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Blaenau Gwent Local Development Plan
Examination

Hearing Sessions

COUNCIL'S CLOSING STATEMENT

17th July 2012

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Over the last three weeks you have heard a range of evidence from the Council and other participants including local residents, landowners and national organisations.

The Council has sought to demonstrate that the deposit Plan, as amended by Focussed Changes, sets out a locally distinctive and deliverable long term vision and spatial strategy for the Borough up to 2021; consistent with national policy and having regard to the Wales Spatial Plan. The Plan recognises the challenges the Borough faces and seeks to build on the opportunities presented by two large mixed use schemes and the unique characteristics of the area to overcome them.

The issue of sustainable development has been very much at the heart of developing the Plan. This is to be achieved by focusing development within urban areas; encouraging higher densities on appropriate sites; encouraging regeneration of our town centres; protecting and enhancing the green infrastructure network; encouraging sustainable construction and renewable technologies; and promoting measures to reduce the need to travel and the use of travel methods other than the private car.

The Council has sought to demonstrate that this strategy is deliverable through a range of methods including grant funding; partnership working; supporting implementation documents; new initiatives such as the Enterprise Zone and through the determination of planning applications in accordance with the Plan.

There are a number of key issues which have been discussed over the last two weeks which the Council would like to highlight:-

Housing numbers were identified as being challenging, the Inspector pointed out on a number of occasions that the area had not in the past consistently achieved the proposed completion figure. On the other hand there is an argument that this figure should be increased and the Council should provide sufficient homes to provide for a 5.7% vacancy rate. The Council cannot accept the logic for doing this as this works against the Plan's aim to regenerate and improve the existing stock.

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The issue the HBF have is not with the methodology used but with the vacancy figure of 4% used in the calculation to identify the 2021 dwelling requirement. The Council considers that it has provided sufficient evidence to support the reduction of the vacancy rate to 4% by 2021. The Vacant Housing Paper (ES2.1) identified that the vacancy rate has already reduced from 5.7 to 4.9% and that a further 312 empty properties are likely to come forward by 2021.

Any argument to increase the housing requirement figure also needs to be weighed against the ability to deliver the figure, as even if more sites are made available it does not mean that they will be considered to be deliverable over the Plan period. A higher requirement figure would put the Council at a greater risk of not meeting the TAN 1 requirement for having a 5-year supply of readily available land. If we did not have a 5 year supply then developers will be able to ignore the development plan and apply for planning permission on land outside the settlement boundary which would undermine the Plan. The Inspector is also reminded of Welsh Government's comments regarding the likelihood of future projections being lower. Although the census identifies that generally the population is higher than that anticipated by the projections, the household figures are lower for all South East Wales authorities with the exception of Newport. The Inspector is asked to bear in mind the current economic situation and the likelihood that sharing rates will not reduce as anticipated by the WG household projections. The Inspector's attention is also drawn to earlier work undertaken by the Council which identified that only 3,000 **dwelling**s were required to house a population of 71,000 (SD39 appendix 3), this included provision for a 5.7% vacancy rate. It is suggested to the Inspector that a housing requirement figure of 3,500 is sufficiently challenging and should not be raised.

Another key issue has been the logic for including some housing sites and excluding others. The Council has reviewed all sites concerned, re-assessing the sites to reflect issues raised at the examination. Further clarification on this matter is provided as an appendix to the Council's Response to Matters Arising from Session 4. Basically the reassessment

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of the sites in question has led the Council to delete H1.20 Land at Farm Road, Swfrydd. The Council considers that this approach provides a logical and defensible position. There are now no new Greenfield housing allocations outside the settlement boundary and no housing allocations on Sites of Interest for Nature Conservation (SINCs). The Council also suggest the inclusion of Jesmondene Stadium within the settlement boundary which enables it to be developed when stability issues are addressed and viability issues can be overcome.

The loss of 130 units at H1.20 can be compensated by MU1 which can support a further 100 units.

In terms of the housing land supply, the Welsh Government has confirmed that Blaenau Gwent would have a 5-year supply when sites within the Plan are taken into consideration.

The future of Blaina Town Centre is another issue which raised concerns. The Council has taken on board views expressed at the hearing session and proposes changes to manage rather than restrict development. Revisions to the policy now encourage a greater range of uses.

Viability was raised on a number of occasions and this has led to a number of revisions to the Planning Obligations Policy and affordable housing policy to ensure that S106 requirements take account of viability issues. The Council has also been asked to reconsider its position on CIL. The Council is looking at introducing a CIL and work will start next month but a decision on whether a CIL tax is to be introduced will depend on an assessment of viability. In the meantime the Council has reconsidered the ability to meet future requirements through S106 agreements and identified that the issue with regards Abertillery comprehensive school can be overcome. Existing S106 contributions alongside Council funding has been utilised to provide an extension to Abertillery Comprehensive. This has created a surplus of over 200 places meaning that there is no longer an issue for pooling S106 contributions.

A further issue has been the identification of areas where coal working is not acceptable and in particular why the Council did not consider the

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setting of the Brecon Beacons National Park in identifying this area. The Council considered advice in national policy, as set out in MPPW (W24) and MTAN2 (W26), which does not preclude development adjacent to National Parks. It is however accepted that reference should be made to rigorous examination being required on safeguarded land adjacent to the National Park.

The Council is preparing a schedule of Matters Arising Changes as a result of written queries raised by the Inspector; from matters raised at the hearing sessions; the review of the Statement of Common Ground with CCW; grammatical or similar mistakes; and to provide factual updates.

In conclusion, the Council would commend the Plan as being evidenced, coherent, effective, consistent with national policy and therefore **sound**.

And finally, the Council would like to thank Mr Maher for the helpful and professional way in which the Examination has been run, and to Jeanette for all her hard work behind the scenes.