

## APPENDIX 2 - THE BEDWAS COLLIERY SITE, CAERPHILLY – RESULT OF SELF ASSESSMENT

The following table assesses the site being objected to (Site Ref D04). This takes into account the relevant Site Assessment Methodology adopted by Caerphilly CBC by appraising the site against established Sustainability Appraisal/ Strategic Environmental Assessment SA/SEA objectives. The Council's Assessment, in terms of short, medium and long term effects is compared with the Objector's Assessment.

Assessment Test	Council's Assessment of Effects	Objector's Assessment of Effects	Analysis (Where generally agreed the Council's analysis is reproduced. The Objectors' comments are highlighted in red)
1. Will it reduce the need to travel?	0	0	<p>Very few sites could actually reduce the need to travel but the site is close to amenities and public transport.</p> <p>The Council's assessment in this respect is agreed.</p>
2. Will it encourage walking as the mode of travel to local amenities due to the proximity of development to existing facilities?	0	0	<p>The site could potentially encourage walking as the mode of travel as it is close to amenities and bus and rail facilities.</p> <p>The Council's assessment in this respect is agreed. However, it is disputed that the site is close to rail facilities.</p>
9. Will it remove derelict land?			<p>The site, rather than constituting derelict land, is increasingly being re-generated with vegetation and is widely used for informal</p>

	+	X	amenity purposes. (the Council also acknowledge that a large part is green-field). It is likely that large volumes of contaminated soils will be disturbed and will have to be removed for landfill. Furthermore the extent of the site is such that residual pockets may remain. Consequently, contrary to the Council's Assessment, effects will be negative
<b>14. Does it help reduce disparities between Southern and Northern wards?</b>	0	0	<p>The site doesn't help to reduce disparities between the north and south.</p> <p>The Council's assessment in this respect is agreed.</p>
<b>18. Will it support the role and function of the settlement within which it is located?</b>	+	X	Although there would be short term benefits to local traders due to the increased catchment population, in overall terms a negative impact would result due to the scale of the development, as a major urban extension on the edge of three distinct communities, and its effects on the local community, including increased traffic generation and congestion.
<b>34. Is it likely to improve air quality within a designated air quality management area?</b>	0	X	The Council's assessment in this respect is not agreed. The development will generate significant amounts rather than 'some' traffic, which will use routes affecting air quality management areas. Furthermore, there will be dust and pollution impacts as a result of reclamation works which will have air quality

			implications.
<b>41. Is it likely to adversely affect an area of landscape importance?</b>	<b>X</b>	<b>X</b>	<p>The site is adjacent to a special landscape area. There will be some improvement to the SLA by virtue of restoring the former tip.</p> <p>The Council's assessment in this respect is generally agreed. However, the tip as it stands is an important landscape feature in its own right which provides a reminder of the area's industrial legacy.</p>
<b>42. Is it likely to adversely affect a building, structure or area of heritage importance?</b>	<b>0</b>	<b>0</b>	<p>The site was a late colliery and a possible area of early settlement although there is no certainty as to its archaeological merit.</p> <p>The Council's assessment in this respect is agreed.</p>
<b>49. Is it located outside of an area at risk of flooding?</b>	<b>+</b>	<b>0</b>	<p>Despite the site not being located in an area of flood risk, there would still be local drainage issues to be addressed by additional run-off etc. Rather than a positive score in this respect, neutral would be more appropriate.</p>
<b>51. Does it reduce the risk of flooding to people and property?</b>	<b>0</b>	<b>0</b>	<p>Not relevant as the site is not located in an area of flood risk.</p> <p>The Council's assessment in this respect is</p>

			generally agreed as per the above comment.
<b>53. Will it impact locally on a recognised site of geological importance?</b>	+	0	As there is no likely relevance, a neutral score would be more appropriate rather than a positive one.
<b>54. Will it potentially reduce the amount of derelict, contaminated, degraded or underused land?</b>	++	X	National Planning Policy recognises that not all brownfield sites, especially where there are high levels of ground contamination, are suitable for reclamation for sensitive after uses. In the absence of any credible information which would demonstrate that the disturbance, removal, and disposal of large amounts of contaminants would not have adverse effects, any positive scoring is inappropriate.
<b>59. Does it protect areas of importance for biodiversity?</b>	X	X	The access road into the site is through a SINC.  The Council's assessment in this respect is agreed. It will also seek to erode a previously designated green wedge area.
<b>61. Does it protect woodlands, hedgerows, trees and watercourses?</b>	X	X	Development brief required as there is woodland on eastern side of site, a site development brief is required to protect and improve as far as possible to reduce the impact of the development.  The Council's assessment in this respect is generally agreed. However, detailed mitigation proposals would be required rather than just a

			development brief.
<b>63. Does it guard against habitat fragmentation?</b>	<b>x</b>	<b>x</b>	<p>The access road into the site will result in fragmentation but a site development brief should be used to reduce the impact.</p> <p>The Council's assessment in this respect is generally agreed subject to the above comment.</p>
<b>65. Will it promote reduced journey lengths by private vehicles?</b>	<b>0</b>	<b>0</b>	<p>The site is located close to facilities. A design brief could improve the interconnectivity of the site with facilities nearby.</p> <p>A smaller housing development for local needs could reduce the need to travel as some interconnectivity exists with local facilities and employment opportunities to the south and west of Bedwas. However, given the proposed scale of the development it is likely that a high proportion of future residents will be reliant on private vehicles and will commute to employment and shopping destinations elsewhere.</p>
<b>68. Does it promote the use of alternative travel other than the car?</b>	<b>+</b>	<b>0</b>	<p>The proximity to a bus stop and cyclepath, whilst sustainable features in relation to a smaller development, could justify a positive score. However, a development of 630 units would result in a higher proportion of out-commuting.</p>

<b>69. Will it deliver services and facilities in locations accessible by modes other than the car?</b>	+	0	It is not a location with immediate access to the passenger rail network and the Council's assessment probably assumes that there will be public transport penetration to the site. Nevertheless the location alone will not encourage the use of alternative travel.

### Comment

The Council, under this heading, commented to the effect that “*Contamination must be carried off site to allow development – this is site specific. Some site specifics are not coming forward strongly enough.*” There is a therefore an acknowledgement that Assessment Tests 9 and 54 have not allowed for this effect.

### Issues/Factors For Detailed Design or SPG

The continued reference to the need for issues to be dealt with by a design brief indicates that the assessment has been based on insufficient evidence, and as a result optimistic assumptions have been made.

### Key LDP Implications

Whereas the Council's Assessment awards the proposals 7 pluses, 7 neutral scores and 4 negative scores, the Assessment carried out on behalf of the objectors, shows 8 negative scores, 10 neutral scores and no pluses. 4 negative scores are agreed with the Council, as are 6 neutral classifications.