

**Caerphilly County Borough
Local Development Plan
Examination**

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Ms Rhian Kyte
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My Reference: ED.5

Date: 19 November 2009

Dear Ms Kyte

EXAMINATION OF CAERPHILLY COUNTY BOROUGH LOCAL DEVELOPMENT PLAN UP TO 2021 (LDP) - EXPLORATORY MEETING

Following his initial appraisal of the submitted LDP and accompanying evidence base, the Inspector has identified certain key concerns about the Plan which he considers raise significant issues which may affect its soundness. He considers that the appropriate action in relation to these concerns is to hold an Exploratory Meeting with the Council, to which representatives of the Welsh Assembly Government will also be invited, so that these concerns can be explained and their implications for the conduct of the Examination of the Plan considered.

In summary, the matters which the Inspector wishes to raise at the Exploratory meeting are:

- The implications of proposed changes to the Plan. The Inspector is concerned that a number of the Focussed Changes to the Deposit Plan put forward by the Council are not accompanied by an evidence-based planning rationale which supports the change in terms of achieving a sound Plan. The Focussed Changes to which this relates are FC04, FC07, FC08, FC09, FC10, FC11, FC12, FC13, FC15 and FC16. Moreover, a number of these changes concern allocations in the Deposit Plan which play a significant role in delivering key regeneration, sustainably-located housing and affordable housing elements of the Plan strategy (FC04 HG1.19 Aberbargoed plateau; FC09 HG1.32 Land at Hawtin Park, Pontllanfraith; FC15 HG1.68/CF1.28/LE4.13 St Ilans Comprehensive, Caerphilly; FC16 HG1.72 Caerphilly Miners Hospital, Caerphilly) and/or concern proposals which appear unsupportable in SEA/SA terms or which may not be realistically deliverable (FC04 HG1.19 Aberbargoed plateau; FC11 TR99.2 Nelson north-south Bypass; FC10 TR99.1 Llancaiach View, Nelson). In relation to this issue the Inspector notes that another significant housing site in the Deposit Plan (HG1.25 Navigation Colliery, Crumlin) is also the subject of a post-Deposit Change put forward by the Council. This change also is not accompanied by a sufficiently rigorous assessment of its implications for the Plan, and raises similar questions in terms of delivering the housing elements of the Plan strategy.
- The target for delivery of affordable housing by the Plan and how the Plan seeks to achieve this. The Inspector notes the changes put forward in Focussed Changes FC01 and FC02 to policies SP17 and CW 14 and their respective explanatory paragraphs. However, he has concerns about the clarity with which the Plan expresses the target number of affordable dwellings that the Plan seeks to deliver through the planning

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system; the extent of justification for the level of affordable housing provision proposed as the target which the Plan should seek to deliver through planning obligations on new housing sites, in the light of the level of affordable need identified in the 2008 LHMA; and the existence of a robust evidence base which demonstrates that the stated target of affordable housing provision by planning obligations can realistically be delivered in any event. In relation to this last matter, the Inspector would draw attention to the extent of apparent reliance for delivery of affordable dwellings to meet the Plan target on a single major housing site (Bedwas Colliery) which has significant development complications and which is not anticipated to come forward at best until the final part of the Plan period; and to the additional implications for delivery of affordable housing arising from FC09, FC15, FC16 and the proposed deletion of allocation HG1.25.

- The extent to which the submitted evidence base satisfactorily addresses the implications of questions concerning site availability and cross-border local authority co-operation for the delivery of Plan proposal WM1.1: Cwmbargoed Washery - possible site for waste management facility serving more than one local authority area.

The Exploratory Meeting will be an opportunity for these matters to be jointly considered in terms of the extent and nature of the evidence base the Council has submitted to the Examination on these matters; the options open to the Council should it wish to give further consideration to some of the changes it has put forward; the procedural position should aspects of the Plan remain in place which lead the Inspector to conclude that the Plan is unsound; and what additional material is needed to properly inform the Examination in respect of the matters raised, together with the timetable to provide that material. However, the discussion will not involve the hearing, examination or testing of the evidence itself, which will occur at the Hearing Sessions in due course. Following the Exploratory Meeting the Inspector will determine how to progress the Examination.

Exploratory Meetings should normally be held in advance of the Pre-Hearing Meeting, which in this case has already been arranged for 8 December 2009. In view of the limited time available, the Inspector has decided to hold the Exploratory Meeting commencing at 10.00 on 8 December in the Council Chamber at Ty Penallta. The Exploratory Meeting will finish at 12.00 and will be followed by the Pre-Hearing Meeting, which will now commence at 13.00 and deal with the timing and format of the Hearing Sessions so far as possible.

In the light of the limited time available, the Council should undertake the required steps to publicise the Exploratory Meeting as quickly as possible.

A copy of this letter has been sent to Mr Mark Newey of the Welsh Assembly Government Planning Division, so that he and his colleagues may participate in the exploratory meeting as appropriate.

Yours sincerely

Barbara Prosser

Programme Officer

cc Mr. Mark Newey
Wales Assembly Government

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