

Blaenau Gwent LDP

Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

<p>-(We note that a SELF-ASSESSMENT based on the soundness tests has been PROVIDED at Preferred Strategy stage (at Appendix2 Statement of Conformity); LDP Manual 6.5.1)</p>	
<p>P1 - Prepared in accordance with the Delivery Agreement including the CIS</p>	
<p><u>Comments</u></p>	<p><u>Suggested Actions</u></p>
<p>We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies (page 78).</p>	<p>N/A</p>
<p>P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)</p>	
<p><u>Comments</u></p>	<p><u>Suggested Actions</u></p>
<p>SA/SEA: We note that:</p> <ul style="list-style-type: none"> - paras 1.4/5 of the Preferred Strategy advises that it has been subject to SA/SEA ; supporting documentation (prepared by Atkins) is the <i>Initial Sustainability Appraisal Report (ISAR)</i> (Nov'08), (+<i>Draft SA/SEA Scoping Report Nov'07</i>). The ISAR is subject of current consultation. <p>Habitats Appropriate Assessment (HRA): We note that:</p> <ul style="list-style-type: none"> - the Preferred Strategy has undergone the first key stage (screening for likely significant effects) of the HRA assessment in discussion with CCW; - para 1.6 of the Preferred Strategy advises that it has been subject to HRA (we note that the SA/SEA & HRA are running in parallel but are clearly distinguishable); supporting document is the <i>Habitats Regulation Assessment Screening Report, Nov'08</i> which is subject of current consultation. - the HRA Screening Report advises that:- there are no European sites within the LPA of Blaenau Gwent (para 3.7); consideration has been given to the 9 European sites identified within a 15km search area around the LPA boundary (para 3.9); consideration of the strategic policies found that 3 policies (SP1,8,11) proposed development that may have significant effects at the European sites(para 3.14) – a precautionary approach is therefore required and it is concluded that further work is required in relation to 2 sites (Cwm Clydach 	<p>N/A</p> <p>Typo at para 3.20 of HRAScreening Report – 9 sites rather than 8?</p>

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Woodlands, Usk Bat Sites) (para 4.4).

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.

<u>Comments</u>	<u>Suggested Actions</u>
<p>We note that section 3 of the preferred strategy aims to provide the national, regional and local context for the LDP and refers to a number of the key relevant plans, policies and strategies:</p> <p>National: One Wales'07, NAW SD Scheme '04, WSP People, Places, Futures '08Update (SE-Capital Network), PPW & CG, MPPW, MIPPS, Circulars, TANs.</p> <p>Regional: Heads of the Valleys Strategy (HOV)-<i>Turning Heads</i> '06; SE Wales Regional Transport Plan '08draft; SEW Regional Waste Plan; S Wales Rgnl Technical Statement on Aggregates; Regional Housing Apportionment '03 based (SEWSPG);</p> <p>Local: BIGw Community Plan 'proud past, bright future''05-'09; Draft Health Social Care and Well-being Strategy 'Healthier Future'; Draft Children & Young People's Plan for BIGw 08-11; Draft BIGw Regeneration Strategy; BIGw Local Housing Strategy 'Quality Streets' '07-'12; Local Biodiversity Action Plan '01-'06.</p> <p>BIGw LDP Evidence Base (14) – Employment Land & Premises '07, Retail –HoV Project '08, annual Town Centre Surveys '08, Housing Market Assessment '07, Gypsy Traveller '07, LANDMAP SLA designation -in prep, annual Joint HLAS'07, HoV Greenspace Provision '07, Rec & Open Space –in prep, Ebbw Vale Northern Corridor –in prep, Aggregates Safeguarding –to be commenced, Waste Site selection –to be commenced end'08.</p> <p>The ISAR (section 3 & Appendix B) also contains the review of Relevant Plans & Programmes</p> <p>Section 9 refers to supporting information: Issues Paper (July 2007), Report of Consultation on the Issues Paper, Draft SA/SEA Scoping Report, Report of Consultation on the Issues and Vision Workshop, Report of Consultation on Vision and Strategy Options (19th Oct 2007), Report of Consultation on Vision and Strategy Options (22nd Nov 2007), Report of Consultation on Vision and Strategy Options (30th Nov 2007), Report on the development of the Vision, Report on the development of the Options, Candidate Site Register, Initial Sustainability Appraisal Report, Habitats Regulation Assessment Screening Report</p> <p>Relationships: Whilst some references are made to some joint working with neighbouring authorities (e.g. housing apportionment</p>	<p>No reference is made in the regional context to neighbouring adopted & emerging development plans.</p> <p>We note that the evidence base is not complete (the timing information provided at para 3.33 is helpful). Ensure appropriate evidence is available and its influence in developing and supporting the strategy is clear (including if studies arrive at differing conclusions from those that have formed the basis for the draft preferred strategy).</p> <p>Ensure that it is clear how the contextual strategies have influenced the Preferred</p>

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<p>waste, gypsy & travellers), the Preferred Strategy document at section 3 gives little indication of the place of Blaenau Gwent within the wider region and of the general relationship with various plans and policies of neighbouring local authorities. Key linkages and influence on the Preferred Strategy need to be clarified. (Note that the soundness self assessment at page 79 says the PS has regard to the cross-boundary issues emanating from the emerging LDP strategies of adjoining LAs and has taken into account regional work for example on waste, minerals and housing.)</p>	<p>key neighbouring authorities in particular</p> <p>Ensure evidence is provided on the areas of joint working identified both within the authority and external organisations.</p>
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C2 It has regard to national policy.	
<u>Comments</u>	<u>Suggested Actions</u>
<p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p><i>N.B. Comments in relation to national policy are included under soundness tests CE1 & CE2</i></p>	<p><i>See comments under soundness tests CE1 & CE2</i></p>

C3 It has regard to the Wales Spatial Plan	
<u>Comments</u>	<u>Suggested Actions</u>
<p>Paras 3.4 –12 specifically refer to the framework setting role of the WSP ('08 update) & the South-East Capital Network Zone.</p> <p>The Preferred Strategy appears generally to provide a good fit both with the Wales Spatial Plan vision for South East Wales and the area work. One exception to this is that there is little mention of the role of Blaenau Gwent within the networked city region envisaged by the Spatial Plan, and there is little mention of Blaenau Gwent's interface/collaboration with its neighbouring Local Planning Authorities.</p>	<p>Provide clarification in support of the strategy of Blaenau Gwent's role within the networked city region, and the interface/collaboration with neighbouring LPAs.</p> <p>Para 3.5 – suggest adding Rhondda Cynon Taf and Monmouthshire to the specified neighbouring authorities, as they are also part of the SE Spatial Plan Area.</p> <p>Para 3.6 –the correct term to use in the first line is the South East Wales Area</p>

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<p>See also further comments under Soundness Tests CE1 and CE2.</p>	<p>Strategy rather than the South East Development Framework, which was the term used while the Spatial Plan was still in draft.</p>
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C4 - Has regard to the relevant community strategy/ies.	
<u>Comments</u>	<u>Suggested Actions</u>
<p>Appears to do so; paras 3.22-25 identifies the community plan, and the soundness self-assessment says that the PD has been prepared in the context of the Community Plan; para 4.5 clarifies that the LDP vision is not the CP vision.</p>	<p>To note.</p>

<p>CE1 The plan sets out 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</p> <p>&</p> <p>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</p>	
<u>Comments</u>	<u>Suggested Actions</u>
<p>The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at sections 4 to 6.</p> <p>The preferred strategy document is generally clear and coherent and the structure of the document properly reflects the logical flow from context and challenges faced to issue identification, through to vision, objectives, options, to preferred strategy and strategic policies.</p> <ul style="list-style-type: none"> - Section 2 provides a useful spatial profile with some good, clear and relevant information. - Section 3 summarises the regional and local planning context, as well as other strategies which have been 	<p>Whilst the information on preparation is very useful for this consultation stage, the deposit plan will need a more succinct format.</p>

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<p>used to inform the preferred strategy. There are useful “spatial dimensions” included such as the health strategy, children and young people’s plan, and Biodiversity Action Plan, all of which should usefully inform the LDP production. (& see comments at C1 above)</p> <ul style="list-style-type: none"> - Section 4 gives the key issues and appears to provide a focussed small number of key critical land-use issues for the plan area. - The LDP vision (para 5.1) is clear and distinctive for the LDP; the process for arriving at it through workshops and consultation is also clear (paras4.5-6). The opening words of the vision recognise that the Council cannot deliver the stated objectives in isolation (rather it will be “Through collaborative working...”), this could be supported by further information with regard to whom and on what the Council will collaborate would be a useful addition. - The LDP objectives (para 5.2) are distinct from the SA objectives (ISAR pages1-3); they appear reasonable and succinct in their coverage of the issues identified in section 4. Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered. - The summary analysis of the development of the strategy options (i.e. 1. regeneration – continuation of UDP strategy, 2. growth and regeneration, 3. balanced and integrated communities) is useful and generally informative). The preferred strategy (and key diagram) (sections 6) appears to be broadly relevant to the area and is land-use. Some clarification for the selection and development of the preferred option (growth and regeneration) are provided (at paras 4.21-25 & Appendix 1) and seem generally reasonable in terms of the SA, local context, and WSP / HoV Strategy context. However, it is not made clear in the main text of the document why Blaina was included as a district/local shopping centre by the LDP Forum and Steering Group (para 4.25); - note that the text at Appendix1 page 76 gives one of the disadvantages of the original option 2 as loss of status / decline of Blaina. It is not clear if there are any strategic sites proposed within the plan area. - Section 3.33 lists background studies that are intended to provide an evidence base to the preferred strategy and will inform the subsequent deposit plan; other supporting documents are listed separately in section 9 (see at C1 above). A number of studies in the evidence base are not yet completed or have not been made available with the PS documentation. 	<p>Vision – supporting information with regard to whom and on what the Council will collaborate would be a useful addition.</p> <p>Consider developing into SMART objectives to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required. PMP</p> <p>Ensure that there is clear evidence supporting Blaina’s status in the finalised draft preferred strategy.</p> <p>Ensure that the deposit plan clearly identifies any strategic sites.</p> <p>Background documents need to be available asap to ensure they can input into the development of the LDP. The deposit plan must be supported and influenced by an appropriate sound evidence base.</p> <p>If any fundamental aspects of the Strategy change when the evidence is</p>
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<ul style="list-style-type: none"> - The strategic policies (section 6) appear to be well aligned to the objectives and the chosen strategy option; they usefully provide clear links to the objectives; however, the supporting text should be developed further in the deposit LDP to indicate delivery mechanisms and timescales for implementation, and the package of policies in the deposit plan should provide greater detail. <i>(See also comments below on monitoring and implementation framework)</i> - A monitoring framework is at section 7 which sets out targets and indicators as a basis for assessing the effectiveness of the strategic objectives. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. At present it doesn't provide any targets/indicators relating to SP18 Minerals and SP19 Waste which have not been linked to the strategic objectives. A developed framework should include strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. <i>(Also see below on Preferred Strategy – deliverability and flexibility; and at Test CE3 below)</i> - Consideration should be given to broad phasing for developing housing and employment land over plan period. Note that there is some indication in relation to housing (policy SP8); but at this stage it is not area or site-specific. - Clarification of how the site assessment process (through the candidate site methodology) will work is provided (section 8); the methodology indicates a 6-stage assessment of all 159 candidate sites which were submitted between April and June '07, with sifting out of unsuitable sites at stages 1 and 3. - A programme for preparation of SPG (including development briefs and masterplans) is provided at para 8.19; the status for some is given as 'approved - but will be revisited', from which it is assumed that this was provided in relation to the UDP - it is important that the SPG is specific to the LDP. 	<p>finalised, the documentation must make clear where such changes occur.</p> <p>Ensure the policies in the deposit plan are supported by information on delivery mechanisms and implementation timescales.</p> <p>Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies.</p> <p>To consider phasing.</p> <p>Ensure SPG is specific to the LDP.</p>
<p>Preferred Strategy - deliverability and flexibility (also see above on Monitoring and Implementation Framework). Whilst there is an indication of the type, scale and location of development required to achieve the strategy, the deliverability of the preferred option needs greater clarification in the deposit plan.</p>	<p>The deposit LDP will need to develop further the type, scale and location of development required to achieve the strategy. Particularly important will be ensuring that the significant developments identified can be delivered, and providing</p>

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<p>Para 4.25 refers to flexibility in the housing and employment land requirements as a response to the current economic climate. The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.</p>	<p>the timescales that are proposed for this delivery. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p>
<p>Paragraph 2.8 contains useful information on why the 3 valleys have been divided into 4 areas following a functional analysis.</p>	
<p>Location of Growth (page 46 & policies SP1,2&3) The strategy as reflected in these policies seeks growth and regeneration in the Heads of the Valleys area, regeneration in the south and the creation of a network of sustainable linked communities to spread regeneration benefits.</p>	<p>The deposit plan should clarify what 'regeneration' means for Blaenau Gwent. Clarification of when regeneration proposals should be delivered should be provided. (<i>see monitoring & implementation</i>) The supporting text should clarify what is meant by 'hubs'. Are they the district and local hubs?</p>
<p>Sustainable Development (page 47 & policy SP4) Gives requirements in relation to new development. It is not clear in the SEA/SA Report (ISAR) how the new policy SP4 has been assessed against SEA/SA objectives, given that this policy is one of the new proposed policies arising from the SEA/SA process. For reference Table F assesses the emerging policies but SP4 Sustainable Development (including SP13 and SP14) have not been assessed.</p>	<p>To clarify</p>
<p>Retailing and Town Centres (page 47 & policy SP5) Policy SP5 (Retail Hierarchy) and para 6.6 defines a new retail hierarchy (with roles and functions) based around Ebbw Vale as a sub regional centre. Complementary uses such as tourism and recreation are considered in conjunction with retail. Whilst the retail strategy flows logically through the Preferred Strategy and appears</p>	<p>The deposit plan and its evidence base should provide clarity about the retail hierarchy, town centre regeneration</p>

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<p>reasonable, the lack of accessible evidence base (i.e. listed at para 3.33 but not available on the web-site) means it is difficult to assess how robust that strategy is.</p> <p>A précis of the action plans mentioned in para 6.7 should be provided. Given that new developments are proposed some indication of the amount of floorspace envisaged during the plan period is required for both comparison and convenience goods.</p>	<p>schemes and floorspace.</p>
<p>Employment (page 48 & policies SP6&7) Policy SP6 (Employment & Diversification of the Economy)</p> <p>Objectives and strategic policies logically flow from evidence base in the Employment Background Paper and the strategy employed given the preferred option is explained. Whilst the evidence base considers the movement of workers between Blaenau Gwent and surrounding authorities it is less clear whether discussions have taken place about neighbour authority allocations or employment strategies. The Preferred Strategy does not appear to identify any strategic employment sites (which would normally be expected at this stage). However, it does make clear the intention to de-allocate some large employment sites in the northern end of the County Borough that are no longer appropriate to the future strategy, which is based around the main urban areas and is therefore more sustainable.</p> <p>Consultants URS estimate a need for 50ha's, made up of 16.4ha (which included a 50% uplift on their initial forecast – para 5.13) plus a buffer of 34 ha for churn (para 5.14 & Table 16 of Background Paper). The Blaenau Gwent Regeneration Strategy (2008) and Blaenau Gwent Community Plan aim to increase activity rates from 66% to 71%, which equates to 80ha's of land (para 6.11 of Background Paper). These aims are reflected in the LDP Preferred Strategy and a range of 50 to 80 hectares of employment land is proposed at this stage in order to provide flexibility given the current economic climate (para 4.25).</p> <p>In the Preferred Strategy, apart from the 50-80ha of land set aside for employment purposes, there is little detail with regard to 'general' employment. The accompanying text is quite informative with regard to tourism but other aspects are less detailed. It would have been beneficial to have some indication of where the 50-80ha of land are and to what specific purpose they are to be allocated.</p> <p>Paragraph 6.14 and the sixth bullet point under Employment' fails to reflect the current economic climate in which the construction sector is not growing. CIL would not lend itself to the purpose stated.</p> <p>Note that potential waste allocations on employment land are identified in SP19, and that the evidence base for waste assessment is scheduled to begin at the end of 2008.</p> <p>There does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring authorities; nor any discussion of how any under provision and proposed 'backloading' of the housing requirement (policy SP8 and para 4.24) may have implications for take</p>	<p>The deposit plan and its evidence base should:</p> <ul style="list-style-type: none"> - clarify relationships with neighbour authority employment strategies / allocations; - identify any strategic employment sites; - be robust and realistic in terms of employment land allocations and their deliverability; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas.

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<p>up of employment land allocations.</p> <p>Policy SP7 (Development of the Tourism & Leisure Sectors) needs redrafting for clarity; it also appears to be very broad and general and could benefit from the addition of some of the detail from para 6.10.</p>	<p>Consider redrafting SP7</p>
<p>Housing (page 50 & policies SP8,9&10)</p> <p>Policy SP8 (Housing Provision)</p> <p>The Preferred Strategy references Ministerial Interim Planning Policy Statement 01/2006, <i>Housing</i>, by accepting the SEWSPG work on regional apportionment (para3.19ff & Background Paper para 2.17ff). The Background Paper on 'Population and Housing' provides details of the Council's own growth forecasts and considers alternative options for future development. Policy SP8 provides for a range of between 2250 and 3000 dwellings and para 4.25 advises that this is in order to provide flexibility given the current economic climate; it would have been useful to clarify this within the supporting text of the policy itself. The figures given for the breakdown into HMAs only reflect the higher end of the range, whilst the delivery figures in the policy which do reflect the range have not been broken down between the HMAs. It is likely that the delivery of the 1450 dwellings on sites permitted or under construction will need to be reconsidered given the current downturn in the housing market. It is not clear if there are any key strategic sites upon which the strategy depends.</p> <p>There does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring authorities</p> <p>Policy SP9 (Affordable Housing)</p> <p>The Preferred Strategy takes account of the housing need identified by the authority's Local Housing Market Assessment, while stating that it would not be feasible to meet this need within the life of the Plan given current build rates and due to the number of committed sites that do not have requirements for affordable housing (para 6.14).</p> <p>The Plan establishes an affordable housing target which takes account of these factors and the limitations on the ability of the planning system to deliver affordable housing. However, it is not clear whether all the options for increasing the target have been explored, for example reducing the threshold in areas of greatest need, where this is economically viable; or reviewing sites in the land supply to assess whether they are now likely to come forward or could be brought forward. It is also not clear whether the target will be delivered by the proposed threshold of 10 units and the site target of 25%, given that about 70% of the Plan's housing requirement is to be delivered on committed sites and sites of less than 10 units.</p> <p>Paragraph 6.18 states that affordable housing will be delivered on a <i>small number of 100% affordable sites, where appropriate</i>. Without any precise definition / location for the small number of 100% sites, affordable housing provision is effectively restricted to the 800 new site allocations of 10 units or over, as paragraph 6.18 makes it</p>	<p>The deposit LDP should:</p> <ul style="list-style-type: none"> - provide robust housing figures which are adequately evidenced; - clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas; - clarify and evidence that all the options for increasing the affordable housing target have been explored; - clarify the reasons for and viability of the thresholds chosen to deliver affordable housing.

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<p>clear that most of the 1.450 committed units are not classifiable as affordable housing. This paragraph also states that between 600-800 affordable housing units are required during the plan period (which is a rather vague and wide spread of figures), which given that the majority will have to be found in the new allocations of 800 units casts considerable doubt as to validity and deliverability of the policy.</p> <p>Policy SP10 (Gypsy Accommodation) Paras 3.33 and 6.19 refer to the Gypsies-Travellers Study (June'07) but it has not been made available.</p>	<p>Ensure supporting evidence base is available.</p>
<p>Transport (page 52 & policies SP11&12) The Draft Regional Transport Plan is referenced at para 2.13; the transport section of the strategy should show clear links to the Regional Transport Plan where applicable. Paragraph 2.36 – see the DFM's announcement on road and rail priorities on 2nd December.</p> <p>Paragraph 6.22 - it is not clear why the strategic and core road hierarchy has not been defined at this stage of plan preparation.</p> <p>Policy SP11 (Transport Infrastructure Improvements) It is not clear as to how many of the proposals are deliverable in terms of a realistic likelihood that the necessary finance is, or will be, available and committed.</p>	<p>The deposit LDP should reflect the RTP and provide clarity on deliverability.</p>
<p>Community Infrastructure (page 53 & policies SP13,14&15) Policy SP14 (Health & Education) This policy fails to indicate where provision will be made.</p> <p>Policy SP15 (Planning Obligations) Consideration of potential developer contributions and the economic viability of development sites needs to be considered in relation to impact on aspects of the associated infrastructure, especially on the provision of affordable housing. The deposit LDP should clarify main obligations related to specific allocations.</p>	<p>The deposit LDP should provide sufficient clarity on location and deliverability.</p>
<p>Built and Natural Environment (page 54 & policies SP16 & 17)</p> <p>Historic Environment Cadw consider that whilst the Preferred Strategy document has an objective and policies to protect, enhance and manage the built environment, some aspects that relate to the historic environment could be improved: - clarification of what is meant by 'built environment' (policy SP17) and whether this encompasses the overall</p>	<p>To consider.</p>

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<p>historic environment;</p> <ul style="list-style-type: none"> - the plan objectives to encompass protection and enhancement of the overall quality of the historic, natural and built environment of the County Borough; - strategic policy to cover the protection, maintenance, enhancement and positive management of the natural and built heritage in the consideration of all development proposals within the rural and built environment; - in addition, in the deposit plan a borough wide policy to cover protection and enhancement of the Borough's historic assets and their settings. <p>In addition, the register of listed buildings 'at risk' is not produced by Cadw but is the responsibility of the local planning authority (para. 2.46).</p> <p>Landscape</p> <p>The relationship between protecting the landscape, and the proposed volume and location of development (including residential, tourism etc), could be explored further in the deposit plan. The forthcoming SLA study (para 3.33) and designations should influence the location of development through the candidate sites process. The deposit plan should set out appropriate policies for landscape and/or SLA (if to be designated), stating (where appropriate) the features or characteristics that require special protection, and how the policies will achieve this. The importance of local landscape character should be considered, possibly as part of strategic policy SP17, as a complement to SP16's concern with the designated landscape.</p> <p>Biodiversity</p> <p>Under the Natural Environment & Rural Communities Act (2006) the CBC has a biodiversity duty in the form of the necessity to promote biodiversity across the full range of local authority functions, so far as is consistent with the proper exercise of those functions.</p> <p>We note the intention to increase the number of SINC's, the recognition within the LDP of the protection and enhancement of ecological resources and biodiversity as a challenge to be overcome, and, the commitment to protect, enhance and manage the diversity of the biodiversity resources of Blaenau Gwent through the identification of ecological corridors. Para 8.19 refers to Biodiversity Supplementary Planning Guidance being in preparation; this should elaborate further on how the principles are to be applied in practice.</p> <p>The Expert Assessments by Ecologists at stage 2 of the Candidate Site Methodology (section 8.7), should consider the potential for the presence of European Protected Species.</p>	<p>To consider.</p> <p>To note and consider.</p>
<p>Minerals (page 55 & policy SP18)</p> <p>Policy SP18 (Minerals)</p> <p>Policy SP18 should refer to known 'resources' rather than 'reserves'.</p> <p>The 'relevant environmental, planning and transportation considerations' which will affect safeguarding are not</p>	

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<p>clarified within the policy; they must accord with national guidance.</p> <p>Aggregates Para 33 makes it clear that the Aggregates Safeguarding study is in preparation. Policy 18 needs to accord with Regional Technical Statement on Aggregates in that resource allocation of 3million tonnes of hard rock should be provided in the LDP and the use of secondary/recycled aggregates promoted (para 3.18 refers). There is a lack of evidence base on landbank figures, amount of dormant mineral permissions, and proposals for restoration. Deposit plan <u>must</u> include Buffer Zone policies.</p> <p>Coal Para 6.31 says <i>Coal resources will also be safeguarded where availability or reserves can be demonstrated</i>. In the deposit LDP the safeguarding should be in line with the Coal Minerals Technical Advice (MTAN2) when issued in final form, (at present with the second consultation on the DraftMTAN2). The proposals map should show the areas where coal working will <u>not</u> be permitted over the plan period, with consideration being given to making reference to this in the minerals policy. Note the statement at para 6.31 that as most new development will be within the existing urban areas the strategy is not affected by the need to protect coal resources; however, the presence of coal resources should have helped shaped the strategy.</p> <p>Safeguarding of minerals should be consistent across boundaries with neighbouring authorities.</p>	<p>The deposit plan must:</p> <ul style="list-style-type: none"> - adequately safeguard mineral resources in line with national policy; - adequately provide for the contribution to aggregates production over the plan period identified in the RTS; - include Buffer Zone policies.
<p>Waste (page 54 & policy SP19) Policy SP19 (Waste) Para 3.33 makes it clear that the evidence base document is in preparation, and para 6.32 that the Council has still to decide which option from the Regional Waste plan it will pursue. Whilst generally on the right track, the deposit plan must clarify the regional search criteria and how Council intends to implement the “sustainable integrated approach” contained in the policy. The supporting text should have confirmed that provision of sites in policy SP19 will provide capacity for an adequate network of facilities, therefore demonstrating that a genuine choice of suitable sites exists and that the B2 locations have enough capacity to accommodate facilities identified as being needed through the Regional Waste Plan.</p>	<p>Ensure deposit plan is sufficiently robust.</p>
<p>Climate Change While Climate Change is given due consideration in the draft Preferred Strategy brief further explanation of how</p>	<p>Ensure clarity in the deposit plan.</p>

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<p>the LDP responds to the effects of Climate Change on the county and how this will affect the strategy is recommended for the deposit plan. Further detail would also be expected on adaptation in order to explain further how Objective 14 will be met.</p>	
<p>Renewable Energy It is disappointing to discover that, despite evidence in para 2.58 that Blaenau Gwent uses a higher share of gas domestically when compared with the regional average, little is being proposed to remediate this in terms of the provision of renewable energy. National policy as contained in the Ministerial Interim Planning Policy Statement and TAN 8 encourages the use of renewable energy and requires local planning authorities to facilitate the development of all forms of renewable energy. The MIPPS states that local planning authorities should undertake an assessment of the potential of all renewable energy resource, renewable energy technologies, energy efficiency and conservation measure and include appropriate policies in LDPs. The Preferred Strategy document does not appear to have followed this approach and there is little consideration of the role and impact of renewable energy in the plan and it does not appear to form part of the core strategy of the plan. The deposit LDP should contain policies for the provision of renewable energy, as outlined in TAN 8, and without consideration at this earlier stage there is a danger that the issue will be an add-on to the plan.</p>	<p>To ensure that adequate consideration and assessment is evidenced; and that the deposit plan contains appropriate policy coverage.</p>
<p>Water and flooding: (Para 2.55) The general approach taken towards flood risk is appropriate and it is assumed that sites in zones C1 and C2 will be excluded during the candidate sites assessment.</p>	<p>To note and ensure.</p>
<p>Water infrastructure (Para 2.53-54) It is stated that sewerage capacity exists to support the preferred strategy. It is therefore assumed that evidence is available to support this statement. The deposit plan should also address the issues raised in the preferred strategy in relation to increased demand for water. Early engagement with Dwr Cymru will provide useful information on the deliverability of development in terms of infrastructure provision.</p>	<p>Ensure adequate evidence. The deposit plan should address the issues in relation to increased demand for water. Early engagement with Dwr Cymru.</p>
<p>Land contamination: It is not clear whether this will be a significant issue in terms of delivery. National planning policy advises that the nature, scale and extent of contamination, which may pose a risk to human health, should be considered as part of plan preparation to ensure that development is not undertaken without an understanding of the risks. Some understanding of the scope to overcome any actual or potential contamination may be a necessary part of understanding the risks if this is to impact on delivery.</p>	
<p>Agricultural land There are no issues of consistency with the national planning policy requirement to conserve the best and most</p>	

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versatile agricultural land (PPW para 2.8.1).	To note
Design Assume that deposit plan will clarify if there are parts of the area that need specific LPA guidance regarding what will be required in design statements (e.g. town centre), and any information on SPG (development briefs, masterplans etc).	Consider for deposit plan
Welsh Language Paras 2.31-32 - consideration appears to have been suitably given to whether the Welsh language should feature in any of the LDP objectives, taking account of PPW paragraph 2.10.2.	

CE 3 There are clear mechanisms for implementation and monitoring	
Comments	Suggested Actions
<p>A monitoring framework is at section 7 which sets out targets and indicators as a basis for assessing the effectiveness of the strategic objectives. Whilst this does include some useful targets and indicators, it needs to be developed further for the deposit plan to provide a better monitoring and implementation framework as this is critical in showing how the strategy will be delivered. At present it doesn't provide any targets/indicators relating to SP18 Minerals and SP19 Waste which have not been linked to the strategic objectives. A developed framework should include strategic and relevant non-strategic policies together with principal implementation routes, responsibility for implementation (including stakeholder involvement), timescale, resource implications, targets, phasing and indicators. Contingencies and triggers for review should also be considered. <i>(as stated at monitoring at Test CE1/2 above; also see above on Preferred Strategy – deliverability and flexibility at Test CE1/2.)</i></p>	<p>Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies. (+ see LDP Manual para 9.5)</p>

CE 4 It is reasonably flexible to enable it to deal with changing circumstances	
Comments	Suggested Actions
<p>Until the monitoring arrangements are properly specified it is difficult to assess how responsive the plan might be to changing circumstances. Monitoring evidence should help inform or initiate future amendments or reviews.</p>	<p>Ensure that the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, strategic take up and other changes.</p>

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