
Adroddiad i Gyngor
Bwdreisdref Sirol Blaenau
Gwent

Report to Blaenau Gwent
County Borough Council

Plan submitted for examination on 3 February 2012

Examination hearings held between 26 June and 17 July 2012

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Summary

The Blaenau Gwent County Borough Council Local Development Plan (the Plan) provides an appropriate basis for the planning of the area to 2021, subject to a number of changes. These can be summarised as:

- Redrafting Policies SP10 and DM5 on strategic environmental policy and climate change to make them more locally distinctive and consistent with national policy;
- Adjusting the settlement boundary at Trefil;
- Revising Policy DM2 so as not to stifle innovative development and in order to promote higher density;
- Removing imprecise references about the application of affordable housing policies and contributions to outdoor sports and play

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1 Introduction

- 1.1 Under the terms of Section 64(5) of the Planning & Compulsory Purchase Act 2004 (the Act), the purpose of the independent examination of a Local Development Plan (the Plan) is to determine:
- (a) whether it satisfies the requirements of sections 62 and 63 of the Act and of the regulations pursuant to section 77; and
 - (b) whether it is sound.
- 1.2 This report contains my assessment of the Plan in terms of the above matters, along with recommendations and the reasons for them, as required by section 64(7) of the Act. The starting point for this examination is that the Council considers it has produced a strategy, policies and allocations that are sound.
- 1.3 In this case, the Council requested that the examination proceed on the basis of the deposit Plan¹ as modified by a range of Focussed Changes (FCs)². These FCs were the subject of a separate consultation and a refresh of the Sustainability Appraisal (SA)³. Accordingly, it is appropriate that the examination should proceed on this basis. These FCs have been incorporated into an updated version of the Plan dated March 2012⁴.
- 1.4 In addition to the requirements of the Act and the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005, I have considered the Plan against the soundness tests in paragraph 4.35 of Local Development Plans (LDP) Wales, 2005. Since the purpose of the examination is to determine whether the Plan is sound I have recommended changes in this report only where there is a clear need to amend the Plan in the light of the legal requirements and/or the tests of soundness. These binding changes are set out in Appendices A and B to this report, where they are highlighted in bold type. I am satisfied these changes are in line with the substance of the overall Plan and its policies and do not fundamentally alter the strategy or undermine the Sustainability Appraisal (SA) or participatory processes undertaken.
- 1.5 All duly made representations and the matters raised orally at the hearings have been considered. Given the focus of the

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a consistent way of spelling the settlement Swffryd/ Sofrydd in the Plan, accompanying appendices and Proposals/Constraints Maps, identifying MU1 in the Delivery and Implementation section as targeted to deliver 805 homes to be consistent with other references in the Plan). Adding the names of key towns and settlements would make Figure 2: Key Diagram easier for an outsider to read. The Council will also need to make other minor updates to this figure to reflect various MACs.

Other matters raised after the hearings

- 1.10 The Minister for Transport approved the dualling of the Heads of the Valleys Road (A465) between Gilwern and Brynmawr on 19 July 2012⁶. I have taken his decision into account in preparing my report.
- 1.11 Mynydd Llangynidr was designated as a Site of Special Scientific Interest (SSSI) in August 2012⁷. I heard submissions at the hearings that this designation could be subject to judicial review. For the purposes of this report, I assume its status as an SSSI will stand.
- 1.12 The Council responded to correspondence from the Home Builders Federation in connection with MAC C39 and MAC C40 around the merged housing allocation and commitment sites Policy H1/HC1. The Council has suggested a rewording of these MAC changes⁸. I have written my report on the basis of the revised wording offered.

Structure of report

- 1.13 Section 2 of this report considers procedural issues in the Plan. Thereafter I have identified and addressed the following main topics on which the soundness of the Plan turns. These are:
- the spatial strategy and vision including settlement boundaries and overview of policies to support the strategy (section 3);
 - housing numbers, site selection phasing and densities (section 4);
 - affordable housing, housing for gypsies and travellers and sheltered housing (section 5);
 - town centre management and retail development (section 6);
 - employment (section 7);

minerals and waste (section 10);
transport (section 11);
design, heritage and the role of the Welsh language (section 12); and
infrastructure provision, implementation and monitoring (section 13).

1.14 At Section 14 of this report, I briefly review other topics raised in the examination such as the use of the Constraints Map and agriculture and thereafter conclude why I consider the Plan to be sound subject to the changes identified.

2 Procedural Tests

- 2.1 The LDP has been prepared to meet the deadlines set out in the Council’s revised Delivery Agreement ⁹ and is consistent with its Community Involvement Scheme. On this basis, the Plan complies with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 including requirements relating to the consultation, advertisement and the publication and availability of prescribed documents.
- 2.2 The Plan has also been subject to Sustainability Appraisal (SA) including Strategic Environmental Assessment (SEA). FCs put forward by the Council as part of the examination process have likewise been tested where necessary for any impacts they have upon the SA and SEA ¹⁰.
- 2.3 In accordance with the Habitats Directive ¹¹ a Habitats Regulations Assessment (HRA) of the Plan has been undertaken ¹². An HRA Screening report was undertaken along with a subsequent Appropriate Assessment. This research concluded that no significant effects upon the integrity of the European sites ¹³ within the Plan area or in adjacent areas are likely to occur (either alone or in combination with other plans or projects) as a result of implementing the Plan.
- 2.4 Accordingly, procedural tests P1 and P2 have been satisfied and the relevant legal requirements complied with.

⁹ SD13

¹⁰ SD24, SD04a, SD04b and SD04c

¹¹ European Habitats Directive (92/43/EEC)

¹² SD05, SD06

¹³ Refer to Planning Policy Wales Edition 4, paragraph 2.4.6. This document can be found in W41 in the examination. It is hereafter referred to as PPW4 in this report.

3 Spatial Strategy and Vision including Settlement Boundaries

Is the spatial strategy and vision appropriate?

- 3.1 There is a broad consensus that the Plan should seek to promote the economic, social and environmental regeneration of the county borough. The only realistic alternative to a strategy that actively promotes growth would be one of further population decline or stagnation¹⁴.
- 3.2 The Plan acknowledges challenges over recent decades following the decline of the coal and steel industries and associated manufacturing which have been reinforced by current economic conditions. It seeks to reverse population decline by promoting major new development to help attract private investment which will diversify the local economic base allied with extensive public infrastructure investment to support economic growth and raise skills levels among local people. At the same time, the Plan seeks to preserve, enhance and promote the county borough’s distinctive landscapes and environmental assets.
- 3.3 The vision and spatial strategy for the county borough is clearly articulated and derived from an extensive evidence base underpinned by a lengthy consultation programme¹⁵

that remove sites formerly allocated for housing but which did not, as of 2009, benefit from an extant grant of planning permission. The logic for the Plan’s settlement boundaries is soundly based

assess future projections. Such a “business as usual” approach fails to take account of efforts to promote regeneration through the catalyst of new rail and road infrastructure which will improve the area’s connectivity to major employment centres and potentially make the area more attractive to external investors. It further fails to take account of Welsh Government statistics which anticipate an element of natural growth in the population. A revised monitoring indicator now indicates a trigger review by the end of 2016 should the Council fail to meet its housing target.

- 4.5 The Council has merged by way of MAC C39 Policies H1 and HC1 which cover housing allocation sites (“H” sites) and housing commitment sites (“HC” sites) which benefit from planning permission. These changes help the reader understand more clearly on an area by area basis where new housing has been approved or is likely to be supported. The Home Builders Federation raise concern that the effect of this merger is to give HC sites the same status as H sites and, in doing so, complicate the Housing Land Availability process. I recommend the revisions to MAC C39 and C40²⁷ which make clear that they do not and that steps will be taken to review why any of the HC sites have not been developed when a planning permission has expired in a future review of the Plan.

Principles of housing site selection

- 4.6 The Council has adopted a carefully audited process for assessing candidate sites for housing. The screening criteria chosen pay close attention to Government guidance in PPW4²⁸.
- 4.7 The performance of allocated sites was tested in the examination. This has led to the Council reviewing individual sites²⁹ and removing H1.20 but this has not fundamentally changed the Council’s logic for site allocation and the identification of HC sites as expressed in its closing statement³⁰. In summary, the Council has prioritised PDL sites inside settlement boundaries or identified those HC sites on the urban fringe where there is an extant planning permission. No new greenfield sites are proposed. There are no housing allocations on Sites of Interest for Nature Conservation (SINCs). All alternative sites promoted by objectors to the Plan have been soundly ruled out for a mix of landscape and ecological reasons or because they would represent inappropriate development in a green wedge.
- 4.8 A number of representors propose alternative sites to those allocated in the Plan suggesting the settlement boundaries be extended. Given that the Council has demonstrated more than enough housing land

²⁷ Assailed by PH2_BGCBC

²⁸ PPW4, paragraph 9.2.9

²⁹ MA4.R

³⁰ MA21

within settlement boundaries to meet future need and the foregoing logic for its final allocations, there is no need to allocate any additional sites ³¹. Nonetheless, four sites warrant more discussion.

T, Pwdr (AS(N)21)

- 4.9 There is no doubt that the Council at one time actively supported this site’s development for housing although planning permission on the land has now lapsed. A fresh planning application for 73 homes was subsequently refused and an appeal dismissed in January 2010 ³².
- 4.10 The smaller site area that formed the subject of discussion at the hearings may be suitable for live-work but only in the same way that others inside the settlement boundary may be. The provision of such accommodation is not a strategic issue for the county borough. There is therefore no obvious case to support the development of this site for such purposes. I do not consider it necessary that the site be allocated for other forms of housing either.
- 4.11 Significant residential development would be likely to conflict with its designation within a Special Landscape Area of high visual and sensory value that would be visible from a number of receptors. There are conflicting views on how the site’s SINC status came about but my decision has not turned on this matter. Moreover, I have indicated elsewhere in this report why I am satisfied with the approach the Council has adopted in establishing SINC’s across the county borough and their role in alerting a pot7(r hou1.[(coun8w8(of 1.00547 Tw 32186 TD1uopne8

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plans to indicate that an alternative built form or other land use on these two sites would be financially viable.

- 4.14 Both sites relate logically to adjacent built forms in the area and are located outside the Six Bells SINC (ENV3.111). However, their most important attribute as development sites is that they are two of the very few parcels of land in the Lower Ebbw Fach inside the settlement boundary that can be easily developed for housing. With the removal of H1.20 in Swffryd, there is additional expectation that land in Six Bells should deliver a proportion of the south of the county borough’s housing needs. The designation of these two sites for housing is soundly based, especially in combination with a new school (ED1.2).
- 4.15 The Council acknowledges the distinctiveness of the Guardian monument in MAC S24. It is likely to appear on a future schedule of locally listed buildings. The reference in the supporting text to Policy DM18 (as amended by MAC S23) makes clear that its setting will have to be taken into account in any final development proposals on adjacent land. It is not necessary to impose a viewing corridor or other designation on the Constraints or Proposals Maps to show how its setting should be protected. It has been suggested the proposed school (ED1.2) be located on the upper plateau at Six Bells instead. This is likely to be a significantly more intrusive form of development and would adversely affect the setting of the Guardian by reason of its height and raised position in a way that well designed housing would not.
- 4.16 Outside of the development plan adoption process, the Council stated it would prepare a revised planning brief to guide development on the site and will work with local community groups to publicise it. The version of the brief I saw pre-dated the construction of the Guardian monument. This deficiency does not make the site allocations in this area unsound.

Housing densities

- 4.17 The Council stated it had calculated yields on its housing allocation sites on the assumption that they will deliver on average 35 dwellings per hectare (dph). It became clear under examination that the Council had underestimated the potential yield on MU1. Other major sites such as MU2 with good access to public transport are likely to be built out at densities in excess of 35 dph. On the other hand, the final yield on other sites may be reduced owing to topographical and landscape features (H1.19) or, potentially, the need to address coach access to the new Willowtown school when the former school site (H1.1) is redeveloped.
- 4.18 There is conflicting evidence on the density of sites under construction. Those who challenge the 35 dph principle make the case for land release outside of settlement boundaries. The Plan now

aims to promote higher density development, an appropriate course of action in an area with a predominantly urban population and one that is consistent with PPW4³³. I recommend revisions to Policy DM2 (MAC S08 and MAC S09) which remove the requirement for new development to have regard to the density of surrounding uses as the changes will help make more effective use of existing urban land located close to existing and planned infrastructure. The Council’s revised monitoring indicators back up this commitment to higher

5 Affordable Housing, Housing for Gypsies and Travellers and Sheltered Housing

Evidence base for affordable housing policy

- 5.1 The Council has had regard to PPW4 and TAN2 in articulating Policies SP4, DM4, DM8 and H1/HC1. It has an extensive evidence base outlining local housing need ³⁵ and has also assessed the viability of meeting this need. Accordingly, its policies set a target of at least 335 new affordable homes and establish minimum site area and unit triggers above which affordable housing policy will apply.
- 5.2 The 2007 Local Housing Market Assessment suggests 34% of all new dwellings should be either socially rented or intermediate housing to meet future housing needs ³⁶. However, viability is the principal challenge to providing this level of affordable housing especially when such contributions are sought on top of developer contributions towards infrastructure reasonably required with new development and abnormal land costs in an area with a legacy of mining and industrial activity. A 2010 DVS study ³⁷ recommended at least 10% affordable housing units should be sought on sites of 10 or more dwellings and 15% on sites over 100. These recommendations were made on the caveat that the figures be reviewed periodically and that affordable housing requests be considered on a scheme by scheme basis. The Council reviewed this report and found it unlikely ever to achieve more than 10%, having conducted its own more detailed assessment of individual sites ³⁸.

Review of thresholds for affordable housing trigger

- 5.3 Policy DM8 sets two triggers when affordable housing policy will apply. The first of these is for all developments of 10 or more dwellings consistent with DVS’s advice. The Council also seeks to apply affordable housing contributions on sites over 0.28 hectares. This second area-based trigger has been established on the assumption that sites should deliver a yield of 35 dph. The use of a site area trigger is locally justified and has two planning advantages. First, it is a lever to promote higher density in a predominantly urban local authority. Secondly, it prevents developers from avoiding affordable housing contributions by

Gwent is more akin to those of neighbouring Heads of Valleys urban local authorities where 10 unit thresholds have generally been applied in adopted LDPs³⁹. In the absence of any firm alternative numerical and site area trigger, I find the Council’s position to be soundly based.

Review of percentages sought

- 5.5 The requirement of “at least 10%” provision of affordable housing causes more concern. It is unclear because it is imprecise and effectively requires every development to be the subject of negotiation including the preparation of Three Dragons or equivalent viability studies. This in itself raises the cost and time taken to deliver development. I therefore recommend the revisions to Policy DM8 in MAC S18 and MAC S19 which propose a 10% figure for on site contributions subject to viability as this would provide a let out if the project were to be unprofitable otherwise.

- 5.6 It has been suggested that even a 10% provision is too high as house prices in Blaenau Gwent have fallen since the DVS study was released. An extract from a Savills forecast for Wales would imply that local house prices may not reach the values in the DVS study until after 2016⁴⁰. The house building sector is also likely to face additional costs due to changes in the Building Regulations. Falling or stagnant house prices in combination with unquantified increases in the cost of house building will act as barriers to viability over the short to medium term.

- 5.7 Nonetheless, the Plan sets out local planning policy until 2021. Local house prices may perform differently to the Savills forecast for Wales due to local betterment initiatives such as improved transport links. It is appropriate that some provision of affordable housing be sought consistent with national policy. The revised position of 10% subject to viability broadly accords with the evidence submitted.

100% affordable housing sites and part contributions

- 5.8 I recommend revisions to the merged Policy H1/HC1 in MAC C39 which remove references to sites where 100% affordable housing will be sought (marked # in the Plan) initially because these references may not be accurate. More importantly, though, the Council’s stated position is not consistent with revised Policy DM8. Removing references to 100% affordable sites does not prevent them being developed by registered social landlords as solely affordable schemes.

³⁹ Appendix A3.2 of the Local Development Plan (LDP) for Blaenau Gwent, 2005. See also the Savills report ‘The Welsh Housing Market: A Review of the Housing Market in Wales’ (2005) and the Savills report ‘The Welsh Housing Market: A Review of the Housing Market in Wales’ (2005) and the Savills report ‘The Welsh Housing Market: A Review of the Housing Market in Wales’ (2005).
⁴⁰ ES3.2

- 5.9 The Council agreed at the hearings that detailed guidance on the application of affordable housing policy will be set out in a revised Supplementary Planning Guidance (SPG) on Planning Obligations (acknowledged in a number of minor changes and most notably MAC M16, MAC M17 and MAC M23). A revised SPG is also the proper document to clarify detailed matters such as the application of “part dwelling” contributions on schemes over the threshold of 10 dwellings as well as the exceptional circumstances when off site contributions may be appropriate. 41

Provision of rural affordable housing

- 5.10 Blaenau Gwent is a largely urbanised local authority with a very limited rural economy⁴². It is not one where households outside settlement boundaries face competition in the housing market from outsiders seeking holiday homes. It follows that there is not great pressure to provide rural affordable housing, especially given the challenges in delivering the amount of housing allocated in urban parts of the county borough. These challenges are heightened by the upward adjustment in the yield anticipated at MU1 and by acknowledging that the former Jesmondene Stadium site could also come forward as a windfall site. In this context, Policy DM9 as published has the potential to extend settlement boundaries across the whole of the county borough with no obvious pressing justification given the challenges anticipated in delivering the current target and a housing policy that seeks to direct new development within settlement boundaries at higher densities.
- 5.11 MAC C27 acknowledges an untidiness in the articulation of published Policy DM9. It still recognises the importance of planning for

6 Town Centre Management and Retail Development

Hierarchy of centres – the role of Ebbw Vale

- 6.1 Ebbw Vale’s identification in Policy SP3 as a principal town centre above Tredegar, Brynmawr and Abertillery is consistent with the WSP which acknowledges this town as a sub-regional hub. It enjoys some of the best public transport links in the county borough which will be improved through the extension of rail services from Ebbw Vale Parkway and an improved bus interchange. New civic uses in the vicinity will reinforce its role.
- 6.2 The introduction of a primary retail area for this centre and the boundaries identified appear logical as this development management tool identifies areas where the loss of A1 uses (shops) will be resisted. The Council has also identified two areas outside this core where it seeks to promote new retail uses (sites AA1.1 and AA1.2). The identification of these sites appears soundly based.

Tredegar, Brynmawr and Abertillery District Town Centres

- 6.3 The boundaries for each of these centres and primary retail areas appear appropriate and logically drawn.
- 6.4 Much of the retail offer associated with Brynmawr town centre is located at the Lakeside Retail Centre which is situated within the Nantyglo and Blaina Town Council boundaries. Notwithstanding this administrative matter, there is no merit in considering an extension of the town centre boundaries as far as the Lakeside Retail Centre until Site MU3 is redeveloped. The former Kwiksave site forms part of a fringe parade of retail and leisure uses that is physically connected to the rest of the centre. It is therefore not appropriate that the site in isolation, or the block of which it forms a part, be considered as a separate mixed use allocation. Policy DM6 would not rule out a mixed use development on the site provided it contained retail uses at ground floor level.

Development management Policy DM6

- 6.5 The establishment of a policy to manage town centre land uses is, in principle, soundly based and consistent with PPW4. However, Policy DM6 has two serious flaws. First, it seeks to distinguish between different uses within the A3 (food and drink) Use Class. In the absence of any firm commitment from the Welsh Government to amend the law, the imposition of a policy that makes such a distinction risks being *ultra vires* as it favours some activities such as restaurants over others such as hot food take aways and aims to prevent developers from carrying out a change of use which does not require planning permission. Secondly, the research to support the policy shows that a number of centres exceed the combined 11% threshold of hot food take aways and public houses. The effect of the

policy, as written, would be to prevent any such uses in these centres.

6.6 MAC S14 addresses these shortcomings because it removes the distinction between different A3 uses. The removal of the phrase “in close proximity” is also necessary as it is imprecise. Detailed Council-wide guidance on how hot food take aways and public houses should be managed can be left to an updated SPG note. I also recommend amendments to the supporting text of this policy (MAC S15) to be consistent with MAC S14.

6.7 Other revisions to the policy such as substituting the word “restrictions” with “management” in MAC S14 make the policy sound more positive and generally improve the Plan by giving greater certainty to the types of uses which will be supported. References to the A2 Use Class (financial and professional services) and other uses including places of worship and community facilities are helpful. It is appropriate that such uses be supported on town centre sites.

Blaina

6.8 Blaina is smaller than Tredegar, Abertillery and Brynmawr centres in terms of floorspace and has no obvious retail core to protect given the mix of housing, retail and other uses that exist side by side. These factors justify its status as a local town centre rather than as a district town centre but it is nonetheless one where retail uses should still be protected. The Council propose to contract the centre’s southern boundary relative to the UDP boundary. These alterations appear logical as the revised boundaries remove a concentration of

housing but still lie vacant. The Council’s revised policy clearly states that conversion would only be considered as a last resort. The revised wording of the test that a developer would have to comply with is straightforward. I heard no firm evidence on how alternative solutions such as putting up temporary signs on vacant shops would be funded or whether this type of initiative would actively address the decline the centre has experienced over time.

Retail and leisure provision

- 6.12 The bulk of the 10,200 sqm of additional retail development is anticipated to be delivered at two locations not far from Ebbw Vale town centre (Rhyd y Blew - R1.1 - and Tesco North West Approach R1.3) and an extension to the Festival Shopping Outlet Centre (R1.2) close to Ebbw Vale Parkway station. These sites already have some retail floorspace and/or benefit from an extant grant of planning permission. None of these sites are in a town centre and I have not seen any evidence of sequential testing of other sites. Works on R1.1 have technically started. I do not have any indication that R1.2 and R1.3 will not be implemented. Therefore, as these three sites are existing commitments and there is no realistic possibility of the Council revoking these grants of planning permission, it would be inappropriate to review the identification of retail floorspace on these sites in the Plan.
- 6.13 MU2 could not be easily developed as an extension to Ebbw Vale town centre given the difference in site levels between the two areas. Significant amounts of new retail floorspace would risk creating two competing centres adjacent to one another. In any case, it is not appropriate that this site play a significant retail role in the county borough. Instead, the Council has identified two sites (AA1.1 and R1.4) where modest extensions of the centre’s retail offer could be achieved. The delivery of Market Square (AA1.2) is dependent on project T5.2 as the site is presently cut off from the rest of the centre. On the basis of the evidence submitted at the examination, I conclude there is a realistic chance of this road project being completed and subsequent improved pedestrian connectivity between Market Street and the rest of the town centre being provided.
- 6.14 None of the sites inside Ebbw Vale centre could accommodate a commercial leisure scheme of the scale anticipated to compete with Merthyr Tydfil. It follows that MU1 is appropriate for such a use. A commercial leisure development would also act as a catalyst to release a much larger site.
- 6.15 I have considered whether sites MU1 and MU2 should be identified for any additional retail provision at all. Notwithstanding their proximity to Ebbw Vale centre and other sites where there is a commitment for additional retail development, there may be some merit in a “corner shop” scale of development to meet the very localised needs of the

1,325 new households anticipated to live on these two sites.
However, any new retail use would have to be incidental to the scale

7 Employment and Tourism

Employment land designation and protection

- 7.1 The geographic distribution of employment land in the Plan appears broadly justified. It is appropriate to direct the majority of new employment generating uses to the north of the county borough, especially to sites that will benefit from the dualling of the Heads of the Valleys Road such as MU1 and Rassau Platform A and B (EMP1.4 and EMP1.5).
- 7.2 There is also merit in distributing employment use sites across the county borough including those close to town centres (for example, the Crown Business Park in Tredegar – sites EMP1.8 and 9) given the difficulties of connectivity and low levels of car ownership. The distribution of employment sites further justifies the retention of the Glandwr and Llanhilleth Industrial Estates (EMP2.20 and 2.21) for employment rather than housing despite their proximity to Llanhilleth station. The Marine Colliery site (EMP1.7) has the potential to service the quarry south east of Cwm or possibly be developed in its own right.
- 7.3 The designation of existing employment land in Policy EMP2 into strategic, primary and secondary sites and business parks along with Policy DM11 derive from the employment background paper⁴⁶. The types of uses anticipated on strategic sites, primary sites and business parks logically follow from surrounding uses and the quality of individual sites’ road accesses.
- 7.4 Some flexibility should be applied to uses on secondary sites that do not have the same locational attributes as other employment sites. This would include offering support for *sui generis* and waste management-related uses. However, the supporting text to Policy DM11 inappropriately allows uses outside the B Use class such as gyms and crèches on such sites when it would be more appropriate to direct them in the first instance to town centres which benefit from better public transport and to help them fulfil their roles as the most appropriate locations for retail, leisure and other complementary functions consistent with Welsh Government policy⁴⁷. I therefore recommend MAC S20 which addresses this shortcoming.

Employment land allocation

- 7.5 The allocation of 50 hectares of employment land for “delivery” over the lifetime of the Plan in Objective 3 and Policy SP8 involves the development of 10has the e 10h-14.51e6

the next nine years. A plot ratio closer to 0.4:1 - as other participants in the examination hearings have suggested - would imply an additional 200,000 sqm space being brought onto the market.

- 7.6 From the outset the Council accepted this target is ambitious. I saw no convincing evidence to indicate that, even with Enterprise Zone status, the delivery of the Heads of the Valleys Road dualling, EU Convergence support and a dramatic improvement in the UK’s economic activity, all of these sites could be delivered over the next nine years. Three factors lead me to this view.
- 7.7 First, the Employment Sites and Premises Study recommends the de-designation of sites that the Council has kept in the Plan ⁴⁸. Secondly, I heard evidence that some developers obtain planning permission but have not progressed sites but, rather, seek to renew these consents. Thirdly, all of the LDP sites have been carried over from the UDP. None of them have been progressed. No planning application has been submitted on the Rhyd y Blew parcel of land on MU1. It is difficult to see how the county borough could deliver up to 200,000 sqm of additional employment floorspace in nine years. At face value, the Council’s employment land allocation policy might be said to be inconsistent with Soundness Test CE2.

7.8

Festival and Blue Lakes sites (TM1.2 and TM1.3) may be environmentally sensitive given their proximity to SINC’s. However, it is not necessary for reasons of soundness to specify the extent of landscaping required or to clarify how nearby habitats should be

8 Community Life, Education and Open Space Provision

Community life

- 8.1 An extensive review has been carried out of local community infrastructure ⁵⁰. There is not a pressing demand to provide new community infrastructure given the negligible growth in population anticipated until 2021. The allocation of land for new outdoor leisure activity and a community centre in Policies L1 and CF1 have been based on known initiatives by the Council and others. Works on new healthcare provision at MU2 have been completed.
- 8.2 The Council has attempted to record the number of community and youth centres but has not audited them to assess how well they are used or their state of repair. It is therefore not clear if the county borough has a surplus of facilities or if buildings are underused. This in itself is not a reason to find the Plan unsound. It suffices that

size in terms of school numbers to be educationally and financially viable. Linked to this, the Council seeks to promote high quality schools as a manifestation of its commitment to transform historically low levels of educational attainment⁵³. A number of former schools across the county borough have already been demolished or converted to community use. Others have appropriately been allocated as housing sites. New secondary school provision for the 14-19 year old cohort will be accommodated at The Works site (MU2). This site will also accommodate a relocated special school.

- 8.5 Turning to mainstream primary sector provision, Ysgol Gymraeg at Brynmawr has already relocated to a new site (ED1.1). A new primary school is proposed at Six Bells (ED1.2) to serve the south of the county borough. The case for developing this site is that it will replace and consolidate Bryngwyn and Queen Street primary schools which both have limited play space and cannot be easily adapted for disabled access⁵⁴. I am not convinced the former Arael School could accommodate a 300 place primary school and provide sufficient play

- 8.9 All local residents live within 2km of major green spaces but only 65% of residents live within 400m of local green space. Improvements to existing rights of way referred to in supporting text to Policy SP6 over the period 2009 to 2014 will significantly increase the number of residents who can access local green space.
- 8.10 The Council's research also confirms a quantitative shortfall of outdoor sport and playing fields - as opposed to natural greenspace - relative to the FiT standard on a ward by ward basis⁵⁷. This provides a sound basis for Policy DM13 which requires new development to make financial contributions in those parts of the county borough with a deficiency. I recommend MAC C31 which deletes the term "qualitative deficiency". This term is imprecise and could be potentially used to demand contributions in association with any development where the Council considers that local play space is not well maintained.
- 8.11 Policy DM4, as amended by MAC S10, also makes the important and necessary clarification that requests for infrastructure provision such as play space will only be sought subject to viability. I recommend this change as necessary for reasons of soundness given that economic viability is a critical issue in securing new development across the county borough. Overall, the Council's approach to planning for open space provision is soundly based.

⁵⁷ The Council's research also confirms a quantitative shortfall of outdoor sport and playing fields - as opposed to natural greenspace - relative to the FiT standard on a ward by ward basis.

9 Sustainable Development, Environmental Management and Landscape Considerations

Sustainable development

- 9.1 The Council has had regard to European, UK, national and regional policies and initiatives in the articulation of its policies to support sustainable development⁵⁸. A commitment to addressing climate change in Policy SP7 is reflected in housing policies that make more efficient use of land inside settlement boundaries at higher densities, thereby reducing the need to extend urban settlements into the countryside. Transport policies prioritise more sustainable modes while recognising that the dualling of the A465 (T6.1) is critical to promoting local economic regeneration.
- 9.2 The Council wishes to promote greater take up of renewable energy and has paid close regard to the Welsh Government Practice note⁵⁹ in the articulation of its policies. The Council’s research demonstrates there are only limited opportunities to generate wind, solar and hydro electricity to meet the county borough’s future energy needs. The revised Policy DM5 therefore has the effect of encouraging all major development to incorporate some on-site renewable energy. This redrafted policy on top of other local initiatives referred to in the Plan - for example, the proposed Energy Centre on MU2 and other district heating systems being developed on sites such as the Learning Centre and Council’s Leisure Centre - represents an appropriate and pragmatic response. It is not national policy to require all new development to generate its own energy so it is not necessary to lower the threshold suggested by the Council.

Environmental management

- 9.3 Policy SP10 (as revised by MAC S04) identifies a strategic approach to protecting the county borough’s environmental assets. The indicative layouts of individual sites of environmental importance such as MU1 and other development management policies clearly show how sites of environmental and nature conservation interest will be preserved and/ or enhanced.
- 9.4 I have indicated above that Policy SP10 as amended is more locally distinctive. However, there is one minor but important change that would better align this revised policy with national policy. Criterion (f) of the redrafted policy refers to biodiversity and falls short of the broader definition of “nature conservation” set out in TAN5⁶⁰. I recommend therefore this textual change to ensure the policy is more accurately aligned with national policy and embraces features such as rivers

SP10 greatly improve the Plan in that they state more clearly which

sound planning sense in the Council prioritising areas ⁶⁴ as this will inform future bids for Welsh Government support.

- 9.9 The identification of Llanhilleth Pithead Baths (ENV4.4) is appropriate given its prominence on the public highway and the constraints in developing it. It has benefited from planning permission for housing but this has expired. There is some uncertainty about Welsh Government funding to help release this site but this should not stop it from being identified as a priority over the rest of the life of the Plan. It is not necessary and indeed inappropriate to identify firm end uses for this site now as they will depend on the final cocktail of grant and private sector investment. The merits of any development proposal can be assessed at the planning application stage.

Landscape considerations

- 9.10 The Council has commissioned research to identify SLAs ⁶⁵, areas so defined on the basis that they are locally important, are of high quality and value and contribute to the image of the area and where Policy ENV2 requires development to conform to the highest standards of design appropriate to the character of the area. The Council’s methodology is consistent with the Countryside Council for Wales (CCW) guidance ⁶⁶ and therefore with PPW4.

- 9.11 Blaenau Gwent has a distinctive geography (para 5.5 (c) (i) (f) (j) (k) (l) (m) (n) (o) (p) (q) (r) (s) (t) (u) (v) (w) (x) (y) (z) (aa) (ab) (ac) (ad) (ae) (af) (ag) (ah) (ai) (aj) (ak) (al) (am) (an) (ao) (ap) (aq) (ar) (as) (at) (au) (av) (aw) (ax) (ay) (az) (ba) (bb) (bc) (bd) (be) (bf) (bg) (bh) (bi) (bj) (bk) (bl) (bm) (bn) (bo) (bp) (bq) (br) (bs) (bt) (bu) (bv) (bw) (bx) (by) (bz) (ca) (cb) (cc) (cd) (ce) (cf) (cg) (ch) (ci) (cj) (ck) (cl) (cm) (cn) (co) (cp) (cq) (cr) (cs) (ct) (cu) (cv) (cw) (cx) (cy) (cz) (da) (db) (dc) (dd) (de) (df) (dg) (dh) (di) (dj) (dk) (dl) (dm) (dn) (do) (dp) (dq) (dr) (ds) (dt) (du) (dv) (dw) (dx) (dy) (dz) (ea) (eb) (ec) (ed) (ee) (ef) (eg) (eh) (ei) (ej) (ek) (el) (em) (en) (eo) (ep) (eq) (er) (es) (et) (eu) (ev) (ew) (ex) (ey) (ez) (fa) (fb) (fc) (fd) (fe) (ff) (fg) (fh) (fi) (fj) (fk) (fl) (fm) (fn) (fo) (fp) (fq) (fr) (fs) (ft) (fu) (fv) (fw) (fx) (fy) (fz) (ga) (gb) (gc) (gd) (ge) (gf) (gg) (gh) (gi) (gj) (gk) (gl) (gm) (gn) (go) (gp) (gq) (gr) (gs) (gt) (gu) (gv) (gw) (gx) (gy) (gz) (ha) (hb) (hc) (hd) (he) (hf) (hg) (hh) (hi) (hj) (hk) (hl) (hm) (hn) (ho) (hp) (hq) (hr) (hs) (ht) (hu) (hv) (hw) (hx) (hy) (hz) (ia) (ib) (ic) (id) (ie) (if) (ig) (ih) (ii) (ij) (ik) (il) (im) (in) (io) (ip) (iq) (ir) (is) (it) (iu) (iv) (iw) (ix) (iy) (iz) (ja) (jb) (jc) (jd) (je) (jf) (jg) (jh) (ji) (jj) (jk) (jl) (jm) (jn) (jo) (jp) (jq) (jr) (js) (jt) (ju) (jv) (jw) (jx) (jy) (jz) (ka) (kb) (kc) (kd) (ke) (kf) (kg) (kh) (ki) (kj) (kk) (kl) (km) (kn) (ko) (kp) (kq) (kr) (ks) (kt) (ku) (kv) (kw) (kx) (ky) (kz) (la) (lb) (lc) (ld) (le) (lf) (lg) (lh) (li) (lj) (lk) (ll) (lm) (ln) (lo) (lp) (lq) (lr) (ls) (lt) (lu) (lv) (lw) (lx) (ly) (lz) (ma) (mb) (mc) (md) (me) (mf) (mg) (mh) (mi) (mj) (mk) (ml) (mm) (mn) (mo) (mp) (mq) (mr) (ms) (mt) (mu) (mv) (mw) (mx) (my) (mz) (na) (nb) (nc) (nd) (ne) (nf) (ng) (nh) (ni) (nj) (nk) (nl) (nm) (nn) (no) (np) (nq) (nr) (ns) (nt) (nu) (nv) (nw) (nx) (ny) (nz) (oa) (ob) (oc) (od) (oe) (of) (og) (oh) (oi) (oj) (ok) (ol) (om) (on) (oo) (op) (oq) (or) (os) (ot) (ou) (ov) (ow) (ox) (oy) (oz) (pa) (pb) (pc) (pd) (pe) (pf) (pg) (ph) (pi) (pj) (pk) (pl) (pm) (pn) (po) (pp) (pq) (pr) (ps) (pt) (pu) (pv) (pw) (px) (py) (pz) (qa) (qb) (qc) (qd) (qe) (qf) (qg) (qh) (qi) (qj) (qk) (ql) (qm) (qn) (qo) (qp) (qq) (qr) (qs) (qt) (qu) (qv) (qw) (qx) (qy) (qz) (ra) (rb) (rc) (rd) (re) (rf) (rg) (rh) (ri) (rj) (rk) (rl) (rm) (rn) (ro) (rp) (rq) (rr) (rs) (rt) (ru) (rv) (rw) (rx) (ry) (rz) (sa) (sb) (sc) (sd) (se) (sf) (sg) (sh) (si) (sj) (sk) (sl) (sm) (sn) (so) (sp) (sq) (sr) (ss) (st) (su) (sv) (sw) (sx) (sy) (sz) (ta) (tb) (tc) (td) (te) (tf) (tg) (th) (ti) (tj) (tk) (tl) (tm) (tn) (to) (tp) (tq) (tr) (ts) (tt) (tu) (tv) (tw) (tx) (ty) (tz) (ua) (ub) (uc) (ud) (ue) (uf) (ug) (uh) (ui) (uj) (uk) (ul) (um) (un) (uo) (up) (uq) (ur) (us) (ut) (uu) (uv) (uw) (ux) (uy) (uz) (va) (vb) (vc) (vd) (ve) (vf) (vg) (vh) (vi) (vj) (vk) (vl) (vm) (vn) (vo) (vp) (vq) (vr) (vs) (vt) (vu) (vv) (vw) (vx) (vy) (vz) (wa) (wb) (wc) (wd) (we) (wf) (wg) (wh) (wi) (wj) (wk) (wl) (wm) (wn) (wo) (wp) (wq) (wr) (ws) (wt) (wu) (wv) (ww) (wx) (wy) (wz) (xa) (xb) (xc) (xd) (xe) (xf) (xg) (xh) (xi) (xj) (xk) (xl) (xm) (xn) (xo) (xp) (xq) (xr) (xs) (xt) (xu) (xv) (xw) (xx) (xy) (xz) (ya) (yb) (yc) (yd) (ye) (yf) (yg) (yh) (yi) (yj) (yk) (yl) (ym) (yn) (yo) (yp) (yq) (yr) (ys) (yt) (yu) (yv) (yw) (yx) (yy) (yz) (za) (zb) (zc) (zd) (ze) (zf) (zg) (zh) (zi) (zj) (zk) (zl) (zm) (zn) (zo) (zp) (zq) (zr) (zs) (zt) (zu) (zv) (zw) (zx) (zy) (zz)

acknowledged at the hearings there will be deemed exceptions and

limestone are limited in the whole of the former Gwent county area ⁷¹.
The Council could not deliver its RTS target without this site.

10.10 However, there are three key challenges to its suitability as a preferred area. These are: (a) its geological significance; (b) its ecological value; and (c) the visual impact of quarrying including when viewed from the Brecon Beacons National Park. I address each of these points below. In assessing the site’s suitability as a preferred area, I have had regard to national policy set out in paragraph 14 of MPPW which identifies these areas as having “known resources with some commercial potential, and where planning permission might reasonably be anticipated”. The test for the suitability of preferred area status does not require the same degree of scrutiny necessary in determining a planning application.

10.11 Mynydd Llangynidr - of which the preferred area forms a part - is

test as national policy. I therefore recommend that this policy be reworded to accord with the foregoing advice in MPPW and I also recommend that the supporting text to this policy refer to MPPW as a source on how this policy would be applied (IC 2 and IC 3).

will only be apparent when studies have been submitted for the purposes of planning application and other consents. A detailed geological appraisal may reveal that planning permission should not be granted. This is a commercial risk the developer would have to undertake. Any future research may also coincide with the next review of the RTS scheduled for 2013/14 which may provide more information as to the significance of this mineral resource in meeting regional needs. On present evidence, I conclude the designation of Trefil as a preferred area for quarrying is sound.

Waste

- 10.19 The Council’s approach to waste management set out in Policies SP13, W1 and DM19 clearly derives from national policy⁷⁵ and regional plans including the South East Wales Regional Waste Plan (SEWRWP)⁷⁶. In summary, the Council seeks a sustainable and integrated approach to waste management that minimises the production of waste and maximises the use of unavoidable waste as a resource.
- 10.20 At the time of the examination, the Council does not yet know how its future waste will be handled and processed as this will be delivered by the private sector depending on the technological option chosen. Policy W1 therefore allocates a very broad area of land for this use which accords with SEWRWP recommendations. Such an approach enables the Council to accommodate a range of potential technological options⁷⁷. The Council has corrected typographical errors with regard to the lower level of land allocation required (that is, a minimum of 1ha rather than 0.4ha⁷⁸). It has also demonstrated sufficient land to accommodate the county borough’s future waste needs regardless of the option that is finally pursued without harming employment land allocations given the oversupply of such land.
- 10.21 Policy DM21 provides appropriate criteria against which any final proposal for waste disposal/ treatment should be assessed. In part, they echo the provisions of Policy DM1 which relate to all development proposals. I nonetheless find the Council’s criteria read well and serve as a specific set of controls appropriate for this type of use. Their retention in this format improves the flow of the Plan.
- 10.22 The Council continues to achieve low rates of recycling, re-use and composting relative to the average in Wales. It accepts the need to pursue initiatives to increase rates to meet ever stricter national targets anticipated over the lifetime of the Plan through a Wise about Waste initiative. The revisions to Policy DM1 in MAC C18 give the

⁷⁵ ~~Indig W80 TodsZeo~~ ~~Was On Wals On Plan'~~

⁷⁶ SD96

⁷⁷ ES8.1 ad SD51 ~~ple a heflaw aenies~~

⁷⁸ MAC M11, M12 ad M21

Council levers to require developers in all types of new developments to take account of the need to build in waste recycling facilities. As such, this change may help the Council improve recycling rates and generally improve the Plan.

11 Transport

11.1 The Plan anticipates significant investment in a range of forms of transport with a clear prioritisation for investment in sustainable forms of transport including cycling, rail and improvements to the bus network. This emphasis on sustainable transport promotion accords with Policy SP6. The projects identified appear largely balanced and reasonable, showing broad alignment with the South East Wales Regional Transport Plan ⁷⁹. Sources of finance from the Welsh Government and EU Convergence funds have been identified. The Council confirmed ⁸⁰ there was a strong likelihood of the majority of these projects being delivered in the lifetime of the plan, a view not contested by the Welsh Government. The highway network can accommodate the increased amount of n

11.5 The speed limit of the A4048 close to

12 Design, Heritage and the Role of the Welsh Language

Design

12.1 The Council is actively seeking to promote transformation of the county borough’s built environment. This has influenced the design of the recently built Ysgol Gymraeg and other buildings including The

concluded there is no need for a specific policy on the role of the



focussed and simpler to measure. The redrafting of some indicators, on renewable energy, for example, reflects changes to Policy DM5. Other indicators such as target employment rates have been altered to enable the Council to compare its performance relative to the Heads of the Valleys area. The revised monitoring indicators also improve the Plan as they now build in a review by the end of 2016, that is, within the four year period of its likely adoption by which stage the Council is obliged to conduct a review of the whole of the Plan in accordance with Regulation 41 of the Local Development Plan (Wales) Regulations 2005.

- 13.6 Two minor but important changes are necessary to monitor development in areas of high risk of flooding (Objective 6) and to promote water quality (Objective 13) to ensure the relevant indicators align more specifically with the justification test in TAN15 the Water Framework Directive⁹⁰ and local water quality issues raised orally during the examination hearings (IC 5) .

⁸⁹,

⁸⁹ W64

⁹⁰ Refer PH2_18 and PH5a for detailed justification

14 Other matters and conclusion

- 14.1 SSSIs are identified on the Constraints Map rather than the Proposals Map. This in itself does not directly conflict with PPW4 or Local Development Plans Wales, 2005⁹¹ which advise that SSSIs should, rather than must, be included on the Proposals Map. Both maps can be easily read together as they follow a similar format and the absence of

Appendix A: The Council’s proposed matters ar

Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through)
MAC S05	45	SP12 (a.)	<p>Blaenau Gwent will contribute to local, regional and national aggregate supplies by:</p> <p>a. Maintaining a minimum 10-year land bank of permitted aggregate reserves in line with national planning policy and addressing the 3Mt apportionment identified in the Regional Technical Statement;</p> <p>b. Safeguarding existing mineral reserves and potential resources from development that would preclude their future extraction ;</p> <p>c. Encouraging the pre-working of mineral resources, where appropriate;</p> <p>d. Ensuring that future mineral working accords with national planning policy in terms of protecting areas of importance of natural and built heritage and limiting the environmental impact of mineral extraction;</p> <p>e. Ensuring that high standards of re-storation and aftercare measures are incorporated at sites;</p> <p>f. Ensuring that impacts upon neighbouring communities and sensitive uses are not adversely impacted by residential areas from mineral and coal operations limited to an acceptable proven safe limit through identification of buffer zones and areas where coal working will not be acceptable; and</p> <p>g. Promoting the efficient use of minerals and use of alternatives to naturally occurring minerals including the re-use of secondary aggregates.</p>
MAC S06	45	Paragraph	In order to address sustainability concerns the Regional Technical Statement (RTS)

⁹³ This site has been owned by C1

Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through) _____
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Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through)
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Shopfront Design;—

f. In the case of the public realm and key locations such as town centres, major routes and junctions, the character and quality of the built form is to a high standard of design and, where appropriate, includes public art; and

~~g. In the case of the public realm and key locations such as town centres, major routes and junctions, the character and quality of the built form is to a high standard of design and, where appropriate, includes public art; and~~

Reference

Reference	Page No. (Deposit Plan as amended by Focussed Changes)	

Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through)
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~~medium sized wind turbine developments, community based and domestic. For the purpose of this Policy, Supplementary Planning Guidance on Renewable Energy will~~



Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through)
			<p>at least 10% affordable housing on all residential proposals that:</p> <ul style="list-style-type: none"> a. Contain 10 or more dwellings; or b. Exceeds 0.28ha in gross site area, or c. Exceed the threshold in (a) or (b) above for adjacent sites.
MAC S19	63	Paragraph 7.61	<p>To ensure the delivery of affordable housing in accordance with the identified need, the Council will seek the provision of at least 10% affordable housing on sites of 10 residential units and over or sites that exceed 0.28 hectares in size (gross site area). The percentage is by definitninitni</p>

Reference	Page No. (Deposit Plan as amended by Focussed
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Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through) _____
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HC1.19	BKF Plastics , Ashvale	1.83	54		
HC1.20	Sirhowy Infants School Site#	—	0.84 f BT [(0.7	re f 276.18	490

Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	Changes (additions are in bold and struck through)				
			H1.10-8	Hafod Dawel Site, Nantyglo# —	0.74	44	
			H1.14-9	West of the Recreation Ground, Nantyglo	0.42	15	
			H1.12-0	Land to the East of Blaina Road, Brynmawr	0.72	25	
			H1.13-1	Land to the North of Winchestown, Nantyglo	0.43	15	
			MU3	<i>NMC Factory and Bus Depot</i>		60	
					Total	248	
			HC1.23	Recticel and Gwalia Former Factory Site, Brynmawr# —	0.96	45	
			HC1.24	Land at Clydach Street, Brynmawr	0.64	12	
			HC1.25	TSA Woodcraft, Noble Square Industrial Estate, Brynmawr	0.71	25	
			HC1.26	Roberto Neckwear, Limestone Road, Nantyglo	0.74	19	
			HC1.27	Cwm Farm, Blaina	9.01	78	

Reference	Page No. (Deposit Plan as amended by Focussed Changes)	Policy / paragraph	
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Reference	
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Appendix B: The Inspector's own binding recommended changes

Appendix C Abbreviations, glossary of terms and examination library
coding references used in this report

A2 Use Class	Financial and professional services
A3 Use Class	Food and drink (restaurants, snack bars and cafés, drinking establishments and take-aways)
AA	Appropriate Assessment
AHVS	Affordable Housing Viability Study
B Use Class	Activity falling within Use Class B1 (business), B2 (general industry) and B8 (storage and distribution)
CCW	Countryside Council for Wales
dph	Dwellings per hectare
DVS	District Valuer Services
ES	Examination Statement Document – statement or other document