

CAERPHILLY COUNTY BOROUGH COUNCIL
LOCAL DEVELOPMENT PLAN
EXAMINATION

Transcript of supplemental statement made by
GAP Architectural and Engineering Design Services

On behalf of

Mr. Stuart Banks (Representor No.50)
& Mr. Morgan Thomas (Representor No 2195)

In reply to the Examiner's Questions to Session One
Plan preparation, Strategy and Policy content

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2. Procedural Matters

Plan Preparation

The Land Usage Plans do not correctly indicate existing established land use which has a direct bearing on future land use and planning policy issues, for example:-

E310

Gelligaer Court was built at the beginning of the last century as the Gelligaer Isolation Hospital opened in 1911 and was extended in 1932. It closed as a hospital in the late 1960's / early 1970's and became the property of the local Authority. In 1977 it was used as a barracks for the "Green Goddess" crews during the Firemans' strike. The site was eventually sold to its current owner and a planning consent to use the site for Class B1 & B8 and was in use as such in until August 2009, Much of the original hospital was demolished and replaced by a steel framed metal clad building with associated concrete yards. It clearly is not an area of special landscape area but an area of employment or a brownfield site.

Islwyn Scout Parc – Site has been used by the Scouts since the 1960's as a campsite for Groups of the Scout Association, both locally and from across the UK and Europe. The local Authorities both current and former are aware of the site as both have provided grant aid and have issued planning Consents. Current Caerphilly CBC designation is Outside Settlement Zone and have not correctly designated the area for tourism. An exemption certificate with regards to camping sites was granted to the Boy Scouts Association, under the Public Health Act 1936 Section 269 and is still enforced today, however this only provides for the use of scout owned property to be used as a Scout Campsite.

Correct designation of existing / proposed land uses will result in the correct policies being applied to future Planning Applications or Planning Enforcement.

Alternative sites.

A large number of alternative sites were proposed. The Council made internal consultations the results of which they made public in a series of "Proposal LDP Candidate Site Assessment summaries" and invited representations from the owners and others in respect of these sites. Subsequent revised plans were produced and published which did not in a number of cases reflect the comments made by the Representors, nor were their comments taken into account.

Example

E243 is a clear example of where the Representor's comments have been mis-represented by the Council when compiling the plans for the Site Allocation Representation Consultation.

The Council appears therefore to have only considered data from within its own organisation or from Central Government organisations when preparing the LDP plans. Some sites were deemed un-suitable unless the existing road fronting were to be widened. On the premise that at Planning Application Stage “each site is considered on its own merit” then surely the requirement to widen the road would simply be incorporated into the design and be conditioned accordingly rather than the site be ruled out of the LDP making any future Planning Application easy to be rejected out of hand as being contrary to the LDP Policy and making an appeal just as impossible to successfully made.

Examples

E79, E82, E310 If considered jointly then a viable development could be obtained. Furthermore if the existing land use class were to be correctly designated then E310 would be classed as a brownfield site and E79 and E82 would therefore become infill between the existing residential boundary and the brownfield site. Thus all three sites could legitimately be developed for housing.

E306, E307, & E308 One site could be acceptable if further ecological reports were obtained and some mitigation works undertaken on adjoining land in the ownership of the applicant.

4. Is the Plan development strategy sound in sustainable terms and founded on robust evidence

Strategy

The Council’s apparent strategy does not allow for indigenous population to expand within individual communities. Many people from the older established individual communities within the valley settings do not migrate from home villages. This has a valuable impacts on social care. If families remain living close together then social needs such as Grandparents providing childcare and children / grand-children providing care for the elderly are easily catered for, hence a reduction in social care costs also in vehicle movements with the resulting reduction in CO2 emissions from cars.

7. Do other strategy and countywide policies within the plan have a distinctive local direction? Do they satisfactorily translate national policy down to the local level? Do they un-necessarily re-iterate national policy requirements?

Section 106 agreements.

Whilst accepting the need for affordable housing, attention should be paid to the overall economies of developing ever more costly sites with increased build costs due to Central Government imposed Sustainable Construction coupled with increased Professional costs in dealing with the Policy Design Documents i.e. Tan 12. Also, the imposition of other S106 charges such as contributions to road infrastructure, sustainable transport, education, POS, and Public Art. All of which increase the development costs whilst the market dictates the land sales value of the development. It is therefore, important that there should be a realistic balance between the costs of S106 and the profitability of sites. To simply state that the provision of affordable housing be based upon numbers can sometimes become a deal breaker for development, particularly on small developments of less than 25 units. Furthermore a balance needs also to be acknowledged and struck to account for the other S106 costs

For example in the case of the former Bedwellty Comprehensive School Site, where the S106 not only required affordable housing but also, a somewhat costly community, sports and education centre. This made developing this site too costly in the current unstable house market.

8. Other Policy Matters.

In respect to non-statutory designated areas such as SLA's PPW states in paragraph 5.3.11 that " Non-statutory designations, such as SLA's should be soundly based on a formal scientific assessment of the nature conservation, landscape, or geological value of the site." The land usage plan and policy CW8 is therefore invalid since adequate care has not been taken to insure that the SLA's are soundly based as they contain developments which have none of the value criteria stated in PPW. E310 for example.