ES1.3

Blaenau Gwent County Borough Council

Local Development Plan

Hearing Session 1: Development Strategy / Vision

Tuesday 26 June 2012

Examination 2012

Blaenau Gwent County Borough Council Submission

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SESSION 1   **DEVELOPMENT STRATEGY/ VISION**

Introduction

This Statement has been prepared by Blaenau Gwent County Borough Council in order to help facilitate appropriate discussion at the Development Strategy / Vision Hearing Session. The Paper provides a response to the questions set by the Planning Inspector (Mr Vincent Maher).

Where the Council does not intend to provide any additional written evidence the Inspector's attention is directed to the relevant part of the Evidence Base, which in the view of the Council addresses the matters raised. The paper will not repeat evidence previously submitted for consideration.

The Council's detailed response to the representations received to the Strategy / Vision are contained in the Report of Representations (**SD07b**).

Council Response to Inspector's Questions (questions in bold)

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1. Does the Plan provide an appropriate spatial strategy for Blaenau Gwent? To what extent can the strategy be considered to be locally distinctive? Might the strategy be considered to be an aspiration rather than one that is credible and capable of being delivered over the Plan period? Can the spatial strategy therefore be considered to be sound?

Does the Plan provide an appropriate spatial strategy for Blaenau Gwent?

Yes. The Plan is considered to provide an appropriate spatial strategy for Blaenau Gwent. The strategy has been prepared in accordance with Welsh Government (WG) advice as set out in Local Development Plan Wales (**PG3**) and the Local Development Plan Manual (**PG1**). The Inspector's attention is directed to the Evidence base as follows:
- **SD16**: Issues Paper (July 2007)
- **SD17**: Issues Paper Draft Report of Consultation (Sept 2007)
- **SD18**: Issues & Vision Workshop (Aug 2007)
- **SD19**: Vision & Strategy Options Workshop - Members (March 2008)
- **SD20**: Vision & Strategy Options Workshop - 22nd Nov 2007 (March 2008)
- **SD21**: Vision & Strategy Options Workshop - 30th Nov 2007 (March 2008)
- **SD23**: Preferred Options Report (paragraphs 3.1-3.2) (March 2008)
- **SD24**: Scoping Report (Nov 2007)

Local Development Plans Wales (LDPW) (**PG3**) requires the strategy to include a vision, a concise statement of the Plan's key aims and objectives, the means of achieving them and have regard to the likely level of public and private sector resources (**PG3**, page 10, paragraph 2.10).

LDPW (**PG3**) states that Plans should reflect longer term aspirations, based on a vision agreed by the community and stakeholders (**PG3**, page 2,

paragraph 1.2, bullet point (i)). The vision has been written with the input of stakeholders including community representatives, and has been subject to consultation at Pre-Deposit and Deposit Stage. In preparing the vision the Council asked stakeholders to identify where they wanted Blaenau Gwent to be by 2021. This enabled longer-term aspirations for the area to be identified in accordance with LDPW advice.

Chapter 4 of the Plan includes a concise statement of the key aims and objectives (**SD01**, pages 17-19). The means of achieving them is set out in chapter 6 of the Plan (**SD01**, pages 25-47). The Plan also had regard to the likely level of public and private sector resources in determining the strategy as set out in paragraph 5.2 (**SD01**, page 21 paragraph 5.2) and chapter 9 Delivery and Implementation (**SD01**, pages 113-134).

In accordance with LDPW (**PG3**) the Plan includes a key diagram within the Plan (**SD01**, page 24) and indicates broad locations for development in chapter 5 of the Plan (**SD01**, pages 21-24).

To what extent can the strategy be considered to be locally distinctive?

The strategy is considered to be locally distinctive as it has been prepared to address specific issues/challenges faced by the area. These issues/challenges have been identified by stakeholders through consultation on the Issues Paper (**SD16**), through a workshop with stakeholders (**SD17**) and work undertaken as part of the Sustainability Appraisal/Strategic Environmental Assessment (**SD24**).

The Strategy identifies how these locally distinctive issues/challenges can be addressed to achieve the Vision identified for the area. Again the vision for the area was created with the assistance of stakeholders including members of the community. It identified where Blaenau Gwent should be in 2021. The vision was considered to be locally distinctive by all 8 groups involved in assessing the vision at workshops held on the Vision and Strategy Options. The Inspector's attention is directed to the Visioning Report (**SD22,** page 5, paragraph 4.14).

At pre-deposit stage, when the basic outline of the strategy was identified, the focus was on the overall levels of change and the spatial distribution of development. The spatial distribution is locally distinctive given the geography of the area with the three distinct valleys. The availability of candidate sites with a northern bias created a further local distinction. The sensitivity of the area in terms of environmental designations was known and also created a distinctive geography (**SD25,** page 17, Figure 2). The distribution of transport and service infrastructure was again based around the valleys and the existing settlement pattern and locally distinctiveness.

The levels of growth were identified in consultation with stakeholders and the community through workshops and formal consultation on the Preferred Strategy (**SD25**) and, as such, are considered to be locally distinctive.

The basic outline of the strategy was created around the four key issues identified for the area: the need to diversify employment; find a role and function for the towns centres; create a more balanced population stemming out migration; and provide for a range of housing needs. These are all local issues which created a locally distinctive strategy.

Overall the strategy is considered to be locally distinctive as it addresses local issues/challenges in order to meet a locally distinctive vision.

Might the strategy be considered to be an aspiration rather than one that is credible and capable of being delivered over the Plan period?

The Strategy is an aspiration to the extent that it sets out ambitions and desires for where Blaenau Gwent aims to be by 2021. As already stated this is in accordance with LDPW (**PG3**, page 2, paragraph 1.2, bullet point (i)).

The Council considers that the strategy - when prepared - was credible and capable of being delivered. As required by LDPW (**PG3**, page 6, paragraph 1.20) the Plan had regard to the resources likely to be available in implementing the plan and the implications for public sector expenditure as shown in chapter 9 Delivery and Implementation (**SD01,** pages 113-134). However, assumptions needed to be made with regards to some projects, as known funding tends to be short term (1-5 years) whereas the Plan deals with a longer period. Some schemes were therefore included where it was considered a real possibility that funding would be available in the lifetime of the Plan. This is a common issue for local authorities, particularly in areas that rely on public funding to deliver projects. The authority can only take an informed view based on its' past record of securing funding and likely future opportunities for funding. It should be noted that if a scheme is not included within a Plan it is unlikely to secure future funding.

It is acknowledged that the current economic climate brings into question the ability to deliver all the schemes in the Plan. However, Blaenau Gwent has a number of key projects either committed or under construction which will go a long way in delivering the strategy and new initiatives such as the Enterprise Zone and European Funding 2014-2020 which will also support confidence in the area.

Overall the strategy is considered to be realistic and provides a basis for rational and consistent decisions about the use and development of land.

The planning system is expected to provide for an adequate and continuous supply of land to meet society's needs - the strategy sets out to achieve this based on an understanding of what is required and can be achieved over the lifetime of the Plan.

Can the spatial strategy therefore be considered to be sound?

Yes. It is considered that the spatial strategy is appropriate and realistic and can therefore be considered to be sound.

Rebuttal – Countryside Council for Wales (Representor No: 10)

The Council agrees with CCW, that the Plan needs to flow. The differences between the Council and CCW are in how the Council view chapter 5 and 6 of the Plan and CCW's reading of these chapters. Chapter 5 sets out the broad locations for meeting development where as Chapter 6 sets out the detail of the Strategy. As far as the Council is concerned all of the Strategic Policies contribute to the strategy of the Plan. Paragraph 6.1 of the Plan (**SD01**, page 26) clearly states that the detail of the Strategy is set out in the Strategic Policies. The Council considers that Strategic Policy SP10 sufficiently covers the protection and enhancement of the environment. Strategic Policies SP1 and SP2 set out the two areas and the development strategy of the Plan.

The LDP strategy has taken into account the environment through consideration of protected areas, being informed by Strategic Environmental Assessment/Sustainability Appraisal and through identification of sites through a sound Candidate Site Methodology (**SD30**). Paragraph 5.2 of the Plan (**SD01**, page 21) explains that the sensitivity of the environment and the outcome of the sustainability appraisal helped inform the strategy.

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2. What research and evidence base underpins the regeneration and growth strategy the Council has chosen (refer to SD19 to SD23)? What alternative strategies could the Council have considered?

What research and evidence base underpins the regeneration and growth strategy the Council has chosen (refer to SD19 to SD23)?

The research and evidence base which underpins the regeneration and growth strategy the Council has chosen is set out in the Background Papers prepared to support the Plan (**SD39**-**SD58**).

In accordance with LDPW (**PG3**, page 18, paragraph 4.3) at the start of the LDP process the authority prepared an up to date information base on aspects of the economic, environmental and social characteristics of the area. A summary of the information was included in Appendix 4 of the Delivery Agreement (May 2007) (**SD12**).

In addition to this, work commenced on gathering information on housing; employment; town centres; environment; recreation, leisure and tourism; and transport. The information gathered led to the publication of the Issues Paper (**SD16**), which provided; an overview of the national regional and local policy context; the current situation; and issues for the Plan period, for each of the above topics.

Work was undertaken on understanding the settlements in the area to inform the geography of the strategy - this work can be found in section one of the Holistic Regeneration Plans (**SD35**-**SD38**).

Work had also commenced on the Sustainability Appraisal / Strategic Environmental Assessment in terms of information gathering to inform the Scoping Report. This document brought together information on the baseline key features for Economic, Social and Environmental characteristics of the Borough (**SD24,** pages 3-1 to 3-18). This also led to the identification of key issues for the Plan (**SD24,** pages 4-1 to 4-16). An outline of the economic, social and environmental characteristics of the Borough which underpinned the strategy was set out in the Preferred Strategy (**SD25**, chapter 2, pages 10-20).

The above information underpinned the development of the regeneration and growth strategy of the Plan.

In accordance with guidance the Council worked with stakeholders to identify the Preferred Strategy. Workshops were held to discuss the issues the area needed to address. Groups discussed Housing, Town Centres, Recreation Leisure and Tourism, Transport, Environment and Employment with the aim of identifying the main issues to be addressed within each topic.

The Council also worked with stakeholders to identify the vision for the area, that is where we wanted to be by 2021.

Following the first round of workshops, which helped clarify what the key issues which needed to be addressed by the Plan were, three options were prepared by the Planning Policy Team. The options were based on the issues identified in the workshop and variables in terms of demand and supply and location.

The evidence used for housing relied on early work undertaken for the Housing Background Paper (**SD39**) regarding population and household projections; information from the Housing Land Availability Studies; and the findings of the housing market assessment (**SD62**). Three options were put forward with varying growth options (low, medium and high) and varying spatial implications. The varying spatial implications were informed by information from the candidate site register (**SD31**).

The information used for employment was based on past take-up rates on land supply. The evidence base for retail was gathered through the annual retail survey of the five town centres.

Three workshops enabled participants to identify their preferred option from the three put forward and gave them an opportunity to identify further options. The preferred option chosen was based on Option 2: Growth and Regeneration but was amended to address concerns raised by groups at the workshops. This became the option the Council consulted on at the Preferred Strategy stage (**SD25**).

The information initially obtained has been updated through a continuous process of evidence gathering. It has also been supplemented where necessary by further studies. This has led to improvements in the strategy.

What alternative strategies could the Council have considered?

Other alternatives the Council considered were:

Option 1: Regeneration (continuation of the Unitary Development Plan Strategy)
- population decline from the 2006 figure
- no new housing allocations (urban containment) and a house build rate of 117 per annum
- continuation of the existing employment allocations and strategy
- the main towns of Tredegar, Ebbw Vale, Brynmawr, Blaina and Abertillery would be the focus of shopping, commercial, cultural, social and leisure activity
- the main expansion of services in Ebbw Vale

(**SD35**, pages 35-36)

This is basically a negative growth scenario.

Option 3: Balanced and Interconnected Communities
- stems out-migration and stabilises population at 2006 levels.
- the house build rate would be 157 per annum.
- the emphasis is to spread growth according to the share of population which means it would be allocated in the Ebbw Fach Valley
- equalise employment through de-allocating some employment sites in the north and relocating them County Borough wide, close to towns
- no retail hierarchy but the number of town centres in the County Borough would be reduced from five to four (Abertillery, Brynmawr, Ebbw Vale and Tredegar) by excluding Blaina.
- new complementary roles for the town centres

(**SD35**, pages 37-38).

This was a medium growth scenario with a more balanced approach to the distribution of any growth.

According to the LDP Manual the focus at pre-deposit stage is on overall levels of change and the spatial distribution of new development (**PG1,** page 62). It is considered that the Preferred Strategy (**SD25**) put forward a sufficient variety of options based on overall levels of change and spatial distribution.

In terms of other alternative strategies, the Council considered all those put forward at the workshops (**SD23,** page 13-15, paragraph 4.9-5) before identifying the preferred option. The Council could have based the strategy on a settlement hierarchy: on a set of criteria: or a broader combination of elements identified than in the options presented.

> **3. Does the Plan strike the right balance between encouraging new development, seeking development contributions from investors and securing other goals such as enhancing the environment? In broad terms, would the scale, type and distribution of allocated lands in the Plan contribute to the sustainable future development of the borough?**

Yes, the Plan is considered to strike the right balance between encouraging new development, seeking development contributions from investors and securing other goals such as enhancing the environment.

The Plan has been subject to a thorough and comprehensive Sustainability Appraisal (SA) throughout its preparation which is set out in the following reports:
- **SD04a**: Sustainability Appraisal (March 2011)
- **SD04b**: Sustainability Appraisal Appendices (March 2011)
- **SD04c**: Sustainability Appraisal – Non Technical Summary (March 2011)
- **SD24**: Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA) Scoping Report (Nov 2007)

The SA (**SD04a**) of the strategy option found that option 2 was predicted to be the most sustainable. "*The option is envisaged to potentially create a diverse economic base, improving employment opportunities as well as delivering access to a range of services and facilities"* (**SD04a,** page 6).

At the time the SA determined that all three options were predicted to have unsustainable effects on the environment. Recommendations were made in the SA to improve the approach taken in Option 2. The document states that the Deposit Plan (**SD01**), clearly demonstrated the integration of the principles recommended by the SA at the Strategic Options stage.

The Sustainability Appraisal (**SD04a,** pages 10-11) identifies that:

 "The LDP overall is likely to have significant benefits for sustainable development, particularly relating to the following contributors:
- *Economic growth and diversification of the local economy;*
- *Increased levels of local employment and equitable distribution of opportunities;*
- *Improved tourism economy complementary to the regional offer;*
- *Enhanced vitality and viability of town centres;*
- *Improved ability to meet housing needs including the needs of the Gypsy, Traveller and Travelling Showpeople communities;*
- *Increased levels of skills and education;*
- *Improved accessibility to essential services and facilities;*
- *Improved levels of health and wellbeing including a reduction in crime and the fear of crime and an enhanced sense of local distinctiveness;*
- *Increased potential for a modal shift to more sustainable modes of transport;*

- *Increased potential for enabling enhanced biodiversity;*
- *Conservation of heritage assets;*
- *Making the best use of natural resources including prioritising the use of previously developed sites and promoting the use of sustainably sourced materials;*
- *Increased energy efficiency in new development and encouraging the generation of energy from low and zero carbon sources; and*
- *Improved protection of landscape quality where possible."*

In terms of seeking contributions from developers the Council's Supplementary Planning Guidance document on Planning Obligations (**SD128**) makes it clear that the viability of schemes will be considered and a clear process is set out on how to deal with these situations (**SD128**, pages 11-12, paragraphs 4.5-4.8). The Study into the Economic Viability of providing Affordable Housing identified that 10% affordable provision was viable based on an assessment of a planning obligation of £2,500 per dwelling. This information provides guidance to the Council on what is generally viable on a site (**SD69**, page 13, paragraph 3.18). The Council will therefore, only be seeking from developers what is viable based on site assessment.

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4. How is the strategy consistent with the Wales Spatial Plan, other national guidance, regional Plans and the strategies and the plans of neighbouring authorities?

The influence of the Wales Spatial Plan, other national guidance and regional Plans on Blaenau Gwent's strategy is outlined in each of the Background Papers (**SD39** to **SD58**). In addition, chapter 2 of the Plan (**SD01,** pages 5-12) identifies the Policy context for the Strategy. The relevant documents were reviewed as part of the development of the evidence base of the Plan, and informed the development of the strategy. A summary of this information is attached at appendix 1.

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5. Is the proposed geographic distribution of new development proposed appropriate? What are the consequences of the proposed focus of new development in and around Ebbw Vale on the south of the county borough?

Is the proposed geographic distribution of new development proposed appropriate?

The proposed geographic distribution of new development is considered appropriate. It accords with the Wales Spatial Plan advice that strategy interventions, focused on regeneration and investment in the most deprived areas of the capital Region, should be along sustainable transport corridors and support key settlements. The identification of Ebbw Vale as the key settlement for the area is in accordance with the Wales Spatial Plan advice

(**W34,** page 99, paragraph 19.5). The fact that this is also supported by two regeneration and investment opportunities MU1 and MU2 along a sustainable transport corridor gives greater credence to the strategy. These two sites provide a significant element of the growth of the area and both the sites were within the urban boundary identified in the Blaenau Gwent Unitary Development Plan (**SD127a**).

The Strategy was based on the availability of sites, the willingness of the private sector to invest; the sensitivity of the environment; the basic transport and service infrastructure; the results of public participation and public consultation; and the outcome of the Sustainability Appraisal.

The allocation of sites followed a robust and methodical assessment process to ensure that every allocated site is capable of development and can contribute to the delivery of the Strategy. The Inspector's attention is directed to the Candidate Site Methodology Background Paper (**SD30)** which sets out the assessment process in full.

A concentration of development in Ebbw Vale has enabled a preference for the use of previously developed land in accordance with national policy (**W41,** page 55, paragraph 4.8.1).

Rebuttal – Welsh Government (Representor No: 3)

WG requests that Table 3 from the Housing Delivery Paper (**SD44**, page 7) which sets out the distribution of housing across the Borough be included in the Plan. The Council does not have an objection to including the table if the Inspector considers it aids the clarity of the Plan.

WG also seeks clarification of what needs to happen to deliver the strategy. The Council addresses this issue in its statement for Hearing Session 16, Delivering Infrastructure (**ES16.3**). Again if the Inspector considers it appropriate to amend paragraph 6.37 to refer to what needs to happen to deliver the strategy the Council has no objection.

What are the consequences of the proposed focus of new development in and around Ebbw Vale on the south of the county borough?

The consequences of the proposed focus of new development in and around Ebbw Vale on the south of the county borough are considered to be generally positive.

A major part of the strategy is to build a network of district hubs around the principal hub of Ebbw Vale so that all areas can share in the benefits of growth and the new opportunities being provided at Ebbw Vale. The benefits of regeneration are to be spread 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 rather than create greater disparities.

The facilities identified at The Works and Ebbw Vale Northern Corridor could not have been accommodated or funded by Welsh Government in the south of the Borough.

To identify further housing sites, less sustainable sites than those available in the rest of the Borough would have needed to be identified.

The area will be able to build on its' unique identity by protecting the heritage and the natural environment. There are opportunities to focus on leisure and tourism, building on the areas high quality landscape setting.

6. How have the county's settlement boundaries been designated?

The Council's evidence base for the designation of settlement boundaries is set out in:
- **SD30:** Candidate Site Methodology Paper
- **SD32f:** Findings of the Candidate Site Assessment Process: Appendix 5 Settlement Boundary Review

To summarise, the Council used the existing settlement boundary (also known as the defined urban area) in the adopted Unitary Development Plan (UDP) (**SD127a**) as a starting point to developing a settlement boundary for the LDP. A review of the boundary was undertaken which involved planning policy officers walking the boundary to ensure that the boundary followed a logical and defensible line so that the area was defined within which development would normally be allowed; the full and effective use of urban land was promoted; and the boundary would prevent inappropriate development in the countryside.

The review also identified that the existing settlement boundary contained a number of anomalies and inconsistencies. To correct this, it was agreed that all allotment gardens, recreation grounds and cemeteries adjoining the existing Unitary Development Plan boundary were excluded from the new settlement boundary. This was to protect the local amenity of communities.

In addition to this, extant planning permissions within the last five years were included within the boundary, as the principle for development of these sites has been approved by the Council. Also, since the adoption of the Unitary Development Plan, the Council have changed the GIS basemap from Landline to Mastermap, therefore changes were required due to the different basemap and different line work.

A further element of the settlement boundary review formed as a result of the candidate site process. 17 sites were submitted which were smaller than 0.3 hectares and were located outside the settlement boundary of the UDP. It was considered more appropriate for these small sites to be considered as part of the Settlement Boundary Review process, rather than the candidate site process (**SD30**, pages 2-3, paragraphs 4.1 – 4.7).

The assessment of these small sites required consideration of the relationship between the site and the existing urban area. For each site the following issues were assessed which included the current use and condition of the site; its topography and its relationship with adjacent land uses; access and other possible constraints that would prevent any development of the site. The assessment determined whether or not the site should be included in the urban area or considered to be part of the countryside. The results of this process are set out in **SD32f**.

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7. Are the detailed policies that support the strategy locally distinctive? Do any of the policies repeat national guidance? If so, should these policies be amended or deleted? Do the policies contain an appropriate element of flexibility?

Are the detailed policies that support the strategy locally distinctive?

Yes - Strategic Policies SP1 to SP13 are considered to be locally distinctive as they translate relevant national and regional policy down to a local level that is relevant to the Plan's vision, themes, objectives and spatial strategy.

Do any of the policies repeat national guidance?

The table attached at appendix 2 identifies where there is repetition of national policy.

If so, should these policies be amended or deleted?

Whilst Planning Policy Wales states that national planning policies should not be repeated it allows the LDP to explain how they apply to the local area (**W41,** page 18, paragraph 2.1.4). The strategic policies aim to set out the whole picture of how the area is to be developed. Therefore as a general rule the Council would suggest the amendment of policies rather than deletion.

Do the policies contain an appropriate element of flexibility?

Although some policies have explicit flexibility due to over allocation, for example Strategic Policies SP4, SP12 and SP13, most policies rely on the monitoring framework to provide an element of flexibility. This is achieved through the identification of monitoring targets and trigger points. When the Annual Monitoring Report assesses the implementation and effectiveness of the Strategic Policies, triggers identify where policies are not performing. The trigger points provide flexibility for Policies to deviate from the monitoring target set.

Appendix 1

Wales Spatial Plan – People Places, Futures (W34)

The Strategy is consistent with the Wales Spatial Plan's (**W34**) 6 core themes as identified below:

- **Building Sustainable Communities**

The Wales Spatial Plan identifies Ebbw Vale as being a key settlement that has a crucial role to play in the success of the Capital Region (**W34,** page 100, paragraph 19.7). The Plans strategy is based on building a network of district hubs around the principal hub of Ebbw Vale and is thus consistent with the Wales Spatial Plan (**W34**). Creating a Network of Sustainable Vibrant Valley Communities is a theme that runs throughout the Plan (**SD01**, page 17, Theme 1). Strategic Policies SP1, SP2 and SP4 of the Plan (**SD01**) relate to building sustainable communities.

- **Promoting a Sustainable Economy**

The Wales Spatial Plan identifies that the area needs to develop a stronger presence in higher value services and the knowledge economy and seize the opportunities to create jobs in tourism, creative industries, renewable energy, recycling and waste (**W34,** page 103, paragraph 19.22). It also advised that strategic interventions focused on regeneration and investment in the most deprived areas of the Capital Region should be along sustainable transport corridors and support key settlements (**W34**, page 104, paragraph 19.25). The strategy of the Plan is to increase employment opportunities and diversify the economy. It also seeks to provide an appropriate range and mix of employment sites that can support emerging employment needs (**SD01**, page 22, paragraph 5.9). In accordance with the Wales Spatial Plan new employment allocations are concentrated around Ebbw Vale.

Other issues such as sustainable tourism and leisure and raising skills are also part of the Plans strategy (**SD01**, page 38, Strategic Policy SP8). Sustainable Economic Growth and the promotion of learning and skills is a theme throughout the Plan (**SD01**, page 18, Theme 2).

- **Valuing our Environment**

Making South East Wales work as a networked environmental region is seen as central to addressing the challenges of past and future development. The two main elements of this are: protecting wildlife and creating wildlife corridors; and action to strengthen the environmental networks. Strategic Policy SP10 addresses these issues. One of the themes which runs through the Plan is to protect and enhance the unique natural environment (**SD01**, page 19, Theme 3).

- **Achieving Sustainable Accessibility**

The overall priority is to make better use of the area's existing transport infrastructure, to deliver more sustainable access to jobs and services. The Strategy of the Plan, as set out in Strategic Policy SP6, is to deliver a sustainable transport network to improve accessibility. Improving journey times by bus and rail between the key settlements; bus priority measures;

safe cycling routes; and ensuring the existing road capacity is used with maximum efficiency, are all elements of this Policy.

- **Respecting Distinctiveness**

The Wales Spatial Plan identifies that each town needs to foster its own distinct sense of identity, building on its heritage and culture to create a network of settlements with real character which complement each other and adding strength to the attractiveness of the region as a whole. A theme that runs throughout the Plan is to create a Network of Sustainable Vibrant Valley Communities (**SD01**, page 17, Theme 1). Each of the town centres identifies complimentary roles around tourism, local heritage, culture and leisure (**SD01,** page 23, paragraph 5.10 and Strategic Policies SP1 and SP2).

- **Working with our Neighbours**

Blaenau Gwent worked with its neighbours and others in preparing the South East Wales - Capital Region Area Strategy collaborative work for inclusion in the Wales Spatial Plan (**W34,** pages 97-107). Blaenau Gwent has also worked with its' neighbours in preparing regional strategies (Waste, Minerals, Transport) and in setting guidance on how strategic issues such as affordable housing viability and Special Landscape Areas should be identified.

Turning heads .... A strategy for the Heads of the Valleys 2020 (2006)

The strategy provides a framework for regenerating the area with a focus on 5 priority themes. As identified below the Plan is consistent with these themes.

- **An attractive and well-used natural, historic and built environment**

This theme is picked up in theme 3 (**SD01**, page 19, Theme 3) of the Plan, which seeks to create safe, healthy and vibrant communities; and protect and enhance the unique natural and built environment. Strategic Policies SP2, SP9 and SP10 identify how this priority theme is addressed in the Plan (**SD01**).

- **A vibrant economic landscape offering new opportunities**

This theme is picked up in theme 2 of the plan (**SD01**, page 18, Theme 2), which seeks to create opportunities for a vibrant economic landscape. Strategic Policies SP1, SP2, SP3, SP8 and SP9 identify how this priority theme is addressed in the Plan (**SD01**).

- **A well educated, skilled and healthier population**

Education and skills are picked up in theme 2 of the Plan which seeks to promote learning and skills (**SD01**, page 18, Theme 2). Strategic Policy SP8 identifies how this theme is addressed in the Plan (**SD01**). Health is picked up in theme 3 and Strategic Policy SP9 identifies how this is addressed in the Plan (**SD01**).

- **An appealing and coherent tourism and leisure experience**

This theme is picked up in theme 2 and 3 of the Plan. Tourism is seen as part of the sustainable economic growth of the area identified in theme 2, whilst a

high quality leisure experience is picked up in theme 3. Strategic Policies SP1, SP2, SP8, and SP9 identify how this is addressed in the Plan (**SD01**).

Public confidence in a shared bright future
The strategy aims to deliver a bright future for the area. The strategy received broad support during the consultation process on the Preferred Strategy (**SD07a,** page 14, paragraph 3.61).

South East Wales Transport Alliance – Regional Transport Plan (SD100)

The Regional Transport Plan (RTP) sets out a vision and 8 priorities which set the general direction of the Plan. The eight priorities are set out at page 8 of the Plan (**SD01**). The following table identifies which Strategic Policy of the Plan addresses each priority.

Priority	Strategic Policy
1. To improve access for all to services, facilities and employment, particularly by walking, cycling and public transport.	SP6
2. To increase the proportions of trips undertaken by walking, cycling and public transport.	SP6
3. Minimising demand on the transport system	SP1
4. To develop an efficient, safe and reliable transport system with improved transport links between the 14 key settlements in South-East Wales and between South-East Wales and to the rest of Wales, the UK and Europe.	SP6
5. To provide a transport system that encourages healthy and active lifestyles.	SP6
6. To reduce significantly the emission of greenhouse gases and the impact of the transport system on local communities.	SP1, SP2, SP6
7. To ensure developments are accessible by sustainable transport and make sustainable transport and travel planning an integral component of regeneration schemes.	SP6
8. To make better use of the existing transport system	SP6

South East Regional Waste Plan (SD96)

Theme 4, creating opportunities to secure an adequate supply of minerals and reduce waste, ensures that the requirements of the Waste Plan are met. Strategic Policy SP13 sets out how this is to be achieved (**SD01**, page 45).

South Wales Regional Aggregates Technical Statement (SD98)

Theme 4, creating opportunities to secure an adequate supply of minerals and reduce waste, ensures that the requirements of the Aggregates Plan are met. Strategic Policy SP12 sets out how this is to be achieved (**SD01**, page 44).

Plans of neighbouring Authorities

The strategy is consistent with other neighbouring authorities as all have had regard to the Wales Spatial Plan. All the South East Wales authorities worked

collaboratively on the South East Wales - Capital Region strategy set out in the Wales Spatial Plan.

Neighbouring authorities have been invited to workshops and consulted on the preparation of the Plan. The Council has also met with neighbouring authorities on a regular basis at meetings of the LDP Pathfinder and South East Wales Strategic Planning Group. The Council has also worked closely with neighbouring authorities on general issues such as special landscape areas, habitat regulation assessment, SINC identification, affordable housing viability assessment, minerals, cross border issues and monitoring.

Appendix 2

Blaenau Gwent County Borough Council
Response to Inspector's Questions INSP 005

SESSION 1 - REVIEW OF DISTINCTIVENESS OF LDP POLICIES

Are the detailed policies that support the strategy locally distinctive? Do any of the policies repeat national guidance? If so, should these policies be amended or deleted? Do the policies contain an appropriate element of flexibility?

Policy	How is this policy locally distinctive?	Does the policy repeat national guidance? If so, why?	Is it necessary to delete / amend the policy?	If so, what changes are needed for reasons of soundness?
SP6	Policy SP6 is considered to be distinctive as it sets out the locally important issues that are considered necessary for ensuring accessibility in Blaenau Gwent.	It is accepted that the following criteria repeat national guidance set out in Planning Policy Wales: SP6.6 (**W41**, paragraph 4.10.11). Access and mobility were specific issue raised through consultation with the Access for All Forum and should therefore form part of the strategic policy. The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A
SP7	Policy SP7 is considered to be distinctive as it sets out the locally important issues that are considered necessary for ensuring	It is accepted that the following criteria repeat national guidance set out in Planning Policy Wales: SP7.1.d (**W41**, paragraph 4.8.1). SP7.2.a (**W41**, paragraph4.10.6)	No.	N/A

	climate change is addressed in Blaenau Gwent.	The lack of reference to these issues was raised through consultation on the Preferred Strategy and the Sustainability Appraisal process. The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.		
SP9	Policy SP9 is considered to be distinctive as it sets out the locally important issues that are considered necessary for ensuring active and healthy communities are created.	It is accepted that the following criteria repeat national guidance set out in Planning Policy Wales: SP9.b (**W41**, paragraph 11.2.3) SP9.c (**W41**,paragraph 4.10.11) The health of residents in Blaenau Gwent is an important issue as identified in the Community Plan. The Local Health Board identified the key part open space provision plays and sought reference to this within the Plan. The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A
SP10	Policy SP10 is considered to be distinctive as it sets out the locally important issues that are considered necessary for ensuring the protection and enhancement of the natural environment within Blaenau Gwent.	It is accepted that the following criteria repeat national guidance set out in Planning Policy Wales: SP10.a (**W41**, paragraph 5.3.1) SP10.d (**W41**, paragraph 4.5.4) The need for reference to these issues was raised through the Sustainability Appraisal process and Habitat Regulation Assessment. The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A
SP11	Policy SP11 is considered to be distinctive as it sets out the locally important issues that are considered necessary for ensuring	It is accepted that the following criterion repeats national guidance set out in Planning Policy Wales: SP11.a (**W41**, paragraph 6.5.9) The aim of the Plan is to set out a coherent strategy for	No.	N/A

	the protection and enhancement of the built environment within Blaenau Gwent.	Blaenau Gwent, covering the issues that have been identified as being of local importance.		
DM1	LDPW (**PG3**, paragraph 2.15) encourages a focus on topic related policies such as residential amenity; biodiversity; landscape; heritage and natural resources; accessibility and transport issues; economic and cultural vitality; and viability; and design.	It is accepted that the following criterion repeats national guidance set out in Planning Policy Wales: DM1. 3.c (**W41**, paragraph 4.10.11) The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A
DM2	LDPW (**PG3**, paragraph 2.15) encourages a focus on topic related policies one of these being design. This policy is considered to be locally distinctive.	It is accepted that the following criteria repeats national guidance set out in Planning Policy Wales: DM2.a (**W41**, paragraph 4.10.9) DM2.b (**W41**, paragraph 4.6.8) DM2.g (**W41**, paragraph 4.10.8) The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A
DM3	LDPW (**PG3**, paragraph 2.15) encourages a focus on topic related policies one of these being natural resources.	It is accepted that the following criteria repeats national guidance set out in Planning Policy Wales: DM3a and b. (**W41**, paragraph 4.10.8) The Environment Agency specifically asked for this policy to be included within the Plan.	No.	N/A
DM5	Policy DM5 provides a positive policy framework for the development of low and zero carbon technologies in accordance with PPW (**W41**, paragraph 12.9.1)	It is considered that the policy does not repeat national policy.	N/A	N/A
DM9	It is accepted that criterion f repeats policy DM2.	WG requested the inclusion of this policy.	It is accepted that this criterion	Delete criterion f

				could be deleted.	
DM14	The loss of open space is local issue for the area.	It is accepted that the following criterion repeats national guidance set out in Planning Policy Wales: DM14 c (**W41**, paragraph 4.10.10) The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A	
DM15	LDPW (**PG3**, paragraph 2.15) encourages a focus on topic related policies one of these being biodiversity.	It is accepted that the following criterion repeats national guidance set out in Planning Policy Wales: DM15.1 (**W41**, paragraph 5.3.1) DM15 2.a (**W41**, paragraph 4.5.4) The need for reference to these issues was raised through the Sustainability Appraisal process and Habitat Regulation Assessment.	No.	N/A	
DM17	Loss of trees is a local issue in the area.	It is accepted that policy DM17 repeats national guidance set out in Planning Policy Wales. The aim of the Plan is to set out a coherent strategy for Blaenau Gwent, covering the issues that have been identified as being of local importance.	No.	N/A	