

**BLAENAU GWENT COUNTY BOROUGH COUNCIL
LOCAL DEVELOPMENT PLAN EXAMINATION**

**Blaenau Gwent County Borough Council
Response to Inspector's Question INSP 008**

The Council is invited to review CCW's revisions to its statement of common ground with the Council as it feels necessary in its statements for sessions 1,6,7, and 13. I will make some time at the end of Session 20 (10 July 2012) to check the Council's responses to any of CCW's fifteen points not covered in its statements.

(1) Lack of objective for the protection, enhancement and management of the Borough's unique landscape (Representation No: 10D.184) and Focussed Change FC5.A

Council Response

The Council has no issue with the proposed amendment suggested by CCW.

(2) Objective 7 to include a reference to County Residents also benefiting from the protection and enhancement of the natural environment (Representation No 10D.188)

Council Response

The Council does not consider it necessary to change objective 7 as outlined by CCW as objective 14 already covers the issue. The Council is however prepared to include a reference to green infrastructure in objective 7 if the Inspector considers it necessary.

(3) Chapter 5.0: Spatial Strategy - The Strategy lacks reference to the environment (Representation No 10D.203)

Council Response

The Inspector's attention is drawn to the Council's response contained in **ES1.3** question 1.

(4) Chapter 5.0: Spatial Strategy - SINC's are not covered (Representation No 10D.204)

Council Response

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 Strategic Policy 10 and Development Management Policy 15. It is considered that the inclusion of SINC's in the strategy would not aid the logical flow of the Plan.

(5) Policy SP1 - Need for criterion on the natural environment (Representation No10D.206)

Council Response

The Inspector's attention is drawn to the Council's response contained in **ES1.3** question 1.

(6) Policy SP10 - General support but queries what is meant by 'important species' (Representation No 10D.216) and Focussed Change FC5.C

Council Response

The Council has no issue with the proposed amendment suggested by CCW.

(7) Specific reference should be included in criterion 1 of policy DM1 for a requirement for biodiversity enhancement as set out in TAN 5 and 12 (Representation No 10D.225)

Council Response

As stated in the response to issue 5 above the Plan clearly states that it must be read as a whole. All policies are interrelated and must be read together to understand their combined effect. The protection and enhancement of Biodiversity is covered by Policies SP10 and DM15 therefore the addition of a further criterion to DM1 is considered unnecessary and would lead to unnecessary repetition.

(8) Policy DM15 - Should clarify how proposals likely to result in disturbance or harm to legally protected species and their habitat will be assessed (Representation No 10D.239) and FC5.F

The Inspector's attention is drawn to the Council's response contained in **ES 13.3** question 1.

(9) Policy DM16 - For improved clarity, it is recommended that the final sentence of paragraph 7.86 is amended by inserting 'other' before 'SINCs' (Representation No 10D.244) and MC19

Council Response

CCW acknowledge that this amendment would result in a drafting and technical improvement to the plan rather than an improvement to its soundness. The Council does not consider this change necessary on grounds of soundness.

(10) Policy MU1 - Concern regarding the potential impact of development on Rhyd y Blew and Bryn Serth SINCs and the lack of reference to any provision for open space or the retention of the SINCs (Representation No 10D.255) and FC5.I

Council Response

CCW acknowledge that this amendment is a drafting improvement rather than an improvement to the Plan's soundness. The Council does not consider this change necessary on grounds of soundness.

(11) Policy MU1 - A significant area of Rhyd-y-Blew and Bryn Serth SINC's will be lost to development. No details of how the loss of the biodiversity interests is proposed to be compensated for, and how fragmentation of the retained SINC will be avoided or mitigated (Representation No 10D.256)

Council Response

The Council welcomes CCW's support.

(12) Policy TM1.2 - Detailed landscaping proposals should be designed to ensure that the ecological interests of the 3 SINC's are maintained (Representation No 10D.278) We consider this requirement would provide a drafting improvement providing greater clarity to the Plan, but does not affect its soundness.

Council Response

The Council does not consider this change necessary on grounds of soundness.

(13) Policy TM1.3 - Blue Lakes site includes an area of Waun y Pound SINC. Concerned that development at this site will lead to the direct loss of SINC habitat, and that any retained habitat will be lost or damaged as result of increased recreational activity (Representation No 10D.279)

Council Response

CCW acknowledge that the suggested amendment is a drafting issue rather than one of soundness. Council does not consider this change necessary on grounds of soundness.

(14) SSSIs and LNRs are identified on the LDP Constraints Map, rather than on the proposals map. PPW (2011) and LDP Wales specify the need for local and national natural heritage designations to be clearly identified on the LDPs Proposals Map (Representation No 10D.291)

Council Response

The Inspector's attention is drawn to the Council's response contained in **ES 13.3** question 1.

(15) Policy M4.1 - Concerns over the impact of any development on natural heritage interests given the extent of biodiversity and geodiversity interest at proposed Preferred Area Trefil quarry and its proximity to BBNP (Representation No 10D.296) and FC13.A

Council Response

The Inspectors attention is drawn to the Council's response contained in **ES18.7** question 1.