

**FOCUSED ADDITIONAL INFORMATION IN RESPONSE TO INSPECTOR'S ISSUES AND
MATTERS FOR HEARING SESSION 2 – HOUSING PROVISION**

ON BEHALF OF WELLSTRIDE LIMITED

REPRESENTATION NUMBER 2630.D1, D2, D3 AND D4

LAND AT BEDWELLY ROAD, ABERBARGOED

HEARING SESSION 2: HOUSING PROVISION

IS THE MODERATE GROWTH STRATEGY SOUND?

• Is the Plan's adoption of a moderate growth strategy figure of 8,625 units justified?

1. As provided by paragraph 9.2.2 of MIPPS 01/2006, the housing requirement for Caerphilly should be based upon the latest "Welsh Assembly Sub National Household Projections" as these "should form the starting point for assessing housing requirements".

2. The 2006 based Welsh Assembly sub national household projections expects the number of households within Caerphilly to increase from 72,500 in 2006 to 83,800 dwellings in 2021 i.e. 11,300 additional households. This is 2,650 dwellings greater than the figure allowed for in the Deposit LDP.

3. The overall housing requirement for Caerphilly in the Deposit Plan is based upon the SEWSPG process. However this was undertaken prior to the Welsh Assembly 2006 sub national household projections using household growth data with a 2003 base date.

4. The Council identify in their Housing and Population Supplementary Paper SB32 (September 2009) that the Welsh Assembly projections must be treated with caution and that the projections for Caerphilly are erroneous as:

1. Long term population trends suggest a static population in the Council area until the last 5 years.
2. The in migration component from Eastern Europe is too high and that in-migration is now in reverse.
3. There are high levels of natural increase.

5.0 In summary however:

1. Mid year population estimates for Caerphilly show an increase from 1996 onwards and not just the last 5 years.
2. In migration is a feature of the UK which applies to all authorities, Caerphilly is no exception and there is limited evidence to substantiate that Eastern European in-migrants are leaving Caerphilly and the UK.
3. Focusing on natural increase, ignores the fact that household sizes are declining raising the need for additional housing (ie. People living alone, living longer, household split-ups etc) rather than merely population projections alone would otherwise suggest, as demonstrated by Table 4 of Welsh Assembly 2006 based household projections.

6. Whilst the WAG projections are not prescriptive, they are the most upto date projections available, and were rigorously assessed prior to being issued by the Assembly. Accordingly it would be erroneous to utilise the SEWSPG data or other housing growth requirements which utilise older data or variant assumptions.

• Is there a robust rationale for this figure in the light of (i) recent population trends, (ii) the SEWSPG housing apportionment exercise; (iii) the WAG 2006- based household projections?

7. This issue is covered in the proceeding paragraphs.

• Have the interrelationships between the Plan's moderate growth strategy and the emerging strategies of neighbouring authorities been taken into account?

8. Within this context it is noted that Cardiff County Council propose to follow the housing projections published by the Welsh Assembly and have not relied upon the SEWSPG data. Rhondda Cynon Taff provide a greater level of housing (1,150 extra dwellings) compared to the WAG projections for an additional 13,700 dwellings over the period 2006-2021. Merthyr Tydfil propose to increase their household provision to greater levels than the Welsh Assembly projections by an extra 1,400 dwellings compared to the WAG projections for 2,400 extra households. However the extra household growth proposed within Merthyr Tydfil, far exceeds past delivery rates and objectors to this plan consider them to be undeliverable.

9. In contrast, Caerphilly propose to underprovided by 2,650 dwellings. This seems unacceptable given that the 2008 JHLAS identifies a housing land supply, based on past build rates, of only 3 years. Through the SEWSPG process and this resulting under-provision, Caerphilly's housing needs are being transferred to adjacent authorities, particularly Merthyr Tydfil, where there is little prospect of this extra provision being delivered. Additionally the genuine housing needs of Caerphilly, which can be delivered, would be unmet – with significant adverse economic, social and sustainability consequences. Accordingly, Caerphilly's, housing requirement should be based on the Welsh Assembly Household projections as this will ensure the needs of the County are met within the County and that housing requirements are not merely passed onto adjoining authorities.

IS THE OVERALL LEVEL OF PROVISION FOR NEW HOUSING OVER THE PLAN PERIOD ACCEPTABLE?

• Does the Plan provide a satisfactory total amount of land for housing development?

10. The starting point for this point is the overall housing requirement identified in the plan compared to the Welsh Assembly projections and the resulting residual requirement which defines the overall need for new housing in the Plan period

	Caerphilly	Welsh Assembly Based
Overall housing requirement 2006-2021	8652	11300
Completions 2006-2009 (April)	1888	1888
Under Construction	283	283
Demolitions	-53	-53
Residual Requirement 2009-2021	6534	9182

11. It is clear that through the use of the Welsh Assembly projections there is a significantly greater need for additional housing land in the County than is provided for within the Plan.

12. Turning to the actual identified total amount of land for housing development, the Plan does not clearly set this out.

13. Examination Paper ED19 purports to provide an updated position, but fails to provide a full site by site breakdown and provides only a general summary table of the housing provision within the authority. (Table 4). It is clear however that over 40% of the Council's residual requirement to 2021 is assumed to be provided upon unidentified sites – this by its very nature is not specific housing land and as identified later, the deliverability of this element is highly questionable.

Windfalls	1200
Small Sites	1100
Empty Properties	300
Conversions	142
<i>Total unidentified sites forming part of alleged supply</i>	<i>2742</i>
Allocations and Permissions	5792

14. We consider that there is a general lack of transparency and robustness to the total amount of land identified for housing in the Plan. This calls into question the soundness of the Plan.

15. Consequently there is a general need to identify specific, deliverable, available and suitable specific sites for housing in order to meet the housing needs of the County to 2021.

• Are there sufficient margins in the Council's calculations to provide confidence that planned growth can be accommodated?

16. We contend that there is insufficient margin to provide confidence that the required housing needs can be met within the County, due to the reliance upon a significant proportion of unidentified housing sites i.e.: windfalls, small sites, conversions and reuse of empty properties. Additionally the LDP incorporates: planning applications which are waiting the signing of S106 agreements; applications pending determination; as well as planning permissions which have or are close to expiry. Many of the sites within these categories have been in the planning system for considerable periods of time, and if they were not developed during the peak of the economic cycle, their deliverability/availability within the present economic context must be highly questionable. We consider the plan is potentially unsound for these reasons and that it necessitates the identification of additional specific deliverable and available sites for housing development.

• Have the sites been subjected to a robust assessment of availability/deliverability?

17. Setting aside the issue regarding the reliance upon unidentified sites within the Plan to meet the housing need, as outlined above, there is also a range of sites which are potentially subject to significant issues regarding deliverability and their suitability for housing development.

18. There are a significant number of sites which have planning permissions which are nearing or have expired or are pending S106 agreements, many of these are historic over 3-4 years or more old (LA46 – Update of Planning Consents – December 2009). The Local Development Plan Manual allows for major sites with planning permission to be shown on the Proposals Map but not sites pending the signing of S106 agreements. Sites which have not been developed despite extant consents should be reviewed, whilst expired sites should be removed. We estimate that these sites total 1,479 dwellings. These sites are identified at **Appendix 1**. Overall given the status of these sites and the lack of development during the peak of the economic cycle, there must be significant issues regarding their availability, viability and deliverability for housing.

19. Additionally a number of sites are located within or partly within areas identified by the Environment Agency as being within flood risk zone C including for example:

- HG1.50 - Land West of A467 and Afon Ebbw for 270 dwellings.
- HG 1.16 - Waterloo Works for 545 dwellings.
- HG1.68 - St Illan School for 200 dwellings.
- HG1.XX – Aberbargoed Hospital.

There are also a range of other sites such as Aberbargoed Plateau which has been removed and reinserted into the plan, which questions the site's deliverability/suitability for housing, along with

20. A range of other sites are included for housing development, but in order to achieve this, there is a need to relocate institutional uses such as schools, hospitals, libraries and ambulance stations. Limited information is presented on the availability and deliverability of such sites, particularly in relation to the funding, status and timetable of the relocation of the particular institutional use.

21. There are also a significant number of sites proposed to be allocated which are largely previously developed but which are affected by potentially significant and costly constraints to development. **(Appendix 1)** Given this situation and the economic climate and the tightening of public sector funding for such developments there are potential deliverability issues associated with some of these more costly sites. Limited if, any information, is presented on the viability of delivering some of the larger or more costly previously developed sites which are identified in the plan. Accordingly there appears to have been insufficiently robust assessment of the deliverability and availability of sites on which questions the soundness of the Plan.

• **Is the Plan's estimate of windfall sites coming forward realistic?**

22. This is a significant issue, as 40% of the residual housing requirement to 2021 is proposed to be met through unidentified sources including windfall sites. The windfall allowance in the LDP extrapolates the past 5 year windfalls from 2004/5 to 2008/9 totalling 533 dwellings, deriving an annual average and multiplying this for the 15 year plan period, a total of 1,599. (SB34 Population and Housing September 2009). The figure is adjusted to take account of completions in 2006-2009 to a 1200 dwellings. We consider this figure to be unrealistic as:

1. Past windfall rates can not be guaranteed to be replicated in future years of the plan.
2. There is a major spike in the figures for the 2006/2007 period that does not reflect the 5 year trend, skewing the average.
3. The sampling period coincides with the upward peak of the economic cycle. Planning permissions granted in 2008/2009 whilst coinciding with the economic downturn, were probably prepared during the upward peak and were overtaken by economic events.

4. The 5 year period from 2002-2006 resulted in a far lower 15 year windfall figure of 807 dwellings as per submitted document BP6.
5. The economic situation is such that redevelopment to residential purposes may no longer be viable on future windfall sites.
6. Whilst an adjustment has been made for completions to obtain the windfall allowance this is performed at the end of the calculation, the average is still skewed by the 2006/2007 peak.
7. Windfall sites a finite resource. Significant development has already occurred on previously developed land. Over the plan period it is expected that over 63% of the housing land supply will be delivered upon previously developed land. Thus where will the windfall sites arise from ?. No assessment has been undertaken to identify potential windfall sites.
8. It has significant unintended and unplanned consequences through increased tension and conflicts with other policies of the Plan regarding: competing land uses, densification of the urban environment, loss of limited green spaces and open spaces in the urban environment and loss of protected employment land and other land to residential uses.

23. The evidence submitted to support the contribution of windfall sites is questionable. This situation questions the soundness of the plan to deliver the necessary houses to meet the social, economic and housing needs of the County.

• Is the estimate of small site contributions too high?

24. As per the comments regarding windfalls, a similar situation applies to the small sites allowance with a total of 1,100 dwellings indicated from these unidentified sources over the plan period. As per the windfall allowance, this figure is: derived from a 5 year average; taken at the peak of the housing cycle; ignores that these are a finite resource and an element of double counting. Additionally the LDP allocates many sites of 10-15 dwellings. Whilst these are not technically small sites, they could potentially become small sites because at the detailed design stage they could yield less than 10 dwellings due assumptions made in the Plan regarding density, constraints or the type of development. The small site contribution is therefore considered to be too high and unsound.

Is it reasonable to include an allowance for empty properties brought back into use as part of the housing supply figure?

25. The allowance for empty homes being brought back into use is 300 dwellings over the plan period, based upon 2 years of data which reveal that 20 properties in both 2006/7 and 2007/8 were brought back into use as per ED34. A two year sample period is clearly insufficient to be a robust and sound evidence base. We are also unable to ascertain if the Council has an Empty Homes Strategy which considers the scale, measures to address and identifies adequate resources to tackle the empty homes issues and deliver 300 dwellings over the plan period.

- **Are there robust monitoring and review mechanisms that will enable the Plan to respond to changing future circumstances?**

26. This is a significant issue as the plan relies heavily upon the delivery of 2,742 dwellings on unidentified sites through windfalls, small sites, conversions and reuse of empty properties accounting for over 40% of the Council's identified residual housing need to 2021.

27. Similarly as noted above, there are significant issues regarding identified sites considered as part of the Plan but which are either subject to potential constraints on their delivery or have been subject to the signing of S106 agreements for considerable periods of time.

28. If these sites do not come forward and prove as we suspect to be a significant over estimation then there is no provision in the plan to bring forward specific alternative sites to rectify the likely resulting deficiency in housing land supply. The only recourse for monitoring is through the TAN1 monitoring process and likely appeals for sites outside of the development plan system.

Is the spatial distribution of new housing opportunities across the County Borough acceptable?

- **Is the planned balance of HOVRA/NCC/SCC provision satisfactory?**

29. In broad terms the balance between housing provided in the separate strategy areas appears acceptable. However as identified above, a significant proportion of the sites have potential deliverability/availability issues. Given this situation, whilst the overall balance appears acceptable, the likelihood of this being achieved is questionable. This is particularly the case for the SCC area where 97% of the housing sites are upon previously developed land. We consider that there is likely to be a need to refocus development to suitable, available and deliverable Greenfield sites in order to ensure the delivery of the overall housing required for the County Council to 2021.

- **Is the overall distribution of sites in relation to settlement characteristics, size and function justified?**

30. As an example and just focusing upon Bargoed, this is a Principle Town and therefore should receive a significant proportion of housing, employment, and retail growth etc to reflect its status. It is however notable that a significant proportion of housing is directed to lower order settlements such as Rhymney, Tredegar, Pontlloftyn and Princetown and this is replicated throughout the rest of the County. The greater Bargoed area receives only 13% of the residual housing need of the county to 2021. MIPPS 01/06 identifies the need for a clear settlement strategy to be identified and

pursued in the LDPs. Given the above, we believe that the LDP's distribution of housing relative to identified settlement strategy is potentially contrary to the approach advocated by the Welsh Assembly Government and the settlement strategy of the LDP.

• Is the allocation of housing sites based on a robust and comprehensive sites assessment methodology?

31. As identified above we do not consider that the housing sites are based on a robust and comprehensive assessment process. Additionally the Council are also relying upon the delivery of a significant proportion of "unidentified sites" to meet the housing needs of the County to 2021.

• Is the balance of reliance on brownfield land versus Greenfield sites acceptable?

32. We understand the strategy of seeking to focus development onto previously developed land stems from guidance within PPW which advises that there is a preference for the development of brownfield sites for housing and other purposes before the release of greenfield land. However this preference must take account of the wider needs identified in PPW for the delivery of adequate numbers of homes at a range and choice of sites to meet the needs of community (PPW paras 9.11, and 2.3.2).

33. As identified in respect to the above, there are a significant number of previously developed sites relied upon by the Council which have significant deliverability/availability questions. Given this situation we believe there is a need to address this situation by identifying additional deliverable and suitable greenfield sites for housing.

34. It is also important to recognise that the development of greenfield and previously developed land are two separate but complementary streams of supply. This is particularly the case because not all sites will come forward at the same time, particularly previously developed sites which often have longer lead in times associated with their development than Greenfield sites. There is also a need for a wider portfolio approach offering a range of Greenfield sites particularly at the Principle Towns, where such opportunities are presently lacking within the Plan. Whilst development on previously developed land regenerates such sites, appropriately located greenfield sites contribute to wider regeneration efforts by delivering early within the plan period, resulting in: additional households to support economic growth; a greater range and choice of housing; and additional consumer expenditure to support retail, leisure and community facilities within Principle Towns.

35. Again drawing upon the Bargoed area, whilst the Greater Bargoed area has 6 sites for housing, all except one site is upon previously developed land. Additionally the largest allocated site at Aberbargoed Plateau (430 dwellings) was removed and then reinstated into the Plan at the Focused

Changes and Further Focused Changes stages, accordingly there appears to be questions within the Council over its suitability for housing.

36. Given the above we believe there is a greater need for a more balanced approach to the delivery of housing on both brownfield and Greenfield sites particularly within the Bargoed area.

• Is the extent of reliance on brownfield sites for provision of housing land in the SCC (97%) appropriate and realistic? Will this result in an insufficient range and choice of housing?

37. The strategy in the SCC is almost entirely based on previously developed land. This however needs to be robustly tested if the Plan is to be considered to be sound. As previously identified there are a significant number of sites included in the allocations which have deliverability/availability issues. The Inspector needs to be fully satisfied that the sites the Council have identified will be available and deliverable. We also believe that the extent of the reliance upon unidentified windfall sites is also in-appropriate and unrealistic.

• Should the Plan allocate more brownfield sites for housing in the NCC?

38. Yes, but only if these are available, deliverable and suitable particularly given the issues relating to the proposed sites in the LDP and the reliance upon unidentified sites and if the most sustainable option.

• Is the proportion of housing land using brownfield sites (67%) too high? Will this result in an insufficient range and choice of housing?

39. This matter is addressed above.

Appendix 1

Schedule of Sites with Deliverability/Availability Questions

Update of Planning Consents – December 2009

LDP Ref	Site name	Settlement	Size (Ha)	Units after Council 1.12.09 (2007 base)	Planning Permission On 01.04.07	Planning app to be determined 01.04.07	Planning permission on 01.04.09	Planning Status December 2009	Planning Application	BARTON WILLMORE COMMENTS RE PLANNING STATUS
HG 1.01	Land to the South of Merthyr Road	Princetown	4.02	140				Two plots have consent (1 complete, 1 under construction as of 01.04.09) but no planning consent on remainder of site and no applications awaiting determination		
HG 1.04	Lower Hill Street	Rhymney	0.30	10		x	x	Outline consent valid until September 2010	07/0912/OUT	No progress to date – will consent be implemented before expiry.
HG 1.06	Maerdy Crossing	Rhymney	2.40	57		X	X	Deferred for the completion of a Section 106 Agreement	07/1011/OUT	Awaiting signing of S106 agreement for 3 years. Why has this not been signed?
HG 1.10	Land South of West Carn Y Tyla Terrace	Abertysswg	7.08	133	X		X	Outline consent valid until September 2011	06/0782/out	No progress to date – will consent be implemented before expiry.
HG 1.13	Land at Graig Rhymney	New Tredegar	2.61	30	X		X	Outline consent expired December 2009	P/05/1144	This consent has expired. If it was not developed at peak of the market will it be developed now?
HG 1.28	Blackwood Ambulance Station	Blackwood	0.68	24				No Consent and no applications awaiting determination		Is site genuinely available?
HG 1.29	Pencoed Avenue	Cefn Forest	1.87	65	X		X	Deferred for the completion of a Section 106 Agreement on part of site	P/06/0563AN D07/1393/NN CC	
HG1.31	Land South of Thorncombe Road	Blackwood	0.34	12	X		X	Deferred for the completion of a Section 106 Agreement	06/0821/OUT	Awaiting signing of Section 106 for 4 years. Will this be signed?
HG 1.32	Land at Hawtin Park	Pontllanfraith	5.55	194				Outline application awaiting determination	08/0752/OUT	An application nearly two years old. What is delaying its determination?
HG 1.36	Penallta Yard	Ystrad Mynach	0.29	10	X		X	Outline Consent valid until July 2010	07/0750/OUT	This consent has nearly expired. Has it been reviewed?
HG 1.37	Land at New Road	Ystrad Mynach	0.54	18		X	X	Deferred for the completion of a Section 106 Agreement	07/1477/OUT	Awaiting signing of S106 for 3 years. Will it be signed?
HG 1.41	Land to the east of Handball Court	Nelson	3.36	90		X	X	Deferred for the completion of a Section 106 Agreement	07/0366/full	Awaiting signing of S106 for 3 years. Will it be signed?
HG 1.45	Land West of Old Pant Road	Pantside	2.20	56		X	X	Deferred for the completion of a Section 106 Agreement	08/0207/full	Awaiting signing of S106 for 2 years. Will it be signed?
HG 1.51	Twyncarn House	Cwmcarn	0.39	26			X	Consent valid until September 2010	07/0453/RM	This consent is nearly expired will it be implemented?
HG 1.55	Land at Station Approach	Risca	0.51	10	X			Previous planning consent expired	P/05/0262	This consent has expired.
HG 1.58	Eastern part of land adjacent to River Ebbw	Pontymister	1.38	48				Application for this site along with land on opposite side of river deferred for the completion of a Section 106 agreement. However, Tesco now approved on opposite	06/0472/OUT	An old application. Has this been approved? Also Tesco Stores have an application which appears to question if site will be developed for housing.

								side of river so unknown if previous application will proceed.		
HG 1.60	Tyn Y Waun Farm	Machen	0.77	10	X			Consent for part of site valid until February 2010	P/05/0367	Has this now expired or will site be developed out?
HG 1.62	Former petrol Filling Station, Newport Road	Trethomas	0.19	10	X		X	Housing consent expires March 2010. planning application for Tesco Express store on the site granted in August 2009	P/04/0522	Tesco Store likely to replace housing consent.
HG1.63	The Grove	Trethomas	0.46	13	X		X	Housing consent expires January 2011	P/04/1212	An old permission. If not built now not likely to be 2011.
HG 1.66	Land at Venosa Trading Estate	Caerphilly	4.55	130		X	X	Deferred for the completion of a Section 106 Agreement	07/0447/FUL L	What is delaying signing of S106 agreement? Will it be signed?
HG 1.67	Land at Pontypandy industrial Estate	Caerphilly	7.58	199	X		X	Deferred for the completion of a Section 106 Agreement	P/04/1325	A 6 year old scheme. What is delaying signing of S106 agreement? Will it be signed?
HG 1.69	Cardiff Road/Pentre bane Street	Caerphilly	1.12	127	X		X	Consent valid until August 2012	06/0665/FUL L	This is the town centre regeneration scheme with apartments. Will these be built in present market?
HG 1.71	Gas Works Site, Mill Road	Caerphilly	2.20	55	X		X	Deferred for the completion of a Section 106 Agreement	P/03/0926	This is an old application. Will S106 ever be signed?
HG 1.78	Land below Coronation Terrace	Senghenydd	0.76	12	X			Outline consent expired August 2010	06/0172/OUT	This consent is nearly expired.
				1479						

OTHER SITES PROPOSED ALLOCATIONS AND PERMISSIONS

SITE			Description	Planning History	COMMENTS RE: CONSTRAINTS
HG 1.50 s Land west of the A467 and Afon Ebbw, Abercarn Brownfield	8.7 Ha	269	This site comprises the former South Celynen Colliery, which been reclaimed for development.		Zone C Flood risk FCA needed. SINC protection needed.
HG 1.56 Rom River, Risca 1 Brownfield	1.9 Ha	38	This is a small brownfield site to the north of Risca-Pontymister town centre, which is currently occupied as by the town library and an adult education centre.		Relocation programme for the library and education centre?
HG 1.61 Waterloo Works, Waterloo Brownfield	17 Ha	545	This is a large brownfield site, formerly used as a paint works.	An outline planning application has been submitted to redevelop the site for 545 residential units and a primary school. This application has been deferred for the signing of a Section 106 agreement.	Majority of site in Flood Zone C
HG 1.63 The Grove, Trethomas Brownfield <i>(SEE PLANNING PERMISSION LIST ABOVE)</i>	0.46 Ha	13	This is a flat brownfield site in the heart of Trethomas. The site comprises a large number of mature trees and every effort should be made to retain these as an integral part of the development. The site has the potential to accommodate approximately 10 high quality residential units.	full permission for residential development in 2005.	Capped mine shafts, will require technical advice to be sought. Mature trees on site limit number of dwellings.
HG 1.64 Bedwas Colliery, Bedwas Brownfield	36.22 Ha	630	This site comprises a larger former colliery site to the north of the settlements of Bedwas and Trethomas and several fields to the east. The site is proposed for mix of uses including housing, formal leisure (allocated under LE 4.11) and a new school (allocated under CF 1.34).		1 High voltage overhead transmission lines cross the site from west to east along the northern boundary of the site and a 60-metre buffer between these lines and any built development will need to be provided. 2 Prior to any development it will be necessary for the colliery, including the tip north of the site, to be satisfactorily remediated, including improvements to the drainage of the site. 3 Parts of the public sewerage network suffer from hydraulic overloading. No Regulatory improvements are planned under Dwr Cymru Welsh Water's current 5 year Capital Investment Programme. Should this site be developed in advance of any regulatory improvements, developers may be required to fund the essential improvements. 5 The site is also crossed by public sewers, which may restrict the density of the development proposed. 6 Access to the site is to be obtained from a new access road (allocated under TR 7.3) linking the eastern part of the site with Newport Road. 7 Development Brief will need to be produced to show how constraints will be overcome. Given constraints and costs is development viable?
HG 1.65 St James Primary School, Caerphilly Brownfield	2.98 Ha	49	A large flat site proposed for a mixed-use development involving a replacement primary school and housing.		School still on the site and will need to be relocated Public Sewers cross the site, which might impact on density and layout Development brief will need to be produced to show how constraints will be overcome
HG 1.67 Land at Pontypandy, Caerphilly Brownfield <i>(SEE PLANNING PERMISSION LIST ABOVE)</i>	7.58 Ha	199	The site is an irregularly shaped area of land comprising a large detached dwelling and curtilage known as Mackworth Grange, and a substantial area of overgrown land.	Outline submitted awaiting sec 106	Wet land. Peat on the site indicating poor drainage. Translocation and peat removal will need to be undertaken. New access required

HG 1.68 St Ilan School, Caerphilly Brownfield	12.67	200	This site comprises the former St Ilan's Comprehensive school and adjoining playing fields, in addition to the current site of YGC Caerffili off Parc Y Felin Street south of the existing St Ilan's school buildings.		<p>1 The site is allocated for a mixed-use development incorporating housing, leisure and education facilities. As part of this proposal, YGC Caerffili and Plasyfelin Primary School will be relocated to the listed school buildings at the former St Ilan's Comprehensive (allocated under CF 1.28) allowing the residual land to be allocated for leisure (allocated under LE 4.13) and housing use.</p> <p>2 The Nant Yr Aber, which flows through the centre of the site, is designated a river SINC under NH 3.156 and consideration should be given to its protection in the design of any scheme.</p> <p>3 The site is in Zone C – a FCA is needed.</p> <p>4 Public Sewer crosses the site which might restrict density and affect layout</p>
HG 1.74 Hendre Infants School, Caerphilly Brownfield	0.46 Ha	16	The site of a current school building, bordered to the east by the Caerphilly northern bypass, to the west by St Cenydd Road and north of St Cenydd roundabout.		Programme for relocation and funding secured?
HG 1.75 Cwm Ifor Primary School, Caerphilly Brownfield	2.8 Ha	46	An irregular shaped parcel of land, proposed for a mixed-use development involving a replacement primary school (allocated under CF 1.25) and housing.		Existing school needs and playgrounds need relocating
HG 1.78 Land West of Coronation Terrace, Senghenydd Greenfield	0.76 Ha	12	This site is a 0.76 hectare site roughly rectangular in shape located on a steeply sloping area of land to the north-west of Coronation Terrace, Senghenydd.	Outline in 2006.	Severe gradients mean part of the site cannot be developed
		1805			