



Strategic Planning and Urban
Renewal Manager
Caerphilly CB Council
Council offices
Pontllanfraith
Blackwood
NP12 2YW

Eich cyf • Your ref:
Ein cyf • Our ref: APP-030-01-004

30 May 2007

Dear Colleague

**CAERPHILLY LOCAL DEVELOPMENT PLAN 2006-2021:
PREFERRED STRATEGY REGULATION 15 PRE-DEPOSIT CONSULTATION
WELSH ASSEMBLY GOVERNMENT RESPONSE**

Thank you for consulting the Welsh Assembly Government regarding the Caerphilly LDP pre-deposit documents. The Assembly is pleased to see progress being made in furthering a development plan for the area within the Delivery Agreement timetable.

I would refer firstly to the new approach to examining LDPs and how the Assembly proposes to address this stage of pre-deposit documents involving the preferred strategy, options and other background material.

In the past our comments at UDP pre-deposit draft stage would have been in the form of specific objections to policy omission, relevance or wording which, if not addressed at deposit or pre-inquiry changes, would be considered by the Inspector in arriving at the recommendations in the Inspector's Report.

Under the new system, the responsibility rests with the local planning authority to ensure that a submitted LDP is sound in procedural terms and enshrines the principles of early community engagement, transparency, consistency, coherence and compatibility to neighbouring authorities. If these principles have not been addressed adequately at the earliest stages of preparation, then the deposit LDP may be considered unsound and unfit for examination.

Without prejudice to the Minister's discretion to intervene later in the process and to the independent examination, the Assembly Government is committed to helping local planning authorities minimise the risk of submitting unsound documents by making appropriate comments at the earliest stages of document preparation, and particularly at the Regulation 15 pre-deposit consultation stage.



To do this, the Assembly looks for clear evidence that the ten tests of soundness (as set out in the LDP Wales and the LDP Manual and explained further in guidance issued by the Planning Inspectorate) are being addressed.

Having considered all the submitted documents provided by Caerphilly CBC under Regulation 15, we acknowledge the amount of hard work undertaken by the authority to reach this stage. We are aware that the authority has been involved in spear-heading much of this work under the new LDP system, in association with the South East Wales LDP Pathfinder Group which is voluntary and commendable.

To ensure your authority secures a sound plan in due course, we have provided a detailed strategic assessment of the Preferred Strategy document (as supported by the other documentation you have provided). We have indicated where evidence of soundness is not immediately clear, and we suggest these matters are discussed with us for clarification. The annex to this letter sets out the detailed comments of the Assembly Government on the Preferred Strategy document; some comments relate to more than one test of soundness and we have provided cross-references where most appropriate.

We have previously provided a number of informal comments to your authority in January and March of this year and met with your officers in April. These discussions highlighted areas of concern both where the documentation has not been clear as well as in relation to structure of the strategy and policy matters. We note your self-assessment and your Appendices but suggest there remain some substantive matters, which need to be addressed well before you produce a deposit plan as outlined below.

- The format and mix of information in the strategy and the appendices need review to improve clarity about the choice of the preferred strategy and its justification, especially as your authority has not opted for the most sustainable strategy. Identification of clear and coherent key issues as well as outlining their relationship to those of neighbouring authorities and from joint work and the LDP vision are fundamental to a sound plan. However, the submitted document is unclear with a list of issues in Section 4/appendices and in Section 5, as well as the internally conflicting themes/objectives in section 6.4. (Note Section 6.5 in the LDP Manual);
- The document displays a good relationship with the Wales Spatial Plan and a clear summary of the spatial approach in paragraph 6.99 but the overall mix of description and policy in Section 6 is confusing and overly complex. The diagram on page 23 and the seven point summary in 6.99 should be your starting points for Section 6 and then should elaborate the zonal approach of the points and the diagram using evidence, themes/objectives and stakeholder/SA processes for their justification. This includes the relationship of the strategy to the strategic site assessments. Some of the description and complexity could also be reduced with clear headings, such as “settlement analysis”, which would separate the context from the spatial strategy for 2020.
- The strategic policies in Section 7 need to be refocused to show how they deliver the strategy in 6.99 and to reduce reliance on general policy and national statements (detail discussed in the attached annex).
- The preferred strategy raises significant national policy issues on waste and minerals.

You should document your response to our comments in your Consultation Report.

Please advise if you would like us to complete the standard response form.

To assist your authority in taking forward the LDP, we recommend that we meet your officers to discuss our response at the earliest opportunity. If you have any queries in relation to the response, please contact Elaine Ancrum or myself.

Yours sincerely

Lesley Punter
Development Plans Team

(enclosure – annexe)

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