

**Caerphilly County Borough  
Local Development Plan  
Examination**

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Ms Rhian Kyte  
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NP12 2YW

My Reference: MA2.10

Date: 6<sup>th</sup> July 2010

Dear Ms Kyte

**Examination of Caerphilly County Borough LDP – Alternative Housing Sites**

The Inspector has previously indicated to the Council that it may wish to consider which additional sites would, in its view, be the most appropriate candidates for inclusion as additional housing sites within the Plan in the event of a conclusion that the Plan currently is deficient in this respect. He is aware that the Council has undertaken some preliminary work in this respect.

Having considered all of the submitted evidence, and in particular the evidence relating to the delivery of new housing on the former Bedwas Colliery site, the Inspector has serious concerns about the Plan's ability to deliver sufficient housing in accordance with the moderate growth strategy chosen for the Plan period. In his view the housing delivery strategy is unacceptably compromised by the reliance on the former Bedwas Colliery site for the delivery of 630 units within the Plan period. Whilst he accepts that there will always be a degree of uncertainty so far as anticipation of development is concerned, particularly looking forward to the later stages of the Plan period, the balance of evidence points to a commencement of development of the site no sooner than 2017, even on the most optimistic scenario. Taking into account the necessary infrastructure provision and the normal trajectory of site development, the Inspector considers that, even allowing for the presence of more than one developer on the site, no more than 350-400 units could be expected to be contributed by this site within the Plan period. Accordingly, there is a need to consider how this shortfall of 230-280 units might be addressed.

The Inspector recognises that the Bedwas Colliery site allocation is made on the basis that the site will not contribute to housing delivery until the final years of the Plan period. He has also taken into account the position as regards the overall provision for delivery of housing within the Plan beyond the number of units estimated by the moderate growth strategy. However, given the extent of reliance on brownfield land for delivery of housing he considers that an allowance for choice and flexibility needs to be maintained and that it

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would not be appropriate to treat this existing flexibility provision as making up for the lower level of delivery by the Bedwas Colliery site now identified.

The Inspector appreciates the readiness of the Council to look at options, which might exist for additional housing land allocations. However, it is important to remember that the scope for the Inspector to recommend changes in order to make a Plan sound is limited. In particular the Inspector needs to ensure that the changes he recommends will not materially alter the substance of the overall Plan and its policies, or undermine the sustainability appraisal and participatory processes that have been undertaken. In suggesting options for additional housing site allocations, therefore, the Council should only include sites which have already been considered as part of the Candidate and Alternative Sites process, and whose potential inclusion within the Plan has been properly publicised. In addition, the sites concerned should not require new proposals (such as allocations for school sites not already fully consulted over as part of the plan preparation process).

In the light of the foregoing, the Inspector would like to have the Council's observations as to the available options for changes to the Plan, which would meet these requirements.

Yours faithfully

Barbara Prosser  
Programme Officer

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