategy Policies provide a reasonable gauge of how other Policies are fairing and whether there are any Policies not being implemented.

The Monitoring Framework comprises the following items:

Monitoring Aim:

This sets the outcome the Strategic Policy is aiming to deliver.

Indicator:

An indicator is the measure used to monitor the performance of a particular policy.

APPENDIX 1: MONITORING FRAMEWORK

Core Indicators:

The LDP Manual (2006) sets out a number of core output indicators, which are considered by the Welsh Assembly Government to be essential for assessing implementation of national policy.

Local Indicators

In addition to the Core Indicators, the Council has identified Local Indicators to further help demonstrate the direction of travel of the LDP towards the delivery of the LDP objectives and Strategic Policies.

Source Data:

This identifies the data set that will be used to provide the statistical input to the monitoring item.

Monitoring Target:

Sets out the position, as it would be at the end of the Plan period if the Policy were implemented as intended. It also provides 'stepping stone' targets to enable us to monitor progress. The monitoring target is in the form of a time factor and a level that is anticipated will be achieved. It should be noted that some monitoring targets will not have 'stepping stone targets and will have one for the end of the period. That is because there isn't an appropriate intermediate level that could be used or the policy will be realised in one hit e.g. site allocation.

Trigger level:

This, in essence is a level to which a Policy has diverged from the monitoring target to such an extent that it could identify that the Policy is failing to be implemented or needs to be amended. In identifying trigger levels consideration needs to be given to quantify what constitutes a significant variation from the base level. This will be different for each monitoring aim.

APPENDIX 1: MONITORING FRAMEWORK

TABLE 1: STRATEGIC POLICY (SP) 1 NORTHERN STRATEGY AREA – SUSTAINABLE GROWTH AND REGENERATION

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure sustainable growth and regeneration in the north of the Borough				
SP1 Objectives 1 & 7	Amount of major retail, office and leisure development (sq m) (CI 1)	BGCBC planning applications (annual assessment)	85% of all new retail, office and leisure developments to be developed in the northern strategy area	+/- 20% (below 65% or over 85%)
	Number of net additional affordable and general market dwellings built per annum (CI 2)	Joint Housing Land Availability Study (annual assessment)	85% of all new dwellings to be developed in the northern strategy area	+/- 20% (below 65% or over 85%)
	Net employment land supply/development (ha /sq m) per annum (CI 10)	Employment Land Database (annual assessment)	85% of all new employment development to be developed in the northern strategy area	+/- 20% (below 65% or over 85%)
	Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as a percentage of total development permitted (ha and units) (CI 4)	BGCBC planning applications	50% of all allocations by 2016 100% of all allocations by 2021 75% of total development permitted	-10% No trigger +10%
	Delivery of mixed use allocations (LI 27)	BGCBC Planning Applications	The Works Completion of 3.5 ha of employment land, 200 houses, the learning zone, leisure centre and sport fields and theatre by 2016	Developments not started by 2016

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure sustainable growth and regeneration in the north of the Borough				
			<p>at The Works</p> <p>Annual completion of 50 houses (delivery phases 2 and 3 2011-2021) at The Works</p> <p>Ebbw Vale Northern Corridor Completion of employment development on Rhyd y Blew and Bryn Serth and a commercial and leisure hub</p> <p>Annual completion of 70 houses (delivery phases 2 and 3 2011-2021)</p> <p>NMC Factory and Bus Depot Completion of commercial/leisure/ community facility</p> <p>Annual completion of 12 houses in delivery phase 3 (2016-2021)</p>	<p>+/- 10% for 3 consecutive years</p> <p>Failure to deliver</p> <p>+/- 10% for 3 consecutive years</p> <p>Failure to deliver</p> <p>+/- 10% for 3 consecutive years</p>

APPENDIX 1: MONITORING FRAMEWORK

TABLE 2: STRATEGIC POLICY (SP) 2 SOUTHERN STRATEGY AREA – REGENERATION

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure regeneration in the south of the Borough				
SP2 Objectives 1, 6, 11 & 12	Amount of major retail, office and leisure development (sq m) (CI 1)	BGCBC planning applications (annual assessment)	15% of all new retail, office and leisure developments to be developed in the southern strategy area	+/-5% (below 10% or above 20%)
	Number of net additional affordable and general market dwellings built per annum (CI 2)	Joint Housing Land Availability Study (annual assessment)	15% of all new dwellings to be developed in the southern strategy area	+/-5% (below 10% or above 20%)
	Net employment land supply / development (ha/sq m) per annum (CI 10)	Employment Land Database (annual assessment)	15% of all new employment development to be developed in the southern strategy area	+/-5% (below 10% or above 20%)
	Number of leisure/tourism developments completed per annum (LI 14)	BGCBC – Tourism section	Completion of the tourism and leisure development at Cwmtillery Lakes by 201624	0% completion Site not started by 201624
	Number of land reclamation schemes completed per annum (LI 6)	BGCBC planning applications	Completion of the land reclamation scheme at Pit Head Baths, Llanhilleth by 201624	0% completion Site not started by 201624

APPENDIX 1: MONITORING FRAMEWORK

TABLE 3: STRATEGIC POLICY (SP) 3 – THE RETAIL HIERARCHY AND VITALITY AND VIABILITY OF THE TOWN CENTRES

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure town centres thrive through the implementation of the retail hierarchy				
SP3 Objective 1	Amount of major retail, office and leisure development (sq m) (CI 1)	BGCBC planning applications	80% of retail expansion, administrative and cultural development to be located in Ebbw Vale town centre	- 10%
	Number of A1 uses in primary retail areas as a percentage of all units in the primary retail area (LI 1)	Annual Town Centre Health Check	Increase the % of A1 uses in Ebbw Vale's primary retail area from a base level of 61% (2009)	- 10% of base level
			Increase the % of A1 uses in Abertillery's primary retail area at a base level of 45% (2009)	-10% of base level
			Increase the % of A1 uses in Brynmawr's primary retail area from a base level of 61% (2009)	-10% of base level
		Increase the % of A1 uses in Tredegar's primary retail area at a base level of 67% (2009)	-10% of base level	

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure the Improvement of viability in the Town Centres				
SP3 Objective 1	Annual vacancy rate in Town Centres (LI 2)	Annual Town Centre Health Checks	Vacancy rate in Ebbw Vale Town Centre at a base level of 11.5% (2009) Vacancy rate in Abertillery Town Centre at a base level of 20% (2009) Vacancy rate in Brynmawr Town Centre at a base level of 11% (2009) Vacancy rate in Tredegar Town Centre at a base level of 12% (2009) Vacancy rate in Blaina Local Town Centre at a base level of 25% (2009)	+ 5% of base level + 5% of base level + 5% of base level + 5% of base level

APPENDIX 1: MONITORING FRAMEWORK

TABLE 4: STRATEGIC POLICY (SP) 4 – DELIVERING QUALITY HOUSING

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To secure construction of 3,500666 net additional dwellings by 2021 and halt population decline				
SP4 Objectives 2 & 3	Number of net additional affordable and general market dwellings built per annum (CI 2)	Joint Housing Land Availability Study	Completion of 700 820 dwellings in delivery phase 1 (140 per annum in delivery phase 1 2006 - 2011)	+ /- 310% for 3 consecutive years
			Completion of 1,300 320 dwellings in delivery phase 2 (260 per annum in delivery phase 2 2011 - 2016)	+ /- 510% for 3 consecutive years
			Completion of 1,500 26 dwellings in delivery phase 3 (300 per annum in delivery phase 3 2016 - 2021)	+ /- 510% for 3 consecutive years
	Population level of Blaenau Gwent (LI 3)	Mid year estimate of population	Increase population to 69,1143 by 2011	+ /- 1%
			Increase population to 69,968 by 2016	+ /- 1%
			Increase population to 704,849 100 by 2021	+ /- 1%

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
	Percentage of vacant residential properties (LI 28)	Census data 2011	Decrease vacancy rate to 5% by 2011	+/-0.5%
Monitoring Aim				
To ensure the delivery of 1,000,799 affordable dwellings, 33525 of which through planning obligations				
SP4 Objective 3	Number of net additional affordable dwellings and general market housing built per annum (CI 2)	BGCBC Annual Survey of Affordable Housing	<p>11108 affordable dwellings provided on developments using Social Housing Grant in delivery phase 1 (22 per annum by 2006-2011)</p> <p>11208 affordable dwellings provided on developments using Social Housing Grant in delivery phase 2 (22 per annum by 2011-2016)</p> <p>112409 affordable dwellings provided on developments using Social Housing Grant in delivery phase 3 (22 per annum 2016-by 2021)</p>	<p>-10% for 3 consecutive years</p> <p>-10% for 3 consecutive years</p> <p>-10% for 3 consecutive years</p>
		Land Registry Data	Change in average sales values (Affordable Housing Viability Study March 2010)	+/- 10%

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
		BGCBC planning applications	Building Regulations and Code for Sustainable Homes	A change which would impact on viability of development

APPENDIX 1: MONITORING FRAMEWORK

TABLE 5: STRATEGIC POLICY 5 – SPATIAL DISTRIBUTION OF HOUSING SITES

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure that housing is delivered in all areas in accordance with the strategy				
SP5 Objective 3	Number of net additional affordable and general market housing dwellings built in the Plan area per annum (C1 2)	Housing Land Availability Study	Completion of 5248% of new dwellings in Ebbw Vale by 2021	+ /- 10% for 3 consecutive years
			Completion of 228% of new dwellings in Tredegar by 2021	+ /- 10% for 3 consecutive years
			Completion of 143% of new dwellings in Upper Ebbw Fach by 2021	+ /- 5% for 3 consecutive years
			Completion of 11% of new dwellings in Lower Ebbw Fach by 2021	+ /- 5% for 3 consecutive years
	The housing land supply taken from the current Housing Land Availability Study (TAN 1) (CI 3)	Housing Land Availability Study	Maintain 5 year supply	Below 5 years supply
	Net additional Gypsy and Traveller units (LI 4)	BGCBC planning applications	64 gypsy traveller units by 2021	Failure to deliver 100%
	Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as a	BGCBC planning applications	75% of housing units on allocated sites	-10%

APPENDIX 1: MONITORING FRAMEWORK

	percentage of total development permitted (C1 4)			
Monitoring Aim				
To ensure the delivery of housing in accordance with the strategy to increase build rates over the Plan period				
SP5 Objective 3	Number of net additional affordable and general market housing dwellings built in the Plan area per annum (C1 2)	Joint Housing Land Availability Study	<p>Completion of 700820 dwellings in delivery phase 1 (140 per annum in delivery phase 1 2006 - 2011)</p> <p>Completion of 1,300320 dwellings in delivery phase 2 (260 per annum in delivery phase 2 2011 - 2016)</p> <p>Completion of 1,50026 dwellings in delivery phase 3 (300 per annum in delivery phase 3 2016 - 2021)</p>	<p>+ /- 150% for 3 consecutive years</p> <p>+/- 150% for 3 consecutive years</p> <p>+ /- 150% for 3 consecutive years</p>

APPENDIX 1: MONITORING FRAMEWORK

TABLE 6: STRATEGIC POLICY 6 – ENSURING ACCESSIBILITY

Policy / Objective Number	Monitoring Aim	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure improved connectivity within Blaenau Gwent and with the wider area				
SP6 Objective 4	Number of highway and public transport schemes implemented (LI 5)	BGCBC – Transport section and WAG	<p>Completion of the bus priority scheme along the Brynmawr to Newport bus corridor, the bus interchange improvement at Ebbw Vale, Peripheral Distributor Road through The Works, online improvements between PDR and A465; and the dualling of the A465 Heads of the Valleys Road by 2016</p> <p>Completion of the rail link from Parkway to Ebbw Vale, new town rail station with bus interchange at Ebbw Vale, extension of rail link to Abertillery, new station and park and ride at Abertillery, new station at Cwm, provision of hourly rail service between Ebbw Vale and Newport, bus interchange improvement at Brynmawr, online improvements to the A4046 south of Cwm online improvement to the A4048 south of Tredegar; and online improvements to the A467 south of Abertillery by 2021</p>	<p>0% completion Schemes not started by 2016</p> <p>0% completion by 2024 Failure to deliver</p>

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Monitoring Aim	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure improved connectivity within Blaenau Gwent and with the wider area				
			Completion of community network (walking and cycle routes) by 2021	0% completion by 2021 Failure to deliver

APPENDIX 1: MONITORING FRAMEWORK

TABLE 7: STRATEGIC POLICY 7 – CLIMATE CHANGE

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim To ensure that more of the County Borough's electricity and heat requirements are generated by renewable and low/zero carbon energy				
SP7 Objective 6	The capacity of renewable energy developments installed per annum (CI 5)	BGCBC planning applications	38% of electricity to be delivered by renewable low/zero carbon energy 6% of heat to be delivered by renewable low/zero carbon energy	15% to be delivered by 2016 38% to be delivered by 2021 3% to be delivered by 2016 6% to be delivered by 2021
Monitoring Aim To ensure the efficient use of land				
SP7 Objective 6	Average density of housing development permitted on allocated sites (CI 6) Amount of development, including housing, permitted on allocated sites in the development plan as a % of development plan allocations and as a % of total development permitted (ha and units) (CI 7)	BGCBC planning applications BGCBC planning applications	100% of sites close to public transport corridors to be 35 units per hectare Above 35 per hectare on sites close to public transport corridors 100% of allocated sites to be developed by end of plan period 70% of all development to be on allocated sites	400% - 10% for 3 consecutive years No trigger -10%

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
	Amount of new development permitted on previously developed land (brownfield redevelopment and conversions) expressed as a percentage of all development permitted (CI 8)	BGCBC planning applications	80% of new development to be on brownfield land	- 120% for 3 consecutive years
	The number of land reclamation schemes completed per annum (LI 6)	BGCBC planning applications	Completion of Parc Bryn Bach and Llanhilleth Pithead baths by 2016 Completion of Pennant Street and Cwmcrachen by 2021	0% completion Scheme not started by 2016 0% completion by 2021 Failure to Deliver
Monitoring Aim To ensure all development accords with the objectives of sustainability				
SP7 Objectives 5 & 6	The number of new homes and non residential developments built to Code 4 (and above) for Sustainable Homes and BREEAM Excellent as a percentage of all developments required to meet the standards(LI 7)	BGCBC planning applications	25% of new homes to meet level 4 or above Code for Sustainable Homes (Annual Assessment) 20% of non residential developments to meet BREEAM	- 10% for 3 consecutive years - 10% for 3 consecutive years
Monitoring Aim To avoid development in areas at high risk of flooding				
SP7 Objective 6	Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (C1 9)	Environment Agency BGCBC planning applications	No permissions for highly vulnerable or Emergency Services within flood zone C2 100% of those permitted to meet the justification test and have shown that the consequences of flooding can be managed at an acceptable level.	3 or more 1 or more

APPENDIX 1: MONITORING FRAMEWORK

TABLE 8: STRATEGIC POLICY 8 – SUSTAINABLE ECONOMIC GROWTH

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure sufficient employment land is provided to increase economic activity				
SP8 Objectives 8 & 9	Net employment land supply / development (ha/sq m) (CI 10)	Employment land database	Completion of 23ha of employment land in delivery phase 2 (annual completion of 4.6 ha 2011-2016) Completion of 27 ha of employment land in delivery phase 3 (annual completion of 5.4 ha 2016-2021)	+/- 250% for 3 consecutive years +/- 250% for 3 consecutive years
	Employment rate for Blaenau Gwent (LI 8)	Nomis – official labour market statistics	Increase employment rate from 61.7% at 2009 to: • 65.6% - 2016 • 69.4% - 2021	-3%
	Percentage of economic inactive wanting a job (LI 9)	Nomis – official labour market statistics	Reduce percentage of economic inactive wanting a job from 8.4% at 2009 to: • 7.35% - 2016 • 6.3% - 2021	+1%
Monitoring Aim				
To ensure the diversification of the economic base				
SP8 Objective 8	Official labour market statistics for Blaenau Gwent identifying number of employees in different sectors (L1 10)	Nomis – official labour market statistics	Maintain the number of employee jobs in manufacturing at 5,300 (2008) Increase the number of employee jobs in construction industry from	-2% -1%

APPENDIX 1: MONITORING FRAMEWORK

			800 (Blaenau Gwent, 2008) to 982 (Wales, 2008)	
			Increase the number of employee jobs in services industry from 12,700 (Blaenau Gwent, 2008) to 13,797	- 2%
			Increase the number of employee jobs in tourism related industry from 1,100 (Blaenau Gwent, 2008) to 1,625 (Wales, 2008)	1%
Delivery of learning infrastructure (LI 11)	BGCBC planning applications and survey	Completion of new primary school at Ysgol Gymraeg, Brynmawr by 2011	0% completion by 2011	
		Completion of the learning zone by 2016	0% completion Learning zone not started by 2016	
		Completion of the new primary school on the lower plateau of Six Bells Colliery Site in the 3 rd phase of the Plan by 2016	School not started within the 3 rd phase of the plan	
Delivery of health infrastructure (LI 12)	BGCBC planning applications and survey	Completion of Aneurin Bevan Hospital by 2011	0% completion by 2011	
		Completion of primary care resource centres by 2021	0% completion by 2021 Failure to Deliver	

APPENDIX 1: MONITORING FRAMEWORK

TABLE 9: STRATEGIC POLICY 9 – ACTIVE AND HEALTHY COMMUNITIES

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To increase opportunities for people to participate in active and healthy activities				
SP9 Objective 11 & 12	Amount of greenfield and open space lost to development (ha) which is not allocated in the Plan (CI 11)	BGCBC planning applications	0% of greenfield and open space lost to development No significant net loss	+20% 1 development resulting in significant loss for 3 consecutive years or 3 developments resulting in significant loss for 1 year
	Hectares of recreational open space per 1000 population (FIT standard) (LI 12)	BGCBC – Open Space Assessment	Working towards FIT standards of 2.4 hectares of recreational open space per 1000 projected population (current standard 1.2 hectares)	Decrease
	Number of eligible applications making provision for open space or providing a contribution as a percentage of all eligible applications (LI 13)	BGCBC planning applications	100% of eligible applications (ten or more dwellings), to make provision for open space or provide a contribution	-20%
	Number of tourism/leisure facilities completed per annum (LI 14)	BGCBC planning applications	<p>Completion of Bedwellty House and Park by 2014</p> <p>Completion of Parc Bryn Bach, including a hotel, Eastern Valley Slopes, Garden Festival, Cwmtillery Lakes and Blue Lakes by 2016</p> <p>Completion of Nantyglo Roundhouse and Towers and</p>	<p>0% completion by 2014</p> <p>0% completion by Schemes not started by 2016</p> <p>0% completion by 2021 Failure to Deliver</p>

APPENDIX 1: MONITORING FRAMEWORK

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
	Number of people with access to natural greenspace within 400m of their home as a percentage of all people (LI 15)	BGCBC – Access to Green Space Study	community cycle routes by 2021 Increase the number of people with access to natural greenspace within 400m of their home from the current level (2007) of 65% to: <ul style="list-style-type: none"> • 77% - 2016 • 80% - 2021 	-5%

APPENDIX 1: MONITORING FRAMEWORK

TABLE 10: STRATEGIC POLICY 10 – PROTECTION AND ENHANCEMENT OF THE NATURAL ENVIRONMENT

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure the protection preservation and enhancement of the natural environment				
SP10 Objective 12	The amount of SSSI, lost to development per annum (LI 16)	BGCBC Planning applications	No net loss of area of SSSI to development	Loss -4%
	The amount of protected woodland and trees lost to development per annum (LI 17)		No net loss of protected woodland and trees	Loss -4%
	The amount of SINCs and LNRs lost to development per annum (LI 18)		No net loss of SINCs / LNRs lost to development	-1%
	The number of mitigation schemes secured annually in comparison to number of schemes which result in loss of SINC/LNR (LI 19)		100% schemes which result in loss of SIN/LNR to provide compensatory provision	-1025%
	Number of developments which have an adverse effect on European sites (LI 20)	CCW records	All applications to have no adverse effect on the status of European sites	No triggerAny permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010
	Percentage of groundwater of good status (LI 29)	Environment Agency	No decrease in the percentage of groundwater of good status	Decrease
	Background air pollution (L1 30)	BGCBC	No decrease in air quality within the County Borough	Decrease

APPENDIX 1: MONITORING FRAMEWORK

TABLE 11: STRATEGIC POLICY 11 – PROTECTION AND ENHANCEMENT OF THE BUILT ENVIRONMENT

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure that listed buildings and archaeological sites are protected preserved and where appropriate enhanced				
SP11 Objective 13	Number of listed buildings and historic sites (LI 21)	BGCBC planning applications	No applications to result in the loss of listed buildings	Greater than 1 for 3 or more consecutive years
	Number of listed buildings or archaeological sites enhanced (LI 22)	BGCBC planning applications	All applications for listed buildings or archaeological sites to enhance the building or site	No trigger
	Number of listed or local buildings of historical value brought into use for tourism (LI 23)	BGCBC – Tourism	Increase the number of listed or local buildings of historical value brought into use for tourism – 1 per 5 year delivery phase	Less than 1 in the 5 year delivery phase

APPENDIX 1: MONITORING FRAMEWORK

TABLE 12: STRATEGIC POLICY 12 – SECURING AN ADEQUATE SUPPLY OF MINERALS

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure a 10 year land bank and provision of 3Mt of aggregates				
SP12 Objective 14	Number of years land bank of permitted aggregate reserves (LI 24)	South Wales Regional Aggregates Working Party – Annual Survey	100% provision of a 10 year landbank (measured annually) through the plan period	Less than 10 year supply
	The extent of primary land-won aggregates permitted expressed as a percentage of the total capacity required, as identified in the regional waste Plan (CI 12)		100% of 3Mt	Less than 100% at 2016

APPENDIX 1: MONITORING FRAMEWORK

TABLE 13: STRATEGIC POLICY 13 – DELIVERING SUSTAINABLE WASTE MANAGEMENT

Policy / Objective Number	Indicator	Source Data	Monitoring Target	Trigger Points to Consider Review
Monitoring Aim				
To ensure the delivery of sustainable waste management				
SP13 Objective 15	Amount of waste management capacity permitted expressed as a percentage of the total capacity required, as identified in the regional waste Plan (CI 13)	BGCBC planning application and surveys	46,000 tonnes by 2021	33% completion by 2016 Failure to Deliver 100% completion by 2021
	Delivery of regional waste facility (LI 25)	BGCBC - Waste Section	Completion of regional waste management facilities by 2016	100%-Waste facility not started by 2016
	Amount of waste arising, and managed by management type (L1 26)	BGCBC Waste Section	Meet Wise About Waste Targets for: Re-use & recycling / composting for municipal waste of: 09/10 12/13 15/16 19/20 40% 52% 58% 64% Minimum proportion of reuse/recycling/composting from kerbside collection: 12/13 15/16 19/20 80% 80% 80%	No trigger

APPENDIX 3

Maps

Date : 25/11/2011

Scale : 1:2500

Report of Representations

MAP 2

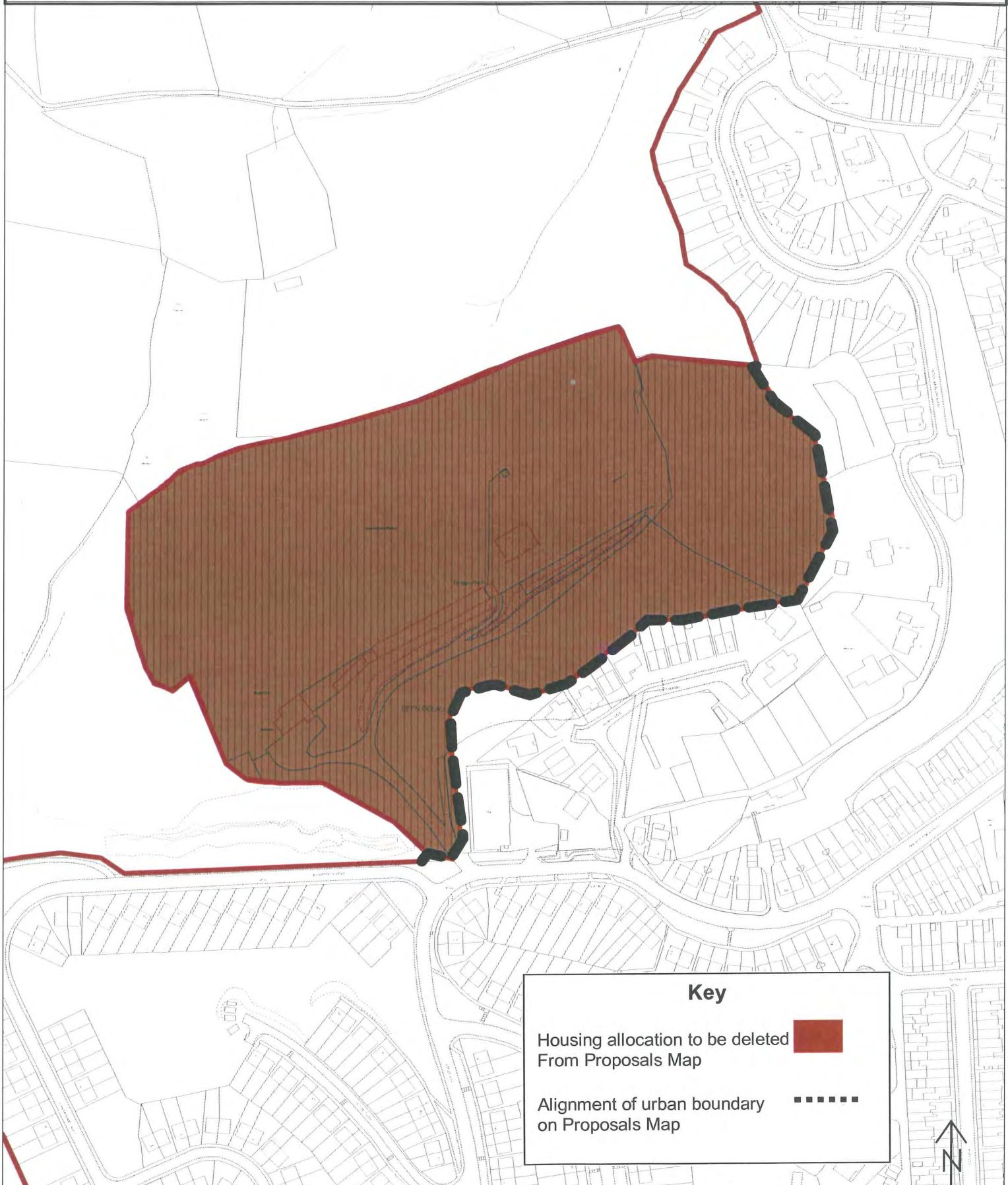
Ref: H1.4 Jesmondene Stadium, Cefn Golau


Change Proposed: Delete housing site and amend urban boundary to exclude the site.

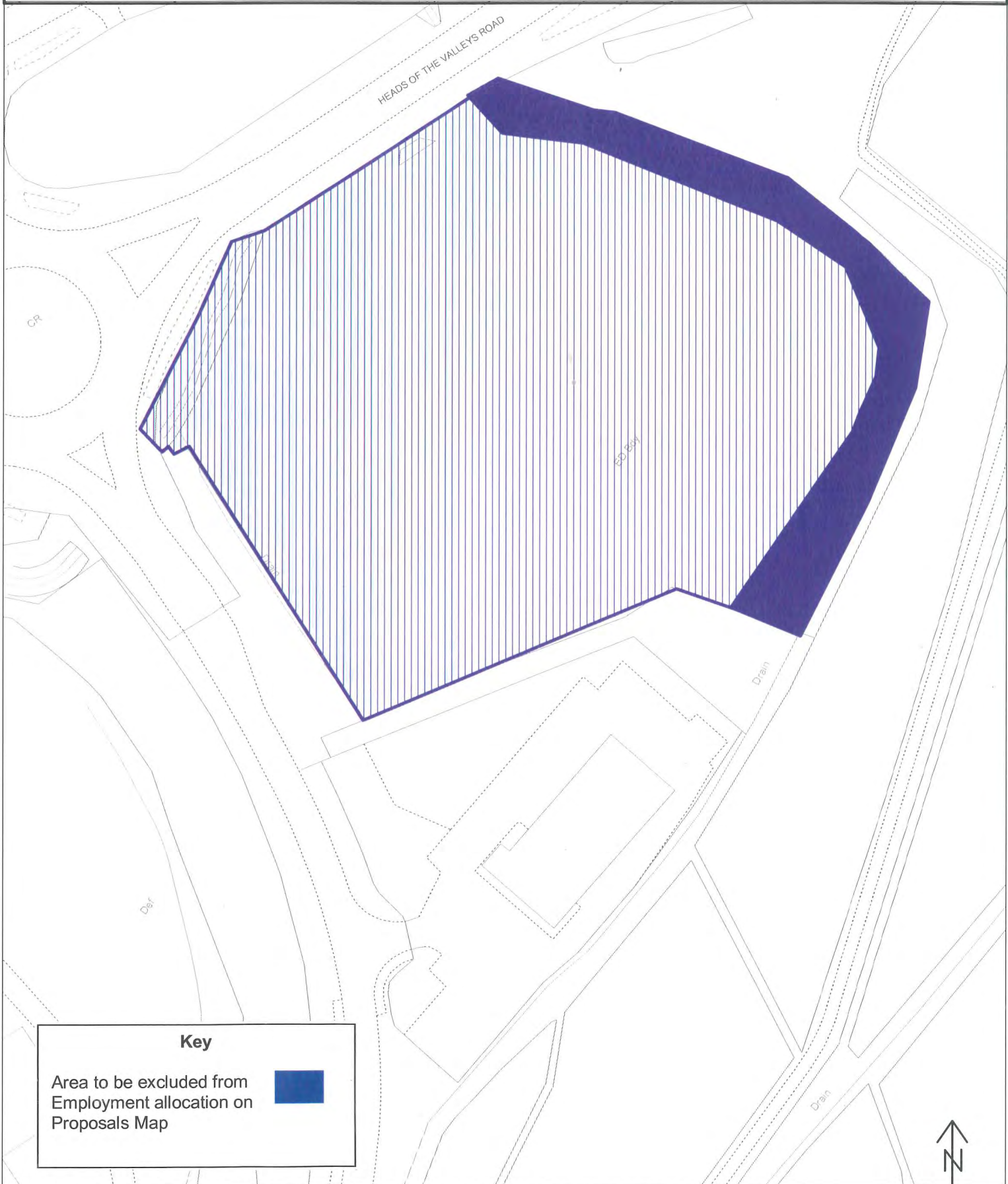


Cyngor Bwrdeistref Sirol
Blaenau Gwent
County Borough Council

Regeneration
Division



Date : 25/11/2011 Scale : 1:1250	Report of Representations	MAP 5	 Cyngor Bwrdeistref Sirol Blaenau Gwent County Borough Council Regeneration Division
Ref:	EMP1.8 Crown Business Park Platform A		
Change Proposed:	Amend the boundary of Policy EMP1.8 (to enable the extension of the Green Wedge)		



Date : 25/11/2011

Scale : 1:1250

Report of Representations

MAP 4



Cyngor Bwrdeistref Sirol
Blaenau Gwent


County Borough Council

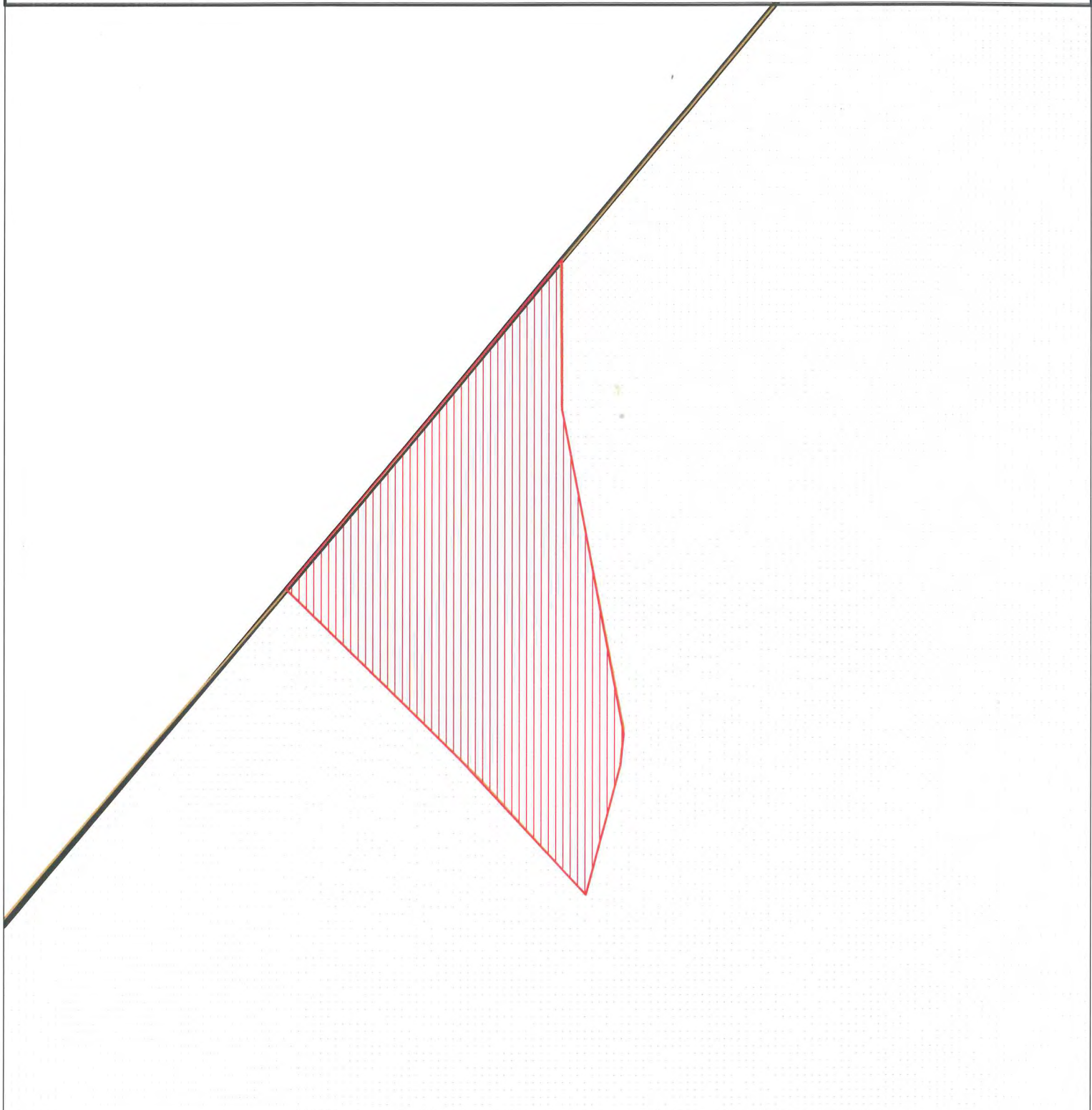
Regeneration
Division

Ref: H1.5 Business Resource Centre, Tafarnaubach


Change Proposed: Include site within Employment Protection Area (EMP 2.5)




Date : 25/11/2011 Scale : 1:2500	Report of Representations	MAP 7	 Cyngor Bwrdeistref Sirol Blaenau Gwent County Borough Council Regeneration Division
Ref:	M1 Safeguarding of Minerals		
Change Proposed:	Addition of area to the Limestone Resource (north of Trefil)		

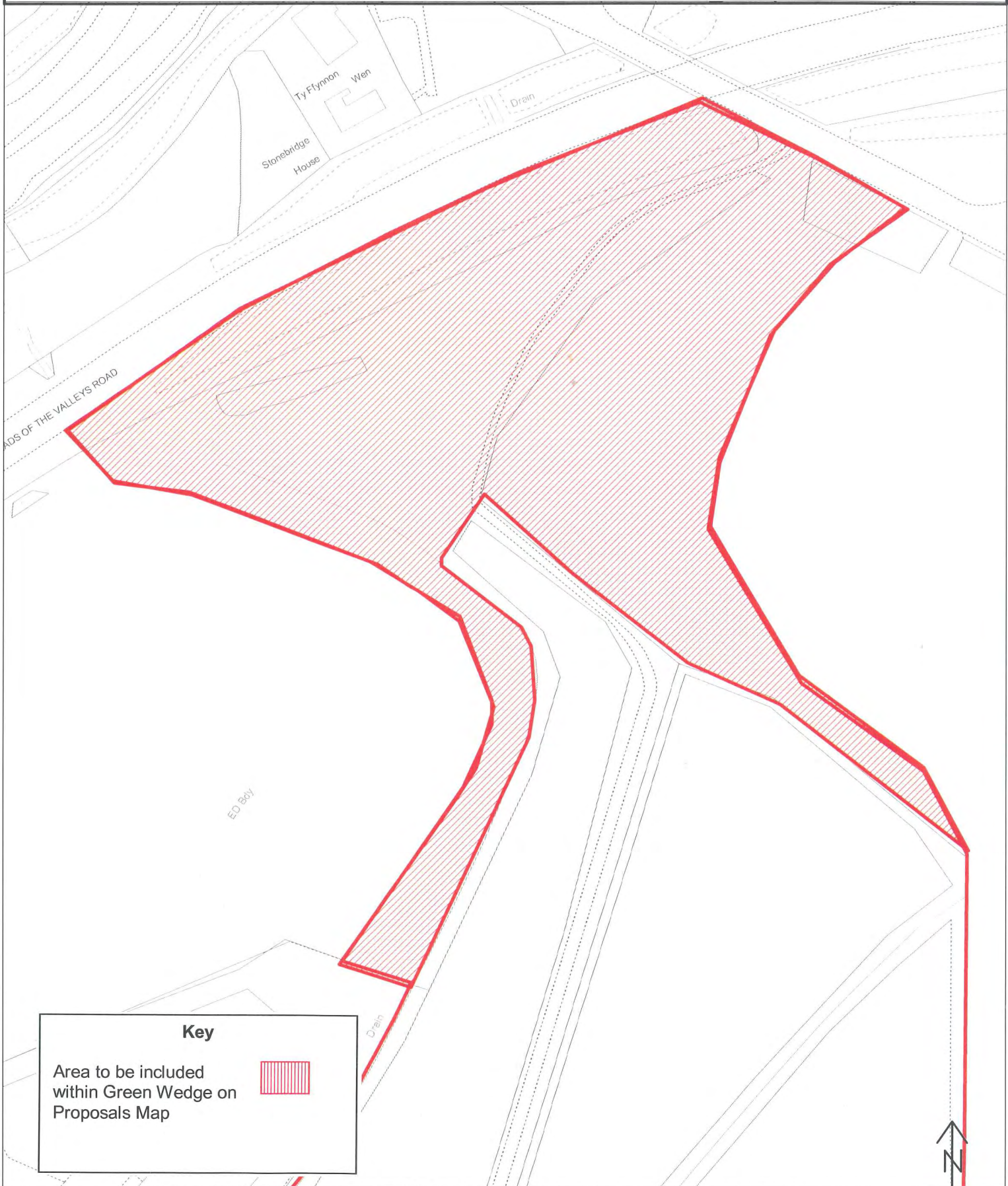



Key

Area of land to be included in Limestone Resource on Proposals Map 




Date : 25/11/2011 Scale : 1:1250	Report of Representations	MAP 6	 Cyngor Bwrdeistref Sirol Blaenau Gwent County Borough Council Regeneration Division
Ref:	ENV1.2 Green Wedge		
Change Proposed:	Extend Green Wedge		



Date : 25/11/2011 Scale : 1:6000	Report of Representations	MAP 9	 Cyngor Bwrdeistref Sirol Blaenau Gwent County Borough Council Regeneration Division
Ref:	M4.1 Trefil Quarry		
Change Proposed:	Amend boundary of the Preferred Area.		



Key

Area to be excluded from Minerals Preferred Area on Proposals Map 

Date : 25/11/2011

Scale : 1:11000

Report of Representations

MAP 8

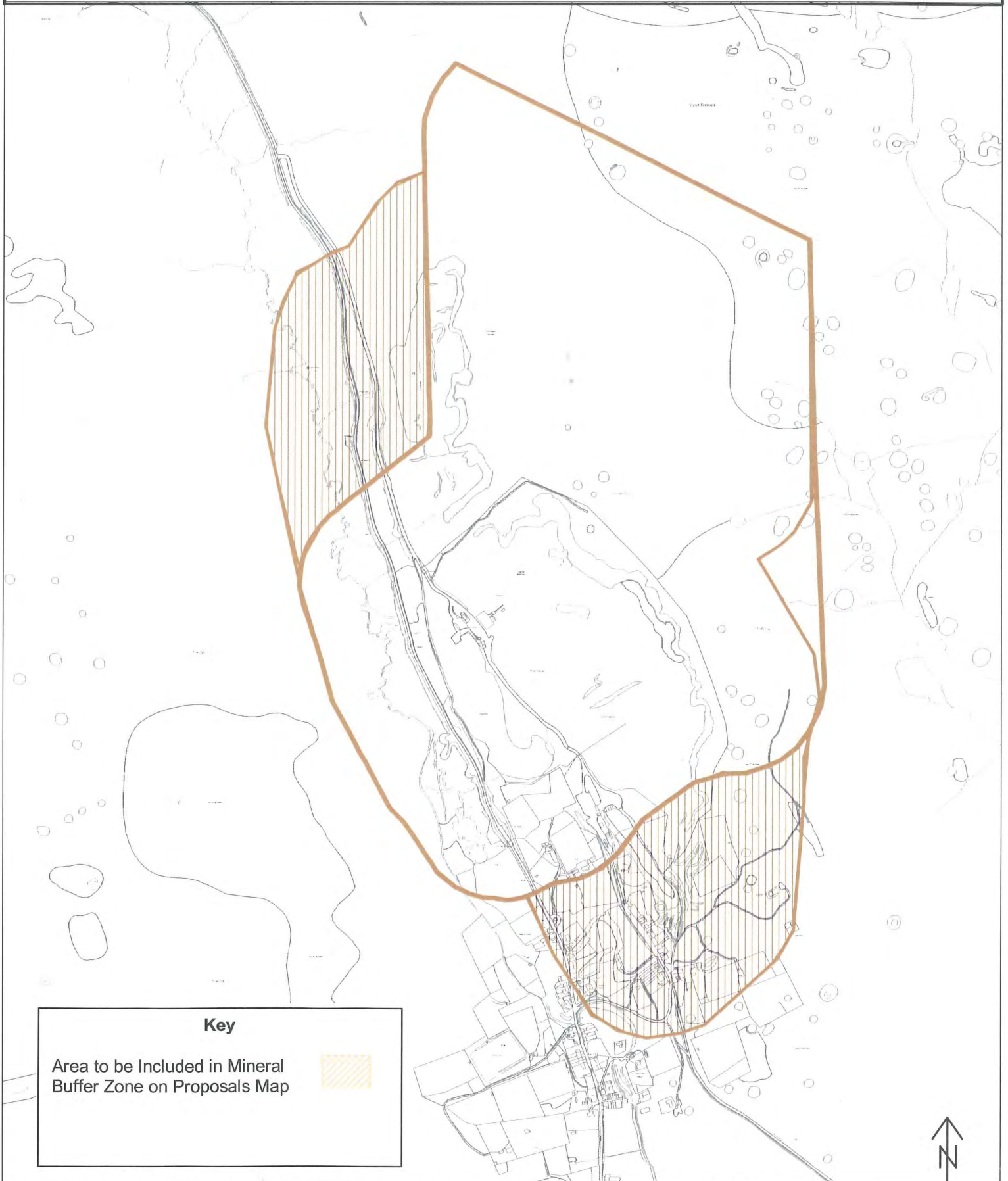


Cyngor Bwrdeistref Sirol
Blaenau Gwent
County Borough Council

Regeneration
Division

Ref: M2.1 Trefil Quarry


Change Proposed: Extend boundary of Buffer Zone

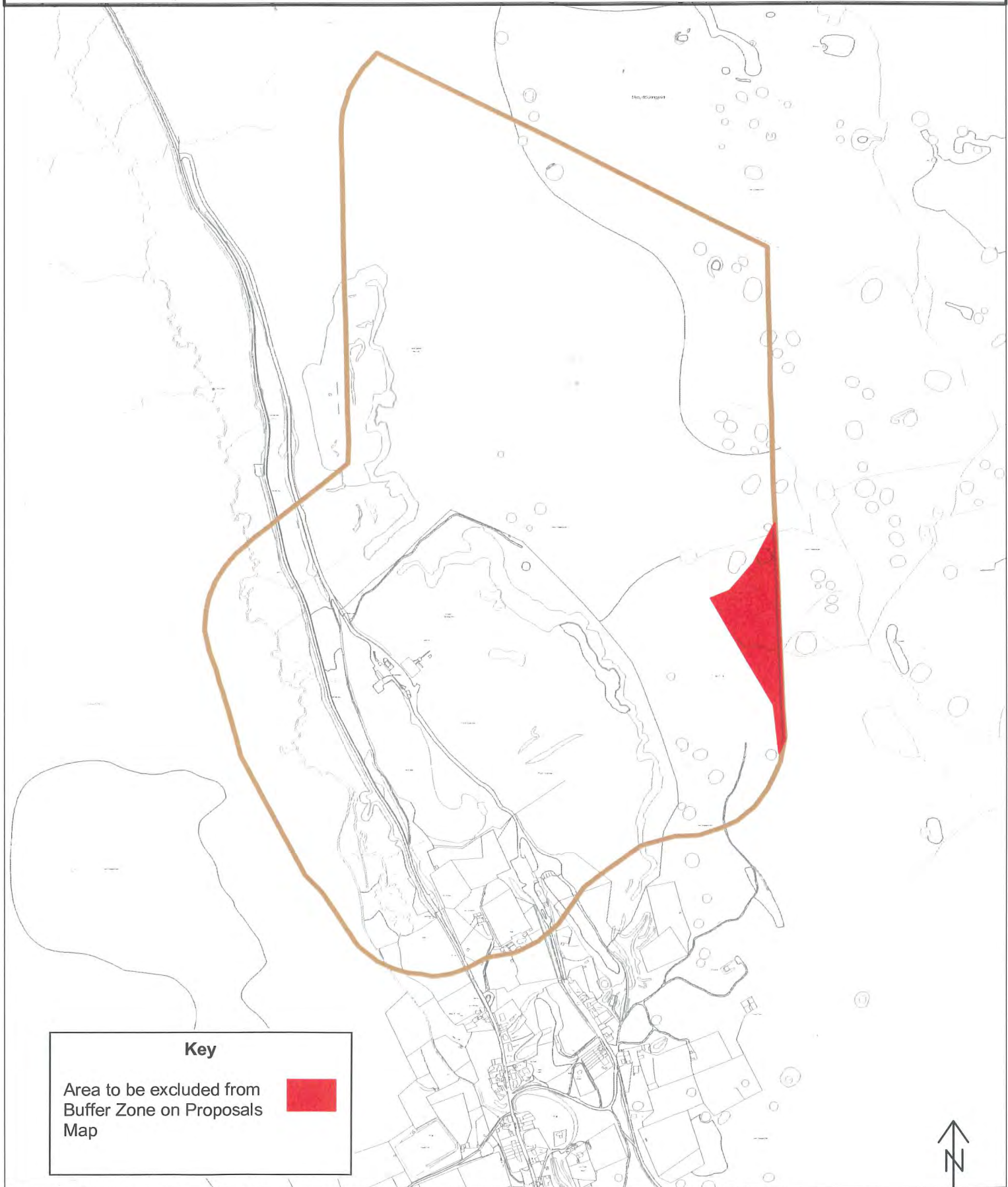


Key


Area to be Included in Mineral Buffer Zone on Proposals Map



Date : 25/11/2011 Scale : 1:10000	Report of Representations	MAP 10	 Cyngor Bwrdeistref Sirol Blaenau Gwent County Borough Council Regeneration Division
Ref:	M4.1 Trefil Quarry		
Change Proposed:	Amend boundary of the Preferred Area.		



Key

Area to be excluded from Buffer Zone on Proposals Map 

Date : 25/11/2011

Scale : 1:9000

Report of Representations

MAP 11

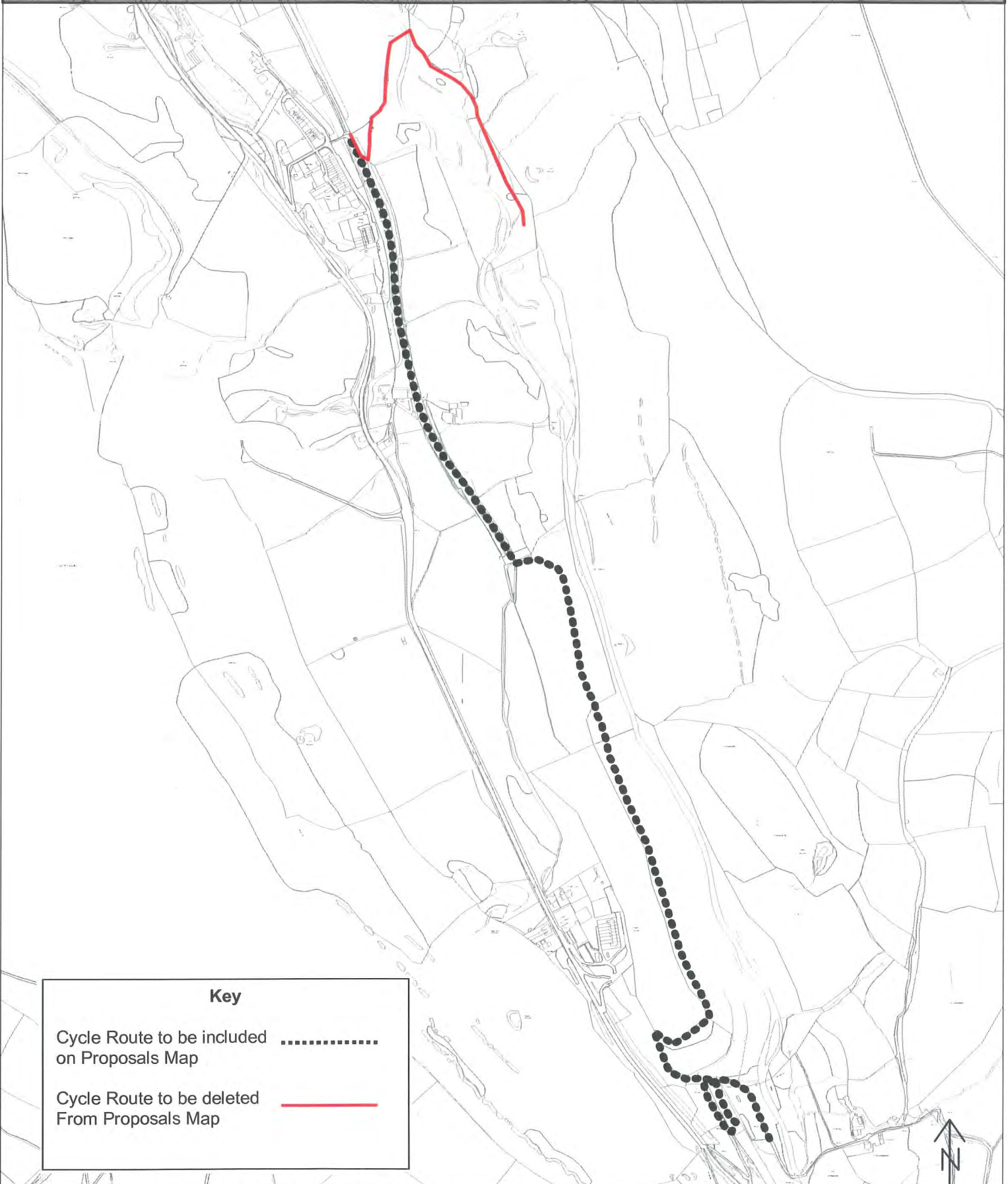


Cyngor Bwrdeistref Sirol
Blaenau Gwent
County Borough Council

Regeneration
Division

Ref: T1.7 Cycle Route Bedwellty Pits, Tredegar to County Borough


Change Proposed: Amend Cycle Route.

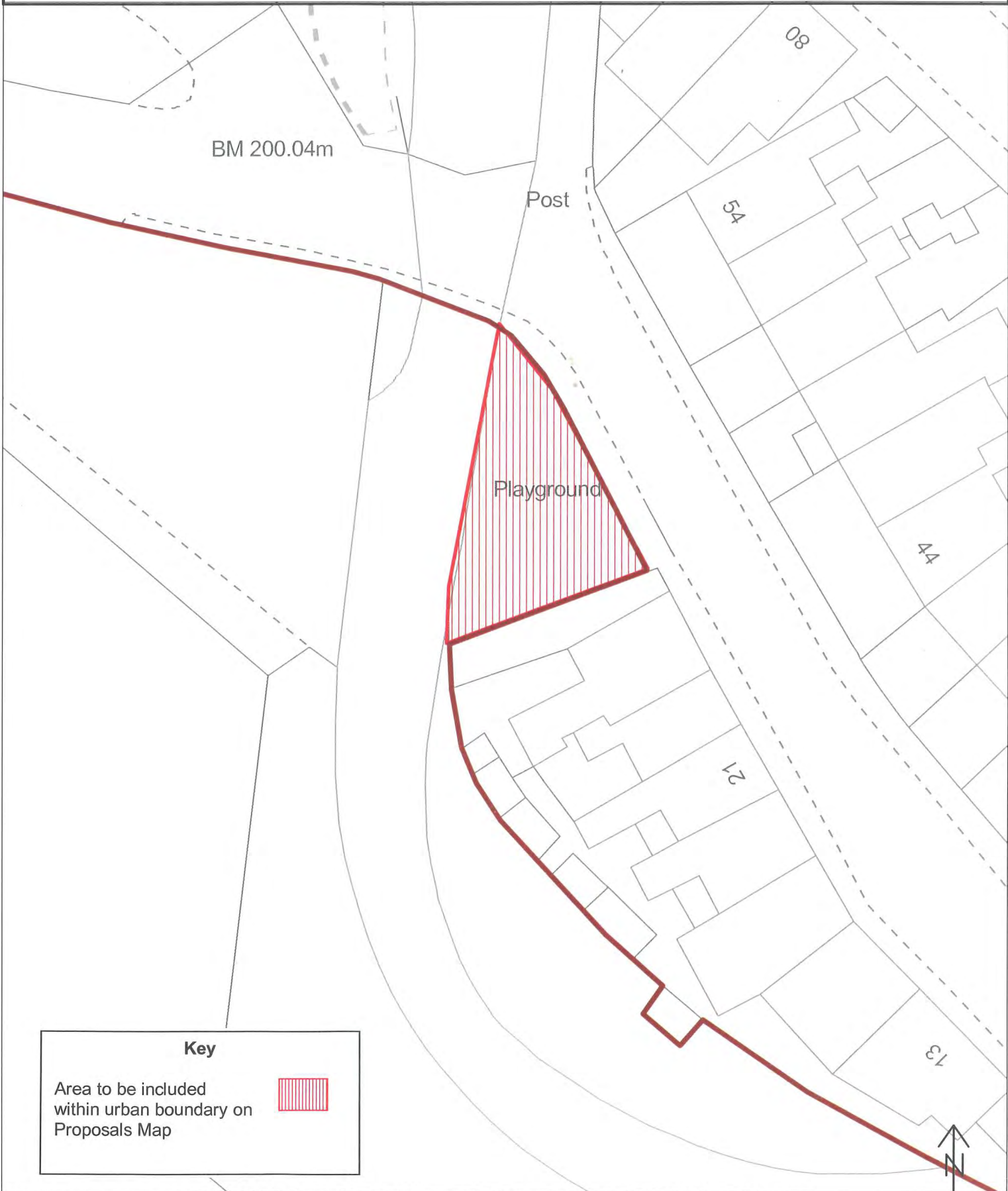


Key


Cycle Route to be included on Proposals Map
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Cycle Route to be deleted From Proposals Map ———
—————

Date : 25/11/2011 Scale : 1:300	Report of Representations	MAP 12	 Cyngor Bwrdeistref Sirol Blaenau Gwent County Borough Council Regeneration Division
Ref:	AS (B) 04		
Change Proposed:	Amendment to urban boundary at Remploy, Abertillery		



Key

Area to be included within urban boundary on Proposals Map 

Date: 25/11/2011 Scale: 1:300	Focussed Change: FC16	MAP 13	 Blaenau Gwent County Borough Council Regeneration Division
Ref:	ED1.2 Lower Plateau, Six Bell Colliery Site		
Change Proposed:	Extend boundary to include land to the south.		

