

DEPOSIT LOCAL DEVELOPMENT PLAN  
UP TO 2021

INITIAL  
CONSULTATION  
REPORT  
(PREFERRED STRATEGY)

October 2008

CYNLLUN ADNEUO DATBLYGU LLEOL  
UP TO 2021

ADRODDIAD  
YMGYNGHOROL  
CYCHWYNNOL  
(STRATEGAETH DDEWISEDIG)

Hydref 2008



**CAERPHILLY COUNTY BOROUGH  
LOCAL DEVELOPMENT PLAN UP TO 2021  
INITIAL CONSULTATION REPORT**

<b>CONTENTS</b>	<b>Page</b>
1. Introduction	1
2. Compliance with the Delivery Agreement	1
3. Consultation Bodies	1
4. Management Groups	1
(a) The LDP Focus Group	
(b) The Stakeholder Panel	
(c) The Sustainability Group	
5. Community involvement in Pre-Deposit Process	2
6. The Pre-Deposit Consultation	3
7. Responses to the Consultation	4
8. The preparation of the Deposit LDP	5
9. Equality Impact Assessment	5

**Appendices**

1	Consultation Bodies
	A Specific Consultation Bodies
	B General Consultation Bodies
	C Other Consultees
2	LDP Focus Group: Terms of Reference
3	LDP Focus Group: Membership
4	Stakeholder Panel: Terms of Reference
5	Sustainability Group: Terms of Reference
6	Representation Forms
	A Preferred Strategy Representation Form
	B SEA/SA Representation Form
7	Main issues raised in the Preferred Strategy Consultation
8	Report of Standing Conference 14 July 2008

**Annexes**

1	Representations on the Preferred Strategy
2	Representations on the SEA

## 1 Introduction

- 1.1 This document represents the **Initial Consultation Report** that the Council is required to prepare for the purposes of Section 16 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005.
- 1.2 In accordance with the Regulations, the Report identifies:
- (a) bodies engaged or consulted at the pre-deposit public consultation stage;
  - (b) the main issues raised, and how they have influenced the preparation of the Deposit Local Development Plan (LDP);
  - (c) the steps taken to publicise plan preparation, and how this complies with the Community Involvement Scheme contained in the Delivery Agreement.
- 1.3 The Report includes in the Annexes the detailed responses of the Council to the relevant individual representations made in the public consultation on the Preferred Strategy, and indicates how these have influenced the policies and proposals in the Deposit LDP.

## 2 Compliance with the Delivery Agreement

- 2.1 The Delivery Agreement (DA) for the Caerphilly County Borough Local Development Plan commits the Council to producing the LDP according to the stated timescales laid down by the Timetable and in accordance with the consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA.
- 2.2 The Timetable contained in the DA has been followed, but because of the work necessary following the consultation on the Preferred Strategy it was agreed to utilise the four months flexibility allowed for in the Timetable and delay the consultation on the Deposit LDP from April 2008 to Autumn 2008.
- 2.3 The consultation processes contained within the Community Involvement Scheme (CIS) have been followed, with one minor exception (see Paragraph 5.3 below).

## 3. Consultation Bodies

- 3.1 The Consultation Database contains at any time the details of all of the interested persons and bodies of which Council is aware who wish to be consulted during the preparation of the LDP.
- 3.2 The list is of course continually changing, but an indication of the range of bodies that were consulted in the preparation of the Deposit Plan is indicated by the lists of consultation bodies at the start of the process as detailed in the Delivery Agreement. These are repeated in Appendix 1, as follows:
- |             |                              |
|-------------|------------------------------|
| Appendix 1A | Specific Consultation Bodies |
| Appendix 1B | General Consultation Bodies  |
| Appendix 1C | Other Consultees             |

## 4. Management Groups

- 4.1 The Council has established three Groups to assist in the preparation of the Caerphilly LDP and speed up decision-making.

**(a) The LDP Focus Group**

- 4.2 The LDP Focus Group is an internal group of the Council that has responsibility for overseeing all of the stages involved in the preparation of the Local Development Plan. The Terms of Reference of the Group are shown in Appendix 2A, and the membership of the Group is in Appendix 2.

**The Stakeholder Panel**

- 4.3 The Stakeholder Panel consists of residents of the county borough and representatives of a wide range of local groups and organisations to ensure that a cross section of views can be debated as part of the public participation into the preparation of the Local Development Plan. The Terms of Reference of the Group are shown in Appendix 3, and the membership of the Group in Appendix 4.
- 4.4 The membership of the Stakeholder Panel was drawn from 40 representatives as follows:
- (a) 20 members from Statutory Consultation bodies, General Consultation Bodies, and the Caerphilly Standing Conference;
  - (b) 10 members of the General Public (profiled to reflect the population of the county borough); and
  - (c) 10 members of local groups organizations, including representatives of 'Hard to Reach' Groups.
- 4.5 All organizations/groups that were selected for the Stakeholder Panel were approached for nominees. A stakeholder mapping exercise was undertaken to ensure that the Panel comprised a cross section of interests in order to provide a balanced view.
- 4.6 The Panel acts as a sounding board for emerging policies and proposals debated as part of the public participation into the Plan.

**The Sustainability Group**

- 4.7 The Sustainability Group is a group of experts from both inside the Council and external bodies that advises on the environmental impact and the sustainability of proposals arising during the preparation of the Local Development Plan. The Terms of Reference of the Group, which include the membership of the Group, are shown in Appendix 5.

**5. Community Involvement in the Pre-Deposit Process**

- 5.1 Community involvement is a fundamental feature of the LDP process, and is intended to achieve consensus throughout the preparation of the Plan. The Community Involvement Scheme (CIS) in the Delivery Agreement details the ways in which the Council has sought to secure this involvement.
- 5.2 The LDP Focus Group met on six occasions during the Pre-Deposit process, as follows:  
20 February 2006; 13 April 2006; 28 July 2006; 7 February 2007; 26 June 2008; and 23 July 2008.
- 5.3 The Stakeholder Panel met on three occasions during the Pre-Deposit process, as follows:  
27 February; 24 August 2006; and 15 February 2007.

A meeting of the Panel was arranged for 18 July 2008 to consider the Draft Deposit LDP, but unfortunately the number of apologies received meant that the meeting would have been inquorate, and the meeting was therefore cancelled.

- 5.4 The Sustainability Group met on fourteen occasions, as follows  
8 March 2006; 27 April 2006; 17 August 2006; 11 October 2006; 30 November 2006; 23 January 2007; 9 November 2007; 13 December 2007; 30 March 2008; 9 April 2008; 1 May 2008; 15 May 2008; 19 June 2008; and 3 July 2008.
- 5.5 The Minutes of all of these meetings of the Management Groups have been made available on the Council's Website.
- 5.6 In addition, in accordance with the Delivery Agreement there was consultation on the Scoping Report for the SEA/SA between 14 June and 19 July 2006: this consultation was restricted to the Specific Consultation Bodies. It may be noted that this consultation was carried out over the required five-week period, rather than the four-week period that was proposed in the DA before the statutory period had been decided.

## **6. The Pre-Deposit Consultation**

- 6.1 In accordance with the Regulations, consultation on the Pre-Deposit documents, including the SEA/SA, was carried out for the six-week period between 19 April and 30 May 2007. The consultation documents were made available at the Council's Planning Offices, at all public libraries in the county borough, and on the Council's Website. Public exhibitions were held between the 20 April 2007 and 11 May 2007.
- 6.2 The Preferred Strategy document identified the Key Issues for the county borough that the Plan sought to address, the Vision for Caerphilly of the Plan, the alternative Development Options considered, and the Council's Preferred Strategy for the future development of the area. It should be noted in particular that the Preferred Strategy did not identify any site allocations. The Preferred Strategy document was accompanied by twelve Appendices in a separate document.
- 6.2 The SEA / SA documents consisted of the following:
- (a) The Scoping Report;
  - (b) The Review of Relevant Plans, Programmes, and Policies; and
  - (c) The Assessment of the Preferred and Alternative Strategies.
- 6.3 In addition to these documents, the Council also published the Candidate Sites Register, together with the initial assessments that had been made of their suitability for development, and of their compatibility with the Preferred Strategy..
- 6.4 The Council has previously invited anyone with an interest in land in the County Borough to submit their sites for consideration for inclusion in the LDP: these sites have been termed "Candidate Sites." The Candidate Sites had been provisionally assessed to see if they were sustainable, and if they were compatible with the Preferred and Alternative Strategy Options, and the results were reported in Appendix 10 of the Preferred Strategy. Comments were invited on the assessments of the compatibility of the candidate sites with the Strategic Options considered.
- 6.5 In an attempt to engage as wide an audience as possible in the Pre-Deposit public consultation exercise, the Council used a variety of means of communication as outlined in the CIS. The consultation methods used included:
- letter to Specific Consultation Bodies;
  - letter to General Consultation Bodies;

- letter to individuals on the LDP mailing list;
- advertisements in the Press (Argus, Campaign, Echo, Western Mail & London Gazette);
- two-week radio advertising campaign on Red Dragon FM;
- text Messaging (to all those subscribed to the Council's text messaging service);
- poster Campaign (displayed within selected Post Offices and Public Houses in each ward of the County Borough);
- mobile exhibitions (in and out of normal office hours) in the settlements of Caerphilly, Blackwood, Ystrad Mynach, Nelson, Risca, Rhymney, Newbridge and Bedwas;
- static exhibition based in the reception of the Council Offices in Pontllanfraith during normal office hours;
- press article in the April edition of the Council publication 'Newslines';
- notification of Pre-Deposit Consultation through each of the Community Partnerships; and
- consultation material available on Council's Website.

People were requested to make representations in respect of the Preferred Strategy to the Council in writing.

- 6.6 To assist consultees in the Pre-Deposit Consultation, two Representation Forms were used, i.e., one for the Preferred Strategy documents, and one for the SEA/SA documents. These Representation Forms are shown in Appendix 6.

## **7. Responses to the Consultation**

- 7.1 A total of 3,060 representations were received during the statutory consultation period. The initial assessment of the representations indicated that:

- There were two notable petitions in terms of numbers: There were 1,590 signatures to a petition concerned about the possible development of the Bedwas Colliery Site for urban uses, and 280 names on a petition wishing for Blackwood Golf Course to remain undeveloped.
- The publication of the Candidate Sites Register generated a large number of responses in relation to sites, chief among these were Ty Du at Nelson (600 responses), St. Ilans at Caerphilly (240 responses), and sites at Cefn Hengoed (200 responses).
- Of the remainder, a significant number of representations were received from proposers of Candidate Sites, disappointed by the poor scoring of their site in the Council's initial assessment.
- Finally, although small in number, there were significant comments received from Welsh Assembly Government (WAG), Statutory Bodies and Commercial Organisations on the Preferred Strategy itself and on the Report on the Strategic Environmental Assessment / Sustainability Appraisal.

- 7.2 While many of those listed in the first three bullet points above were single issue representations, the particular responses described by the last bullet point raised many more individual issues and were far more complicated in scope and depth. For example, one of these respondents raised 125 different issues. Although every comment received due examination, the bulk of officer effort was devoted to the consideration of these difficult issues relating to the LDP Strategy and the SEA/SA.

- 7.3 A report for Council was prepared on the main issues raised in the consultation, and this is reproduced in Appendix 7.
- 7.4 Detailed responses to the Representations made on the Preferred Strategy documents are contained in Annex A to this Report.
- 7.5 In cases where representations have been accepted by the Council, efforts have been made to identify the parts of the Deposit LDP that reflect the representation: however, since the Deposit LDP is not simply a revision of the Preferred Strategy, but rather a new document, this has not always been possible.
- 7.6 It must also be noted that Annex A does not include responses to most of the representations that were made on the Council's initial assessment of sites on the Sites Register. The Consultation on the Preferred Strategy was not primarily concerned with these site assessments, although the Sites Register was published at the same time as the Consultation. Representations on these assessments were therefore taken into account later in the plan preparation process, when sites were being chosen for inclusion within the Deposit LDP. The only exceptions to this were where representations were made on the Council's assessment of the site's compatibility or otherwise with the Preferred Strategy, on which (see Paragraph 6.4 above) comments had been invited.
- 7.6 Detailed responses to the representations made on the SEA/SA documents are contained in Annex B to this Report.

## **8. The preparation of the Deposit LDP**

- 8.1 The representations received in the Preferred Strategy Consultation were taken into account in the preparation of the Deposit LDP as detailed in the Annexes to this Report.
- 8.2 As noted above (see in Paragraph 7.50, there were problems in identifying how representations on the Preferred Strategy have been taken into account in the Deposit Plan, because the Preferred Strategy document was not a Draft Plan. It must also be noted that while the Council may consider that representations have been taken into account, representors may disagree.
- 8.3 The representations received on the Council's Initial Site Assessments were considered and taken into account in deciding on the sites to be allocated for development in the Deposit Plan. It may be noted that many of these representations, those on Ty Du, Nelson in particular, were overtaken by events, in that planning permission for development was granted before the Deposit Plan was prepared.
- 8.4 In the LDP preparation process, a particularly important role in securing community involvement was played by the Council's Standing Conference. The Standing Conference considered the Draft Deposit LDP at their meeting held on 14 July 2008, and a report of this meeting is attached as Appendix 8.

## **9 Equality Impact Assessment**

- 9.1 The Equality Impact Assessment has been developed by Caerphilly County Borough Council as part of its statutory and moral commitments to ensure that no individuals or groups are discriminated against on the basis of colour, ethnicity, sex, age, marital status, sexual orientation, disability, religion, language or nationality, whether they are service users, staff or other stakeholders. The Council

- is committed to ensuring that no institutional discrimination exists across the range of its functions and activities.
- 9.2 The Assessment is designed to gauge the impact of policies and procedures on staff and service users through a checklist of questions. It is not therefore specifically designed for the assessment of Council strategies, which perhaps require a different approach.
  - 9.3 This is particularly the case with the Local Development Plan, which is the Council's over-arching land-use policy statement. The Plan identifies land suitable for all types of development over a fifteen-year period, and therefore necessarily incorporates the proposals of a number of agencies, including public bodies and statutory undertakers. The Council is obviously not responsible for the strategies of external bodies, or the extent to which these take equality issues into account by the agencies responsible.
  - 9.4 However, it has been decided to complete the Equality Impact Assessment form (replacing "policy" with "strategy") to check that the LDP does not discriminate against particular groups, and to identify the positive contribution the LDP makes to the equalities agenda. The completed form is included as Appendix 9 to this Report.
  - 9.5 In practice, one of the most effective contributions that the LDP makes to the equalities agenda lies not in its content, but rather in the Plan preparation process. This requires the involvement a wide range of organisations and individuals, in an effort to achieve consensus on the policies and proposals in the Plan. The public consultations on the Plan, which are an essential part of the process, are by far the largest consultation exercises carried out by the Council, and differ fundamentally from most of them.
  - 9.6 In general the Council's public consultations (e.g. the Household Survey) present a small number of options with tick boxes, and the analysis consists simply of counting the numbers of ticks. In contrast, in the public consultations on the LDP anyone affected by or interested in the Plan is invited to comment on any aspect of the Plan. These representations are reported in detail to Council, together with an analysis of the issues raised and the Proposed Council response. This analysis is necessarily often lengthy and complex, and is made in the knowledge that it can be challenged at a Public Inquiry, possibly by a barrister on behalf of the representor: it may be noted, for example, that the Initial Representation Report on the first stage of the LDP process, the Preferred Strategy, ran to over 500 pages.
  - 9.7 The significant point of this consultation process for equality issues is that it provides the opportunity for all interested bodies and individuals to examine and comment on all of the land-use implications of the policies and programmes of both the Council and other development agencies, and to receive a detailed response (at least on the planning issues raised) from the Council. This opportunity could play a significant role in progressing equality issues by raising and debating them in a transparent and democratic process.

# Appendices

- 1 Consultation Bodies
  - A Specific Consultation Bodies
  - B General Consultation Bodies
  - C Other Consultees
  
- 2 LDP Focus Group: Terms of Reference
  
- 3 LDP Focus Group: Membership
  
- 4 Stakeholder Panel: Terms of Reference
  
- 5 Sustainability Group: Terms of Reference
  
- 6 Representation Forms
  - A Preferred Strategy Representation Form
  - B SEA/SA Representation Form
  
- 7 Main issues raised in the Preferred Strategy Consultation
  
- 8 Report of Standing Conference 14 July 2008
  
- 9 Equality Impact Assessment

## **APPENDIX 1A    SPECIFIC CONSULTATION BODIES**

All Town and Community Councils  
British Gas Plc  
British Telecom  
Caerphilly Local Health Board  
CADW  
Castle Transmission International  
Celtic Energy Ltd  
Countryside council for Wales  
Dwr Cymru/Welsh Water  
Environment Agency  
Hyder Consulting  
Mercury Personal communications  
Millennium Communications Network Ltd  
Mono Consultants (acting on behalf of mobile phone operators)  
National Grid  
NTL UK  
Powergen  
RWE nPower  
Secretary of State for Transport  
(in relation to previous Strategic Rail authority functions)  
South East Wales Local Planning Authorities  
SWALEC  
Telecom Securicor Cellular Radio  
The Coal Authority  
Transco  
Virgin Mobile  
Wales and West Utilities  
Welsh Assembly Government  
Welsh Water  
Western Power Distribution

## **APPENDIX 1B GENERAL CONSULTATION BODIES**

28 Community Partnerships  
(including Community First Partnerships)  
Age Concern Cymru  
Age Concern Gwent  
All Wales Ethnic Minority Association  
Ancient Monument Society  
Argoed Senior Citizens Association  
Arriva Trains  
Arthritis Care in Wales  
Arthritis Research Campaign  
Arts Council for Wales  
Assembly Members  
Bargoed YMCA  
Bargoed, Hengoed and New Tredegar Methodist Churches  
Barnardos  
Barnardos Caerphilly Open Door Service  
Bedwas and District Conservation Association  
Bedwas Comprehensive School  
Bedwas Penguins Swimming Club for the Disabled  
Bedwellty Area OAP Association  
Bethany Apostolic Church  
Bethany Baptist Church  
Bethel Baptist Church  
Black Environment Network  
Blackwood and District Alzheimer's Society  
Blackwood Central Methodist Church  
Blackwood Comprehensive School  
Blackwood Little Theatre  
Blackwood VIP Club (Vision Impaired)  
BTCV Cymru  
Business in Focus  
Business in the Community Cymru  
Caerphilly Business Forum  
Caerphilly County Youth Theatre  
Caerphilly Local Historical Society  
Caerphilly North Ward Aged Persons Welfare Committee  
Caerphilly OAP Association  
Caerphilly Round Table  
Calafaria Baptist Church  
Cardiff/Newport and Gwent Chamber of Commerce and Industry  
Cardiff Gypsy and Traveller Project  
Cardiff International Airport  
Care Council for Wales  
Carers Support GP Disability Wales  
Cascade Methodist Church  
Central Electricity Generating Board  
Centre for Help and Advice for Disabled  
Church in Wales  
Churches in Action  
Coleg Gwent

## **APPENDIX 1B GENERAL CONSULTATION BODIES (CONTINUED)**

Commission for Racial Equality  
Congregational Chapel Markham  
County Land and Business Association  
Crosskeys Methodist Church  
Cwmcarn High School  
Cwmcarn OAP Association  
Disability Wales  
Drug Aid  
Early Retirement Group  
Elim Pentecostal Church  
Employment Opportunities for People with Disabilities  
English Baptist Church  
Equal Opportunities Commission  
Friends, Families and Traveller  
GACO  
GAVO Creative Play Project  
Gelligaer OAP  
Gigabites Youth Project (Churches inAction)  
Gilfach Old Peoples Welfare Committee  
Goundwork Caerphilly  
Gwent Autistic Society  
Gwent Health Authority  
Gwent Valley Health Promotional  
Gwent Wildlife Trust  
Healthy Living Centres  
Hengoed Branch OAP's  
Institute of Civil Engineers  
Institute of Directors  
Islwyn Methodist Church  
Kids in Caerphilly  
Lesbian, Gay, Bisexual Forum  
Lewis School Pengam  
Llwynon Allotments Association  
Local Chambers of Trade  
Lower Islwyn Health Water Group  
Moriah Christian Fellowship  
National Express Plc  
National Farmers Union Wales  
National Museum and Galleries of Wales  
Newbridge Comprehensive School  
Newbridge Methodist Church  
Oakdale Comprehensive  
One Voice Wales  
Pandy Senior Citizen Club  
Penuel Congregational Chapel, Nelson  
Pontllanfraith Comprehensive School  
Presbyterian Church of Wales Trinity  
National Assembly Members  
Rhymney Valley Access Group  
Rhymney Valley Autistic Society  
Rhymney Valley Trades Council  
Rhymney Valley Young at Heart

## **APPENDIX 1B GENERAL CONSULTATION BODIES (CONTINUED)**

Rhymni Valley MIND  
Risca Young at Heart  
Royal National Institute of the Blind  
Salem Methodist Church  
Senghenydd Youth Drop-in Centre  
St Andrews Church Caerphilly  
St Catherine's Church Caerphilly  
St Cenydd Comprehensive School  
St David's Methodist Church  
St Ilan Comprehensive School  
St Margaret's Church, Blackwood  
St Martin's Comprehensive School  
St Martin's Church Caerphilly  
St Martin's OAP Association  
St Martin's Ward OAP Association  
Sustrains Cymru  
Tabernacle Baptist Church  
The Church of Jesus Christ of Latter Day Saints  
(Caerphilly and Blackwood)  
The Civic Trust for Wales  
The Coal Authority  
The Gypsy Council for Health, Education and  
Welfare  
The National Trust  
The Parish of Eglwysilan  
The Planning Inspectorate  
The Theatres Trust  
Traveller Law Reform Coalition  
Trethomas Christian Fellowship  
Trinant Methodist Church  
Trinity Congregational Church  
Tuesday Club for the Deaf, Bargoed  
Valleys Art Marketing  
Virgin Mobile  
Voluntary Arts Wales  
Wales Association of Community and Town  
Councils  
Wales Council for the Blind  
Wales Council for the Deaf  
Wales Disability Rights Commission  
Wales Tourist Board  
Welsh Development Agency  
Welsh Language Board  
Ystrad Mynach Methodist Church

## **APPENDIX 1C OTHER CONSULTEES**

Airport Operator  
British Aggregates Association  
British Geological Survey  
British Waterways, Canal Owners and Navigation Authorities  
Centre for Ecology and Hydrology  
Chambers of Commerce, Local CBI and Local Branches of Institute Directors  
Civil Aviation Authority  
Commission for Racial Equality  
County Landowners and Business Association  
Crosskeys Coach Hire  
Crown Estate Office  
Design Commission for Wales  
Disability Rights Commission  
Disability Wales  
Disabled Persons Transport Advisory Committee  
Electricity, Gas and Telecommunication Companies and Nation Grid Co, ELWa  
Environmental Groups at National & Regional Level  
Environmental Services Agency (Waste)  
Equal Opportunities Commission  
European Peoples Party and European Democrats  
Federation of Small Businesses  
Fire and Rescue Services  
Forestry Commission Wales  
Freight Transport Association  
GB Engineering Co(Wales) Ltd  
Greens/European Free Alliance  
Group/Civic Societies  
Gypsy Council  
Health and Safety Executive  
Housing Developers  
LidL UK GMBH  
Local Community, Conservation and Amenity Group, including Agenda 21  
Local Transport Operators  
National Farmers Union for Wales  
Network Rail and train Operating Companies  
One Voice Wales  
Party of the European Socialist  
Planning/Consultants  
Planning Aid Wales  
Police Architectural Liaison Officers  
Port Operators  
Post Office Property Holdings

## **APPENDIX 1C OTHER CONSULTEES (CONTINUED)**

Professional Bodies e.g. Royal Institution of  
Chartered Surveyors Wales  
Quarry Products Association Wales  
Rail Freight Group  
Sports Council for Wales  
The Home Builders Federation  
Traveller Law Reform Coalition  
Wales Council for Voluntary Action  
Wales Environment Link  
Wales Tourist Board  
Water Companies  
Welsh Development Agency  
Welsh Environmental Services Association  
Department for Transport  
Department for Trade and Industry  
Home Office  
Ministry of Defence

**APPENDIX 2**  
**THE LDP FOCUS GROUP**  
**TERMS OF REFERENCE (revised 26 June 2008)**

**Primary Purpose**

The Local Development Plan (LDP) Focus Group will test policy and proposals at key stages throughout the plan preparation process as outlined in the Delivery Agreement.

**Objectives**

The LDP Focus Group will:

- monitor the progress of the LDP in relation to the scheduled time-table contained in the Delivery Agreement
- fulfil the function otherwise carried out by full Council to sign off intermediate stages of plan preparation in order to speed up decision making
- contribute to the plan preparation process by meeting at key stages to help to generate options and alternatives for inclusion in draft policy papers and documents
- receive and take account of the recommendations from the SA/SEA working group with regard to sustainability issues arising from the plan preparation process
- receive and take account of the comments from the Stakeholder Panel arising out of the various public involvement stages in the plan preparation process
- receive and take account of the representations from the General Public arising out of the various public involvement stages in the plan preparation process

**Mandate**

- to be an internal group of key individuals; both Members and Officers of the Council
- to be an active working group, functioning to create a corporate consensus view rather than as individuals pursuing sectional interests

**Composition**

The group will comprise a small group of key Elected Members and cross-directorate representatives:

Leader (substituted by Deputy Leaders as appropriate)

Cabinet Member for Transportation & Planning

Cabinet Member for Living Environment & Housing

Cabinet Member for Regeneration

Cabinet Member for Education and Leisure

Chair of the Planning Committee

Vice-Chair of the Planning Committee

Leader of the Majority Opposition

A nominated Member of the Majority Opposition

A nominated Member representing the Independents

A Member representative of the Sustainable Development Advisory Panel

A nominated female Member

Chief Planning Officer

Chief Engineer

Chief Housing Officer

Head of Economic Development, Tourism & European Affairs  
Head of Information, Communications & Technology Services  
Head of Lifelong Learning and Leisure, Education & Leisure  
Head of Performance Management  
Head of Planning and Strategy, Education & Leisure  
Head of Public Protection  
Head of Public Services  
Assistant Director, Resourcing and Performance, Social Services  
Principal Solicitor for Planning, Land and Highways  
Regeneration Partnership Co-ordinator

(Note: individuals are invited to join the Group based on the role they fulfil within the Authority and not on the basis of their individual interest. Therefore as Members / Officers leave their current role / post, their place on the Group would also be relinquished.)

### **Quorum**

It is recognised that not all officers and members identified will be available to attend every meeting scheduled throughout the process, nor would that be necessarily appropriate at every stage. It is agreed that substitutes will only be acceptable where they were of equal or sufficient status to have both the capacity and authority to make high level decisions on behalf of the Council. To enable a LDP Focus Group Meeting to proceed it is proposed that there should be a quorum of seven people, four of whom should be Elected Members.

### **Chairman**

An Elected Member will be appointed to Chair the LDP Focus Group in the inaugural meeting.

### **Frequency**

The LDP Focus Group will meet as necessary in order to provide its advice on the key stages in the Plan preparation process. In order to assist Members of the group, these meeting dates will be established as far in advance as possible by reference to the Timetable produced as part of the LDP Delivery Agreement. Where any meeting is likely to take a full day to complete business it will be scheduled over two half days instead in order to fit more easily with other work commitments.

### **Agendas**

It will be the responsibility of the Team Leader, Strategic and Development Plans to agree the agenda in consultation with the Leader, or one of his Deputies, and the Focus Group Chairman. All material for discussion by the Group will be released onto the 'web' for public access. Group Members will receive all papers seven days before meetings. If there are no adverse comments within these seven days these papers will subsequently be published on the 'web'. Requests for the Group to deal with 'Any Other Business' will be considered by the Chairman.

### **Reporting Mechanism**

Minutes of the LDP Focus Group will be submitted for scrutiny purposes to the Regeneration Scrutiny Committee. Any matter requiring a Policy decision will be reported to Council. Every Member of the Council will be able to access the minutes via the internet and a copy placed in the Members Room.

### **Agreed Changes since inception:**

**Members:**

- *A nominated female Member is included.*

**Officer Posts:**

- *The Assistant Director, Resourcing and Performance, Social Services replaces the Director of Social Services.*
- *The Head of Information, Communications & Technology Services replaces the Chief Property Officer.*
- *The Head of Performance Management replaces the Head of Policy & Central Services.*
- *The Team Leader, Sustainable Development and Living Environment Partnership replaces both the Living Environment Partnership Co-ordinator and the Sustainable Development Co-ordinator, these posts having been combined.*

### **APPENDIX 3 LDP FOCUS GROUP MEMBERSHIP**

Leader (substituted by Deputy  
Leaders as appropriate)  
Cabinet Member for Transportation & Planning  
Cabinet Member for Living Environment & Housing  
Cabinet Member for Regeneration  
Cabinet Member for Education and Leisure  
Chair Planning  
Vice Chair of Planning  
Leader of the Majority Opposition  
1 nominated member of the Majority Opposition  
1 nominated member representing both  
Independent Groups  
A representative of the Sustainable  
Development Advisory Panel  
Chief Planning Officer  
Chief Engineer  
Head of Lifelong Learning and Leisure  
Head of Planning and Strategy, Education and Leisure  
Chief Housing Officer  
Chief Property Officer  
Head of Policy and Central Services  
Head of Economic Development, Tourism & European Affairs  
Head of Public Services  
Head of Social Services  
Head of Public Protection  
Living Environment Co-ordinator  
Regeneration Co-ordinator  
Sustainable Development Co-ordinator

#### **Note**

Individuals were invited to join the Group based on the role they fulfil within the authority, and not on the basis of their individual interest. Therefore as officers/members leave their current role/post their place on the group would also be relinquished.

## **APPENDIX 4 STAKEHOLDER PANEL TERMS OF REFERENCE**

### **Primary Purpose**

The LDP Stakeholder Panel will act as a sounding board for emerging policies and proposals and will be the forum for structured discussions to ensure that a cross section of views can be debated as part of the public participation into the Local Development Plan.

### **Objectives**

The Stakeholder Panel will:

- Contribute to the plan preparation process by helping to generate options and alternatives for inclusion in draft policy papers and documents
- Assist in the development and revision of the LDP policies and proposals
- Make unified recommendations on all matters up for discussion to the LDP Focus Group

### **Mandate**

The Stakeholder Panel is to be an advisory group and as such will only operate successfully if a coherent and balanced viewpoint is maintained via compromise and consensus building. Therefore Members of the Panel will need to:

- Be committed to working toward producing the optimum solutions that will assist and inform the plan-making process
- Work comprehensively within the Panel, accommodating views that are different from their own, seeking consensus and accepting compromise to reach agreement on the issues before them
- Be open minded and consider the whole picture, not seeking to promote sectional interests
- Be able and willing to make the necessary decisions and recommendations on behalf of the Panel to the LDP Focus Group

### **Composition**

The Stakeholder Panel will comprise 40 members as follows:

- 20 members drawn from Statutory Consultation Bodies, General Consultation Bodies and the Caerphilly Standing Conference
- 10 members of the General Public (profiled to reflect the population of CCBC)
- 10 members of local organisations, which will include representatives of 'Hard to Reach' groups.

All organisations/groups that have expressed an interest in the Stakeholder Panel have been considered for membership. A stakeholder mapping exercise has been undertaken to ensure that the Panel comprises a cross section of interests in order to provide a balanced view.

The Stakeholder Panel will have to consider how to secure membership representing groups where currently there has been no interest expressed in involvement with the plan preparation process.

**Quorum**

It is recognised that not all those identified will be available to attend every meeting scheduled throughout the process, nor would that be appropriate necessarily at every stage. The Panel is not a formal decision making body, but its role as a sounding board is an extremely important one.

Therefore, to enable a viable discussion to proceed at Stakeholder Panel Meetings it is proposed that there should be a quorum of fourteen people.

**Chairman**

The Stakeholder Panel meetings will normally operate in a workshop format to be facilitated by officers from the Council's Planning Division. The meetings will not, therefore, be chaired, although the facilitators will seek to resolve differences in order to draw out and record the consensus view.

**Frequency**

The Stakeholder Panel will meet as necessary in order to provide its views on the key stages in the Plan preparation process.

**Agendas**

Information for each meeting will be sent to Panel members to be received no later than 7 days before the date of the meeting. As the meetings will be facilitated workshop discussions, agendas will not be necessary.

**Reporting Mechanism**

A record of the discussions and recommendations from each Stakeholder Panel meeting will be produced by the facilitators and be submitted to the LDP Focus Group for its consideration.

## **APPENDIX 5 SUSTAINABILITY GROUP TERMS OF REFERENCE**

### **Primary Purpose**

The Group will provide expert advice and information to assist in the production of the Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) for the emerging Caerphilly Local Development Plan.

### **Objectives**

The Working Group will:

- Assist in the development of the methodology for the SA/SEA.
- Assist in the identification and quantification of Sustainability Objectives and monitoring criteria.
- Assist in the development and revision of the Assessment Framework against which the LDP policies and implication will be assessed.
- Consider the assessment of the plan implications and make recommendations to the LDP Focus Group/LDP Stakeholder Panel for amendments to the LDP based on environmental and sustainability grounds.
- Make recommendations on consultation matters to the LDP Focus Group.

### **Mandate**

The Working Group is an advisory Group, without decision making powers and as such will only operate successfully if the aim of producing a coherent and balanced SA/SEA is maintained, and compromise and consensus building are achieved. Therefore Members of the Group will need to:

- Be able and willing to make decisions and recommendations on behalf of their body at the meetings in respect of the SA/SEA.
- Be committed to working toward producing an SA/SEA that will assist and inform the plan making process.
- Work with the group, accommodating views that are different from their own, seeking consensus and accepting compromise to reach agreement on the issues before the group.
- Be open minded and consider the whole picture, not seeking to promote sectional interests.
- Buy into the improved SA/SEA and support and encourage its appropriate implementation.

### **Composition**

The Working Group will comprise of the following 29 members:

#### *Council Representatives*

- Landscape
- Ecology
- Conservation (Buildings)
- Energy
- Sustainability

- Building Control
- Economic Development
- Research Officer
- Leisure
- Highways
- Housing
- Education
- Environmental Health (Pollution)
- Health Improvement
- Waste Management
- Community Safety
- Waste Strategy

#### *External Representatives*

- Countryside Council for Wales
- Environment Agency
- CADW
- Welsh Water
- British Telecom
- Welsh Development Agency
- Farmer Union of Wales
- Health Authority
- Gwent Association of Voluntary Organisations (GAVO)
- Police
- Glamorgan Gwent Archaeological Trust
- Forestry Commission

#### **Substitutes**

It is accepted that some members may not be able to make every meeting. A representative may be sent in place of the original member subject to two requirements, both of which need to be satisfied:

- The substitute is fully aware of the outcomes of previous meetings and is in a position to actively participate.
- The substitute complies with the requirements of the Membership mandate.

Where no suitable substitute is possible, any input the member wishes to make on the information before the Group should be submitted to the Council, in writing, to arrive no later than 3 days before the date of any meeting, in order for the information to be reviewed and presented to the Group as appropriate.

#### **Chairman**

The Group meetings will generally take the form of a facilitated discussion. Whilst it would not normally be the case that such meetings would require a Chair, the SA/SEA (in conjunction with the LDP) is being produced within a very strict timescale. Consequently the meetings will need to have a mechanism for resolving issues that cannot be agreed by mutual compromise. Consequently the meeting will be chaired by the Principal Planner (Countryside), with the Vice-Chair being the principal Planner (Strategic and Development Planning).

## **Quorum**

The Working group is not a formal decision making body. As decisions will not be made at the meetings it is not necessary to have a quorum limit.

## **Frequency**

The Working Group will meet as and when required. This may result in long periods where meetings are not necessary, and periods where a number of meetings are required. In order for members to have the necessary time to include meetings into their schedules, dates for meetings will be set for at least 6 months in advance of each meeting.

It may be necessary, due to unforeseen circumstances, to call a meeting at relatively short notice (precluding the 6 month advance notice). Special Meetings will only be called where the need for the meeting is urgent and where the outcomes from the meeting are required to ensure compliance with LDP Delivery Agreement. Where a Special Meeting is called, members will be afforded the maximum amount of notice that is possible within the timeframe allowed.

## **Information**

Information for each meeting will be sent to members of the Working Group to be received no later than 14 days prior to the date of the meeting.

In order to ensure that the meetings are focussed, and to achieve the outcomes necessary and within the timescale laid out by the Delivery Agreement, a schedule of outcomes for each meeting will be included in the meeting documentation.

## **Resolving Disagreement**

The Group is advisory only in nature and will assist in the production of the SA/SEA. However the decision making process for content of the document will rest with the Planning section of the Council. The Meeting Chair and vice-chair will, therefore, be responsible for considering any issues where a consensus view is not possible, and determine the appropriate action for the SA/SEA. For such issues the Meeting Chairs will report the decision back to the next meeting of the Group.

## **Reporting Mechanism**

A record of the discussions and agreements from each meeting will be produced and will be made available for public inspection on the internet . All records will be reported to the relevant Scrutiny Committee as part of the process.

Any recommendations for changes to the LDP document, or for consultations on the SA/SEA document will be reported to the LDP Focus Group for decision-making.



# **APPENDIX 6**

## **REPRESENTATION FORMS**

A Preferred Strategy Representation Form

B SEA/SA Representation Form

## NOTES ON THE CONSULTATION ON THE PREFERRED STRATEGY

The Caerphilly Local Development Plan (LDP) will be the strategic land use document that will set out the Council's land use policies and proposals to control the development and use of land within the county borough for the 15-year period up to 2021.

The Council is currently preparing the Preferred Strategy for the Plan. The Preferred Strategy will set out the key aims and objectives for the LDP, and will identify in general terms areas where development will be encouraged, and areas which will be protected from development.

The Preferred Strategy document is accompanied by a separate volume containing 12 Appendices that provide background information on the Strategy and its preparation.

The Preferred Strategy has to be the subject of Sustainability Appraisal, on which your comments are also invited. The Sustainability Appraisal consists of three documents:

- (1) The Scoping Report
- (2) The Review of Relevant Plans, Programmes, and Policies
- (3) The Assessment of the Preferred and Alternative Strategies

Please use the accompanying (green) Sustainability Appraisal Representation Form if you wish to comment on this.

**The Preferred Strategy does not identify individual sites for development.** Following this consultation on the Preferred Strategy the Council will prepare the Deposit Plan that will allocate sites to implement the agreed strategy. This will be the subject of consultation next year, when you can give your views on the individual sites that have been selected.

However, the Council has previously invited anyone with an interest in land in the County

Borough to submit their sites for consideration for inclusion in the LDP: these sites have been termed **Candidate Sites**. A register of the Candidate sites has been set up and contains plans for all of the submitted sites. The register is called the **Candidate Site Register**, and is available for inspection during the consultation period at every library in the County Borough and at the Council Offices at Pontllanfraith. It will also appear on the Council's webpage.

The Candidate Sites have been provisionally assessed to see if they are sustainable and if they are compatible with the Preferred and Alternative Strategy Options, and the results of this are reported in Appendix 10 of the Preferred Strategy. Your comments are invited on these assessments of the compatibility of the candidate sites with the Strategic Options considered. Please note that you will have to consult the Candidate Sites Register to identify the boundaries of the sites listed in Appendix 10.

**Note:** The provisional assessments of the Candidate Sites may be changed as plan preparation proceeds, because all of the sites will be subjected to further detailed assessment. It may also be the case that additional sites are submitted in the process and if so these will become subject to public consultation in due course.

**PLEASE NOTE THAT ALL REPRESENTATIONS RECEIVED WILL BE MADE AVAILABLE FOR PUBLIC INSPECTION, AND CANNOT BE TREATED AS CONFIDENTIAL.**

**FOR FURTHER INFORMATION OR ASSISTANCE, PLEASE LOOK ON THE COUNCIL'S WEBSITE - [www.caerphilly.gov.uk](http://www.caerphilly.gov.uk)**

e-mail the LDP Team - [ldp@caerphilly.gov.uk](mailto:ldp@caerphilly.gov.uk)  
Phone the LDP Hotline - **01495-235-376**



For Office Use Contributor Number:  
Contribution Number:  
Representation Number:

# CAERPHILLY LOCAL DEVELOPMENT PLAN 2006-2021

## Preferred Strategy Representation Form

**PLEASE READ THE NOTES ON THE BACK PAGE BEFORE COMPLETING THIS FORM**

Completed forms should be returned by **Wednesday 30 May 2007** to:

The LDP Team  
Caerphilly County Borough Council, Council Offices,  
Pontllanfraith, Blackwood, NP12 2YW.

Please use a separate form for each comment you wish to make. Further copies can be obtained from the Local Development Plan Team, or you can photocopy this form.

Contact Details	
Personal Details	Agents Details (if applicable)
Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Job Title (if applicable)	<input type="text"/>
Organisation (if applicable)	<input type="text"/>
Address	<input type="text"/>
Post Code	<input type="text"/>
E-mail Address	<input type="text"/>
Telephone No.	<input type="text"/>

To which part of the LDP does your representation relate?

Either Preferred Strategy  (tick if appropriate)  
or Appendix  (please specify Appendix No.)

Please specify as appropriate:

Page No.   
Paragraph No.   
Policy No.

If your comment refers to Appendix 10, please specify also:

Candidate Site Reference

Please use the space below to set out your representation.

Please use the space below to say what changes (if any) you would like to be made to the Preferred Strategy

We would also appreciate your views on the consultation process for the LDP Preferred Strategy.

How satisfied are you with the consultation process?

Very satisfied  Satisfied  Dissatisfied

If you are dissatisfied, how would you like to see the consultation process changed?

How did you find out about this consultation? Newsline  Poster  Newspaper   
Radio  Letter  Other

**THANK YOU FOR YOUR COMMENTS ON THE PREFERRED STRATEGY**

Completed forms should be returned to  
The LDP Team, Caerphilly County Borough Council,  
Council Offices, Pontllanfraith, Blackwood, NP12 2YW.

**REPRESENTATIONS SHOULD BE RETURNED BY WEDNESDAY 30 MAY 2007  
REPRESENTATIONS RECEIVED AFTER THIS DATE WILL NOT BE CONSIDERED**

## NOTES ON THE CONSULTATION ON THE PREFERRED STRATEGY

The Caerphilly Local Development Plan (LDP) will be the strategic land use document that will set out the Council's land use policies and proposals to control the development and use of land within the county borough for the 15-year period up to 2021.

The Council is currently preparing the Preferred Strategy for the Plan. The Preferred Strategy will set out the key aims and objectives for the LDP, and will identify in general terms areas where development will be encouraged, and areas which will be protected from development.

The Preferred Strategy document is accompanied by a separate volume containing 12 Appendices that provide background information on the Strategy and its preparation.

The Preferred Strategy consists of 2 documents:

- (1) Preferred Strategy
- (2) Preferred Strategy Appendices

Please use the accompanying (purple) Preferred Strategy Representation Form if you wish to comment on the Preferred Strategy itself.

**The Preferred Strategy does not identify individual sites for development.** Following this consultation on the Preferred Strategy the Council will prepare the Deposit Plan that will allocate sites to implement the agreed strategy. This will be the subject of consultation next year, when you can give your views on the individual sites that have been selected.

However, the Council has previously invited anyone with an interest in land in the County Borough to submit their sites for consideration for inclusion in the LDP: these sites have been termed **Candidate Sites**. A register of the Cand-

idate sites has been set up and contains plans for all of the submitted sites. The register is called the **Candidate Site Register**, and is available for inspection during the consultation period at every library in the County Borough and at the Council Offices at Pontllanfraith. It will also appear on the Council's webpage.

The Candidate Sites have been provisionally assessed to see if they are sustainable and if they are compatible with the Preferred and Alternative Strategy Options, and the results of this are reported in Appendix 10 of the Preferred Strategy. Your comments are invited on these assessments of the compatibility of the candidate sites with the Strategic Options considered. Please note that you will have to consult the Candidate Sites Register to identify the boundaries of the sites listed in Appendix 10.

**Note:** The provisional assessments of the Candidate Sites may be changed as plan preparation proceeds, because all of the sites will be subjected to further detailed assessment. It may also be the case that additional sites are submitted in the process and if so these will become subject to public consultation in due course.

**PLEASE NOTE THAT ALL REPRESENTATIONS RECEIVED WILL BE MADE AVAILABLE FOR PUBLIC INSPECTION, AND CANNOT BE TREATED AS CONFIDENTIAL.**

**FOR FURTHER INFORMATION OR ASSISTANCE, PLEASE LOOK ON THE COUNCIL'S WEBSITE - [www.caerphilly.gov.uk](http://www.caerphilly.gov.uk)**

e-mail the LDP Team - [ldp@caerphilly.gov.uk](mailto:ldp@caerphilly.gov.uk)

Phone the LDP Hotline - 01495-235-376



For Office Use Contributor Number:  
Contribution Number:  
Representation Number:

## CAERPHELLY LOCAL DEVELOPMENT PLAN 2006-2021

### Preferred Strategy Strategic Environmental Assessment /Sustainability Appraisal, Part 1 Representation Form

**PLEASE READ THE NOTES ON THE BACK PAGE BEFORE COMPLETING THIS FORM**

Completed forms should be returned by **Wednesday 30 May 2007** to:

The LDP Team  
Caerphilly County Borough Council, Council Offices,  
Pontllanfraith, Blackwood, NP12 2YW.

Please use a separate form for each comment you wish to make. Further copies can be obtained from the Local Development Plan Team, or you can photocopy this form.

#### Contact Details

	Personal Details	Agents Details (if applicable)
Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (if applicable)	<input type="text"/>	<input type="text"/>
Organisation (if applicable)	<input type="text"/>	<input type="text"/>
Address	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text"/>	<input type="text"/>
Telephone No.	<input type="text"/>	<input type="text"/>

To which document of the Strategic Environmental Assessment does your representation relate?

- The Scoping Report
- The Review of Relevant Plans, Programmes, and Policies
- The Assessment of the Preferred and Alternative Strategies

Please specify as appropriate:

Page No.

Paragraph No.

Please use the space below to set out your representation.

Please use the space below to say what changes (if any) you would like to be made to the Strategic Environmental Assessment

We would also appreciate your views on the consultation process for the LDP Preferred Strategy.

How satisfied are you with the consultation process?

Very satisfied  Satisfied  Dissatisfied

If you are dissatisfied, how would you like to see the consultation process changed?

How did you find out about this consultation? Newline  Poster  Newspaper   
Radio  Letter  Other

**THANK YOU FOR YOUR COMMENTS ON THE PREFERRED STRATEGY**

Completed forms should be returned to  
The LDP Team, Caerphilly County Borough Council,  
Council Offices, Pontllanfraith, Blackwood, NP12 2YW.

**REPRESENTATIONS SHOULD BE RETURNED BY WEDNESDAY 30 MAY 2007  
REPRESENTATIONS RECEIVED AFTER THIS DATE WILL NOT BE CONSIDERED**

## **APPENDIX 7 Main issues raised in the Preferred Strategy Consultation**

1. A total of 3,060 representations were received during the statutory consultation period. The initial assessment of the representations indicated that:
  - There were two notable petitions in terms of numbers: There were 1590 signatures to a petition concerned about the possible development of the Bedwas Colliery Site for urban uses, and 280 names on a petition wishing for Blackwood Golf Course to remain undeveloped.
  - The publication of the Candidate Sites Register generated a large number of responses in relation to sites, chief among these were Ty Du at Nelson (600 responses), St. Ilans at Caerphilly (240 responses), and sites at Cefn Hengoed (200 responses).
  - Of the remainder, a significant number of representations were received from proposers of Candidate Sites, disappointed by the poor scoring of their site in the Council's initial assessment.
  - Finally, although small in number, there were significant comments received from Welsh Assembly Government (WAG), Statutory Bodies and Commercial Organisations on the Preferred Strategy itself and on the Report on the Strategic Environmental Assessment / Sustainability Appraisal.
2. While many of those listed in the first three bullet points above were single issue representations, the particular responses described by the last bullet point raised many more individual issues and were far more complicated in scope and depth. For example, one of these respondents raised 125 different issues. Although every comment received due examination, the bulk of officer effort was devoted to the consideration of these difficult issues relating to the LDP Strategy and the SEA / SA.

### **Revisions to the Preferred Strategy**

4. Overall there has been general acceptance of the main thrust of the Strategy proposed by the Council. Comments have concentrated on detailed points where it has been suggested that improvements and additions to the strategy description and changes to the strategic policies would be beneficial. These points have been considered and many of the criticisms are accepted. Going forward it is intended that these points form the basis for a revised plan strategy which will be completed and presented to the public as part of the Deposit Plan. It is important to note that the LDP preparation process does not envisage that the finalised deposit strategy be prepared and published in isolation prior to the Deposit Plan document. Therefore the revised version will be part of that Plan which will go to public consultation next Summer after Council's approval of the content.

### **Summary of the main Strategy Issues raised**

5. There follows a select list of the more significant representations on the preferred strategy and strategic policies. This is by no means an exhaustive record.

### **Support for the Strategy**

- The LDP vision is clear as is the process of arriving at it.
- The overall vision appears to be well integrated with the Community Strategy.
- The Preferred Strategy aligns well with the emerging framework for development in South Wales.
- The Preferred Strategy promotes balanced growth in accord with the Wales Spatial Plan (WSP) and Heads of the Valleys (HOV) regeneration strategy.

- The strategic options and preferred strategy are broadly relevant to the borough.
- The reference to the reduced necessity to identify a substantial number of new greenfield sites is welcomed.
- The protection of the environment contained in the policy is welcomed.
- The emphasis to retain the distinct identities of residential areas is supported.
- The commitment to retention of open space within development boundaries is much to be welcomed.
- The longer-term plans for improved rail infrastructure are supported.

### **Overall Concern with the Strategy**

- The Preferred Strategy is overly long and complex with a confusing mix of description and policy. The key issues, plan objectives, the plan vision and the strategic spatial options considered should be made clearer.
- There does not appear to be much evidence of clear internal consistency between the major drivers of change in the County.
- The setting of clear and SMART plan objectives is also critical for subsequent plan monitoring purposes.
- The Preferred Strategy should be sufficiently flexible to respond to changes in the economy, housing apportionment, strategic site take up, WSP and other changes including HOV strategy delivery risks.
- The Preferred Strategy should be clear on how the contextual strategies, including the WSP area work, and those strategies of neighbouring authorities, have influenced it.

### **Concern for Particular Aspects of the Strategy**

- It is important to promote a mix of land uses for every settlement that can meet the needs of the immediate and also of the wider community.
- The Preferred Strategy should be clearer about the potential amount and location for affordable housing.
- Residential development should be given equal priority to that of non-residential development in principal towns because it is a key driver in strengthening their vitality and viability.
- Regeneration would be best achieved by concentrating on areas that are conducive to investment and align economic growth with housing growth. This may allow growth to trickle over into less fortunate areas.
- To promote growth in the Principal Towns and Key Settlements in the Northern Connections Corridor at the expense of the actual regeneration powerhouse, i.e. Caerphilly and the Southern Connections Corridor, will have an adverse effect on the County Borough as a whole. Also, if there is a misalignment between housing growth and job growth, it will result in an increase in commuting, traffic congestion and pollution.
- The strategy should not resist housing development on brownfield sites in the Southern Connections Corridor. Given the problems of house choice and affordability, and the fact that there will be no restriction on employment opportunities, the Strategy has the potential to undermine the role and function of Caerphilly and the Southern Connections Corridor.

- If the strategy provided sufficient housing in the areas that will attract the most investment, it would reduce the need to travel and contribute significantly to a sustainable resource efficient settlement pattern. In addition, the developer contributions would play a vital role in upgrading the transport network and so allow growth to be spread throughout the county borough in a more resource efficient and sustainable manner.
- There is little evidence that alternative economic scenarios of growth have been considered, and the Analysis Note does not refer to an employment forecast. Though UDP employment sites have been subjected to a formal appraisal it is unclear in the text what the outcome has been in terms of reconfirmation of sites or allocation for other uses. Analysis of the economic linkages between Cardiff, the M4 corridor and the southern part of CCBC is weak. There is no reference to economic opportunities / threats and the influence that this has had on the strategy. There is a strong impression that existing employment sites are being confirmed rather than alternative options considered and the strategy is highly concentrated on a few large sites - particularly Oakdale. The Preferred Strategy has a reliance on restraint in the south - Brownfield development and settlement boundary restraint - but the positive mechanisms to encourage development to divert to the north rather than elsewhere out of the area are not yet sufficiently considered. On this basis there should be emphasis on monitoring and management - a regular review of employment land take up and assessment of land use alternatives, and the use of implementation mechanisms such as planning obligations and phasing need to be examined.
- There is a significant oversupply of employment land compared with a limited future land requirement for growth to 2016, and there is a high instance of out - commuting from the County to other areas, particularly along the M4 corridor. The County will need a high quality and competitive stock of employment land which meets the requirements of modern occupiers. A balanced disposition of land uses linked into existing land use patterns and sustainable transport infrastructure improvements is required. It is unlikely that a significant amount of job growth will be of the traditional general industry classification, and so consideration should be given to the contribution of retail and service sector contributions towards job growth.
- There should be an assessment of retail need and identification of gaps in provision that exist or will arise from the strategy. If there are key strategic retail sites that need identification or key settlements that need retail consolidation, they should be identified. The retail requirements of the Preferred Strategy and their relationship to the Wales Spatial Plan key settlements for the region should be considered.
- Where possible non-residential development opportunities should be focussed on the Principal Towns, in order to ensure their continued viability, as centres for economic and social activity, but any proposed economic growth should be aligned with sufficient housing growth to accommodate it.
- There is concern that easing of congestion points on the core road network, will encourage increased car use, and add to CO2 emissions.
- There should be greater discussion of 'public transport' to move emphasis away from the road network.
- There needs to be recognition that a modal shift to using rail transport should occur as early as possible within the life of the LDP.

- Reference should be included in respect of potential increase in use of buses within the county borough.
- Reference should be made to walking and cycling for recreation and commuting.
- The lack of reference in the Strategy to Green Wedges is very surprising, given that this most important anti-coalescence designation is mentioned in the appendices.
- Greenfield sites on the edge of settlements should not be released except in cases in which it is very certain that this will have the desired effect of ensuring that they will continue to be sustained.
- It is to be hoped that no new greenfield allocations will be made in the Basin area.
- The protection and retention of trees, woodlands and hedgerows is a vital matter.
- Sufficient land for open space must be retained in all new housing developments, especially where house-building will lead to loss of informal open space that has been of value to the community.
- The preferred strategy does not explain how it relates to public investment strategies such as water / sewerage / flood provision and protection infrastructure investment. The strategy choice should encourage sites where provision exists and / or where problems can be solved and development can be phased. The spatial implications of whether new provision is needed and whether, and how, it can be provided should be considered as part of arriving at (and providing justification for) the preferred option. Clear evidence should be provided of how the key issue of infrastructure capacity / requirements have affected the development of the Preferred Strategy.
- The Preferred Strategy relates solely to the provision of Transport infrastructure. Local planning authorities should consider the capacity of existing and potential infrastructure (foul water) and phasing of development.
- A Strategic Flood Consequence Assessment and a Broad Level Assessment relevant to Strategic Sites should be undertaken and the findings incorporated into the Assessment process.
- The identified key sites for growth cannot be supported at the present time as they are unsound. A credible and coherent evidence base needs to be provided for the basis of the identification of the key sites for growth. This is an issue that requires resolution and will be highlighted at the Deposit Stage.
- The greenfield functional floodplain should be protected from development and the Preferred Strategy should be amended to reflect that Highly Vulnerable developments must not be permitted in Zone C2 areas.
- If the floodplain is a key area of implementation, its role in delivering strategy, should be clarified and be made explicit. Where the strategy relies on sites in the flood plain there may be a need to undertake some broad level assessment which provides for an understanding of flooding consequences to ensure that sites which are significant in terms of supporting the preferred strategy can be taken forward. Clear evidence should be provided of how the key issue of flood risk has affected the development of the preferred strategy.
- Considerations from the Regional Waste Plan should be included within the LDP as it develops.

- The Strategy and the strategic policies on minerals do not meet national requirements set out in national planning guidance. The LDP should make a commitment to, and identify the options for, meeting the contribution to be identified in the Regional Technical Statement to meet local, regional and national needs.
- The relationship between the Preferred Strategy and the safeguarding of minerals is not sufficiently clear. The Strategy should set out where coal operations would not be acceptable, with unequivocal statements as to why. The SA / SEA should be one of the processes used to reach these conclusions.
- Consideration of Energy in the plan fails to take account of the role of fossil fuels until alternatives are developed. The aims of the Plan are to encourage the increased use of renewable energy and reduce the amount of energy used. It should be taken as read that the majority of energy supply will be supplied through fossil fuel based sources, as is currently the case, and in line with UK energy policy.
- There is strong objection to the Preferred Strategy's intention 'not to protect' the established coal reserve at Nant Llesg in the Upper Rhymney Valley. In this respect Caerphilly's strategy is deficient in addressing the requirements of Minerals Planning Policy Wales. The LDP will cover fifteen years - a period during which untold jeopardy could be caused to the Nant Llesg coal reserve if it is not protected.
- The Preferred Strategy should fully take into account the Regional Technical Statement (RTS) for Aggregates and the contribution to be made by Caerphilly Borough. The Preferred Strategy should set out the contribution to be made by Caerphilly to the identified aggregates demand and the requirement for land banks.
- The strategic safeguarding policy needs to protect the primary and secondary resource areas, excluding settlements and national / international designations. Consideration of minerals safeguarding should be explicit in site assessment and settlement boundary definition.
- Whilst the general concept of the Valleys Regional Park is supported, it is felt that such an initiative would impinge upon the amount of otherwise developable land within the Upper Rhymney Valley, and that new residential and commercial development would better enable the north of the Borough to strengthen its economic position.
- The Preferred Strategy acknowledges that the town of Caerphilly within the Southern Connections Corridor represents the County Borough's most attractive area to potential investors. However, the statement to the effect that a strategy which relies on the south of the County Borough for economic progress is unsustainable in the long term is unqualified and is not supported by firm evidence. To restrict development in a principal town to brownfield sites is unsustainable as the town needs to maintain its status in the settlement hierarchy of South East Wales as a major retail, tourism and employment centre. Emphasis is placed on the redevelopment of existing sites and not on the release of any substantial new Greenfield land. However, it is a fact that previously developed land is a finite resource and this has diminished significantly in the Caerphilly area. It is therefore considered that the LDP will need to identify Greenfield sites in the basin area to accommodate future housing needs. Therefore there is objection to the Strategy document on the basis that it seeks to restrict growth in the Caerphilly area to brownfield sites. Such sites, Bedwas Colliery is an example, have high development costs and are not likely to be

developed in the shorter term. The town of Caerphilly needs to continue to provide a range and choice of housing sites to meet continuing requirements.

### **Comments on the Draft Strategic Policies**

6. Below is a summary of the general comments on the draft strategic policies.
  - Generally the strategic policies do not appear clear or specific enough to deliver on the narrative contained in the preferred approach. The narrative acknowledges priorities for areas and potential tensions but the policies do not shed light on how tensions will be resolved and what the priorities will be in particular areas. The draft strategic policies should be the key delivery mechanisms for areas of change in the preferred spatial strategy.
  - Below is an example of a detail-specific comment on a draft strategic policy.
  - The Strategy and Policy SP12 are inconsistent with Minerals TAN 2, and should be amended to safeguard the Nant Llesg coal reserve because it is of strategic significance for Wales and the UK.

### **Summary of the main SEA / SA Issues raised**

- The Council sought to involve the public in the consultation exercise by means of a number of different information routes some of which were innovative for the Plan preparation process. In total there were 7 respondents who sent comments relating to the SEA/SA, which were received during the statutory period. For the purposes of this summary the comments relating to the SEA/SA are deemed to be those made in respect of the following:
  - SEA/SA Document 1: The Scoping Report
  - SEA/SA Document 2: The Review of Relevant Plans, Programmes and Policies
  - SEA/SA Document 3: The Assessment Of The Preferred and Alternative LDP Strategies
  - Preferred Strategy Document Chapter 9: SEA/SA Assessments of the Strategy **Options**
  - Preferred Strategy Appendices Document Appendix 12: Assessment of the Preferred Strategy – Mitigation Table
- In total 102 representations on the SEA/SA have been received, 10 of which are in support, 22 are general comments, whilst 70 are objecting. It is pleasing to note that only one objection was received in relation to the process of the SEA/SA, and this was based upon a misinterpretation of the information provided in the documents. The SEA/SA being a self contained document and being separate from the LDP has been handled differently to the LDP Strategy itself. As a self-contained document the comments have not only been considered, but have also resulted in some amendments being proposed. In general terms the representations received raised the following significant issues, with the their respective actions:
  - Scoping Report - Indicators and Targets: The vast majority of representations seeking changes to the Scoping Report requested either changes to or deletions of indicators and targets. Appropriate amendments have been made in accordance with some of the representations. In addition representations have sought the inclusion of 3 new indicators and 1 new target. Amendments have not been made in respect of any of these as it as felt that there was not sufficient justification for their inclusion.

- Review of Relevant Plans Programmes and Policies – Review of Additional Documentation: A number of documents relevant to the production of the LDP have been identified and their review under Document 2 has been requested. All of these documents will be reviewed and will be included in Document 2 at the appropriate level.
  - Assessment of Preferred & Alternative Strategies – Energy, Minerals & Waste: The major comments in respect of the Assessments related to the handling of the energy, minerals (including coal) and waste issues. All of the comments objected to a lack of information and subsequent assessment of the LDP which was not comprehensive enough. This issue primarily derives from the content of the LDP Strategy document. Concerns in this area will be addressed as part of the redrafting of the Strategy.
  - Assessment of Preferred & Alternative Strategies – Habitats Regulations Assessment: Key comments on Document 3 related to the fact that the Assessment of the LDP failed to undertake an Habitats Regulations Assessment (HRA) of the LDP. Whilst HRAA is required as part of the SEA/SA process, the SEA/SA documents were produced before the publication of guidance on undertaking HRA, so HRA was not included at that time. In agreement with CCW, references were included in the SEA/SA documentation identifying that AA was to be undertaken as part of the next stages of the SEA/SA process. This is still the case.
  - Assessment of Preferred & Alternative Strategies – Strategic Flood Consequence Assessment (SFCA): Another important issue raised in representations was the fact that the assessment of the LDP failed to undertake SFCA. As the Strategy did not include any strategic sites and the decisions on the locations of allocations for the LDP had yet to be made, it was inappropriate to undertake such an exercise. Consideration will be given to the issue of flooding in the assessment of the Deposit version of the LDP and there will undoubtedly be indicators and assessment tests on the flooding issue.
  - Assessment of Preferred & Alternative Strategies – Justification for Not Using the most Sustainable Strategy Option: The most important comment relating to the assessments is a cross document issue relating to both the LDP Strategy Document and the SEA/SA Document 3, i.e. the LDP Strategy is not the most sustainable of the alternative Strategies. Whilst some justification is given to support the choice of the LDP Strategy, representations have requested bolstering this justification. This will need to be undertaken as and when the LDP Strategy is reviewed.
  - Preferred Strategy Appendices (Appendix 12) – Amendments to mitigation: Once again representations sought changes to the mitigation to the Preferred Strategy as outlined in the Appendix. Where appropriate change have been made, although the changes will be dependant upon how the LDP Strategy is redrafted and on subsequent re-assessments.
7. The SEA/SA process is iterative with the production of the LDP, each informing the other as the process of producing the LDP continues. Consequently the SEA/SA is not a final version, as SEA/SA assessments will be required to be undertaken on the redrafted strategy document, with changes being prompted by representations on the strategy itself. Many of the amendments and rewordings proposed in response to the representations received on the SEA/SA will be negated by changes to the strategy document. However the main issues and points raised through these changes will be incorporated in the revised strategy. Overall identifying changes to the SEA/SA is difficult without having first produced the redrafted strategy document. However all of

the issues raised above will be incorporated into the both the SEA/SA and Strategy documents as appropriate.

### **Candidate Sites Comment and the Way Forward**

8. The main reason for the publication of the sites register along with the Preferred Strategy was to create and maintain a transparent Plan preparation process. In addition, the publication enabled the public to envisage some of the choices available to the Council in selecting those candidate sites most appropriate to implement the Plan Strategy. A number of sites have received adverse comment from the public and the reasons given for their disapproval are noted. These points will be taken forward and weighed in the consideration of site allocation selection during the creation of the Deposit Plan.

## **APPENDIX 8 REPORT OF STANDING CONFERENCE 14 JULY 2008**

1. The Caerphilly Standing Conference has had continuous involvement in the development of the LDP, developing the vision, alternative strategic options and the Preferred Strategy. As part of the Pre-Deposit consultation on the Deposit Plan, a special meeting of the Standing Conference was held on Monday 14<sup>th</sup> July. The purpose of this meeting was threefold:
  - to ensure that partner organisations realise the implications of the LDP on their service areas
  - to ensure that the LDP is capable of delivering those parts of the Community Strategy that are reliant on land use for implementation; and
  - to engage partners fully in the process to secure on-going involvement in the development of the plan
2. It was explained to delegates that the Plan has been produced in three parts:
  - Part 1 outlines the Development Strategy and provides the strategy policies necessary to implement it;
  - Part 2 provides a suite of county wide policies that will control the development and use of land on a day to day basis through development control procedures; and
  - Part 3 provides the area specific and site specific policies that need to be delivered on the ground in terms of site allocations.
3. Delegates were divided into four workshop groups to consider how the policies in Parts 1 & 2 of the emerging LDP deliver on the objectives of the Community Strategy. Delegates were provided with worksheets containing the objectives of the Community Strategy and the relevant strategy and county-wide policy/ies in the emerging LDP capable of delivering the objectives. Delegates were asked specifically to look at 'gaps' – the absence of any strategy / county-wide policy to deliver an objective of the Community Strategy. Delegates were asked to specifically consider:

- gaps that are there by necessity, objectives focussed on 'process' and not land-use that the LDP is unable to deliver
  - the gap is there and the LDP is capable of addressing / delivering the objective of the community strategy through the incorporation of an additional policy
  - the gap is there but the LDP is not the appropriate policy tool to deliver the objective as there is a better strategy / tool for delivery of that particular objective.
4. The purpose of this report is:
- to record and analyse the information and opinions gathered as part of the workshop;
  - to provide a clear indication of where there was consensus or otherwise in terms of delivering the objectives of the community strategy; and
  - To highlight amendments that have been made to the Deposit Plan in light of stakeholder participation from the Standing Conference.

## **ANALYSIS OF WORKSHOP FINDINGS**

### **Theme: The Living Environment**

*Objective:* Promote a culture of community self-help, cohesion and citizen involvement in decision making

*Workshop outcome:* All four groups came to the consensus that the above objective does not require a policy in the LDP as the objective is related to 'process.' The groups noted that citizen involvement has been integral to the development of the plan. Amendments to the LDP are not required to accommodate this objective as the Community Involvement Scheme as set out in the Delivery Agreement sufficiently addresses community involvement in the plan-making process.

### **Theme: Regeneration**

*Objective:* Encourage, promote and develop opportunities for volunteering

*Workshop outcome:* All four groups came to the consensus that the above objective does not require a policy in the LDP as the objective is related to volunteering which is part of a 'process' and is not related to a specific land use.

*Objective:* Develop and promote business advice and support systems to encourage innovative, sustainable and legitimate business practice including local purchasing initiatives.

*Workshop outcome:* All four groups came to the consensus that the above objective should not be accommodated by a policy in the LDP as the LDP is not the most appropriate policy tool to deliver on this objective. The Regeneration Strategic Partnership was identified as the appropriate body to deliver on this objective.

### **Theme: Education for Life**

*Objective:* Ensure the development of learning opportunities for all ages and abilities with an emphasis on community-based opportunities.

*Workshop outcome:* Two groups came to the consensus that a strategy policy was necessary to deliver this objective and suggested amending the plan to include a strategy

policy which makes provision for educational facilities over the plan period. One group concluded that the objective could be delivered sufficiently by allocations in Part C of the LDP and the other group concluded that the LDP was not the appropriate policy tool to deliver the above objective as it is already delivered by Flying Start and the Children's Framework.

*Objective:* Ensure that children and young people have a foundation that enables them to take advantage of all life opportunities.

*Workshop outcome:* Two groups came to the consensus that the LDP was not the appropriate policy tool to deliver the above objective and noted that the objective is currently and more appropriately being addressed by Flying Start and the Children's Framework. One group concluded that the objective could be delivered sufficiently by allocations in Part C of the LDP. The fourth group concluded that a strategy policy was necessary to deliver this objective and suggested amending the plan to include a strategy policy which makes provision for educational facilities over the plan period.

*Objective:* Provide advice and information on all public and voluntary sector services

*Workshop outcome:* All four groups came to the consensus that the above objective should not be accommodated by a policy in the LDP as the objective does not relate to land-use.

*Objective:* Raise awareness and use of the Welsh language

*Workshop outcome:* Two groups came to the consensus that the objective did not relate to land use and that a Welsh language policy was not required in the LDP as the LDP complies with the Welsh Language Act and Council Policy. One group considered a strategy policy that takes into account and respects the Welsh language and the remaining group failed to comment in relation to this objective.

*Objective:* Ensure a highly skilled and educated workforce to support the regeneration of Caerphilly County Borough

*Workshop outcome:* Two groups came to the consensus that the objective was vocational as well as academic and did not consider the objective to be land-use based or appropriate to be addressed by the LDP. Instead it was considered that the objective was best delivered by the SMART Alternative Strategy or by an overarching education and regeneration strategy. One group considered it necessary for the plan to incorporate a strategy policy to cover 'education for life' in its broadest sense so that adequate provision is made over the plan period and the remaining group failed to comment in relation to this objective.

*Objective:* Expand and develop community-based health and social care services

*Workshop outcome:* Three groups reached consensus and considered that the LDP was not the appropriate policy tool to deliver the above objective as it is better delivered by the Health Social Care & Well-being Strategy. One group considered it necessary to incorporate a strategy policy within the LDP for Health Social Care & Well-being to ensure that adequate provision is made over the plan period.

*Objective:* Develop and strengthen preventative work and service provision for vulnerable children and adults.

*Workshop outcome:* All four groups reached consensus and considered that the above objective was not related to land-use and that the LDP was not the appropriate tool to address this objective. Delegates highlighted the Health Social Care & Wellbeing Strategy, the Children & Young People Partnership, The Community Safety Plan, the Social Services Accommodation Strategy and the strategy for the protection of vulnerable adults as a more appropriate policy framework for delivering the above objective.

## **RECOMMENDATIONS**

The Council should consider the merits of amending the Deposit Plan for the inclusion of the following overarching strategy policies that ensure that adequate provision is made for facilities over the Plan period:

Education; and

Health Social Care & Wellbeing.

## APPENDIX WORKSHOP SESSION FINDINGS

### The Living Environment

Objective	Comment
Promote a culture of community self-help, cohesion and citizen involvement in decision making	Group 1: The objective does not require a policy in the LDP but should be integral to the development of the plan. The objective is related to 'process'
	Group 2: The objective does not require a policy in the LDP as the objective is related to 'process' and is covered in the Community Involvement Scheme
	Group 3: The objective does not require a policy but could potentially be signposted by the LDP.
	Group 4: The objective does not require a policy in the LDP as the objective is related to 'process'

### Regeneration

Encourage, promote and develop opportunities for volunteering	Group 1: there may be land use implications in terms of necessary facilities to accommodate groups but a policy is not required as this can be addressed through allocations or other documents
	Group 2: Volunteering is part of a process and is not related to a specific land use. Given that this is covered sufficiently by the CIS the Plan does not require a policy to deliver this objective
	Group 3: This objective is process related and so therefore does not require a policy
	Group 4: : Not considered to require a policy within the plan as the plan is not the appropriate vehicle to deliver this objective
Develop and promote business advice and support systems to encourage innovative, sustainable and legitimate business practice including local purchasing	Group 1: Not considered to be a land-use objective that should be addressed by the LDP as it should be addressed by external bodies such as WAG
	Group 2: Not considered to be a land-use objective that should be addressed by the LDP, it should be delivered through other strategies such as the Smart Alternative

initiatives	Group 3: Not considered to be a land-use objective that should be addressed by the LDP – Is more appropriately addressed by the Regeneration Strategic Partnership
	Group 4: The objective does not require a policy in the LDP as consultation with the Regeneration Partnership has been integral to the development of the plan. The objective is related to 'process'

### Education For Life

Ensure the development of learning opportunities for all ages and abilities with an emphasis on community-based opportunities	Group 1: Not considered to require a policy within the plan as it is covered by land-use allocations
	Group 2: A strategy policy is required to make provision for educational facilities over the plan period
	Group 3: The objective is covered by the Children's Framework and Flying Start and therefore does not require a policy in the LDP.
	Group 4: A strategy policy is required to deal with community facilities
Ensure that children and young people have a foundation that enables them to take advantage of all life opportunities	Group 1: Not considered to require a policy as provision is made through land use allocations in section C of the plan
	Group 2: A strategy policy is required to make provision for educational facilities over the plan period
	Group 3: The objective is covered by the Children's Framework and Flying Start and therefore does not require a policy in the LDP.
	Group 4: Not considered to require a policy as this objective is delivered by other plans including the Single Plan, Flying Start and 14-19 Pathways
Enhance education and training opportunities for 14-19 year olds and improve standards	Group 1: Not considered to be a land use objective that the plan can address, therefore no policy required
	Group 2: The LDP is not the appropriate tool for addressing this objective as it should be addressed by the Development Unit in WAG
	Group 3: The objective is covered by the Pathways programme and therefore does not require a policy in the LDP.

	Group 4: Not considered to be a land use objective that the plan can address as the objective relates to 'process', therefore no policy required
Provide advice and information on all public and voluntary sector services	Group 1: Not considered to be a land-use objective that should be addressed by the LDP as it should be delivered by customer care centres and one stop shops
	Group 2: Not considered to be a land-use objective that should be addressed by the LDP as it should be delivered by other means
	Group 3: Not considered to be a land use objective that the plan can address as the objective relates to 'process'. The objective is delivered by COMPACT
	Group 4: Not considered to be a land use objective that the plan can address as the objective relates to 'process'
Raise awareness and use of the Welsh language	Group 1: Not discussed
	Group 2: A strategy policy is required to take account and give respect to the Welsh language
	Group 3: A Welsh language policy is not required in the LDP as the LDP complies with the Welsh Language Act and Council Policy
	Group 4: Not considered to be a land use objective that the plan can address as the objective relates to 'process'
Ensure a highly skilled and educated workforce to support the regeneration of Caerphilly County Borough	Group 1: Not discussed
	Group 2: A strategy policy is required to cover provision for 'education for life' in its broadest sense (which includes skills training) so that adequate provision is made over the plan period
	Group 3: This objective is vocational as well as academic and is delivered by the SMART Alternative Strategy
	Group 4: Not considered to be a land-use objective that should be addressed by the LDP but should be addressed by an overarching education and regeneration strategy

Expand and develop community based health and social care services	Group 1: Not considered to require a policy as provision is made through land use allocations and the plan is informed by the Health Social Care & Well-being Strategy
	Group 2: This objective is addressed by the Health Social Care & Well-being Strategy, however a strategy policy is needed to ensure provision for Health, Social Care & Wellbeing
	Group 3: This objective is addressed by the Health Social Care & Well-being Strategy
	Group 4: This objective is addressed by the Health Social Care & Well-being Strategy
Develop and strengthen preventative work and service provision for vulnerable children and adults	Group 1: Not considered to be a land-use objective that should be addressed by the LDP as it is addressed by other documents`
	Group 2: Not considered to be a land-use objective and is delivered by other strategies including the Protection for Vulnerable Adults Policy and the Child Protection Policy
	Group 3: This objective is addressed by the Health Social Care & Wellbeing Strategy, the Children & Young Peoples Partnership, Kaleidoscope, and the Community Safety Plan.
	Group 4: There is a county-wide policy - Housing for People in need of care but social service provision should be addressed by the Social Services Accommodation Strategy

## APPENDIX 9 EQUALITY IMPACT ASSESSMENT

**Document:** Caerphilly Deposit Local Development Plan

**Prepared by:** Rhian Kyte, Team Leader, Strategic & Development Plans

### PURPOSE

**1. What is the strategy intended to achieve?**

The LDP is the Council's over-arching land-use strategy for the period up to 2021. The Plan identifies land suitable for all types of development, and areas that should be protected from development.

The principles underlying the LDP (i.e. the Vision, Aims, and Objectives) were derived from the Community Strategy, through the participation of key stakeholders. The principles of sustainable development and equalities underpin both the Community Strategy and the LDP.

**2. Who is the strategy for?**

The LDP directly affects all residents of the county borough, and many organisations and development agencies, through the land-use allocations made in the Plan.

### IMPACT ON THE PUBLIC AND STAFF

**3. Does the policy ensure that women and men, different racial groups, Welsh speakers and disabled people have an equal access to all the services available?**

The policies and proposals of the LDP apply to all groups and individuals in the county borough.

Efforts were made to secure the participation of all groups in the plan preparation process, for example, by ensuring that the Stakeholder Panel was fully representative.

These efforts were not always successful, because it proved difficult to secure the participation of some groups in the process: for example, young people, and Gypsies & Travellers.

**4. What are the indirect consequences of the strategy for particular groups?**

This is a difficult question to answer, because the policies and proposals in the LDP are very wide-ranging in their effects, and the particular groups referred to both unspecified and potentially very numerous. This perhaps is more relevant to individual Council policies, rather than Council strategies?

### INFORMATION COLLECTION

**5. Is full information and analysis of users of the strategy available?**

This perhaps relates more to the participation in the preparation of the LDP, rather than its content.

Demographic information was requested on all those wishing to be placed on the LDP Consultation Database, from which it is clear that the main characteristic of respondents is the unbalanced age structure, the young being noticeably under-represented.

One Group that proved difficult to engage in the plan preparation process was that of Gypsies & Travellers: it was not possible to identify any individual members of this Group to obtain their views, and organisations representing the Group were unwilling to become involved.

## **CONSULTATION**

### **6. What consultation has taken place?**

Extensive consultation has taken place to ensure that all views have been taken into account in the preparation of the Deposit LDP.

Full details, including a list of the organisations consulted in the preparation of the Plan, are contained in the Initial Consultation Report Appendix 1.

## **MONITORING & REVIEW**

### **7. How will the strategy be monitored?**

WAG Planning Guidance requires authorities to establish a Monitoring procedure, detailing Indicators and Targets to assess the progress of implementation of the LDP. The results will be reported in an Annual Monitoring Report on the LDP.

### **8. How will the strategy be evaluated?**

The LDP will be subject to review on a four-yearly cycle. This review will provide the opportunity to assess the implications of the Plan for particular Groups, and to modify the policies and proposals of the Plan to remedy any deficiencies.

### **9. Could it be done better next time?**

It is recognised that there are always improvements that could be made in both the Plan and the preparation process. It is hoped that the extensive documentation that exists on the preparation of the first Caerphilly LDP, together with the active involvement of the numerous participants and representors, will ensure that improvements are made in the First Review of the Plan.

# ANNEX 1 - REPRESENTATIONS ON THE PREFERRED STRATEGY

## ATODIAD 1 - SYLWADAU AR Y STRATEGAETH DDEWISOL



**INITIAL CONSULTATION REPORT  
ANNEX 1 REPRESENTATIONS ON THE PREFERRED STRATEGY  
CONTENTS**

<b>Ref</b>	<b>Reprentor</b>	<b>Page</b>
67	Mr & Mrs Moyle	3
458	Hengoed & Cefn Hengoed Partnership	10
513	Top Homes Ltd: Mr Amar Essa	12
697	Ashtenne Industrial Fund Ltd	13
876	Campaign for the Protection of Rural Wales	29
953	Mr Keith Johns	68
1056	Countryside Council for Wales	69
1086	Salem Methodist Church	101
1159	The Theatres Trust: Ms Rose Freeman Planning Assistant	102
1304	The Coal Authority	105
1382	Miss Yvonne Parfitt,	106
1392	Trethomas Conservation Society	108
1492	Home Builders Federation	110
1497	Cllr Judith Pritchard	124
1844	Miller Argent (South Wales) Limited	125
1883	White Young Green	136
2012	Caerphilly Greendoorstep	138
2049	RE Phillips & Partners:	142
2193	Gwent Healthcare NHS Trust, C/O DTZ Planning	167
2194	Hunt, Mr Peter	185
2282	Welsh Assembly Government	186
2431	Thomas, Mr Haydn	244
2435	Garran Lockers Ltd:	245
2436	Duvan Management Ltd:	252

2443	Mssrs B & J John & Jones	259
2500	Mr Tim Ross	261
2516	Wilthsire, Mrs Rowene	262
2525	Mr & Mrs K & M Hassall	263
2532	Dowlais Top Investment Company Limited	264
2533	Cardiff County Council	266
2604	National Grid:	270
2607	Redrow Homes:	272
2611	Mrs Carolyn Saunders	276
2612	Mr Geoffrey Holder	277
2618	Mr Gwyn Chivers	279
2623	Mr Mark Barry	282
2624	Merriman Ltd:	295
2632	GB Engineering Ltd:	296
2712	Trustees of Joseph Thomas Davies (Deceased)	300
2713	Barratt Homes South Wales Ltd:	311

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

In the Preferred Strategy Paragraph 6.37-6.39, it should be made more explicit that planning obligations will only be sought where they contribute towards the mitigation of development impacts and meet the test of the Planning Circular 13/97, and are not a more general source of local authority revenue raising. It should be recognised that flexibility will be required over the level of planning obligation that will be sought from the development of a brownfield site. Indeed, obligations should be adjusted to take account of high levels of abnormal development costs which could render a development uneconomic.

The Preferred Strategy should be more explicit in relation to planning obligations, with text amended to explain that planning obligations will only be sought if they meet the test of Planning Circular 13/97.

---

### **Council Analysis**

The representation is that the Plan should be more explicit in relation to planning obligations, and explain that planning obligations will only be sought if they meet the test of Planning Circular 13/97.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to identify the relevant Guidance within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

We support the preferred strategy which seeks to provide a hybrid approach to growth, allowing for a development approach which is tailored to the needs of the various elements of the County. The importance of the south of the County and connections to Cardiff to the economic performance of the whole Borough should be reflected when detailed allocations are made.

---

### **Council Analysis**

The representation supports the aim of the Preferred Strategy to achieve appropriate development in all parts of the county borough, but wishes to ensure that the selection of sites to be allocated for development in the LDP should reflect the importance of the south of the County and connections to Cardiff to the economic performance of Caerphilly.

These points are in line with the Council's policy as set out in Caerphilly: The Smart Alternative, and have been fully recognised in the site allocation process for the Deposit LDP.

---

### **Council Response**

The Deposit LDP takes into account the concern of the representor on the importance of the south of the County and connections to Cardiff to the economic performance of Caerphilly.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 9

**Page:** 040

---

### **Representation**

We request that an additional point is added to Policy SP9 which states "the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development".

---

### **Council Analysis**

The representation is that the policy in the Plan on planning obligations should state that the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development.

The planning obligations that the Council will seek to secure from developments will obviously always have regard to the economic viability of the development, and it is not considered either necessary or helpful to make this point within the Plan.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

We note the requirement for 9,500 new residential dwellings to 2021 which has been derived from the "provisional apportionment exercise" undertaken at the regional level. We also understand that this work has yet to undergo independent scrutiny or examination. The requirement will therefore need to be properly justified and tested in due course having regard to the advice in Planning Policy Wales (para 9.22). The Council appears to be planning for net in-migration over the plan period, which is a positive approach and is welcomed. However to properly reflect the way in which the Plan intends to embrace growth the expression of the housing requirement as a "maximum" should be replaced with "at least". The figure of 9,500 should not be seen as a ceiling, rather a floor which can be exceeded if sustainable locations for new housing can be achieved. Moreover, a flexibility allowance of 10% should also be included as a safeguard should brownfield sites not be delivered at the foreseen rate.

Request that the wording of Policy SP06 (2) is amended to "at least 9,500" dwellings, along with a flexibility allowance of 10% as a safeguard should brownfield sites not be delivered at the foreseen rate.

---

### **Council Analysis**

---

### **Council Response**

**Document:** LDP Strategy  
**Paragraph:** 6.25-6.33

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

We support the reuse of brownfield opportunities where appropriate and the designation of settlement boundaries. Indeed, where existing employment land and premises are not considered to be suitable to meet the long term requirements of modern businesses and are sustainably located within settlement boundaries then alternative uses should be sought. Moreover, innovative, mixed use approaches to development should be found, particularly on brownfield sites which may have economic viability problems. The locational context of brownfield sites must also be considered, and in particular adjacent uses and proximity to major public transport routes.

---

### **Council Analysis**

Some of the employment land allocated in the UDP will be deallocated, precisely because its viability for other uses is deemed to be greater. Policy CW2 will encourage developers to enter into Green Travel Plans, in order to bring about an increase in the accessibility of employment sites and thereby enhance their viability.

---

### **Council Response**

No change to be made.

**Representation**

We note that the Employment Topic Paper indicates that the future employment land requirement will be based upon the Atkins Study on Employment Sites Supply and Market Appraisal(2006). Our understanding of this report is that it identifies a significant oversupply of employment land compared with a limited future land requirement for growth to 2016. In taking this forward to a more detailed level it is important that a full and comprehensive review of both existing allocations and underused employment

stock is undertaken. We note that there are numerous existing problems within Caerphilly, most notably the high instance of out - commuting from the County to other areas, particularly along the M4 corridor. In order to reverse this unsustainable trend, the County will need a high quality and competitive stock of employment land which meets the requirements of modern occupiers.

Furthermore, any review of employment land should be based on the sustainability principles which are inherent within the LDP preferred strategy in order to promote a balanced disposition of land uses linked into existing land use patterns and sustainable transport infrastructure improvements.

We request that future land requirements should be tailored according to particular sectoral forecasts. HM Treasury forecasts indicate that Office based

Employment is forecast to be the largest growth sector in the future. Offices can be developed at a much higher density than industrial sites. This requirement will have an impact upon future land requirements since developing an office building at 40% of the site area can accommodate around 400 jobs per ha as

opposed to the assumption of 50 per ha across the board in the UDP. Moreover, it is likely that a significant amount of job growth will be within non B uses as such consideration should be given to the contribution of retail and service sector contributions towards job growth. Taken together these characteristics suggest a need to review existing low grade employment sites so as to identify suitable redevelopment opportunities as exists at Twycynnydd Industrial Estate.

---

**Council Analysis**

Some sites allocated and protected for employment development within the UDP have been left as 'white' land in the LDP in an effort to rationalise the portfolio of employment land, given the projected requirement over the plan period. However, in order to foster the growth of a healthy and diverse local economy, it is necessary to retain a relatively significant supply of allocated and protected land as proposed by the LDP. This will consist of a mix of large and small sites intended for varying ranges of use classes (business parks, primary sites and secondary sites) spread across the three strategy areas. Permitting sui generis uses where appropriate will complement the overall employment 'offer'.

---

**Council Response**

No change required.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

In general we support the Local Development Plan Vision Statement, and note that the strategy must be delivered in relation to the respective roles and function of each individual settlement. The four key themes seem to be limited in light of the Vision Statement which requires the strategy to reflect the key roles and function of each settlement. We would suggest that these four themes need to be expanded in order to cover all the elements of a successful community including housing, retail, leisure and employment.

---

### **Council Analysis**

The representation refers to the four themes of the Council's Community Strategy. It is not the role nor the remit of the LDP to amend another key strategy document of the Council. Nevertheless, the four themes of the Community Strategy taken together are fully representative of all aspects of community life and protection of the environment, including matters which the LDP as a land use document cannot address.

---

### **Council Response**

As explained in the analysis the representation is not relevant to the LDP itself. Changes to the reference in the LDP strategy to the Community Strategy's basis is not possible.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Use all brownfield sites, and not the little that is left of the greenfield sites

---

### **Council Analysis**

One of the key components of the LDP Strategy is to "exploit brownfield opportunities where appropriate." Sites submitted for consideration for their suitability for inclusion as allocations within the Deposit Plan have been subject to rigorous assessments, including consideration of whether the land is brownfield or greenfield, with brownfield sites being considered more favourably. In taking sites forward for allocation in the Deposit LDP, brownfield sites that are considered acceptable for development have been allocated in preference to greenfield sites. However, in some settlements, greenfield sites have been released where there are no suitable brownfield alternatives and where development would be necessary to address other components of the plan, including the targetting of development to the role and function of settlements in order to sustain them as viable communities.

---

### **Council Response**

This issue has been fully incorporated in both the LDP Strategy and the site selection process.

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

I would like to keep the communities separate as there are not enough green spaces or play areas for children and there would be more traffic on an already overstretched road.

---

### **Council Analysis**

In response to significant development pressure in the Northern Connections Corridor and the LDP green wedge assessments, a green wedge has been designated around the settlements of Hengoed and Cefn Hengoed to prevent the coalescence of the two settlements. The green wedge also prevents the coalescence of both Hengoed and Cefn Hengoed with the other settlements in close proximity, Ystrad Mynach, Tir y Berth, Penpedairheol and Fleur de Lys for example. No green wedge has been designated within settlement boundaries as this goes against both the settlement boundary and green wedge policy objectives and remit.

---

### **Council Response**

The Representation has been noted and a green wedge has been designated around the settlements of Hengoed and Cefn Hengoed to prevent coalescence and protect the integrity of the individual settlements.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Top Homes Ltd currently operates and builds residential homes for the public in the Caerphilly Valley towns. In recent months, we have struggled to find residential sites to purchase, thus making it difficult for us to maintain our working force and triggering a few redundancies.

I strongly urge the planning committee to release more residential sites and employment sites around Senghenydd and Abertridwr.

---

### **Council Analysis**

The LDP Strategy identifies component parts that will seek to inform the allocation of land within the Deposit LDP. The LDP Strategy aims to target development to reflect the role and functions of individual settlements and promote a balanced approach to managing future growth. The Aber Valley settlements of Abertridwr and Senghenydd are both identified as being primarily residential settlements and it has been appropriate to target development to reflect this role by allocating sites in the Aber Valley.

---

### **Council Response**

This representation has been addressed through the allocation of housing sites in the Aber Valley

**Document:** LDP Strategy  
**Paragraph:** 6.64

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

As acknowledged in Paragraph 6.64, Ystrad Mynach is well served in terms of the transportation network, being located along the main Rhymney to Cardiff railway line and it is strategically located at the intersection of the A469 and A472 road corridors.

---

**Council Analysis**

The representation notes that Ystrad Mynach is well served in terms of both rail and road links.

---

**Council Response**

The comment is noted.

**Document:** LDP Strategy  
**Paragraph:** 6.25

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

We support Paragraph 6.25 which acknowledges that the County Borough has significant areas of brownfield land available for redevelopment, including in Ystrad Mynach in the northern Connection Corridor.

---

### **Council Analysis**

The representation supports statements in the Preferred Strategy that the County Borough has significant areas of brownfield land available for redevelopment, including in Ystrad Mynach in the northern Connection Corridor.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.27

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

We support Paragraph 6.27 which recognises that the diversification of the economy offers the opportunity to utilise other brownfield sites including industrial sites that are no longer required to accommodate their existing use for alternative land uses. This is in accordance with Paragraph 9.2.6 of Planning Policy Wales which states that local authorities should consider the contribution that disused or underused buildings can make to the overall provision of land for housing and that sites no longer likely to be needed for industrial purposes may also be appropriate for housing.

---

### **Council Analysis**

The representation supports the Preferred Strategy's aim to allocate brownfield sites (including industrial sites) that are no longer required for their existing use for alternative land uses.

As the representor note, this is in line with WAG Planning Guidance.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.29

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

We support Paragraph 6.29 which states that a key mechanism for achieving resource efficient settlements and to indicate where growth will be permitted is the designation of settlement boundaries. We agree that it promotes the full and effective use of urban land and thus concentrates development within settlements and prevents inappropriate development in the countryside.

---

### **Council Analysis**

The representation supports the designation of settlement boundaries in order to achieve resource efficient settlements.

The designation of settlement boundaries is a key policy mechanism in the Deposit LDP.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.31

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

We support Paragraph 6.31 which states that all land allocations within existing settlement boundaries will be rigorously reassessed with a view to reallocating land where appropriate, for alternative uses. We concur that where land is identified as being surplus to requirements and its development would result in the efficient use of land within settlement limits it will be released for alternative forms of development.

---

**Council Analysis**

The representation supports the Council's intention to rigorously reassess all land allocations within existing settlement boundaries with a view to reallocating land where appropriate for alternative uses.

---

**Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.99

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

We support Paragraph 6.99 which states that major housing growth will be concentrated in the settlements with good public transport facilities and those with access to a railway station and that the Mid Valleys Conurbation, which includes Ystrad Mynach, should play a central role in the regeneration of the Valleys due to its strategic location and its critical mass. Furthermore, the countryside will be protected.

---

### **Council Analysis**

The representation supports the Preferred Strategy's aim of concentrating major housing growth in those settlements with good public transport (in particular rail) facilities. It also supports the identification of the Mid Valleys Conurbation (which includes Ystrad Mynach) as playing a central role in the regeneration of the Valleys due to its strategic location and its critical mass, where the concentration of development will also help to protect the countryside.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 1

**Page:** 039

---

### **Representation**

We support the proposed Sustainable Development Strategy Policy SP1 which sets out the criteria for identifying land for development and, in particular, criterion 6 which explicitly refers to the need to exploit brownfield opportunities wherever appropriate and possible.

---

### **Council Analysis**

The representation supports the proposed Sustainable Development Strategy Policy SP1 in the Preferred Strategy, which sets out the criteria for identifying land for development in the Plan.

The policy is not included within the Deposit LDP in the same form, but several of the criteria of the policy are included in the Strategy Policies of the Plan, and the criteria have provided the basis for the selection of the land allocations in the Plan.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 3

**Page:** 039

---

### **Representation**

We object to the proposed Protection Policy SP3 which refers to areas which will be protected from inappropriate development.

We object, in particular, to the wording of Criterion 4 which refers to: "Employment land and buildings where the employment land bank is threatened."

We suggest Criterion 4 be amended to: "Land and buildings which are necessary for strategic employment purposes where the employment land bank may be threatened."

---

### **Council Analysis**

The Preferred Strategy contains a Strategic Policy (SP3 Protection Policy), which identified four areas that would be protected from development, including the one objected to in this representation, i.e. employment land and buildings where the employment land bank is threatened. The representation seeks to restrict this protection to land and buildings which are necessary for strategic employment purposes.

The Deposit LDP does not contain a Strategy Policy that has the aims of the Preferred Strategy Strategic Policy SP3. However, the Council considers that the successful implementation of the Plan requires the protection of identified employment sites, including non-strategic employment sites. The Deposit LDP therefore contains three Area Specific Policies which identify employment sites that are to be protected.

---

### **Council Response**

The Strategic Policy in the Preferred Strategy objected to in this representation is not included in the Deposit LDP. However, the Council considers that the successful implementation of the Plan requires the protection of identified employment sites, including non-strategic employment sites, and so the Deposit LDP does contain Area Specific Policies that carry out the function of this Strategic Policy by protecting these sites.

**Document:** LDP Strategy  
**Paragraph:** 8.1

**Section:** 8  
**Policy:**

**Page:**

---

### **Representation**

We support Paragraph 8.1 which again recognises that it will be necessary to undertake a comprehensive re-assessment of sites that do not have the benefit of planning consent. We firmly believe that the new LDP process provides the ideal opportunity to review the brownfield opportunities available and reduce the need for new greenfield land to be developed.

---

### **Council Analysis**

The representation supports the Council's intention to undertake a comprehensive re-assessment of sites that do not have the benefit of planning consent, particularly because it provides the opportunity to review the brownfield land that is available and reduce the need for new greenfield land to be developed.

As noted in the Preferred Strategy document, the Council invited individuals and organisations to submit Candidate Sites for consideration, and as a result approximately six hundred sites were assessed to determine their suitability for a variety of land uses. The identification of sites with development potential is an integral part of the Evidence Base for the LDP.

---

### **Council Response**

This support is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 2  
**Policy:**

**Page:**

---

### **Representation**

The town and country planning system seeks to ensure that the most sustainable use is made of limited resources. Paragraph 2.16 indicates that the long-standing trend of out-migration from the County Borough appears to have been halted. However, in order to ensure that this position of migration balance can be maintained throughout the plan period, there will be a need to achieve a higher house building rate.

The South East Wales Strategic Planning Group (SEWSPG) has agreed overall household and population projections and the apportionment of these projections for each local authority in the region. We understand that the work undertaken by SEWSPG suggests that the rate of dwelling completions in the County Borough of Caerphilly will need to increase by 16% between 2006 and 2021 (as compared to the 1991-2005 period). We therefore support Paragraph 2.18 which identifies the need to allocate land to accommodate 9,500 dwellings over the plan period. This reflects the higher growth anticipated in the County Borough but will require a house building rate of 650 dwellings per annum which is much higher than the average rate of 500 dwellings per annum over the past 10 years. High demand has inflated house prices.

There is therefore a need to increase and accelerate the provision of housing over the plan period to ensure an adequate choice and mix of housing, concentrated at the most sustainable locations. Indeed, we consider that higher rates of housing may be desirable and possible, especially in the southern parts of the Borough.

---

### **Council Analysis**

The Preferred Strategy identified a range of possible future housing growth in the county borough over the Plan period: the representation proposes that the higher figure of this range should be considered as the minimum for which the Plan should make provision.

The Council considers that the levels of net in-migration implied by the higher figure are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The full justification for this decision is given in the Background Paper on Population & Housing (see Section 4).

---

### **Council Response**

The Council does not agree with the proposal in the representation for the scale of housing provision in the Plan.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:**

---

### **Representation**

We support the Local Development Plan Vision Statement, as set out in Paragraph 5.4, which will seek to regenerate the towns, villages and employment centres in a sustainable manner. We support the growth and development within the County Borough and agree that it should be planned for and managed positively to create and maintain sustainable communities, particularly by linking the provision of homes, jobs and services based on role and function so that towns and villages and groups of places have the potential to become more self contained and the need for travel is reduced.

---

### **Council Analysis**

The representation supports the LDP Vision Statement.

---

### **Council Response**

The support for the LDP Vision Statement is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:**

---

### **Representation**

We consider that there should be stronger statements based on Caerphilly and Ystrad Mynach's relationship with Cardiff.

---

### **Council Analysis**

The Vision statement states that Caerphilly County Borough is at the centre of the Capital Network Region, this refers to the terminology used in the Wales Spatial Plan which in essence describes the major centres (Cardiff and Newport) and the M4 corridor. It is considered unnecessary to go further in description when the description of the concept in the Wales Spatial Plan is clearly sufficient.

---

### **Council Response**

The vision is considered to be sufficiently clear with regard to the relationship of Cardiff to our individual settlements.

**Document:** LDP Strategy  
**Paragraph:** 6.4

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

On the face of it, the preferred strategy is sensible. The Assembly Government is committed to promoting sustainable development and maximising the re-use of previously developed land. In line with national planning policy guidance, in the form of Planning Policy Wales, we support Paragraph 6.4 which acknowledges the priority to be given to previously developed land within urban areas and the need to reduce the impact of development upon the countryside.

---

### **Council Analysis**

The representation supports the Preferred Strategy's aims of seeking to concentrate development on brownfield land and to protect the countryside.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.13

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

We support Paragraph 6.13 which identifies Ystrad Mynach as a Principal Town in the County Borough and which, together with Blackwood and Bargoed, forms the Mid Valleys conurbation.

---

**Council Analysis**

The representation supports the designation of Ystrad Mynach as a Principal Town in the County Borough, and as part of the Mid Valleys conurbation.

---

**Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.18

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

We support Paragraph 6.18 which stipulates that the Preferred Strategy will seek to exploit development opportunities in the northern part of the County Borough, which includes the Principal Town of Ystrad Mynach.

---

**Council Analysis**

The representation supports the aim of the Preferred Strategy to exploit development opportunities in the northern part of the County Borough, which includes the Principal Town of Ystrad Mynach.

---

**Council Response**

No further action to be taken, representor is in support of paragraph 6.18

**Document:** LDP Strategy  
**Paragraph:** 6.23

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

We support Paragraph 6.23 which indicates that residential development opportunities will be targeted at settlements with good rail and bus services. This is a sensible approach.

---

**Council Analysis**

The representation supports the Preferred Strategy's aim of targeting residential development opportunities in settlements with good public transport.

---

**Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.26

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

CPRW endorses the final sentence thinking as to the need to avoid jeopardising needed development in principal towns or key settlements by using brownfield sites in the Southern Connections Corridor for housing. This said, greenfield development must be resisted unless there is exemplary reason for it - that no suitable land for redevelopment is available as an alternative.

---

### **Council Analysis**

The representation supports the intention of the Preferred Strategy to resist the development of brownfield sites for housing within the Southern Connections Corridor where their development will undermine the role and function of Principal Towns or Key Settlements where there is a need to reserve land for employment or urban facilities, but notes that greenfield development must be resisted unless no suitable land for redevelopment is available as an alternative.

---

### **Council Response**

The comment is noted.

**Document:** LDP Strategy  
**Paragraph:** 6.29

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

CPRW is pleased to note that settlement boundaries continue to be considered as important development control tools - though is unfavourably inclined toward the wording of proposed Policy SPI (page 39 of the draft): "DEVELOPMENT ...'ADJACENT' (respondent emphasis) TO EXISTING TOWNS AND VILLAGES".

---

### **Council Analysis**

The representation is concerned with the use of the word "adjacent" in the Strategic Policy SP1 Sustainable Development Strategy, which asserts that the Plan identifies land for development within and adjacent to existing towns and villages subject to certain criteria.

Some of the criteria in this policy are included in the Strategy Policies of the Deposit LDP, but the policy itself is not replicated in the Deposit LDP.

---

### **Council Response**

The comment is noted.

**Document:** LDP Strategy  
**Paragraph:** 6.30

**Section:** 6  
**Policy:**

**Page:** 026

---

### **Representation**

The LDP will need to include a clear explanation of the "different approaches to settlement boundary delineation"; otherwise, there will be the risk that these will be challenged on grounds of inequity between zones.

---

### **Council Analysis**

Settlement boundaries were amended from those contained within the UDP in accordance with a series of criteria drawn up to undertake their review. One of these was that "inclusion of land within the settlement boundary would adhere to the objectives of the strategy area". Reading the criteria (as contained within the Candidate Sites Assessment Methodology) in conjunction with the objectives of each strategy area should make the "different approaches to settlement boundary delineation" clear.

---

### **Council Response**

The Candidate Sites Assessment Methodology will set out the approach taken with regard to settlement boundary delineation in each of the three plan strategy areas. No change will be required.

**Document:** LDP Strategy  
**Paragraph:** 6.31

**Section:** 6  
**Policy:**

**Page:** 026

---

### **Representation**

CPRW agrees that sufficient land for open space must be retained in all new housing developments, especially where house-building will lead to loss of informal open space that has been of value to the community (page 27, paragraph 6.38, 2nd sentence refers).

---

### **Council Analysis**

The representation supports the aim of the Preferred Strategy to ensure that sufficient land for open space is secured in all new housing developments, and notes that this is particularly important where house-building will lead to the loss of informal open space that has been of value to the community

---

### **Council Response**

The comment is noted.

**Document:** LDP Strategy  
**Paragraph:** 6.32

**Section:** 6  
**Policy:**

**Page:** 026

---

### **Representation**

Re Paragraph 6.32, last two sentences:

There is too great a tendency to presume in favour of flood plain development if mitigation is "possible", rather than taking a more robust presumption against development in flood risk areas. The final sentence makes an acceptable point.

---

### **Council Analysis**

The representation is concerned with the approach to development in the flood plain, identifying that development should be planned to provide increased protection for existing vulnerable areas in all situations, not just 'where possible'. The precautionary approach to development in the flood plain has been adopted in the LDP, as set out in the Broad Level Assessment. Consequently, the majority of sites located within the flood plain have not been taken forward as allocations, and where they have, this is where it has been demonstrated that the consequences of flooding can be acceptably managed and/or the development of the site is important for wider regeneration objectives.

However, it should be noted that due to the topography of the land, a significant proportion of existing settlements, including parts of the principal towns of Caerphilly, Ystrad Mynach and Risca, lie within flood risk areas. Whilst every effort will be made to minimise the risk of flooding, it is inevitable that some areas will be at risk due to their location within the flood plain and therefore the inclusion of the statement 'where possible' is necessary to reflect this. A full explanation of this is provided in the LDP Strategy section under the key component of 'promoting resource efficient settlements.'

---

### **Council Response**

No change be made to the plan in respect of this representation

---

**Document:** LDP Strategy  
**Paragraph:** 6.34

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

Bus transport as well as rail travel detail should be included. Buses should be regarded as a key form of people transportation.

It is good to see recognition given to "identification of sites for new development" in proximity to key (public) transport nodes.

---

### **Council Analysis**

The Council agrees that buses are a key component of public transport.

The deposit local development plan makes reference to 'public transport' rather than differentiating between bus and rail travel in its strategy section and through its policies.

The strategy policies refer to targeting settlements with good public transport networks, making improvements to existing transport infrastructure and encourage the use of public transport over the use of the private vehicle.

The countywide policies also make reference to 'public transport'.

The allocation policies do however, make specific reference to rail provisions and not bus provisions. The deposit local development plan is able to identify the strategic locations for improved access to the rail infrastructure. The omission of a reference to the provision of improved bus services is not considered detrimental to the aims and objectives of delivering sustainable transport through the local development plan, and the exclusion of a reference to buses is deliberate. It is difficult for the council to pre-empt the exact provision, requirements of bus services until new developments are completed. Bus services are seen as an essential mechanism in delivering the sustainable transport agenda set out in the local development plan and the plan will seek to integrate all forms of public transport into all developments.

---

### **Council Response**

The Council agrees that buses are a key component of public transport. The deposit local development plan makes reference to 'public transport' rather than differentiating between bus and rail travel in its strategy section and through its policies. The deposit local development plan is able to identify the strategic locations for improved access to the rail infrastructure through its allocation policies. The omission of a reference to the provision of improved bus services is not considered detrimental to the aims and objectives of delivering sustainable transport through the local development plan, and the exclusion of a reference to buses is deliberate. It is difficult for the council to pre-empt the exact provision, requirements of bus services until new developments are completed. Bus services are seen as an essential mechanism in delivering the sustainable transport agenda set out in the local development plan and the plan will seek to integrate all forms of public transport into all developments.

**Document:** LDP Strategy  
**Paragraph:** 6.35

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

CPRW is of the view that "public transport friendly development opportunities" should generally take precedence over provision of Park & Ride sites, the former being more sustainable by discouraging car travel, even for part journeys.

---

### **Council Analysis**

The council note the representation and accept that the public transport friendly development opportunities should take precedence over other modes of transport. The provision of Park & Ride sites are however, just one method for encouraging sustainable transport and discouraging car travel, even if it is just for part of a journey. The deposit local development plan addresses in depth through its aims, objectives, strategy, countywide and allocation policies sustainable transport and infrastructure, and seeks to ensure the most sustainable options, including public transport, walking and cycling are provided for above private car use.

---

### **Council Response**

The council note the representation and accept that the public transport friendly development opportunities should take precedence over other modes of transport. The provision of Park & Ride sites are however, just one method for encouraging sustainable transport and discouraging car travel, even if it is just for part of a journey. The deposit local development plan addresses in depth through its aims, objectives, strategy, countywide and allocation policies sustainable transport and infrastructure, and seeks to ensure the most sustainable options, including public transport, walking and cycling are provided for above private car use.

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

**Representation**

CPRW is critical of the wording of this sentence.

---

**Council Analysis**

The sentence referred to in the representation has been removed from the deposit local development plan.

---

**Council Response**

The sentence referred to in the representation has been removed from the deposit local development plan.

**Document:** LDP Strategy  
**Paragraph:** 6.40

**Section:** 6  
**Policy:**

**Page:** 028

---

### **Representation**

In the first sentence of Paragraph 6.40, the lack of reference to Green Wedges is very surprising, given that this most important anti-coalescence designation is included in APPENDICES SECTION 9.

---

### **Council Analysis**

The Council considers that as a result of development patterns and pressure there is a need to define and maintain both open spaces within urban areas and between settlements. The green wedge policy seeks primarily to prevent coalescence and to prevent any further development that would be detrimental to the integrity of the individual settlements.

The representation is concerned with the omission of reference to Green Wedges in Paragraph 6.40. Area based green wedge allocation policies for each of the strategy areas have been included within the Deposit Local Deveolopment Plan, which seek to prevent the coalescence within and between settlements.

---

### **Council Response**

The Deposit LDP includes area based green wedge allocation policies for each of the strategy areas, which seek to prevent the coalescence within and between settlements.

**Document:** LDP Strategy  
**Paragraph:** 6.40

**Section:** 6  
**Policy:**

**Page:** 028

---

### **Representation**

In the 3rd sentence of Paragraph 6.41, more than "consideration" needs to be given to "landscape enhancement [where needed] and biodiversity gain" when greenfield land is developed. It should be an inescapable commitment.

This also applies to green corridors in the 4th sentence of paragraph 6.41.

---

### **Council Analysis**

The council is committed to protecting and enhancing the natural heritage of the county borough, including landscape and biodiversity features, as part of both greenfield and brownfield developments.

In response, an overarching strategic policy has been included within the deposit local development plan that seeks to protect, maintain, enhance and positively manage the natural heritage of the county borough through the consideration of all development proposals within both the rural and built environment. A county wide policy has also been included within the plan which seeks specifically to provide opportunities for the provision of biodiversity and landscape enhancements as part of general design considerations associated with development proposals.

---

### **Council Response**

The council is committed to protecting and enhancing the natural heritage of the county borough through the development system. An overarching strategic policy and a county wide policy have both been included within the deposit local development plan seeking to protect, enhance and provide opportunities for landscape and biodiversity enhancements as part of all brownfield and greenfield developments.

**Document:** LDP Strategy  
**Paragraph:** 6.42

**Section:** 6  
**Policy:**

**Page:** 028

---

### **Representation**

CPRW applauds the reasoning in the 3rd sentence of Paragraph 6.42 as to damage to landscape from wind generated energy.

Rewording that avoids inclusion of the word "balance" (4th sentence) is suggested below.

---

### **Council Analysis**

The sentence that is the subject of this representation has been included within Section A: Development Strategy of the draft local development plan. The sentence has not been amended as suggested and the term "Balance" has been retained within the deposit local development plan. The term "balance" directly relates to the aims and objectives of the plan and is a broad statement that seeks to realise the councils commitment to renewable energy whilst protecting the unique natural heritage. The strategic policies and countywide policies seek to address in further detail the impact of renewable energy proposals and development on the landscape and on sites of ecological interest, and ensure that all aspects of development are fully taken into account.

---

### **Council Response**

The term "Balance" has been retained within the deposit local development plan. The term "balance" directly relates to the aims and objectives of the plan and is a broad statement that seeks to realise the councils commitment to renewable energy whilst protecting the unique natural heritage. The strategic and countywide policies seek to address in further detail the impact of renewable energy proposals and development on the landscape and on sites of ecological interest, and ensure that all aspects of development are fully taken into account.

---

**Document:** LDP Strategy  
**Paragraph:** 6.49

**Section:** 6  
**Policy:**

**Page:** 029

---

### **Representation**

In the final sentence of Paragraph 6.49, no reference is made to public transport other than rail, nor is it mentioned in paragraphs 6.51 and 6.52 in relation to improvements to the "road network".

---

### **Council Analysis**

The Council agrees that buses are a key component of the public transport provision for the county borough.

The deposit local development plan makes reference to 'public transport' rather than differentiating between bus and rail travel in its strategy section and through its policies.

The strategy policies refer to targeting settlements with good public transport networks, making improvements to existing transport infrastructure and encourage the use of public transport over the use of the private vehicle. The countywide policies also make reference to 'public transport'.

The strategy areas and allocation policies do however, make specific reference to rail provisions and not bus provisions. The deposit local development plan is able to identify the strategic locations for improved access to the rail infrastructure. The omission of a reference to the provision of improved bus services is not considered detrimental to the aims and objectives of delivering sustainable transport through the local development plan, and the exclusion of a reference to buses is deliberate. It is difficult for the council to pre-empt the exact provision, requirements of bus services until new developments are completed. Bus services are seen as an essential mechanism in delivering the sustainable transport agenda set out in the local development plan and the plan will seek to integrate all forms of public transport into all developments.

---

### **Council Response**

The Council agrees that buses are a key component of public transport. The deposit local development plan makes reference to 'public transport' rather than differentiating between bus and rail travel in its strategy section and through its policies. The deposit local development plan is able to identify the strategic locations for improved access to the rail infrastructure through its strategy areas and allocation policies. The omission of a reference to the provision of improved bus services is not considered detrimental to the aims and objectives of delivering sustainable transport through the local development plan, and the exclusion of a reference to buses is deliberate. It is difficult for the council to pre-empt the exact provision, requirements of bus services until new developments are completed. Bus services are seen as an essential mechanism in delivering the sustainable transport agenda set out in the local development plan and the plan will seek to integrate all forms of public transport into all developments.

**Document:** LDP Strategy  
**Paragraph:** 6.53

**Section:** 6  
**Policy:**

**Page:** 030

---

### **Representation**

In Paragraph 6.53, 2nd sentence, CPRW would like to see the word "balance" removed from the text. In Paragraph 6.53, final sentence, it is good to see recognition given to the need to protect the amenity of residents from the effects of minerals extraction - this is even more important than the influence of energy generation on "tourism development potential" - local people have to live constantly with lack of amenity.

---

### **Council Analysis**

The sentence that is the subject of this representation and the recommended rephrasing of the sentence has been included within the deposit local development plan.

---

### **Council Response**

The sentence that is the subject of this representation and the recommended rephrasing of the sentence has been included within the deposit local development plan.

**Document:** LDP Strategy  
**Paragraph:** 6.63

**Section:** 6  
**Policy:**

**Page:** 032

---

### **Representation**

While it is highly desirable for Heads of the Valleys residents to access work, leisure, and cultural services in the Mid Valleys area, it is not very sustainable to encourage them to travel the greater distance to such services in the far south of the county borough.

---

### **Council Analysis**

The representation is that Heads of the Valleys residents should not be encouraged to access work, leisure, and cultural services by travelling to the far south of the county borough, on the grounds of sustainability. However, the paragraph to which the representation refers to are actually the settlements of Ystrad Mynach and Blackwood and the strategy area of the Northern Connections Corridor.

The strategy area of the Northern Connections Corridor and particularly the key settlements of Ystrad Mynach and Blackwood, are well served by the existing public transport and infrastructure network. As such, these settlements have the potential to connect the most deprived parts of the County Borough in the north with economic, leisure and cultural opportunities offered in the Mid Valleys area and to the existing opportunities in the south of the County Borough and beyond. The council are not seeking to prevent settlements or strategy areas from becoming stagnant and will seek in the first instance to always encourage sustainable forms of transport modes rather than the private car as part of any development proposal.

---

### **Council Response**

The representation is that Heads of the Valleys residents should not be encouraged to access work, leisure, and cultural services by travelling to the far south of the county borough, on the grounds of sustainability. However, the paragraph to which the representation refers to are actually the settlements of Ystrad Mynach and Blackwood and the strategy area of the Northern Connections Corridor.

The key settlements of Ystrad Mynach and Blackwood, are well served by the existing public transport and infrastructure network. As such, these settlements have the potential to connect the most deprived parts of the County Borough in the north with economic, leisure and cultural opportunities offered in the Mid Valleys area and to the existing opportunities in the south of the County Borough and beyond. The council are not seeking to prevent settlements or strategy areas from becoming stagnant and will seek in the first instance to always encourage sustainable forms of transport modes rather than the private car as part of any development proposal.

**Document:** LDP Strategy  
**Paragraph:** 6.66

**Section:** 6  
**Policy:**

**Page:** 032

---

### **Representation**

In Paragraph 6.66, 2nd sentence, it is noted that no mention is made of good public transport links between Oakdale Business Park and Blackwood, either existing or proposed. Bus services will be important in assisting businesses to instigate Green Travel Plans.

---

### **Council Analysis**

The representation notes that there is no mention of good public transport links between Oakdale Business Park and Blackwood, either existing or proposed.

The Council recognises the importance of public transport in the promotion of sustainable development in the county borough, and this is fully reflected in the proposals in the Plan. However, the public transport links to Oakdale will necessarily be by bus, which are inherently flexible and do not require investment in specific infrastructure, which accounts for the lack of need for systematic reference to them.

---

### **Council Response**

The comment is noted.

**Document:** LDP Strategy  
**Paragraph:** 6.72

**Section:** 6  
**Policy:**

**Page:** 033

---

### **Representation**

CPRW thinks that reference should be made to the aggregates safeguarded area in Nelson's hinterland as having a potential impact upon tourism development and local scenic quality (Site 8C on page 23 in APPENDIX SECTION 3).

---

### **Council Analysis**

The representation is that reference should be made to the potential impact of the aggregates safeguarded area in Nelson's hinterland upon tourism development and local scenic quality.

It is not considered that the potential impact on tourism development and local scenic quality of an aggregates safeguarded area in the vicinity is sufficient to justify the inclusion of such a statement (notwithstanding the reference to a similar issue in Paragraph 2.29).

---

### **Council Response**

That no change be made to the plan in respect of this representation.

**Document:** LDP Strategy  
**Paragraph:** 6.80

**Section:** 6  
**Policy:**

**Page:** 034

---

**Representation**

It is agreed that there will be a need for increased frequency of trains on the Ebbw Valley line - in the fairly near future, it is to be hoped.

---

**Council Analysis**

The representation supports the Council's view on the need for increased frequency of trains on the Ebbw Valley line.

---

**Council Response**

The comment is welcomed and noted.

**Document:** LDP Strategy  
**Paragraph:** 6.97

**Section:** 6  
**Policy:**

**Page:** 036

---

### **Representation**

With regard to road links, no specific mention is made of public transport. If it is currently deficient, improvement should be a priority, especially in view of the substantial commuter movement referred to.

There is no more virtue in encouraging massive commuter flows (by car) to the Caerphilly Basin from the Rhymney area than there is in promoting travel from north to south of the county borough for leisure purposes (see comment upon paragraph 6.63 above).

---

### **Council Analysis**

The representation is that in Paragraph 6.97 attention should be drawn to bus services through the Caerphilly Basin area.

Paragraph 6.97 is concerned with the proximity of Cardiff to the county borough, and the importance of rail and road links to Cardiff to take advantage of the resulting opportunities. Buses are implicitly included, in that they use roads, and it is not considered helpful to make the reference explicit here because of their present and future limited role in commuter travel.

---

### **Council Response**

That no change be made to the plan in respect of this representation.

**Document:** LDP Strategy  
**Paragraph:** 6.99

**Section:** 6  
**Policy:**

**Page:** 037

---

### **Representation**

Ease of access by rail to Caerphilly from Cardiff (and in the reverse direction) is a good reason for celebrating the advantages that this can bestow upon Caerphilly.

---

### **Council Analysis**

The representation emphasises the advantages that can accrue to the county borough through the excellent rail link to Cardiff.

The Council fully recognises this point, and the accessibility between Caerphilly and Cardiff is a central feature of the Council's economic development strategy outlined in "Caerphilly: The Smart Alternative."

---

### **Council Response**

The comment is welcomed and noted.

**Document:** LDP Strategy  
**Paragraph:** 6.99

**Section:** 7  
**Policy:** 1

**Page:** 039

---

**Representation**

Clauses 3. and 5. are defectively drafted in including the word "OUR".

---

**Council Analysis**

It is agreed that the use of the word "OUR" in strategic policies was inappropriate.

---

**Council Response**

The policy wording no longer appears in that form in the Deposit LDP but none of the Strategy Policies now use such a phrase.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 1

**Page:** 039

---

### **Representation**

The words "ADJACENT TO" are too imprecise to provide strategic guidance. It neither equates to 'adjoining', nor gives any clue as to size of adjacent development.

Clause 6 needs to be more positive as to brownfield site use.

---

### **Council Analysis**

The representation is an objection to the use in Strategic Policy SP1 of the word "adjacent."

The meaning intended by the Council of the word "adjacent" in this context was "lying near or adjoining".

The representation also objects to the failure of the plan to specify the scale of the "adjacent" development. This was deliberate, because no useful indication could be given to cover all of the circumstances to which the policy was to apply.

The representation also contends that Clause 6 needs to be more positive as to brownfield site use, but no alternative wording is suggested.

The original SP1 policy has now been deleted and its concerns have been adequately covered in other new policies.

---

### **Council Response**

That no change be made to the plan in respect of this representation.

**Document:** LDP Strategy  
**Paragraph:** 6.99

**Section:** 7  
**Policy:** 3

**Page:** 039

---

### **Representation**

A grave omission is that of failure to refer to Green Wedges. Clause 3 is defectively drafted in including the word "OUR".

---

### **Council Analysis**

The Council considers that as a result of development patterns and pressure there is a need to define and maintain both open spaces within urban areas and between settlements. The green wedge policy seeks primarily to prevent coalescence and to prevent any further development that would be detrimental to the integrity of the individual settlements.

The representation is concerned with the omission of reference to Green Wedges in Strategic Policy SP3. The inclusion of a direct reference to green wedges in a strategy policy is considered inappropriate. Instead, area based green wedge allocation policies for each of the strategy areas have been included within the Deposit Local Development Plan, which seek to prevent the coalescence within and between settlements.

It is agreed that the word "our" is inappropriate in Local Development Plan policies.

---

### **Council Response**

The Deposit LDP includes area based green wedge allocation policies for each of the strategy areas, which seek to prevent the coalescence within and between settlements. Green wedges will not specifically be referred to in strategic policies.

The policies in the Deposit LDP will not include the inappropriate word "our."

**Document:** LDP Strategy  
**Paragraph:** 6.99

**Section:** 7  
**Policy:** 7

**Page:** 040

---

### **Representation**

These policies are partially duplicated - how necessary is it to include "WASTE MANAGEMENT/RESOURCE RECOVERY" in SP7, notwithstanding that this can be considered as a form of employment opportunity? It ought to naturally fall into one of the other categories in the list.

---

### **Council Analysis**

The objection is to the explicit identification of waste management / resource recovery as a possible use for land allocated for employment use in the plan in Policy SP7. The issue of waste management is of great and increasing importance, and the provision of sufficient land for suitable facilities in the plan is a European Union requirement. Therefore it was considered helpful in the Strategy Policies to make explicit reference to the fact that the development of waste management facilities would be allowed in principle on employment land.

---

### **Council Response**

The original Policy SP7 has now gone and been replaced by separate strategy policies covering employment land hierarchy / allocation and waste management facilities in the Deposit Plan, and the Waste Management Strategy Policy continues to acknowledge the part that class B2 industrial estates may play in hosting such facilities.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 12

**Page:** 040

---

### **Representation**

With regard to the 5th and 6th lines, CPRW thinks that "IMPACTS [OF EXPLOITATION] ARE ACCEPTABLE", but is not sure whether this is intended to relate to the impacts of sterilisation on other forms of development as well as to impacts upon local amenity.

---

### **Council Analysis**

This comment refers to the safeguarding of mineral resources and consideration of the impact of working or the impact of identifying safeguarding areas. The Deposit LDP safeguards all mineral resources in line with Welsh Assembly Guidance. However this does not imply that permission will be granted in those areas and the impacts of working the mineral at a particular location will be considered. The impact of safeguarding the mineral on the possible sterilisation of other development is taken account of in the Countywide Policy on Locational Constraints in the Deposit LDP, which sets out criteria against which proposals for development within mineral safeguarding areas will be assessed.

---

### **Council Response**

The comment is noted. The Deposit LDP safeguards all mineral resources in line with Welsh Assembly Guidance. However this does not imply that permission will be granted in those areas and the impacts of working the mineral at a particular location will be considered. The impact of safeguarding the mineral on the possible sterilisation of other development is taken account of in the Countywide Policy on Locational Constraints in the Deposit LDP, which sets out criteria against which proposals for development within mineral safeguarding areas will be assessed.

**Document:** LDP Strategy  
**Paragraph:** 8.6

**Section:** 8  
**Policy:** 7

**Page:** 041

---

### **Representation**

It is impossible to understand what is meant by this very convoluted section of text. CPRW's best attempt at an interpretation is given as a desired Change below. The revised wording does not, however, appear to make total sense.

---

### **Council Analysis**

The representation is that the references to Strategic Sites in Paragraph 8.6 is impossible to understand, and clarification is sought.

The term 'Strategic Site' is used in the preferred Strategy document to mean a site whose omission from the plan would jeopardise the successful implementation of the Preferred Strategy.

The Council considers that in this sense there are no strategic employment sites within the County Borough, and therefore the Deposit LDP makes no reference to them.

---

### **Council Response**

The Council considers that there are no Strategic Sites in the county borough, in the sense of those whose omission from the Plan would jeopardise its successful implementation, and therefore the Deposit LDP makes no reference to them.

**Document:** LDP Strategy  
**Paragraph:** 8.6

**Section:** 11  
**Policy:** 7

**Page:** 041

---

### **Representation**

Under New Developments/Buildings in the Countryside, it is assumed that this will include farm and rural diversification.

---

### **Council Analysis**

The Council has included a Countywide policy within the Deposit LDP that directly relates to the rural diversification. The policy seeks to protect the integrity of the rural economy, environment, and communities by only allowing appropriate development and diversification schemes in rural areas.

---

### **Council Response**

The Council has included a Countywide policy within the Deposit LDP that directly relates to rural diversification.

**Document:** LDP Strategy  
**Paragraph:** 1.1

**Section:** 1  
**Policy:**

**Page:** 005

---

**Representation**

CPRW notes with approval use of the word "reconcile" - leading to a more sustainability orientated attitude than that of "balancing" options.

---

**Council Analysis**

The Preferred Strategy document notes that the town and country planning system seeks to reconcile the development needs of the population with the wider environmental concerns for the conservation of the man-made and natural environment.

The representation approves the use of the word "reconcile" on the grounds that this leads to a more sustainability orientated attitude than that of "balancing" options.

---

**Council Response**

The comment is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 2.5

**Section:** 2  
**Policy:**

**Page:** 007

---

### **Representation**

The Wales Spatial Plan is to be 'refreshed' during 2007, and development options are currently being defined. These need to be taken into later account.

---

### **Council Analysis**

The representation notes that the Plan has to take into account the changes to be made in the Wales Spatial Plan (WSP), which is to be 'refreshed' during 2007.

The Council was involved in the refreshing of the WSP through regional partnership working, primarily through the SE Wales Strategic Planning Group (SEWSPG). The Updated Wales Spatial Plan was adopted by the Assembly in July 2008.

WAG Planning Guidance requires LDPs to take the Wales Spatial Plan into account, and the Deposit LDP does so.

---

### **Council Response**

The Updated Wales Spatial Plan adopted in July 2008 has been fully taken into account in the preparation of the Deposit LDP.

**Document:** LDP Strategy  
**Paragraph:** 2.20

**Section:** 2  
**Policy:**

**Page:** 009

---

**Representation**

This paragraph makes sound statements that echo those found in the draft Regional Transport Plan.

---

**Council Analysis**

The representation supports the comments in the Preferred Strategy on the importance of ensuring that the policies in the LDP and the Regional Transport Plan are consistent.

---

**Council Response**

The comment is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:** 2.21

**Section:** 2  
**Policy:**

**Page:** 010

---

### **Representation**

Too great an impression is given that transport (highway) improvements are to accompany development, rather than development sites being selected to complement existing or future public transport provision.

---

### **Council Analysis**

The Deposit LDP seeks to locate new development in locations along existing and proposed infrastructure networks that are accessible to pedestrians, cyclists, and to public transport, and to reduce congestion by minimising the need to travel, and by promoting more sustainable modes of transport by maximising the most efficient use of the existing transport infrastructure.

The rail links and a modal shift to walking, cycling and public transport will form the basis for the sustainable transport aims and objectives of the deposit local development plan. The provision of an efficient transport system is seen as an important part of moving towards a more sustainable, resource-efficient settlement pattern across the whole of the county borough. The council seek a longer term significant switch from private car use to public transport. As such, settlements with good access to existing rail services will be favoured for development. The council recognise that the settlements along the rail corridors are seen as the most appropriate locations for future development.

However, the council recognise that there is a balance that needs to be reached between reducing the need to travel and locating development at the main transport nodal points within the borough and the need to deliver economic and social improvements to the county that involve improving the transport system.

The council have included strategic transport policies within the deposit local development plan that seek to implement improvements to the existing transport infrastructure to improve access to employment opportunities, to shopping centres and to community and other facilities. A further strategic policy has been included that encourages sustainable transport requirements as part of development. This seeks to encourage a more sustainable transport infrastructure.

---

### **Council Response**

The Strategic Policy on Transport Requirements for Development in the Deposit LDP asserts the Council's intention of encouraging sustainable development that minimises the need to travel by promoting development in accessible locations. This principle has been fully taken into account in deciding on the site allocations proposed in the Plan.

**Document:** Candidate Site  
**Paragraph:** 2.29

**Section:** 2  
**Policy:**

**Page:** 011

---

### **Representation**

It is noted that a decision has been made against the safeguarding of mineral deposits in the Rhymney area (at Nant Llesg) because of the perceived adverse impact upon emerging tourism.

It ought to be acknowledged that coal mining will also, almost certainly, have an unfavourable impact upon the residential amenity of people living in the vicinity of workings.

---

### **Council Analysis**

The representation proposes that, even though the Preferred Strategy did not propose safeguarding mineral deposits at Nant Llesg, the Plan should acknowledge that coal mining will also almost certainly have an unfavourable impact upon the residential amenity of people living in the vicinity of workings,

Unlike the Preferred Strategy the Deposit Plan does include protection of this mineral resource. However, this does not mean that there is an acceptance of mineral working in a particular area, and no allocations for mineral extraction have been made. Any application would be judged against the policies in the Deposit LDP, including Policy CW3 which deals with residential amenity.

---

### **Council Response**

Whilst the Council is now minded to safeguard resources of coal, limestone, sandstone, and sand/gravel, residential amenity will be taken into account in determining any application for mineral extraction. However, it is not considered necessary to amend the Plan to include the comment proposed.

**Document:** LDP Strategy  
**Paragraph:** 5.2

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

The statement does not appear to pay sufficient regard to the locating of new development in proximity to existing public transport corridors.

---

### **Council Analysis**

The Council agrees that where possible development should be allocated to take advantage of existing and future public transport provision. The point is reflected in the strategic policies of the deposit local development plan which seek to encourage a more sustainable transport infrastructure. However, the council recognises that this may not always be possible and that a balance needs to be sought in respect of sustainable transport infrastructure network and the need to improve and in some cases expand the existing transport infrastructure to accommodate access to employment, shopping and community opportunities and facilities.

The point made in the representation is reflected elsewhere in the Plan which, encourages and promotes residential development to be targeted at settlements with good rail or bus services. The Plan therefore already recognises the importance of the point of the representation, but also accepts that this cannot be the sole or overriding determining factor in the location of development.

Further, provision of bus transport is essentially flexible, and therefore good public transport can be provided to any site allocated for development.

For these reasons it is therefore not considered that any change to the Plan on the lines proposed is either necessary or would be helpful.

---

### **Council Response**

The Council agrees that where possible development should be allocated to take advantage of existing and future public transport provision. The point is reflected in the strategic and countywide policies of the deposit local development plan which seek to encourage a more sustainable transport infrastructure. The plan encourages and promotes residential development to be targeted at settlements with good rail or bus services. The Plan therefore already recognises the importance of the point of the representation, but also accepts that this cannot be the sole or overriding determining factor in the location of development. As such, no change to the plan is recommended at this stage.

---

**Document:** LDP Strategy  
**Paragraph:** 5.2

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

No reference is made to provision of public transport, cycling and walking "services" in support of "employment opportunities".

---

### **Council Analysis**

The Council agrees that the plan should seek to promote travel modes other than car for employment and other purposes.

Strategy policies have been included within the Deposit LDP that seek to reduce the need to travel and provide safe alternative transport modes and routes for travelling to and within points of origins and destinations. The strategy policy relates to all forms of development proposed within the county borough.

A countywide policy has been included within the deposit local development plan that seeks to ensure that development proposals that are likely to generate a significant number of trips will only be permitted where walking, cycling and public transport modes of transport are actively encouraged, where green travel plans have been encouraged and provision for secure storage and facilities are provided for cyclists. The policy refers to all development proposals including employment proposals.

---

### **Council Response**

The council agree that the deposit local development plan should seek to promote travel modes other than the car for all uses including employment. Strategy policies that seek to reduce the need to travel and seek alternative forms of travel, ie walking, cycling and public transport have been included. A Countywide policy that seeks to ensure that development proposals that are likely to generate a significant number of trips will only be permitted where walking, cycling, and public transport modes of transport are actively encouraged, where GreenTravel Plans have been encouraged, and where provision for secure storage and facilities are provided for cyclists. The policy refers to all development proposals, including employment proposals.

**Document:** LDP Strategy  
**Paragraph:** 5.2

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

The "Regeneration" statement is too brief, vague and generalised to adequately capture what is generally regarded as regeneration.

---

### **Council Analysis**

The representation is that the eighth bullet point in Paragraph 5.2 plan should be amended to identify that "Regeneration" includes reference to the renewal of derelict and underused areas, and the re-use of land and buildings.

The term "Regeneration" is generally used to describe the huge range of actions taking place to turn around areas in which neglect and decline have left communities blighted by unemployment, poverty, poor housing, ill health and crime, and lacking access to shops, transport, skills, education, leisure and other services, community safety, leisure services, business support, transport and the physical environment.

"Regeneration" therefore certainly encompasses the areas identified by the representation, but also covers many other activities too numerous to mention. Providing a description of the term as proposed might answer this representation, but would open up the possibility of representations on other missing activities.

Section 5 is attempting to portray an overall view of the Vision for the county borough, and is therefore necessarily brief. The use of generally understood terms such as "Regeneration" without further definition is unavoidable if the section is to fulfil its purpose, and it is not considered that amendment in this case would be helpful.

---

### **Council Response**

That no change be made to the plan in respect of this representation.

**Document:** LDP Strategy  
**Paragraph:** 5.4

**Section:** 5  
**Policy:**

**Page:** 020

---

### **Representation**

CPRW considers that the sustainability ethic demands that "integration", rather than "balance", is the crucial factor when regeneration is delivered.

---

### **Council Analysis**

The Vision Statement is fundamental to the plan, and has been developed and endorsed through the community involvement process. This implies support for the current wording, and strong justification should be required for any proposed change.

The representation expresses a preference for a change in wording, but provides no arguments for the change, which in any case is arguably not substantive.

It is therefore recommended that the current phrasing should be retained.

---

### **Council Response**

That no change to the plan should be made in respect of this representation.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:** 023

---

### **Representation**

A more detailed map would be helpful.

---

### **Council Analysis**

The representation suggests improvements that could be made to the Key Diagram, which have been taken into account in the preparation of the Deposit LDP.

---

### **Council Response**

The names of the Principal Towns and Key Settlements have been added to the Key Diagram in the Deposit LDP as requested.

**Document:** LDP Strategy  
**Paragraph:** 6.19

**Section:** 6  
**Policy:**

**Page:** 024

---

### **Representation**

More than very limited housing development in villages, especially the more remote ones, will not be sustainable if residents are obliged to travel distances to access needed services [but see appendices for settlement detail].

---

### **Council Analysis**

The representation is concerned to ensure that developments are located in settlements where services are locally available, in order to avoid the need for increased travel, which would be unsustainable.

This principle is accepted, and has been taken into account in the selection of land allocations in the Deposit LDP.

---

### **Council Response**

The comment is noted, and has been reflected in the site selection process in the Deposit LDP.

**Document:** LDP Strategy  
**Paragraph:** 6.20

**Section:** 6  
**Policy:**

**Page:** 024

---

**Representation**

In the sub-heading above paragraph 6.20, the representation seeks to substitute the word "integrated" for the word "balanced".

The main thrust of the section is that the plan will seek to ensure that opportunities for development are distributed across the whole county borough area for the benefit of all residents, rather than simply responding to the development pressures in the south of the county borough . The term "balanced" reflects the Council's intentions better than the proposed word "integrated".

---

**Council Analysis**

FALSE

---

**Council Response**

**Document:** LDP Strategy  
**Paragraph:** 6.23

**Section:** 6  
**Policy:**

**Page:** 024

---

**Representation**

CPRW strongly supports the residential development aspirations as stated in this paragraph.

---

**Council Analysis**

The representation supports the proposal to distribute opportunities for residential development across the whole county borough, but to target them at settlements with good rail or bus services and also mining villages that require additional housing in order to promote and sustain them as viable residential areas. Where appropriate improvements to public transport provision and services will be sought as part of such development.

---

**Council Response**

This support is welcomed and noted.

---

**Document:** LDP Strategy Appendices  
**Paragraph:**

**Section:** 10

**Page:**

---

### **Representation**

As a resident of Trethomas and a supporter of the local conservation group, I am making my concerns known about plans for the future development of the green areas in the locality. There are numerous areas that can be improved and developed without encroaching on the habitat of various forms of wildlife. I hope the views of local people will be taken into consideration.

---

### **Council Analysis**

Comprehensive open space assessments, landscape studies and nature conservation study have been undertaken as part of the preparation of the local development plan. These studies have informed the allocations and designations that have been included within the local development plan including Sites of Importance for Nature Conservation (SINCs), Special Landscape Areas (SLAs) Visually Important Local Landscapes (VILLs), Green Wedges and formal and informal leisure allocations.

The Trethomas area, particularly the areas outside of the settlement boundary have been comprehensively covered by a variety of designations and allocations that will seek to protect the nature conservation interest, landscape quality, integrity and amenity of the settlement of Trethomas and the protection of existing leisure and community facilities within Trethomas.

The green areas within Trethomas that are not protected by a designation or allocation will still be subject to the same statutory planning procedures as all other sites that require planning permission when development is proposed. A strategic policy has been included within the LDP that seeks to maintain, enhance, protect and positively manage the natural heritage of the both the built and natural environment.

---

### **Council Response**

Comprehensive nature conservation, landscape and open space assessments have been undertaken as part of the preparation of the local development plan. The Trethomas area, particularly the areas outside of the settlement boundary has significant coverage of LDP nature conservation, landscape and leisure designations and allocations. The open green spaces within the settlement boundary have no protection policies. These sites will however, be subject to the statutory planning process if a development proposal is submitted on the site, which will consider the protection, enhancement, maintenance and management of natural heritage features within the natural and built environment.

---

**Document:** LDP Strategy  
**Paragraph:** 2.18

**Section:** 2  
**Policy:**

**Page:** 009

---

### **Representation**

Whilst acknowledging the regional housing apportionment exercise that is taking place, we are concerned with the level of housing provision proposed by Caerphilly, given that other authorities which have traditionally had higher completion rates, have not yet agreed/ or committed themselves to the lower figures being proposed for their authorities by the apportionment exercise. Should those authorities proceed with their traditional rates, there would appear to be no justification for such a high allocation for Caerphilly. We will therefore comment more fully, when there is greater commitment to the exercise and figures proposed from other South East Wales authorities.

---

### **Council Analysis**

The representation is concerned that the proposed housing provision in the Preferred Strategy is too high.

The Preferred Strategy identified a range of possible future housing growth in the county borough over the Plan period. The Council considers that the levels of net in-migration that are likely to be achieved justify a figure of only 8,625 for the housing provision in the Deposit LDP, less than the upper figure of the range proposed in the Preferred Strategy Document, and this may allay the concerns of the representor to some extent.

The full justification for this decision is given in Topic Paper on Population & Housing (see Section 4).

---

### **Council Response**

The concerns of the representation have been addressed to some extent in the Deposit LDP.

**Document:** LDP Strategy  
**Paragraph:** 5.2

**Section:** 5  
**Policy:**

**Page:** 019

---

**Representation**

Welcome the protection of the environment contained in the policy, particularly given the other issues referred to.

---

**Council Analysis**

The Council welcomes and notes the support. The vision for the protection of the environment as a whole has been included within the local development plan as a key aim of the document.

---

**Council Response**

The Council welcomes and notes the support.

---

**Document:** LDP Strategy  
**Paragraph:** 5.2

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

Clarification is sought on what the term 'regeneration of the surrounding countryside' means?

---

### **Council Analysis**

The representation seeks clarification of the term 'regeneration of the surrounding countryside.'

The term 'regeneration of the surrounding countryside' is a broad statement that refers to all aspects of sustainable development associated with the countryside. The Vision statement is only designed to be a brief statement that encapsulates the vision for the county borough for the plan period. A series of key objectives and aims are identified to support and deliver the vision statement. These objectives and aims will clarify all aspects of the Vision statement, and how the various parts of the Vision statement are to be delivered.

Section 5 is attempting to portray an overall view of the Vision for the county borough, and is therefore necessarily brief. The use of generally understood terms such as "Regeneration" without further definition is unavoidable if the section is to fulfil its purpose, and it is not considered that amendment in this case would be helpful.

---

### **Council Response**

That no change be made to the plan in respect of this representation.

**Document:** LDP Strategy  
**Paragraph:** 6.15

**Section:** 6  
**Policy:**

**Page:** 021

---

### **Representation**

Support the emphasis to retain the distinct identities of residential areas.

---

### **Council Analysis**

The council welcome and note the support.

Further support has been given to the retention of individual settlement identities through the designation of Green Wedges in the local development plan.

---

### **Council Response**

The Council welcomes and notes the support. Further support has been given to the retention of individual settlement identities through the designation of green wedges in the local development plan.

**Document:** LDP Strategy  
**Paragraph:** 6.21

**Section:** 6  
**Policy:**

**Page:** 024

---

### **Representation**

Support the principle of a balanced approach to managing future growth, with limited development in the Southern Connections Corridor, and more significant development opportunities proposed in the Northern Connections Corridor.

---

### **Council Analysis**

In view of the fact that, for example, over 90% of allocated housing units in the Southern Connections Corridor will be built on brownfield land, the Council welcomes and notes the support.

---

### **Council Response**

The Council welcomes and notes the support.

**Document:** LDP Strategy  
**Paragraph:** 6.23

**Section:** 6  
**Policy:**

**Page:** 024

---

**Representation**

Support the location of new residential development at settlements with good public transport and where it will help maintain the viability of existing settlements.

---

**Council Analysis**

The Council welcomes and notes the support.

---

**Council Response**

The Council welcomes and notes the support.

**Document:** LDP Strategy  
**Paragraph:** 6.26

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

Support the proposal to resist the development of brownfield land for housing in the Southern Connections Corridor, where it would undermine the role and function of principal towns or key settlements.

---

### **Council Analysis**

The Council has resisted private sector pressure to redevelop industrial estates in Caerphilly town in the Deposit Plan and welcomes and notes the support.

---

### **Council Response**

The Council welcomes and notes the support.

---

**Document:** LDP Strategy  
**Paragraph:** 6.33

**Section:** 6  
**Policy:**

**Page:** 026

---

### **Representation**

Whilst appreciating that a modal shift to using rail transport will not occur overnight there needs to be recognition that this change should occur as early as possible within the life of the LDP. This is not currently reflected in the wording of 6.33.

---

### **Council Analysis**

The representation is that policy wording should seek to establish changes in transportation behaviour at the earliest opportunity within the plan time period.

The Council agrees with the sentiment of this representation, the aims of which are reflected in the Deposit LDP.

---

### **Council Response**

The strategic policy on Transport Requirement for Development in the Deposit LDP asserts the Council's intention of promoting walking, cycling, and public transport, and of reducing both the length and number of car- borne journeys.

**Document:** LDP Strategy  
**Paragraph:** 6.34

**Section:** 6  
**Policy:**

**Page:** 027

---

**Representation**

Support the longer-term plans for improved rail infrastructure under 6.34.

---

**Council Analysis**

The representation supports the Council's longer-term aims of securing improved rail infrastructure, including both within the county borough and external links.

---

**Council Response**

The Council welcome and note the support.

**Document:** LDP Strategy  
**Paragraph:** 6.41

**Section:** 6  
**Policy:**

**Page:** 028

---

**Representation**

Support the proposal to ensure that the environment in areas planned for growth has the capacity to accommodate it, and the need to protect and conserve valued aspects of landscape and biodiversity.

---

**Council Analysis**

The council welcome and note the support.

---

**Council Response**

The council welcome and note the support.

**Document:** LDP Strategy  
**Paragraph:** 6.43

**Section:** 6  
**Policy:**

**Page:** 028

---

**Representation**

Welcome and support the recognition that the countryside is a positive asset that can strengthen regeneration and provide an enhanced quality of life for people.

---

**Council Analysis**

The council welcome and note the support.

---

**Council Response**

The council welcome and note the support.

**Document:** LDP Strategy  
**Paragraph:** 6.80

**Section:** 6  
**Policy:**

**Page:** 034

---

**Representation**

Welcome the provision in the plan for additional rail stations at Crumlin and Abercarn.

---

**Council Analysis**

The representation supports the Council's aim of securing additional rail stations at Crumlin and Abercarn.

---

**Council Response**

This support is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:** 6.83

**Section:** 6  
**Policy:**

**Page:** 035

---

### **Representation**

Welcome and support the priority and emphasis in the Risca and Caerphilly areas on the redevelopment of existing sites and not the release of substantial new Greenfield land.

However, Brownfield sites can develop to support important Biodiversity interests. Therefore, as part of the assessment process, sites should be subject to survey to establish their interest.

---

### **Council Analysis**

The council welcome and note the support in relation to not realising substantial new green field land for development in line with government legislation and guidance.

The council are committed to protecting the natural heritage that is present throughout the county borough. The council recognise the significant contribution brownfield land makes to biodiversity and full care and consideration should be given to this issue as part of the development process.

Site surveys of all allocated sites to establish the biodiversity interest will be undertaken , where considered necessary by the county ecologists or CCW at planning application stage.

All candidate sites were subject to a comprehensive countryside and landscape assessment. This assessed current and potential biodiversity interest and identified all the relevant surveys that would be required prior to the site being developed. Full ecological surveys were considered inappropriate at site assessment stage as the status of the site and the biodiversity interest could dramatically change in the two years before the local development plan is adopted, and ecological surveys are only valid for two years before another assessment is required. Surveys were considered more appropriate at planning application stage so the most accurate and effective biodiversity mitigation and/or compensation can be incorporated into development proposals for the site.

---

### **Council Response**

The Council welcomes and notes the support in relation to not realising substantial new green field land for development.

Comprehensive candidate site assessments were undertaken prior to sites being identified for allocation which looked in detail at the current and potential biodiversity interest,t and surveys that would be required at the planning application stage. It was considered full ecological surveys inappropriate at the candidate site assessment stage as the biodiversity status of the site could alter dramatically by the time the site is developed. Surveys were considered more appropriate at planning application stage so the most accurate and effective biodiversity mitigation and/or compensation can be incorporated into development proposals for the site.

---

**Document:** LDP Strategy  
**Paragraph:** 6.99

**Section:** 6  
**Policy:**

**Page:** 037

---

### **Representation**

As well as being a positive asset for recreation and tourism, the countryside also provides many benefits for health and well being.

---

### **Council Analysis**

A statement has been added to Section A of the Deposit LDP which clearly identifies the positive benefits that the countryside has upon the populations health and well being.

---

### **Council Response**

A statement has been added to Section A of the Deposit LDP which clearly identifies the positive benefits that the countryside has upon the health and well being of the population.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 1

**Page:** 039

---

### **Representation**

Support Strategic Policy 1:Sustainable Development Strategy.

---

### **Council Analysis**

The representation supports Strategic Policy 1 (SP1) in the Preferred Strategy. This policy is not included in this form in the Deposit LDP, but all of the criteria of Policy SP1 have been incorporated into other strategy or county wide policies within the Deposit LDP.

---

### **Council Response**

The Council welcomes and notes the support offered by CCW for Strategic Policy 1 (SP1) in the Preferred Strategy, all of whose criteria are incorporated within the policies of the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 2

**Page:** 039

---

### **Representation**

Support Strategic Policy 2: Good Design.

---

### **Council Analysis**

The representation supports Policy SP2: Good Design in the Preferred Strategy.

However, this policy has not been included in the Deposit LDP because WAG Planning Guidance requires national policy not to be repeated in LDPs, which can be found to be unsound if they do so.

---

### **Council Response**

The Policy SP2: Good Design in the Preferred Strategy has not been included in the Deposit LDP, because WAG Planning Guidance requires LDPs not to repeat national policy.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 3

**Page:** 039

---

### **Representation**

In Policy SP03 point 2, how are areas of natural green space to be defined and protected?

---

### **Council Analysis**

A strategic policy will provide overarching protection for natural green spaces from inappropriate development, whilst a countywide policies will refer to protection of general open spaces as a whole including green spaces. Allocations policies within the LDP and supporting text will specify as many open and natural green spaces for protection as possible in order to highlight their individual contribution to landscape/townscape. They will also refer to the definition of various types of open and natural green spaces and links will be made to a background paper where a study assessing access to such spaces will be discussed in depth.

---

### **Council Response**

Clearer links will be made between the plan policies and supporting documents to emphasise the importance of protecting natural green spaces. Particular reference will be made to an Open and Accessible Natural Green Spaces assessment undertaken by the Council with the assistance of external funding bodies and consultants.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 4

**Page:** 039

---

**Representation**

The Countryside Council for Wales supports Strategic Policy SP4: Renewable Energy.

---

**Council Analysis**

The representation supports Strategic Policy SP4: Renewable Energy.

---

**Council Response**

The Council notes and welcomes the support from CCW for Strategic Policy SP4: Renewable Energy.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 5

**Page:** 039

---

### **Representation**

Whilst there is support for the thrust of this policy, we would question whether it is realistic for it to be applied to all development proposals: e.g., would a household extension or a domestic garage be required to comply with the policy? Also, where does the 10% figure come from, and how does this relate to achieving Government targets?

---

### **Council Analysis**

A strategic policy has been included within the deposit local development plan that seeks to incorporate renewable energy technologies and energy saving techniques into new development. Renewable energy targets have been set to reflect the current national targets for renewable energy production. The plan sets a phased approach to the use of renewable energy and energy saving techniques during its lifetime, which seek to make the plan easier to implement and make a local contribution to the national renewable energy targets. The strategic policy refers to all new developments, although the reasoned justification indicates that some developments would be exempt from this policy, smaller developments including householder extensions for example.

At a more localised level, a countywide policy has been included within the deposit local development plan that seeks to ensure all new buildings have been constructed in line with sustainable development principles. The policy includes the requirement for new developments to be designed and constructed to at least BREEAM 'Very Good' standard or the Code for Sustainable Homes level 3. The policy refers only to new buildings and not householder extensions or similar smaller development proposals.

---

### **Council Response**

Government guidance and targets have provided the basis of the strategic and countywide policies that have been included within the deposit local development plan. A phased approach to renewable energy requirements within the local development plan seeks to address and fulfil the national targets for renewable energy at the local level. Both strategic and countywide renewable energy and sustainable development policies only apply to new build developments. Smaller, householder type development proposals are excluded from the policy context.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

Objection to the figures proposed pending the completion of the apportionment exercise and agreement by all authorities in the SE region.

---

### **Council Analysis**

The representation objects to the proposed scale of housing provision in the Preferred Strategy, and argues that a decision on this should be delayed until the Regional Housing Apportionment exercise has been completed..

The Regional Housing Apportionment exercise has now been completed, resulting in an annual house completion figure for Caerphilly of 650. However, the Council considers that the levels of net in-migration that are likely to be achieved justify an annual figure of only 575 for the housing provision in the Deposit LDP, and this figure has been used in the strategic policy on housing land.

It may be noted that, because of the need for flexibility and to allow for housing sites not being brought forward during the Plan period, the housing land allocations in the Deposit LDP are sufficient to meet the Regional Housing Allocation figure if required.

The full justification for this decision is given in Topic Paper on Population & Housing (see Section 4).

---

### **Council Response**

The housing land provision in the Deposit LDP has taken the result of the Regional Housing Apportionment exercise into account, as proposed by the representor.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 8

**Page:** 040

---

### **Representation**

Support the thrust of the policy and points 1 and 2.

However have concerns that easing of congestion points on the core road network will encourage increased car use, and add to CO2 emissions.

---

### **Council Analysis**

The representation expresses concern that highways improvements could encourage increased car use, and thereby add to CO2 emissions.

The Council recognises that over the plan period the car will be the predominant mode of transport, and therefore the plan has to address the problem of congestion. However, the promotion of sustainable transport modes and travel patterns are primary objectives of the Deposit LDP.

---

### **Council Response**

The Deposit LDP has to address the problem of congestion, but the promotion of sustainable transport modes and travel patterns are primary objectives of the Deposit LDP.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 9

**Page:** 040

---

### **Representation**

Support Policy SP9: Community Infrastructure and Affordable Housing.

---

### **Council Analysis**

In the preparation of the Deposit LDP, the Strategic Policy on Community Infrastructure and Affordable Housing has evolved into a new policy on Planning Obligations which addresses the same issues as the previous Policy SP9.

---

### **Council Response**

The support for the policy is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 10

**Page:** 040

---

### **Representation**

Support Strategy Policy SP10: Town Centre Hierarchy.

---

### **Council Analysis**

The Council welcomes and notes CCW's support for Strategy Policy SP10: Town Centre Hierarchy. This policy has now been replaced by two other Strategy Policies in the Deposit Plan; one on principal centre hierarchy and one to support commercial development.

---

### **Council Response**

The Council welcomes and notes CCW's support for the aims behind the original Strategy Policy SP10: Town Centre Hierarchy.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 11

**Page:** 040

---

### **Representation**

Support the principle of areas of search in Strategic Policy SP11: Waste Management. However, will comment more fully when areas are identified.

---

### **Council Analysis**

The Council welcomes and notes CCW's support in principle to the Strategic Policy SP11: Waste Management.

---

### **Council Response**

The Council welcomes and notes CCW's support in principle to the Strategic Policy SP11: Waste Management.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 12

**Page:** 040

---

**Representation**

Support the thrust of Strategic Policy SP12: Protection of Mineral Reserves.

---

**Council Analysis**

The representation supports the principle of Strategic Policy SP12: Protection of Mineral Reserves.

---

**Council Response**

The Council welcomes and notes CCW's support of Strategic Policy SP12: Protection of Mineral Reserves.

**Document:** LDP Strategy  
**Paragraph:** 8.1

**Section:** 8  
**Policy:**

**Page:** 041

---

**Representation**

CCW welcomes and supports the comprehensive assessment of sites.

---

**Council Analysis**

The Countryside Council for Wales supports the comprehensive assessment of the Candidate Sites that the Council has undertaken.

---

**Council Response**

The Council notes and welcomes CCW's support.

---

**Representation**

Recommend that the 'Potential for Protected Species' is added to this list. Similarly for tourism uses/golf courses, suggest that nature conservation interests is added to the list of factors to be assessed.

---

**Council Analysis**

The potential for protected species has been addressed in the more detailed and specialised Countryside and Landscape Candidate Site assessment proforma by the county ecologist. The Countryside and Landscape assessment proforma takes into account all of the potential impacts upon biodiversity, including protected species, regardless of the proposed use, which includes any potential tourism use. Where the development of the candidate site is considered to have significant and potentially damaging impacts upon protected species then the site was not recommended by the countryside and landscape section as suitable for further consideration as an allocated site within the local development plan. The potential for protected species was not included within the initial assessment or the tourism list as the officers undertaking these assessments would not have the relevant knowledge or expertise to make this decision or judgement.

There would also be a lack of professional and qualified judgement concerning the impact of 'nature conservation interest' in the tourism assessment. The relevant officer, i.e. the county ecologist, would not have made the nature conservation judgement on the tourism assessment. However, the countryside and landscape assessment of all of the candidate sites have undergone rigorous scrutiny from the county ecologist and all have taken into consideration the nature conservation interest of all the sites and the proposed uses.

---

**Council Response**

The Countryside and Landscape assessment proforma made full and detailed examinations of all the potential biodiversity interests on a site, including protected species. Where the county ecologists considered the development of the site to have significant and detrimental impacts upon protected species, then the site was recommended as not suitable for further consideration as an allocated development site. The placement of protected species and nature conservation interest on the tourism assessment would have resulted in professional officers with little or no ecological knowledge or qualifications making a judgement on biodiversity issues. The placement on the tourism assessment would have also resulted in repetition of assessment.

---

**Document:** LDP Strategy Appendices

**Section:** 9

**Page:**113

**Paragraph:**

**Policy:**

---

### **Representation**

The existence of Public Rights of Way within / along / close to a site should be included within the assessment.

---

### **Council Analysis**

All of the initial Candidate Site assessments have now been undertaken. The Countryside and Landscape assessment proforma did record the existence of public rights of way under the additional information and general site description.

---

### **Council Response**

All of the initial site assessments have now been undertaken. The Countryside and Landscape assessment proforma did record the existence of public rights of way issues.

---

**Document:** LDP Strategy Appendices

**Section:** 9

**Page:**113

**Paragraph:**

**Policy:**

---

### **Representation**

Reference should be made within the proforma to European and UK protected species.

---

### **Council Analysis**

The Countryside and Landscape assessment proforma contains European Protected Species and UK protected species and the county ecologist has given full consideration of these issues. Where the county ecologist considered that the development of a site would cause a significant or detrimental impact upon protected species then it was recommended that the site was not suitable for further consideration as an allocated site within the local development plan. Recommendations for the relevant surveys were also included within the countryside and landscape candidate site assessment proformas.

---

### **Council Response**

European Protected Species and UK Protected Species have been included within the Countryside and Landscape assessment which has been undertaken by the county ecologist.

---

**Document:** LDP Strategy Appendices

**Section:** 9

**Page:**121

**Paragraph:**

**Policy:**

---

### **Representation**

Reference required for protected species, particularly where proposals involve the reuse of buildings, loss of hedgerows, trees etc.

---

### **Council Analysis**

The countryside and landscape section proforma includes assessments which take into account the impact of the removal of trees, hedgerows, buildings etc in relation to both the landscape and biodiversity. It is not considered necessary to repeat the same questions in other specialist assessment proforma's

---

### **Council Response**

The countryside and landscape section proforma includes assessments which take into account the impact of the removal of trees, hedgerows, buildings etc in relation to both the landscape and biodiversity. It is not considered necessary to repeat the same questions in other specialist assessment proforma's

---

**Document:** LDP Strategy Appendices

**Section:** 9

**Page:**141

**Paragraph:**

**Policy:**

---

### **Representation**

Welcome and support the Countryside and Landscape assessment proforma. The last paragraph of section 26 should identify the possible requirement for a licence (obtainable from the Welsh Assembly Government) if a species or its habitat is to be disturbed, and consultation with CCW to assess the favourable conservation status of the species.

---

### **Council Analysis**

All of the site assessments have been completed and it is now too late to amend the contents of the proformas. However, Section 34 of the Countryside and Landscape Sections candidate site assessment proforma identifies additional ecological surveys and assessments that are required for the site prior to development. There is also an additional comment/ observation section that enabled the county ecologist to identify other pertinent issues that should be addressed prior to the development of the site.

---

### **Council Response**

All of the site assessments have been completed, and it is now too late to amend the contents of the proformas. However, Section 34 of the Countryside and Landscape Candidate Site assessment proforma identifies additional ecological surveys and assessments that are required for the site prior to development. There is also an additional comment/ observation section that enabled the county ecologist to identify other pertinent issues that should be addressed prior to the development of the site.

---

**Document:** LDP Strategy Appendices

**Section:** 9

**Page:**154

**Paragraph:**

**Policy:**

---

### **Representation**

The Countryside & Landscape site assessment pro-forma should include reference to the Natural Environment and Rural Communities Act 2006, particularly Section 42 and your authority's duty to have due regard to biodiversity while carrying out its functions.

---

### **Council Analysis**

Reference to the Natural Environment and Rural Communities Act 2006, particularly Section 42 should be included in section 28, which should make reference to the LPA's duty to have due regard to biodiversity while carrying out its other functions.

---

### **Council Response**

Reference to the Natural Environment and Rural Communities Act 2006, and in particular to Section 42 of the Act, has been added to the Guidance Notes that accompany the Countryside and Landscape pro-forma, which also makes reference to the LPA's duty to have due regard to biodiversity while carrying out its other functions.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Nelson has become a 'dormitory' village/small town due to the over-development of housing. A further 90 houses east of Handball Court will, in my opinion, bring us to a satisfaction point.

1) Will our antiquated sewer systems cope? Some residents in 'newer' houses suffer sewerage rising in lawns and back gardens now!

2) Nelson's medical facilities are totally inadequate for the existing number of patients. Should a new build be proposed, where is the land to be found? Where will extra doctors and nurses come from? Existing car park facilities are practically non-existing. An area near Bryncelyn surgery would have alleviated the problem if C.C.B.C., as requested, had used it for parking rather than allowing planning for further housing on the site.

3) Will our local schools cope with increased intake?

LDP Preferred Strategy for Development Opportunities in the North All well and good, but might I point out that the A472 Ystrad Mynach to Nelson is NOT the best access to the A470, being narrow and torturous in sections, so that the slightest mishap traffic wise on the smallest road repairs etc causes chaos and long delays. I would suggest the superior A469 Ystrad Mynach - Caerphilly - A470 - M4 would be a better and faster route. Also Ystrad Mynach - Caerphilly - Cardiff has a good rail link.

---

### **Council Analysis**

In response to the first point regarding the ability of the sewerage system to cope with additional development, it is advised that Welsh Water have been consulted on all new housing sites to determine the capacity of the sewerage system to accommodate new development. Where the need for improvements to the network have been identified and no regulatory improvements are identified within the next 5 year programme, the Appendix to the LDP indicates that developers may need to fund improvements to the network on specific sites.

With regards to the second site, the Local Health Board have been consulted to determine future requirements for facilities across the County Borough. As part of this consultation, the need for replacement and additional GP surgeries and other health facilities have been identified and allocated in the plan accordingly. Whilst new GP surgeries are proposed in the nearby settlements of Gelligaer and Ystrad Mynach, the consultation with the Health Board did not identify a need for additional facilities in Nelson and as a result no new sites are proposed in the Deposit LDP.

In relation to the third issue, the education department have been consulted with regards to the capacity of school to accommodate additional pupils generated from new development. As part of this consultation there was not considered to be any issue with regards to capacity, but if the situation changed in the future, developers will be required to contribute towards education provision as part of planning obligations as set out in the LDP.

---

### **Council Response**

No change is required as a result of this representation.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 4  
**Policy:**

**Page:** 017

---

### **Representation**

We had expected to be able to examine the Key Issues in this important document rather than being referred to other documents. We recommend that the Key Issues are identified and listed in this section.

---

### **Council Analysis**

The representation is concerned with the need to refer to a document separate from the Preferred Strategy document in order to examine the Key Issues.

The Preferred Strategy document was organised as a Report together with a number of Appendices, in order to reduce the length of the Report and so make it more intelligible.

In preparing documents for the LDP the aim will always be to make them as easy to use as possible, so the spirit of the representation is accepted: however, in practice there will always be disagreements as to how this aim can best be achieved.

---

### **Council Response**

The comment is noted, and the need for user-friendly documents has been an important consideration in the preparation of the Deposit LDP. It must be noted nonetheless that the total documentation required by the LDP process is considerable, and that there are no complete solutions to the problem of simplifying this.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:**

---

### **Representation**

We support your use of the four themes of the Community Strategy in the Vision Statement, and suggest that for clarity these themes are used to contain your Strategic Policies.

---

### **Council Analysis**

The representation proposes that the Plan's Strategic Policies should be organised according to the four themes of the Community Strategy.

In principle this proposal is commendable in principle, but impractical. The Strategic Policies of the Plan are cross-cutting in relation to the themes, and are heavily weighted towards the Living Environment theme.

---

### **Council Response**

The proposal to organise the Plan's Strategic Policies according to the four themes of the Community Strategy is commendable in principle, but impractical.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 3

**Page:** 039

---

### **Representation**

#### Strategic Policies

We have noted that item 22 of your Community Strategy within Education for Life Objectives is to increase opportunities for, and participation in, leisure, sport, cultural and arts activities. However, although cultural activities and cultural facilities are mentioned briefly in various items in Chapter 6 Development Options, we can find no reference to the provision of new cultural opportunities or the protection and promotion of your existing cultural facilities within any Strategic Policy. SP3 alludes to the protection of existing facilities but does not mention cultural buildings. The wording of policies needs to be robust for clarity because they determine whether or not and how, development can take place. The Wales Spatial Plan states on page 51 that the tourism and leisure sector has the potential to contribute to a much greater extent to the area's economy. This includes heritage, culture, events and countryside based activities and destinations. As drivers for economic development, cultural activities such as theatre, arts and tourism are fast growing sectors, and cultural facilities are a fundamental and dynamic part of this cultural asset base. Culture includes visual arts and music, the performing arts, crafts, museums, libraries, theatre, cinema and tourism. To reinforce the Council's commitment to culture, attention should be given to increasing participation in cultural activity, increasing awareness and choice through enhancing cultural opportunity and enriching residents' quality of life through access to culture. We suggest that your Strategic Policies be made more robust.

---

### **Council Analysis**

This objection has been noted and has been considered in the production of the Deposit Plan where the Leisure and Tourism Policies are more specific and detailed.

---

### **Council Response**

This objection has been noted and has been considered in the production of the Deposit Plan where the Leisure and Tourism Policies are more specific and detailed.

---

**Document:** Candidate Site  
**Paragraph:** 2.29

**Section:** 2  
**Policy:**

**Page:** 011

---

### **Representation**

The Coal Authority was consulted prior to this draft to identify areas of viable coal reserves which could then be considered for safeguarding. The draft acknowledges that we identified the Nant Llesg reserves as being worthy of safeguarding. The reserve was proven in area, quality and geological structure by British Coal prior to privatisation.

I am very disappointed to read that the draft has discounted our representations in favour of what is referred to as an "Emerging Tourism Strategy". I object to this approach on two grounds:-

1) The Nant Llesg reserve is of strategic importance to Wales and possibly the rest of the UK as it has the proven potential to provide a much needed energy source for the medium term future from indigenous coal production at a time when the UK will be heavily dependent upon coal to provide electricity, the majority of which will be imported. The world market for coal in the future is likely to be strong. Developing countries like China and India are and will be importing significant volumes of coal to support their national development which will place the UK at a serious disadvantage in procuring its coal needs from imports. To dismiss the opportunity to simply safeguard the Nant Llesg reserve, which I believe brings with it no presumption in favour of working, on the basis of an emerging tourism strategy to me seems wholly inappropriate. Surely there would need to be a preferred alternative use for the land which has a higher planning importance.

2) The Nant Llesg reserve is of strategic importance for Wales and the UK, which is surely of greater significance than an emerging tourism strategy of a single county. As coal can only be worked where it is found and as this reserve is the only area identified in the county worthy of safeguarding, I am sure that the view you have concluded should be revisited in the context of a proven reserve of required energy having greater importance than the potential of an emerging strategy for a non energy based use. If the Nant Llesg reserve is lost to any other form of development then the energy value it represents will be lost. On the other hand if the reserve were to be worked the land is then freed up for alternative development in the future which is clearly sustainable and fits with your SP1 to "Develop and use land on the basis of environmental, social and economic needs". There is and will continue to be an economic need for the coal at Nant Llesg.

---

### **Council Analysis**

The Preferred Strategy did not make provision for the safeguarding of mineral resources. Prior to 1996 British Coal identified resources at Nant Llesg as being proven in area, quality and geological structure. The resource is of strategic importance to Wales and the UK.

WAG Guidance (Minerals Planning Policy Wales and the draft Coal Technical Advice Note) requires LPAs to protect mineral resources including coal from sterilisation by permanent development. Minerals are a finite resource and it is prudent to prevent sterilisation for the future even though they may not be required immediately. Safeguarding does not mean that there is an acceptance of mineral working in a particular area, no allocations have been made, and any application would be judged against all the policies in the Deposit LDP.

---

### **Council Response**

Taking into account the objections raised on this issue and the National Guidance in Minerals Planning Policy Wales and the draft Coal Technical Advice Note, the Deposit Plan includes Policy SP9, which safeguards all mineral resources. This is not, however an indication that a particular site within those areas is acceptable. Any application will be assessed against all the policies in the Deposit LDP.

**Document:** LDP Strategy  
**Paragraph:** 6.4

**Section:** 6  
**Policy:**

**Page:** 021

---

**Representation**

In general I would agree with some elements of the preferred strategy including plans to develop and encourage private investment in the North of the County and link with the Heads of the Valleys Plan.

I would also support the use of Brownfield sites for development and totally oppose the use of Greenfield sites for this purpose.

---

**Council Analysis**

The representation supports some of the component parts of the Preferred Strategy, in particular the aim of encouraging private investment in the Heads of the Valleys Regeneration Area, and the use of Brownfield rather than Greenfield sites for development.

---

**Council Response**

This support is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 2  
**Policy:**

**Page:**

---

### **Representation**

Further comments on the plan are that there is little mention of railway system development and though I understand that a separate Regional Transport Plan is being developed there is no reference as to how this plan will cross reference with the LDP.

The Strategy for Capital Network states that a priority is to "strengthen and re-integrate existing systems for towns and cities within SE Wales so that the area functions as a coherent urban network.....Integrated transport is crucial to this" Surely it would be helpful if integration started with an Integrated Plan which included transport and leisure.

---

### **Council Analysis**

The representation is concerned that the plan should incorporate the proposals in the South East Wales Regional Transport Plan (RTP).

The Council shares these concerns, but the draft RTP was only published in June 2008, and the final RTP is expected to be adopted in February / March 2009.

However, as far as has been possible, the Deposit LDP has been prepared to incorporate the proposals in the draft RTP that affect Caerphilly CB.

---

### **Council Response**

The South East Wales Regional Transport Plan will not be adopted until next year, but the Deposit LDP has been prepared to incorporate as far as possible the proposals in the draft RTP that affect Caerphilly CB.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

My other concern is that the plan does not include any development of leisure facilities.

Turning Heads - the Strategy for Heads of the Valleys 2020 prioritises, among other themes the theme of "an appealing and coherent tourism and leisure experience". There is mention of cycle and footpath development but not mention of development of bridleways or equine leisure facilities.

A priority in the proposed strategy is to provide for recreational needs of local residents and I would point out that Nelson has always had a large amount of adults and children who participate in equine leisure activity. There are no facilities to enable the safe participation in this activity and the LDP does not include any. I object to this omission.

---

### **Council Analysis**

This representation relates to the Preferred Strategy which is a strategic document without allocations for specific uses. The allocation of land for leisure and tourism development has been made in the Deposit LDP, which includes provision for bridleways and equine use in the form of new country parks and development within existing areas of open space. Also there are strengthened protection policies for existing leisure facilities (including open spaces currently containing bridleways) which seek to ensure that all residents have access to spaces for a range of activities within as close a proximity as possible.

---

### **Council Response**

Detailed reference is made to leisure facilities, including open and accessible natural green spaces, in the Deposit LDP, and it is hoped that these address most of the concerns of the representor.

**Document:**  
**Paragraph:** All

**Section:**  
**Policy:**

**Page:**

### Representation

Document inaccessible to regular members of the public because of size and format. Document too technical and laden with jargon. Over reliance on ability to access other documents/strategies that support this document. Members of the public not included on the Sustainability Group which would have reduced this barrier to inclusion.

### Council Analysis

It is accepted that the SEA/SA is a large and specialised document that members of the general public may well find difficult to penetrate.

However, the production of an SEA/SA requires the consideration of detailed factors relating to all aspects of the environment. At the beginning of the process the Council acknowledged that it did not have the necessary expertise and knowledge to undertake the task on its own. It therefore set up the Sustainability Group, consisting of representatives from a wide range of background, that bring expertise and knowledge of their areas to the SEA/SA process: this Group has been instrumental in the production of the SEA/SA.

Whilst every effort has been made to make the SEA/SA as easy as possible to read, it is accepted that because of the nature of the information contained within it, the SEA/SA may still be a daunting prospect to the general public. Whilst every reasonable effort will be made by the Council to make future SEA/SA documents more penetrable, it is unlikely that it will make it any easier for the general public.

The SEA/SA considers a huge amount of information on all factors relating to the state of the environment, including economic and social factors. It would be inappropriate to include this information within the document itself, or to include it as an appendix, as it would result in an extremely large document that would be very difficult to use. and would increase significantly the amount of information that would need to be read by potential representors to the LDP. In order to reduce the size of the document and reduce the amount of information that any representor needs to read, the pertinent information is provided in the document, whilst the complete information is referenced from its origin (often a web site address). This way of dealing with the information is considered to offer the best compromise between information available and the length and content of the SEA/SA.

As outlined above the Sustainability Group was set up with the specific purpose of providing expert knowledge and information for the production of the SEA/SA. All the members of the Sustainability Group have significant amounts of information and expertise relevant to their own field that has been used in producing the SEA/SA. The membership of the Sustainability Group was originally devised to reflect the 11 factors listed in Article 1 to the SEA Directive, with a representative from the Council and a representative from an external body being sought. This would also lead to a group of 22 which would be close to the limit for producing worthwhile output from the group. The make up of the group has been modified subsequently to incorporate 3 additional members who usefully provided information not previously available to the group. In this way the Sustainability Group is different from other LDP Management Groups whose role is to include the general public in the process of producing the LDP. As such, given the remit and role of the Sustainability Group it was, and still is, considered inappropriate to include members of the general public.

It is accepted that information on the production of the SEA/SA could be released on a regular basis to enable people to be kept up to date on where the SEA/SA is, and what is going to happen in the

near future. Regular bulletins on the progress of the SEA/SA will be included in the Council Paper "Newslines" and will be included on the Council web site.

---

**Council Response**

No formal change to the documents be made in respect of these comments. However the Council will endeavour to make future documents of the SEA/SA more penetrable to the general public, within the scope of the complexity of the issues that need to be considered within it. The Council will also provide updates on progress on the SEA/SA in the Council Paper "Newslines" and on the Council web site.

**Document:** LDP Strategy  
**Paragraph:** 6.11

**Section:** 6  
**Policy:**

**Page:** 022

---

### **Representation**

Where possible non-residential development opportunities will be focussed on the Principal Towns in the first instance, in order to ensure their continued viability, as centres for economic and social activity. The HBF supports this principle and agrees that an effective way of ensuring communities continue to thrive is to concentrate on areas that are conducive to investment. However, to ensure the continued success of these communities and to allow them to retain their investment-attractive qualities, any proposed economic growth should be aligned with sufficient housing growth to accommodate it.

---

### **Council Analysis**

Housing allocations will be targeted towards those settlements where the growth can be most sustainably accommodated.

---

### **Council Response**

Housing allocations will be targeted towards those settlements where the growth can be most sustainably accommodated.

---

**Document:** LDP Strategy  
**Paragraph:** 7.1

**Section:** 7  
**Policy:** 1

**Page:** 039

---

### **Representation**

The HBF agrees with the principles behind the criteria of the policy, but for the reasons explained throughout these representations, objects to the fact that the Preferred Strategy put forward does not accord with the criteria and would not achieve the principles of this Policy.

---

### **Council Analysis**

The representation contends that the Preferred Strategy put forward does not accord with the principles of the criteria of Strategic Policy SP01.

The Council disagrees with this assertion. The only evidence cited in its support refers to other representations submitted by the representor: responses to these representations will be found elsewhere in this report.

It should be noted that the Strategic Policy SP01 is not included in this form in the Deposit LDP, but the criteria of the Policy are either contained in other policies, or have been used in the selection of sites allocated for development in the Plan.

---

### **Council Response**

The principles of the criteria of Strategic Policy SP1 in the Preferred Strategy document were fundamental to the Preferred Strategy adopted for the Plan, and have provided the basis for the preparation of the Deposit LDP. The Council does not accept that the contradiction alleged by the representation exists.

---

**Document:** LDP Strategy  
**Paragraph:** 7.1

**Section:** 7  
**Policy:** 5

**Page:** 039

---

### **Representation**

The HBF would like clarification of the 10% figure within the policy. The Federation is aware that the latest climate change consultation put forward by the Welsh Assembly Government proposes that developments should reduce carbon emissions by 10% from the baseline set by building regulations, but this is not clear from the policy SP5. The policy advocates a reduction of 10% but gives no point of reference. For clarity, if it were in keeping with the WAG's draft guidance suggesting of a 10% reduction from the baseline of Building Regulations, then the HBF would support this. However, the HBF objects to the wording of this policy. It is far more effective to create an energy efficient building through the fabric of its construction and layout, than to use renewable energy production measures. If the 10% reduction can be achieved without the use of renewable energy generation then any renewable energy measures should not be required as part of the development. The Policy should be reworded to reflect this.

---

### **Council Analysis**

A strategic policy has been included within the deposit local development plan that seeks to incorporate renewable energy technologies and energy saving techniques into new development. Renewable energy targets have been set to reflect the current national targets for renewable energy production. The plan sets a phased approach to the use of renewable energy and energy saving techniques during its lifetime, which seek to make the plan easier to implement and make a local contribution to the national renewable energy targets. All targets are set against the government 1990 base levels. The strategic policy refers to all new developments, although the reasoned justification indicates that some developments would be exempt from this policy, smaller developments including householder extensions for example. The strategic policy indicates that the the targets set in the policy can be achieved by a combination of energy efficiency and renewable energy technology.

At a more localised level, a countywide policy has been included within the deposit local development plan that seeks to ensure all new buildings have been constructed in line with sustainable development principles. The policy includes the requirement for new developments to be designed and constructed to at least BREEAM 'Very Good' standard or the Code for Sustainable Homes level 3. The policy refers only to new buildings and not householder extensions or similar smaller development proposals.

---

### **Council Response**

The policy wordnig has now been amended and has removed the reference to the 10% figure. Government guidance and targets have provided the basis of the strategic and countywide policies that have been included within the deposit local development plan. A phased approach to renewable energy requirements within the local development plan seeks to address and fulfil the national targets for renewable energy at the local level. This phased approach, including the targets have been included within the reasoned justification. All targets will be measured against the government 1990 base levels. Both strategic and countywide renewable energy and sustainable development policies only apply to new build developments. Smaller, householder type development proposals are excluded from the policy context.

**Document:** LDP Strategy  
**Paragraph:** 7.1

**Section:** 7  
**Policy:** 9

**Page:** 040

---

### **Representation**

The HBF would like to see emphasis on justification within the wording of the policy. In accordance with circular 1/97 planning obligations must adhere to the tests of reasonableness. Even though the HBF is aware that it is not the purpose of the LDP to repeat national planning guidance, the federation believes that there should be an indication within the policy that the benefits sought will be reasonable, justified, and directly related in scale and kind to the development proposed.

---

### **Council Analysis**

The representation is that the Plan should include additional information on the contributions the Council may seek from developers as planning obligations.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to include this information within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

---

**Document:** LDP Strategy  
**Paragraph:** 6.12

**Section:** 6  
**Policy:**

**Page:** 022

---

### **Representation**

This paragraph states that Principal Towns are capable of supporting a myriad of services and are essential to prosperity of County Borough and overall quality of life for residents. Considering the towns included in the 'Principal Towns' list, the HBF agrees with this statement and strongly recommends that in these areas residential development is given equal priority to that of non-residential development. If as given within Paragraph 6.12, the aim of the Preferred Strategy is to strengthen the vitality and viability of Principal Towns, and if they are to continue to attract and maintain a full range of services and facilities, the appropriate amount of residential development within those areas will be a key driving factor in achieving these objectives and facilitating their success.

---

### **Council Analysis**

The scale and ratio of residential and non-residential uses in Principal Towns will be balanced in order to ensure adequate provision of facilities and infrastructure with housing growth.

---

### **Council Response**

The scale and ratio of residential and non-residential uses in Principal Towns will be balanced in order to ensure adequate provision of facilities and infrastructure with housing growth.

---

**Document:** LDP Strategy  
**Paragraph:** 6.17

**Section:** 6  
**Policy:**

**Page:** 024

---

### Representation

The HBF acknowledges the possibility that the Heads of The Valleys programme may make the Northern areas of the County Borough more attractive to investment, and we support a strategy that takes account of the work being undertaken with the Heads of the Valleys Programme. However, the HBF strongly objects to a strategy that considers these options at the expense of the areas within the County Borough that are most attractive to investment. Paragraph 6.20, under the heading 'promote a balanced approach to managing future growth' states that 'The Southern Connections Corridor and in particular Caerphilly Town is currently the most attractive area for potential investors, but a strategy which solely relies on the south of the county borough for economic progress is unsustainable in the long term". The HBF strongly disagrees with this statement. The HBF recognises that the aim of the Strategy is to try and regenerate communities that have experienced decline, however, the Federation disagrees with the principle of this model as a vehicle for this. If the areas concerned lack any sufficient market for jobs and housing etc there is the distinct possibility that sites allocated may be left redundant and as a consequence of this, the areas that are most attractive to investment may experience decline. The HBF believes that a more effective way to achieve regeneration is to concentrate on areas that are conducive to investment and align economic growth with housing growth. This, coupled with an existing transport infrastructure linking developments, may allow growth to exude into surrounding areas, hence precipitating regeneration in areas that are in need.

Alter Preferred Strategy to take account of the above representation. Regeneration must be undertaken across the County Borough as an imbalance in investment in the wider area is likely to lead to far more adverse effects overall than with a more equal spread of investment. Regeneration must be undertaken across the County Borough as an imbalance in investment in the wider area is likely to lead to far more adverse effects overall than with a more equal spread of investment.1

FALSE

---

### Council Analysis

---

### Council Response

### **Representation**

The HBF objects to the principle that significant development opportunities should be limited to the Principal Towns and Key Settlements in the Northern Connections Corridor, and that this will spread prosperity throughout the County Borough. To promote such growth in these areas at the expense of growth in the actual regeneration powerhouse of the County Borough i.e. Caerphilly and the Southern Connections Corridor, will have an adverse effect on the success of these areas and may also have a negative impact on the success of the County Borough as a whole.

Restricting residential growth in the Southern area and Caerphilly Town through policy intervention has the potential to have severe impacts on house price, choice and affordability, especially at a time when these issues are a major concern throughout Caerphilly and indeed South East Wales. The Preferred Strategy states that the LDP will be one of four main strategies that will have an effect on the future success of the County Borough, and will have regard to the principles and objectives entrenched within other three. The objective of the Living Environment Partnership Strategy is to encourage development and maintenance... of homes and residential environments that can meet ALL needs. Therefore, to propose a strategy that has the potential to have an adverse effect on the affordability, choice and quality of the housing market, in an area that will clearly attract a significant amount of investment in this market sector, is a clear departure from this objective and has the potential to cause break on the economic competitiveness of Caerphilly and the Southern Connections Corridor. If this perpetuates, the attractiveness of Caerphilly and the Southern Connections Corridor will lapse and potential investment may go elsewhere. In addition to this, if housing is not given substantial consideration alongside economic development, there will be a misalignment between housing growth and job growth. This has the potential to result in an increase in commuting, which will have a negative impact on traffic congestion and pollution and in turn will cause more harm to the environment.

Given the importance of the issues described above, the principle of restricting growth in more attractive areas in the hope of forcing investment to less established areas that require regeneration is a dangerous development strategy for the County Borough as a whole for two main reasons:-

1. If investment moves elsewhere in Caerphilly County Borough at the expense of the Southern areas and Caerphilly Town, this may cause the southern areas to stagnate and perpetuate a decline of the positive regeneration work and success that these areas have achieved over recent years. Areas are attractive to potential investment for a reason, and failure to continue to concentrate and capitalise on that 'reason' will inevitably create an area that is less attractive to potential investment. A strategy that takes a thriving economic powerhouse of an area and deliberately restricts its ability to continue to attract potential investment, in an attempt to redirect that investment to other parts of the County Borough, may damage the economic and social success of that area and hence undermine the its ability to help regenerate the rest of the County Borough.

2. The second reason could be even more alarming. That is, if the strategy is successful and investment moves away from Caerphilly all together. It is possible that if Caerphilly Town and its surrounds are not allowed to continue to develop at the appropriate rate, future investment could be re-directed to other parts of Wales or even outside Wales into England. If this scenario occurs, the success of Caerphilly Town and the Southern Connections Corridor will be compromised without any benefit to the County Borough as a whole.

In light of these issues, it is the HBF's opinion that a strategy which promotes regeneration in areas of need whilst still allowing the successful areas to thrive, would be a more beneficial option for the future development of Caerphilly County Borough. If areas that are attractive to potential investment are allowed to grow and prosper, they can radiate benefits to other areas that require investment. The Southern Areas and Caerphilly provide a well-established base for this and provided links can be improved with the Northern areas, the potential for growth and success of the

County Borough as a whole could be far greater with a strong and successful Caerphilly Town and surrounding area acting as a driving force for regeneration.

---

### **Council Analysis**

Development policies in the plan will build on existing success throughout the County Borough but they also provide opportunities to those areas who have not in the past benefited from investment in infrastructure.

---

### **Council Response**

Development policies in the plan will build on existing success throughout the County Borough but they also provide opportunities to those areas who have not in the past benefited from investment in infrastructure.

---

**Document:** LDP Strategy  
**Paragraph:** 6.26

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

The Strategy states that the Southern Connections Corridor is well provided for in terms of brownfield sites and stipulates that where development would not have an adverse effect on the role and function of the County Borough, appropriate forms of development would be permitted. Planning Policy Wales states that residential development is considered a suitable form of development for brownfield sites. In light of this, the HBF objects to the statement within the paragraph that "the plan will resist development of brownfield sites for housing within the Southern Connections Corridor..."

Restricting development within the Southern Areas and Caerphilly will undoubtedly have an adverse effect on the function and success of the Principal Towns and Key Settlements, and as a result, brownfield land within areas that have a patent demand for housing, that would be suitable for residential development, should not be prevented from development in the hope that the investment will be forced into areas with much lower demand.

The HBF has major concerns with the implications of this policy approach. The demand for housing in Caerphilly Town and Southern Connections area is growing and house prices in Caerphilly Town are at record levels. There is also a recognised affordability problem in Caerphilly and to suggest that residential development will be resisted, even when there are areas of brownfield land suitable to accommodate it, seems to be illogical and is also at odds with the objective of capitalising on the proximity of Cardiff. Given the problems of house choice and affordability, and the fact that there will be no restriction on employment opportunities, the Strategy has the potential to undermine the role and function of Caerphilly and the Southern Connections Corridor and has the potential to add more fuel to an ever increasing fire.

---

### **Council Analysis**

Residential development of brownfield sites must be considered in the context of the role and function of the settlement. As a result such sites may need to be reserved for other developments.

---

### **Council Response**

Residential development of brownfield sites must be considered in the context of the role and function of the settlement. As a result such sites may need to be reserved for other developments.

---

**Document:** LDP Strategy  
**Paragraph:** 6.26

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

Paragraph 6.33 states that because changing the land-use transport system will take a number of years there will be a requirement to produce more sustainable resource efficient settlement patterns across the county. In this context, providing the appropriate amount of housing in the areas that will attract the most investment will inevitably create places that reduce the need to travel, which will contribute significantly to this aim. In addition to this, the spin off benefits from developer contributions etc, will no doubt play a vital role in upgrading the transport network and create better and more sustainable transport links between settlements, which will allow growth to be spread throughout the county borough in a more resource efficient and sustainable manner.

---

### **Council Analysis**

Amongst the main components of the Preferred Strategy are the promotion of resource efficient settlements and the providing infrastructure improvement through development hence these are recognised priorities to achieve long term sustainability.

---

### **Council Response**

Amongst the main components of the Preferred Strategy are the promotion of resource efficient settlements and the providing infrastructure improvement through development hence these are recognised priorities to achieve long term sustainability.

---

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

The paragraph states that developers will be required to contribute towards improvements, but fails to stipulate that any contributions/improvements must be fully justified, necessary in planning terms, and directly related in scale and kind to the development proposed.

---

### **Council Analysis**

The representation is that the Plan should include additional information on the contributions the Council may seek from developers as planning obligations.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to include this information within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

---

**Document:** LDP Strategy  
**Paragraph:** 6.38

**Section:** 6  
**Policy:**

**Page:** 028

---

### **Representation**

The paragraph states that developers will be required to contribute towards improvements through obligations and/or conditions. However, it fails to stipulate that any contributions/improvements have to be fully justified, supported by a full open space assessment that determines need and demand, and must be directly related in scale and kind to the development proposed.

---

### **Council Analysis**

The representation is that the Plan should include additional information on the contributions the Council may seek from developers as planning obligations.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to include this information within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

---

**Document:** LDP Strategy  
**Paragraph:** 6.83

**Section:** 6  
**Policy:**

**Page:** 035

---

### **Representation**

This paragraph discusses the issue of Caerphilly and the Southern Areas "overheating" in terms of economic progress and negative environmental effects. The Preferred Strategy states that Caerphilly and its surrounding areas are the most attractive areas for investment and suggests providing land for employment but restricting housing development, even on brownfield sites. If we discuss the term overheating, this Preferred Strategy has the potential to add significantly to "overheating" within this area. If the appropriate amount of housing is not provided where it is in the highest demand, the housing market in the area may experience its own version of overheating, causing house prices to rise and the affordability gap (which is already a significant problem) to widen.

Again, if the appropriate amount of housing is not provided where new employment sites are proposed, the potential for land take up and actual investment may be compromised as the area becomes a less attractive prospect for new employment and would-be investors. This in turn may also put more pressure on unemployment and cause people to commute out to other areas of the County Borough (or even outside the County Borough) to search for work. If commuting increases, it will inevitably lead to overheating to the already congested traffic network. The Preferred Strategy states that it will be some time before major improvements to the traffic network are completed, therefore any strategy that has the potential to increase commuting in and out of areas that will be favourable in terms of investment, will put extreme pressure on the traffic network throughout the county borough, which will also have knock on effects to the environment and sustainability through increased pollution levels.

Considering the above, the HBF objects to the strategy on the grounds that it may have more potential to increase this "overheating" and may also have detrimental effects to the environment and the economic and social progress of the county borough as a whole.

---

### **Council Analysis**

The meaning of overheating in this context is that unchecked construction of housing in response to demand involves unsustainable land take and congestion issues. The Plan will seek to address demand where possible but contain land take and traffic movement by allowing for housing provision in less pressured areas.

---

### **Council Response**

The meaning of overheating in this context is that unchecked construction of housing in response to demand involves unsustainable land take and congestion issues. The Plan will seek to address demand where possible but contain land take and traffic movement by allowing for housing provision in less pressured areas.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy does not specifically describe a policy opposing the coalescence of two villages and preservation of a green wedge between them. The Strategy does appear to prevent ribbon development which I feel is undesirable.

---

### **Council Analysis**

The Preferred Strategy makes reference in Para 6.29 to the need to promote resource efficient settlement patterns. In order to achieve this a settlement boundary will be designated in order to promote the full and efficient use of land as well as prevent coalescence where appropriate and prevent fragmented and ribbon development.

The Council considers that as a result of development patterns and pressure there is a need to define and maintain both open spaces within urban areas and between settlements. The green wedge policy seeks primarily to prevent coalescence and to prevent any further development that would be detrimental to the integrity of the individual settlements.

The representation is concerned with the omission of reference to Green Wedges. The inclusion of a direct reference to green wedges in a strategy policy is considered inappropriate. Instead, area based green wedge allocation policies for each of the strategy areas have been included within the Deposit Local Development Plan, which seek to prevent the coalescence within and between settlements

---

### **Council Response**

A green wedge policy has been included within the allocations section of the Deposit Local Development Plan in order to prevent the coalescence of settlements and to protect the integrity of the individual characteristics of these settlements.

---

**Document:** Candidate Site  
**Paragraph:** 2.29

**Section:** 2  
**Policy:**

**Page:** 011

---

## Representation

### 1. PREFERRED AND ALTERNATIVE STRATEGIES

Section 2 of the Preferred Strategy is entitled 'National, Regional and Strategic Context'. The last sub-heading of the section is 'South Wales Aggregates Working Party -Regional Technical Statement'. Sand and Gravel aggregates within the county borough are considered under this sub-heading, yet paragraph 2.29 contains the only reference to the Nant Llesg coal reserve; which states:

2.29 Minerals Technical Advice Note 2 Coal Consultation Draft advises local planning authorities in respect of safeguarding of coal reserves. The Draft MTAN indicates that the Council should consult with the Coal Authority in respect of the potential economic viability of coal resource areas. Where areas are identified as a result of the consultation these should be assessed for safeguarding in the LDP. An area of land at Nant Llesg, Rhymney has been identified by the Coal Authority for further consideration (refer to Appendices Section 3). The Council has concluded that this site should not be safeguarded within the LDP because of detrimental impact on the emerging Tourism Strategy for the Heads of the Valleys area."

The section concludes with further paragraphs referring to sand and gravel aggregates.

The only reference to coal appears to be secluded within a sub-section that deals with aggregates. Whilst we feel that this cannot possibly be deliberate, it is irresponsible of the Authority to not have considered this valuable reserve more fully and to not have reported it within the published strategy in a clear and appropriate manner. The statement cannot possibly be attributed to the South Wales Aggregates Working Party as the strategy appears to purport. At the very least, the council should commission a similar report by a similar working party into coal resources within the county borough.

We find the statement at paragraph 2.29 alarming for a local authority based mainly over the South Wales coal field, as is confirmed by the Geology and Geomorphology section of the Scoping Report in your own Strategic Environmental Assessment Sustainability Appraisal. Given the repeated guidance in Minerals Planning Policy Wales and the draft MTAN-Coal, the dismissive statement at paragraph 2.29 of the Preferred Strategy simply cannot be taken to be anything less than irresponsible. We refer the Authority to the guidance of the above policy documents.

Section 11 of Minerals Planning Policy Wales is entitled "Ensuring Supply" and states:

"11. Each mineral planning authority should ensure that an appropriate contribution is made in its unitary development plan to meeting local, regional and UK needs for minerals, which reflects the nature and extent of resources in the area subject to relevant environmental and other planning considerations. For aggregates this should be done under the aegis of the North and South Wales Regional Aggregates Working Parties, whose role it will be to provide a regional overview of supply and demand (see paragraph 58). For other minerals particularly coal, it will be necessary to consult relevant organisations, including the Coal Authority, trade federations and mineral operators, together with other mineral planning authorities."

Whilst the Authority's strategy makes reference to aggregates to accord with this guidance, it appears that only lip service has been paid to coal.

Section 12 of Minerals Planning Policy Wales states:

"12. As minerals can only be worked where they occur, it will be necessary for agreement to be reached by groups of authorities to determine the contribution each should make to meet regional needs. The contribution that a resource could make to regional and UK demand must be taken into account, and policies which seek to meet only local needs or which rule out all forms of mineral working within an area will only rarely be acceptable."

If the Authority is intending to maintain a policy of such rare acceptability, it must surely be incumbent upon it to carry out the necessary in-depth consultations and provide adequate arguments in support of its case. There appears to be little or no evidence of this having been done.

Section 12 continues:

"The contribution of recycled waste materials should be taken into account where these can be used satisfactorily and realistically instead of primary land-won minerals, and the use of marine-dredged materials should be taken into account where this can be obtained in a sustainable way. However, these sources must not be relied upon to justify failing to adequately assess the potential supply of land-based resources and to safeguard potential primary land-won mineral resources for future generations."

In this regard, my company feels that Caerphilly has clearly failed to adequately assess the potential supply of coal in its area and is failing to safeguard the potential primary mineral resource at Nant Llesg for future generations.

Minerals Planning Policy Wales further emphasises the importance of doing so at Section 13, where it states under the heading of "Safeguarding":

"13. It is important that access to mineral deposits which society may need is safeguarded. This does not necessarily indicate an acceptance of working, but that the location and quality of the mineral is known, and that the environmental constraints associated with extraction have been considered. Areas to be safeguarded should be identified on proposals maps and policies should protect potential mineral resources from other type of permanent development which would either sterilise them or hinder extraction, or which may hinder extraction in the future as technology changes. The potential for extraction of mineral resources prior to undertaking other forms of development must be considered."

Caerphilly's strategy for the Local Development Plan is clearly deficient in this respect. Whereas there has been some consideration given to the protection of sand and gravel as aggregates along with a guarded suggestion of their protection, it appears that there is no similar provision for considering coal. It appears that it has already been decided to abandon the Nant Llesg reserve prior to any industry or public consultation process.

Minerals Planning Policy Wales considers 'Areas of Future Working' for 'Energy Minerals' at Section 15 and provides further advice for mineral planning authorities about the difficulties of planning to meet the needs for energy minerals:

"15. The demand for energy minerals is largely based on power generation and is difficult to predict long term because of the highly volatile nature of current world markets and prices. This uncertainty makes planning to meet the needs for energy minerals very difficult. There is also limited information about the resources that are likely to be commercially viable for extraction. Mineral planning authorities should therefore consider all available information on the extent of energy mineral resources. They must provide as much guidance in their unitary development plans as possible to indicate where it is likely to be environmentally acceptable for these resources to be worked. To achieve this degree of certainty, policies should state where such operations would not be acceptable and should provide unequivocal statements as to why, and should also provide a set

of clear criteria against which any future proposals will be assessed in those areas where there is a possibility of extraction."

This essential guidance recognises the difficulties in dealing with these matters and the limited information about resources likely to be commercially viable. However, rather than such difficulties and lack of information being justification for abandoning reserves, mineral planning authorities are advised to 'consider all available information on the extent of energy mineral resources'. Miller Argent (South Wales) Limited, as the mineral operator concerned, has offered and sought to discuss the Nant Llesg reserve as a candidate site for the Local Development Plan and has so far been declined an opportunity to properly do so. We also understand that the Coal Authority had only been involved prior to publication of the preferred strategy in responding to a conflicting planning proposal being considered on the Nant Llesg Reserve. This is hardly evidence of a responsible authority seeking to consider 'all available information'. As a candidate site, the Nant Llesg reserve is instead being prematurely disregarded and expressly abandoned in apparent favour of the doubtful socio-economic benefits of tourism. The benefits that tourism might bring to the Nation's economic needs and to those of the local economy cannot possibly be expected to compare favourably with those that could be gained by preserving and working this important and valuable reserve.

## 2. ENERGY REVIEW (MAY2007)

Chapters 4 & 5 of the Energy Review clearly identify the need for coal for power generation in the medium term. Aberthaw Power station, which coals in Nant Llesg are ideally suited, is carrying out a £200m refurbishment programme and fitting flue gas desulphurisation equipment to make it comply with the latest European emissions directive (LCPD). It is vital that the station maintains a secure and substantial indigenous supply of low volatile coal to burn as its demand can not be totally met from imported coals. The need case for protecting and securing such reserves is therefore even more important in this specific context.

## 3. CAERPHILLY LOCAL DEVELOPMENT PLAN

The Caerphilly Local Development Plan will cover fifteen years - 2006 to 2021, a period during which untold jeopardy could be caused to the Nant Llesg coal reserve if it is not protected. We have already seen one such factor in the granting of planning consent for the EC02 wind farm over the reserve. This was granted despite strong objections to the proposal from both ourselves and the Coal Authority. We believe such a decision should not have been made and that this coal reserve should be given the recognition it deserves.

The Preferred Strategy of the Local Development Plan does not mention specific candidate sites, yet there is already an apparent abandonment of the authority's responsibility for protecting coal reserves. This clearly has to be fully addressed and justified as being reasonable and sustainable at this early stage of the plan's development if it is to be retained within the Authority's strategy.

---

### **Council Analysis**

The Deposit LDP safeguards resources of coal and other minerals within the county borough in accordance with WAG guidance.

---

### **Council Response**

The Deposit LDP safeguards resources of coal and other minerals within the county borough in accordance with WAG guidance.

---

**Document:** SEA/SA - Scoping Report**Section:****Page:****Paragraph:****Policy:**

---

### **Representation**

The Scoping Report hasn't properly identified the issue of any need to protect aggregates and minerals for potential future working. It makes brief reference to potential future working in lists of issues at the close of certain sections, but the need to protect such reserves in line with Government Guidance is as much an issue to identify within the scoping report as is the actual potential working of reserves. Even if not worked within the plan period, the Strategic Environmental Assessment will need to consider the National need to protect such reserves for future generations.

---

### **Council Analysis**

Mineral and coal deposits are important issues for the Geology and geomorphology section of the Scoping Report. As such a plan outlining the known mineral reserves should be included in the Scoping Report. In respect of the coal deposits, with the exception of a small part of the south of the the county Borough, the County Borough is entirely underlain by coal deposits. Consequently it would not serve any purpose in identifying this fact as it neither indicates what areas have potential for coal operations, nor areas where environmental constraints would prevent such operations. In addition, reference to the safeguarding of unworked coal and minerals for now and future generations should also be included.

---

### **Council Response**

That the Geology and Geomorphology section of the Scoping Report be amended by

1 The inclusion of a map showing the known minerals deposits and the location of quarries within the County Borough

2 Paragraph G9 be amended to read as follows:

There are a number of aggregate extraction sites which are either active or have the ability to become active again. The largest of these active quarries are Gelligaer and Machen Quarries, the former extracting primarily pennant sandstone, and the latter limestone. Large scale open-casting for coal has historically taken place in the north of the County borough where outcrops are near the surface. Government guidance advises that mineral and coal deposits should be safeguarded from permanent development that would either sterilise or hinder their extraction by future generations.

---

**Document:** SEA/SA - Scoping Report

**Section:**

**Page:**

**Paragraph:**

**Policy:**

---

### **Representation**

The Assessment of Preferred and Alternative Strategies includes references to 'Energy'. However, no attempt has been made in this assessment to take account of the need to continue with the production of energy from fossil fuels until alternative energy resources are sufficiently well developed to replace them in their entirety. The assessment only makes reference to increasing the use of renewable energy sources. Whilst this might well be a preferred aim of many, it is unrealistic not to recognise the need to continue with the current regime that is currently sustained by fossil fuels until such time as it can be entirely sustained by such renewable sources. The transition has to be gradual and, at present, realistic expectations for renewable energy within the life of the proposed plan can only be in the order of between 10% and 25% of total energy needs.

Caerphilly is sitting on valuable energy reserves and Miller Argent feels that the present local plan assessment provides an unrealistic approach to sustainability.

---

### **Council Analysis**

The aims of the plan are to encourage the increased use of renewable energy and reduce the amount of energy used. It should be taken as read the majority of energy supply will be supplied through fossil fuel based sources, as is currently the case, and is in line with UK energy policy. A statement to this effect should be included in the baseline text of the scoping report.

---

### **Council Response**

Paragraph CF3 should be amended to read as follows:

"This can be implemented through three main themes, a change in the way that energy is generated moving towards new renewable sources, a change in the way that we use energy by seeking to minimise use, and, preparing for the changes that climate change is likely to bring by reducing vulnerability to the effects of climate change, e.g flooding, disruption to travel by extreme weather, however energy production is likely to remain predominantly fossil fuel based throughout the plan period."

**Document:** Candidate Site  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

## Representation

"We seek to set out our views on the Preferred Strategy and to relate those, wherever possible, to our client's interest in and promotion of the Ness Tar Plant site and adjoining land. The extent of the site is as shown on the plan attached to our client's letter to you of 23 March 2007, which plan is also appended to this letter. In order to relate the preferred strategy to Walters' proposal, we first give a brief description of the proposal itself.

### THE PROPOSAL

#### Concept

Walters' proposal is for a comprehensive residential-led development, which remediates and reuses a heavily contaminated, brownfield site and makes a substantial contribution to the local community by virtue of a number of benefits, chief among which is the completion of the south-eastern bypass to Caerphilly. The proposal represents a highly sustainable form of development, being well located in relation to local and regional public transport (both bus and rail), and close to the town centre of Caerphilly with its extensive range of shopping, employment, leisure, health and other community facilities. The proposal accords with the Welsh Assembly Government's policies for the regeneration of urban areas and for creating sustainable new communities.

#### Relationship to existing plan allocations

The site is located primarily on land that is already within the built-up area of Caerphilly and within the settlement boundary shown on the Proposals Map of the (unadopted) Council Approved Caerphilly Unitary Development Plan. It includes adjoining land, abutting the settlement boundary, which is required for access and enabling development. In the UDP the Tar Plant is already allocated for remediation and redevelopment (Policy D1(28) of the approved Council Approved Caerphilly Unitary Development Plan, April 2003). This cannot be achieved at present due to: (a) the lack of an appropriate access to serve new development on the site; and (b) the high cost of remediating this grossly contaminated site, which cannot be met solely by redeveloping the Tar Plant itself.

#### Enabling development

The part of the site that lies to the south of the Tar Plant and outside the settlement boundary is owned by the Plymouth Estate. Its inclusion in the scheme is essential for the following reasons:

- · It provides the clean capping material necessary for the remediation of the contaminated Tar Plant and avoids the necessity to otherwise import this material by heavy vehicles on the existing local highway network.
- · It provides the land necessary for the completion of the bypass.
- · It provides an income stream to balance the substantial cost of properly remediating and servicing the Tar Plant.
- · It provides the land necessary to access the proposed redevelopment, which cannot be satisfactorily accessed via existing public highways.
- · It provides land for effective landscape screening to integrate the development into its surroundings and to provide a setting for it.

#### · Access

The development would be accessed from north and south via a new road which would effectively complete the Caerphilly bypass. In the north, the access would be taken from a roundabout on the new road that serves the rail park-and-ride. This would be extended southwards, through a new tunnel under the existing railway line, across the Tar Plant and the Plymouth Estate land to join the A469 Mountain Road just south of the disused Nant-y-Calch Quarry. The cost of this major new highway would be borne by the developer at no cost to the public purse.

## THE VISION FOR CAERPHILLY COUNTY BOROUGH

Chapter 5 of the Preferred Strategy records the key policy issues that emerged from the development of the Community Strategy and refines the LDP vision statement.

### ■ · Key policy issues

The table below lists the ten key policy issues identified by the council and briefly summarises how Walters' proposal accords with and responds to them.

#### 1. Sustainability

The sustainability credentials of the proposal are based on:

- · Reuse of previously developed land
- · Remediation of a grossly contaminated site
- · Development of an urban edge (rather than remote countryside) site
- · Proximity to public transport, including the new rail park-and-ride
- · Proximity to a wide range of facilities and services
- · Job creation and accessibility to employment opportunities
- · Integral open space and recreation facilities
- · Removal of extraneous traffic and enhancement of the urban environment

#### 2. Good design

Good design is about not only the appearance of buildings, streets and spaces but also the efficient use of energy and other resources. The size, scale and location of the proposal are such as to offer opportunities for a best practice scheme of masterplanning, urban design, architecture and clean building technology.

#### 3. Clean, green, safe environment

The proposal is predicated on remediation and greening, transforming a contaminated site which carries risks to public health and safety into a clean new community. One of the important concomitants of the proposal is the removal of through traffic from existing residential and commercial environments that are blighted and made less safe by extraneous traffic.

#### 4. Health and social cohesion

In assessing the comparative merits of alternative patterns for accommodating necessary new development, the extension of existing urban areas scores highly. The proposal offers an outstanding opportunity to integrate new development into an existing community and to do so in such a way that supports and enhances existing facilities and services.

#### 5. Equal opportunities

The proposal provides opportunities to access quality new market housing and affordable housing. The site is easily accessible and is well related to both local and regional facilities.

#### 6. Green transport policies

The site is located so as to minimise journeys by private car and to maximise travel on foot or cycle and by public transport. It is probably the largest potential development site in the County Borough to offer these advantages in such a clear and unambiguous way.

#### 7. Provision of land

The site is large enough to make a substantial and meaningful contribution to the supply of housing land and to do so in a location that is sustainable and accessible by modes of travel other than the private car.

#### 8. Regeneration

Through its sustainability credentials, the proposal will make a major contribution to regeneration in the County Borough. The completion of the bypass will bring sub-regional benefits and will assist with regeneration in Caerphilly and elsewhere.

#### 9. Improved education facilities

The development will support existing education facilities and will meet any reasonably necessary requirement for enhancement.

#### 10. Caerphilly County Borough as an area in its own right

The proposal is of a scale and importance that will create an identity and contribute to the profile of the County Borough as a good place in which to work and live.

##### ■ · LDP vision statement

The council's vision statement emphasises three aspects that are particularly pertinent to Walters' proposal:

- o Strategic location The vision statement requires the LDP development strategy to "...capitalise on the strategic location of Caerphilly County Borough at the centre of the Capital Network Region." Walters' site is itself strategically located, being adjacent to Caerphilly town centre and at a gateway to the town, both by rail and, subject to the proposal, by road. It is also strategically located in relation to access by public transport and by alternative modes of travel.

##### ■ · Public needs and regeneration

The vision statement seeks to ensure that the needs of the public are met and that regeneration is delivered in a well-balanced and sustainable manner. The Walters' proposal responds to those needs by providing housing and ancillary facilities in a location and in a manner which is sustainable and supportive of the council's preferred strategy and will make a significant contribution to regeneration in the County Borough and to meeting the priorities and objectives set out in the Welsh Assembly Government's national planning policy ( Planning Policy Wales, Welsh Assembly Government, March 2002 and People, Places, Futures: The Wales Spatial Plan, Welsh Assembly Government, 2003)."

"

##### ■ · Role and function of settlements

The vision statement emphasises that regeneration should reflect the specific role and function of individual settlements. As the largest settlement in the County Borough, Caerphilly performs an important role as a shopping, commercial and administrative centre. Development of the site will enhance these roles, providing an enlarged catchment population within walking distance of the town centre and its facilities. Much of the spending power of this new population will occur locally, in both retail and other services, thus supporting the economy and vitality of the town centre.

#### DEVELOPMENT OPTIONS

Chapter 6 of the Preferred Strategy defines the strategy options that were considered (including the preferred strategy), records the strategy themes, looks at the roles of settlements in the County Borough and comments on how the preferred strategy reflects those themes and roles.

##### ■ · Strategy components or themes

Paragraph 6.4 records the eight strategy components or themes that were identified as a result of stakeholder consultations on the alternative strategies. The table below lists these and briefly summarises how Walters' proposal accords with and responds to them.

#### 1. Allow for development opportunities in the north

The proposal will not detract from or impede development opportunities in the north. It is complementary to them and the completion of the Caerphilly bypass will assist access to and development in the north. Development of the site will meet a local need for housing that cannot be satisfied in the north. The promotion of development opportunities in the north is necessary and desirable, but it is not a sustainable means of providing for development needs that arise in the south of the County Borough.

#### 2. Promote a balanced approach to managing future growth

The preferred strategy promotes a more balanced approach to managing future growth, in which development opportunities in Caerphilly are limited primarily to brownfield sites. Walters' proposal satisfies this theme by focusing on an important brownfield site (3 Paragraph 6.25 of the Preferred Strategy identifies the Ness Tar Plant as one of the most notable brownfield sites in the County

Borough) and by using only as much greenfield land as is essential to provide for access and enabling development. Paragraph 6.23 states that throughout the County Borough residential development opportunities will be targeted at settlements with good rail or bus services. The site is not only located within such a settlement but is also favourably located in relation to those services and such as to offer a choice of sustainable transport modes.

### 3. Exploit brownfield opportunities where appropriate

The site contains a large area of previously developed or brownfield land and the site therefore qualifies under this heading. It is especially appropriate that this particular brownfield site should be redeveloped:

- (a) because it is grossly contaminated and that contamination should be remediated; and
- (b) because the location of the site is such that it is an appropriate and sustainable focus for new development. Paragraph 6.26 states that brownfield sites will be allocated for development where their development would not have an adverse effect on the role and function of the County Borough as a whole, but that in the Caerphilly area the development of brownfield sites for housing will be resisted "...where their development will undermine the role and function of principal towns or key settlements where there is a need to reserve land for employment or urban facilities." The site was previously in industrial use, but that use is no longer appropriate for access and environmental/amenity reasons. The cost of remediating and servicing the site is so high that residential use is the only potentially viable and acceptable use.

### 4. Promote resource efficient settlement patterns

Urban area extensions are acknowledged to be settlement patterns a preferred means of providing for new development (see, for example, Michael Breheny, Tim Gent & David Lock, *Alternative Development Patterns: New Settlements*, HMSO, 1993). This is especially so where, as in this case, the site is accessible to both public transport and local facilities and services. The proposal avoids the adverse aspects of development proposals noted in paragraphs 6.29 and 6.31. The development would not constitute ribbon or fragmented development, would not contribute to coalescence and would not lead to town cramming. Paragraph 6.33 notes that the strategy will build on recent significant improvements to the strategic road network and "...will promote further improvements to ensure that the network as a whole functions in an efficient manner." The proposal envisages the completion of the Caerphilly bypass and therefore complies precisely with this intention. Paragraph 6.34 envisages a significant switch from car to rail and states that "...settlements with good access to existing and planned rail services will be favoured particularly for high density development." The site fits this criterion exactly.

### 5. Ensure development contributes towards the necessary infrastructure improvements

The proposal will provide its own infrastructure and this will include the completion of the Caerphilly bypass. This corresponds with the council's intentions set out in paragraph 6.37, which states that developers "...will be required to contribute (through Planning Obligations or directly) towards improvements to the strategic road network and other necessary infrastructure improvements, including improvements to the public transport system as an integral part of the Preferred Strategy."

### 6. Ensure development provides the necessary community facilities

The site is located so as to offer easy and sustainable access to existing facilities and services, which will be supported by the development. A large development such as that proposed is more likely to make a meaningful contribution to the provision and maintenance of community facilities than a large number of small developments.

### 7. Reduce the impact of development upon the countryside

The proposal entails the loss of an area of countryside abutting the settlement boundary. The incorporation of that land is essential for access and enabling development. This land can be developed without causing undue environmental harm and in such a way that the new development would be successfully integrated with the site's setting.

### 8. Target development to reflect the roles and functions of individual settlements

Paragraph 6.83 recognises the need for Caerphilly to continue to capitalise on its proximity to Cardiff and to continue to exploit the economic opportunities that this can bring. The council views the priority in this area as the redevelopment of existing sites rather than the release of "...any substantial new greenfield land." Walters' proposal accords with this, remediating and redeveloping a brownfield site, and using greenfield land only for access and enabling development.

#### ■ · Settlement roles

Paragraph 6.9 notes that the role and function of each settlement has been a significant consideration in the identification of sites for new development. Walters' site is located in the Caerphilly Basin Community Plan Area. Caerphilly is the principal town in this area (and indeed in the County Borough) and paragraph 6.90 notes that it plays an important sub-regional role in relation to shopping, employment, leisure and tourism. The same paragraph welcomes proposals for redevelopment which support this role in a way that is compatible with the strategy and policies of the LDP. It recognises the need for site allocations and suggests that the emphasis should be to redevelop existing sites. Walters' proposal accords with this strategy.

#### STRATEGIC POLICIES

Chapter 7 of the Preferred Strategy sets out a list of strategic policies. Those policies of particular relevance to the Walters' proposal are:

- · SP1 Sustainable development strategy
- · SP3 Protection policy
- · SP5 Climate change
- · SP6 Allocation for population growth and housing land
- · SP8 Transportation
- · SP9 Community infrastructure and affordable housing
- · SP10 Town centre hierarchy

The Walters' proposal accords with each of these named strategic policies and does not detract from any of the other strategic policies."

---

### **Council Analysis**

"It is acknowledged that when assessed against the Preferred Strategy, Ness Tar, as a brownfield site close to Caerphilly town centre, accords with the strategy. However, as part of the site assessment process, sites must also be considered acceptable for development with regards to a number of issues, including access.

The representor recognises that development to the site cannot be achieved at present due to the lack of an appropriate access, with the development relying on the provision of a South Eastern bypass for Caerphilly. The Council has considered the options for a South Eastern bypass and, whilst the provision of the road has potential benefits of alleviating traffic congestion in Caerphilly town centre and linked air quality issues, there is insufficient evidence at the present time to justify the bypass on these grounds and therefore comprehensive investigation of the sources of the problem, and assessment of the alternative options will need to be undertaken. However it is important to ensure that whilst the necessary investigative work is underway, no development is permitted that could potentially prejudice the future alignment of a bypass. On completion of the work the Council will either seek to confirm the safeguarded route for the development of a bypass or will remove the safeguarded corridor from the Plan.

It is recognised that the allocation of the brownfield element of Ness Tar alone is unlikely to be viable, as access to the site without a bypass would be limited to significantly fewer dwellings than the site has capacity for. Furthermore, the allocation of the site may potentially impact on future development proposals including the bypass should a need be identified in the future. It is therefore considered most appropriate not to proactively allocate the Ness Tar site but to leave it within settlement limits to allow it to come forward should it become viable to do so in the future. Furthermore, there are sufficient other brownfield sites that area significantly less constrained in the Caerphilly Basin to meet housing requirements so it is not considered necessary to allocate the site for housing."

---

**Council Response**

That the term "Strategic Site" should continue to be restricted to those whose loss would jeopardise the successful implementation of the Preferred Strategy.

---

**Document:** LDP Strategy  
**Paragraph:** 8.6

**Section:** 8  
**Policy:**

**Page:** 041

---

### **Representation**

Paragraph 8.6 states: "The Council considers that there are no strategic sites in that the omission of any one of them would not jeopardise the successful implementation of the Preferred Strategy..."

This appears to us to be a rather restrictive view of the term 'strategic site', which we would prefer to see defined as a site, the development of which is important to the achievement of the Council's Preferred Strategy. Unless a less restrictive view is taken of the definition of strategic sites, there would be no criteria (other than size) on which to assess the relative importance to the strategy of candidate sites.

---

### **Council Analysis**

The representation is that Strategic Sites should be defined as those which are important to the achievement of the Council's Preferred Strategy, rather than those whose loss would jeopardise the successful implementation of the Preferred Strategy.

The proposed change of interpretation of the term "Strategic Site" is not considered helpful. For any strategy there will be a number of development sites that are important: for example, in general, the larger sites will be important. The more useful interpretation of the term "Strategic Site" is rather to identify those sites that are critical to the strategy.

The fact that there are, in the Council's view, no Strategic Sites in the Preferred Strategy is a reflection of the robustness of the strategy: the implementation of the Preferred Strategy can not be undermined by the failure to develop any single site allocation in the Plan.

---

### **Council Response**

That the term "Strategic Site" should continue to be restricted to those whose loss would jeopardise the successful implementation of the Preferred Strategy.

---

**Document:** LDP Strategy  
**Paragraph:** 8.6

**Section:** 8  
**Policy:** 6

**Page:** 039

---

### **Representation**

Strategic Policy SP6 identifies a target population of 180,000 by 2021, which corresponds to the regional apportionment referred to in paragraph 2.18. It is clear from paragraph 2.18 that the corresponding housing target figure is 9500 units and that is the figure that is also used in Strategic Policy SP6. In contrast, paragraph 8.6 identifies a growth range of 7500-9500 housing units, which is ambiguous and potentially confusing. Following the assessment set out in paragraph 2.18, and in compliance with Strategic Policy SP6, the lower end of this range should be ignored and the reference should be to 9500 units.

We support the implication in paragraph 8.6 that the sites to be allocated in the LDP "...should be more than capable of delivering the Preferred Strategy..." The figure of 9500 units is the housing target required to house a 2021 population of 180,000. So as to ensure that that figure is met – and to allow for the fact that not all allocated sites will be fully developed within the plan period – the capacity of actual land allocations needs to exceed the target figure of 9500 units.

---

### **Council Analysis**

The Preferred Strategy identified a range of possible future housing growth in the county borough of between 7,500 and 9,750 new dwellings over the Plan period: the representation proposes that the higher figure of this range should be considered as the minimum for which the Plan should make provision.

The Council considers that the levels of net in-migration implied by the higher figure are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The full justification for this decision is given in the Background Paper on Population & Housing (see Section 4).

---

### **Council Response**

That no change be made to the Plan as a result of this representation.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

There is very little attention in the strategy given to greenhouse gases. The LDP only mentions improving the energy efficiency of NEW developments. There is no mention of the existing CO2 production.

We assume the aim of the plan is to reduce the RISE in CO2 production by 10%. The LDP does not mention the CO2 produced by transport. The LDP is still talking of expanding the road network. If the plan's aims were to produce sustainable communities and to increase the use of green forms of transport, then expanding the road network would not be necessary.

Reducing the need to travel has been a requirement of all Local Authority plans for at least 10 years. In this respect the recent plans have been a failure. The LDP is based on the previous plans and offers little in the way of change.

---

### **Council Analysis**

The local planning authority have a duty under The Government of Wales Act 1998 to promote sustainable development in the exercise of its function. This includes, as a direct result of a number of documents produced by the Welsh Assembly Government in response to the Government of Wales Act, reducing all green house gases from all sectors. The aims and objectives of the plan all seek to promote sustainable development as the primary function of the plan.

However, in response to the transport issue and the lack of reference to CO2 emissions, a statement has been added to objective 16 of the deposit local development plan and it now reads "Reduce congestion and harmful emissions by minimising the need to travel, promoting more sustainable modes of transport and making the most efficient use of existing transport infrastructure."

CO2 levels are measured nationally at decreases or increases in levels of emissions above the 1990 base levels. Caerphilly's measurements in reference to the reduction in emissions will be based on the same principle. It is also worth nothing that CO2 is not the only green house gas that needs to be reduced in order to tackle climate change issues. All harmful emissions need to be reduced as a result of the plan and in the accordance with sustainable development principles.

---

### **Council Response**

The local planning authority have a duty under The Government of Wales Act 1998 to promote sustainable development in the exercise of its function. This includes, as a direct result of a number of documents produced by the Welsh Assembly Government in response to the Government of Wales Act, reducing all green house gases from all sectors. The aims and objectives of the plan all seek to promote sustainable development as the primary function of the plan. CO2 levels are measured nationally at decreases or increases in levels of emissions above the 1990 base levels. Caerphilly will set and measure its success in respect of green house gas emissions on the same 1990 base level principles.

In response to the transport issue and the lack of reference to CO2 emissions, a statement has been added to objective 16 of the deposit local development plan and it now reads "Reduce congestion and harmful emissions by minimising the need to travel, promoting more sustainable modes of transport and making the most efficient use of existing transport infrastructure."

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

The Greendoorstep is particularly concerned with the Caerphilly Basin, so from now on all reference to Caerphilly should be taken as meaning The Caerphilly Basin.

Caerphilly as a community cannot support itself in terms of employment, recreation areas, and health and education facilities. (There is a massive deficiency in all these areas.) It is necessary for most people to travel out of the area to work and for leisure purposes. The public transport facilities to destinations out of Caerphilly are poor, restricted and expensive. E.g. Bus fares to Cardiff Bay double as soon passengers cross the county boundary to Caerphilly. Most of Caerphilly is remote from a railway station. New employment sites in Cardiff and Newport are remote from the rail and bus network.

---

### **Council Analysis**

Caerphilly is the Principal Town in the Caerphilly Basin and it plays an important sub-regional role in relation to shopping, employment, leisure, and tourism. Proposals for development will be welcomed which support this role in a way that is compatible with the strategy and policies of the Plan. Appropriate allocations will be made within settlement boundaries to provide for this. As a significant employment location there will be a need to allocate land for employment use within the Caerphilly Basin. However the priority and emphasis will be to redevelop existing sites, including the town centre, to enhance its important role as a retail and employment hub.

Caerphilly town centre is an important retail area and offers an alternative to Cardiff for regular shopping needs. Policies CM 2.2, CM 4.10, CM 4.11, CM 4.12, CM 4.13, CM 4.14, and CM 5.3 encourage the development of a range of complementary uses, namely retailing, commercial leisure and office development. Policies EM 1 and EM 2 will allocate and protect, as appropriate, suitable employment sites. Collectively, these policies will ensure the creation of a diverse local economy for the benefit of the County Borough.

Bedwas has maintained a strong industrial base and the village accommodates two large successful industrial estates at Bedwas House and Pant Glas totalling approximately 61 hectares. The area will continue to provide such sites, via Policies EM 1 and EM 2.

Proposals to enhance Bedwas Workmen's Hall and improve the surrounding area are part of a developing role for the village in the provision of cultural and recreational facilities for the Caerphilly Basin. The area could have tourism potential given its close proximity to Caerphilly Castle and to Caerphilly Town Centre.

The redevelopment of Bedwas Colliery will have a significant impact on the future role and function of Bedwas and Trethomas in this regard. This large brownfield site offers an opportunity to expand the residential role of Bedwas and also provide associated community and leisure facilities to further increase the attractiveness of the area. The redevelopment of the site would require substantial highway improvements to be undertaken in the area. It is envisaged that a new access road will be provided under Policy TR 7.

There is also an opportunity to exploit the village's riverside location by developing a riverside park from an existing area of woodland meadow situated between Bedwas and Trethomas. Policy TM 1 sets aside Rhymney Riverside Walk in Bedwas for tourism use.

Llanbradach, Abertridwr, Senghenydd, Trethomas, Graig y Rhacca, Waterloo, Rudry and Draethen are primarily residential settlements. Llanbradach is the only area served by a railway station and a major park and ride facility is planned there under Policy TR 4.

Land is allocated at the former paintworks at Waterloo for a housing development comprising 545 units. This represents an opportunity to help fulfil the housing needs of the County Borough's population through the redevelopment of a brownfield site. Provision will also be made for a primary school that will aid community development within the Rudry / Waterloo locality.

There is a need to establish more effective and transparent links to the public transport system in order to access Caerphilly Town Centre and the surrounding area. There is also a need to ensure that the strategic road network is upgraded at key locations, in order to ensure ease of movement within and beyond the Caerphilly Basin Area.

Caerphilly is only 17 minutes by train from the centre of Cardiff. This is an extremely important economic advantage that the Plan will seek to exploit. Road and rail links to Cardiff are particularly important as they serve not only local movements but also the massive commuter flows from further north in the Rhymney Valley.

3.187 However the need to facilitate travel patterns within Caerphilly town must be tempered by environmental considerations, particularly in respect of air quality where some areas are failing air quality standards. A sustainable transport system for Caerphilly must ensure that travel patterns are accommodated whilst air quality within the built up area is improved. The Council are currently investigating measures to improve air quality within the Town Centre that will inevitably include some transport measures.

---

### **Council Response**

The representors concerns are addressed in the Deposit Plan.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

The basis for distributing housing amongst the different areas of SEWSPG is flawed. Previous house building rates should not be taken into account. Past building rates in an area may have been unsustainable. Environmental capacity is a good indicator providing that affordable public transport access to employment is available or capable of being provided. Land availability should not be a factor in itself. Land should not be made available for housing if there is no environmental capacity.

Caerphilly has long exceeded its environmental capacity so no land should be available for house building. E.g. there is a deficiency of at least 75 % in all recreational areas.

---

### **Council Analysis**

The representation is that SEWSPG should reconsider its Regional Household Apportionment exercise, which should be based on environmental capacity rather than land availability.

It is accepted that the concept of environmental capacity is potentially valuable, but its use has not yet been established, certainly in this area. Regardless of its merits, the proposal to base the Regional Household Apportionment exercise on environmental capacity is impractical.

---

### **Council Response**

That no change be made to the Plan as a result of this representation.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

The level of housing provision identified in the Plan (9,500 dwellings or 650 dpa; para 2.18) is derived from "the provisional apportionment exercise" undertaken at the subregional level. It should be noted that the work of the SEWSPG has not been the subject of independent scrutiny or examination. The housing requirement will therefore need to be properly justified and tested in due course having regard to the advice in Planning Policy Wales (para 9.22).

It is noted that this housing requirement appears to imply an increase in the County Borough's population above that that would be achieved if a position of zero net migration were maintained. In effect the Council appears to be planning for net immigration over the plan period. The reversal of demographic trends reflects the improved economic fortunes and prospects of the County Borough and that regeneration initiatives have been successful in retaining and attracting population. Similarly, this assumption reflects the Wales Spatial Plan for the Network Capital sub area highlighted in para 2.5 - 2.8 of the Preferred Strategy document.

This positive approach to growth is welcomed. However to properly reflect the way in which the Plan intends to embrace growth the expression of the housing requirement as a "maximun" should be replaced with "at least". The figure of 9,500 should not be seen as a ceiling, rather a floor which can be exceeded if sustainable locations for new housing can be achieved, or if economic growth and performances increases at a rate greater than hitherto assumed and that co-location of new housing and employment is achievable.

It is also the case that improved community facilities and infrastructure (including transportation measures) can only be realistically achieved in conjunction with higher housing growth. Accordingly, the strategy must allow a degree of flexibility.

---

### **Council Analysis**

The Preferred Strategy identified a range of possible future housing growth in the county borough of between 7,500 and 9,750 new dwellings over the Plan period: the representation proposes that the higher figure of this range should be considered as the minimum for which the Plan should make provision.

The Council considers that the levels of net in-migration implied by the higher figure are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The full justification for this decision is given in the Background Paper on Population & Housing (see Section 4).

---

### **Council Response**

That no change be made to the Plan as a result of this representation.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

#### **NATURE OF REPRESENTATION**

. R.E. Phillips & Partners supports the inclusion of their land holding at Lower Ton-Y-Felin Farm, Crumlin, Candidate Site Reference - E149 for office development within the Candidate Site Register in accordance with the preferred strategy.

. The proposed site, as indicated within the 'Provisional LDP Candidate Site Assessment Summary', accords with the UDP and Sustainable Growth Strategies and supports the Preferred Strategy in particular the Balanced Future and Efficient Settlement Function components.

. In accordance with the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey to be undertaken in order to support the suitability of the site for office development.

---

### **Council Analysis**

The Council welcomes and notes support for favourable consideration of the site in its assessment against the preferred strategy. This site will be taken forward as an employment allocation in the Deposit Plan.

---

### **Council Response**

The comments have been incorporated in the site selection process for the Deposit LDP.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at the rear of Oakdale Terrace, Penmaen, Candidate Site Reference - E167 for residential development within the Candidate Site Register.

The proposed site is located within the Mid Valleys Conurbation and accords with paragraph 6.77 and the overall objectives of the Preferred Strategy. The development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The inclusion of the site would play a role in the regeneration of the valleys as in accordance with Paragraph 6.22. Furthermore, although the site is currently designated as part of a Green Wedge in the UDP the main objective of Green Wedge designations is to prevent the coalescence of settlements. However, it is unclear as to the exact function of the Green Wedge in this area for the land in question does not lie between nearby settlements that are at threat of coalescence. The development of the site would not unduly harm the surrounding countryside and in accordance with Paragraph 6.41 there could be potential for a part of the site to be released for landscape enhancement and biodiversity gain as result of development.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site itself is not suitable for development as it would constitute an unacceptable encroachment in the open countryside.

---

### **Council Response**

No change should be made to the Plan in response to this representation.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at Ty Mawr (North), Crumlin, Candidate Site Reference - E179 for residential development within the Candidate Site Register.

The proposed site is located within the Mid Valleys Conurbation and would contribute towards the required overall development within the area as outlined in the Preferred Strategy. As stated within paragraph 6.77 where there are suitable sites, residential development will be concentrated in the mid valleys conurbation. The development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The development of the site would not unduly harm the surrounding countryside and in accordance with Paragraph 6.41 there could be potential for a part of the site to be released for landscape enhancement and biodiversity gain as result of development.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey, landscape assessment and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site itself is not suitable for development as it would constitute an unacceptable encroachment in the open countryside.

---

### **Council Response**

No change has been made to the Plan in light of this representation.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners supports the inclusion of their land holding at Land East of Treowen Road, Crumlin, Candidate Site Reference - E166 for residential development within the Candidate Site Register in accordance with the preferred strategy.

The proposed site accords with the UDP, Urban Containment and Sustainable Growth Strategies as indicated within the 'Provisional LDP Candidate Site Assessment Summary' and therefore supports the over all Preferred Strategy.

In accordance with the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development.

---

### **Council Analysis**

The support for the favourable consideration of the site with regards to the conformity with the preferred strategy is welcomed. However, when the candidate site register was published it was highlighted that the initial results were provisional and may be subject to change as a result of new information. Further consultation with regards to the highways access into the site has indicated that it would not be suitable due to a lack of visibility and safe pedestrian access, and therefore, irrespective of the site's conformity with the strategy, it was not considered appropriate for the site to be taken forward for further consideration.

---

### **Council Response**

No change should be made to the plan in response to this representation

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding north of the A472, Newbridge, Candidate Site Reference - E181 for residential development within the Candidate Site Register.

The proposed site is located at the key settlement of Newbridge within the Mid Valleys Conurbation and would contribute towards the required overall development within the area as outlined in the Preferred Strategy. As stated within paragraph 6.77 where there are suitable sites, residential development will be concentrated in the mid valleys conurbation. Furthermore paragraph 6.21 supports the development of the site through outlining that more significant development opportunities on both brownfield and Greenfield sites are proposed for principle towns and key settlements.

Moreover the development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The site lies within the urban area of Newbridge, it is surrounded by residential development, major infrastructure and is in close proximity to major commercial land uses. The development of the site would not unduly harm the surrounding countryside and in accordance with Paragraph 6.41 there could be potential for a part of the site to be released for landscape enhancement and biodiversity gain as result of development.

The site provides an opportunity for an infill housing site within the urban area which can provide for local needs housing which can ensure the land supply is flexible and deliverable in order to provide for a range and choice of housing types in a range of locations.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey. Furthermore it is recognised that access is a key issue for the site and along with a traffic impact assessment an investigation into proposed access is to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site itself is not suitable for development as the site is considered that it is an important corridor in visual amenity terms along the A472, with the western part of the site being identified as an area to be retained as it is woodland.

---

### **Council Response**

No change should be made to the plan in respect of this representation

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at Hillary Rise, Crosskeys, Candidate Site Reference - E198 for residential development within the Candidate Site Register in accordance with the Preferred Strategy.

The proposed site is located within the Southern Connections Corridor - Lower Islwyn Area. Paragraph 6.83 notes that there is a need for the area to capitalise on the proximity to Newport and Cardiff however then states that priority and emphasis within the area will be on the redevelopment of existing sites. In Paragraph 6.86 it is noted that within the Risca - Pontyminster area there is an opportunity to provide new mixed use development on brown field land adjacent to the River Ebbw.

Whilst we support the use of development of previously developed land, it should be recognised that this is a finite resource and its availability in the Pontywaun/Crosskeys area has diminished significantly with the majority of sites being developed following allocation in the UDP. It is therefore considered that the LDP will need to identify suitable additional sites in the area in order to accommodate future housing growth. In reality, this can only be achieved by extending the existing settlement at suitable locations.

The candidate site currently lies outside of the UDP settlement boundary, which bounds the site to the north and west, and is undesignated. However to the north the site adjoins another field that is currently allocated as a Committed Housing Site (HC 39) in the UDP. The development of the site would not unduly harm the surrounding countryside and in accordance with Paragraph 6.41 there could be potential for a part of the site to be released for landscape enhancement and biodiversity gain as result of development.

Further benefit to the wider area would be provided through the development of the site. The potential drainage constraint can be overcome through investment brought forward through the proposed development which would improve the drainage situation for the wider area. It is also recognised that a highway access strategy is required and is currently being investigated.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site itself is not suitable for development on the grounds that the site is not suitable as access is a major constraint. Furthermore, part of the site has been identified as worthy of retention on ecological grounds, which means that the site cannot be taken forward as part of a comprehensive development with adjoining housing sites.

---

### **Council Response**

No change should be made to the plan in response to this representation.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding north of Crown Roundabout, Maesycwmmmer, Candidate Site Reference - E304 for road side commercial development within the Candidate Site Register.

The proposed site is located within the Mid Valleys Conurbation and accords with paragraph 6.77 and the overall objectives of the Preferred Strategy. The development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The inclusion of the site would play a role in the regeneration of the valleys while also significantly contribute towards the necessary infrastructure improvements to the A472 as in accordance with Paragraph 2.21,6.37 which highlight the general requirement for transport improvements and Paragraph 6.78 which makes specific reference to the requirements for upgrading through Maesycwmmmer. In addition there are currently no road side commercial facilities available along the A472 and the development of the site provides a unique opportunity.

The site is designated as Green Wedge (18) in the Caerphilly Unitary Development Plan (UDP) which seeks to prevent the coalescence of Maesycwmmmer with Pontllanfraith. However, it is not considered that the development of the site would lead to any greater perception of the coalescence of the two settlements. The site is also designated as a SINC CII - (84) 'Crown Roundabout Marsh', Pontllanfraith. However the SINC are currently subject to a review and it is important to note that the natural regeneration of the site has resulted in a change in the ecological characteristics and as such the previous butterfly habitat has diminished and been naturally replaced with scrubland, therefore the site should be removed from the SINC.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in accordance with the Preferred Strategy. However, in this instance the conformity with the Preferred Strategy is irrelevant as the site itself is not suitable for development because it is poorly related to other sites in the area, and is important in terms of ecological value.

---

### **Council Response**

No change should be made to the plan in respect of this representation

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at Gladstone Road, Crosskeys, Candidate Site Reference - E264 for residential development within the Candidate Site Register in accordance with the Preferred Strategy.

The proposed site is located within the Southern Connections Corridor - Lower Islwyn Area. Paragraph 6.83 notes that there is a need for the area to capitalise on the proximity to Newport and Cardiff however then states that priority and emphasis within the area will be on the redevelopment of existing sites. While in paragraph 6.86 it is noted that within the Risca - Pontyminster area there is an opportunity to provide new mixed use development on brown field land adjacent to the River Ebbw.

The site is currently designated as Green Wedge C14 (26) Newtown, Crosskeys and Wattsville in the UDP. However, the functional role of this allocation needs to be reviewed. The site lies within the urban area of Crosskeys, it is surrounded by residential development, major infrastructure and is in close proximity to major commercial land uses. Moreover it is not considered that the development of the site would lead to any greater perception of the coalescence of the settlements given that the site already has an urban character by virtue of the allotment buildings and infrastructure.

The site provides an opportunity for an infill housing site within the urban area which can provide for local needs housing. Indeed, whilst we recognise the overarching brownfield strategy it is important to ensure the land supply is flexible and deliverable in order to provide for a range and choice of housing types in a range of locations. It is also significant that the site is only partially used for Allotments while the rest has been abandoned by the Council. Development on part of the site would therefore facilitate investment for facilities on a longer term basis.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site itself is not suitable for development due to access constraints and the site's location within Zone C of the flood plain, where highly vulnerable development such as housing should be precluded. Furthermore, it is considered that the remaining allotments should be retained to serve local allotment needs.

---

### **Council Response**

No change should be made to the plan in response to this representation.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners supports the inclusion of their land holding at Old Pant Road, Newbridge, Candidate Site Reference - E293 for residential development within the Candidate Site Register in accordance with the Preferred Strategy.

The proposed site accords with the UDP, Urban Containment and Sustainable Growth Strategies as indicated within the 'Provisional LDP Candidate Site Assessment Summary' and therefore supports the over all Preferred Strategy.

Since the submission of the candidate site an outline application for residential development has been submitted to the Council. The application is currently being considered and it anticipated that the application will be determined and granted in due course.

---

### **Council Analysis**

The support for the favourable consideration of the site in relation to the preferred strategy is welcomed. The site is being taken forward as a housing allocation in Policy HG 1 of the Deposit LDP.

---

### **Council Response**

The representation has been taken into account in the preparation of the Deposit LDP.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at Boot Field, West of Main Raod, Maesycwmmmer, Candidate Site Reference - E189 for residential development within the Candidate Site Register.

The proposed site is located within the Mid Valleys Conurbation and accords with paragraph 6.77 of the Preferred Strategy. The development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The inclusion of the site would play a role in the regeneration of the valleys while also significantly contribute towards the necessary infrastructure improvements to the A472 as in accordance with Paragraph 2.21 and 6.37 both of which highlight the requirement for transport improvements. The development of the site also accords with paragraph 6.78 which makes specific reference the requirement for the improvement of the A472 through Maesycwmmmer.

The site is currently designated as Green Wedge in the Caerphilly Unitary Development Plan (UDP) which seeks to prevent the coalescence of Maesycwmmmer with Ystrad Mynach. However, it is not considered that the development of the site would lead to any greater perception of the coalescence of the two settlements. Furthermore the alignment of the A472 improvement works as stated within accords with paragraph 6.78 is still unknown and therefore the dismissal of the site for residential development would be considered as premature.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site (reference E171, although incorrectly referenced in the representors response as E189) is in accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site has been identified as not suitable for development. There are a number of reasons for this, the first being that the site lies within a green wedge within the UDP which seeks to prevent coalescence between the settlements of Maesycwmmmer and Ystrad Mynach. The sites lies within an open corridor between these two built up areas and it is considered appropriate for this green wedge to be taken forward within the LDP as a means of retaining the settlement identities of the two villages. The A472 is considered to be a defensible boundary and therefore it is considered that the release of this land to the west would be unacceptable as it would erode the open nature of this green wedge. In addition, the western part of the site is constrained by its location within a Zone C flood risk area where highly vulnerable development such as housing should be precluded. The eastern part of the site has also been identified as important in ecological terms through its inclusion within the River Rhymney Site of Importance for Nature Conservation. Having regard to all of these constraints, it is not considered that the site is suitable to be taken forward as an allocation within the LDP.

---

### **Council Response**

No change should be made to the plan in response to this representation.

---

**Document:** LDP Strategy  
**Paragraph:** 2.21

**Section:** 2  
**Policy:**

**Page:** 010

---

### **Representation**

To continue to achieve regeneration aims, particularly in the mid and upper valley communities and to achieve the full potential and contribution of such communities to the Network Capital there is a need to continue to enhance the transportation routes within the County Borough. In this regard we would draw attention to the continued need to resolve network constraints on the A472 particularly at Maesycymmer. As indicated in para 2.21, the Development Strategy will need to inform the next review of the Local Transport Plan to ensure a co-ordinated approach between transportation and land-use development.

---

### **Council Analysis**

The representation is concerned with the highway network constraints on the A472, particularly at Maesycymmer.

The Deposit LDP recognises the highways issue at Maes-y-Cwmmer, which will be further affected by the Cwm Du Junction / Maes-y-Cwmmer Junction road improvement scheme that is required to facilitate the hospital development in Ystrad Mybach.

The draft South East Wales Regional Transport Plan (RTP) also identifies the A472 Maes-y-Cwmmer dualling / bypass as one of the key problem areas of the regional road network, but it must be noted that the final RTP will not be adopted until next year (2009).

The Council is investigating the options for highways improvements in Maes-y-Cwmmer, but appropriate schemes will be included in future revisions of the LDP.

---

### **Council Response**

Appropriate highways improvement schemes for Maes-y-Cwmmer will be included in future revisions of the LDP.

---

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

In Paragraphs 6.37-6.39 it should be made more explicit that planning obligations will only be sought where they contribute towards the mitigation of development impacts and meet the test of the planning circular (13/97), and are not a more general source of local authority revenue raising. It should be recognised that flexibility will be required over the level of planning obligation that will be sought from the development of a brownfield site. Indeed, obligations should be adjusted to take account of high levels of abnormal development costs which could render a development uneconomic.

---

### **Council Analysis**

The representation is that the Plan should be more explicit in relation to planning obligations, and explain that planning obligations will only be sought if they meet the test of Planning Circular 13/97.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to identify the relevant Guidance within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 9

**Page:** 040

---

### **Representation**

We request that an additional point is added to policy SP9 which states "the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development".

---

### **Council Analysis**

The representation is that the policy in the Plan on planning obligations should state that the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development.

The planning obligations that the Council will seek to secure from developments will obviously always have regard to the economic viability of the development, and it is not considered either necessary or helpful to make this point within the Plan.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

We note the requirement for 9,500 new residential dwellings to 2021 which has been derived from the "provisional apportionment exercise" undertaken at the regional level. We also understand that this work has yet to undergo independent scrutiny or examination. The requirement will therefore need to be properly justified and tested in due course having regard to the advice in Planning Policy Wales (para 9.22). The Council appears to be planning for net in-migration over the plan period, which is a positive approach and is welcomed. However to properly reflect the way in which the Plan intends to embrace growth the expression of the housing requirement as a "maximum" should be replaced with "at least". The figure of 9,500 should not be seen as a ceiling, rather floor which can be exceeded if sustainable locations for new housing can be achieved. Moreover, a flexibility allowance of 10% should also be included as a safeguard should brownfield sites not be delivered at the foreseen rate.

---

### **Council Analysis**

---

### **Council Response**

---

**Document:** LDP Strategy  
**Paragraph:** 6.25-6.33

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

We support the reuse of brownfield opportunities where appropriate and the designation of settlement boundaries. Indeed, where existing employment land and premises are not considered to be suitable to meet the long term requirements of modern businesses and are sustainably located within settlement boundaries then alternative uses should be sought. Moreover, innovative, mixed use approaches to development should be found, particularly on brownfield sites which may have economic viability problems. The locational context of brownfield sites must also be considered and in particular adjacent uses and proximity to major public transport routes.

---

### **Council Analysis**

Some of the employment land allocated in the UDP will be deallocated, precisely because its viability for other uses is deemed to be greater. The requirement for employment development to be accompanied by infrastructural improvements and measures such as Green Travel Plans will bring about an increase in the accessibility of employment sites and enhance their viability.

---

### **Council Response**

No change required.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:** 021

---

### **Representation**

We support the preferred strategy which seeks to provide a hybrid approach to growth allowing for a development approach which is tailored to the needs of the various elements of the County. The importance of the south of the County and connections to Cardiff to the economic performance of the whole Borough should be reflected when detailed allocations are made.

---

### **Council Analysis**

The Council believes that the Strategy of the Deposit Plan, coupled with local policies and development allocations, reflect the best possible spatial balance of growth with conservation and protection.

---

### **Council Response**

The Council believes that the Strategy of the Deposit Plan, coupled with local policies and development allocations, reflect the best possible spatial balance of growth with conservation and protection.

---

**Document:** LDP Strategy  
**Paragraph:** 3.14

**Section:** 3  
**Policy:**

**Page:** 015

---

## **Representation**

### Employment

We note that the Employment Topic Paper indicates that the future employment land requirement will be based upon the Atkins Study on Employment Sites Supply and Market Appraisal (2006). Our understanding of this Study is that it identifies a significant oversupply of employment land compared with a limited future land requirement for growth to 2016. In taking this forward to a more detailed level it is important that a full and comprehensive review of both existing allocations and underused employment stock is undertaken.

We note that there are numerous existing problems within Caerphilly, most notably the high instance of out-commuting from the County to other areas, particularly along the M4 corridor. In order to reverse this unsustainable trend, there is a need for a high quality and competitive stock of employment land which meets the requirements of modern occupiers. Furthermore, any review of employment land should be based on the sustainability principles which are inherent within the LDP Preferred Strategy in order to promote a balanced disposition of land uses linked with existing land use patterns and sustainable transport infrastructure improvements.

We also note that future land requirements should be tailored according to particular sectoral forecasts, HM Treasury forecasts indicate that office based employment is forecast to be the largest growth sector in the future. Offices can be developed at a much higher density than industrial sites and this will have an impact upon future land requirements since developing an office building at 40% of the site area can accommodate around 400 jobs per ha as opposed to the assumption of 50 per ha across the board in the UDP. Moreover, it is likely that a significant amount of job growth will be within non B uses. As such consideration should be given to the contribution of retail and service sector contributions towards job growth.

---

## **Council Analysis**

The Employment Topic Paper is part of the Evidence Base supporting the LDP Preferred Strategy, but was not subject to consultation itself. The Atkins Employment Sites Supply and Market Appraisal study provides part of the evidence base for the the future assessment of employment sites and was prepared using ODPM guidance on Employment Land Review, as identified in paragraph 3.16 of the Preferred Strategy. The importance of ensuring that the Council has a supply of high quality and competitive employment land, including offices and retail/service sector premises, is recognised as important within the Employment Topic Paper and will be taken forward in relation to site specific consideration within the Deposit Plan. Some sites allocated and protected for employment development within the UDP have been left as 'white' land in the LDP in an effort to rationalise the portfolio of employment land, given the projected requirement over the plan period. However, in order to foster the growth of a healthy and diverse local economy, it is necessary to retain a relatively significant supply of allocated and protected land as proposed by the LDP. This will consist of a mix of large and small sites intended for varying ranges of use classes (business parks, primary sites and secondary sites) spread across the three strategy areas. Permitting sui generis uses where appropriate will complement the overall employment 'offer'.

---

## **Council Response**

No change required.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The following representations are made on behalf of our clients Duvan Management, Garran Lackers and Chris Howell Timber and Landscape Supplies.

You will note that candidate sites submissions were made for a number of individual sites within the area (refnumbers E287, E291, E292) we would ask that the Council consider the potential for the sites as part of one comprehensive scheme, as well as on their individual merits.

On behalf of our clients, we are in general support of the strategy. It seeks to provide a balanced approach to growth which is in line with national policy. Furthermore, we agree with the Council's proposals that within Caerphilly brownfield sites should form the priority for future development. Such sites provide an important resource for the identification of new proposals and new uses which are perhaps more relevant to the current and future role and function of Caerphilly.

It should however be noted that the use of planning obligations will need to be carefully monitored particularly with such a brownfield strategy. This is fundamental to the success of the strategy, the use of planning obligations associated with brownfield development will need to be carefully considered since costs can render a site unviable, as such planning obligations will need to be considered on a site by site basis. Moreover, all planning obligations should be in line with the policy test set out in circular 13/97 and Planning Policy Wales.

Further, we note the indication that employment land requirements will be based on the Atkins Report 2006. We are aware that this identifies a projected need for 42ha of employment land in Caerphilly. Whilst we recognise that there should not be any mathematical exactitude between likely employment led requirements and future supply so as to provide for choice and flexibility. We consider that a potential supply of 132 ha of allocated sites as identified in the Employment Topic Paper gives rise to an opportunity to regenerate / redevelop existing employment sites without harm to the overall provision of future employment land in the County Borough. Clearly this is an issue that will need to be addressed in more detail within the next stage of the plan.

---

### **Council Analysis**

The representation addresses three issues that related to the preferred strategy consultation. The first comment indicates support for the strategy in particular, the use of brownfield sites. The support for the preferred strategy is welcomed.

With regards to the second issue, the representation raises concerns that planning obligations need to be considered carefully to ensure the development of the site is viable. This issue has been considered within the preparation of the Deposit LDP, through the incorporation of national planning guidance including Planning Policy Wales and circular 13/97 on planning obligations. In addition, the Council has included a strategic policy on planning obligations, the reasoned justification of which identifies that obligations should be fairly and reasonably related in scale and kind to the development.

The third issue relates to the potential redevelopment of employment land, with the representor arguing that the potential supply of 132 ha of employment land compared to the projected need of 42 ha, as identified in the Atkins employment study, suggests that some existing employment land could potentially be redeveloped. In response to this, it should be noted that an over allocation of employment land is important in order to ensure that there is sufficient choice and flexibility. Those

sites identified as scoring less well as employment sites in the Atkins Study have been reassessed to determine their suitability for alternative uses through the candidate site assessment process.

---

**Council Response**

The issues raised have been fully incorporated in both the LDP Strategy and the site selection process.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:** 020

---

### **Representation**

In general we support the Vision Statement set out on page 20. However, we believe it could be usefully supplemented by inserting the following text after the first sentence: "It will contribute towards the successful achievement of the sub-areas' vision and strategy".

---

### **Council Analysis**

The representation is to amend the Plan's Vision Statement by adding "It will contribute towards the successful achievement of the sub-areas' vision and strategy" after the first sentence.

The Plan's Vision Statement was derived from the Community Strategy through a series of workshops with key stakeholders, as an integral part of the Pre-Deposit public participation exercise. The Vision Statement has thus been endorsed by the consultation procedures designed to ensure that consensus was achieved as far as possible throughout the preparation of the Plan. It is considered that it would be inconsistent with this process to amend the Vision Statement at this point without reference back to all of the groups that are responsible for it.

---

### **Council Response**

The Vision Statement has been derived from extensive participation of key stakeholders, and the consensus that has been achieved means that amendments at this stage are not feasible.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

## **Representation**

### Development Options

We support the blended strategy approach, and in particular the components and themes. Within this context, it must be recognized that land allocation will need to strike a balance between social, economic and environmental objectives. There will inevitably be circumstances where, to meet future growth needs, the present boundaries of the built area will need to be extended and areas of countryside required to accommodate development. Provided that this is achieved in a sustainable manner this will not cause harm to the Strategy. In particular, the allocation of Greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives.

We are aware of the conclusions of the previous UDP Inspector who, in generally supporting its Strategy, referred to the need to positively plan for growth in a number of settlements to widen choice in such locations and to reverse the spiral of decline and thereby recreate sustainable communities (para 1.5.23). It is apparent from para 2.16 that this reversal has partly been achieved with out-commuting having been arrested. The LDP's development strategy must continue to provide for opportunities for these communities to continue to grow, expand and evolve and for innovative development proposals being supported.

We support the identification of functional roles of settlements. It is important that the functionality of settlements is reflected in the approach adopted by the Development Strategy. In the regard, we support the Principal Towns identified as the Mid Valleys conurbation. Urban form dictates that a conurbation approach should continue to be adopted as distinct from a focus on individual settlements. A Strategy approach that seeks to provide significant development opportunities at the principal towns and key settlements in the Northern Connections Corridor in order to spread prosperity throughout the County Borough is unobjectionable.

The approach adopted to future development at Caerphilly is noted. Encouraging Regeneration within the urban area is acknowledged. To contribute towards the enhancement of the role and function of the Principal Settlements in the Northern Connections Corridor there will continue to be a need to improve community infrastructure and the transportation system as noted in para 6.33.

---

## **Council Analysis**

The Council notes and welcomes the support.

---

## **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

**Representation**

The need for development to contribute towards infrastructure investment (para 6.37) is acknowledged. There is synergy to be had between the location of new development in accord with the Preferred Strategy and contributions towards infrastructure. The allure of large-scale land greenfield releases in locations that would conflict with the strategy as presently expressed should not be pursued merely to increase planning obligations.

---

**Council Analysis**

The representation comments that greenfield land should not be released merely to secure planning obligations.

The Council agrees with this comment.

---

**Council Response**

This comment is noted.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at Heolddu, Pontllanfraith, Candidate Site Reference - E150 for residential development within the Candidate Site Register.

The proposed site is located within the Mid Valleys Conurbation and accords with paragraph 6.77 and the overall objectives of the Preferred Strategy. The development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The inclusion of the site would play a role in the regeneration of the valleys while also significantly contribute towards the necessary infrastructure improvements to the A472 as in accordance with Paragraph 2.21, 6.37 and 6.78 all of which highlight the requirement for transport improvements.

In relation to the above candidate site R E Phillips & Partners are currently investigating the development potential of the land at Heolddu in connection with golf course related development in conjunction with Brynmeadows Country Club. The development of a high quality and innovative golf course will contribute towards the general regeneration of the area and accord with the provision of community facilities as outlined within Paragraph 6.38 as well as a potential landscape enhancement and protection in accordance with Paragraph 6.41.

In addition, since the original promotion of the site the strategy has been reviewed. The area of housing proposed on the site will not be as extensive as previously proposed. Moreover access and egress from the site will be to Crown Roundabout only and highways investigations are proposed in order to support this.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the preferred strategy is irrelevant as the site itself is not suitable for development on the grounds of both access and the ecological value of the land.

---

### **Council Response**

No change should be made to the plan in response to this consultation.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

R.E. Phillips & Partners objects to the omission of their land holding at Pengam Road, Pengam, Candidate Site Reference - E183 for residential development within the Candidate Site Register.

The proposed site is located within the Mid Valleys Conurbation and would contribute towards the required overall development within the area as outlined in the Preferred Strategy. As stated within paragraph 6.77 where there are suitable sites, residential development will be concentrated in the mid valleys conurbation. The development of the site supports the Preferred Strategy in particular the allocation of greenfield land in the upper and mid valley areas is a legitimate proposition in the context of the Strategy's underlying aims and objectives. The development of this site adjacent to the existing settlement boundary would not unduly harm the adjoining countryside and it is consistent with Caerphilly's own disposal and development strategy of the former Bedwellty Comprehensive School to the north of the site.

The site is currently designated within the UDP as Green Wedge under Policy C14 (8) - Bargoed, Aberbargoed and Pengam, which seeks to prevent the coalescence of Britannia and Pengam with Cefn Fforest to the south-east. However, it is not considered that the sensitive development of this part of the site would lead to any significant coalescence of these settlements but instead would represent a logical rounding off of the settlement boundary as it is currently drawn in this area. In addition, the site is wholly contained to the south-east (towards Cefn Fforest) by Tyn-y-Pwll Wood such that the development of the site would not set a precedent for further erosion of the Green Wedge between Britannia and Cefn Fforest and should not form part of the adjoining SINC.

In light of the 'Provisional LDP Candidate Site Assessment Summary' R.E. Phillips & Partners are in the process of instructing a full ecological survey and traffic impact assessment to be undertaken in order to support the suitability of the site for residential development. The further information will be submitted in due course.

---

### **Council Analysis**

The representator argues that the site is in the accordance with the Preferred Strategy. However, in this instance the conformity with the Preferred Strategy is irrelevant as the site itself is not suitable for development. The reason for this is that access to the site would need to be obtained from the A4049 Pengam Road, but an access off this main road could not be justified to serve a development of such a small size (only 0.69ha). The designation of adjoining land to the east as a SINC means that the site cannot be extended to incorporate a larger area of land and therefore access is not considered acceptable. In addition, it is considered that the site is worthy of retaining its green wedge status as it forms part of a wider open area, which should be protected.

---

### **Council Response**

No change should be made to the Plan in response to the representation.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

Aberbargoed and District Hospital, (Site reference E142).

We write in response to the formal Preferred Strategy consultation and in particular relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the development of the site would accord with the strategic aims and objectives of the Preferred Strategy and support your recommendation for taking forward the site for further consideration. Acknowledging your recommendation to carry forward the site, we summarise the benefits and merits of allocating the site for residential development.

In accordance with the Preferred Strategy and national guidance contained within Planning Policy Wales, the site is an important resource in a very sustainable and sequentially preferable location. The development would create an efficient settlement pattern as advocated by the Preferred Strategy. The site is located within the settlement of Aberbargoed and occupiers of dwellings would be able to use existing infrastructure and services. The settlement would be regenerated by the economic investment, both in terms of the development of the site and the local spending of future occupiers. In addition, the site would contribute to the sustainable and effective operation of a network of settlements including Bargoed and Blackwood, both of which are identified as retail, leisure and employment centres.

Residential development would help to create balanced growth and reflect the role of the settlement. Indeed, the Preferred Strategy indicates that residential development will be concentrated on settlements including Aberbargoed, predominantly because of its access to the rail network. The public transport connections in the local area are excellent, and most notably, the site is within 500 metres walking distance of Bargoed train station which runs directly into Cardiff Central Station approximately every 15 minutes. Bus services running past the site include bus number 002 from Bargoed (Hanbury Square) to Merthyr Tydfil Bus Station. This service runs through Aberbargoed and operates hourly between 6.30am and 6.25pm, Monday to Saturday. Bus service 2A also runs near the hospital, this service runs to Blackwood Town Centre allowing the option for passengers to catch the 151 bus on to Newport. Bus numbers 538 and X17 run from Blackwood to Cardiff Central.

Being a brownfield site, surrounded by housing, there is low environmental capital and no known ecological interest. Moreover, the beneficial use of a redundant site would give effect to the sustainable reuse of an important resource and help to protect further greenfield land from development. The site is also within the existing settlement boundary. The retention of population in the local area and the balanced growth of the settlement would be helped by the residential development of the site.

Addressing issues of housing supply and creating a critical mass of population would help ensure the retention of local employers and services. The County Borough has experienced a declining population and the development of the site for residential purposes will help to safeguard local services and facilities such as post offices and bus routes. The residential development will also assist in serving the housing needs of the area. To conclude, the benefits of the site are considered to be:

- (i) Efficient use of an existing brownfield site,
- (ii) More housing for the community,
- (iii) Increase housing choice in the local community,

(iv) Regenerate the local community by creating a critical mass of population,

---

**Council Analysis**

The support for the assessment of the site in terms of its compatibility with the Preferred Strategy is noted and welcomed. The site has been taken forward as an allocation under Policy HG 1 of the LDP.

---

**Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

## Representation

Abertillery Hospital, Abertillery (Site reference E143).

We write in response to the formal Preferred Strategy consultation and particularly relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the site is not to be considered further due to highway visibility and the junction with Christchurch Road being poor. We are in the process of appointing consultants to consider these issues and will forward this information to you shortly. Given the extent of existing traffic flow at the site, and especially when the hospital operates at full capacity, we consider that the site should be taken forward for further consideration.

The development of the site would accord with the strategic aims and objectives of the Preferred Strategy as it is brownfield and would encourage growth in the north of the County Borough. The residential development would help to create balanced growth, providing housing in a residential area, close to higher order settlements that offer a greater range of services, facilities and employment opportunities. The development would also help support the more immediate services and infrastructure in the local area such as schools. The site would accord with the efficient settlement pattern that the Preferred Strategy seeks. The site is close to Newbridge which is identified as a key settlement and a focus for economic growth and shopping. As such, a range of services, faculties and employment opportunities exist in the local area.

The site is therefore sustainable but will improve further as a result of the proposed transport links including a new rail halt and park and ride.

Furthermore, given the sites location close to Blaenau Gwent the site should also be considered in the context of the reality of its location in the settlement hierarchy and network, which does not follow administrative boundaries. The site is closely related to Abertillery and would therefore make a positive contribution to creating an efficient settlement pattern.

The site is partly within the Aberbeeg settlement boundary, and the remainder of the site is previously developed, currently having hospital buildings on it. The site would form a logical and sustainable extension to Aberbeeg which would enable it to perform its role more effectively. The importance of this should be recognised when reviewing settlement boundaries through the LDP process. Some of the site is within the existing settlement boundary, whilst the brownfield element of the site is outside the settlement. We consider it appropriate to revise the settlement boundary to include all of the site, and make efficient use of the opportunity presented by the site.

The table below demonstrates the sites potential contribution to achieving the 8 themes identified by the Preferred Strategy.

- Development in North YES Housing growth in the far north of the Mid Valleys East area.
- Balanced approach to managing future growth YES Meets other objectives and represents a sustainable form of growth development. Diversify housing choice in the area.
- Exploit brownfield opportunities YES Brownfield site opportunities
- Promote efficient settlement patterns YES Part of the site is within the settlement boundary and patterns remainder is a brownfield site that would form a logical extension. It also encourages population growth in the north and would integrated with existing
- Contribute to infrastructure improvements YES Creates a larger population to make more efficient use of improvements services and infrastructure in the regeneration area.

- Provide community facilities NO Loss of hospital site. However, this is part of a wider strategy for the provision and delivery of health services. New development would help to sustain other existing local facilities.
- Reduce impact of development YES Use of a brownfield site and site within the settlement on the countryside boundary.
- Development to reflect role of settlement YES The surrounding area is residential in character

The development would create an efficient settlement pattern. Towns in the Upper Valleys area provide a range of services and functions. For example, Bargoed is identified as a retail, leisure and employment centre. The No 52 bus travels in close proximity to the site, the service operates half hourly all week linking the site to Blackwood. Blackwood bus station then offers the 538 and X17 service to Cardiff Central and the 151 bus service to Newport. The nearest train station can be found in

Bargoed, which is 3.5 miles from Abertillery Hospital. This train service runs directly into Cardiff Central Station approximately every 15 minutes.

Numerous educational facilities are within walking distance of the site and would be available to new residents. Primary Schools within the area include Trinant Primary School and Brynhyftyd Primary School. Secondary Schools within close proximity of the site include Abertillery Comprehensive School, Oakdale Comprehensive School and Newbridge Comprehensive School. There are also a number of local shops within 1,000 metres walking distance of the site including Brynithel Post Office, several convenience stores, an off license and a bakery. There are also a couple of pubs within walking distance of the site. The Pen-y-Fan Country Park is also located in close

proximity to the site. Leisure facilities are available in the area; they include Abertillery Sports Club and Newbridge Leisure Centre. There are a number of doctor's surgeries and dentists available within the area.

The retention of population in the local area and indeed, the balanced growth of local settlements would be helped by the residential development of the site. Addressing issues of housing supply, a critical mass of population would be created that would help ensure the retention of local employers and services. This balanced growth is all the more important, as the site is located within the north of the Borough and this part of the County Borough has experienced a declining population. The development of the site for residential purposes will help to safeguard local services and facilities such as post offices and bus routes. The residential development will also assist in serving the housing needs of the area.

To conclude, the benefits of the site are considered to be:

- Efficient use of an existing brownfield site,
- More housing for the community,
- Increase housing choice and address affordability in the local community,
- Regenerate the local community by creating a critical mass of population,
- Assist the regeneration of the Heads of the Valleys area,
- Protect the countryside from development, and
- Sustainable location. extension.

---

## **Council Analysis**

The representation seeks to argue that the site is in accordance with the Preferred Strategy and therefore should be taken forward for further consideration. In the provisional Candidate Sites Register it was indicated that the site in question was unsuitable for development on highways grounds. Whilst additional information has been submitted to allay some of the highways concerns, it is not considered that housing development would be sustainable in this location due to its distance from any services and facilities.

In the assessment of the site against the component parts of the strategy, it is recognised that the site is brownfield and its development would reduce the need to release sites in the countryside as well as potentially contributing to infrastructure and community facilities. However, this

development is not located in the Heads of the Valleys Regeneration Area. It also would not reflect the role and function of Aberbeeg, considered too small to warrant a settlement boundary, or provide a balanced approach to future growth as development should be targetted to settlements that have the services and facilities to support them. Furthermore, it is not considered that development of this scale would be resource efficient as it will result in increased travel to schools, shops and other facilities. Consequently, it is not considered that the site accords well with the strategy and it is recommended that the site should not be taken forward as an allocation within the Plan.

---

**Council Response**

No change should be made to the Deposit LDP in light of this representation.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

Trethomas Health Centre, (Site reference E145).

We write in response to the formal Preferred Strategy consultation and in particular relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the development of the site would accord with the strategic aims and objectives of the Preferred Strategy and support your recommendation for taking forward the site for further consideration. However, the site assessment summary indicates that the site does not meet the objective of exploiting brownfield land. We consider that the site, which currently houses a healthcentre and areas of hardstanding, meets the definition of previously developed land and should be recognised as such.

In accordance with the Preferred Strategy and national guidance contained within Planning Policy Wales, the site is an important resource in a very sustainable and sequentially preferable location. The development would create an efficient settlement pattern as advocated in the Preferred Strategy. The site is located within the settlement of Trethomas and occupiers of dwellings would be able to use existing infrastructure and services. The settlement would be regenerated by the economic investment, both in terms of the development of the site and the local spending of future occupiers. In addition, the site would contribute to the sustainable and effective operation of a network of settlements including Caerphilly which is a principal town and Bedwas, a key town and which are identified as retail, leisure and employment centres.

Being a brownfield site, surrounded by housing, there is low environmental capital and no known ecological interest. Moreover, the beneficial use of a redundant site would give effect to the sustainable reuse of an important resource and help to protect further greenfield land from development. The site is also within the existing settlement. Residential development would help to create balanced growth and reflect the role of the settlement. Indeed, the Preferred Strategy indicates that Trethomas is primarily residential. Public transport joins up the residential area with Bedwas and Caerphilly. Buses n, cn, Cardiff to Griag-y-Rhacca, and the C79, Caerphilly to Griag-y-Rhacca go past the health centre. The number 50 also passes the site along Newport Road running in close proximity to Caerphilly bus and train station. This service allows passengers the option to travel by rail to Cardiff and Newport. The closest train station is located in Caerphilly, the railway station is served by trains on the Cardiff/Rhymney line. The train travels approximately every 15 minutes directly into Cardiff Central.

The sustainable development of a high density residential scheme at the Trethomas health centre site will help to create a critical mass of population that will create considerable local benefits. In a County Borough that is experiencing high demand for housing, the development of the site for residential purposes will help to provide more and improved local services and facilities. The residential development will also assist in increasing the supply and mix of housing as well as assisting in serving the housing needs of the area.

To conclude, the benefits of the site are considered to be:

- (i) Efficient use of an existing brownfield site,
- (ii) More housing for the community,
- (iii) Increase housing choice in the local community,
- (iv) Regenerate the local community by creating a critical mass of population,
- (v) Assist the regeneration of the Heads of the Valleys area,

- (vi) Protect the countryside from development, and
  - (vii) Sustainable location.
- 

### **Council Analysis**

The representation supports the provisional site assessment which indicates that the site conforms with the Preferred Strategy. However, in determining which sites go forward for inclusion in the Deposit LDP, it is not considered appropriate to take forward this site as it is still in use, and alternative sites within the Bedwas/Trethomas area that already have planning consent and/or are larger in size have been taken forward in preference. However, the site will remain within settlement limits and should it become surplus to requirements in the future, its redevelopment for an alternative use is likely to be acceptable in the future, subject to satisfying material considerations at planning application stage.

---

### **Council Response**

No change should be made to the plan in light of this representation.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### Representation

Ty'r Sirhowy, (Site reference E147).

We write in response to the formal Preferred Strategy consultation and particular relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the development of the site would accord with the strategic aims and objectives of the Preferred Strategy and support your recommendation for taking forward the site for further consideration. Being a brownfield site, surrounded by housing, there is low environmental capital and no known ecological interest. Moreover, the beneficial use of a redundant site would give effect to the sustainable reuse of an important resource and help to protect further greenfield land from development.

Acknowledging your recommendation to carry forward the site, we summarise the benefits and merits of allocating the site for residential development. The development would create an efficient settlement pattern. The site is located within the settlement boundary of Blackwood and in accordance with the Preferred Strategy and national guidance contained within Planning Policy Wales, the site is an important resource in a very sustainable and sequentially preferable location. The settlement would be regenerated by the economic investment, both in terms of the development of the site and the local spending of future occupiers. In addition, the site would contribute to the sustainable and effective operation of a network of settlements. Blackwood forms a cluster of settlements with Oakdale and Pontllantfaith.

The function of the strategic network of settlements and the Councils settlement strategy would be supported by the development of the site and occupiers of dwellings would be able to use existing infrastructure and services. Bus number 26 runs to and from Cardiff to Tredegar on an hourly basis, also the number 56 runs to and from Newport to Tredegar, also on an hourly basis. Both bus services run along Blackwood High Street, which is a short distance from the Ty'r Sirhowy Unit. The closest train station is located in Blackwood, which is approximately a mile from the hospital. The railway station is served by trains on the Cardiff/Rhymney line, trains travel approximately every 15 minutes directly into Cardiff Central.

The residential redevelopment of the site would help to create balanced growth and reflect the role of the settlement of Blackwood, which is a principal town and a focus for retail and employment growth. The provision of new dwellings in this predominantly residential location would create a sustainable settlement pattern by linking homes with jobs and services. The Ty'r Sirhowy site provides an ideal opportunity to promote an exemplar sustainable scheme. Indeed, the site has all the attributes of sustainability that are required by PPW. It is located on a brownfield site, along major public transport routes and is within walking distance of a range of local services and facilities. Moreover, it offers the opportunity to improve the supply and diversity of new housing stock and will contribute towards the critical mass of population required to sustain local services.

To conclude, the benefits of the site are considered to be:

- (i) Efficient use of an existing brownfield site,
  - (ii) More housing for the community,
  - (iii) Increase housing choice in the local community,
  - (iv) Regenerate the local community by creating a critical mass of population,
  - (v) Sustainable location, and
  - (vi) Protect the countryside from development.
-

**Council Analysis**

The representation supports the assessment of the site against the preferred strategy. This assessment has been taken into account in the selection of sites for inclusion in the LDP and the site has been included as part of a larger allocation with the adjoining ambulance station site under Policy HG 1.

---

**Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

Caerphilly Miners Hospital (Site reference E144).

We write in response to the formal Preferred Strategy consultation and in particular relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the development of the site would accord with the strategic aims and objectives of the Preferred Strategy and support your recommendation for taking forward the site for further consideration. The site is a significant brownfield opportunity in a very sustainable, urban location and we are keen to progress the site with you.

However, we consider that the site is best suited for residential use due to its location towards the edge of the settlement and the residential character of the surrounding urban area. Should the Council be minded to seek the mixed use development of the site, we consider that residential should be the dominant use at the site. We note the aim of the Preferred Strategy to promote Caerphilly's sub regional role for shopping and employment growth. However, this growth should be complimented by residential growth in order to create a more sustainable town and a more sustainable pattern of growth.

It is also important to recognise the acceptability of residential growth in Caerphilly at suitable sites such as this, because the location of retail and employment should be informed by national planning policy (e.g. town centre first and retail need policies). Many brownfield sites in Caerphilly will therefore be more suited to residential use and the Preferred Strategy should not restrict these sites from being reused.

We note that the site assessment-summary recommends looking at the site in combination with the adjacent site (D06) for highway reasons. We consider that there may be merit in looking at these sites in combination in order to create a more integrated and comprehensive development, but do not consider that the future allocation of Caerphilly Miners Hospital should be viewed by the Council as reliant upon the allocation of site D06. The hospital site forms a sustainable and logical allocation in

its own right. The site assessment form also suggests that the site would be better accessed via Cae Uwchlym. However, we disagree with this preference as development would place pressure upon Cae Uwchlym which is a residential road. This pressure would be even greater should mixed use development occur

at the site. Maintaining the existing access from the main road would ensure a better form of development by providing a more active street frontage to the main road. The creation of a high quality street frontage is even more important due to the high visibility of the site at its junction with St. Martins Road. Providing access from the main road would also increase the overall sustainability of the development as this would significantly reduce travelling distance to the town centre and the

nearby railway stations, rather than having to drive out to Caerphilly mountain and back into the settlement again. Furthermore, accessing the site via Cae Uwchlym would impact on the deliverability of a suitable brownfield site, as the suggested route crosses third party land.

The Preferred Strategy identifies Caerphilly as a principal town in the County Borough. This reflects the size, role and function of Caerphilly. The proposed development would strengthen this role by sustaining and enlarging the local population. Given the sustainability of Caerphilly, the continuing regeneration and growth of Caerphilly would accord with relevant planning policy. The site is within the urban area and would help achieve the Preferred Strategy aim of urban

containment in the Caerphilly area. The development of the site would also help to achieve the Strategy's aims in other areas, by offering the ability to absorb the Council's housing provision requirement, and therefore reduce the need for greenfield allocations which would result in the loss of countryside.

The site is brownfield, placing its development potential above greenfield sites. The Preferred Strategy outlines the key priority for Caerphilly as the need to develop brownfield sites and this accords with the aims and objectives of national policy. As stated in our previous representations, we believe the site to be extremely sustainable due to its brownfield status, location within the existing urban area of Caerphilly and close proximity to employment opportunities and the public transport network (rail in particular). Indeed we note the Council's conclusion that the site conforms with all the components of the Preferred Strategy except that it is not providing an opportunity in the North of the County Borough. However, it is important to recognise that the site conforms with the Preferred Strategy, as it seeks to develop brownfield land not in the south and helps to achieve the balanced growth of Caerphilly.

In summary, the site would contribute to the settlement pattern of Caerphilly, and indeed the wider pattern of settlements in the County Borough and South Wales. The site would make efficient use of previously developed land within the urban area of Caerphilly and integrate with the existing public transport network, services and infrastructure. The site would also fit into the wider settlement pattern, being in close proximity to bus and rail services that link with Cardiff and the region.

To conclude, the main benefits of developing the site predominantly for residential development are:

- (i) More housing for the community,
- (ii) Increase housing choice and address affordability in the local community,
- (iii) Regenerate and provide investment into the local community,
- (iv) Provide more housing in an area of significant retail and employment growth,
- (v) Create housing in close proximity to the public transport system, and the rail network connecting Caerphilly with Cardiff in particular, and
- (vi) Brownfield site within an existing settlement,

Given the Council's positive recommendation, we will now be seeking to address the key factors to bringing the site forward for development. We look forward to working with the Council to progress the sites development and would be happy to discuss the matter further.

---

### **Council Analysis**

The representation supports the assessment of the site against the preferred strategy. This assessment has been taken into account in the selection of sites for inclusion in the LDP and the site has been included as part of a larger allocation with an adjoining site under Policy HG 1.

---

### **Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

Ystrad Fawr, off Caerphilly Road (Site reference E240).

We write in response to the formal Preferred Strategy consultation and in particular relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the development of the site would accord with the strategic aims and objectives of the Preferred Strategy and support your recommendation to carry forward the site for further consideration for the development of a hospital. Acknowledging your recommendation to carry forward the site, we summarise the benefits and merits of allocating the site for a hospital. Being partly a brownfield site, the beneficial use of a redundant site would give effect to the sustainable reuse of an important resource and help to protect further greenfield land from development.

The site is also within the existing settlement. In accordance with the Preferred Strategy and national guidance contained within Planning Policy Wales, the site is an important resource in a very sustainable and sequentially preferable location. The development of a hospital at the site would reflect the role of the settlement and the vision of the Preferred Strategy. In the Strategy, Ystrad Mynach is outlined as a strategic centre for the location of public services, and the use of the site for a hospital would therefore accord with the Strategy. Indeed, the Strategy recognises that a new hospital will be built in Ystrad Mynach to serve the County Borough.

The development would create an efficient settlement pattern. Ystrad Mynach is at a strategic position at an intersection of road corridors and is therefore an ideal location for public service provision. PPW states that Local Planning Authorities should promote sustainable patterns of development, identifying previously developed land and buildings, and encourage development close to route corridors where accessibility on foot and by bicycle and public transport is good. Emphasis is placed on the location of development so as to minimise the need to travel, and increase accessibility by alternative modes of transport to the private car. A major locational factor of a hospital is accessibility, the position of the site on the main transport infrastructure being vital to its operation. Indeed, there are few sites within the County Borough that offer such a high level of accessibility, not just to residents of the Borough but also to the entire health catchment area.

As the site is located opposite the existing hospital site, it also has excellent access to major public transport routes as well as numerous local facilities including a number of primary and secondary schools, a number of health facilities and a variety of employment opportunities. Buses C9, C16 and C17 run in close proximity to the site to Caerphilly bus and train station, allowing passengers the opportunity to travel by train to Cardiff and Newport. Alternatively, the 50 service runs close to the hospital providing a direct bus service to Newport, while the number 26 also provides a direct service to Cardiff Central. The closest train station is located in Ystrad Mynach itself, the railway station is served by trains on the Cardiff/Rhymney line. The train travels approximately every 15 minutes directly into Cardiff Central.

The development of the site would help to achieve balanced growth. In a County Borough that has experienced population decline and is seeking to reverse this trend, the development of the site will help to provide improved health services and facilities and create a higher quality of life that can help attract people back to the area. Housing and employment investment in the County Borough will be complimented by this public sector investment into services.

Considerable social, economic and local benefits will be derived from the sites development. The facility would provide a high class health service for the area as well as a number of jobs, not only once it has been completed but also during construction. This will have significant benefit for the local economy, and offers potential for future 'spin off growth.

To conclude, the benefits of the site are considered to be:

- (i) Efficient use of a part brownfield site,
  - (ii) Job creation during construction in addition to health service jobs,
  - (iii) Significant investment in infrastructure to support housing and population growth,
  - (iv) Regeneration of the local area,
  - (v) Provision of purpose built, high quality health services for the community, and
  - (vi) Sustainable and strategically located site.
- 

### **Council Analysis**

The representation supports the assessment of the site against the preferred strategy. This assessment has been taken into account in the selection of sites for inclusion in the LDP as well as the granting of planning consent for a hospital on the site. The site has therefore been taken forward as an allocation under Policy CF1 of the Deposit LDP.

---

### **Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

---

### **Representation**

Ystrad Mynach Hospital, (Site reference E148).

We write in response to the formal Preferred Strategy consultation and in particular relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

We note the conclusions of the site assessment that the development of the site would accord with the strategic aims and objectives of the Preferred Strategy and support your recommendation for taking the site forward for further consideration. Acknowledging your recommendation to carry forward the site, we summarise the benefits and merits of allocating the site for sports and leisure development.

Being a brownfield site, the beneficial use of a redundant site would give effect to the sustainable reuse of an important resource. The site is also within the existing settlement. Sports and leisure development would accord with the role of the settlement and the vision of the Preferred Strategy. Ystrad Mynach is outlined as a strategic centre for the location of public services, and sports and leisure use would therefore accord with the Strategy.

The development would also create an efficient settlement pattern. PPW states that Local Planning Authorities should encourage development close to route corridors where accessibility on foot and by bicycle and public transport is good. Emphasis is placed on the location of development so as to minimise the need to travel, and increase accessibility by alternative modes of transport to the private car.

The development of the site would help to achieve balanced growth. In a County Borough that has experienced population decline and is seeking to reverse this trend, the development of the site will help to provide improved leisure services and facilities and create a higher quality of life that can help attract people back to the area. Housing and employment investment in the County Borough will be complimented by this investment into local services.

The site has excellent access to major public transport routes and local residential areas. Buses C9, C16 and C17 run in close proximity to the site to Caerphilly bus and train station, allowing passengers the opportunity to travel by train to Cardiff and Newport. Alternatively, the 50 service runs close to the hospital providing a direct bus service to Newport, while the number 26 also provides a direct service to Cardiff Central. The closest train station is located in Ystrad Mynach itself, the railway station is served by trains on the Cardiff/Rhymney line. The train travels approximately every 15 minutes directly into Cardiff Central.

To summarise, provision for public sports use at this strategic location will deliver significant community, lifestyle and health benefits. For example, facilities would be provided for young people and healthy lifestyles would be encouraged.

To conclude, the benefits of the site are considered to be:

- (i) Reuse of brownfield site within the settlement boundary,
  - (ii) Strategic location for the provision of sports and leisure use,
  - (iii) Significant investment in infrastructure to support housing and population growth,
  - (iv) Regeneration of the local area, and
  - (v) Provision of purpose built, high quality sports and leisure services for the community.
-

**Council Analysis**

The representation supports the assessment of the site against the preferred strategy and its proposed allocation for leisure/sports use . This assessment has been taken into account in the selection of sites for inclusion in the LDP, as well as the planning consent on this site for the relocation of playing fields as part of the new hospital development. The site has been included as a leisure allocation under Policy LE 4 of the Deposit LDP.

---

**Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

**Document:** Candidate Site  
**Paragraph:**

**Section:** 10  
**Policy:**

**Page:**

## Representation

Land off Brynhoward Terrace, T P Price, Oakdale (Site reference E146).

We write in response to the formal Preferred Strategy consultation and particularly relation to the above site. DTZ appreciates the eight components of the Preferred Strategy and commends the Vision of the Preferred Strategy.

However, we note from the relevant site assessment summary that the above site is not considered acceptable on the basis that access could only be achieved via allotment land. However, it would appear that there has been some confusion as the site can be accessed from the adjacent Redrow Homes site currently under construction and there is no allotment land to be lost. A photograph of the proposed access point is enclosed. A Transport Impact Assessment relating to the adjacent Redrow Homes development was submitted to, and approved by, the Council.

This Assessment demonstrated that there was sufficient capacity for the development and the future development of site E146. We are aware that some OS base maps identify allotments on the site but the enclosed photographs illustrate that there are no allotments at the site. Allotments do exist nearby, about 100m north west of the site. We therefore consider that the site is acceptable for further consideration and set out below how the site will help realise the themes of the Preferred Strategy over the LDP period.

The site is located within the settlement boundary of Oakdale which is part of the mid-valleys conurbation and within the northern connections corridor. Oakdale also forms a cluster of settlements with Blackwood, Crumlin and Pontllanfraith. The function of the strategic network of settlements and the Council's settlement strategy would be supported by the development of the site. Within the strategy Oakdale is promoted as a strategic employment location, therefore the development of the subject site for residential development would help to create balanced growth in the area, ensuring people can live within close proximity of the employment opportunities which will be generated by the development of the Oakdale Business Park.

Accommodating growth at the site would achieve a resource efficient settlement as the site is within the settlement boundary of Oakdale and it would also protect the open countryside from development by contributing to the total amount of development capacity within the urban area. The table below summaries how the residential development of the site would contribute to achieving the 8 themes identified by the Preferred Strategy.

- Development in North YES Encourages development in the Mid Valleys corridor. Helps diversify the housing stock.
- Balanced approach to managing growth YES Housing growth to meet future needs and in close proximity to the business parks. Would therefore be complimentary to the employment zone
- Exploit brownfield opportunities NO Whilst not brownfield, the site is of poor landscape quality and has signs of fly tipping and poor management and forms a logical infill within the settlement boundary
- Promote efficient settlement patterns YES Logical infill site that would form a sustainable urban extension. In close proximity to significant new employment zone and in an area identified for growth
- Contribute to infrastructure improvements YES Provide housing close to existing services in the town and also in close proximity to the thousands of jobs at the business park, thereby increasing

the efficient use of public services and public transport whilst reducing pressure on the road network.

- Provide community facilities YES New housing for the community, improved choice and affordability close to jobs and retail facilities
- Reduce impact on the countryside YES The site is within the settlement boundary, forms a logical infill and its development would help to protect better quality land
- Development to reflect role of settlement YES Surrounding area is residential in character and the development would also compliment nearby employment growth

Furthermore, whilst the development of the site for residential development is considered to accord with the themes of the Preferred Strategy, the development of the site is considered to be highly sustainable. The development of the site for residential use would help achieve the sustainable growth of the settlement and reflect the role of Oakdale. Blackwood is 2 miles away from the site and is identified as a retail hub in the Preferred Strategy. There are also a number of major employers within

Blackwood, which is a short distance from Oakdale. Employers include Arrowford Motor Company, Control Wise Limited, General Dynamics UK Limited, Musashi Auto Parts UK Limited, Oakridge Steel Limited, Thermomax (GB) Limited, British Airways Interior Engineering Limited and Nordam Europe Limited. Significant employment growth is already proposed in the form of over 100 hectares at the Oakdale Business Park. The residential development of the site would provide housing in close proximity to retail and employment opportunities and create a sustainable pattern of development within and between the cluster of settlements.

At a more local scale, the site would benefit from a range of local services in addition to employment and retail opportunities. Numerous educational facilities are within walking distance of the site and would be available to new residents. Primary Schools within walking distance include Rhiw Syr Dafydd Junior School and Oakdale Infants School. Secondary Schools within close proximity of the site include Oakdale Comprehensive School and Blackwood Comprehensive School, which is approximately 2,000 metres from the site. There are a number of local shops within 800 metres walking distance of the site including a number of convenience stores, take aways, cafe's and a florist. There are also a couple of public houses within walking distance.

In terms of open space, the area to the north of the site is an allocation for an informal recreation area. Leisure facilities are available in the area at Body Blast in Blackwood, Newbridge Leisure Centre and Unique Fitness Centre. There is a golf course in close proximity to the site, a football and recreation ground located 500 metres to the south of the site and allotment gardens close to the site. There are two churches available in the area for residents and a dentist surgery and a number of doctors surgeries within 200 metres of the site. Public transport links the site, local services and strategic services. Bus services 2B and 2C run past the site along Parkway and Bryn Howard Terrace to Blackwood. Blackwood bus station provides the opportunity for passengers to travel on the 151 bus to Newport, and the 538 and XI7 service to Cardiff. The nearest train station is located in Blackwood, which is served by trains on the Cardiff/Rhymney line. The train station is approximately 1 mile away from the site. Trains run from the station directly into Cardiff approximately every 15 minutes.

In summary the residential development of the site will help achieve the themes of the Preferred Strategy enabling sustainable development in Oakdale which will help to create a critical mass of population, creating considerable local benefits. This part of the County Borough has experienced a declining population and the development of the site for residential purposes will help to safeguard local services and facilities such as post offices and bus routes. The residential development will also assist in serving the housing needs of the area and compliment the recent employment growth by providing an increased pool of labour, thereby encouraging employers to locate at Oakdale Business Park.

To conclude the benefits of the site are considered to be:

- (i) Increase housing choice in the local community,
- (ii) Provide more housing in an area of significant employment growth,

- (iii) Regenerate the local community by creating a critical mass of population,
  - (iv) Regenerate the mid valleys corridor by re-addressing population flight and drawing spend into the local economy.
  - (v) Form a logical infill site within the settlement boundary.
- 

### **Council Analysis**

The representation argues that the site is in accordance with the Preferred Strategy and that the highways assessment of this site is incorrect as the site can be accessed from the adjoining housing site that has recently been completed. Since the Provisional Candidate Site Assessments were published, a planning application has been submitted on the site with the proposed means of access through the adjoining site being deemed acceptable. Consequently, the site will be taken forward as an allocation in policy HG 1 of the Deposit LDP.

---

### **Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:**  
**Policy:**

**Page:** 184

---

### **Representation**

Ruling out this site does not appear to have given full consideration to the points in justification in my letter of 18 Sept 2006 (copy attached). In particular development would be sustainable given its compactness & location in relation to the former Nelson railway station & the implications of policy T10(7) of the UDP.

Urban containment is justified as a logical extension of the Nelson settlement boundary. It would be resource efficient & have no significant countryside impact.

The land outlined in red on the attached plans is submitted as a proposed site for housing as part of your strategic assessment of LDP options. Briefly, the justification is as follows:

- 1 It would be an appropriate use of a site which is partly overgrown and underused
  - 2 It could not be classified as a genuine greenfield site
  - 3 It is adjacent to existing urban land and would be a logical extension of the Nelson settlement boundary
  - 4 It is well served by existing roads and bus routes
  - 5 It is immediately adjacent to the currently disused Nelson railway station identified for safeguarding in Policy T10(7) of the UDP
  - 6 There would be no physical or access problems
  - 7 It would not conflict with any UDP Countryside Policies
- 

### **Council Analysis**

The representation disagrees with the provisional assessment of the site against the component parts of the strategy for a number of reasons, with the representor arguing primarily that the site is not greenfield, would be a logical extension to the settlement as well as being well served by public transport and would not conflict with UDP countryside policies.

The views of the representor are not accepted. Considering each of the points in turn, the site would be classified as greenfield on the basis of the definition of previously developed land as set out in Planning Policy Wales, meaning that the site would not be considered to exploit brownfield opportunities. In relation to the second point, the site is segregated from the existing settlement by virtue of a cycle route and railway line, so would not be considered to be a resource efficient settlement patterns and would not limit the countryside impact. Whilst it is acknowledged that Nelson is well served by public transport, this in itself is not justification alone for the allocation for the land. UDP countryside allocations have been reconsidered as part of the LDP and the importance of the site in landscape terms is indicated by its inclusion with a Special Landscape Area within the Deposit LDP.

---

### **Council Response**

No change should be made in light of this representation

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

We assume that the Preferred Strategy has been prepared in accordance with the Delivery Agreement.

---

### **Council Analysis**

The Welsh Assembly Government wishes to confirm that the Preferred Strategy has been prepared in accordance with Caerphilly County Borough Councils Delivery Agreement.

---

### **Council Response**

The Council confirms that the Preferred Strategy has been prepared in accordance with the Delivery Agreement.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 2  
**Policy:**

**Page:**

---

### **Representation**

We note that Sections 2 & 3 of the Preferred Strategy provides the national, regional and strategic context for the LDP and refers to a number of the key relevant plans, policies and strategies: WSP, area WSP, Strategy for the Heads of the Valleys (HOV), Turning Heads, SEWSPG housing apportionment, proposed Regional Transport Plan, SEW Regional Waste Plan, SW Regional Technical Statement for Aggregates, Community Strategy Community Planning in Action '04; Local Partnership Strategies - environmental, regeneration, health, etc, education, Employment Sites appraisal, and proposed Local Housing Market Assessment.

The SEA/SA Part 1 Doc 2 also contains the review of Relevant Plans, Policies & Programmes.

---

### **Council Analysis**

The representation notes that Sections 2 & 3 of the Preferred Strategy provides the national, regional and strategic context for the LDP and refers to a number of the key relevant plans, and that The SEA/SA Part 1 Doc 2 also contains the review of Relevant Plans, Policies & Programmes.

---

### **Council Response**

The comment is noted.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy promotes balanced growth as described in the Wales Spatial Plan for the South East, and it is in keeping with the objectives of the Heads of The Valleys Regeneration Strategy.

---

### **Council Analysis**

The representation notes that the Preferred Strategy promotes balanced growth in line with both the Wales Spatial Plan and the Heads of the Valleys Regeneration Strategy.

---

### **Council Response**

This comment is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The impact of the inter-relationships between Caerphilly County Borough and adjoining areas is not clear. For example, it is clear that the southern part of the County including Caerphilly town, forms part of the greater Cardiff housing market. This results in a considerable amount of outcommuting from the southern part of the County Borough. Though there is some discussion in Section 6 of the functional inter-relationships with other areas, it is not clear if these have been adequately considered or quantified or that the strategies/aspirations of neighbouring authorities have been addressed (other than relying on initiatives underway as part of the Wales Spatial Plan area work).

---

### **Council Analysis**

The representation is concerned that the impact of the inter-relationships between Caerphilly County Borough and adjoining areas is not clear, nor that the strategies/aspirations of neighbouring authorities have been addressed.

Caerphilly is ahead of most adjoining authorities in the preparation of its LDP, and this necessarily limits the extent to which it has been possible to take account of the strategies of these authorities, although this has been done wherever possible. Numerous meetings have been held with adjoining local planning authorities however to discuss cross boundary issues and this work is reflected in the Plan.

In addition, there has been joint working, for example through the South East Wales Strategic Planning Group (Sewspg), with the other authorities in South East Wales, most notably on the Regional Household Projections exercise. Caerphilly County Borough Council was instrumental in setting up the LDP Pathfinder Group which seeks to secure co-operation between the local authorities in the region in the preparation of their LDPs, and has promoted joint working on many aspects of plan preparation, including for example Special Landscape Areas to ensure that a common approach is adopted.

---

### **Council Response**

The Council has taken other authorities strategies into account where possible, and has participated in joint working through both SEWSPG and the LDP Pathfinder Group. The success of these steps is inevitably limited by the different timetables authorities have adopted for preparing their LDPs.

---

**Document:** LDP Strategy  
**Paragraph:** 2.28

**Section:** 2  
**Policy:**

**Page:** 011

---

### **Representation**

Para 2.28 of the Preferred Strategy refers to the Regional Technical Statement (RTS) as informing the safeguarding process for aggregates. Whilst this may be an element of the RTS, the RTS is intended to ensure an adequate, sustainable, supply of primary aggregates. It will set out the contribution to be made by Caerphilly to the identified aggregates demand and the requirement for landbanks (see Paragraph 17 of MPPW and Paragraphs 45-50 of MTAN1 .

---

### **Council Analysis**

The representation is concerned that the plan should take account of the Regional Technical Statement (RTS).

The Regional Technical Statement became available in March 2008, and Caerphilly CBC has endorsed the document. The Deposit LDP has been prepared to take account of the RTS.

---

### **Council Response**

The Deposit LDP has been prepared to take account of the Regional Technical Statement.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

While the Preferred Strategy documents do refer to the Regional Waste Plan and the appendices provide the current information, the Preferred Strategy document does not interpret these into locally relevant strategy policies

---

### **Council Analysis**

The representation requests a Strategy Policy to state how much additional capacity or additional waste sites will be required in the county borough within the plan period.

The Waste Management Strategy Policy on Waste Management in the Deposit LDP indicates the additional capacity provision required, and the means of search by which such additional waste sites can be identified.

---

### **Council Response**

The Strategy Policy on Waste Management in the Deposit LDP meets the request of the representor, and indicates the additional capacity provision required and the means of search by which such additional waste sites can be identified.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP02

**Page:** 039

---

### **Representation**

LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area.

The draft strategic policies in the Preferred Strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1). Instead many of them, including Policy SP02 Good Design, are bland policy statements that fail to build on national policy or relate to the Preferred Strategy.

---

### **Council Analysis**

It is accepted that Plan policies should not re-iterate national policy but rather explain how they apply to the local area. The Council accepts the criticism with regard to this policy wording and the policy has been deleted from the Deposit Plan.

---

### **Council Response**

It is accepted that Plan policies should not re-iterate national policy but rather explain how they apply to the local area. The Council accepts the criticism with regard to this policy wording, and the policy has been deleted from the Deposit Plan.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP03

**Page:** 039

---

### **Representation**

LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area.

The draft strategic policies in the Preferred Strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1). Instead many of them are bland policy statements that fail to build on national policy or relate to the preferred strategy.

---

### **Council Analysis**

It is accepted that key strategic policies within the local development plan should not re-iterate national policy but rather explain how they apply to the local area. In relation to the strategic leisure policies, these have been expanded upon in the Deposit LDP to express the need to protect and enhance the specific leisure network and nature conservation sites of Caerphilly County Borough itself. These will aim to continue the theme of sustainability expressed in the Preferred Strategy, and specific reference has been made to strategic proposals within the County Borough, such as a significant new leisure centre for the northern valleys, and the range of sites that can form part of the Valleys Regional Park.

---

### **Council Response**

It is accepted that key strategic policies within the local development plan should not re-iterate national policy but rather explain how they apply to the local area. In relation to the strategic leisure policies, these have been expanded upon in the Deposit LDP to express the need to protect and enhance the specific leisure network and nature conservation sites of Caerphilly County Borough itself. These will aim to continue the theme of sustainability expressed in the Preferred Strategy, and specific reference has been made to strategic proposals within the County Borough, such as a significant new leisure centre for the northern valleys, and the range of sites that can form part of the Valleys Regional Park.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP04

**Page:** 039

---

### **Representation**

LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area.

The draft strategic policies in the Preferred Strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1). Instead many of them, including Policy SP04 Renewable Energy, are bland policy statements that fail to build on national policy or relate to the Preferred Strategy.

---

### **Council Analysis**

It is accepted that key strategic policies within the local development plan should not re-iterate national policy but rather explain how they apply to the local area.

The Strategic Policy on renewable energy in the Deposit LDP has been reworded to set out requirements for renewable energy technology and energy saving at the local level by setting phased targets throughout the lifetime of the plan. The county wide policy seeks to implement a sustainable building policy through the introduction of BREEAM and Code for Sustainable Home Standards and ratings. The standards set have been chosen on the basis of the Council's desire to set achievable and realistic targets for the county borough, having taken into consideration all other aspects and requirements of the plan and the geographical location and constraints associated with the area.

---

### **Council Response**

It is accepted that key strategic policies within the local development plan should not re-iterate national policy but rather explain how they apply to the local area.

The Strategic Policy on renewable energy in the Deposit LDP has been reworded to set out requirements for renewable energy technology and energy saving at the local level by setting phased targets throughout the lifetime of the plan. The county wide policy seeks to implement a sustainable building policy through the introduction of BREEAM and Code for Sustainable Home Standards and ratings. The standards set have been chosen on the basis of the Council's desire to set achievable and realistic targets for the county borough, having taken into consideration all other aspects and requirements of the plan and the geographical location and constraints associated with the area.

**Document:** LDP Strategy  
**Paragraph:** 1.3

**Section:** 1  
**Policy:**

**Page:**

### Representation

Para 1.3 of the Preferred Strategy document advises that the Preferred and Alternative Strategies have been subject to SEA/SA assessment and the Preferred Strategy is not the most sustainable though it has been modified (Section 9 of the document). Mitigation depends heavily on Policies SP1 and SP8

### Council Analysis

The SEA/SA assessment of the Preferred and Alternative Strategies included a ranking of the strategies in order of sustainability. The Preferred Strategy was not found to be the most sustainable strategy. Paragraph 9.8 of the Preferred Strategy consultation Document (pre-Deposit Consultation) addressed this issue and stated:

"However, Strategy Option D (The Hybrid Strategy) was preferred over Option C for the following reasons:

- I                The Hybrid Strategy was no worse than Option C, as it realised the same number of negative results in the assessment.
- II                The Hybrid Strategy can achieve a similar if not identical status in terms of sustainability that Option C can, if relevant changes and mitigation are made to the strategy.
- III                The Hybrid strategy has been produced through extensive and comprehensive public involvement, which identified the 8 key factors upon which the strategy is based.
- IV                The Hybrid Strategy represents the better option for maximising the opportunities that are likely to arise throughout the plan period.
- V                In accordance with the overall aim of the SEA/SA Assessment process, the Hybrid Strategy represents the better option for meeting the needs of the authority throughout the plan period in the most sustainable manner."

As identified in the above paragraph the Preferred Strategy is the most appropriate Strategy for the LDP as it is based upon public involvement that has identified issues facing the county borough and provided key points for the LDP to address as a result. Therefore the Preferred Strategy is more realistic and tailor made for the LDP than the other 3 strategies. In addition the assessment of the Preferred Strategy did not realise significant negative effects, rather it realised a greater number of neutral effects that required more information to accurately determine. As part of the Deposit LDP process the Preferred Strategy will be expanded and explained, as well as accommodating mitigation and changes recommended through the SEA/SA process. These changes will undoubtedly result in a strategy that is at least comparable to the sustainable settlements strategy, if not more sustainable.

It is considered that Paragraph 9.8 of the Strategy Consultation document provides sufficient justification for the inclusion of the Preferred Strategy in the LDP and, whilst the basic reasons could be amplified, it is not intended to review the Strategy Process in the Deposit LDP document. Consequently there is no appropriate vehicle for an exhaustive review of the decision to include the Preferred Strategy in the LDP and as such an amendment is not really possible.

### Council Response

No amendments be made in respect of this comment.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy and policies on minerals (coal and safeguarding) and waste do not meet the national requirements in PPW and MPPW and the relevant TANs as outlined in the detailed sections below.

---

### **Council Analysis**

The representation is concerned that policies on minerals and waste in the Preferred Strategy do not meet the requirements of WAG planning guidance.

It is accepted that there were discrepancies in the Preferred Strategy with WAG planning guidance on minerals and waste, and these have been rectified in the Deposit LDP.

---

### **Council Response**

The Deposit LDP complies with WAG planning guidance on minerals and waste.

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy aligns well with the emerging framework for strategic development in South Wales in terms of the roles and functions of hub settlements and the spatial sub sets - Heads of Valleys / connections corridor. Whilst the contribution to delivering the networked city region could be clearer, this is excused by the fact that consultation on this has not yet begun.

---

### **Council Analysis**

The Council has endeavoured to ensure that the Deposit Plan fully reflects the emerging Wales Spatial Plan framework for development in South East Wales.

---

### **Council Response**

The comment is welcomed and noted.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:**

---

### **Representation**

The overall Vision appears to be well integrated with the Community Strategy.

---

### **Council Analysis**

The representation is that the overall Vision of the Preferred Strategy appears to be well integrated with the Community Strategy (Section 3 of the Preferred Strategy document).

The Vision of the Preferred Strategy is derived from that of the Community Strategy, and one of the aims of the Preferred Strategy is to ensure the delivery of those parts of the Community Strategy that are reliant on the land use plan for implementation.

---

### **Council Response**

The comment is welcomed and noted.

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, what the plan vision is, what the plan objectives are, what strategic spatial options were considered and what the preferred spatial strategy is (see LDP Manual section 6.5).

---

### **Council Analysis**

The relationships between the strategy, vision and objectives have been made clearer in the Deposit Plan.

---

### **Council Response**

The relationships between the strategy, vision and objectives have been made clearer in the Deposit Plan.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 4  
**Policy:**

**Page:**

---

### **Representation**

Section 4 of the Preferred Strategy document refers to the "summary of key land-use issues" contained in the Preferred Strategy Appendices section 2. This "summary" list is 16 pages long and many of the issues bulleted are very general. It is not apparent that there is any subsequent analysis of this list of issues to provide a focussed small number of key critical land-use issues for the plan area that need to be dealt with by the LDP. This requires prioritisation, and there should be clarity of how the strategy and subsequent full plan has been focussed to deliver on them.

---

### **Council Analysis**

It is accepted that the structure of the Preferred Strategy was not as clear as it could have been in terms of the land use issues that need to be addressed and in terms of the linkages between the Vision, Objectives and Aims of the Plan itself. The Deposit Plan has been structured to make these clear and cross referencing has been provided to link the Strategy Policies as appropriate to the component parts of the Strategy of the Plan. In addition a clear focused list of land use issues is now provided.

---

### **Council Response**

The Council notes the comments made, and the Deposit LDP is structured to ensure that the requested linkages are clear.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:**

---

**Representation**

The LDP vision (page 20) is clear, as is the process for arriving at it.

---

**Council Analysis**

The representation endorses both the Vision in the Preferred Strategy, and the process by which it was achieved.

---

**Council Response**

The comment is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

It is not at all clear as to what the plan objectives are. These are fundamental to the construction of a sound plan. Paragraph 5.5 says the LDP "will" outline a series of key objectives; Appendices Section 4 lists a total of 24 objectives for the LDP (Le. those Community Strategy objectives with a land-use implication).

---

### **Council Analysis**

The objectives of the plan have been derived from land-use issues emanating from the four themes of the Community Strategy (Living Environment, Regeneration, Education for Life and Health, Social Care and Well-Being). Each of the key objectives outlined in the 'Introduction' to the plan contribute to the achievement of one or more of the aims of the plan, and also serve to address the eight component parts that realise the Vision and the Development Strategy of the plan. The Preferred Strategy was not as clear as it could have been in this regard, but the Deposit LDP clearly states what the objectives of the plan are.

---

### **Council Response**

The concerns of the representor have been addressed in the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Paragraph 6.99 refers to the "8 strands or objectives", which para 6.4 and the sub-heading at para 6.17 had given as "components" or "themes" of/for the Preferred Strategy. The setting of clear and SMART plan objectives is also critical for subsequent plan monitoring purposes.

---

### **Council Analysis**

The 'objectives' have been clarified in the Deposit LDP, and these are SMART orientated for subsequent monitoring purposes.

---

### **Council Response**

The 'objectives' have been clarified in the Deposit LDP, and these are SMART orientated for subsequent monitoring purposes.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

Section 6 is overly long and complex, with a confusing mix of description and policy.

---

**Council Analysis**

The description of the strategy has been simplified and better explained in the Deposit Plan.

---

**Council Response**

The description of the strategy has been simplified and better explained in the Deposit Plan.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The link between the evidence base compiled as part of the SEA/SA, monitoring of SEA targets, and the actual intent of the Preferred Strategy and the policies to deliver the preferred strategy is not always explicit, particularly in relation to environmental and infrastructure capacity.

---

### **Council Analysis**

The Council accepts this representation, and where possible the relationships between strategy, policies to deliver strategy, and the SA/SEA targets have been made explicit in the Deposit LDP.

---

### **Council Response**

The representor's concerns are addressed in the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

Generally the strategic policies do not appear clear or specific enough to deliver on the narrative contained in the preferred approach. For example, what does criterion 5 mean in terms of the narrative and how will tensions be resolved? The narrative acknowledges priorities for areas and potential tensions, but the policies do not shed light on how tensions will be resolved and what the priorities will be in particular areas.

---

### **Council Analysis**

Several of the draft strategy policies failed to be spatially specific in delivering the preferred strategy. These Strategy Policies have been amended to be spatially specific in the Deposit Plan.

---

### **Council Response**

Several of the draft strategy policies failed to be spatially specific in delivering the preferred strategy. These Strategy Policies have been amended to be spatially specific in the Deposit Plan.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy of dividing the County into distinct zones would appear to be a continuation of the spatial strategy which underpinned the Unitary Development Plan. The recognition that different parts of the County function in different ways, and that specific policies are required to address these areas, is well accepted. There does not appear to be much evidence of clear internal consistency between the major drivers of change in the County.

---

### **Council Analysis**

The representor considers that the Development Strategy which divides the County into distinct zones would appear to be a continuation of the spatial strategy, which underpinned the Unitary Development Plan. Whilst the LDP proposes to divide the county borough once again into three distinct strategy areas, the development concepts that underpin each of the strategy areas is significantly different to that of the UDP. For example within the UDP growth was targeted to the Mid Valleys Corridor, which was referred to as the 'Area of Growth', whereas within the LDP the strategy promotes a more balanced approach to managing future housing and employment growth. In the LDP, the development opportunities in the Southern Connections Corridor (SCC) and Caerphilly Town in particular are principally limited to brownfield sites as this strategy area is under the greatest pressure for development, and has only a limited capacity for further development without significant environmental impact. More significant development opportunities on brownfield and greenfield sites are proposed where appropriate for principal towns and key settlements in the Northern Connections Corridor (NCC) and the Heads of the Valleys Regeneration Area (HOV) in order to spread prosperity throughout the County Borough.

The LDP clearly recognises the major drivers of change within different parts of the County Borough and is now considered to be internally consistent. Furthermore the plan recognises the drivers for change outside of the County Borough boundary and recognises the impact that these will have on the county borough over the plan period.

---

### **Council Response**

The representors concerns are addressed in the Deposit LDP

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

There is a lack of evidence regarding the adequacy of the population assumptions; this in turn casts uncertainty over the adequacy of the supply of land for housing; which in turn leads to ambiguity about the provision of affordable housing. The preferred strategy does not fully make the connections between housing, economic development, transport and regeneration issues.

---

### **Council Analysis**

The representation is concerned with two issues: first, the scale of growth proposed in the Preferred Strategy ( in terms of both population and housing); and second, the connections between the proposals for housing, employment, and commuting.

The first issue is fundamental to the LDP, because the amounts of land allocations required in the Plan are directly related to the number of residents for which provision must be made: this is clearly true for the housing land provision in the Plan, and allocations for housing in the LDP will be far larger than those for any other land-use. The Preferred Strategy put forward suggested ranges for the future population levels in the county borough and the amount of housing land that will be required, to encourage respondents to give their views on the scale of growth that should provide the basis for the Plan. The Council has decided on the specific assumptions of future population levels and housing required to be incorporated in the Deposit LDP, and these decisions have been influenced by many factors.

Planning Guidance states that for the preparation of their LDP authorities should take as the starting point the regional (I.e. South East Wales, in the case of Caerphilly) household projections prepared by WAG. The South East Wales Strategic Planning Group (SEWSPG), which consists of the eleven planning authorities of the region, has carried out an exercise to disaggregate the WAG regional household projection to individual authorities. This Council has agreed to the Memorandum of Understanding on this exercise, and has included the resulting housing requirement figure in the Preferred Strategy consultation as the high point of the identified ranges. This implies a housing need for the county borough of 650 dwelling completions each year over the Plan period of 2006 to 2021, and an estimated implied population in 2021 of 180,000 (which compares with the 2006 Government estimate of 173,100).

It is normal for the minimum future population levels to be taken to be those of the current resident population, subject to only natural change, i.e., taking into account only forecast numbers of births and deaths, assuming no migration (or more accurately, zero net migration). On this basis it was estimated that the population of the county borough would rise to 174,000 in 2021, and that there would be a housing requirement of 500 dwelling completions each year. These figures were included in the Preferred Strategy as the low points of the identified ranges.

The Council considers that the levels of net in-migration implied by the higher figure are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The justification for this decision is given in 'Background Paper 6 Population & Housing' (see Section 4).

The population and housing figures used in the Plan must further take into account the second issue raised by WAG in this representation, namely, the connections between the proposed levels of housing and employment provision, and their implications for future levels of commuting. These issues are considered in the Background Papers on Employment and Transport.

---

**Council Response**

The Council has decided on the scale of population and housing growth to be incorporated in the Deposit LDP taking into account in particular WAG Guidance on the issue, the representations received in the Preferred Strategy consultation, and the local circumstances of the county borough. Justification of the proposals has been provided in the Background Papers on Population & Housing, Employment, and Transport to demonstrate the consistency of the proposals for levels of housing and employment provision, and their implications for future levels of commuting.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP01

**Page:** 039

---

### **Representation**

Strategic Policy SP1 is a set of objectives/themes and does not by itself lead to the implementation of the strategy. It repeats national policy and adds no local delivery mechanisms or local SA mitigation for the Preferred Strategy as identified in Appendix 9.

---

### **Council Analysis**

The representation is concerned that the Strategic Policies in the Preferred Strategy do not set out spatial distinctions in the approach to development for each area and type of settlement.

The Deposit LDP comprises three Sections:

Section A presents the Council's Development Strategy, which is based on dividing the county borough into three Strategy Areas, and the Strategy Policies that will deliver the Development Strategy over the Plan period.

Section B contains the criteria-based policies which apply across the whole of the County Borough, and against which development proposals will be determined.

Section C identifies for each Strategy Area those sites allocated for all types of development, and those areas that should be protected from development.

This structure ensures that the policies in the Deposit LDP, taken all together, do provide the local distinctiveness sought by the representor.

---

### **Council Response**

The Deposit LDP has fully taken into account the requirement for local distinctiveness in plan policies.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP08

**Page:** 040

---

### **Representation**

Strategic Policy SP8 repeats national policy contrary to the PPW Companion Guide, but could be related to Policy SP10 in terms of defining the strategic policy approach to local accessibility issues and proposed development in the defined areas of change in the Preferred Strategy.

---

### **Council Analysis**

In line with comments received, the Strategy Policy in the Deposit LDP that replaces Policy SP8 in the Preferred Strategy has been developed to set out spatial distinctions in the approach to development for each Strategy Area.

---

### **Council Response**

The representor's concerns are addressed in the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:** SP03

**Page:** 039

---

### **Representation**

Policy SP3 should be used as a strategic policy that sets out local areas of protection from change. See also comments below re historic conservation.

---

### **Council Analysis**

Strategic Policy SP3 has not been included in the Deposit LDP. The policy has been replaced by strategic policies that seek to protect specific aspects of the county borough from inappropriate or unsustainable changes. These include a policy on natural heritage protection, settlement identity, flood risk, and protection of leisure facilities. More specific policies have been included within the countywide and allocation sections of the plan. These set out specific sets of criteria relevant to the local area, and identify local designations and allocations to protect and enhance the county borough.

---

### **Council Response**

Strategic Policy SP3 has not been included in the Deposit LDP. The policy has been replaced by strategic policies that seek to protect specific aspects of the county borough from inappropriate or unsustainable changes. More specific policies have been included within the countywide and allocation sections of the plan. These set out specific sets of criteria relevant to the local area and identify local designations and allocations to protect and enhance the county borough.

---

**Document:** SEA/SA - Scoping Report  
**Paragraph:**

**Section:**

**Page:**

**Policy:**

---

### **Representation**

The SA Scoping Report (Geology and Soils) correctly identifies that the best agricultural soils lie in the south of the plan area, with a stated target of no loss of best and most versatile agricultural land. There is a good chance that this target is achievable.

---

### **Council Analysis**

The representation notes that SA Scoping Report (Geology and Soils) correctly identifies that the best agricultural soils lie in the south county borough.

The Scoping Report adopts a stated target of no loss of the best and most versatile agricultural land, which the representor considers that there is a good chance of achieving.

---

### **Council Response**

The comment is welcomed and noted.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The relationship of the Preferred Strategy to the safeguarding of minerals resources is not sufficiently clear (see below).

---

### **Council Analysis**

It is accepted that the Plan should identify areas for the safeguarding of minerals, and these have been incorporated into the Deposit LDP.

---

### **Council Response**

The Deposit LDP sets out safeguarding areas of minerals in accordance with WAG Planning Guidance.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

It is recognised that flooding has been taken into account and some flooding information may already exist but should the floodplain be a key area of implementation, its role in delivering strategy, should be clarified and be made explicit. Where the strategy relies on sites in the flood plain there may be a need to undertake some broad level assessment which provides for an understanding of flooding consequences to ensure that sites which are significant in terms of supporting the preferred strategy can be taken forward

---

### **Council Analysis**

Flood risk has been a key consideration in the preparation of the Deposit Plan, as one of the objectives of the plan is to 'reduce the impact of flooding by ensuring that highly vulnerable development is directed away from areas of risk wherever possible.' A Broad Level Assessment has been prepared which identifies how the precautionary principle advocated in national planning guidance to avoid development in the flood plain has been embraced in the LDP site selection process, providing justification for the allocation of those sites that have been taken forward and highlights the information available on those sites within zone C of the flood plain that have received planning consent. This Broad Level Assessment forms part of the evidence base for flooding and addresses the concerns raised by the representor regarding the evidence used to support sites in the flood plain.

---

### **Council Response**

This issue has been addressed in the evidence base for the Deposit LDP through the Broad Level Assessment and therefore no changes are required to the plan.



---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

National planning policy advocates that the implications of infrastructure capacity and/or requirements should be considered when identifying areas of growth. What is the current state of infrastructure capacity? How does the preferred strategy relate to public investment strategies such as water/sewerage/flood provision and protection infrastructure investment? What are the implications of the preferred strategy in terms of the level of investment required both now and in the future (over the lifetime of built development and the costs for the community in the longer term)? The strategy choice should encourage sites where provision exists and/or where problems can be solved and development can be phased. Therefore, the spatial implications of whether new provision is needed and whether, and how, it can be provided should be considered as part of arriving at (and providing justification for) the preferred option.

---

### **Council Analysis**

The current state of infrastructure capacity was an important factor in the selection of those site allocations which might meet the Plan Strategy, and due regard has been paid to this issue.

---

### **Council Response**

The current state of infrastructure capacity was an important factor in the selection of those site allocations which might meet the Plan Strategy, and due regard has been paid to this issue.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP09

**Page:** 040

---

### **Representation**

National planning policy advocates that the implications of infrastructure capacity and/or requirements should be considered when identifying areas of growth. What is the current state of infrastructure capacity? How does the preferred strategy relate to public investment strategies such as water/sewerage/flood provision and protection infrastructure investment? What are the implications of the preferred strategy in terms of the level of investment required both now and in the future (over the lifetime of built development and the costs for the community in the longer term)? The strategy choice should encourage sites where provision exists and/or where problems can be solved and development can be phased. Therefore, the spatial implications of whether new provision is needed and whether, and how, it can be provided should be considered as part of arriving at (and providing justification for) the preferred option.

Policy SP9 is too vague and should be used to rectify the local deficiencies identified above that would hinder implementation of the preferred strategy. See also suggestions re affordable housing policy

---

### **Council Analysis**

The current state of infrastructure capacity is an important factor in the selection of site allocations which meet the Plan Strategy, and due regard has been paid to the issue. The policy has been revised for the Deposit Plan and now specifies the differing infrastructural needs which may need to be met.

Appendix 20 of the LDP provides detailed information on the delivery of sites.

---

### **Council Response**

The current state of infrastructure capacity is an important factor in the selection of site allocations which meet the Plan Strategy, and due regard has been paid to the issue. The policy has been revised for the Deposit LDP, and now specifies the differing infrastructural needs which may need to be met.

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

We welcome the proposal to develop SPG on affordable housing.

---

### **Council Analysis**

The representation supports the proposal to prepare Supplementary Planning Guidance on affordable housing. This has been prepared to support the Policy on Affordable Housing Obligations within the Deposit LDP.

---

### **Council Response**

The support for the preparation of SPG on affordable housing is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The Preferred Strategy provides insufficient discussion about how and where affordable housing should be achieved and what type. The Local Housing Market Assessment and Housing Strategy for Caerphilly CBC are not yet available, and the Preferred Strategy document does not indicate when they will be available (page 16).

This should inform the evidence base for the detailed requirement for affordable housing, what type and where it would need to be located.

---

### **Council Analysis**

The Local Housing Market Assessment and Housing Strategy were not available at the Preferred Strategy stage and therefore these documents could not be taken into account. However, these documents have now been completed and have been integral in the development of policies for affordable housing, including affordable housing targets across the three strategy areas.

---

### **Council Response**

The documents identified by the representor have been fully considered in the preparation of the Deposit Plan and therefore this representation has been addressed. .

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP06

**Page:** 039

---

### **Representation**

Though it defines the overall level of housing provision to be achieved, Policy SP6 is not a spatial policy that shows how the figures and tenures will be delivered across the area. It also does not indicate the density assumptions that will underpin allocations

---

### **Council Analysis**

It is accepted that the policy as included in the Preferred Strategy stage does not describe the way in which the housing figures will be delivered across the three strategy areas and the proposed densities for housing development. However, in the preparation of the Deposit Plan, the distribution of housing has been considered under the area specific housing allocations policies for the three strategy areas, as well as within the Population and Housing Background Paper. It is therefore not considered necessary to repeat this information within the Strategy Policy itself in the interests of producing a concise LDP document which avoids unnecessary repetition, as prescribed in WAG planning guidance.

With regards to the densities used for housing development, full consideration has been given to average densities within the Population and Housing Background Paper. Where higher than average densities may be acceptable due to the proximity of housing sites to key transport nodes, this has been identified within sites-specific housing site detail in the Appendix to the LDP.

---

### **Council Response**

These views have been taken into account in the preparation of the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Employment: We note that consultants (Atkins) were appointed to do a sites and market appraisal. Assessments were based on a jobs requirement and a past trends basis. They have also undertaken to do a biennial survey/assessment of sites. In the Analysis Note there is no reference to an employment forecast although it does refer to ODPM advice. It refers to the potential for oversupply (on the basis of existing allocations). The proposed take up of existing allocations although very ambitious is not completely overstated. Though UDP employment sites have been subjected to a formal appraisal it is unclear in the text what the outcome has been in terms of confirmation of sites or allocation for other uses. Analysis of the economic linkages between Cardiff, the M4 corridor and the southern part of CCBC is weak. There is no reference to economic opportunities/threats and the influence that this has had on the strategy. There is little evidence that alternative economic scenarios or growth options have been considered. There is a strong impression that existing employment sites are being confirmed rather than alternative options considered and the strategy is highly concentrated on a few large sites -particularly Oakdale. The Preferred Strategy has a reliance on restraint in the south - Brownfield development and settlement boundary restraint - but the positive mechanisms to encourage development to divert to the north rather than elsewhere out of the area are not yet sufficiently considered. The "major conurbation" in the Northern Connections corridor is heavily reliant on, for example, take up at Oakdale. On this basis there should be emphasis on monitoring and management -a regular review of employment land take up and assessment of land use alternatives.

---

### **Council Analysis**

It is agreed that it is necessary to continually monitor and review the employment land included within the plan in order that the number and size of allocated and protected sites adheres to the amount of land required, based upon take up, whilst at the same time maintaining a portfolio of land with the flexibility to accommodate and foster a growing and diverse local economy. Work is being undertaken in this regard, in conjunction with other SEWSPG authorities, in order to devise a suitable mechanism for gathering and collating relevant data at the local authority level (similar to the approach used to ascertain housing land availability).

---

### **Council Response**

Systems for the monitoring and review of employment land are being devised.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

There appears to be limited consideration of retail and other forms of employment. Has there been an assessment of retail need and identification of gaps in provision that exist or will arise from the strategy? Are there key strategic retail sites that need identification or key settlements that need retail consolidation?

---

### **Council Analysis**

The retail requirements for the County Borough and their relationship to WSP key settlements for the region have been given consideration in the development of the Deposit Plan, and a retail need calculation contained in 'Background Paper 8 Retailing' supports the retail strategy adopted.

---

### **Council Response**

The retail requirements for the County Borough and their relationship to WSP key settlements for the region have been given consideration in the development of the Deposit Plan, and a retail need calculation contained in 'Background Paper 8 Retailing' supports the retail strategy adopted.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP07

**Page:** 040

---

### **Representation**

Policy SP7 has similar flaws to SP6 as noted above with the same remedy required. If there is a strategic policy (as per SP3) required to protect identified areas from other forms of development, it should be part of a revised SP7

---

### **Council Analysis**

It is agreed that a strategic approach is necessary and needs to be drawn up in relation to employment, including a specific figure relating to the amount of employment land needed over the plan period. It will be necessary to liaise with South East Wales partner authorities in order to develop a regional approach that can form the context for LDP work. The fact that there is a current lack of strategic direction locally is partly due to this vacuum at regional level.

---

### **Council Response**

The Deposit LDP contains policies on employment land that meet the requirements of the representor.

---

**Document:** LDP Strategy  
**Paragraph:** 2.27-2.31

**Section:**  
**Policy:**

**Page:** 010

---

### **Representation**

We note that the context for minerals is contained in paragraphs 2.27 to 2.31 of the Preferred Strategy document. However, it is not apparent that the interaction between minerals planning and other development has been addressed in arriving at the preferred strategy (paras 6.1 - 6.3) either as an identified LDP issue or as an objective. Neither is there a clear minerals strategy set out, and there is no reference to adjacent authorities other than through the Regional Technical Summary for aggregates.

Relevant national guidance is contained in Minerals Planning Policy Wales (2000) (MPPW), Minerals Technical Advice Note 1: Aggregates (MTAN1) and draft Minerals Technical Advice Note 2: Coal (MTAN2).

---

### **Council Analysis**

The Council acknowledge that relevant national guidance including Minerals Planning Policy Wales (2000) (MPPW), Minerals Technical Advice Note 1: Aggregates (MTAN1) and draft Minerals Technical Advice Note 2: Coal (MTAN2) must be adhered to in the preparation of the deposit plan

---

### **Council Response**

National policy on minerals is taken into account in the deposit plan. 'Background Paper 5 Minerals' explains the issues in more detail including the relationship between minerals and other development.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP12

**Page:** 040

---

### **Representation**

Policy SP12 on Minerals Safeguarding is not satisfactory as it does not accord with national policy for the following reasons:

(1) the caveat "where their impacts are acceptable" is not a requirement for safeguarding, as impacts may change with time and cannot be prejudged;

(2) the caveat "where appropriate" is not a requirement for safeguarding, as impacts may change with time and cannot be prejudged;

(3) the policy that no areas of coal and of sand and gravel are safeguarded conflicts with national policy (also see below);

(4) the policy does not refer to, nor safeguard, any areas of hard rock which is in conflict with national policy.

We note that safeguarding of minerals resources is not included as a consideration in the initial site assessment procedure (Appendices document section 8).

---

### **Council Analysis**

The representation is concerned that the Strategic Policy on Minerals Safeguarding in the Preferred Strategy does not accord with national policy. This is accepted, but the policies on Minerals Safeguarding in the Deposit LDP take full account of national guidance on the safeguarding of mineral resources.

---

### **Council Response**

The policies on Minerals Safeguarding in the Deposit LDP take full account of national guidance on the safeguarding of mineral resources.

---

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Waste: National policy in PPW and TAN 21 requires development plans to make adequate provision for a network of waste facilities. The Preferred Strategy documents do not provide any information on this; nor do they indicate there has been any assessment of alternatives.

---

### **Council Analysis**

The Strategy Policy in the Deposit Plan has been revised. It now details the required provision for waste facilities, and identifies the means by which this might be implemented, in line with the requirements of PPW and TAN 21. A full analysis is provided in 'Background Paper 4 Waste Management'.

---

### **Council Response**

The Strategy Policy on Waste Management in the Deposit Plan details the required provision for waste facilities, and identifies the means by which this might be implemented, in line with the requirements of PPW and TAN 21.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:** 11

**Page:** 040

---

### **Representation**

Strategic policy SP11 for waste does not set out a coherent strategy but just indicates what is currently happening in the Regional Waste Plans. Allocations may flow from this work but may not.

---

### **Council Analysis**

The Strategy Policy in the Deposit Plan has been revised. It now details the required provision for waste facilities, and identifies the means by which this might be implemented, in line with the requirements of PPW and TAN 21.

---

### **Council Response**

The Strategy Policy in the Deposit Plan has been revised. It now details the required provision for waste facilities, and identifies the means by which this might be implemented, in line with the requirements of PPW and TAN 21.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 4

**Page:** 039

---

### **Representation**

Renewable Energy - Strategic Policy SP4:

As drafted the encouragement of renewable energy to meet targets while protecting impacts on residential, amenity and biodiversity interests is considered to be a valuable objective. However, it is generic and not particularly related to the Caerphilly CBC area. While, paragraph 6.42, 6.53 includes mention of potential there is little certainty given in regard to renewable energy and little positive and proactive intent afforded through the policy. National Planning policy contained in MIPPS Renewable Energy (12.8.12, 12.9.1-2) and TAN 8 (5.1-3, 2.11-12) asks that authorities consider the opportunities which may exist for encouraging all forms of renewable energy and the contribution which they can make towards renewable energy targets and carbon emission reduction etc.

---

### **Council Analysis**

The renewable energy strategic policy has been reworded for the deposit local development plan in light of the received comments. The new strategic policy sets out requirements for renewable energy technology and energy saving at the local level by setting phased targets throughout the lifetime of the plan. A further strategic policy has been included within the plan that seeks to ensure all new development proposals contribute to creating sustainable places. This strategic policy includes a criterion that requires resources and energy efficiency to be incorporated into all new developments.

A county wide policy seeks to implement a sustainable building policy through the introduction of BREEAM and Code for Sustainable Home Standards and ratings. The standards set have been chosen on the basis of the council's desire to set achievable and realistic targets for the county borough, having taken into consideration all other aspects and requirements of the plan and the geographical location and constraints associated with the area.

The council have sought to integrate all the opportunities which may exist for encouraging all forms of renewable energy and the contribution which they can make towards renewable energy targets and carbon emission reduction through the above policies, as set out in the renewable energy MIPPS and TAN 8.

Protecting residential amenity and biodiversity interests is considered to be a valuable objective when considering renewable energy proposals. The strategic and countywide policies do not refer specifically to the protection of public amenity and natural heritage in the policy text. However, the reasoned justification of the policies highlight that the any development proposal for renewable energy technologies should take into account the impact it has upon public amenity and the natural heritage of the county borough.

---

### **Council Response**

Policy SP4 has been revised and the deposit local development plan now includes a strategic policy that sets out Caerphilly County Borough's specific requirements in regard to renewable energy production throughout the life time of the plan. A criterion within a placemaking strategic policy requires all new developments to incorporate resource and energy efficiency. A countywide policy sets further detailed requirements for new build developments and sets local targets in line with government guidance.

Protecting residential amenity and biodiversity interests is considered to be a valuable objective when considering renewable energy proposals. The strategic and countywide policies do not refer specifically to the protection of public amenity and natural heritage in the policy text. However, the reasoned justification of the policies highlight that the any development proposal for renewable

energy technologies should take into account the impact it has upon public amenity and the natural heritage of the county borough.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The PPW Companion Guide confirms that the range of policies for the protection of the historic environment contained in PPW (Ch 6) need not be replicated in the LDP

---

### **Council Analysis**

The Council agree that historic environment policies need not be contained within the local development plan due to its background in national policy. As such, policies referring to the historic environment have not been contained within the deposit plan. 'Background Paper 3 Historic Environment' provides the Council's consideration of this policy area.

---

### **Council Response**

The Council agree that there is no requirement to include historic environment policies within the deposit local development plan due to its background in national guidance.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 3

**Page:** 039

---

### **Representation**

Strategic policy SP3(3) does provide a general policy to protect "the quality of our built environment" which is ambiguous, as it is unclear whether the term is intended to refer to townscape and architectural environment or to the broader historic environment - paras 2.9 and 7.1 appear to apply the term differently.

---

### **Council Analysis**

Strategic policy SP3 has now been removed from the local development plan. The policy has been replaced by strategic policies that seek to protect specific aspects of the county borough from inappropriate or unsustainable development, including various aspects of the built environment. Specific policies have been included within the countywide and allocation sections of the plan, which deal directly with all aspects of the built environment. These policies and the reasoned justification behind them clarify the context of the built environment to which the policy relates. These policies set out specific sets of criteria relevant to specific forms of development, and in specific locations. There is no requirement to include a policy on the historic environment within the local development plan due to its background in national policy and legislation.

---

### **Council Response**

Strategic policy SP3 has now been removed from the local development plan. The policy has been replaced with more specific strategic, countywide and allocation based policies. The policies and the reasoned justifications for the policies clarify the context of the built environment to which it is referring. There is no requirement to include historic environment policies due to its background in national policy and legislation.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 11  
**Policy:**

**Page:**

---

### **Representation**

Section 11 of the Preferred Strategy document lists possible Supplementary Planning Guidance (SPG). One additional SPG refers to Constraints Mapping, and lists a number of examples of statutory constraints, including Listed Buildings and [Scheduled] Ancient Monuments.

---

### **Council Analysis**

The constraints mapping does not include Scheduled Ancient Monuments(SAMs) and Listed Buildings: the reason for this is twofold. Firstly it is difficult to depict and label both Listed Buildings and SAMs on the constraints map due to scale. Secondly, the Council concurs with the recommendation of the White Paper entitled 'Heritage Protection for the 21st Century', which proposes the establishment of a unified statutory Register of Historic Sites and Buildings of Wales, including Listed Buildings, Scheduled Ancient Monuments, and Registered Parks and Gardens. The Council believes that this register will prove to be a more useful point of reference to cover Listed Buildings, SAMs, and Registered Parks and Gardens. It is hoped that the unified statutory register would be produced in partnership with CADW.

---

### **Council Response**

The Council believes that a unified statutory Register of Historic Sites and Buildings of Wales would be more useful as a point of reference than the spatial expression of Scheduled Ancient Monuments and Listed Buildings on constraints maps. The Council would hope that the register would be produced in conjunction with CADW.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 2

**Page:** 039

---

**Representation**

Policy SP2 conflicts with PPW Companion Guide advice re repetition of national policy.

---

**Council Analysis**

The design policy has been deleted as it repeats national guidance.

---

**Council Response**

The design policy has been deleted as it repeats national guidance.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 5

**Page:** 039

---

### **Representation**

Climate Change -Strategic Policy SP5

The proposed policy does not establish a baseline for successful implementation and repeats national policy. It does not give an indication of what measures will be looked for and how and when they will be sought in relation to the preferred strategy. How the policy relates to SEA objectives on energy efficiency, carbon footprints is not explicit. The policy expresses only one aspect of the mitigation of climate change. Draft MIPPS Planning for Climate Change and Climate Change Compendium refer to other resources efficiencies/conservation, such as water, and how the design and location of development can enable mitigation of the effects of climate change and adaptation to the effects of a changing climate over the lifetime of development. It is not clear therefore that the impacts of climate change are fully integrated into the preferred strategy and that the strategy is capable of being responsive to this new agenda which necessitates taking account of the lifetime of settlements and new development.

---

### **Council Analysis**

Policy SP5 - Climate Change has been removed from the deposit local development plan. The council acknowledge that climate change issues are a broader issue that just renewable energy technologies and reducing CO2 emisisions. As such a revised strategic policy has been added to the deposit local development plan which deals only with the renewable energy requirements of new developments and sets out the Councils phased targets for renewable energy. A further strategic policy seeks to ensure that all development proposals contribute to creating sustainable places and includes a criteria for resource and energy efficiency and sustainable transport. A countywide policy has been included within the deposit local development plan that specifically seeks to imporove the quality of all new buildings and their contribution to reducing harmful emisisions and sustainable development.

The issue of climate change has sought to be integrated into all aspects of the deposit local development plan in line with duty imposed on local authorities by the Government Wales Act 1998, to take sustainable development fully into account when preparing local development plans. Climate change and sustainable development considerations have all been assessed under the strategic environmental assessments.

---

### **Council Response**

Policy SP5 - Climate Change has been removed from the deposit local development plan. A strategic policy that directly deals with renewable energy has replaced SP5, criterion associated with resource and energy efficiency has been included under another strategic policy and a countywide policy that directly deals with sustainable buildings have all been included within the deposit local development plan to take into consideration all of the points made in the representation.

---

**Document:** SEA/SA - Scoping Report  
**Paragraph:**

**Section:** 6

**Page:**

**Policy:**

---

### **Representation**

The SEA Scoping Report contains strong baseline data and sustainability objectives and indicators for the Cultural Environment. In its assessment of the implications for the LDP of Planning Policy Wales it also concludes that "The LDP must set out policy to preserve and enhance the historic environment. .. "

---

### **Council Analysis**

The representation notes that the SEA Scoping Report contains strong baseline data and sustainability objectives and indicators for the Cultural Environment and notes that the Scoping Report indicates that the LDP must "set out policy to preserve and enhance the historic environment. ..". 'Background Paper 3- Historic Environment' considers the issues of note in respect of the Historic Environment and concludes that sufficient guidance exists in national policy to protect and enhance the historic environment and that additional local policies need not be included within the LDP.

---

### **Council Response**

The comment is welcomed and noted.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** SP09

**Page:** 040

---

### **Representation**

Strategic Policy SP9 Community Infrastructure could impact on how growth will be managed throughout the plan period, and therefore on how objectives for the plan area are met. Further, the consideration of infrastructure as part of candidate site assessment is based on the assumption that it will be provided by developers, and appears to concentrate mainly on highway requirements.

Does the infrastructure picture have an impact on the proposed extension to residential areas? What infrastructure requirements are needed to enable delivery of sites that support the preferred strategy? This assessment of strategic sites should feed into a realistic strategic policy on planning obligations.

---

### **Council Analysis**

The current state of infrastructure capacity is an important factor in the selection of site allocations which meet the Plan Strategy, and due regard has been paid to the issue. The policy has been revised for the Deposit LDP, and now specifies the differing infrastructural needs which may need to be met.

---

### **Council Response**

The current state of infrastructure capacity is an important factor in the selection of site allocations which meet the Plan Strategy, and due regard has been paid to the issue. The policy has been revised for the Deposit LDP, and now specifies the differing infrastructural needs which may need to be met.

---

**Document:** SEA/SA - Scoping Report**Section:****Page:****Paragraph:****Policy:**

---

**Representation**

The issue of flood risk is identified in SEA/SA, and as part of site assessment methodology and seems to be carried through into site assessment. Paragraph 6.32 alludes to decisions with regard to the floodplain and the need to balance social and economic benefits. This doesn't go any further, however, than national policy and it isn't clear what ramifications these types of decisions will have in delivering the preferred strategy.

---

**Council Analysis**

Flood risk has been a key consideration in the preparation of the Deposit Plan, as one of the objectives of the plan is to 'reduce the impact of flooding by ensuring that highly vulnerable development is directed away from areas of risk wherever possible.' A Broad Level Assessment has been prepared ( Background Paper 13) which identifies how the precautionary principle advocated in national planning guidance to avoid development in the flood plain has been embraced in the LDP site selection process, providing justification for the allocation of those sites that have been taken forward and highlights the information available on those sites within zone C of the flood plain that have received planning consent.

This Broad Level Assessment forms part of the evidence base for the LDP and provides an explanation for the economic and social benefits of taking sites forward with zone C of the flood plain where the consequences of flooding is considered acceptable. Through this Broad Level Assessment, the issues raised by the representor have been considered.

---

**Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

There is no mention of any monitoring procedures, and, as the objectives are unclear and there are very few targets within the Preferred Strategy, it is not possible to envisage what meaningful indicators could be developed to monitor the effectiveness of the strategy and its delivery mechanisms.

---

### **Council Analysis**

The representation is concerned with the lack of information in the Preferred Strategy document on both proposed monitoring procedures, and the identification of indicators to monitor the Plan.

WAG Planning Guidance requires LDPs to specify monitoring procedures and meaningful indicators to be used as a basis for monitoring, and these issues have been addressed in the Deposit LDP.

---

### **Council Response**

The Deposit LDP details monitoring procedures and meaningful indicators as required by WAG Planning Guidance (see Introduction: Monitoring & Implementation, and Appendices 17-19).

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

There should be emphasis on employment development monitoring and management -a regular review of employment land take up and assessment of land use alternatives

---

### **Council Analysis**

It is agreed that it is necessary to continually monitor and review the employment land included within the plan in order that the number and size of allocated and protected sites adheres to the amount of land required, based upon take up, whilst at the same time maintaining a portfolio of land with the flexibility to accommodate and foster a growing and diverse local economy. Work is being undertaken in this regard, in conjunction with other SEWSPG authorities, in order to devise a suitable mechanism for gathering and collating relevant data at the local authority level (similar to the approach used to ascertain housing land availability).

---

### **Council Response**

Systems for the monitoring and review of employment land are being devised.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The SEA covers/contains evidence base from TAN 15 Development & Flood Risk, and includes indicators and targets for monitoring. (F) is a performance indicator for EAW and not really an appropriate target for monitoring environmental outcomes associated with the implementation of the plan. Please see required indicators in LDP Manual 9.5.4.

---

### **Council Analysis**

The representation is concerned that the Plan should specify mechanisms for the monitoring and implementation of policy as outlined in WAG Planning Guidance, and in particular that the SEA contains inappropriate indicators in relation to Flood Risk

These issues have been addressed in the Deposit LDP.

---

### **Council Response**

The Deposit LDP details monitoring procedures and meaningful indicators as required by WAG Planning Guidance.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Ensure that the Preferred Strategy is sufficiently flexible to respond to changes in the economy, housing apportionment, strategic site take up, Wales Spatial Plan and other changes, including HOV strategy delivery risks, especially in relation to employment and housing (see separate representations made on employment and housing).

---

### **Council Analysis**

The Deposit Plan has been drafted to ensure that there is sufficient flexibility to accommodate changes in the economy, housing apportionment, site take up, Wales Spatial Plan and other changes, including HOV strategy delivery risks, especially in relation to employment and housing. In particular, the plan allocates more land than is needed for such land uses as housing, employment, and waste, to allow for flexibility and choice.

In any event the Council is required to prepare an Annual Monitoring Report (AMR) on the LDP following its adoption. The Report will identify any policy that is not being implemented and give reasons, together with any steps the Council intends to take to secure the implementation of any policy and any intention to revise the LDP to replace or amend the policy. The AMR will include an assessment of whether the basic strategy remains sound. If not, a full plan review may be needed.

---

### **Council Response**

The representors concerns are addressed in the Deposit Plan, and any unforeseen circumstances will be addressed through annual monitoring.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Energy Wales has serious concerns about the plan because it does not acknowledge the importance of exploitable coal reserves that are close to the surface.

---

### **Council Analysis**

The representation expresses serious concerns about the plan because it does not acknowledge the importance of exploitable shallow coal reserves.

The British Geological Survey (BGS) has identified a primary and secondary coal resource for the South Wales Coalfield consisting of shallow coal which may be exploitable. However neither BGS, nor the Coal Authority has been able to give any indication of whether exploitation of the resource would be viable, partly because viability depends on a complex range of economic and other factors at any one time. However, having reconsidered WAG Guidance in Minerals Planning Policy Wales and TAN2 the Council is now minded to safeguard the primary and secondary resource as set out in Policy SP9 and Policy CW9 of the Deposit LDP.

---

### **Council Response**

The shallow coal resource is shown as a constraint on both the Deposit LDP Proposals and Constraints Maps, and the Strategic Policy on Minerals Safeguarding and the Countywide Policy on Locational Constraints - Minerals in the Deposit LDP provide for its safeguarding.

**Document:** Candidate Site  
**Paragraph:** 6.28

**Section:** 6  
**Policy:**

**Page:** 025

---

**Representation**

I commend the emphasis placed on environmental consideration through the LDP (Preferred Strategy). I feel that loss of habitat is a major issue for flora & fauna as well as the aesthetic quality of the environment.

---

**Council Analysis**

The representation supports the emphasis placed on environmental considerations throughout the Preferred Strategy document.

---

**Council Response**

This support is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

In Paragraphs 6.37-6.39 it should be made more explicit that planning obligations will only be sought where they contribute towards the mitigation of development impacts and meet the test of Planning Circular 13/97, and are not a more general source of local authority revenue raising. It should be recognised that flexibility will be required over the level of planning obligation that will be sought from the development of a brownfield site. Indeed, obligations should be adjusted to take account of high levels of abnormal development costs which could render a development uneconomic.

---

### **Council Analysis**

The representation is that the Plan should be more explicit in relation to planning obligations, and explain that planning obligations will only be sought if they meet the test of Planning Circular 13/97.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to identify the relevant Guidance within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:** 021

---

### **Representation**

We support the Preferred Strategy, which seeks to provide a hybrid approach to growth allowing for a development approach which is tailored to the needs of the various elements of the County. The importance of the south of the County and connections to Cardiff to the economic performance of the whole Borough should be reflected when detailed allocations are made.

---

### **Council Analysis**

The support for the Strategy is welcomed. The relationship of the south of the County Borough area to Cardiff and the M4 has been demonstrated by the area specific policies and allocations in the Deposit Plan.

---

### **Council Response**

The support for the Strategy is welcomed. The relationship of the south of the County Borough area to Cardiff and the M4 has been demonstrated by the area specific policies and allocations in the Deposit Plan.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 9

**Page:** 040

---

### **Representation**

We request that an additional point is added to policy SP9 which states "the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development".

---

### **Council Analysis**

The representation is that the policy in the Plan on planning obligations should state that the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development.

The planning obligations that the Council will seek to secure from developments will obviously always have regard to the economic viability of the development, and it is not considered either necessary or helpful to make this point within the Plan.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

We note the requirement for 9,500 new residential dwellings to 2021 which has been derived from the "provisional apportionment exercise" undertaken at the regional level. We also understand that this work has yet to undergo independent scrutiny or examination. The requirement will therefore need to be properly justified and tested in due course having regard to the advice in Planning Policy Wales (para 9.22). The Council appears to be planning for net in-migration over the plan period, which is a positive approach and is welcomed. However to properly reflect the way in which the Plan intends to embrace growth the expression of the housing requirement as a "maximum" should be replaced with "at least". The figure of 9,500 should not be seen as a ceiling, rather a floor which can be exceeded if sustainable locations for new housing can be achieved. Moreover, a flexibility allowance of 10% should also be included as a safeguard should brownfield sites not be delivered at the foreseen rate.

Request that the wording of SP 6 (2) is amended to "at least 9,500" dwellings, along with a flexibility allowance of 10% as a safeguard should brownfield sites not be delivered at the foreseen rate.

---

### **Council Analysis**

---

### **Council Response**

---

**Document:** LDP Strategy  
**Paragraph:** 6.25-6.33

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

We support the reuse of brownfield opportunities where appropriate and the designation of settlement boundaries. Indeed, where existing employment land and premises are not considered to be suitable to meet the long term requirements of modern businesses and are sustainably located within settlement boundaries then alternative uses should be sought. Moreover, innovative, mixed use approaches to development should be found, particularly on brownfield sites which may have economic viability problems. The locational context of brownfield sites must also be considered and in particular adjacent uses and proximity to major public transport routes.

---

### **Council Analysis**

Some of the employment land allocated in the UDP has not been allocated for employment purposes in the Deposit LDP, precisely because its viability for other uses is deemed to be greater. The requirement for employment development to be accompanied by infrastructural improvements and measures such as Green Travel Plans will bring about an increase in the accessibility of employment sites and enhance their viability.

---

### **Council Response**

No change to be made.

## Representation

We note that the Employment Topic Paper indicates that the future employment land requirement will be based upon the Atkins Study on Employment Sites Supply and Market Appraisal(2006). Our understanding of this report is that it identifies a significant oversupply of employment land compared with a limited future land requirement for growth to 2016. In taking this forward to a more detailed level it is important that a full and comprehensive review of both existing allocations and underused employment

stock is undertaken. We note that there are numerous existing problems within Caerphilly, most notably the high instance of out - commuting from the County to other areas, particularly along the M4 corridor. In order to reverse this unsustainable trend, the County will need a high quality and competitive stock of employment land which meets the requirements of modern occupiers. Furthermore, any review of employment land should be based on the sustainability principles which are inherent within the LDP preferred strategy in order to promote a balanced disposition of land uses linked into existing land use patterns and sustainable transport infrastructure improvements.

We request that future land requirements should be tailored according to particular sectoral forecasts. HM Treasury forecasts indicate that Office based employment is forecast to be the largest growth sector in the future. Offices can be developed at a much higher density than industrial sites. This requirement will have an impact upon future land requirements since developing an office building at 40% of the site area can accommodate around 400 jobs per ha as opposed to the assumption of 50 per ha across the board in the UDP. Moreover, it is likely that a significant amount of job growth will be within non B uses as such consideration should be given to the contribution of retail and service sector contributions towards job growth. Taken together these characteristics suggest a need to review existing low grade employment sites so as to identify suitable redevelopment opportunities as exists at Twycynnydd Industrial Estate.

---

## Council Analysis

Some sites allocated and protected for employment development within the UDP have not been allocated for any purpose in the Deposit LDP, in an effort to rationalise the portfolio of employment land, taking into account the projected requirement over the plan period. However, in order to foster the growth of a healthy and diverse local economy, it is necessary to retain a relatively significant supply of allocated and protected land as proposed by the LDP. This will consist of a mix of large and small sites intended for varying ranges of use classes (business parks, primary sites and secondary sites) spread across the three strategy areas. Permitting sui generis uses where appropriate will complement the overall employment 'offer'.

---

## Council Response

No change required.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

In general we support the Local Development Plan Vision Statement and note that the strategy must be delivered in relation to the respective roles and function of each individual settlement. The four key themes seem to be limited in light of the Vision Statement which requires the strategy to reflect the key roles and function of each settlement, we would suggest that these four themes need to be expanded in order to cover all the elements of a successful community including housing, retail, leisure and employment.

---

### **Council Analysis**

The representation refers to the four themes of the Council's Community Strategy. It is not the role nor the remit of the LDP to amend another key strategy document of the Council. Nevertheless, the four themes of the Community Strategy taken together are fully representative of all aspects of community life and protection of the environment, including matters which the LDP as a land use document cannot address.

---

### **Council Response**

As explained in the analysis the representation is not relevant to the LDP itself. Changes to the reference in the LDP strategy to the Community Strategy's basis is not possible.

---

**Document:** LDP Strategy  
**Paragraph:** 6.37

**Section:** 6  
**Policy:**

**Page:** 027

---

### **Representation**

In the Preferred Strategy Paragraph 6.37-6.39 it should be made more explicit that planning obligations will only be sought where they contribute towards the mitigation of development impacts and meet the test of the Planning Circular 13/97, and are not a more general source of local authority revenue raising. It should be recognised that flexibility will be required over the level of planning obligation that will be sought from the development of a brownfield site. Indeed, obligations should be adjusted to take account of high levels of abnormal development costs which could render a development uneconomic.

---

### **Council Analysis**

The representation is that the Plan should be more explicit in relation to planning obligations, and explain that planning obligations will only be sought if they meet the test of Planning Circular 13/97.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

WAG Guidance is that the Plan should not repeat national policy, and indeed may be considered unsound if it does so.

It is therefore not considered either necessary or helpful to identify the relevant Guidance within the Plan itself.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:** 021

---

### **Representation**

We support the Preferred Strategy which seeks to provide a hybrid approach to growth allowing for a development approach which is tailored to the needs of the various elements of the County. The importance of the south of the County and connections to Cardiff to the economic performance of the whole Borough should be reflected when detailed allocations are made.

---

### **Council Analysis**

The support for the Strategy is welcomed. The relationship of the south of the County Borough area to Cardiff and the M4 has been demonstrated by the area specific policies and allocations in the Deposit Plan.

---

### **Council Response**

The support for the Strategy is welcomed. The relationship of the south of the County Borough area to Cardiff and the M4 has been demonstrated by the area specific policies and allocations in the Deposit Plan.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 9

**Page:** 040

---

### **Representation**

We request that an additional point is added to policy SP9 which states "the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development".

---

### **Council Analysis**

The representation is that the policy in the Plan on planning obligations should state that the contribution from brownfield sites will be assessed having regard to the associated development costs which are required in order to bring forward a scheme for development.

The planning obligations that the Council will seek to secure from developments will obviously always have regard to the economic viability of the development, and it is not considered either necessary or helpful to make this point within the Plan.

The planning obligations that the Council will seek to secure from developments are detailed in Supplementary Planning Guidance (SPG) that will be the subject of public consultation together with the Deposit LDP. The information in this SPG might allay the concern of the representor to some extent.

---

### **Council Response**

That the information on planning obligations identified should not be included in the Deposit LDP as requested.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

We note the requirement for 9,500 new residential dwellings to 2021 which has been derived from the "provisional apportionment exercise" undertaken at the regional level. We also understand that this work has yet to undergo independent scrutiny or examination. The requirement will therefore need to be properly justified and tested in due course having regard to the advice in Planning Policy Wales (para 9.22). The Council appears to be planning for net in-migration over the plan period, which is a positive approach and is welcomed. However to properly reflect the way in which the Plan intends to embrace growth the expression of the housing requirement as a "maximum" should be replaced with "at least". The figure of 9,500 should not be seen as a ceiling, rather floor which can be exceeded if sustainable locations for new housing can be achieved. Moreover, a flexibility allowance of 10% should also be included as a safeguard should brownfield sites not be delivered at the foreseen rate.

Request that the wording of SP 6 (2) is amended to "at least 9,500" dwellings, along with a flexibility allowance of 10% as a safeguard should brownfield sites not be delivered at the foreseen rate.

---

### **Council Analysis**

---

### **Council Response**

---

**Document:** LDP Strategy  
**Paragraph:** 6.25-6.33

**Section:** 6  
**Policy:**

**Page:** 025

---

### **Representation**

We support the reuse of brownfield opportunities where appropriate and the designation of settlement boundaries. Indeed, where existing employment land and premises are not considered to be suitable to meet the long term requirements of modern businesses and are sustainably located within settlement boundaries then alternative uses should be sought. Moreover, innovative, mixed use approaches to development should be found, particularly on brownfield sites which may have economic viability problems. The locational context of brownfield sites must also be considered and in particular adjacent uses and proximity to major public transport routes.

---

### **Council Analysis**

Some of the employment land allocated in the UDP has not been allocated for employment purposes in the Deposit LDP, precisely because its viability for other uses is deemed to be greater. The requirement for employment development to be accompanied by infrastructural improvements and measures such as Green Travel Plans will bring about an increase in the accessibility of employment sites and enhance their viability.

---

### **Council Response**

No change to be made.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 7

**Page:** 040

---

### **Representation**

We note that the Employment Topic Paper indicates that the future employment land requirement will be based upon the Atkins Study on Employment Sites Supply and Market Appraisal (2006). Our understanding of this report is that it identifies a significant oversupply of employment land compared with a limited future land requirement for growth to 2016. In taking this forward to a more detailed level it is important that a full and comprehensive review of both existing allocations and underused employment

stock is undertaken. We note that there are numerous existing problems within Caerphilly, most notably the high instance of out-commuting from the County to other areas, particularly along the M4 corridor. In order to reverse this unsustainable trend, the County will need a high quality and competitive stock of employment land which meets the requirements of modern occupiers.

Furthermore, any review of employment land should be based on the sustainability principles which are inherent within the LDP preferred strategy in order to promote a balanced disposition of land uses linked into existing land use patterns and sustainable transport infrastructure improvements.

We request that future land requirements should be tailored according to particular sectoral forecasts. HM Treasury forecasts indicate that Office based Employment is forecast to be the largest growth sector in the future. Offices can be developed at a much higher density than industrial sites. This requirement will have an impact upon future land requirements since developing an office building at 40% of the site area can accommodate around 400 jobs per ha as opposed to the assumption of 50 per ha across the board in the UDP. Moreover, it is likely that a significant amount of job growth will be within non B uses as such consideration should be given to the contribution of retail and service sector contributions towards job growth. Taken together these characteristics suggest a need to review existing low grade employment sites so as to identify suitable redevelopment opportunities as exists at Twycynnydd Industrial Estate.

---

### **Council Analysis**

Some sites allocated and protected for employment development within the UDP have not been allocated for any purpose in the Deposit LDP, in an effort to rationalise the portfolio of employment land, taking into account the projected requirement over the plan period. However, in order to foster the growth of a healthy and diverse local economy, it is necessary to retain a relatively significant supply of allocated and protected land as proposed by the LDP. This will consist of a mix of large and small sites intended for varying ranges of use classes (business parks, primary sites and secondary sites) spread across the three strategy areas. Permitting sui generis uses where appropriate will complement the overall employment 'offer'.

---

### **Council Response**

No change required.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 5  
**Policy:**

**Page:** 019

---

### **Representation**

In general we support the Local Development Plan Vision Statement and note that the strategy must be delivered in relation to the respective roles and functions of each individual settlement. The four key themes seem to be limited in light of the Vision Statement which requires the strategy to reflect the key roles and function of each settlement, we would suggest that these four themes need to be expanded in order to cover all the elements of a successful community including housing, retail, leisure, and employment.

---

### **Council Analysis**

The representation refers to the four themes of the Council's Community Strategy. It is not the role nor the remit of the LDP to amend another key strategy document of the Council. Nevertheless, the four themes of the Community Strategy taken together are fully representative of all aspects of community life and protection of the environment, including matters which the LDP as a land use document cannot address.

---

### **Council Response**

As explained in the analysis the representation is not relevant to the LDP itself. Changes to the reference in the LDP strategy to the Community Strategy's basis is not possible.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

I refer to the Preferred Strategy document and have to say on behalf of my Clients that the strategy is to be supported in that it seeks to exploit opportunities in the Mid-Valleys conurbation and the northern part of the County Borough through both regeneration and greenfield site development where appropriate.

---

### **Council Analysis**

The representation supports the Preferred Strategy, in that it seeks to exploit opportunities in the Mid-Valleys conurbation and the northern part of the County Borough through both regeneration and greenfield site development where appropriate.

---

### **Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:** 6.54

**Section:** 6  
**Policy:**

**Page:** 030

---

**Representation**

It is noted that major housing growth is to be concentrated in those settlements with good public transport facilities and those with access to a railway station. My clients support the strategy in that it suggests at Paragraph 6.54 that residential development should be concentrated on Bargoed and Rhymney.

---

**Council Analysis**

The representation supports the Preferred Strategy's aim of targeting residential development opportunities in settlements with good public transport, and in particular in Bargoed and Rhymney in the Heads of the Valleys Regeneration Area.

---

**Council Response**

This support is noted and welcomed.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

I am writing to express our client's support for the Preferred Strategy as a whole and in particular Strategic Policy SP6 (Allocation for Population Growth and Housing Land). Within the above context, Policy SP6 provides for the development of 9,500 residential units up to 2021 within the County Borough. This allocation is supported to ensure the provision of a wide range of property types and tenures in order to cater for a growing population. The allocation of housing land to meet this requirement will necessarily be prioritised within existing settlements and where possible on brownfield sites.

---

### **Council Analysis**

The representation supports the Preferred Strategy as a whole, and in particular Strategic Policy SP6.

The support for the Preferred Strategy is acknowledged. However, the Council considers that the levels of net in-migration implied by the housing land allocation proposed in Strategic Policy SP6 in the Preferred Strategy are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The full justification for this decision is given in the Background Paper on Population & Housing (see Section 4).

---

### **Council Response**

The support for the Preferred Strategy is noted and welcomed, but the housing land allocations in the Deposit LDP are lower than those supported by the representation.

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

**Representation**

Use brownfield sites, leave the greenfield sites alone

---

**Council Analysis**

One of the key components of the LDP Strategy is to "exploit brownfield opportunities where appropriate." Sites submitted for consideration for their suitability for inclusion as allocations within the Deposit Plan have been subject to rigorous assessments, including consideration of whether the land is brownfield or greenfield, with brownfield sites being considered more favourably. In taking sites forward for allocation in the Deposit LDP, brownfield sites that are considered acceptable for development have been allocated in preference to greenfield sites. However, in some settlements, greenfield sites have been released where there are no suitable brownfield alternatives and where development would be necessary to address other components of the plan, including the targetting of development to the role and function of settlement in order to sustain them as viable communities.

---

**Council Response**

This issue has been fully incorporated in both the LDP Strategy and the site selection process.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Make more use of brownfield sites ie old schools, factories and pit sites etc.

---

### **Council Analysis**

One of the key components of the LDP Strategy is to "exploit brownfield opportunities where appropriate." Sites submitted for consideration for their suitability for inclusion as allocations within the Deposit Plan have been subject to rigorous assessments, including consideration of whether the land is brownfield or greenfield, with brownfield sites being considered more favourably. In taking sites forward for allocation in the Deposit LDP, brownfield sites that are considered acceptable for development have been allocated in preference to greenfield sites. However, in some settlements, greenfield sites have been released where there are no suitable brownfield alternatives and where development would be necessary to address other components of the plan, including the targetting of development to the role and function of settlement in order to sustain them as viable communities.

---

### **Council Response**

The issue has been fully incorporated in both the LDP Strategy and the site selection process.

---

**Document:** LDP Strategy  
**Paragraph:** 2.29

**Section:**  
**Policy:**

**Page:** 011

---

### **Representation**

Dowlais Top Investment Company Limited objects most strongly to your Authority's express intention in its Preferred Strategy 'not to protect' the established coal reserve at Nant Llesg in the Upper Rhymney Valley Area.

Our company has extensive land holdings with coal and mineral interests along the Heads of the Valleys and those interests in this area are very established and well documented. The heritage of the surrounding settlements relies heavily on them as is reflected in the Heritage section of the Scoping Report in Part 1 of your Strategic Environmental Assessment Sustainability Appraisal. Our company takes a pragmatic and responsible approach in managing its landholdings by trying to accommodate the diverse interests of landowners, commoners, mineral owners and the community at large. A recent example is our agreement (Subject to Contract) to lease a reservoir to Caerphilly to help the wider tourism initiative.

The presence of the minerals has to be acknowledged as they are of both local and National importance and can only be worked where they lie.

They are a National asset and an important source of future revenue for both the local and Welsh economies and we would, therefore, expect the local authority to follow the responsible approach of both the UK and Welsh Assembly Governments in providing for the protection of such important reserves.

Caerphilly's strategy for the Local Development Plan is deficient in addressing Minerals Planning Policy Wales. Whereas there has been some consideration given to the protection of sand and gravel as aggregates along with a guarded suggestion of their protection, it appears that there is no similar consideration for coal. It appears that you have already decided to abandon the Nant Llesg reserve prior to any industry or public consultation process.

Caerphilly is sitting on valuable energy reserves and we feel that the present proposed local plan assessment provides an unrealistic approach to sustainability.

The Caerphilly Local Development Plan will cover fifteen years - 2006 to 2021, a period during which untold jeopardy could be caused to the Nant Llesg coal reserve if it is not protected. We have already seen one such factor in the granting of planning consent for the EC02 wind farm over the reserve. This was granted despite strong objections to the proposal from both Miller Argent (South Wales) Limited and the Coal Authority. Such a decision should not have been made and it is time for this reserve to be given the recognition it deserves.

The Preferred Strategy of the Local Development Plan does not mention specific candidate sites, yet there is already an apparent abandonment of the authority's responsibility for protecting coal reserves. This should be fully addressed and justified as reasonable and sustainable at this early stage of the plan's development if it is to be retained within the Authority's strategy.

---

### **Council Analysis**

The mining of coal has a temporary but often long term impact on amenity. However, for the time being we rely on coal for energy generation and there are economic benefits from mining for the duration of the site. The plan will seek to ensure that any mineral extraction that is necessary to meet our needs is undertaken in the most sustainable way. Coal and other minerals are safeguarded in the deposit plan so that an informed decision can be made at the appropriate time balancing the need for the mineral, which it is acknowledged must be worked where it is found, with the environmental impacts associated with its extraction.

---

**Council Response**

Coal and other minerals throughout the county Borough are now safeguarded in the Deposit LDP in accordance with WAG guidance. Proposals for development within the safeguarded areas will be considered against all the policies in the pla, including those dealing with tourism and amenity.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The document does not clearly outline the functional relationships between Caerphilly and neighbouring authorities, particularly Cardiff. It would be helpful if it outlined the extent to which people living in Caerphilly are dependent on Cardiff and other areas for employment, the resultant travel-to-work patterns/trends, and how these are anticipated to change as a result of the preferred strategy and be sustainably addressed through it.

---

### **Council Analysis**

Consideration was given to the functional relationships between Caerphilly Borough and neighbouring authorities in the Preferred Strategy. Detailed issues that relate to neighbouring authorities have been fully taken into account in terms of the policies and allocations within the Deposit Plan. 'Background Paper 7- Employment' provides information in respect of commuting patterns to and from Caerphilly County Borough and how these are likely to impact on the land needed for employment over the plan period.

---

### **Council Response**

Consideration was given to the functional relationships between Caerphilly Borough and neighbouring authorities in the Preferred Strategy. Detailed issues that relate to neighbouring authorities have been fully taken into account in terms of the policies and allocations within the Deposit Plan.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

A key component of the strategy is to allow for development opportunities in the North and to promote a balanced approach to growth by limiting development opportunities in the Southern Connections Corridor to brownfield sites. Whilst this is welcomed in principle, the reality is that a significant proportion of the brownfield land lies in the south adjacent to Cardiff. The strategy also proposes that major housing growth will be limited in the south and concentrated in settlements with good public transport facilities, particularly rail. Whilst this is welcomed in principle, the reality is that, of the primarily residential settlements listed as lying within the Caerphilly Basin, only Llanbradach is served by a railway station.

---

### **Council Analysis**

The concern about over allocating development sites in the Caerphilly Basin have been taken into account in the production of the Deposit Plan. The spatial distribution of development is considered to be well balanced between the settlements in the three strategy areas in relation to their function and also their capacity. Where possible advantage has been taken of proximity to rail stations. However, passenger rail service is an inadequate means of transport in the South Wales valleys due to its lack of capacity. Road based public transport is far more important and will remain so.

---

### **Council Response**

The concern about over allocating development sites in the Caerphilly Basin have been taken into account in the production of the Deposit Plan. The spatial distribution of development is considered to be well balanced between the settlements in the three strategy areas in relation to their function and also their capacity. Where possible advantage has been taken of proximity to rail stations. However, passenger rail service is an inadequate means of transport in the South Wales valleys due to its lack of capacity. Road based public transport is far more important and will remain so.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Recognising the limitations of restricting growth in the south will, undoubtedly, put additional pressure on both road and rail links to Cardiff which are heavily congested at peak commuter periods. Whilst improvements to the Rhymney Valley Line have helped ease rail congestion, the line is still constrained by capacity problems, particularly at Queen Street. Moreover, it is understood from joint meetings that demand for spaces at existing rail-based park and ride sites outstrips supply and further constrains the potential for commuting by rail to Cardiff. In this regard, the proposal for a park and ride site at Llanbradach is welcomed. However, it is questioned whether this will meet existing and future demand for rail-based park and ride over the LDP plan period.

---

### **Council Analysis**

The UDP realised significant improvements to the provision of park and ride facilities along the Rhymney Valley passenger line, with improved facilities being provided at Ystrad Mynach, Aber and Caerphilly. In order to encourage greater use of rail services, particularly for commuting journeys to Cardiff, improved park and ride provision will be sought at four stations along the Rhymney Valley line, namely Llanbradach, Pengam, Bargoed and Rhymney. It is also the intention to seek additional park and ride provision at Ystrad Mynach. However further work to investigate and assess alternatives for increasing provision needs to be undertaken prior to any allocation being made in the plan.

---

### **Council Response**

In order to encourage greater use of rail services, particularly for commuting journeys to Cardiff, improved park and ride provision will be sought at four stations along the Rhymney Valley line, namely Llanbradach, Pengam, Bargoed and Rhymney. It is also the intention to seek additional park and ride provision at Ystrad Mynach. However further work to investigate and assess alternatives for increasing provision needs to be undertaken prior to any allocation being made in the plan.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The LDP and Sewta RTP should contain proposals to:

- (1) improve public transport links and particularly rail capacity on key routes into Cardiff; and
  - (2) enhance existing rail-based park and ride sites and safeguard new sites in order to accommodate the increase in demand that will undoubtedly be generated by new development in the borough and the proposed introduction of road user pricing.
- 

### **Council Analysis**

It is accepted that improving links to all new stations should be a priority to encourage use of the rail service for a large number of journey purposes, not just commuting trips. Improving public transport links to the stations and the provision of a network of park and ride facilities is a critical part of establishing the rail line as an important transport link to neighbouring areas such as Cardiff.

The Rhymney Valley line has benefited from recent and ongoing works to improve frequencies and network capacity between Bargoed and Cardiff. The final stage of the Rhymney Valley Line Frequency Enhancement scheme is a key priority of the RTP and will provide a half hourly service between Bargoed And Rhymney, through the provision of a turning loop at Tirphil. The scheme will enable a new station at Energlyn to be provided, which will be identified in the LDP.

The opening of the Ebbw Line is of significant benefit for public transport in the county borough. Whilst the new passenger services are welcomed, the Council is still seeking the establishment of a station at Crumlin, which would assist in providing public transport to the main employment centre at Oakdale. The new service runs to Cardiff, which is already served by the Rhymney Valley Line. As part of the original proposal for the opening of the Ebbw line, a service to Newport was proposed as part of the phase 2 works. The opening of the link to Newport is an important element in extending public transport use within the area, and this will continue to be pursued over the plan period.

---

### **Council Response**

The comments are noted.

---

**Representation**

Caerphilly Local Development Plan Preferred Strategy Representations on behalf of National Grid

We are instructed by National Grid to submit representations in respect of the Caerphilly Local Development Plan Preferred Strategy. Our representation is set out as follows: Candidate Sites Inspection of the Candidate Sites in Appendix 10 of the Preferred Strategy indicates that some of the sites are located in an area in which the National Grid has an interest:

Overhead lines run through or are adjacent to the following sites:

- . D01/E06 Cray Paint Works
- . D03 Land Adjacent to Upper Glyn Gwyn Street
- . D04 Bedwas Colliery
- . D145/E375 Caerphilly Road Industrial Estate
- . E62 Land to the North of Fochriw
- . E129 Land adjacent to Mill Farm
- . E158 Land North of Colliery Road
- . E173 Land off Mountain Road
- . E203 Land at the Oaks
- . E294 Land at Glyn Gwyn Farm

For your information, plans of overhead lines in the Caerphilly County Borough Council area are enclosed, which illustrate the position of overhead lines and an individual representation form has been completed for each candidate site.

#### Overhead Lines

It is National Grid's policy to retain its existing high voltage overhead lines in situ, because of the cost, practicality and strategic importance of these overhead line routes. National Grid requests that the location and nature of the existing high voltage electricity equipment be taken into account when planning development in the vicinity of these overhead lines.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. For example scaffold would need to be erected to protect properties built directly under overhead lines when line refurbishment is carried out.

The statutory safety clearances between overhead lines the ground and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

For your information, we have also enclosed a National Grid booklet entitled 'Development Near Lines: Planning and Amenity Aspects of high voltage transmission lines and Substations'. This sets out those factors that should be taken into account in proposing or allocating development near any of National Grid's assets. It also provides some background information to National Grid and the function and characteristics of overhead lines and substations. The statutory safety clearances

that need to be maintained in the immediate vicinity of high voltage overhead lines, are detailed in this brochure. We would advise prospective developers to contact the National Grid at the earliest opportunity to discuss any development proposals in the vicinity of its lines.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to a overhead line route should be used to make a positive contribution to the development of a site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. Landscaping schemes should also have regard to the presence of the overhead line across the site. There are two important issues to consider when planning a landscaping scheme in the vicinity of a National Grid overhead line:

- . National Grid needs to have safe access to the overhead line for inspection maintenance and refurbishment. Planting within 2 metres of the tower base should be avoided vehicular access to the towers should not be prevented by new planting schemes.

- . To ensure that safety clearances are not infringed once landscaping schemes reach maturity. Only slow growing low height species should be planted in the area beneath an overhead line. National Grid, in association with David Lock Associates has produced guidelines on how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. For your information, I have enclosed a copy of the guidelines entitled 'A Sense of Place' which introduces this work and which may be useful in the preparation of the future development proposals.

#### Summary

National Grid wishes to draw the Council's attention to the presence of overhead lines in relation to candidate sites in order that National Grid's interests can be protected in any future development proposals. National Grid would also be grateful if the Council would consult the National Grid during the preparation of any future development proposals and future stages of the LDP in order that the issue of development near overhead lines and gas transmission can be fully addressed.

---

#### **Council Analysis**

The locations of these overhead lines is noted, and have been taken into account in the preparation of the Deposit Plan, along with the location of other utilities in the vicinity of candidate sites.

---

#### **Council Response**

No change is required.

**Representation**

Based on the provisional apportionment exercise undertaken by the South East Wales Strategic Planning Group (SEWSPG), paragraph 2.18 establishes a maximum house building rate within the county borough of 650 dwellings per annum to 2021. If Caerphilly County Borough Council are minded to use the 'SEWSPG build rate projection it should not be adopted as a maximum build level as the figure is an estimated forecast rather than a precise certainty. 650 dwellings per annum could be used as a guide for future build rates, however, an element of flexibility should be acknowledged by Caerphilly County Borough Council in response to ever changing housing market conditions. The figure set out in paragraph 2.18 should form a target for housing development within the county borough rather than being 'accepted as a basis for determining the maximum land allocation for housing'. A step-change in housing delivery across the South East Wales sub-region is needed to meet anticipated growth projections and to provide housing land where it is in greatest demand. A number of housing sites within the Caerphilly County Borough Council northern valleys region have been allocated for residential development for sometime and have little prospect of coming forward for development. It is therefore essential that Caerphilly County Borough Council considers the deliverability of historically allocated sites in relation to the reality and realism of them coming forward and that it should thereby seek to allocate land for housing that has a good prospect of coming forward for development within the LDP period the allocation of land that has no realistic chance of being developed for housing should be resisted so as to maximise the prospect of achieving the identified housing target.

---

**Council Analysis**

The representation is that the SEWSPG build rate projection of 650 dwellings per annum to 2021 should be a target for housing development rather than being 'accepted as a basis for determining the maximum land allocation for housing'.

It should first be noted that the Council considers that the levels of net in-migration implied by the SEWSPG projected house-building rate of 650 dwellings pa are unlikely to be achieved, and has therefore adopted the lower figure of 575 pa for the housing provision in the Deposit Plan. The full justification for this decision is given in Topic Paper on Population & Housing (see Section 4).

This projected house-building is both a target for the Plan, against which the actual house-building rates achieved will be monitored, and has been used as the basis for determining the housing land allocations in the Plan.

---

**Council Response**

The Council has adopted a projected house-building rate for the Deposit LDP of 575 dwellings pa. This is both a target for the Plan, against which the actual house-building rates achieved will be monitored, and has been used as the basis for determining the housing land allocations in the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 2  
**Policy:** 3

**Page:** 039

---

### **Representation**

Although the recently completed employment sites study and market appraisal is not publicly available, it is evident that the existing employment land bank in the borough is substantial. We would question whether it is all required or whether some might appropriately be released for other land uses where this would not have a detrimental impact upon the local economy and where it could make a positive contribution towards the need for other land uses. Paragraph 7.2.1 of Planning Policy Wales supports this approach, stating that where a local planning authority has an allocation for employment land or other non-housing allocations that will not realistically be taken up during the plan period, these sites should be reviewed and consideration should be had to whether some of the land might be better used for housing or mixed use developments. Criterion 4 of policy SP3 should be re-drafted to provide further flexibility to ensure that surplus employment land might be released for other purposes where it can be demonstrated that its retention has been sought but without success and where its retention would not be detrimental to the strength of the local economy. Clarification should also be given as to the level of development that might be sufficient to potentially threaten the employment land bank.

---

### **Council Analysis**

Some sites allocated and protected for employment development within the UDP have not been allocated for any purpose in the LDP, in an effort to rationalise the portfolio of employment land, taking into account the projected requirement over the plan period. However, in order to foster the growth of a healthy and diverse local economy, it is necessary to retain a relatively significant supply of allocated and protected land as proposed by the LDP. This will consist of a mix of large and small sites intended for varying ranges of use classes (business parks, primary sites and secondary sites) spread across the three strategy areas. Permitting sui generis uses where appropriate will complement the overall employment 'offer'. It is considered that this approach will allow for the location of non-class B development on such sites, where appropriate. Housing is not considered a suitable use for employment land, especially given that more than sufficient land has been made available in order to satisfy the housing requirement within the County Borough over the course of the plan period. The need for employment land will be examined during the review of the plan, providing an opportunity for sites to be removed, should they be deemed surplus to requirements regarding their intended primary use.

---

### **Council Response**

No change required.

**Representation**

The Council states that it will undertake a comprehensive re-assessment of sites that do not have the benefit of planning consent and that sites with planning consent will be carried forward as appropriate. As part of the assessment, Caerphilly County Borough Council should also review sites with existing planning consent as it should not be assumed that these sites will come forward for the approved development. Recognising that a large amount of land benefits from planning permission but with very little prospect of ever being delivered, a critical review of existing housing and employment allocations should be undertaken as part of the LDP process. Consideration should be given to re-allocating those sites that are not considered to have any reasonable prospect of coming forward due to market or other physical constraints. This would ensure that all allocations can be relied upon to contribute towards the housing and employment targets and that the development requirements in Caerphilly can thereby be achieved in the most sustainable and appropriate manner.

---

**Council Analysis**

The representation is concerned with the allocation of sites that have had the benefit of planning permission for housing or employment use but are unlikely to come forward for development due to physical constraints or the market. In the determination of sites to be taken forward for inclusion within the LDP, a comprehensive re-assessment of sites has been undertaken which has examined the suitability of sites for inclusion in the LDP. As part of this, sites with planning consent have been re-examined in light of the plan strategy and changing planning policy context to ensure that only sites that are realistically likely to come forward are included in the plan. It should be noted that the granting of planning consents indicates that the principle of development is acceptable and therefore sites with planning consent are realistic prospects for development. Only sites with a valid planning consent as of the base date of 1st April 2007 have been identified in the plan as committed sites (ie sites with a valid planning permission). Sites that have previously been granted consent but the consent had expired as of 1st April 2007 have been reassessed but only taken forward where they were found to be acceptable in light of current planning policy.

With regards to employment sites, as part of the evidence base for the LDP, the Council commissioned consultants to undertake an Employment Sites Supply and Market Appraisal Study which examined the suitability of allocated and protected employment land for continued employment use and has informed allocations in the LDP. Whilst planning consent was a factor in the assessment process on allocated employment sites, it was one of a number of considerations used to make recommendations on which sites should be taken forward for inclusion in the plan.

---

**Council Response**

The issue has been fully considered through the site selection process with only appropriate sites allocated under Policy HG 1 in the LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 7

**Page:** 040

---

### **Representation**

Policy SP7 states that employment land has been identified within the core strategy, however, it does not quantify the amount of employment land that is required within the county borough. In order to provide the basis for sustainable economic growth and to contribute towards the diversity and the strengthening of the local economy it is important for the Preferred Strategy to specify the level of additional employment land that is required within the county borough. Policy SP7 states that land is identified for business, general industry, storage, distribution, and waste management/resource recovery. However, it does not say how much land is allocated and provides no strategic direction as to the most appropriate locations for such development. Nowhere in the preferred strategy is such Strategic guidance provided.

The lack of any specified employment land target represents a key failing within the Preferred Strategy. It fails to provide the basis for the achievement of key objectives relating to the enhancement of the local economy and an increase in levels of economic diversity. Policy SP7 should therefore be re-drafted in the light of the emerging employment land assessment to detail the overall quantity of employment land and them amount of land specifically required to meet the emerging needs for office and industrial space.

---

### **Council Analysis**

The representation is concerned that the Strategic Policy SP7 Allocation for Employment Land in the Preferred Strategy did not specify the total amount of employment land required in the county borough.

The reason for this omission is that this level of detail was inappropriate for the Preferred Strategy document, and the Strategic Policy on Managing Employment Growth in the Deposit LDP, together with the Area Specific Policies on Employment Site Allocations and Protections, provide the requested information. The justification for these policies is provided in the Background Paper on Employment.

---

### **Council Response**

The employment policies of Deposit LDP provide the requested information on employment land requirements in the county borough.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Further development should be done further up the valley, Bargoed, Fochriw etc. The building of the Bargoed Relief Road means that this would be an ideal solution.

---

### **Council Analysis**

One of the component parts of the Preferred Strategy is to allow for development opportunities in the North of the County Borough in order to create a viable future for all of the communities (Paragraph 6.18). In light of this, new housing will be accommodated where there is a need to diversify the housing stock in order to retain the existing population and regenerate deprived communities in the north. The role of the Bargoed bypass 'Angel Way' is recognised as an important part of the overall regeneration of the area as it is anticipated that it will act as a catalyst to encourage investment into the area. However, the Preferred Strategy acknowledges that even though development will be promoted in the north, it is important to promote a balanced approach to further growth by distributing development across the whole County Borough in order to promote and sustain them as viable residential areas, focusing development in more sustainable areas. The allocations in the Deposit Plan fully reflect these aims.

---

### **Council Response**

The role of the Bargoed bypass 'Angel Way' is recognised as an important part of the overall regeneration of the area as it is anticipated that it will act as a catalyst to encourage investment into the area. However, the Preferred Strategy acknowledges that even though development will be promoted in the north, it is important to promote a balanced approach to further growth by distributing development across the whole County Borough in order to promote and sustain them as viable residential areas, focusing development in more sustainable areas. The allocations in the Deposit Plan fully reflect these aims.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The words "not having village merging" should be included in the strategy. Each village has, and is always entitled to have its own identity.

---

### **Council Analysis**

The Council considers that as a result of development patterns and pressure there is a need to define and maintain both open spaces within urban areas and between settlements. The Green Wedge policy seeks primarily to prevent coalescence and to prevent any further development that would be detrimental to the integrity of the individual settlements.

The representation is concerned with the omission of reference to Green Wedges in the preferred strategy. Green Wedges have been included as allocations within the Deposit LDP as area based allocations. The Green Wedge policy seeks to prevent the coalescence within and between settlements to protect the integrity and the individual characteristics of settlements.

---

### **Council Response**

The representation has been noted, and a Green Wedge allocation policy to prevent the coalescence of settlements has been included within the Area Specific Policies section of the Deposit LD. The policy will seek to protect the integrity and character of individual settlements.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 2  
**Policy:**

**Page:**

---

### **Representation**

Do we need more housing in an already overpopulated area? Current trends show the population is decreasing.

---

### **Council Analysis**

The representation asks whether more housing is needed in an already overpopulated area, when current trends show that the population is decreasing.

There is a need for new housing even if the population were constant, because the average number of people in households is declining. This results from several factors such as families having fewer children than in the past, and the splitting of families due to marital breakdown, but primarily because of the increase in the number of one-person households, many of them elderly.

In fact, however, the population of the county borough is currently increasing. The population of Caerphilly increased from 169,500 in 2001 to 171,300 in 2006, due to both natural increase (the excess of the number of births over deaths), and net in-migration.

The full justification for the population and household forecasts underlying the Deposit LDP are given in the Topic Paper on Population & Housing (see Section 4).

---

### **Council Response**

The full justification for the population and household forecasts underlying the Deposit LDP are given in the Topic Paper on Population & Housing (see Section 4).

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

It is apparent that Caerphilly County Borough Council has a significant housing requirement that cannot be entirely met on brownfield sites and therefore the Council must consider the release of greenfield sites for development.

---

### **Council Analysis**

One of the key components of the LDP Strategy is to "exploit brownfield opportunities where appropriate." Sites submitted for consideration for their suitability for inclusion as allocations within the Deposit Plan have been subject to rigorous assessments, including consideration of whether the land is brownfield or greenfield, with brownfield sites being considered more favourably. In taking sites forward for allocation in the Deposit LDP, brownfield sites that are considered acceptable for development have been allocated in preference to greenfield sites. However, in some settlements, greenfield sites have been released where there are no suitable brownfield alternatives and where development would be necessary to address other components of the plan, including the targetting of development to the role and function of settlement in order to sustain them as viable communities.

---

### **Council Response**

The views have been taken into account in the preparation of the Deposit LDP

**Document:** LDP Strategy Appendices  
**Paragraph:**

**Section:** 6

**Page:**

---

**Representation**

The Preferred Options Report identifies the Mid Valleys Conurbation as an important focus for future development, and emphasises the central role that development here will play in regeneration of the Valleys in the future.

---

**Council Analysis**

The representation notes that the Preferred Options Report identifies the Mid Valleys Conurbation as an important focus for future development, and emphasises the central role that development here will play in regeneration of the Valleys in the future.

---

**Council Response**

The comment is noted.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

The preferred options report also acknowledges that very few settlements are capable of being self-sufficient within the County Borough. It is therefore important to promote a mix of land uses in close proximity to each other that can meet the needs of the immediate and also of the wider community.

---

### **Council Analysis**

The suitability of uses within settlements is determined by the position of each location within the settlement hierarchy as set out in the strategy and in part three of the Deposit LDP. The allocation and protection of a range of land uses within settlements across the County Borough is an integral part of the LDP process, and a balanced approach to land allocations is promoted. However, not every settlement is capable of providing a comprehensive range of uses and land is therefore allocated in line with the role and function of the settlement.

---

### **Council Response**

The issue raised has been taken into account in the preparation of the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

Firstly, I would like to express my admiration for the considerable effort invested in the preparation and production of a very comprehensive document drafted in a manner that conveys a broad and difficult subject matter into a readable and understandable format. Secondly, I would like to state that I only have a basic understanding of the key issues involved and little technical knowledge of the broader infrastructure I am aware that there are literally volumes of legislation affecting the decision making process dictating the future utilisation of land. Finally, I have only concentrated my observations on the northern Rhymney Valleys for the reasons I believe are of concern. There appears to be a substantial conflict between well documented strategies and objectives compared to the proposed implementation (Candidate sites register) that in my opinion would fail to deliver a successful regeneration outcome for the outlying area as a whole.

To deliver this argument I have set out in the following pages a brief history of the Upper Rhymney Valley area especially the Principal Town of Bargoed in context with its neighbouring Principal Towns. Furthermore I have reviewed the potential candidate sites and the importance of the emphasis of locally based future investment patterns necessary to deliver the regeneration objectives.

It is extremely important to fully consider and debate the implications of any document dictating the future use of selected areas of land to deliver a particular economic strategy for the LDP 2006-2021. A significant economic limiting factor of the earlier UDP 1996-2003 was the depressed level of new house prices within the Borough, new residential development was mainly confined to Blackwood and Caerphilly as these areas could justify high enough house prices (in that period) to warrant development. It is a fundamental point to note that existing planning related policies should make allowance for sufficient new housing development within areas which have yet to benefit from that experience, ie the Northern Rhymney Valley. Furthermore may I state the very obvious, in economic terms 15 years is a very long time in business and politics. The point being made, if Caerphilly, Blackwood & Ystrad Mynach continue their runaway growth at current rates because of flexible planning opinion and Bargoed continues to stagnates or even declines further because of over cautious planning considerations then there are very serious social, economic and political repercussions of the lack of 'Balanced Growth' from a very disaffected community.

---

### **Council Analysis**

The preparation of the LDP is being undertaken within the climate of "spatial" planning, a concept that regards the planning system as a means of giving expression in land-use terms to the whole gamut of social policy objectives and initiatives that exist. Where these conflict, it is within the remit of the planning system, and the mechanisms it employs (particularly the development plan) to undertake a mediatory role, not in terms of each individual programme insofar as it exists and operates in isolation, but in terms of how this affects land-use. The bottom line is to achieve development that is sustainable in economic, social and environmental terms, at community, village, town and County Borough level. Clearly this can be a difficult balance to reach, especially as this way of working was only introduced in 2004. It requires the involvement of all areas of the public sector, local communities and key stakeholders. As such, it is an iterative process. Where there are conflicting objectives to be dealt with when attempting to adopt the right approach, it is preferable to address these during the early stages of plan preparation through early and effective engagement with all concerned with, and potentially affected by, the LDP. It is entirely possible that the gap in economic prosperity and social wellbeing between the northern and southern areas of the Borough could widen in the short-term. However, the policies and allocations in the Deposit LDP have been drawn up to facilitate growth in the Upper Rhymney and Sirhowy Valleys in order to fulfil the function and capacity that these settlements possess.

---

## **Council Response**

The preparation of the LDP is being undertaken within the climate of "spatial" planning, a concept that regards the planning system as a means of giving expression in land-use terms to the whole gamut of social policy objectives and initiatives that exist. Where these conflict, it is within the remit of the planning system, and the mechanisms it employs (particularly the development plan) to undertake a mediatory role, not in terms of each individual programme insofar as it exists and operates in isolation, but in terms of how this affects land-use. The bottom line is to achieve development that is sustainable in economic, social and environmental terms, at community, village, town and Borough level. Clearly this can be a difficult balance to reach, especially as this way of working was only introduced in 2004. It requires the involvement of all areas of the public sector, local communities and key stakeholders. As such, it is an iterative process. Where there are conflicting objectives to be dealt with when attempting to adopt the right approach, it is preferable to address these during the early stages of plan preparation through early and effective engagement with all concerned with, and potentially affected by, the LDP. It is entirely possible that the gap in economic prosperity and social wellbeing between the northern and southern areas of the Borough could widen in the short-term. However, the policies and allocations in the Deposit LDP have been drawn up to facilitate growth in the Upper Rhymney and Sirhowy Valleys in order to fulfil the function and capacity that these settlements possess.

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

## Representation

### 1. BARGOED TOWN CENTRE HIERARCHY - PRINCIPAL TOWN STATUS

The LDP denotes Bargoed as a Principal Town within the Borough and has a defined role to play in the economic regeneration of the North & Mid Rhymney Valley area. The LDP is by definition a forward looking document but it is extremely important to recognise the fact that the pattern and magnitude of future investment decisions must take into account the historical deficiencies of the past in order to deliver 'Balanced Growth'. Replacement of lost economic prosperity is not growth.

Appendices - Section 6 Functional Analysis of Community plan Areas Page 53 - definition of "Bargoed & Upper Rhymney Valley, 'The area is among the most deprived in Europe - all nine wards in the district are Community First Wards'. This comment is made in 2007 7 years after European Group 1 funding commenced within Wales, significant positive projects such as New Tredegar have improved matters but the area as a whole still awaits economic growth. How does this affect the drafting of the LDP? The suitability, magnitude and suggested use of available Land for future economic utilisation should underwrite future 'Balanced Growth' Does it though?

When considering this area's economic future and role within the Borough due consideration should be factored into that economic assessment. Firstly by appreciating the historical scale of both absolute economic decline (direct comparison of today's economic capacity and yesterday's) and relative decline (Comparison with other Principal Towns) of past economic performance. There is a danger that the LDP could try and project forward investment decisions from a level playing field perspective and represent that within the allocation of resources towards the Upper Rhymney Valley.- the restricted use of future candidate sites for example, must take into account the inadequacies of the past, the playing field is far from level.

#### Absolute Regression/Decline - Factor into future Planning Requirements

It is well understood that Bargoed has declined in absolute terms over the last 40 years, by that I mean a physical reduction in employment and economic activity even well past the mining era and many of the declining factors were inevitable. However, due to un-precedented technology Good Government and disclosure, the economic future can be debated more readily than ever before. The current retail provision in Bargoed suffers an approximate +30% vacancy rate based upon unoccupied floor area (not just empty buildings). I am fully aware of the retail Plateau scheme planned investment in conjunction with the Relief Road ( WAG & CCBC joint venture) will reduce vacant property and replace it with modern retailing ( I had an involvement with the landscape architects on it's design and with the Council with it's inception). The scheme is most welcome and positive, however this only takes the town back to its former retail capacity, it is not growth, this project restores the historical retail equilibrium. What is needed is a niche approach to provide unique destination facilities that attract footfall and inward investment.

#### Relative Economic Regression/Decline - Factor into future planning Requirements

The important point of a relative assessment is to stress the sheer magnitude of the economic growth achieved within the other Principal Towns. The order of priority of economic investment over the last decade had been more or less correct for other wards (and dictated by house prices);the Borough had to focus investment into areas that produced the most efficient results. The priority was and is to retain retail expenditure within the Borough, increase employment and stop outward migration of the population. Major New Housing projects in Caerphilly 'Cwrt Rawlin' and Grove Park/Highfields in Blackwood under- scored the advance of retail investment and

substantial increase in both the Towns economic fortunes. Blackwood is now 22nd among Welsh Retail Centres by contrast Bargoed has fallen off the economic map to 57th, substantial New Housing projects helped retain the local population even attracting inward population migration, thereby creating a population critical mass sufficient to attract inward retail/leisure investment.

#### European Group I Funding 2000-2006- Infra-Structure Investment

Blackwood& Oakdale received substantial economic assistance (correct timing of investment) to re-establish road links and provide a superb new industrial development Oakdale Business Park to regenerate the mid Valleys area. Ystrad Mynach emerged as a Principal Town with the help of European Support for Tredomen Office provision and investment into the local college to assist 'Life long' learning. Ystrad Mynach will be further elevated with a +£130m New Hospital which is a tremendous success story for all involved. Caerphilly benefited from a wide range of schemes to help regenerate the Southern basin. Bargoed had three specific local projects funded by European Group 1 funds over that six year period nearing £500k approximately 85- 90% less than each of the investment patterns in the three other Principal Towns, with projects totalling £85m. It is clear from the above factors that the Upper Rhymney Valley is in desperate need of specific project driven economic redress and this must be factored into future economic evaluations (and hence the LDP) for the utilisation of land. It makes sense to initially focus regeneration on Bargoed Town as this conurbation under scores the Northern Rhymney Valley, it should operate as a hub of economic/leisure activity and outwardly migrate economic success and opportunity.

---

#### **Council Analysis**

The economic decline of the Upper Rhymney and Sirhowy Valleys, and its relatively poor socio-economic standing as a result, is the reason for the application of a different strategic approach in this area to that employed in the south. The intention is reduce the gap that currently exists in terms of economic prosperity and social conditions. The planning system cannot bring this about in isolation but the policies ultimately contained within the LDP will be vital in terms of how they influence the dynamics of the development industry, and to what extent. The Preferred Strategy, as is indicated by the development of more than one strategic approach for the County Borough as a whole, recognises the existence of such inequalities and does not argue that the present situation represents a "level playing field". Nor does it do so in terms of allocation of resources. Indeed, the planning system does not act to allocate resources per se. However, whilst it previously served only to regulate development, it is intended that the move to a more inclusive "spatial" system, exhibiting a greater sense of social awareness, will be able to undertake a more proactive role in terms of 'steering' development and, therefore, the movement of resources. The policies and allocations in the Deposit Plan aim to bolster the position of Bargoed as the main settlement and service centre in the Heads of the Valleys Regeneration Area.

---

#### **Council Response**

The economic decline of the Upper Rhymney and Sirhowy Valleys, and its relatively poor socio-economic standing as a result, is the reason for the application of a different strategic approach in this area to that employed in the south. The intention is reduce the gap that currently exists in terms of economic prosperity and social conditions. The planning system cannot bring this about in isolation but the policies ultimately contained within the LDP will be vital in terms of how they influence the dynamics of the development industry, and to what extent. The Preferred Strategy, as is indicated by the development of more than one strategic approach for the County Borough as a whole, recognises the existence of such inequalities and does not argue that the present situation represents a "level playing field". Nor does it do so in terms of allocation of resources. Indeed, the planning system does not act to allocate resources per se. However, whilst it previously served only to regulate development, it is intended that the move to a more inclusive "spatial" system, exhibiting a greater sense of social awareness, will be able to undertake a more proactive role in terms of 'steering' development and, therefore, the movement of resources. The policies and allocations in the Deposit Plan aim to bolster the position of Bargoed as the main settlement and service centre in the Heads of the Valleys Regeneration Area.

**Representation**

## 2. BALANCED GROWTH Previous UDP Strategy &amp; Future LDP Strategy 2006-2021

Basically, a fundamental concept/strategic cornerstone of the UDP/LDP is to try and provide/deliver 'Balanced Growth' across the Borough, obviously this is affected by many factors. The new capital investment for Bargoed as seen in the building of the Relief Rd and Retail Plateau are evidence of the infrastructural investment pendulum swinging back to a hugely under-invested area but as stated earlier this investment only makes good part of the historical economic short comings, it is not growth.

## Major Weaknesses Point I - Lack of Ambition in New Housing/Commercial Development 2006-2021 Upper Rhymney Valley

A review of the Candidate Site Register attached in the appendices to the report reveal that there are no proposed major New Housing/Commercial Development Projects for the area - Candidate Sites Analysis for the Bargoed and Gilfach ward does not contain any provision for substantial new residential developments looking forward for the next 15 years. What is equally alarming is the absence of any candidate sites put forward for commercial development. The quantity and quality of future candidate sites for an area represents a barometer of current economic attitude/opinion/optimism. The analysis of the candidate sites for Bargoed and Gilfach amount to 5 sites in total, representing just 0.1% of the total Boroughs register.

The LDP clearly states (Para 6.23, Page 24, Preferred Strategy, April 2007) that opportunities for residential developments will be distributed across the whole County Borough but targeted to settlements with good rail and bus links'. Furthermore, point 6.19 Page 24 'The Preferred Strategy will seek to accommodate new housing in villages where there is a need to retain the existing population and regenerate deprived areas of the North'. Furthermore the Overall Summary clarifies the point 6.99 Page 37, 'The development of new housing will be encouraged in former mining villages that currently have a poor choice of property types and lack modern residential development'.

There is a material contradiction here of spending £22m on improving new road and rail links without supporting substantial new housing projects in Greater Bargoed Area. Of the 5 candidate sites in Gilfach and Bargoed none are deemed suitable for major residential development, See E 73 Candidate Sites register. Major proposed sites in Aberbargoed also have been declined E02 & E03. What I mean by lack of ambition is exactly that, the review panel should be actively encouraging and stimulating development in affected areas with greater emphasis than that of successful regenerated areas. Evidence of the Candidate Site Register findings makes for depressing reading. As stated earlier, the Greater Bargoed area could not share in the first wave of new housing projects as new house prices in that area did not warrant investment at that time. However at today's prices the Greater Bargoed area falls within the development map, yet there is a lack of ambition within the planning appraisal process to release land for such use, or actively pursue opportunities. This lack of ambition will postpone growth for another 15 years in a desperate area.

## Major Weakness Point 11- Restricted Supply of Future Candidate Sites

The Preferred Strategy objectives look to 'Exploit Brownfield opportunities, point 6.25 Page 25, 'the most notable sites being the Bargoed Plateau 11 hectares; however the actual definitive utilisation of this site visible in the Candidate Site Register is A25 and has mixed use. The lack of supply of land for residential and mixed use as defined by the Candidate Site Register applied specifically to

the Greater Bargoed Area will not deliver effective economic growth as enjoyed elsewhere. The economic life blood that is - future developable available land is insufficient, in absolute terms, especially given the critical economic needs of decades of under investment. The developable land historically locked away in these Brownfield sites condemned the area to below average growth; now that major capital restoration projects are underway every recovered acre needs to be maximised economically.

Both Blackwood and Caerphilly have identified substantial new residential development opportunities designated for further expansion of it's new housing stock in the LDP(2006-2021) which includes the potential release of Caerphilly Golf Club for housing, Blackwood has sites E277, D15,C24 and A17 supporting further substantial growth in the quantity and variety of new housing stock. Ystrad Mynach will benefit from the £28m new Council offices, £130m New Hospital and the +£ 12m spent on Ystrad Mynach college. There are sufficient new development opportunities to underwrite continued economic growth of these Principal Towns for the period covered by the LDP. The same is not true of the area under review, which compounds the economic failings of the past; Bargoed is in danger of falling further back against runaway growth elsewhere in the Borough and neighbouring Local Authorities.

#### Major Weakness Point III - Section 106 Benefits from Developers Community Facilities

By locking away substantial new housing development opportunities (those that don't conflict with the overall strategy) Bargoed will be denied the secondary benefit of Section 106 enhancement investment, for example Redrow's contribution on the Cwm Calon development, Merthyr Village Ltd will provide £17m of Section 106 community benefits if the scheme moves ahead. The current LDP candidate sites for the Greater Bargoed Area will deliver a limited benefit and substantially less than neighbouring Principal Towns.

---

#### **Council Analysis**

The Deposit Plan has sought to allocate the most appropriate housing sites within the three strategy areas. In the Bargoed area the various site constraints have combined to deliver most of the housing sites in Aberbargoed rather than Bargoed itself. These were chosen because of the relative function and capacity of the two settlements. It was considered that the redevelopment sites in Bargoed should be allocated for commercial development in preference to residential units.

---

#### **Council Response**

The Deposit Plan has sought to allocate the most appropriate housing sites within the three strategy areas. In the Bargoed area the various site constraints have combined to deliver most of the housing sites in Aberbargoed rather than Bargoed itself. These were chosen because of the relative function and capacity of the two settlements. It was considered that the redevelopment sites in Bargoed should be allocated for commercial development in preference to residential units.

---

**Document:** LDP Strategy Appendices  
**Paragraph:**

**Section:** 6

**Page:**

---

### **Representation**

#### **3. VALLEYS REGIONAL PARK - UPPER RHYMNEY VALLEY**

The Valleys Regional Park is a perfectly fine concept and marketing the Caerphilly Borough as the leisure release for the major cities of Cardiff and Newport makes good sense. There is a very real danger however I believe of viewing the economic prosperity of the Upper Rhymney Valley in exactly those terms i.e. Parkland. There is the real risk of suppressing development opportunities that would be supported elsewhere i.e. compare the release of Caerphilly Golf Club C21 to the suppression of land such as E02 & E03 in Aberbargoed & Gwerthonor Ganol farm E73, furthermore Point 6.17 Page. The assessment of candidate sites and their suitability seems inconsistent in a number of cases and they must be evaluated in the overall context of delivering the appropriate economic package befitting the specific requirements of the area. The point I am trying to make is due consideration must be made of the collective impact (consolidation) of the proposed developments of a number of wards. High quality new housing will encourage more economically active people into the area further stimulating economic growth.

---

### **Council Analysis**

The Valleys Regional Park is intended to be a loose network of tourist-orientated facilities and attractions throughout the entire County Borough. The fact that it is a less formal concept than a strict, site-specific designation, is unlikely to mean that it will prevent development where planning considerations deem it to be favourable. Also, its Borough-wide status means that it will not favour, or compromise, the Upper Rhymney Valley at the good fortune, or expense, of other areas.

The economic future and prosperity of the area is addressed through the Heads of the Valleys "Turning Heads...A Strategy for the Heads of the Valleys" strategy. The Heads of the Valley programme seeks to secure the economic growth in the Upper Rhymney Valley, and it is through this programme rather than the Valleys Regional Park concept, which is more focused upon promoting the countryside assets of the South Wales Valleys that the economic prosperity of the region is realised.

---

### **Council Response**

The economic future and prosperity of the Upper Rhymney Valley is addressed through the Heads of the Valleys "Turning Heads...A Strategy for the Heads of the Valleys" strategy. The Heads of the Valley programme seeks to secure the economic growth in the Upper Rhymney Valley, and it is through this programme rather than the Valleys Regional Park concept, which is more focused upon promoting the countryside assets of the South Wales Valleys, that the economic prosperity of the region is realised.

**Representation**

## 4. BARGOED - LEISURE DESIGNATION/ HOVI

The Preferred Strategy defined in the LDP, paragraph 6.17 states 'Allow for development opportunities in the North'. The inclusion of Bargoed in the Heads of the Valley Initiative is most welcome and will no doubt bolster the town over the project period. However you can only regenerate and develop land designated as such, the magnitude of future economic growth is restricted in part by the availability/supply of land, and the limited supply is by definition a limiting factor. The concept of the Valleys Regional Park needs to be fleshed out in more detail. With regard to the Leisure concept there is currently very little developed leisure provision within the Town (excluding outdoor facilities), see below:-

## Major Weakness Point IV - Leisure Facilities Provision/Tourism

To promote Bargoed as a 'Leisure destination' makes excellent sense and complements the economies of the other Principal Towns, however, the discussion of a Multiplex cinema which is crucial starting point is only the first step. What is the current Leisure Provision? To quote Appendices Section 6 p59. "The local Leisure Centre needs to be developed; the swimming pool is 30 years old and only available on "Weekends and Evenings"" end quote.

Bargoed Park is 45 acres of under-utilised sports/leisure facilities and assets, it contains over 12 acres of overgrown scrub land with no apparent use, compare that to Morgan Jones award winning park in Caerphilly. Bargoed Park boasts the only original purpose built athletics track in the Borough (and still is) but according to the internet/athletics is unfit for formal competition use, field events are unusable. LDP - no substantial candidate sites are put forward for Leisure based investment for the next fifteen years by private landowners in the Upper Rhymney Valley. There are no destination attractions or leisure/sports provision currently available to bring into the area much needed footfall, in fact the opposite is true the existing facilities are sub-standard in parts and inferior to those of other Principal Towns (Newbridge Pool). The review of the wider Bargoed area candidate sites shows no ambition for Leisure or Sports development.

**Council Analysis**

Regarding candidate sites, the Council cannot force landowners and others with an interest in individual plots of land to submit sites for leisure development. The Council can, of course, safeguard land itself within the LDP for such uses. However, this is one example of where the "spatial" approach to development planning is the means by which such issues are resolved. The planning system cannot address this issue on its own; those within the public sector responsible for the maintenance of such facilities, and the activities that occur within them, must be brought into the process, along with members of the local community to ascertain why existing facilities are underused and if, and how, these issues can be resolved in an interactive process. It must be pointed out though that the planning system is not responsible for, nor can it control, the physical condition or demand for such facilities.

**Council Response**

Within the Deposit LDP provision is made for new leisure facilities serving the northern valleys such as a new leisure centre and development of a network of facilities to form part of the Valleys Regional Park. Also the existing leisure provision in Bargoed (including the Country Park) will be protected from inappropriate (ie built) development in mostly informal use, whilst more formal playing fields can be located elsewhere. Particular sites, eg Bargoed Town Park, are specifically identified for protection to ensure that facilities such as the athletics track remain available and open to investment.

---

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

## **Representation**

### 5. COMPETITION - NEIGHBOURING BOROUGHES & PRINCIPAL TOWNS

Whatever the investment plans are developed for the North Rhymney Valley, it is extremely important to evaluate the impact of the material investment plans of neighbouring relevant Local Authorities and Principal Towns. There are ambitious multi million integrated investment plans for Merthyr Tydfil, Merthyr Village Limited which will only increase the vulnerability of the area under review. Newport Unlimited the purpose built regeneration vehicle is actively pursuing massive urban investment plans to upgrade Newport's Retail, Leisure and residential offer. Cardiff has developed its International Sports Village ISV whilst Swansea is looking to create the first indoor surfing facility in a State of the Art mega project. With regard to the other Principal Towns, South Caerphilly Regeneration limited is proposing an ambitious Town based regeneration scheme and private investment continues to expand Blackwood's out of town retail offer. It is a well known fact that the topography of the area limits investment opportunities, therefore the area has to maximise what it has and actively re-think how to stimulate the economic fortunes of the area. The existing LDP's emphasis towards that goal for the area appears to be insubstantial.

---

## **Council Analysis**

The Council cannot control the actions of other local planning authorities regarding their own strategic approaches. However, all LPAs within South East Wales should be working within the context of SEWSPG guidance in order that their activities are undertaken within a regional context and are therefore broadly complementary. The policies and allocations in the Deposit Plan for Bargoed and Rhymney in terms of commercial development opportunities seek to provide a means by which the planning system can help to facilitate economic growth within the north of the Borough, in partnership with initiatives such as the Heads of the Valleys programme, although whether or not this will be successful will ultimately depend upon private sector investment.

---

## **Council Response**

The Council cannot control the actions of other local planning authorities regarding their own strategic approaches. However, all LPAs within South East Wales should be working within the context of SEWSPG guidance in order that their activities are undertaken within a regional context and are therefore broadly complementary. The policies and allocations in the Deposit Plan for Bargoed and Rhymney in terms of commercial development opportunities seek to provide a means by which the planning system can help to facilitate economic growth within the north of the Borough, in partnership with initiatives such as the Heads of the Valleys programme, although whether or not this will be successful will ultimately depend upon private sector investment.

---

**Document:** LDP Strategy Appendices  
**Paragraph:**

**Section:** 10

**Page:**

---

### **Representation**

In order to achieve balance growth across the Borough, I believe a regeneration vehicle is required for the Upper Rhymney Valley, a partnership between the County Council and the private sector to unlock substantial local assets and resources in order to regenerate the area. Any analysis of the LDP recognises that there is a shortage of candidate sites to attract substantial investment in the area and private sector investment is notoriously difficult to find. The County Council has a massive role to play in reversing the fortunes of the Town and surrounding area. CCBC owns substantial land assets in this regeneration area that are not fully utilised to the extent that they should or could be. I am aware of at least 12 acres of prime residential land within the settlement boundary (no countryside infringement) owned by the Council BUT not put forward for development candidacy. Further assets such as Bargoed Park are under - utilised, with 12 acres at the rear of the stadium within the Park are waste scrub land idling away in an under performing Town. Take stock of the situation a 45 acre Park was befitting an industrial landscape in today's environment we need to ask more questions especially in the huge protected areas of Gelligaer common.

In the absence of alternatives it is a priority for the County Council to review their capital asset plans in the light of freeing up land resources for regeneration and employ those assets in a more productive and ambitious manner that can deliver 'Balanced Growth' to an impoverished area. Local Authority land disposals could be utilised for key local regeneration projects that deliver real growth and act as a kick start for the economic vitality of the area. By making land available for development and re-thinking the utilisation of existing land the limitation of the supply restrictions of land can be overcome and Bargoed can fulfil it's objective of being a truly Leisure based destination. There must be an ambition to drive through change in a very difficult environment; in my opinion the LDP as it currently stands, does not provide an economic package sufficient to deliver 'Balanced Growth' to the Upper Rhymney Valley.

The lack of commercial and economic ambition for land use within the Greater Bargoed area and the Upper Rhymney Valley as evidenced by the Candidate Site Register alarmingly points towards a continuation of economic decline for the Greater Bargoed Area (if left to the private sector). To overcome these shortcomings and deliver 'Balanced Growth', I believe the area requires a continuation of Keynesian economics as is currently witnessed with the Retail Plateau project within Bargoed Town namely Public Sector investment.

---

### **Council Analysis**

The representation is concerned with the role of the Council in releasing land for development as a means of promoting regeneration in the Heads of the Valleys strategy area. Of particular concern are two issues - a) that insufficient Council owned land has been released for housing in the area and b) that opportunities in Bargoed Park could be exploited as it is currently under-utilised.

With regards to the first point, as part of the site selection process, the Council's property division identified a number of sites across all three strategy areas to be considered for their suitability for development. These have been subject to the same rigorous assessment as sites in private ownership and where it is considered that sites are suitable for development and are in accordance with the strategy, they have been taken forward for allocation where they reflect the role and function of settlements. The sites allocated in the plan are those deemed most appropriate for development, regardless of land ownership. Through Policy HG1 a large number of units are allocated for housing across the settlements in the Heads of the Valleys Regeneration areas, offering a range of appropriate sites for development, along with the allocation of land for other uses including employment, leisure and retail. It is considered that these allocations will facilitate the regeneration of the area.

The other issue raised in the representation is in relation to opportunities at Bargoed Park. The Park is protected as a formal open space within the Deposit LDP. Whilst no specific schemes for enhancement are identified in the Plan, the policy framework will allow improvement schemes to come forward as appropriate.

---

### **Council Response**

The views regarding the need for regeneration in the Heads of the Valleys area have been taken into account through the allocation of a range of sites for housing and other uses.

**Document:**  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

## Representation

Bargoed Leisure Concept - LDP 2006-2021

Integrated sports village - draft idea 24/05/07

Objective i - to make Bargoed a destination stop for leisure based activities incorporating the northern Upper Rhymney Valley. Increase town footfall and help regeneration and deliver 'balanced' economic growth to an under performing area

Objective ii - overcome the lack of supply of land and lack of ambition for future projects by kick starting recovery.

Objective iii - utilise under performing resources that does not detract or reduce existing leisure facilities/sports provision

Objective iv - avoid duplication (provision) elsewhere within the borough

Target area - 12 acres of unused scrub land that is situated at the rear of the stand at Bargoed Park next to the main rugby pitch (see diagram). This land is capable of hosting (accommodate buildings) the following activities that are not currently within the borough, in overall terms increasing the total CCBC leisure offer.

Potential facilities - indicative purposes only

2 storey multi-functional sport complex next to field supporting

rugby/football/athletics/disabled/sport all ages/large fitness suite/changing rooms physio etc

etc/overlooking field ideal for tournaments & all year round sport. Refurbished athletics track (only one in the borough capable of hosting county tournaments) potential to house borough's training & athletics centre of excellence. New stand housing 500 watch all sports purpose built fun swimming pool - wave machine etc Llanishen type model/sauna etc etc or Centre Parcs model.

Purpose built ice rink with 500-1,000 seating for ice that converts to concert hall seating +2,500 - nowhere else in borough capable of holding large entertainment attractions with inward migration of retail expenditure. Potential for office space - community based organisations. Indoor climbing arena - purpose built . Ten pin bowling/cafeteria . Indoor bowls - 8 lanes. Car parking 450 plus 20 buses

How can all this be financed? Theoretically financed by CCBC sale of residential land assets within Bargoed settlement boundary

1. Land at rear Heolddu Grove - approx 5 acres

2. Land at rear Hillside Park - 6 acres thereby generating all important new housing within Bargoed help regeneration consistent with relief rd & retail plateau investment

3. Potentially raise £10m from land sales to major house builders

4. European convergence funding - based upon healthier lifestyle provision £5m/ no lottery monies available

5. The balance say £12-15m funded by PFI

Mix of leisure activities with potential 15/7 utilisation guarantee sports village to wash it's own face financially as no other facility in the borough especially in a village compact density plus good public transport & relief rd access to the town - net inflow. This approach creates jobs and will be capable of delivering growth to the area allowing Bargoed to fulfil its role within the LDP as a leisure destination. Furthermore this strategy will provide more than 120 plus new houses increasing Bargoed's residential offer by better utilising existing under invested assets all within the settlement boundary and set the town up for section 106 benefits from would be developers. Finally this strategy overcomes the lack of ambition within the economic investment community and pushes the town forward despite the shortcomings of future candidate sites.

## Council Analysis

The Preferred Strategy is not intended to contain site-specific, detailed proposals. This proposal will therefore be considered as part of the proposals for the Deposit LDP, or associated SPG that may emanate from the policies. In this context provision is being made for new leisure facilities serving the northern valleys such as a new leisure centre development of a network of facilities to

form part of the Valleys Regional Park, and a new multiplex cinema in the Bargoed Town Centre Regeneration Scheme. Also particular sites eg Bargoed Town/Country Parks are specifically identified for protection to ensure that facilities such as the athletics track remain available and open to investment.

---

### **Council Response**

Clearly protecting the existing leisure provision in Bargoed (including the Country Park) from inappropriate development is a priority in the LDP. The provision of new development including a modern multi-purpose centre with swimming pool and ancillary facilities is a strategic aim and it will be a matter of ensuring that the eventual location balances the needs and aspirations of all communities in the north of the County Borough. Whilst the LDP cannot control land disposals and likely costs to the extent advocated, through the above policies and highlighting further areas of need it can make a significant contribution to achieving the overall aim of improving leisure provision in and around Bargoed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:**  
**Policy:**

**Page:**

---

### **Representation**

We support the Preferred Strategy of encouraging development north of the Caerphilly basin area and particularly the intention to encourage new development within the Northern Connections Corridor on suitable brownfield sites with good access to public transport. Whilst we note the Council's intention to provide an additional 9,500 dwellings over the period 2006 - 2021 (Policy SP6 refers), we reserve the right to comment further at the Deposit LDP stage concerning the detailed justification of this figure and also the distribution of the overall housing provision across the plan area.

---

### **Council Analysis**

The representation support the Plan's proposals for encouraging development in the north of the county borough, and notes the proposed housing provision in the Plan.

The Preferred Strategy identified a range of possible future housing growth in the county borough over the Plan period, the highest figure being based on the Regional Household Apportionment exercise carried out by the SE Wales Strategic Planning Group (Sewspg). The Council considers that the levels of net in-migration implied by this higher figure are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The full justification for this decision is given in Topic Paper on Population & Housing (see Section 4).

---

### **Council Response**

The support for encouraging development in the north of the county borough is noted and welcomed. The Deposit LDP makes proposals for the level of housing growth and its distribution across the county borough on which the representor may wish to comment.

---

**Document:** LDP Strategy  
**Paragraph:** 6.40

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

My clients express support for the acknowledgement in paragraph 6.40 that further growth outside settlement boundaries would result in the development of particularly sensitive areas. It should be further acknowledged that unless more emphasis is given to the release of existing employment land for housing, not only in the Valleys Regeneration Area but elsewhere, more Greenfield land development, albeit in sustainable locations, is inevitable.

In Appendix 10 - Sites for Further Consideration, the inclusion of Sites D145 - Caerphilly Road Industrial Estate and E375 - Units 1 to 4 Caerphilly Road for offices/mixed use are noted as a preferred use. However in the Provisional LDP Candidate Site Assessment Summary both submissions are described as suitable for employment based uses but not residential. No firm reasons are given for arriving at this conclusion despite the Council's own acknowledgement that the site is not in demand for redevelopment for employment uses.

A masterplanning exercise has been undertaken which demonstrates that the site could be sympathetically developed for residential use or mixed uses including residential. This is attached to the submission. The site is a key gateway site to the south of Ystrad Mynach in close proximity to Ystrad Mynach College, the existing hospital and the proposed new General Hospital.

Whilst my clients are generally supportive of the Preferred Strategy document, on the basis of the points expressed above, they wish to object to the absence of an acknowledgement in the Strategy that, in order to meet the high expected population growth rate, sites without major infrastructure constraints, within established development boundaries, and where housing development would create a better environment for local residents, should be encouraged to meet shorter term needs.

---

### **Council Analysis**

The representor is concerned that more employment sites should be released for residential development rather than releasing greenfield sites for development. A further issue raised is that sites should be released in the short term in order to meet projected population growth rates. As part of the site selection process, existing protected and allocated employment sites have been reassessed by consultants as part of a Site Supply and Market Appraisal to determine their suitability for continuing employment use. Those sites deemed suitable have been taken forward as allocations or protections, and those sites that scored less well have been reassessed in order to determine their suitability for alternative uses, including housing, with sites being allocated for alternative uses where appropriate. It is important to note that the LDP promotes a balanced approach to future growth and therefore it is important that sufficient land is available for employment use to serve the needs of resident and it is not therefore considered appropriate to release further employment sites for alternative uses where it would undermine the role and function of settlements.

In relation to the second point on the release of sites in the short term, it is advised that the current development plan, the Unitary Development Plan, allocates land for development and provides the policy framework to allow windfall sites to come forward where appropriate in addition to allocated housing sites. There is no shortage of land in Caerphilly, with the most recent Joint Housing Land Availability Study (1st April 2007) published by WAG indicating that the Council has 17.3 years supply of land for housing.

---

### **Council Response**

The issue of the release of employment land has been taken into account through the site selection process. With regards to the short term release on sites for housing it is considered that no further action is necessary.

**Document:** LDP Strategy  
**Paragraph:** SP3

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

My Clients have considered the Development Options including the Preferred Strategy and they consider that, in the Northern Connections Corridor, more emphasis should be given to the redevelopment of older employment areas in predominantly residential locations where larger employment areas exist nearby with better access and can accommodate modern, purpose built units and where development for housing could achieve improved environmental conditions and amenities for existing residents.

In light of these points my Clients have objections and the Council are requested to make minor revisions to the Preferred Strategy document. Policy SP3 with amended wording is suggested.

---

### **Council Analysis**

Non of the sites allocated or protected for employment use within the LDP, with the possible exception of Oakdale, can be considered to be a strategic site. That said, each one has a purpose in terms of contributing to the provision of a diverse portfolio of employment land. It is felt that the sites in the Northern Connections Corridor will be capable of serving the needs of the local population in a sustainable fashion, given the LDP's requirement for adequate levels of infrastructural provision. Preferred Strategy policy SP3 has not been taken forward into the deposit plan, though this is due to it being deemed surplus to requirements in light of policy EM2, which seeks to protect employment sites in line with their respective strategy areas.

---

### **Council Response**

No change required - the policies currently within the Deposit LDP provide adequate protection.

---

**Document:** LDP Strategy  
**Paragraph:** 6.40

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

My clients express support for the acknowledgement in Paragraph 6.40 that further growth outside settlement boundaries would result in the development of particularly sensitive areas. It should be further acknowledged that unless more emphasis is given to the release of existing employment land for housing, not only in the Valleys Regeneration Area but elsewhere, more Greenfield land development, albeit in sustainable locations, is inevitable.

In Appendix 10 - Sites for Further Consideration, the inclusion of Sites D14 - Land at Croespenmaen Industrial Estate (including all the industrial land and countryside to the south) and E103 - (the western part of the industrial estate) for residential, leisure and employment uses is supported and it is noted that all the relevant boxes are ticked in terms of compatibility with the Strategy.

In order for this to gain further consideration as an allocation in the adopted Plan, my clients are providing additional supporting information. This is attached to the representations submitted.

---

### **Council Analysis**

Part of candidate site D14 is being taken forward as a housing site within the LDP, thereby reducing the size of those areas E1(6) and E2(12) protected in the UDP and illustrating the fact that some employment land is being released for housing, where the latter is considered to be a more viable use. It is not accepted that greenfield development is inevitable, however. The plan makes provision for a greater amount of housing than is forecast will be required over the plan period, in the interests of choice and flexibility, with all sites being incorporated into revised settlement boundaries. The requirement for infrastructural improvements, where necessary, will ensure that employment sites benefit from sustainable methods of accessibility.

---

### **Council Response**

No change required - it is considered that the plan makes provision for a sufficient level of new housing yet retains a diverse range of employment land.

**Document:** LDP Strategy  
**Paragraph:** SP3

**Section:** 7  
**Policy:**

**Page:**

---

### **Representation**

My Clients have considered the Development Options including the Preferred Strategy and they consider that, in the Northern Connections Corridor, more emphasis should be given to the redevelopment of older employment areas in predominantly residential locations where larger employment areas exist nearby with better access and can accommodate modern, purpose built units and where development for housing could achieve improved environmental conditions and amenities for existing residents.

In light of these points my Clients have objections and the Council are requested to make minor revisions to the Preferred Strategy document. Policy SP3 with amended wording is suggested.

---

### **Council Analysis**

Non of the sites allocated or protected for employment use within the LDP, with the possible exception of Oakdale, can be considered to be a strategic site. That said, each one has a purpose in terms of contributing to the provision of a diverse portfolio of employment land. It is felt that the sites in the Northern Connections Corridor will be capable of serving the needs of the local population in a sustainable fashion, given the LDP's requirement for adequate levels of infrastructural provision. Preferred Strategy policy SP3 has not been taken forward into the deposit plan, though this is due to it being deemed surplus to requirements in light of policy EM2, which seeks to protect employment sites in line with their respective strategy areas.

---

### **Council Response**

No change required - the policies currently within the deposit plan provide adequate protection.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 9  
**Policy:**

**Page:**

---

### **Representation**

My Clients have interests in land at Pen y Cwarel Road, Wyllie submitted as Candidate Sites for consideration through the LDP process. They have considered the Strategy and are generally supportive. However, it is felt that more emphasis should be given to limited forms of greenfield development in villages in the Northern Connections Corridor such as Wyllie, which could achieve positive benefits and allow the settlement to gain more character and identity whilst maintaining and enhancing community facilities.

The aim is to achieve a comprehensive form of development than could be achieved by restricting development within the established settlement boundary. Such a site would attract a national housebuilder and a sympathetically designed layout would effectively round off the village and improve its identity. It would also provide community benefits in the form of improved parking facilities for residents of Pen y Cwarel Road and would help sustain local facilities, for example the public house and shop/post office. A play area/public open space could be created as a focus for the community with opportunities for enhanced access to the wider countryside via linkages to recreational footpaths, including the Sirhowy Valley Walk and the Rhymney Valley Ridgeway Footpath.

---

### **Council Analysis**

The Preferred Strategy recognised that limited greenfield development would be required in the Northern Connections Corridor in order to reflect the role and function of settlements and help ensure communities are sustainable. These sentiments have been taken forward in the Deposit Plan. Whilst the LDP acknowledges that brownfield sites should be used in preference to greenfield sites, it is recognised that in some communities where appropriate brownfield opportunities are limited, it is necessary to take forward suitable greenfield sites in order to ensure growth is balanced in a sustainable manner.

---

### **Council Response**

The views have been taken into account in the preparation of the Deposit LDP.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 6

**Page:** 039

---

### **Representation**

A growth scenario is anticipated and again my Clients support the target of 9,500 new dwellings identified in Policy SP6, which will be required during the Plan Period.

Translated into annual anticipated house building rates, this will result in an increase to 650 dwellings per annum. Although it is acknowledged that recent annual completion rates in Caerphilly County Borough have approached 700, the average rate over the past 10 years has been marginally over 500.

---

### **Council Analysis**

The Preferred Strategy identified a range of possible future housing growth in the county borough over the Plan period: the representation supports the high figure of this range for the housing provision in the Plan

The Council considers that the levels of net in-migration implied by this high figure are unlikely to be achieved, and has therefore adopted the lower figure of 8,625 for the housing provision in the Deposit Plan. The full justification for this decision is given in the Background Paper on Population & Housing (see Section 4).

---

### **Council Response**

The justification for the housing provision in the Deposit LDP is given in the Background Paper on Population & Housing (see Section 4).

---

**Document:** LDP Strategy  
**Paragraph:** 6.15

**Section:** 6  
**Policy:**

**Page:** 023

---

### **Representation**

My Clients wish to object to the Strategy document on the basis that:

1. Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" would be more appropriate; and
  2. Figure 1 should clearly show that, as Wyllie relates to Pontllanfraith/Blackwood rather than any other principal town or key settlement, it should be included in the Northern Connections Corridor. A full supporting statement is attached.
- 

### **Council Analysis**

This representation suggests changes to the wording of a sentence on distinct identity in the Preferred Strategy. Whilst the importance of identity and local distinctiveness remain important themes of the plan, the preparation of the Deposit LDP has led to the review of this paragraph and it no longer exists in the same form. The wording of the paragraph cannot therefore be changed.

Whilst it is acknowledged that Blackwood is the nearest Principal Town to the settlement, Wyllie's size and surroundings are more similar to settlements to the south of it (Ynysddu, Cwmfelinfach, Brynawel) rather than the Mid Valleys Conurbation to the north. Whilst the Strategy Areas lines in the key diagram are arbitrary, they do broadly accord with Community Plan areas. Wyllie lies within the Lower Islwyn Community Plan area, which is part of the Southern Connections Corridor.

---

### **Council Response**

No changes should be made to the plan in respect of either of the issues raised in this representation.

---

**Document:** LDP Strategy  
**Paragraph:** 6.15

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Paragraph 6.15 refers to other settlements in the County Borough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported. However, in some villages such as Llanbradach a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with a better mix of housing, together with suitable benefits to the community.

My Clients object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in a village such as Llanbradach where a sympathetic scheme at key entry point into the village off the A469 could create and enhance its identity.

---

### **Council Analysis**

It is agreed that the enhancement of a settlement's identity is helpful in terms of adding distinctiveness and defining its role within a networked hierarchy of settlements. This can be done in a variety of ways, depending on the settlement in question, and it is important for such processes to be undertaken in a sustainable fashion. Generally, however, this is something that the Council would support and encourage, certainly from a strategic viewpoint.

Paragraph 6.15 no longer appears in the Deposit LDP. However the sentiments of this paragraph are reflected in the Settlement Strategy Policy which seeks to enhance existing residential areas that have local centres, neighbourhood shops and/or individual units serving more immediate needs.

---

### **Council Response**

Paragraph 6.15 no longer appears in the Deposit LDP. However the sentiments of this paragraph are reflected in the Settlement Strategy Policy which seeks to enhance existing residential areas that have local centres, neighbourhood shops and/or individual units serving more immediate needs.

---

**Document:** Candidate Site  
**Paragraph:** 6.21

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

Paragraph 6.21 states that "development opportunities in the Southern Connections Corridor and Caerphilly Town in particular are limited to brownfield sites." To restrict the development of a principal town and its satellite villages in this way is unsustainable as the town needs to maintain its status in the settlement hierarchy of South East Wales as a major retail, tourism and employment centre. Indeed, the need for Caerphilly to capitalize on its proximity to Newport and Cardiff is highlighted in paragraph 6.83. In that same paragraph, however, emphasis is again placed on the redevelopment of existing sites and not on the release of any substantial new Greenfield land.

The Caerphilly Unitary Development Plan (UDP) has been successful in preventing Greenfield development in the Caerphilly area, thus encouraging the development of the obvious brownfield sites. However, it is a fact that previously developed land is a finite resource and the availability of previously developed land in the Caerphilly area has diminished significantly. It is therefore considered that the LDP will need to identify Greenfield sites in Caerphilly Basin and Llanbradach to accommodate future housing needs. In reality, this can only be achieved by extending settlements in a sustainable way.

My Clients object to the Strategy document on the basis that it seeks to restrict growth in the Southern Connections Corridor, which includes Llanbradach, to brownfield sites. The settlement of Llanbradach needs to continue to provide a range and choice of housing sites to meet continuing requirements. My Client's site is part of a larger, comprehensive scheme on land which is partially brownfield and is in a sustainable location within a reasonable distance of a range of local facilities and services, including public transport.

---

### **Council Analysis**

The representation relates to the limitation of development to brownfield sites within the Southern Connections Corridor on the grounds that this would be unsustainable as it would undermine Caerphilly's role in South East Wales. In response to this, it should be noted that out of the three strategy areas, the Southern Connections Corridor, particularly within Caerphilly town itself, has the most brownfield land, and so can offer a range of sites for redevelopment opportunities. The availability of a wide range of acceptable brownfield sites ensures that there is sufficient land to allow development to reflect the role and function of settlements including Caerphilly's role as a principal town. In light of this, there is no justification for the release of greenfield sites in the strategy area as this would undermine other aims of the strategy including the key components of reducing the impact of development on the countryside and promoting resource efficient settlement patterns.

---

### **Council Response**

No change should be made to the Deposit Plan in respect of this representation.

---

**Document:** LDP Strategy  
**Paragraph:** 2.18

**Section:** 2  
**Policy:**

**Page:**

---

### **Representation**

Under National, Regional and Strategic Context (Section 2 of the Strategy) in paragraph Para 2.18 - the need to accommodate a high rate of population growth with a corresponding increase in the number of households, is supported.

---

### **Council Analysis**

The representation supports the adoption of a high rate of population and household growth, consistent with the National, Regional and Strategic Context.

The Regional Housing Apportionment exercise has now been completed, resulting in an annual house completion figure for Caerphilly of 650. However, the Council considers that the levels of net in-migration that are likely to be achieved justify an annual figure of only 575 for the housing provision in the Deposit LDP, and this figure has been used in the strategic policy on housing land.

It may be noted that, because of the need for flexibility and to allow for housing sites not being brought forward during the Plan period, the housing land allocations in the Deposit LDP are sufficient to meet the Regional Housing Allocation figure if required.

---

### **Council Response**

That no change be made to the Deposit LDP as a result of this representation.

**Document:** LDP Strategy  
**Paragraph:** 5.4

**Section:** 5  
**Policy:**

**Page:**

---

### **Representation**

Under Section 5 : A Vision for Caerphilly County Borough, the Vision Statement of the Caerphilly LDP as outlined in Para 5.4 is supported, particularly relating to the aim of regenerating towns, villages and employment centres in a sustainable way which reflects the specific role and function of individual settlements.

---

### **Council Analysis**

The representation supports the Vision Statement of the Preferred Strategy Document, particularly relating to the aim of regenerating towns, villages and employment centres in a sustainable way which reflects the specific role and function of individual settlements.

---

### **Council Response**

This support is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:** 6.4

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The Assessment of the Combined Strategy Option in paragraph 6.4 is supported, and, in particular the components or themes identified which include:-

- Promoting a balanced approach to managing future growth
  - Promoting resource efficient settlement patterns
  - Ensuring development contributes towards the necessary infrastructure improvements
  - Ensuring development provides the necessary community facilities
  - Targeting development to reflect the roles and functions of individual settlements
- 

### **Council Analysis**

The representation supports the eight themes underlying the Preferred Strategy which were identified following consultation on the three Alternative Strategies

---

### **Council Response**

This support is noted and welcomed.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

My Clients note the identification of the village of Llanbradach as within the Southern Connections Corridor in the south of the County Borough. In paragraph 6.20 it is acknowledged that it represents the County Borough's most attractive area to potential investors. The statement to the effect that a strategy which relies on the south of the County Borough for economic progress is unsustainable in the long term is, however, unqualified and is not supported by firm evidence.

Paragraph 6.21 states that "development opportunities in the Southern Connections Corridor and Caerphilly Town in particular are limited to brownfield sites." To restrict the development of a principal town and its satellite villages in this way is unsustainable as the town needs to maintain its status in the settlement hierarchy of South East Wales as a major retail, tourism and employment centre. Indeed, the need for Caerphilly to capitalize on its proximity to Newport and Cardiff is highlighted in paragraph 6.83. In that same paragraph, however, emphasis is again placed on the redevelopment of existing sites and not on the release of any substantial new Greenfield land.

The Caerphilly Unitary Development Plan (UDP) has been successful in preventing Greenfield development in the Caerphilly area, thus encouraging the development of the obvious brownfield sites. However, it is a fact that previously developed land is a finite resource and the availability of previously developed land in the Caerphilly area has diminished significantly. It is therefore considered that the LDP will need to identify Greenfield sites in Caerphilly Basin and Llanbradach to accommodate future housing needs. In reality, this can only be achieved by extending settlements in a sustainable way.

Paragraph 6.15 refers to other settlements in the County Borough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with a better mix of housing, together with suitable benefits to the community.

Land available in 2006 which could potentially be developed within a five year period, could accommodate 2,740 dwellings. On the basis of the anticipated new annual building requirement this only amounts to a supply for approximately 4 years. Notwithstanding efforts to accommodate higher rates of growth in the Heads of the Valley Regeneration Area, realistically, a high proportion of the annual building rate will continue in the Southern and Northern Connections Corridor areas identified.

My Clients would therefore wish to object to the Strategy document on the basis that it seeks to restrict growth in the Southern Connections Corridor, which includes Llanbradach, to brownfield sites. The settlement of Llanbradach needs to continue to provide a range and choice of housing sites to meet continuing requirements. My Client's site is part of a larger, comprehensive scheme on land which is partially brownfield and is in a sustainable location within a reasonable distance of a range of local facilities and services, including public transport.

My Clients also object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this

would be more appropriate in a village such as Llanbradach where a sympathetic scheme at key entry point into the village off the A469 could create and enhance its identity.

---

### **Council Analysis**

The Deposit LDP has sought to allocate suitable development sites in the north of the Borough to promote regeneration of the area. However, this is not at the expense of either the Northern or the Southern Corridors where substantial development is still envisaged. However, having assessed all potential sites in these areas it was not considered appropriate to advance greenfield sites in Llanbradach in preference to more sustainable choices in the southern connections corridor, and this decision is fully in accord with the aims of the development strategy of the Plan.

---

### **Council Response**

The Deposit LDP has sought to allocate suitable development sites in the north of the Borough to promote regeneration of the area. However, this is not at the expense of either the Northern or the Southern Corridors where substantial development is still envisaged. However, having assessed all potential sites in these areas it was not considered appropriate to advance greenfield sites in Llanbradach in preference to more sustainable choices in the southern connections corridor, and this decision is fully in accord with the aims of the development strategy of the Plan.

---

**Document:** LDP Strategy  
**Paragraph:**

**Section:** 7  
**Policy:** 1

**Page:** 039

---

### **Representation**

Policy SP1, which identifies land for development within and adjacent to existing towns and villages, is supported with particular regard to:

2. sustaining and promoting the specific role and function of individual settlements;
4. sustaining the vitality and viability of areas; and
5. developing and using land on the basis of our environmental, social and economic

needs.

---

### **Council Analysis**

The representation supports the proposed Sustainable Development Strategy Policy SP1 in the Preferred Strategy, which sets out the criteria for identifying land for development in the Plan.

The policy is not included within the Deposit LDP in the same form, but several of the criteria of the policy are included in the Strategy Policies of the Plan, and the criteria have provided the basis for the selection of the land allocations in the Plan.

---

### **Council Response**

This support is noted and welcomed.

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 9  
**Policy:**

**Page:**

---

### **Representation**

The identification of Ystrad Mynach as a principal town is noted, as is the function of the settlement as an administrative, health and further education centre. Paragraph 6.15 refers to other settlements in the County Brouough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported.

It is noted that Candidate sites E58, E63, E64, E65 and E66 generally have been considered favourably for preferred uses which include residential, mixed use and commuinity facilities. It is my Clients intention that the whole area should be developed comprehensively with enhanced community provision. Notwithstanding the complex planning history on the site it is considered that through the Local Development Plan process, a proper scheme to comprehensively develop the sites concerned could bring benefits to the surrounding area in the form of improvements to its identity and the provision of enhanced facilities. In this way it would meet sustainability and LDP Strategy objectives.

The Preferred Strategy is therefore generally supported, however, notwithstanding the provisions of paragraph 6.15, in some villages such as Cefn Hengoed, a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with an improved mix of housing, together with suitable benefits to the community. My Clients would therefore wish to object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in the context of my Clients candidate sites.

---

### **Council Analysis**

The representation identifies two issues. The first issue is support for the favourable consideration of the sites in question. With reference to site E58, the location of Cefn Hengoed Community Centre rather than Cefn Hengoed Youth Centre was identified in the Candidate Sites Register but the principle of redevelopment the community centre site was deemed appropriate subject to site being declared surplus. Given its community use, the community centre will not be identified for an alternative use but will be retained within the settlement boundary. The site of Cefn Hengoed Youth Centre fell below the site size threshold in the candidate site process so has not been considered as part of this process.

In the progression of work on the Deposit LDP, the wording of the strategy has changed and it is not therefore possible to add this statement into a directly related paragraph in the LDP Deposit. However, the issue of having regard to local distinctiveness is addressed in the Place Making strategy policy.

---

### **Council Response**

No amendment should be made in relation to either of the points raised

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 9  
**Policy:**

**Page:**

---

### **Representation**

The identification of Ystrad Mynach as a principal town is noted, as is the function of the settlement as an administrative, health and further education centre. Paragraph 6.15 refers to other settlements in the County Brouough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported.

It is noted that Candidate sites E58, E63, E64, E65 and E66 generally have been considered favourably for preferred uses which include residential, mixed use and commuinity facilities. It is my Clients intention that the whole area should be developed comprehensively with enhanced commuinity provision. Notwithstanding the complex planning history on the site it is considered that through the Local Development Plan process, a proper scheme to comprehensively develop the sites concerned could bring benefits to the surrounding area in the form of improvements to its identity and the provision of enhanced facilities. In this way it would meet sustainability and LDP Strategy objectives.

The Preferred Strategy is therefore generally supported, however, notwithstanding the provisions of paragraph 6.15, in some villages such as Cefn Hengoed, a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with an improved mix of housing, together with suitable benefits to the community. My Clients would therefore wish to object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in the context of my Clients candidate sites.

---

### **Council Analysis**

The representation identifies two issues. The first issue is support for the favourable consideration of the sites in question. The support for the favourable consideration of the site is mistaken as the site in question and the adjoining areas of land are not considered suitable for further consideration on the grounds of the visual impact of development, with Hengoed Avenue being considered a defensible boundary.

The second issue requires a paragraph on settlements retaining their distinctive identity to be expanded to incorporate the creation or enhancement of distinctive identiity. In the progression of work on the Deposit LDP, the wording of the strategy has changed and it is not therefore not possible to add this statement into a directly related pargraph in the LDP Deposit. However, the issue of having regard to local distinctiveness is addressed in the Place Making strategic policy.

---

### **Council Response**

No amendment should be made in relation to either of the points raised

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 9  
**Policy:**

**Page:**

---

### **Representation**

The identification of Ystrad Mynach as a principal town is noted, as is the function of the settlement as an administrative, health and further education centre. Paragraph 6.15 refers to other settlements in the County Brouough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported.

It is noted that Candidate sites E58, E63, E64, E65 and E66 generally have been considered favourably for preferred uses which include residential, mixed use and commuinity facilities. It is my Clients intention that the whole area should be developed comprehensively with enhanced commuinity provision. Notwithstanding the complex planning history on the site it is considered that through the Local Development Plan process, a proper scheme to comprehensively develop the sites concerned could bring benefits to the surrounding area in the form of improvements to its identity and the provision of enhanced facilities. In this way it would meet sustainability and LDP Strategy objectives.

The Preferred Strategy is therefore generally supported, however, notwithstanding the provisions of paragraph 6.15, in some villages such as Cefn Hengoed, a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with an improved mix of housing, together with suitable benefits to the community. My Clients would therefore wish to object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in the context of my Clients candidate sites.

---

### **Council Analysis**

The representation identifies two issues. The first issue is support for the favourable consideration of the sites in question. The support for the favourable consideration of the site is mistaken as the site in question and the adjoining areas of land are not considered suitable for further consideration on the grounds of the visual impact of development, with Hengoed Avenue being considered a defensible boundary.

The second issue requires a paragraph on settlements retaining their distinctive identity to be expanded to incorporate the creation or enhancement of distinctive identiity. In the progression of work on the Deposit LDP, the wording of the strategy has changed and it is not therefore not possible to add this statement into a directly related pargraph in the LDP Deposit. However, the issue of having regard to local distinctiveness is addressed in the Place Making strategic policy.

---

### **Council Response**

No amendment should be made in relation to either of the points raised

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 9  
**Policy:**

**Page:**

---

### **Representation**

The identification of Ystrad Mynach as a principal town is noted, as is the function of the settlement as an administrative, health and further education centre. Paragraph 6.15 refers to other settlements in the County Brouough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported.

It is noted that Candidate sites E58, E63, E64, E65 and E66 generally have been considered favourably for preferred uses which include residential, mixed use and commuinity facilities. It is my Clients intention that the whole area should be developed comprehensively with enhanced commuinity provision. Notwithstanding the complex planning history on the site it is considered that through the Local Development Plan process, a proper scheme to comprehensively develop the sites concerned could bring benefits to the surrounding area in the form of improvements to its identity and the provision of enhanced facilities. In this way it would meet sustainability and LDP Strategy objectives.

The Preferred Strategy is therefore generally supported, however, notwithstanding the provisions of paragraph 6.15, in some villages such as Cefn Hengoed, a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with an improved mix of housing, together with suitable benefits to the community. My Clients would therefore wish to object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in the context of my Clients candidate sites.

---

### **Council Analysis**

The representation identifies two issues. The first issue is support for the favourable consideration of the sites in question. The support for the favourable consideration of the site is mistaken as the site in question and the adjoining areas of land are not considered suitable for further consideration on the grounds of the visual impact of development, with Hengoed Avenue being considered a defensible boundary.

The second issue requires a paragraph on settlements retaining their distinctive identity to be expanded to incorporate the creation or enhancement of distinctive identiity. In the progression of work on the Deposit LDP, the wording of the strategy has changed and it is not therefore not possible to add this statement into a directly related pargraph in the LDP Deposit. However, the issue of having regard to local distinctiveness is addressed in the Place Making strategic policy.

---

### **Council Response**

No amendment should be made in relation to either of the points raised

---

**Document:** Candidate Site  
**Paragraph:**

**Section:** 9  
**Policy:**

**Page:**

---

### **Representation**

The identification of Ystrad Mynach as a principal town is noted, as is the function of the settlement as an administrative, health and further education centre. Paragraph 6.15 refers to other settlements in the County Brouough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported.

It is noted that Candidate sites E58, E63, E64, E65 and E66 generally have been considered favourably for preferred uses which include residential, mixed use and commuinity facilities. It is my Clients intention that the whole area should be developed comprehensively with enhanced commuinity provision. Notwithstanding the complex planning history on the site it is considered that through the Local Development Plan process, a proper scheme to comprehensively develop the sites concerned could bring benefits to the surrounding area in the form of improvements to its identity and the provision of enhanced facilities. In this way it would meet sustainability and LDP Strategy objectives.

The Preferred Strategy is therefore generally supported, however, notwithstanding the provisions of paragraph 6.15, in some villages such as Cefn Hengoed, a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with an improved mix of housing, together with suitable benefits to the community. My Clients would therefore wish to object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in the context of my Clients candidate sites.

---

### **Council Analysis**

The representation identifies two issues. The first issue is support for the favourable consideration of the sites in question. The support for the favourable consideration of the site is mistaken as the site in question and the adjoining areas of land are not considered suitable for further consideration on the grounds of the visual impact of development, with Hengoed Avenue being considered a defensible boundary.

The second issue requires a paragraph on settlements retaining their distinctive identity to be expanded to incorporate the creation or enhancement of distinctive identiity. In the progression of work on the Deposit LDP, the wording of the strategy has changed and it is not therefore not possible to add this statement into a directly related pargraph in the LDP Deposit. However, the issue of having regard to local distinctiveness is addressed in the Place Making strategic policy.

---

### **Council Response**

No amendment should be made in relation to either of the points raised

---

**Document:** LDP Strategy  
**Paragraph:** 6.15

**Section:** 6  
**Policy:**

**Page:**

---

### **Representation**

The identification of Ystrad Mynach as a principal town is noted, as is the function of the settlement as an administrative, health and further education centre. Paragraph 6.15 refers to other settlements in the County Brouough which are not defined as Principal Towns or Key Settlements. All other towns and villages are referred to as primarily residential areas. The emphasis within such areas on retaining their distinct identity; providing a choice of house types; and maintaining and creating attractive sustainable communities where people will want to work and live is generally supported.

It is noted that Candidate sites E58, E63, E64, E65 and E66 generally have been considered favourably for preferred uses which include residential, mixed use and commuinity facilities. It is my Clients intention that the whole area should be developed comprehensively with enhanced commuinity provision. Notwithstanding the complex planning history on the site it is considered that through the Local Development Plan process, a proper scheme to comprehensively develop the sites concerned could bring benefits to the surrounding area in the form of improvements to its identity and the provision of enhanced facilities. In this way it would meet sustainability and LDP Strategy objectives.

The Preferred Strategy is therefore generally supported, however, notwithstanding the provisions of paragraph 6.15, in some villages such as Cefn Hengoed, a need exists to create a better identity with improved local facilities. This could be achieved by encouraging an appropriate form of development, with an improved mix of housing, together with suitable benefits to the community. My Clients would therefore wish to object to the Strategy document on the basis that Paragraph 6.15 should be amended to "creating, retaining or enhancing their distinct identity" as this would be more appropriate in the context of my Clients candidate sites.

---

### **Council Analysis**

The representation identifies two issues. The first issue is support for the favourable consideration of the sites in question. The support for the favourable consideration of the site is mistaken as the site in question and the adjoining areas of land are not considered suitable for further consideration on the grounds of the visual impact of development, with Hengoed Avenue being considered a defensible boundary.

The second issue requires a paragraph on settlements retaining their distinctive identity to be expanded to incorporate the creation or enhancement of distinctive identiity. In the progression of work on the Deposit LDP, the wording of the strategy has changed and it is not therefore possible to add this statement into a directly related paragraph in the LDP Deposit. However, the issue of having regard to local distinctiveness is addressed in the Place Making strategy policy.

---

### **Council Response**

No amendment should be made in relation to either of the points raised

# ANNEX 2 - REPRESENTATIONS ON THE STRATEGIC ENVIRONMENTAL ASSESSMENT AND SUSTAINABILITY APPRAISAL

## ATODIAD 2 - SYLWADAU AR YR ASESIAD AMGYLCHEDDOL STRATEGOL A'R GWERTHUSIAD CYNALADWYEDD



## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S7

**Section:**

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Comment

---

### **Representation Summary:**

Little to argue with but note that the preferred strategy is not the highest scoring option.

---

### **Representation:**

This compares the likely environmental impacts of the different options for the LDP Preferred Strategy. There seems little to argue with although, interestingly, the Preferred Strategy is not necessarily the highest scoring option.

---

### **Desired Change:**

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mr Stephen Tillman  
Miller Argent (South Wales) Limited

---

**Rep No:** 1844.S3

**Section:**

**Page:**

**Officer:** Ralph Bourke

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Consideration of Energy in the plan fails to take account of the role of fossil fuels until alternatives are developed.

---

### **Representation:**

The Assessment of Preferred and Alternative Strategies includes references to 'Energy'. However, no attempt has been made in this assessment to take account of the need to continue with the production of energy from fossil fuels until alternative energy resources are sufficiently well developed to replace them in their entirety. The assessment only makes reference to increasing the use of renewable energy sources. Whilst this might well be a preferred aim of many, it is unrealistic to not to recognise the need to continue with the current regime that is currently sustained by fossil fuels until such time as it can be entirely sustained by such renewable sources. The transition has to be gradual and, at present, realistic expectations for renewable energy within the life of the proposed plan can only be in the order of between 10% and 25% of total energy needs.

Caerphilly is sitting on valuable energy reserves and Miller Argent feels that the present local plan assessment provides an unrealistic approach to sustainability.

---

### **Desired Change:**

---

### **Response:**

The aims of the plan are to encourage the increased use of renewable energy and reduce the amount of energy used. It should be taken as read the majority of energy supply will be supplied through fossil fuel based sources, as is the currently the case, and is in line with UK energy policy. A statement to this effect should be included in the baseline text of the scoping report.

---

### **Change to SEA/SA: Yes**

Paragraph CF3 should be amended to read as follows:

"This can be implemented through three main themes, a change in the way that energy is generated moving towards new renewable sources, a change in the way that we use energy by seeking to minimise use, and, preparing for the changes that climate change is likely to bring by reducing vulnerability to the effects of climate change, e.g flooding, disruption to travel by extreme weather, however energy production is likely to remain predominantly fossil fuel based throughout the plan period."

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S4**

**Section:**

**Paragraph: All**

**Page:**

**Rep Type: Comment**

**Officer: David Lucas**

---

### **Representation Summary:**

There are some queries regarding the assessment process and whether the process results are fully document and quality assured.

---

### **Representation:**

We have some queries on the assessment process. It appears that the Sustainability working group assessed the various plans against twenty tests derived from the SEA objectives. These results have been included in document 3. However, there is no evidence of a quality assurance process being adopted by the authority and we feel it is worth mentioning that under the terms of reference of this group, they are specifically described as an advisory group, not a decision making one. We therefore

would have expected some validation of their findings before publication, especially in terms of additional comments, mitigation and issues for the plan.

In addition, we are not clear whether all the assessments undertaken by the workshops have been presented here and it seems that some options were assessed on more occasions than others. This then leads us to question how the results in section 3 of this document were derived with all totals adding to 40 (2 x the 20 assessment tests), even though some of the options were assessed three times. We would also like to point out that the SEA Directive expressly calls for consideration of secondary, cumulative and synergistic effects arising from each of the options. We wonder whether these elements have been considered fully.

---

### **Desired Change:**

Clarification of whether the Assessment Test results have been quality assured, if all the results of the assessments have been included and whether secondary, cumulative and synergistic effects have been considered fully.

---

### **Response:**

CCW are a statutory consultee for SEA/SA and, as such, have been members of the Sustainability Group from the commencement of the SEA/SA work. The remit of the Sustainability Group is to provide expert input and detailed information into the SEA/SA process. As such it is concerning that CCW have been an integral part of the development of the SEA/SA to date and have not, until this time, raised these fundamental procedural concerns even though there has been ample opportunity to do so.

It is also clear from the comments that they have been made by officers other than those who have attended the Sustainability Group meetings, as there is an element of misinterpretation surrounding the processes. To clarify it should be noted that Terms of Reference for the Sustainability Group have been agreed. The Terms of Reference govern the role of of the group in the SEA/SA process. The Terms of Reference state: "The Working Group is an advisory Group, without decision making powers . . .". From this it is clear that the Group have no primary powers in the process and only make recommendations to the Council or the LDP Focus Group who do have the power to make

decisions. To make the situation clear, council officers have reviewed all the outcomes of each and every Sustainability Group meeting, including those relating to the generation of the assessment tests, reviewing the recommendations put forward by the Group. In addition the final decisions are made by either the Council or the LDP Focus group who consider reports from the meetings as the basis for decisions that they take. At no time has the Sustainability Group dictated content or approach for the SEA/SA.

In respect of the assessments undertaken by the group, they were considered against a set of assessments undertaken by the officers prior to the meeting as a control exercise. The assessments produced by the group were also reviewed by officers and found to be sound in their conclusions, and mitigation proposals, although some additional mitigation measures were included from the officer assessment. Overall the quality of the assessments resulting from the Sustainability Group exercise was more than sufficient for them to be included as the assessment of the alternative strategies in Document 3, and their role in the process highlighted accordingly. In addition in identifying and producing the assessment tests the input of the Group was very useful, but did not dictate the indicators themselves. The initial indicators were drafted by officers of the council and they were then tested against a random strategy (defined by officers) by the Group, with officers sitting in on the discussions. The Group's recommendations for change were considered by officers and found to be reasonable and resulted in better tests and so were incorporated into the document.

In respect of duplicating assessments, the council can confirm that the alternative strategies were only assessed by the Group once, at the meeting held on 31 January 2007. Prior to that the Assessment Tests were considered against officer derived strategies, that effectively were a set of principles for setting out a strategic framework rather than a complete strategy, in order to consider their relevance, effectiveness and robustness as assessment tests for the alternative strategies. At no time during the process of identifying the assessment tests was any of the alternative strategies used for testing.

Finally, in respect of secondary, cumulative and synergistic impacts required by the Directive, Paragraph 3.3 of Document 3 addresses this issue and states:

"The SEA Directive requires that the SEA assessment should not only consider the likely direct effects that the plan may have, but should also consider secondary, cumulative and synergistic effects as well. However it should be noted that the assessments are being taken at a strategic level that will, by their very nature, be highly integrated and are unlikely to realise any secondary, cumulative or synergistic effects of such significance as to be identifiable in the assessments. As such the assessment will not dwell on these aspects unless there is significant effect that warrants discussion."

---

**Change to SEA/SA: No**

No amendments be made in respect of this comment

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Ms Caroline Drayton  
Environment Agency Wales

---

**Rep No:** 2506.S2

**Section:**

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

A Strategic Flood Consequence Assessment and a Broad Level Assessment relevant to Strategic Sites should be undertaken.

---

### **Representation:**

The role of the LDP is to set out a strategic spatial strategy and strategic policies. The preferred strategy does not deal with site specific issues and so accordingly the baseline information is provided at a scale which remains strategic but relevant to district level.

The strategy, policies and allocations and consideration of alternatives should be founded on a robust and credible evidence base, in order to meet the test of soundness (CE2 - coherence and effectiveness test).

Flooding/flood risk is an identified environmental issue and is also a strategic issue. It is not clear from the information provided, however, whether flood risk is an issue that significantly constrains development options (proposed key sites and growth areas). It is not clear whether the options have been objectively assessed and supported by evidence. A Strategic Flood Consequence Assessment and a Broad Level Assessment relevant to strategic sites should be undertaken

---

### **Desired Change:**

A Strategic Flood Consequence Assessment and a Broad Level Assessment relevant to Strategic Sites should be undertaken and the findings incorporated into the Assessment process.

---

### **Response:**

The pre-deposit LDP consultation required that any strategic sites be the subject of consultation along with the Strategy itself. The Pre-deposit Strategy document does not identify any strategic sites as the Council does not believe that there are any strategic sites that are likely to be allocated in the LDP. The functional analysis of the county borough has identified three orders of settlement within the county borough, i.e. principle towns (main centres offering a wide variety of services with a large hinterland), key Settlements (towns offering lesser numbers of services with a local hinterland) and other settlements (whose role is primarily as residential areas). The strategy identifies that development throughout the County Borough will be related to function and focussed where development would derive benefit to a community by virtue of making them more sustainable or increasing provision or improving efficiency of using the existing provision of services. However the identification of Principal and Key settlements in no way identifies them as foci for development. Consequently the Strategy only identifies the broad principles of spatial distribution for development, not providing a detailed account of where development will eventually be located.

In the absence of identified sites, or even specific areas where development will be focussed, it seems questionable whether a flood consequence assessment would actually derive any relevant information other than what is already known, i.e. flood risk areas are the valley floors due to the

topography of the valleys themselves. The Council accept and agree that flooding is an issue that needs to be considered when preparing the LDP, particularly in the allocation of development sites. In addition flooding is an important issue that needs to be addressed through the SEA/SA. The background to the Water section in the Scoping Report sets the background and identifies the nature and fluctuations of fluvial level and flooding in general terms.

It is accepted that the issue fo flooding will need to be specifically adressed in the SEA/SA assessment of the detailed LDP and undoubtedly there will be one, if not more, assessment tests relating to the flooding issue contained in Part 2 of the SEA/SA.

The Council are happy that the issue of flooding on the strategic level is adequate for the information outlined in the LDP Strategy document. The Council also acknowledges that flood risk will need to be an integral and detailed consideration of the emerging LDP and its allocations. The Council are happy that detailed consideration of flood issues be undertaken where detailed information on the plan strategy and the spatial distribution fo allocated sites is better known.

---

**Change to SEA/SA: No**

No change be made in respect of these comments.

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Ms Caroline Drayton  
Environment Agency Wales

---

**Rep No:** 2506.S3

**Section:**

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Infrastructure capability should also be considered in respect of strategic sites and growth areas.

---

### **Representation:**

Consideration must also be given to the infrastructure capabilities of the proposed key sites for growth and potential requirements for improvement and phasing of development.

---

### **Desired Change:**

Infrastructure capability should also be considered in respect of strategic sites and growth areas.

---

### **Response:**

Infrastructure capacity is considered in the background section on material assets. Given that Part 1 of the SEA/SA considers the strategic elements of the emerging plan, the issue of infrastructure capacity has been considered in general terms for the county borough as a whole. In this instance no issues have been identified in respect of potential problems in accommodating the general levels of development identified in the LDP Strategy.

The pre-deposit LDP consultation required that any strategic sites be the subject of consultation along with the Strategy itself. The Pre-deposit Strategy document does not identify any strategic sites as the Council does not believe that there are any strategic sites that are likely to be allocated in the LDP. The functional analysis of the county borough has identified three orders of settlement within the county borough, i.e. principle towns (main centres offering a wide variety of services with a large hinterland), key Settlements (towns offering lesser numbers of services with a local hinterland) and other settlements (whose role is primarily as residential areas). The strategy identifies that development throughout the County Borough will be related to function and focussed where development would derive benefit to a community by virtue of making them more sustainable or increasing provision or improving efficiency of using the existing provision of services. There is no indication given as to where development will be located and as such it is not possible to analyse infrastructure capacities over and above the strategic assessment that has been done. More detailed assessments will need to be undertaken upon identifying specific sites, and issues of infrastructure capacity will be a consideration in allocating appropriate sites in appropriate locations.

---

### **Change to SEA/SA: No**

No change be made to the documents in respect of these comments.

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S5

**Section:** 3

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Support

---

**Representation Summary:**

WAG supports test number 14 as it demonstrates that the Preferred Strategy has performed well with regards to it

---

**Representation:**

SA Document 3, Appendix 2 Assessment Test no. 14 Soil quality! quantity and permeability demonstrates that the Preferred Strategy performs well in this regard.

---

**Desired Change:**

N/A

---

**Response:**

No further action required

---

**Change to SEA/SA:** No

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mr Nigel Ajax-Lewis  
Wildlife Trust of South & West Wales

---

**Rep No:** 2215.S2

**Section:** 5

**Page:** 017

**Officer:** David Lucas

**Paragraph:** 16

**Rep Type:** Objection

---

### **Representation Summary:**

Change the assessment test to say "safeguard and enhance"

---

### **Representation:**

Assessment Test

Should read safeguard and enhance the biodiversity of the County Borough because Caerphilly's biodiversity habitat targets are:

- 1 No loss of existing biodiversity resource
  - 2 Achieve favourable conditions of (1)
  - 3 Restore habitat in unfavourable condition (additional to (1))
  - 4 Expand area of habitat (additional to (1))
- 

### **Desired Change:**

Amend the assessment test to say "Safeguard and enhance the biodiversity of the County Borough"

---

### **Response:**

Whilst the LBAP is an important consideration in producing the plan, and the LDP will seek to maintain and enhance the existing nature conservation interest of the county borough, it should be noted that the LBAP is not a planning document. As such the LBAP takes into account factors that the LDP has no control or influence over. It would be inappropriate to subject the LDP to scrutiny by the use of criteria that the LDP cannot influence or respond to. Consequently the assessment tests, which have been produced from the sustainability objectives laid out in the Scoping Report, should not be based upon criteria derived directly from the LBAP, but should be considered against criteria that are designed to test the effects that the LDP will realise.

The issue of safeguard (or maintain) and enhance is one that has been the subject of significant consideration in producing the SEA/SA Part 1. During these considerations it has been decided that safeguarding and enhancing are two separate objectives that are not mutually compatible. Consequently it is the Council view that an objective or test should relate to either the safeguarding, or the maintenance of any factor, not both. The current assessment test is the safeguarding of the biodiversity of the county borough, and the council are satisfied that test reflects the sustainability objective from which it is derived.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this objection.

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S1

**Section:** 5

**Page:** 015

**Officer:** David Lucas

**Paragraph:** AT2

**Rep Type:** Objection

---

### **Representation Summary:**

The test is the same before and after the Sustainability Group Changes.

---

### **Representation:**

2 Housing Issue

In view of the Change by the Sustainability Group, the text is defective in that the entry in the Final Assessment Tests box is exactly the same as in the Assessment Test box.

---

### **Desired Change:**

The text be amended so that the change can be seen.

---

### **Response:**

This is a typing error. The original version of the Assessment Test has been replaced by the revised version. The original version should be included in the column titled 'Assessment Test'

---

### **Change to SEA/SA: Yes**

For AssessmentTest 2 - Housing, the cell headed 'Assessment Test' should be reworded as follows:

"Provide a sufficient amount and mix of housing to sustain communities."

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S2

**Section:** 5

**Page:** 015

**Officer:** David Lucas

**Paragraph:** AT3

**Rep Type:** Objection

---

### **Representation Summary:**

The test is the same before and after the Sustainability Group Changes.

---

### **Representation:**

3 Education Issue

In view of the Change by the Sustainability Group, the text is defective in that the entry in the Final Assessment Tests box is exactly the same as in the Assessment Test box.

---

### **Desired Change:**

The text be amended so that the change can be seen.

---

### **Response:**

This is a typing error. The original version of the Assessment Test has been replaced by the revised version. The original version should be included in the column titled 'Assessment Test'

---

### **Change to SEA/SA: Yes**

For AssessmentTest 2 - Housing, the cell headed 'Assessment Test' should be reworded as follows:

"Provide a range of educational opportunities.."

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S3

**Section:** 5

**Page:** 017

**Officer:** David Lucas

**Paragraph:** AT14

**Rep Type:** Objection

---

### **Representation Summary:**

The test is the same before and after the Sustainability Group Changes.

---

### **Representation:**

- 1 Soils
- 2 Geology

In view of the Change by the Sustainability Group, the text is defective in that the entry in the Final Assessment Tests box is exactly the same as in the Assessment Test box.

---

### **Desired Change:**

The text be amended so that the change can be seen.

---

### **Response:**

The original and final versions fo the assessment test are not t he same. The original seels to ensure the efficient use, whilst the final versions seeks the effective use. This is the change in emphasis that that was sought.

---

### **Change to SEA/SA: No**

No change be made in respect of this representation.

## SEA/SA 3: Assessment of the Preferred & Alternative Strategies

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S4

**Section:** 7

**Page:** 035

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

The description at the bottom of the Option A Box should say '2nd Least Sustainable'

---

### **Representation:**

At the bottom of the Option A – The UDP Strategy box, the text should read:

Second least sustainable

---

### **Desired Change:**

The description at the bottom of the Option A Box should say '2nd Least Sustainable'

---

### **Response:**

It is better english to reword the statement in the manner suggested by the respondent.

---

### **Change to SEA/SA: Yes**

The summary at the foot of the 'Option A -The UDP Strategy' should be reworded as follows:

"2nd Least Sustainable"

## Preferred Strategy

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S5**

**Section: 9**

**Page: 044**

**Officer: David Lucas**

**Paragraph: 9.6**

**Rep Type: Objection**

---

### Representation Summary:

The paragraph ought to be rephrased to more accurately reflect Article 1 of the SEA Directive

---

### Representation:

We are concerned by a statement within the LDP Preferred Strategy document which states that ‘it should be noted that it is not the role of the SEA/SA to produce a truly sustainable plan; rather it is incorporated in decision making with the result of making the LDP more sustainable’ (paragraph 9.6).

While we support the reference to the SEA being a tool for decision making, the objectives of an SEA are clearly stated within the Directive as ‘to provide for a high level of protection of the environment’ and ‘to promote sustainable development’ (Article 1 of the SEA Directive). We feel that the statement ought to be revised to reflect this.

---

### Desired Change:

Paragraph 9.6 should be rephrased to incorporate the objectives of SEA stated in Article 1 of the SEA Directive.

---

### Response:

This statement has been specifically included to advise the role and function of the SEA/SA, especially in respect of how the SEA/SA amends the LDP. The support for the reference to the SEA/SA as a tool to aid decision making is noted. It is accepted that the paragraph does not accurately reflect the wording of the Directive, although the intention is the same. Consequently the paragraph would be better worded to accord with the wording of the Directive, whilst maintaining its intention.

---

### Change to SEA/SA: Yes

Paragraph 9.6 of the LDP be amended to read as follows:

"The critical part of the whole process is how the results of the assessment influence and change the LDP, making it more sustainable. It should be noted that the role of the SEA/SA is to provide for a high level of protection for the environment and to promote sustainable development. As such the SEA/SA is a tool to aid decision making and, whilst a very important consideration in determining the content of the LDP, it forms one of many considerations that must be taken into account in producing the LDP. Consequently, whichever of the Strategy Options is used as the basis for the LDP, all of them would require changes to seek to change the negative and neutral results to positive ones. These changes usually take one of two forms:

I Changes to the text of the document. Commonly used to clarify how the strategy is applied or to address issues that have not been addressed.

II Mitigation, i.e. the provision of some form of gain that will compensate for a negative impact that cannot be changed.

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S37

**Section:** 12

**Page:** 204

**Officer:** David Lucas

**Paragraph:** AT13

**Rep Type:** Objection

---

### **Representation Summary:**

The mitigating statement should be reworded to improve compliance with TAN 15 and include named places where development will be directed away from.

---

### **Representation:**

The mitigating statement against test 13 should be reworded to improve its compliance with TAN 15 and make a statement about directing 'new development away from those areas which are at high risk of flooding' unless it satisfies the criteria in sections 6 or 7 of the TAN. We believe that including named areas where development should be directed away from, will help to ensure a more sustainable plan, recognising that some areas are no longer suitable for development.

---

### **Desired Change:**

The mitigating statement should be reworded to improve compliance with TAN 15 and include named places where development will be directed away from.

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text and content of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

It is accepted that the strategy will need to address the flooding issue more directly. However, whilst a change could be made in respect of this comment, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable text will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S45

**Section:** 12

**Page:** 206

**Officer:** David Lucas

**Paragraph:** AT19

**Rep Type:** Objection

---

### **Representation Summary:**

Include the encouragement of use of renewables produced outside of the authority.

---

### **Representation:**

This section should also encourage the use of renewables within the county that have been produced elsewhere.

---

### **Desired Change:**

Include the encouragement of use of renewables produced outside of the authority.

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

Whilst a change could be made to include a statement in this respect, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable text will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S44

**Section:** 12

**Page:** 206

**Officer:** David Lucas

**Paragraph:** AT19

**Rep Type:** Objection

---

### **Representation Summary:**

Include consideration of full range of renewable energy technologies.

---

### **Representation:**

Consideration of the full range of renewable energy technologies, including biofuels, microgeneration and hydro-power should be included in the discussion surrounding test 19, as TAN 8 does not refer solely to wind farms.

---

### **Desired Change:**

Include consideration of full range of renewable energy technologies.

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

It is accepted that references to renewable energy should include all forms of production. However, whilst a change could be made to include a statement in this respect, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable text will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## Preferred Strategy Appendices

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S43**

**Section: 12**

**Page: 205**

**Officer: David Lucas**

**Paragraph: AT17**

**Rep Type: Comment**

---

### **Representation Summary:**

here may also be actions that could occur through the county in terms of offsetting the carbon costs of new builds

---

### **Representation:**

There may also be actions that could occur through the county in terms of offsetting the carbon costs of new builds and we refer you to the consultation on the Climate Change Action Plan.

---

### **Desired Change:**

Include reference to the potential of carbon offsetting beyond development sites.

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

It is true that other off development measures to offset the carbon costs of new development could be undertaken within, or possibly beyond, the County borough. Whilst this is not the preferred option, the potential for this, as a supplement to on-site measures, could be referenced within the text. However, whilst a change should be made to include a statement in this respect, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable text will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S42

**Section:** 12

**Page:** 205

**Officer:** David Lucas

**Paragraph:** AT17

**Rep Type:** Objection

---

### **Representation Summary:**

Reference be made to the Community Strategy work on encouraging the uptake of environmental management systems.

---

### **Representation:**

We would also suggest that reference could be made here to the work undertaken through the community strategy process in terms of existing builds and encouraging the uptake of environmental management systems.

---

### **Desired Change:**

Reference be made to the Community Strategy work on encouraging the uptake of environmental management systems.

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

Whilst a change could be made to accommodate the comment, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable text will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S35

**Section:** 12

**Page:** 203

**Officer:** David Lucas

**Paragraph:** AT12

**Rep Type:** Objection

---

### **Representation Summary:**

Greater reference to the commitment in the SEA in respect of Water should be made.

---

### **Representation:**

On test 12, we suggest that more could be stated here to ensure commitment of the preferred strategy to the SEA objective on water. A statement such as 'no new development will have a negative impact on the quantity or quality of the county's water resource' is suggested.

---

### **Desired Change:**

---

### **Response:**

It is felt that the aims of the test and supporting text are sufficient in so much that it seeks to protect both water resources and quality and allows sites to be assessed individually. The representor's proposed wording is considered too prescriptive as it would allow no negative impacts and whilst these may not be desirable there may be instances where an amount is acceptable.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment

---

## Preferred Strategy Appendices

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S50

**Section:** 12

**Page:** 203

**Officer:** David Lucas

**Paragraph:** 14

**Rep Type:** Objection

---

### **Representation Summary:**

Agricultural interest is a novel one in terms of valued aspects of the natural environment.

---

### **Representation:**

Page 203, section 14 - the agricultural interest included in the corresponding right hand box, against paragraph 6.41, is a novel one in terms of valued aspects of the natural environment.

---

### **Desired Change:**

---

### **Response:**

In this context the term "natural environment" is being used as the opposite to "built environment". Government guidance requires that agricultural land grades 1, 2 and 3a should be protected for their agricultural quality. As such it is quite right, in this context, for the natural environment to include land with agricultural interest as a valued aspect.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this response.

## Preferred Strategy Appendices

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S41**

**Section: 12**

**Page: 225**

**Officer: David Lucas**

**Paragraph: AT17**

**Rep Type: Objection**

---

### **Representation Summary:**

Question what the baseline is for the CO2 reduction target and how it relates to the desire to reduce emissions by 20% overall.

---

### **Representation:**

We welcome the aspiration to reduce CO2 emissions by 10% in new developments, but question what the baseline measure would be. We also wonder how this links to the desire to reduce overall CO2 emissions for the county by 20% by 2010, given that the largest reductions should be from careful design of new builds.

---

### **Desired Change:**

Clarification of the baseline figure and relationship to the 20% reduction stated in the Target to CF1a.

---

### **Response:**

The 20% reduction remains a government target, set in 1997, and as such is used as an indicator. Less than 15% of CO2 emissions come from residential use and as such policy SP5 which seeks a reduction in CO2 emissions of at least 10% in new development is only a part of where reductions can be achieved. Energy production itself and road transport are likely to be two areas where other large reductions could be achieved. The baseline for the reduction in new development within the County borough will be when the LDP is adopted as the appropriate plan although figures prior to this date will be available for comparison.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S39

**Section:** 12

**Page:** 204

**Officer:** David Lucas

**Paragraph:** AT16

**Rep Type:** Support

---

### **Representation Summary:**

Welcome the statements on the need to maintain green corridors.

---

### **Representation:**

We welcome the statements under test 16 on the need to maintain and create green corridors in the light of climate change, both within the county borough and in the surrounding sub-region. We recognise this as a positive approach to ensuring biodiversity gain in future decades.

---

### **Desired Change:**

### **Response:**

The support for the inclusion of statements on the need to maintain green corridors is noted.

---

**Change to SEA/SA:** No

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S36

**Section:** 12

**Page:** 203

**Officer:** David Lucas

**Paragraph:** AT12

**Rep Type:** Objection

---

### **Representation Summary:**

Include a statement on water efficiency measures in new developments.

---

### **Representation:**

There could also be a statement on water efficiency measures within new developments, such as rainwater harvesting systems.

---

### **Desired Change:**

Include a statement on water efficiency measures in new developments.

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

It is accepted that water efficiency measures could be referenced in the text. However, whilst a change should be made to include a statement in this respect, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable text will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## Preferred Strategy Appendices

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S9

**Section:** 12

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Appendix contains insufficient mitigation to sa issues of minerals, flood risk and waste

---

### **Representation:**

Appendix 12 and the mitigation identified to the preferred strategy contains insufficient response to the SA issues of mineral resources, flood risk and waste raised by the appraisal process and this is reflected in the preferred Strategy.

---

### **Desired Change:**

reconsider preferred strategy mitigation and strategic policy

---

### **Response:**

The Council note this representation and will reconsider preferred strategy mitigation and strategic policy in relation to mineral resources, flood risk and waste in the development of the deposit plan

---

**Change to SEA/SA:** No

## Preferred Strategy Appendices

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S40

**Section:** 12

**Page:** 204

**Officer:** David Lucas

**Paragraph:** AT16

**Rep Type:** Objection

---

### **Representation Summary:**

Statement on S106 agreements should be related to policy SP3, not SP9

---

### **Representation:**

However, we wonder whether the subsequent statement on section 106 agreements is more applicable to the Protection Policy (SP3), rather than SP9.

---

### **Desired Change:**

Statement on S106 agreements be deleted in respect of Policy SP9 and included in respect of Policy SP3

---

### **Response:**

This comment, although submitted in respect of the Assessment of the Preferred and Alternative Strategies, actually relates specifically to the text of the preferred strategy document. Consequently this comment is more appropriately considered in respect of the Preferred Strategy text.

Whilst a change could be made to accommodate this comment, the Strategy has been the subject of significant comment and needs to be considered in a holistic context. As such it would be appropriate for this issue to be considered as part of the process of addressing the Strategy as a whole and, if appropriate, suitable references will be incorporated in respect of the issue.

---

### **Change to SEA/SA: No**

The issue be considered as part of the process of addressing the Strategy as a whole and, if applicable, additional text should be included.

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S11

**Section:**

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Comment

---

**Representation Summary:**

WAG note that doc 2 contains the review of relevant plans, policies and programmes

---

**Representation:**

The SEA/SA Part 1 Doc 2 also contains the review of Relevant Plans, Policies & Programmes.

---

**Desired Change:**

N/A

---

**Response:**

No further action required

---

**Change to SEA/SA:** No

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S4

**Section:**

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Comment

---

### **Representation Summary:**

WAG acknowledge that document 3 refers to WAG publication Farming for the Future

---

### **Representation:**

We note that the SA Document 2 identifies the Assembly policy publications Farming for the Future and a Working Countryside for Wales, with support for improving the competitiveness of agriculture, including the need to meet modern animal welfare standards and environmental safeguards, and the importance of off farm and diversified income to allow farming families to continue to fulfill their valued role in the countryside.

---

### **Desired Change:**

N/A

---

### **Response:**

No further action required

---

**Change to SEA/SA:** No

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S29

**Section:** 1

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

The title should be changed to the EU Habitats and Species Directive

---

### **Representation:**

The full title of the EU Habitats Directive is the EU Habitats and Species Directive.

---

### **Desired Change:**

Amend the reference to "EU Habitats Directive" state "EU Habitats and Species Directive"

---

### **Response:**

The title of the document has been referenced incorrectly and should be amended.

---

### **Change to SEA/SA: Yes**

Amend the reference to "EU Habitats Directive" state "EU Habitats and Species Directive"

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Nigel Ajax-Lewis  
Wildlife Trust of South & West Wales

---

**Rep No:** 2215.S3

**Section:** 2

**Page:** 012

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Natural Environment and Rural Communities Act 2006 and its provisions are omitted.

---

### **Representation:**

Natural Environment and Rural Communities Act 2006 is missing.

Part 3: Clauses 40 and 42 of which repeal S.74 of the Countryside and Rights of Way Act, and Part 4 adds protect and duties to existing SSSI legislation.

Clause 40 adds a Biodiversity duty to caerphilly CCBC (see [www.biodiversitywales.org.uk/english/library/default.aspx?pid=13](http://www.biodiversitywales.org.uk/english/library/default.aspx?pid=13))

---

### **Desired Change:**

Add reference to NERC Act where appropriate, as in supporting documents for UK Biodiversity Action Plan.

---

### **Response:**

The Review of Relevant Plans programme and Policies is a document that will evolve through the plan process, as new legislations, plans and guidance comes forward. It is appropriate to include the relevant provision from the Natural Environment and Rural Communities Act 2006 within the document. Where appropriate reference to the Act will be made in the LDP.

---

### **Change to SEA/SA: Yes**

The Review of Relevant Plans, Programmes and Policies be amended by the inclusion of the Natural Environment and Rural Communities Act 2006 into the National Section.

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S5

**Section:** 2

**Page:** 021

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Include the objective relating to maintaining and enhancing the historic environment

---

### **Representation:**

A Countryside Strategy for Caerphilly County Borough Objective set to maintain and enhance the quality of the historic environment.

---

### **Desired Change:**

Include the Objective set to maintain and enhance the quality of the historic environment.

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S4

**Section:** 2

**Page:** 021

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

No acknowledgement of objectives for Historic landscape and building stock in the Environment Strategy for Wales summary

---

### **Representation:**

Environment Strategy for Wales There is no acknowledgement of the objectives set in the Environment Strategy for Wales to maintain and enhance the historic landscape and historic building stock.

---

### **Desired Change:**

Include a reference to the objectives set in the Environment Strategy for Wales to maintain and enhance the historic landscape and historic building stock.

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S27

**Section:** 2

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Include the WAG Climate Change Adaptation Plan, Valleys Regional Park Plan, Water Compant Asset Management Plan 5 and Draft Climate Change Bill

---

### **Representation:**

We are pleased with the level of detail in the PPP review but would suggest the inclusion of the following additional policies, plans or policies;

- 1 WAG Climate Change Adaptation Action Plan
  - 2 Valleys Regional Park Plan
  - 3 Water Company Asset Management Plan 5
  - 4 Draft Climate Change Bill
- 

### **Desired Change:**

Include the WAG Climate Change Adaptation Plan, Valleys Regional Park Plan, Water Compant Asset Management Plan 5 and Draft Climate Change Bill

---

### **Response:**

The Review of Relevant Plans Policies and Programmes (RRPPP) will need to be the subject of ongoing review and updating as new legislation and guidance is issued throughout the LDP process, in order to ensure it is kept up-to-date. We are grateful for the identification of the above documents that should be incorporated into the RRPPP.

---

### **Change to SEA/SA: Yes**

The National/Regional section of the RRPPP be amended by the inclusion of the reviews of the Draft Climate Change Bill and the WAG Climate Change Adaptation Action Plan, and the Local section be amended by the inclusion of the reviews of the Valleys Regional Park Plan and the Water Company Asset Management Plan 5.

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S28

**Section:** 3

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Include UDPs and LDPs of adjoining authorities

---

### **Representation:**

We are pleased with the level of detail in the PPP review but would suggest the inclusion of the following additional policies, plans or policies;

The UDPs and LDPs of neighbouring local authorities

---

### **Desired Change:**

Include reviews of the UDPs and LDPs of adjoining local authorities.

---

### **Response:**

The Review of Relevant Plans Policies and Programmes (RRPPP) will need to be the subject of ongoing review and updating as new legislation and guidance is issued throughout the LDP process, in order to ensure it is kept up-to-date. We are grateful for the identification of the above documents that should be incorporated into the RRPPP.

---

### **Change to SEA/SA: Yes**

The Local section of the RRPPP be amended by the inclusion of the reviews of the extant development plans of the adjoining authorities.

## SEA/SA 2: Review of Relevant Plans, Programmes & Policies

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S6

**Section:** 4

**Page:** 051

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Comment

---

### **Representation Summary:**

All objected relating to historic environment have been identified, but are not reflected in the Strategy.

---

### **Representation:**

Planning Policy Wales

All objectives relating to conserving the historic environment contained in Planning Policy Wales have been used. The conclusion is that the LDP must set out policy to preserve and enhance the historic environment. There is however little reference in the Preferred Strategy to the historic environment.

---

### **Desired Change:**

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S2**

**Section:**

**Paragraph: All**

**Page:**

**Rep Type: Objection**

**Officer: David Lucas**

---

### **Representation Summary:**

Previous comments raised the possibility mismatches between the Community Plan and the SEA/SA. Have these been ratified.

---

### **Representation:**

As in our letter of the 18th July 2006, we welcome the efforts to link the LDP production with the Community Strategy through identifying similar issues and objectives within this SA/SEA. However, we wonder whether our point made in that response to the draft scoping report has been taken on board and any mismatches ratified.

---

### **Desired Change:**

Any mismatches between the Community Plan and SEA/SA be ratified.

---

### **Response:**

Welcome the support and acknowledgement of linking LDP production to the Council's Community Strategy.

During the Statutory Consultee Involvement process of the SEA/SA CCW made a similar comment relating to mismatches between the Community Plan and the LDP. At the meeting between officer of the Council and representatives from CCW held on August 4 2006, this issue was discussed. At that time CCW were not able to identify any specific conflicts and as such it was not possible to instigate direct action to rectify anything specific. Consequently the following response was given to the original comment:

"The Draft scoping report has been produced with the involvement of the Council's community planning team. The Community Planning Team have had direct input to the content of the Scoping Report and have advised on many of the indicators and objectives that have been included.

It is not contested that there may be inconsistencies between the two documents. However, the council will seek to identify the inconsistencies and work them out through the LDP process and the community plan review process. In terms of the Scoping Report, and the subsequent assessment process, the report will be the subject of a formal consultation period in April 2007 (as part of the consultation on the preferred strategy for the LDP), following which the Scoping Report will be amended to include changes that will ameliorate inconsistency."

This remains the case and representatives from the planning Division and the Community Planning team are continually liaising to resolve any conflicts or issues that arise. If CCW were to identify any specific or particular inconsistencies then the Council would consider them and seek to resolve them in the LDP and Community Plan processes. It should also be noted that the SEA/SA and the Community Plan are not related documents, are produced under differing legislative requirements and are not required to address the same things. Consequently there is no requirement for them to

match. However the SEA/SA has taken account of the Provisions of the Adopted Community Plan, indeed involving officers from the Team responsible for its production, and it is the intention to continue active liaison between the Community Plan Team and the LDP/SEA team to ensure better conformity between the two documents.

---

**Change to SEA/SA: No**

No change be made in respect of this comment

## SEA/SA 1: Scoping Report

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S37

**Section:**

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Comment

---

### **Representation Summary:**

The scoping report correctly identifies that the best agricultural soils lie in the south of the plan area

---

### **Representation:**

The SA Scoping Report (Geology and Soils) correctly identifies that the best agricultural soils lie in the south of the plan area, with a stated target of no loss of best and most versatile agricultural land. There is a good chance that this target is achievable.

---

### **Desired Change:**

N/A

---

### **Response:**

No further action necessary

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S61

**Section:**

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Comment

---

### **Representation Summary:**

Issue of flood risk is identified in SA/SEA but reiterates national policy and doesn't make clear the ramifications of decisions in delivering PS

---

### **Representation:**

Flood risk

The issue of flood risk is identified in SEA/SA, and as part of site assessment methodology and seems to be carried through into site assessment. Paragraph 6.32 alludes to decisions with regard to the floodplain and the need to balance social and economic benefits. This doesn't go any further, however, than national policy and it isn't clear what ramifications these types of decisions will have in delivering the preferred strategy.

---

### **Desired Change:**

Consider local climate change mitigation issues in relevant strategic policy

---

### **Response:**

Further consideration will be given to the range and extent of targets and measures to be set in the LDP to cope with the effects of climate change over the lifetime of new development, referring directly to government guidance. This guidance and examples of best practice will provide the basis of deciding the scope and extent of a revised policy.

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector: Mr Stephen Tillman**  
**Miller Argent (South Wales) Limited**

---

**Rep No: 1844.S2**

**Section:**

**Page:**

**Officer: Ralph Bourke**

**Paragraph:**

**Rep Type: Objection**

---

### **Representation Summary:**

The Scoping Report fails to identify the issue of protection of aggregates and minerals as required by Government Guidance

---

### **Representation:**

The Scoping Report hasn't properly identified the issue of any need to protect aggregates and minerals for potential future working. It makes brief reference to potential future working in lists of issues at the close of certain sections, but the need to protect such reserves in line with Government Guidance is as much an issue to identify within the scoping report as is the actual potential working of reserves. Even if not worked within the plan period, the Strategic Environmental Assessment will need to consider the National need to protect such reserves for future generations.

---

### **Desired Change:**

Figs 12, 13 and 14 should be complemented with figures showing the identified aggregate and coal deposits within the county borough and the scoping report should be revised to reflect the potential of these reserves being worked at some time in the future and the need for their protection.

---

### **Response:**

Mineral and coal deposits are important issues for the Geology and geomorphology section of the Scoping Report. As such a plan outlining the known mineral reserves and the licenced coal areas should be included in the Scoping Report. In addition, reference to the safeguarding of unworked coal and minerals for now and future generations should also be included.

---

### **Change to SEA/SA: Yes**

That the Geology and Geomorphology section of the Scoping Report be amended by

1 The inclusion of a map showing the known minerals deposits and coal license areas

2 Paragraph G9 be amended to read as follows:

There are a number of aggregate extraction sites which are either active or have the ability to become active again. The largest of these active quarries are Gelligaer and Machen Quarries. The former extracting primarily pennant sandstone and the latter limestone. Large scale opencasting for coal has historically taken place in the north of the County borough where outcrops are near the surface. Government guidance advises that mineral and coal deposits should be safeguarded and protected to ensure their potential for working when national needs require, even beyond the plan period.

## SEA/SA 1: Scoping Report

---

**Objector:** Ms Caroline Drayton  
Environment Agency Wales

---

**Rep No:** 2506.S1

**Section:**

**Paragraph:** W2

**Page:** 042

**Rep Type:** Objection

**Officer:** David Lucas

---

### **Representation Summary:**

Include text relating to the reference to Zones C1 and C2 on flood risk.

---

### **Representation:**

As requested in our previous letter of 12 July 2006, we would wish to see the inclusion of the following paragraphs within Section W2, following on from the reference to Zones C1 and C2 throughout the Borough:

Where flooding is a strategic issue that significantly constrains development options, local authorities should use the precautionary framework as part of considering sustainability options and, where necessary, set out the positive steps which have been taken to promote development in zones A and B.

The requirements of TAN15 will be a material factor in the formulation of specific policies and allocation of sites within the LDP.

Highly vulnerable development should not be permitted in zone C2. Any other development should only be made in zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1.

---

### **Desired Change:**

The following Paragraphs should be included after paragraph W2

Where flooding is a strategic issue that significantly constrains development options, local authorities should use the precautionary framework as part of considering sustainability options and, where necessary, set out the positive steps which have been taken to promote development in zones A and B.

The requirements of TAN15 will be a material factor in the formulation of specific policies and allocation of sites within the LDP.

Highly vulnerable development should not be permitted in zone C2. Any other development should only be made in zone C if it can be justified that a development/use has to be located there in accordance with section 6 and if the consequences of locating development are acceptable, in accordance with section 7 and appendix 1.

---

### **Response:**

In the Council's document "Statutory Consultee Involvement - Report of Consultation" the Council addressed the issues raised by the letter from the EA dated 12 July 2006 in respect of the inclusion of the additional paragraphs. The Council responded by saying:

"Whilst the comments received are not disagreed with this Scoping Report is not the place for inclusion as the requests in both paragraphs 1 and 2 are relevant to the LDP procedure and are best

addressed through that document and its preparation. The issues in paragraph 3, relating to water run off, are included within W2 however the inclusion of the above paragraph adds further weight and is recommended to be included within W2."

The Council are still of the view that the paragraphs that are sought for inclusion relate to planning policy, which is more appropriately addressed through the LDP. The SEA/SA is an assessment tool, not a vehicle for defining policy, and as such policy matters, upon which the LDP will need to make decisions, are more appropriately considered through the LDP process. The SEA/SA role is to assess the impact of the policy decisions in the LDP.

L

L

L

---

**Change to SEA/SA: No**

No change be made in respect of these comments.

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S3**

**Section:**

**Paragraph: All**

**Page:**

**Rep Type: Comment**

**Officer: David Lucas**

---

### **Representation Summary:**

Some previous comments have not been incorporated into the SEA/SA. Confirmation is required on how these issues will be addressed.

---

### **Representation:**

As mentioned above, we submitted our response to the draft scoping report last year. We are pleased to see that many of the comments we made have now been taken on board.

However, some comments have not and we believe that this may lead to omission of key issues or inappropriate consideration of others. For example, we made the point that the baseline information should include data on public transport use and inward/outward migration to places of work. Both of these issues are important in the context of Caerphilly, particularly in terms of its relationship with Cardiff as a place of work for many of its residents. We also believe that the baseline section could be developed in terms of material assets, particularly to include data on flood defences, water treatment capacity and the existing transport network.

Where data is difficult to collate or unavailable, the guidance allows you to identify data gaps and we would suggest that this ought to be done, where needed, to ensure measures can be put in place to address them before the next iteration of the plan. We also do not believe that the baseline data has covered the identification of trends and the likely evolution of the issue without the implementation of the plan. This is a requirement of the SEA Directive and we would have expected this information to be present here. We seek confirmation on how these points will be addressed.

---

### **Desired Change:**

Confirmation of how the issues raised in previous comments will be addressed.

---

### **Response:**

Note the support or the amendments made to the emerging Scoping Report as part of the Statutory Consultee Involvement process.

During the Statutory Consultee Involvement process of the SEA/SA CCW made a number of comments relating to omissions and inclusions within the Scoping Report. These comments were considered in the Report Of Consultation on the Statutory Consultee Involvement Process. The reasons why the Council have not made amendments in respect of some of the comments that were made are explained in the above report. It is not proposed to reproduce the responses in that document at this point, as that would result in duplication and result in an unnecessarily long report of Consultation at this point. The Council's position in respect of these comments has not changed.

Notwithstanding the above, details on both the levels of public transport usage within the County borough and the inward/outward migration to places of work were not provided in sufficient detail within the Scoping Report. Specific figures will be included within the plan for both public transport usage and migration, the issue of public transport use has been chosen as a specific

indicator within the SEA, under the section dealing with Climatic Factors. It is not intended to have a specific indicator tied to commuting to work.

With regard to the issues of infrastructure provision reference is made to this within the text of the Material Assets section. Generally capacity exists and it is not intended to identify individual facilities e.g. where flood defences are not in place then these areas are within the flood protection areas shown on figure 11 of the Scoping Report. Indicators relating to both sewage and highway improvements have been included.

The Scoping Report does include information as to the current position and the trend of the issues identified. The workshops and analysis associated with developing both the SEA/SA and preferred Strategy discussed the likely implications of four development scenarios including a continuation of the existing plan strategy. The three other options considered were an urban containment model, a sustainable growth strategy and a hybrid strategy.

---

**Change to SEA/SA: Yes**

Include details of commuting into and out of the County borough for work purposes into paragraph A1 of the air pollution section of the Scoping Report. If possible this should be done diagrammatically also.

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S6**

**Section: 1**

**Page: 007**

**Officer: David Lucas**

**Paragraph: 1.1**

**Rep Type: Objection**

---

### **Representation Summary:**

Replace 'in reasonable proximity' to 'Natura 2000 sites to 'that may be affected by activities within the County Borough'.

---

### **Representation:**

Replace 'in reasonable proximity' to 'Natura 2000 sites to 'that may be affected by activities within the County Borough'.

---

### **Desired Change:**

Replace 'in reasonable proximity' to 'Natura 2000 sites to 'that may be affected by activities within the County Borough'.

---

### **Response:**

The suggested rewording more accurately reflects the requirements of the Habitats Directive and the paragraph should be amended accordingly.

---

### **Change to SEA/SA: Yes**

Paragraph 1.1 of the Scoping Report be amended to read as follows:

"This document is the Scoping Report for the Strategic Environmental Assessment of the emerging Caerphilly Local Development Plan. The Strategic Environmental Assessment (SEA) will be integrated into the Sustainability Appraisal (SA) for the same development plan, and will be used to assess the effects of the policies and land allocations of the Local Development Plan. This document describes how this is to be undertaken. In addition, it is also necessary to undertake an Appropriate Assessment of the Plan as it affects Natura 2000 sites that may be affected by activities within the county borough."

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S1**

**Section: 4**

**Page: 016**

**Officer: David Lucas**

**Paragraph: 4.17 - 4.22**

**Rep Type: Comment**

---

### **Representation Summary:**

Welcome commitment to Approropriate Assessment, however feel that this should have already commenced given the publication of the LDP Strategy.

---

### **Representation:**

We welcome the commitment to complying with the Habitats Directive and the recent European Court of Justice ruling on applying Habitats Regulation Assessments (HRA) to land-use plans. The process set out in 4.17- 4.22 of document one sets out how your authority plan to deal with the need for HRA for both the Natura 2000 sites in Caerphilly as well as in neighbouring authorities. On account of the draft guidance, we feel that this process should have begun by now given that the preferred strategy has been chosen and proposed allocation maps are publicly available.

---

### **Desired Change:**

Immediate commencement of the Appropriate Assessment for the Caerphilly LDP.

---

### **Response:**

We note the support for our commitment to complying with the Habitats Directive.

However it is a little confusing why CCW have offered adverse comments on the way that Appropriate Assessment has been incorporated into the Scoping Report, when the approach was agreed in conjunction with them. In order to comply with the SEA Directive a formal Statutory Consultee Involvement process was undertaken between 14 June 2006 and 19 July 2006. This process formally sought the views and input of the Statutory Consultees (CCW, EA and Cadw) into the emerging Scoping Report. CCW, in their written response to the Council dated 18 July stated:

"The Local Development Plan area includes one Natura 2000 site and lies in proximity to a number of others. We, therefore, welcome the intention of Caerphilly CBC to carry out an appropriate assessment on the Local Development Plan. It should be clearly identified as a separate section within the SEA/SA scoping document and referenced from within the baseline characterisations. We recommend that Caerphilly CBC should contact CCW and the Welsh Assembly Government to discuss the context and methodology for this 'appropriate assessment' at the earliest possible opportunity and prior to the completion of the SEA. With this in mind, it is vital that allowance is made for the process within the delivery agreement/SEA timetable. CCW is currently producing draft guidance on the process and we will forward this to you as soon as it has been completed."

In response to the original comment the Council responded:

"It is agreed that an "Appropriate Assessment" of the LDP is required. It is also agreed that the Appropriate Assessment be included within the SEA/SA report. It is intended that the relevant Natura 2000 sites are referenced in this Scoping Report, along with a brief statement advising that an Appropriate Assessment is required. The assessment itself will be included in the Part 2 Environmental Report, in its own section."

A meeting with CCW was subsequently held between officers of CCW and the Council on August 4 2006. During this meeting the issue of Appropriate Assessment for the LDP was discussed at length. At that time the guidance on the Habitats Directive and development plans had not been issued. It was agreed by all parties that the best approach was to provide a background to the process in the Part 1 Scoping Report and the formal AA be undertaken, following the issuing of guidance, as part of the Part 2 assessment of the detailed plan. To this end agreed wording was included in the Scoping report (paragraphs 1.1, 4.17 -4.22 and B2).

In addition to this the stages and timing for the production of the development plan is set out in the WAG approved Caerphilly Local Development Plan Delivery Agreement. There were very tight deadlines to meet in producing the SEA/SA to accord with the consultation exercise for the LDP. As such it was a conscious decision to undertake the SEA/SA in a linear fashion, moving from one specific part to another, building on what had gone before. At the Statutory Consultee Involvement period the Scoping Report was reaching final version and was amended in light of comments from that consultation period. Following on from that the identification of Assessment Tests and the subsequent assessment for the preferred and alternative strategies were required to be complete in the period running till the end of the year. Delaying this work to amend the Scoping Report and incorporate a screening exercise (NB the council are already committed to undertaking the AA process) and the assessment of the strategy would have resulted in significant delays to the production of the pre-deposit plan. Conversely it was always the intention to review the Part 1 Documents at the end of the Pre-Deposit Consultation exercise, as it will be at every major stage in the process, which will be undertaken during the reconsideration and amendment of the Strategies prior to producing the Deposit Plan. This remains the council's stance as it represents the best available course of action to ensure compliance with SEA/SA, Habitats Directive, LDP procedural requirements and meeting the timescales laid out in the WAG approved Delivery Agreement.

---

**Change to SEA/SA: No**

No amendment be made in respect of this comment

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S7**

**Section: 4**

**Page: 014**

**Officer: David Lucas**

**Paragraph: 4.9**

**Rep Type: Objection**

---

### **Representation Summary:**

Replace 'Bristol Channel Marine SPA' with 'Severn Estuary SPA'.

---

### **Representation:**

Replace 'Bristol Channel Marine SPA' with 'Severn Estuary SPA'.

---

### **Desired Change:**

Replace 'Bristol Channel Marine SPA' with 'Severn Estuary SPA'.

---

### **Response:**

The correct name for the Natura 2000 should be used.

---

### **Change to SEA/SA: Yes**

Paragraph 4.9 of the Scoping Report be amended by the deletion of the term "Bristol Channel Marine SPA" and replace it with "Severn Estuary SPA"

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S18**

**Section: 6**

**Page: 051**

**Officer: David Lucas**

**Paragraph: G1b**

**Rep Type: Objection**

---

### **Representation Summary:**

Indicator b should include reference to greenfield land as well as brownfield.

---

### **Representation:**

Indicator b within the geology and geomorphology topic should include reference to greenfield land, as well as brownfield.

---

### **Desired Change:**

Indicator b should include reference to greenfield land as well as brownfield.

---

### **Response:**

The intention of this indicator is to consider the brownfield/greenfield split of development. In order to provide a reasonable indicator it is necessary to utilise only one land type (in this instance brownfield land). This is then considered against the total land developed, which is comprised of brownfield and greenfield land, to provide the target. As such greenfield development is implicit in the current indicator and target on brownfield development and consequently it is unnecessary to include indicators in respect of both brownfield and greenfield land.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S12

**Section:** 6

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Support

---

### **Representation Summary:**

Welcome th einclusion of targets and source data and the use of tabular form linking issues and objectives

---

### **Representation:**

We welcome the inclusion of targets and sources of data within the tables on objectives and indicators. In addition, the tabular format provides an obvious link between the issues and objectives.

---

### **Desired Change:**

None

---

### **Response:**

The support for the inclusion of targets and sources of data within the tables on objectives and indicators, and the the tabular format is noted.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S17

**Section:** 6

**Page:** 047

**Officer:** David Lucas

**Paragraph:** G3

**Rep Type:** Objection

---

### **Representation Summary:**

The reference to RIGS should be changed to geological SINC's.

---

### **Representation:**

G3 – The reference to RIGS should be changed to geological SINC's.

---

### **Desired Change:**

The reference to RIGS should be changed to geological SINC's.

---

### **Response:**

There is a subtle difference between Geological SINC's and RIG's. SINC's, by their title, are identified because of their nature conservation importance, not their geological structure (even though the geological structure may be the reason for the nature conservation interest). It is the nature conservation interest that is protected in a SINC designation. Conversely RIG's are identified to protect geological landforms specifically, irrespective of their nature conservation interest. Consequently it is quite possible for one site to be identified as a RIG and a SINC.

Given this the terms are not interchangeable. There are no identified RIG's in the County Borough to date. However in this instance the reference to RIG's is correct in that it is identifying the potential to identify areas of importance on geological grounds.

However it may be useful to reference the fact that both RIG's and geological SINC's can be identified.

---

### **Change to SEA/SA: Yes**

Paragraph G3 of the Scoping Report be amended to read as follows:

“Research undertaken by the Department of Earth Science from Cardiff University as part of the development of Landmap indicates that two areas of Caerphilly County Borough have geological interest of regional importance. These are the Caerphilly ridge in the south of the county borough and the Nelson to Tredomen area. The latter of these is an excellent example of cross valley glaciation whilst the former contains a range of linear rock types. There are also a range of examples of glacial activity throughout the county borough. There are five geological SSSIs within the county borough, and there is potential for a number of RIG's and Geological SINC's to be identified as a result of the ongoing work of Countryside Council for Wales. The quality and range of the county borough's geological heritage is an important factor in the character of the county boroughs landscape”

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Nigel Ajax-Lewis  
Wildlife Trust of South & West Wales

---

**Rep No:** 2215.S4

**Section:** 6

**Page:** 054

**Officer:** David Lucas

**Paragraph:** 1b

**Rep Type:** Objection

---

### **Representation Summary:**

Target 1b should be no loss of area of biological SSSI to development.

---

### **Representation:**

There should be no loss of area of biological SSSI to development (government target), Compare with Page 51 - Geology target.

---

### **Desired Change:**

Target 1b should be reworded to say "No loss of area of biological SSSI to development"

---

### **Response:**

Whilst the realisation of a situation of no loss of Biological SSSI would be a preferable scenario, it should also be noted that neither legislation, nor guidance, precludes development on SSSIs. Rather it allows for development, in certain circumstances, subject to compensatory provision.

In respect of Geological sites, it would be impossible to provide such compensatory provision, as it is the landform and its makeup that is the main feature of the designation. For biological sites however, whilst onerous, compensatory provision is more readily achievable. Consequently loss of geological designations is unlikely to be compensated for, whilst loss of biological designation will require compensatory provision.

In determining the target for both Geological and Biological designations, the above factors have been taken into account and the targets reflect this, hence the difference between the two. To amend the biological designation target to match the geological one would then be in conflict with the ability of the plan to influence the issue, as policies need to be reflective of planning guidance. As a result it is considered that the targets, as they stand, are realistic in consideration of government guidance.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this objection

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S19**

**Section: 6**

**Page: 051**

**Officer: David Lucas**

**Paragraph:**

**Rep Type: Objection**

---

### **Representation Summary:**

A target relating to the permeability of surfaces within new developments should be included.

---

### **Representation:**

In addition, in order to consider the issue of soil permeability and the implications for flood risk, a target relating to the permeability of surfaces within new developments should be included.

---

### **Desired Change:**

A target relating to the permeability of surfaces within new developments should be included.

---

### **Response:**

The Indicators and their associated targets have been derived through a lengthy process of involvement and consultation. In addition, it was decided to restrict the number of Issues to around 20 to ensure that the task of undertaking and implementing the SEA/SA was not excessively onerous and maintained a manageable number of Indicators. Consequently the Indicators that have been identified are those that are thought to be most relevant and those that provide the most effective monitoring of LDP effects.

It is acknowledged that the permeability of surfaces is an issue closely related to flood issues. However the Indicators are the basis from which the Assessment Tests have been, and will be, derived. Consequently the Indicators need to be related to the LDP and are suitable for assessing the effects of the LDP. The scope of development plans to influence the instance of permeable surfaces is limited to land allocations, as detailed site layout issues are not matters for the development plan. In addition the Council does not adopt SUDS, which can have a significant effect upon increasing permeability of development sites.

Given this, it is considered inappropriate to include an indicator on permeable surfaces as it is not specifically relevant to monitoring the effects of the LDP.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S15

**Section:** 6

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Water indicator 1d be reworded to better reflect the objective to improve water quantity.

---

### **Representation:**

Additionally, we suggest that the indicator 'increase in the number and volume of Environment Agency licensed abstractions' be reworded to better reflect the objective to improve the quantity of the water in the rivers

---

### **Desired Change:**

Indicator W1a be reworded to more accurately reflect the objective.

---

### **Response:**

As it is written it is agreed that the indicator can be misinterpreted to mean that an increase in abstractions is sought or desired. The target identifies that the aim is to keep abstractions within EA guidelines. The indicator should be reworded to reflect the target.

---

### **Change to SEA/SA: Yes**

Indicator W1d be amended to read as follows:

The number and volume of Environment Agency licensed abstractions

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S13

**Section:** 6

**Page:** 035

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Include an indicator referring to development within Landmap areas designated High or Outstanding.

---

### **Representation:**

We suggest that inclusion of an indicator referring to developments within LANDMAP high or outstanding areas would be advisable given that as an authority, all five layers are available to you. Similarly, the first indicator within the landscape topic should be revised to reflect any planning applications permitted within SLAs.

---

### **Desired Change:**

Include an indicator referring to development within Landmap areas designated High or Outstanding.

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S24

**Section:** 6

**Page:** 057

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Support

---

### **Representation Summary:**

Support inclusion of targets on CO2 emissions and use of renewable energies.

---

### **Representation:**

We commend the inclusion of targets on reducing the CO2 emissions from the county by 20% by 2010 and the inclusion of targets on the use of renewable energies.

---

### **Desired Change:**

---

### **Response:**

The support for the inclusion of Targets on CO2 emissions and use of renewable technologies is noted.

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S11**

**Section: 6**

**Page: 052**

**Officer: David Lucas**

**Paragraph: B2**

**Rep Type: Objection**

---

### **Representation Summary:**

The paragraph be reworded to correctly name 'Cardiff Beech Woods' and include the full reason for their identification as a SAC.

---

### **Representation:**

Within B2, reference should be made to the Cardiff Beech Woods, not the Castell Coch Beech Woods. Under 4.22, the Cardiff Beech Woods are recommended for SAC status on account of their Asperulo-Fagetum beech forests as well as the Tilio-acerion forests.

---

### **Desired Change:**

That the paragraph be reworded to refer to "Cardiff beech Woods" and to reference that they are designated as a SAC on account of both Asperulo-Fagetum and Tilio-Acerion forests.

---

### **Response:**

Within B2, reference should be made to the Cardiff Beech Woods, not the Castell Coch Beech Woods. Under 4.22, the Cardiff Beech Woods are recommended for SAC status on account of their Asperulo-Fagetum beech forests as well as the Tilio-acerion forests.

It is agreed that the correct names and information should be used in respect of the SACs. Consequently the name of the SAC in Paragraph B2 should be changed and the correct information should be included in Paragraph 4.22.

---

### **Change to SEA/SA: Yes**

Paragraph B2 be amended by the deletion of the term "Castell Coch Beech Woods" and its replacement by "Cardiff Beech Woods": In addition paragraph 4.22 be reworded as follows:

". . . The second site is The Cardiff Beech Woods to the south west of the County borough, in the Cardiff and Rhondda Cynon Taff areas. This site is important because they are of a unique gene pool of Tilio - Acerion and Asperulo Fagetum that are at the western limit of their range. . . ."

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S10**

**Section: 6**

**Page: 044**

**Officer: David Lucas**

**Paragraph: W6**

**Rep Type: Objection**

---

### **Representation Summary:**

The opening sentence be reworded

---

### **Representation:**

The statement within W6 that reads 'within the county borough five sites of Special Scientific Interest contained in 'wet habitats' should be reworded to 'there are ten SSSIs in the county borough, three of which contain water dependent habitats'.

---

### **Desired Change:**

The opening sentence be reworded to state 'there are ten SSSIs in the county borough, three of which contain water dependent habitats'.

---

### **Response:**

The statement in the paragraph reflects that situation that there are 3 SSSIs whose habitat is directly water dependant (Lower House Stream Section Rhymney, Nelson Bog and Wern Ddu Clay Pits) whilst there are 2 SSSIs whose habitat is indirectly water dependant as they are wet grasslands (Aberbargoed Grasslands, Penllwyn Grasslands Blackwood). Given that the paragraph relates to water based ecological sites, it is felt that the reference to all five should be retained, although better wording would make the situation clearer.

---

### **Change to SEA/SA: Yes**

Paragraph W6 of the Scoping Report be amended to read as follows:

"Within the county borough five Sites of Special Scientific Interest are dependant upon water, three directly and two indirectly. Further to this the rivers, their tributaries and supporting reservoirs are valuable for amphibians, invertebrates, butterflies, birds and mammals, several of which are UKBAP priority species. The environmental interests of the Severn Estuary are protected by the EU Habitats Directive 1994, the EC Birds Directive 1979 and the Wildlife and Countryside Act 1981 and all three rivers in the County borough flow into this. There have been several major incidences of industrial pollution of the rivers within Caerphilly County Borough over recent years.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S9

**Section:** 6

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

Little information on access, recreation, use of Public Rights of Way and green spaces and their benefits.

---

### **Representation:**

There is also little information on access and recreation including consideration of the use of public rights of way and green spaces. We believe this has resulted in an under-estimation of the potential for the LDP to improve the use of such spaces and the benefits for human health.

---

### **Desired Change:**

The inclusion of information on access and recreation.

---

### **Response:**

There are an infinite number of factors and issues that contribute to the current state of the environment. However to consider each and every one of them would result in an extremely lengthy and largely irrelevant background document that would not be suitable as a basis for the consideration of relevant issue that need to be considered through the SEA/SA. As a result the scoping Report focusses on the factors and issues that currently pose environmental problems or are directly impacted by the LDP. Whilst it is not argued that the use of public rights of way and open spaces is important in terms of impacts upon human health, it is felt that, as the issue of the relationship between use of open space and public open space with human health benefits is referenced in Paragraph P17, including information in respect of access and recreation, particularly in respect of green spaces and public rights of way, would not provide any useful purpose in setting the context for the assessment of the LDP.

The LDP will consider the extent of public rights of way and green spaces within the county borough as part of its formulation. It is likely that this information would be included in a background document related to recreation. Consequently it is considered inappropriate to include references in the Scoping Report.

However, the beneficial effects of use of these facilities on human health is important and has been referenced in Paragraph P17.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S8**

**Section: 6**

**Page: 037**

**Officer: David Lucas**

**Paragraph: Figure 9**

**Rep Type: Objection**

---

### **Representation Summary:**

The ancient woodland identified in Figure 9 should be split into ecologically ancient woodland and plantations on ancient woodland sites.

---

### **Representation:**

In addition to the comments above, we believe it would be helpful to separate out the data on ancient woodland in figure 9 into those sites which are ecologically ancient woodland, and which are plantations on ancient woodland sites. This information would be available from the Inventory of Ancient Woodlands and the Forestry omission.

---

### **Desired Change:**

The data on ancient woodland in figure 9 should be split into those sites which are ecologically ancient woodland, and which are plantations on ancient woodland sites.

---

### **Response:**

Whilst there may be no problem with the availability of information in order to split the ancient woodland into ecological and other woodland, it is unclear what useful purpose splitting this information has. In separating out the ancient woodland into two parts it has the tendency to give greater weight to one set of woodland over the other, which would be counter-productive. In addition the Scoping Report has been written so that only information that is relevant and pertinent to the LDP has been included. Information relating to other aspects of the environment have been omitted from the Scoping Report as it is not relevant to the LDP. This has been done consciously to try to make the Scoping Report succinct, relevant and as easy as possible to read and understand. The inclusion of all available data, irrespective of whether it is relevant to the LDP, would make the document unwieldy, very lengthy and over-complicated.

Without clear reasoning for splitting the ancient woodland into separate sets it is considered that doing so could be divisive, and would set a precedent for including unnecessary information to the detriment of the Scoping Report.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

---

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S20

**Section:** 6

**Page:** 051

**Officer:** David Lucas

**Paragraph:** G1e

**Rep Type:** Objection

---

### **Representation Summary:**

The target should include the need to maintain or improve accessibility to geological SSSIs.

---

### **Representation:**

The target for indicator e should include the need to maintain or improve accessibility to geological SSSIs as well as no loss of land or setting.

---

### **Desired Change:**

The target should include the need to maintain or improve accessibility to geological SSSIs.

---

### **Response:**

Improving accessibility to RIGs and geological SSSIs can have significant adverse impacts upon the RIG or SSSI. Large scale access by the public can have, and is having in certain locations, serious detrimental impacts upon areas of geological importance. Allied with improving permitted accessibility, comes the potential for increased and unwanted access by damaging modes such as off road vehicles, motorbikes and horses and also the increased liability the council or landowner has to bear. Consequently it is not a aim of the Council to improve access to RIGs or geological SSSIs.

Given that this is not a council aim, the LDP will not address this issue and therefore an indicator would not be appropriate as it would not be addressing the effects of the LDP, which is the purpose of the SEA/SA.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S3

**Section:** 6

**Page:** 040

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Support

---

### **Representation Summary:**

The objectives and indicators appear fairly complete.

---

### **Representation:**

This plan contains several useful objectives and indicators relating to the historic landscape and historic environment generally. This includes seeking advice from Cadw and the Glamorgan and Gwent Archaeological Trust and would appear fairly complete.

---

### **Desired Change:**

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S21

**Section:** 6

**Page:** 054

**Officer:** David Lucas

**Paragraph:** B1b

**Rep Type:** Objection

---

### **Representation Summary:**

Include an indicator on the percentage of site features in favourable conservation status.

---

### **Representation:**

The indicator on the 'area of biological SSSI lost to development' should also include an indicator on the percentage of site features in favourable conservation status. When considering impacts, the effect on designated sites from activities on adjacent land should also be assessed and monitored in addition to direct impacts.

---

### **Desired Change:**

Include an indicator on the percentage of site features in favourable conservation status.

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S22**

**Section: 6**

**Page: 054**

**Officer: David Lucas**

**Paragraph: B1c**

**Rep Type: Objection**

---

### **Representation Summary:**

Target should either be no net loss of sites or as specificity % loss that is acceptable?

---

### **Representation:**

We would question the use of the target for 1c and its measurability. Aim should be that no net loss of sites or specify % loss that is acceptable?

---

### **Desired Change:**

Target should amended to be either no net loss of sites or specificity % loss that is acceptable?

---

### **Response:**

The issue of monitoring LNRs and SINC is complicated by the fact that the majority of land identified as LNR or SINC is not under the ownership of the council or other government bodies. As such LNRs and SINC can be lost by means that fall outside the remit of both the council and the development plan to control. So providing an indicator relating to no loss, or even a percentage loss, is placing an onus on the Development Plan to realise something that it cannot control.

Relating the indicator and target specifically to land lost through development, i.e. matters that the can be influenced by the LDP, will mean that the indicator and target are better related to considering the effects of the LDP, which is the purpose of the SAEA/SA process.

The purpose in identifying LNRs and SINC is for their protection. It is only reasonable, therefore, that the target should seek no loss of LNR or SINC. However, guidance advises that LNRs and SINC are not sacrosanct and development can be allowed on them if justified. Guidance also advises that where such land is lost compensatory provision should be provided as part of the development. Consequently the target should seek no net loss of LNR or SINC to accord with national guidance.

---

### **Change to SEA/SA: Yes**

Target B1c should be amended to read as follows:

“No net loss of area of land identified as LNR or SINC as a result of development”

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S23**

**Section: 6**

**Page: 040**

**Officer: David Lucas**

**Paragraph: CH1e**

**Rep Type: Objection**

---

### **Representation Summary:**

Should indicator be relocated in Biodiversity section.

---

### **Representation:**

While we support the inclusion of a target to increase land in environmental management through section 106 agreements, we question whether this target should sit within the cultural heritage topic, or whether it is related more directly to biodiversity.

---

### **Desired Change:**

The indicator be relocated in Biodiversity section

---

### **Response:**

The support for the indicator is noted.

In this instance the term “environmental” means both urban and rural environments. As such this indicator could sit in either Biodiversity or, as it is, in Cultural Heritage and Landscape. As such the indicator is not incorrectly located and there does not seem to be any overriding reason for it to be moved.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector: Mr Richard Jones**  
**Countryside Council for Wales**

---

**Rep No: 1056.S25**

**Section: 6**

**Page: 057**

**Officer: David Lucas**

**Paragraph:**

**Rep Type: Objection**

---

### **Representation Summary:**

Include indicators and targets set for building standards in new developments.

---

### **Representation:**

We suggest that indicators and targets could be set for building standards in new development, such as BREEAM excellent. This standard incorporates the idea of sustainable design including accessibility to public transport. There are other climate change mitigation and adaptation actions detailed in the recent WAG Consultation on their Climate Change Action Plan.

---

### **Desired Change:**

Indicators and targets be included for building standards in new development.

---

### **Response:**

Whilst it is agreed that the issue of building standards is integral to meeting the national targets in respect of climate change, there are fundamental problems in including indicators and targets on building standards of new developments. Buildings are required to be built to a specific standard by building regulations, which are enforceable. However identifying any standard over and above the building regulations standard is unenforceable and, as a result, nullifies any policy that may be included in a development plan seeking higher building standards.

In addition there is more than one potential measure that buildings can be assessed against. BREEAM and ECOHOMES are the most commonly used and although they essentially seek to measure the ecological sensitivity of a building, they do not apply the same assessment criteria and as such are not compatible.

In addition it is questionable whether development plans can have any effect upon the building standards of new development. The remit of development plans is to consider the principle of development for sites it identifies and allocates and to provide policies against which development proposals can be considered. As outlined above, as there is already a legal standard to which buildings should be designed, there is little basis to support any development plan policy that seeks to attain a higher standard. As such any indicator or target in respect of this issue will only be monitoring the willingness of developers to provide higher standard houses, rather than the effect of the development plan itself.

Given the issues surrounding this issue it is currently considered inappropriate to include an indicator on higher building standards for new development. If, during the LDP process, legislative changes are made that make the use of policies seeking higher standards more acceptable and binding, then an indicator and target will be included in the SEA/SA.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S14

**Section:** 6

**Page:** 046

**Officer:** David Lucas

**Paragraph:** 1

**Rep Type:** Objection

---

### **Representation Summary:**

There is a typing error in the objective.

---

### **Representation:**

Within the water topic, we suggest that there may be a typing error within the first objective

---

### **Desired Change:**

Deletion of the typing error.

---

### **Response:**

There is a drafting error in the Objective that should be removed.

---

### **Change to SEA/SA: Yes**

The first Water Objective be reworded to read as follows:

"To protect aquifers and improve the quality and quantity of the water in our rivers and to reduce water consumption "

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S77

**Section:** 6

**Page:** 053

**Officer:** David Lucas

**Paragraph:** B4

**Rep Type:** Comment

---

### **Representation Summary:**

What is the impact of the Grey Squirrel upon species other than Red Squirrels, whilst ring barking of splings is a problem.

---

### **Representation:**

Page 53

Paragraph B4

Final sentence – CPRW wonders what the impact of the Grey Squirrel is upon species other than Red Squirrels (extinct in SE Wales). The destruction of saplings by ‘ring barking’ is, however, understood to be a problem.

---

### **Desired Change:**

---

### **Response:**

Amongst others, the Grey Squirrels impact upon nesting birds and the effect on trees has wider effects upon the habitat and its species.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S1

**Section:** 6

**Page:** 035

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Support

---

### **Representation Summary:**

The Cultural heritage Chapter seems complete.

---

### **Representation:**

Although a little verbose, the Cultural Heritage baseline chapter seems complete.

---

### **Desired Change:**

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S69

**Section:** 6

**Page:** 046

**Officer:** David Lucas

**Paragraph:** 2

**Rep Type:** Objection

---

### **Representation Summary:**

Indicators and targets F and I should be combined.

---

### **Representation:**

Page 46

Water Table

2 Flood Issue

Indicators f. and i. - CPRW is not sure that it is necessary to include both indicators.  
They could be combined as:

‘Percentage of development in flood risk areas C1 and C2, as defined by TAN 15, approved contrary to Environment Agency advice without mitigation being undertaken’.

Targets would also need to be combined.

---

### **Desired Change:**

Indicators and targets F and I should be combined.

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S70

**Section:** 6

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### Representation Summary:

---

**Representation:**  
NOT A COMMENT

---

**Desired Change:**

---

**Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S71

**Section:** 6

**Page:** 048

**Officer:** David Lucas

**Paragraph:** G5

**Rep Type:** Comment

---

### **Representation Summary:**

Lower grade agricultural land may usefully contribute to Biodiversity issue 4.

---

### **Representation:**

Page 48

Paragraph G5

4th sentence – a cautious approach should be taken to the matter of improvement to lower grade agricultural land, some of which may usefully contribute to Biodiversity ISSUE 4. It is noted that ISSUE 5. is also of relevance (page 53).

---

### **Desired Change:**

---

#### **Response:**

It is acknowledged that lower classes of agricultural land can be of ecological importance and as such this should be included within the text.

---

#### **Change to SEA/SA: Yes**

Paragraph G5 be amended to read as follows:

"A typical cross section through the Authority would show the plateau tops, ridges and steep valley sides covered by podzolic soils of varying types over sandstone with the lower, flatter land covered by poorly drained clay soils of glacial drift origin. Figures 12 and 13, below, broadly illustrates soil cover within the Rhymney Valley and the Islwyn and Ebbw Valleys. With the exception of small land areas within the south of the county borough the MAFF agricultural land classification are lower grades 3,4 and 5, generally the higher the altitude of land the lower the classification. All the above upland soil types are capable of agricultural improvement, although this should be tempered against the potential for the land to be of ecological importance. The function of soils is also a pertinent issue, particularly in respect of their permeability and the implication in flood risk areas and areas suffering from poor drainage."

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S72

**Section:** 6

**Page:** 048

**Officer:** David Lucas

**Paragraph:** G8

**Rep Type:** Comment

---

### **Representation Summary:**

Does the Council also actively encourage private sector developers to re-use building materials?

---

### **Representation:**

Page 48

Paragraph G8

3rd sentence - does the Council also actively encourage private sector developers to re-use building materials?

---

### **Desired Change:**

---

### **Response:**

The Council seeks to encourage all forms of developers to use sustainable materials, including recycled materials. However the Council cannot require that a developer use such materials unless the development is on council land or is a council development.

---

### **Change to SEA/SA: Yes**

No amendment be made in respect of this comment

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S73

**Section:** 6

**Page:** 050

**Officer:** David Lucas

**Paragraph:** Fig 14

**Rep Type:** Objection

---

### **Representation Summary:**

It is assumed that the Vice County Boundary relates to the fact that Gwent Wildlife Trust covers only part of the county borough area.

---

### **Representation:**

Page 50

Figure 14

In the absence of information, it is assumed that the Vice County Boundary relates to the fact that Gwent Wildlife Trust covers only part of the county borough area.

---

### **Desired Change:**

Clarification is required on what the Vice County Borough Boundary is.

---

### **Response:**

The Representor is correct in identifying that the Vice County Boundary identified on the map represents the boundary delineation of the Gwent Wildlife Trust and Glamorgan Wildlife Trust areas. This should be clarified.

---

### **Change to SEA/SA: Yes**

The key to Figure 14 be amended by the removal of the term "Vice County Boundary" and its replacement with "Wildlife Trust Area Boundary".

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S74

**Section:** 6

**Page:** 051

**Officer:** David Lucas

**Paragraph:** 1

**Rep Type:** Objection

---

### **Representation Summary:**

Indicators C and D should be combined and clarified.

---

### **Representation:**

Page 51

Geology and Geomorphology Table

1 Soils Issue

Indicator d. - CPRW is not sure why the terms potential and potentially are included in this indicator and in the corresponding Target. They make an indeterminate statement. Additionally, Targets c. and d. could suitably be combined, to read:

‘Reduce the amount of derelict land and contaminated sites throughout the plan period’.

It is suggested that Indicator c. be deleted.

---

### **Desired Change:**

Indicators C and D should be combined to read as follows:

‘Reduce the amount of derelict land and contaminated sites throughout the plan period’.

---

### **Response:**

Contaminated land and derelict are two separate issues, both of which are of relevance and importance to the county borough and the LDP. As two separate issues they are appropriately dealt with separately, with separate indicators and targets. It is acknowledged that a site may be both derelict and contaminated. However in such instances both sets of indicators and targets will apply to the site. There are also many instances of land that is only either derelict or contaminated, where only the applicable set of indicators and targets will apply.

The council are satisfied that the issues of contaminated land and derelict land are appropriately addressed in the Scoping Report.

It is accepted that the terms potential and potentially are used inappropriately in the indicator and target respectively. In these instances the adverb "potentially" is the appropriate term, and the indicator should be amended accordingly.

---

### **Change to SEA/SA: Yes**

Geology and Geomorphology Indicator 1d be amended to read as follows:

"Number of potentially contaminated sites brought into use via remediation and redevelopment"

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S67

**Section:** 6

**Page:** 046

**Officer:** David Lucas

**Paragraph:** 2

**Rep Type:** Objection

---

### **Representation Summary:**

This target and indicator are unlikely to change and should be deleted.

---

### **Representation:**

Page 46

Water Table

Indicator d. - CPRW does not consider this to be a suitable indicator in that licensed abstractions are unlikely to change sufficiently to provide a meaningful targeted measurement. Moreover, it does not correspond to the Target, as drafted, in that increase and maintenance are opposing concepts. The indicator is arguably unnecessary, and should be deleted, together with its associated Target.

---

### **Desired Change:**

Deletion of the indicator and target.

---

### **Response:**

Environment Agency (Wales) requested the inclusion of an indicator in respect of abstractions and it is considered appropriate that one be retained. Indicator (d) is poorly phrased as it implies that abstractions will rise. It is the number and amount of abstractions that should form the basis of the indicator, with the target seeking to maintain them within EA guidelines.

---

### **Change to SEA/SA: Yes**

Water Indicator 1d be amended to read as follows:

"The number and volume of Environment Agency licensed abstractions"

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S76

**Section:** 6

**Page:** 053

**Officer:** David Lucas

**Paragraph:** B4

**Rep Type:** Comment

---

### **Representation Summary:**

It would appear that over exploitation as a reason for biodiversity loss relates to the impact of too many visitors to habitats.

---

### **Representation:**

Page 53

Paragraph B4

1st sentence – taking account of ISSUE 10 on page 53, it would appear that over exploitation as a reason for biodiversity loss relates to the impact of too many visitors to habitats.

---

### **Desired Change:**

---

### **Response:**

Over-exploitation can take many forms dependant upon the type of habitats in question, e.g. over fishing in aquatic environments, and does not solely relate to numbers of visitors. The purpose of the Scoping Report, in setting out the Baseline Characterisation, is to set out the principle issues facing the county borough and the LDP, rather than identify all potential issues and all of their sources. As such it is appropriate to use the term "over exploitation" as it relates to the broad issues and not specific causes.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S66

**Section:** 6

**Page:** 046

**Officer:** David Lucas

**Paragraph:** 1

**Rep Type:** Objection

---

### **Representation Summary:**

Clarification is needed on whether water consumption is to be reduced by 60% during the LDP period?

---

### **Representation:**

Page 46

Water Table

1 Issue Objective – is this intended to convey that water consumption is to be reduced by 60% during the LDP period?

---

### **Desired Change:**

The Issue/objective should be clarified to identify if water consumption is to be reduced by 60% during the plan period.

---

### **Response:**

There is a drafting error in the Objective that should be removed.

---

### **Change to SEA/SA: Yes**

The first Water Objective be reworded to read as follows:

"To protect aquifers and improve the quality and quantity of the water in our rivers and to reduce water consumption "

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S78

**Section:** 6

**Page:** 054

**Officer:** David Lucas

**Paragraph:** Issue 4

**Rep Type:** Support

---

### **Representation Summary:**

The retention of and improvement to a mosaic of habitats and wildlife corridors is applauded.

---

### **Representation:**

Page 53

ISSUE 4.

The retention of and improvement to a mosaic of habitats and wildlife corridors is applauded. This is in line with proposals in course of development in connection with the Wales Spatial Plan South East Wales City Region scenario.

---

### **Desired Change:**

---

### **Response:**

The support for the retention of and improvement to a mosaic of habitats and wildlife corridors is noted.

---

**Change to SEA/SA: No**

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S79

**Section:** 6

**Page:** 054

**Officer:** David Lucas

**Paragraph:** Ind B

**Rep Type:** Comment

---

### **Representation Summary:**

The No net loss takes into account compensatory and new provision as an offset against any unavoidable loss.

---

### **Representation:**

Page 54

Biodiversity Table

Indicator b. Target

The No net loss presumably also takes into account 'exchange' habitat in place of unavoidable losses due to development, and of newly created habitats that accompany development or are pursued by voluntary and/or community endeavour.

---

### **Desired Change:**

---

### **Response:**

The term "no net loss" does take into account compensatory or other provision that may be made where an application is approved on, or has effect upon, a SSSI. This is in line with Government guidance.

---

### **Change to SEA/SA: No**

No amendment be made in respect fo this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S80

**Section:** 6

**Page:** 056

**Officer:** David Lucas

**Paragraph:** Iss 4

**Rep Type:** Comment

---

### **Representation Summary:**

With summers becoming hotter, cooling efficiency will become as important as efficient heating. Orientation will have a bearing on this.

---

### **Representation:**

Page 56

ISSUE 4.

With summers becoming hotter, cooling efficiency will become as important as efficient heating. Orientation of buildings and tree planting will have a bearing on this.

---

### **Desired Change:**

---

### **Response:**

It is agreed that if summers do become hotter as a result of climate change then passive cooling will become increasingly important in respect of the design and efficiency of buildings. This should be reflected in the text of the baseline characterisation.

---

### **Change to SEA/SA: Yes**

Paragraph CF2 be amended to read as follows:

"Whilst the impact of climatic change is likely to be global it is considered that its causes are mainly generated by western industrialised countries (details of pollutants contributing to climatic change are outlined in the air pollution section). As such the environmental adage used during the 1980s, of 'think global but act local' holds true as it is the industrialised countries that are best placed to help mitigate climatic change. The National Assembly for Wales advocates the precautionary principle. Climate change will have implications for the design of new buildings, especially in respect of energy efficiency, insulation, solar orientation and passive cooling. As a result new building design should adopt green technologies as far as is practical."

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S81

**Section:** 6

**Page:** 057

**Officer:** David Lucas

**Paragraph:** 1

**Rep Type:** Objection

---

### Representation Summary:

---

#### Representation:

Page 57

Climate Factors Table

1 Climate Change Issue – Indicator a.

It is difficult to understand why the Target requires a larger CO2 reduction by 2010 than by 2021.

---

#### Desired Change:

---

#### Response:

The Representor has misinterpreted the target for Indicator 1a. The target seeks to reduce carbon dioxide emissions compared against the 1999 emissions levels, i.e. by 2010 carbon dioxide levels should be only 80% of the 1999 level, whilst in 2021 they should be only 69% of the 1999 level. These targets are progressive as they seek greater reduction in 2021 than in 2010.

---

#### Change to SEA/SA: No

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S82

**Section:** 6

**Page:** 057

**Officer:** David Lucas

**Paragraph:** 2

**Rep Type:** Support

---

### **Representation Summary:**

The target is innovative and it is hoped it can be realised as a result of the planned increases in public transport provision

---

### **Representation:**

Page 57

Climate Factors table

2 Transport Indicator d.

The corresponding Target is an innovative one, which CPRW very much hopes can be realised as a result of the planned increases in public transport provision.

---

### **Desired Change:**

---

### **Response:**

The support for the target for indicator 1d is noted.

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S83

**Section:** 6

**Page:** 057

**Officer:** David Lucas

**Paragraph:** 2

**Rep Type:** Objection

---

### **Representation Summary:**

Clarification is needed on whether the indicator relates to all modes of transport.

---

### **Representation:**

Page 57

Climate Factors table

2. Transport Issue – Indicator f.

It is not clear as to whether Target average journey times decrease covers all modes; car/motorcycle; train; bus; bicycle; on foot.

---

### **Desired Change:**

The Indicator should be reworded to clarify what modes of transport it relates to.

---

### **Response:**

It is acknowledged that the target for indicator 2f is not specific in relations to what forms of travel it applies. The target is seeking to address the issue of reducing the length and time of road trips (predominantly car borne) in accordance with government guidance. The target should be amended to reflect this.

---

### **Change to SEA/SA: Yes**

The target for Indicator 2f bwe reworded to read as follows:

"Realise decrease in average car journey times from 2006 level by the end of the plan period. Road traffic reduction in accordance with government 10 year plan"

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S84

**Section:** 6

**Page:** 058

**Officer:** David Lucas

**Paragraph:** MA5

**Rep Type:** Support

---

### **Representation Summary:**

Good to see the county borough is well served by the footpath network.

---

### **Representation:**

Page 58

### **MATERIAL ASSETS**

Paragraph MA5

1st sentence – it is good to see that the county borough is well served...by the footpath network (see page 57 table under the 2 Transport issue, Indicator h. and its Target, which refers to public footpaths as being passable).

---

### **Desired Change:**

---

### **Response:**

The support for the statement in respect of the county borough being well served by public rights of way is noted.

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S75

**Section:** 6

**Page:** 051

**Officer:** David Lucas

**Paragraph:** 3

**Rep Type:** Objection

---

### **Representation Summary:**

Clarification required on whether Indicator K covers re-use of construction/demolition waste by public and private developers.

---

### **Representation:**

Page 51

Geology and Geomorphology Map

3 Waste

Can it be assumed that Indicator k. covers re-use of construction and demolition waste by public and private sector developers (paragraph G8 on page 48 refers to County Borough Council practice)?

---

### **Desired Change:**

Indicator K should be reworded to clarify whether it covers re-use of construction/demolition waste by public and private developers.

---

### **Response:**

**Change to SEA/SA:** No

---

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S57

**Section:** 6

**Page:** 031

**Officer:** David Lucas

**Paragraph:** 10

**Rep Type:** Objection

---

### **Representation Summary:**

The target needs to be clarified so that it states its proper intention.

---

### **Representation:**

Page 31

Population and Human Health Table

10 Population

An improved 2nd Target associated with Indicator (y) would be:

‘Increase percentage of working age people within the population to the Welsh average...’  
(by encouraging in-migration and minimising out-migration). As worded, the text is too suggestive of the desire to remove elderly people from the county borough by, at best, obliging them to seek care homes in other LA areas.

---

### **Desired Change:**

The target should be reworded to say

"Increase percentage of working age people within the population to the Welsh average"

---

### **Response:**

This should be reworded in case it gives the wrong impression. The proposed amendment put forward does not address the issue which relates only to those beyond working age whilst the proposed amendment would also include those too young to work.

---

### **Change to SEA/SA: Yes**

The Second target for Indicator Y(Population and Human Health) be amended to read as follows:

‘Achieve a proportion of elderly residents more in line with the Welsh average level by the end of the plan period’

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Kevern  
CADW

---

**Rep No:** 1065.S2

**Section:** 6

**Page:** 039

**Officer:** David Lucas

**Paragraph:** Issue 3

**Rep Type:** Objection

---

### **Representation Summary:**

Reference should be made to registered historic landscapes

---

### **Representation:**

Point 3 identifies threats to landscape and structures of cultural significance but no specific reference has been made to the registered historic landscapes.

---

### **Desired Change:**

Inclusion of a reference to registered historic landscapes

---

### **Response:**

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Nigel Ajax-Lewis  
Wildlife Trust of South & West Wales

---

**Rep No:** 2215.S1

**Section:** 6

**Page:** 054

**Officer:** David Lucas

**Paragraph:** 1c

**Rep Type:** Objection

---

### **Representation Summary:**

Objection to the Target for Indicator 1C/Biodiversity to no net loss of SINC

---

### **Representation:**

There should be no net loss to areas of sincs where they contribute to Caerphilly's share of the Welsh biodiversity targets (see attached sheet).

---

### **Desired Change:**

Change the target for Indicator 1c/Biodiversity to no net loss of SINC BAP habitat.

---

### **Response:**

The proposal would require the inclusion of a new indicator and target if both non BAP SINC's and LNR's were also to continue to be included. This is of course possible however given that both SINC's and LNR's are included as indicators the additional value that a further indicator would give is questioned. The issue would seem to be one of ensuring there is no net loss of BAP SINC's and this is better addressed through policy and supporting text. Under paragraph 25 of the Explanatory Notes section in the Preferred Strategy Document it explains that both SINC's and LNR's should be retained and where this is not possible 'measures to mitigate for the loss of habitat and/or species will always be required.'

---

### **Change to SEA/SA: No**

No change be made to the Scoping Report in respect of this objection.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S51

**Section:** 6

**Page:** 024

**Officer:** David Lucas

**Paragraph:** Figure 4

**Rep Type:** Objection

---

### **Representation Summary:**

The Figure is impossible to interpret unless that second emboldened heading is taken to read: Total Economically Inactive

---

### **Representation:**

Page 24

Figure 4

The Figure is impossible to interpret unless that second emboldened heading is taken to read:  
Total Economically Inactive

---

### **Desired Change:**

The second emboldened heading be reworded as follows:

"Total Economically Inactive"

---

### **Response:**

This is a typographical error and should read 'Economically Inactive'.

---

### **Change to SEA/SA: Yes**

The second emboldened heading be reworded as follows:

"Total Economically Inactive"

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S52

**Section:** 6

**Page:** 025

**Officer:** David Lucas

**Paragraph:** P13

**Rep Type:** Objection

---

### **Representation Summary:**

There is a conflict in the 1st and 3rd paragraphs on whether affordability is an issue in the north of the county borough.

---

### **Representation:**

Page 25

Paragraph P13

In order to reconcile two apparently contradictory statements in the 1st and 3rd sentences, it has to be assumed that the affordability issue has changed since 2002. While the 1st sentence says: there was an over supply of affordable housing in the north, the 3rd sentence claims that: Affordability is an issue throughout the county borough. Is CPRW's reasoning as to 'change' correct?

---

### **Desired Change:**

Clarification is required to clear up the apparently contradictory statements.

---

### **Response:**

Whilst the 2002 report identified that there was an excess of affordable units in the north of the County Borough, it also identified that the units did not meet the needs of those seeking affordable housing, due to a number of factors. Whilst there is a surplus of units, there is also a need for differing types and as such there is still a need, although it is acknowledged that the issue of affordability is higher more pronounced in the south of the county borough. Consequently the statements made in the paragraph are correct and compatible.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S53

**Section:** 6

**Page:** 029

**Officer:** David Lucas

**Paragraph:** 4 & 5

**Rep Type:** Objection

---

### **Representation Summary:**

Is it desirable to have targets that exceed the welsh national average.

---

### **Representation:**

Page 29

Population and Human Health Table

4 Education and 5 Equalities

With regard to Targets (g), (h), (i) and (j), CPRW wonders how realistic it is to attempt to reach a target of exceeding the Welsh Average, desirable though it is as a longer term objective. Figures in line with the Welsh Average should be aimed for during the life of the LDP

---

### **Desired Change:**

---

### **Response:**

It is the intention fo the Scoping Report to specifically highlight the issues relating to Targets g,h,i and j, by identifying the need to achieve averages in excess of the Welsh Average. In identifying a specific target for each indicator, careful consideration was given to what could realistically be sought and where heightened targets could realise significant benefits resulting from LDP policy influenced by them. Identifying a high target for these issues will mean that they are reflected in the LDP.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S54

**Section:** 6

**Page:** 029

**Officer:** David Lucas

**Paragraph:** 5

**Rep Type:** Objection

---

### **Representation Summary:**

Clarification is needed on whether it is the academic achievements of Ethnic Minority school children that is the focus of the Indicator.

---

### **Representation:**

On the assumption that it is the academic achievements of Ethnic Minority school children that is the focus of the Indicator, Target (j) the text is incomplete.

---

### **Desired Change:**

Clarification is needed on whether it is the academic achievements of Ethnic Minority school children that is the focus of the Indicator.

---

### **Response:**

The indicator does relate to the academic achievements of ethnic minority school children. The indicator need to be reworded to reflect this.

---

### **Change to SEA/SA: Yes**

Population and Human health Indicator (j) be reworded to read as follows:

"Percentage of black ethnic minority school children aged 15/16 with 5 or more Grades a-c passes at GCSE"

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S68

**Section:** 6

**Page:** 046

**Officer:** David Lucas

**Paragraph:** 2

**Rep Type:** Objection

---

### **Representation Summary:**

Indicator is unsuitable as it is subject to imponderables such as weather patterns and should be deleted.

---

### **Representation:**

Page 46

Water Table

2 Flood Issue

Indicators g. and h. – these depend too much upon the imponderables of weather patterns to be very reliable, so they only may provide a starting point for Targets.

---

### **Desired Change:**

The deletion of the Indicator.

---

### **Response:**

Environment Agency (Wales) and CCW have both requested the inclusion of indicators in respect of flooding and flood risk in response to TAN 15 and the need to address climate change. It is acknowledged that there is significant influence within these indicators that lies outside the remit of the LDP and as such the indicators can only realistically represent part of the picture in respect of the issue. However the effect the LDP Policies and proposals will have on the flooding issue is critical and as such should be included. In addition the indicators and targets are used for monitoring the LDP through its life, as well as providing the basis for testing the LDP during its formulation. In monitoring the LDP the report of monitoring can outline where external influences have impacted upon the LDP. Consequently it is considered inappropriate to amend or delete the indicators.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S56

**Section:** 6

**Page:** 031

**Officer:** David Lucas

**Paragraph:** 9

**Rep Type:** Objection

---

### **Representation Summary:**

Query the fact that Indicator (v) is set to the Welsh average levels, and Indicator (w) is set to UK National average levels.

---

### **Representation:**

Page 31

Population and Human Health Table

9 Health

CPRW queries the fact that Indicator (v) is set to the Welsh average levels, and Indicator (w) is set to UK National average levels.

---

### **Desired Change:**

Clarification is needed on why Indicator (v) is set to the Welsh average levels, and Indicator (w) is set to UK National average levels.

---

### **Response:**

In identifying targets for the Scoping Report for monitoring purposes there are many factors that need to be considered, such as Government requirements and targets, appropriateness of National (UK based), Welsh or local averages, need to achieve higher standards than currently achieved and the potential for influencing policy in the LDP. These are only a few of the considerations that have been incorporated into identifying the indicators.

In these instances the targets are identified in order that the Council can benchmark themselves against the most relevant level for the target. In respect of Indicator (v) the Welsh average is the most appropriate level for the target (as it would be for most targets). In respect of indicator (w) however, South Wales has a particular problem in respect of invalidity benefit which means that it lowers the Welsh average correspondingly. As such it is considered more appropriate to target the UK national average which is not as susceptible to such influences due to the extent of its coverage.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Lesley Punter  
Welsh Assembly Government

---

**Rep No:** 2282.S6

**Section:** 6

**Page:**

**Officer:** Kelly Collins

**Paragraph:**

**Rep Type:** Comment

---

### **Representation Summary:**

WAG note that the scoping report contains strong baseline data and sustainability objectives for the cultural environment

---

### **Representation:**

The SEA Scoping Report contains strong baseline data and sustainability objectives and indicators for the Cultural Environment. In its assessment of the implications for the LDP of Planning Policy Wales it also concludes that "The LDP must set out policy to preserve and enhance the historic environment. .. "

---

### **Desired Change:**

N/A

---

### **Response:**

No further action required

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S58

**Section:** 6

**Page:** 031

**Officer:** David Lucas

**Paragraph:** 11

**Rep Type:** Objection

---

### **Representation Summary:**

The target needs to be reworded to state a specific distance from people's homes.

---

### **Representation:**

Page 31

Population and Human Health Table

11 Well-Being

Indicator (z) This is too imprecisely worded. A maximum distance from people's homes to the natural greenspace should be indicated.

---

### **Desired Change:**

The target be reworded to state a specific distance from people's homes.

---

### **Response:**

The target states "Increase the percentage of population with 2 or more hectares of natural greenspace in accordance with the CCW Greenspace Toolkit" The Greenspace Toolkit identifies the parameter distances for the calculations and assessments and as such it is not necessary to specifically state them in this target.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S59

**Section:** 6

**Page:** 033

**Officer:** David Lucas

**Paragraph:** A5

**Rep Type:** Comment

---

### **Representation Summary:**

There are potential adverse impacts to increased omeworking, as well as potential benefits.

---

### **Representation:**

Page 33

Paragraph A5

2nd sentence – while home-working has undoubted benefits in terms of reducing the need for travel to employment, the ‘down side’ might be that home workers need to heat their houses during cold weather at the time of day when there would only be background heating in commuter’s dwellings. In houses that are not fuel-efficient, this could add to fuel use and to the resultant emissions.

---

### **Desired Change:**

---

### **Response:**

The paragraph acknowledges that there are potential disbenefits to home working, by identifying that increases in home working has the ability, or potential, to reduce air pollution. The paragraph does not identify home working as a method of reducing air pollution, rather it alluding to its potential for benefit.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

---

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S60

**Section:** 6

**Page:** 033

**Officer:** David Lucas

**Paragraph:** A6

**Rep Type:** Objection

---

### **Representation Summary:**

No reference is made to noise nuisance from late night eating and drinking establishments

---

### **Representation:**

Page 33

Paragraph A6

No reference is made to noise nuisance from late night eating and drinking establishments – perhaps there are not too many of these in the county borough area.

---

### **Desired Change:**

Include reference to noise nuisance from late night eating and drinking establishments in the text.

---

### **Response:**

The purpose of the Scoping Report in setting out the baseline characterisation is to identify the relevant issues facing the County Borough during the LDP period. It would be inappropriate to go further than identifying issues, e.g. by identifying specific sources of the issues, as this would make the document unnecessarily onerous by containing significant amounts of irrelevant information. Consequently it would be inappropriate to reference specific sources of any issue, unless they are specifically relevant and pertinent to the County Borough and the LDP.

The issue of noise pollution is included in the Baseline Characterisation, is identified as one of the issues and has an indicator and target associated to it as Air Pollution Indicator 1c. Therefore it is considered to be inappropriate to make an amendment along the lines of that suggested but the Representor.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S61

**Section:** 6

**Page:** 033

**Officer:** David Lucas

**Paragraph:** A7

**Rep Type:** Objection

---

### **Representation Summary:**

Other sources of light pollution exist and should be referenced.

---

### **Representation:**

Page 33

Paragraph A7

New and upgraded roads may need enhanced lighting. Light spillage must be avoided and economy of power use be adopted as common practice. As is implied in the final sentence, house security lights, especially in rural areas, can be an obtrusive element and detract from night time quality of life.

---

### **Desired Change:**

Reference be made to other sources of light pollution in the text.

---

### **Response:**

The purpose of the Scoping Report in setting out the baseline characterisation is to identify the relevant issues facing the County Borough during the LDP period. It would be inappropriate to go further than identifying issues, e.g. by identifying specific sources of the issues, as this would make the document unnecessarily onerous by containing significant amounts of irrelevant information. Consequently it would be inappropriate to reference specific sources of any issue, unless they are specifically relevant and pertinent to the County Borough and the LDP.

The issue of light pollution is included in the Baseline Characterisation, is identified as one of the issues and has an indicator and target associated to it as Air Pollution Indicator 1d. Therefore it is considered to be inappropriate to make an amendment along the lines of that suggested but the Representor.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S62

**Section:** 6

**Page:** 034

**Officer:** David Lucas

**Paragraph:** 1

**Rep Type:** Comment

---

### **Representation Summary:**

It is assumed that there are sufficient recorded complaints to enable the target to be measured.

---

### **Representation:**

Page 34

Air Pollution Table

1

Air Quality Issue

With regard to Indicators c. and d., the assumption is made that there are sufficient recorded noise and light complaints to enable the Target to be realistically measured.

---

### **Desired Change:**

---

### **Response:**

The purpose of the targets is to set a level against which the LDP can be assessed and, more importantly, monitored. The targets are set positively so that the LDP will need to improve upon the current situation in order to meet the targets, so producing a more environmentally friendly and sustainable plan. As such the levels of complaints in respect of noise and light are secondary to whether the LDP improves upon the 2005 level. As the LDP will be monitored on a yearly basis this will mean that the LDP will need to consistently improve on the 2005 level, which will result in a significant improvement overall.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S63

**Section:** 6

**Page:** 040

**Officer:** David Lucas

**Paragraph:** 1

**Rep Type:** Objection

---

### **Representation Summary:**

The indicator should relate to applications that are environmentally unacceptable.

---

### **Representation:**

Page 40

Cultural Heritage and Landscape Table

1 Landscape Issue

CPRW thinks that Indicator a. should relate to numbers of environmentally unacceptable applications refused planning permission in SLAs. As worded, the incorrect impression is given that these designated areas are sacrosanct so far as development within them is concerned. This is contrary to UDP policy and will, no doubt, be to its LDP successor.

---

### **Desired Change:**

The indicator should be reworded to reflect that it relates to environmentally unacceptable applications.

---

### **Response:**

Environmentally unacceptable applications should be refused in any event, whether in a SLA or not. That being said it is true that development can be allowed, or even encouraged within a SLA dependant upon its merits. The indicator is seeking to increae the instance that presence within an SLA is a determining factor for a development, rather than refusals being based upon the settlement boundary policies with SLA policies thrown in as additional reasons for refusal. As such the current indicator is appropriate.

---

### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S64

**Section:** 6

**Page:** 042

**Officer:** David Lucas

**Paragraph:** W1

**Rep Type:** Objection

---

### **Representation Summary:**

Reference should be made to the fact that 'hard' bank protection works will give rise to a degraded riverside appearance.

---

### **Representation:**

Page 42

Paragraph W1

It may also be the case that 'hard' bank protection works will give rise to a degraded riverside appearance.

---

### **Desired Change:**

Amend the text to include reference that 'hard' bank protection works will give rise to a degraded riverside appearance.

---

### **Response:**

It is acknowledged that hard bank protection rise can give rise to degraded river environments, although this is not always necessarily the case. As such an amendment that identifies hard banking and its potential to lead to degraded river environments should be included.

---

### **Change to SEA/SA: Yes**

Paragraph W1 of the Scoping Report be amended to read as follows:

"The county borough can be divided into three catchments, the Rhymney, Sirhowy and River Ebbw catchments. All three rivers rise on the southern edge of the Brecon Beacons before descending steeply through the valleys and then onwards across a flat plain before entering the Severn Estuary to the east of Cardiff. Each catchment can be divided into two main parts; a steep sided, wet, mountainous upper valley with limited flood plain and short steep tributaries and a flatter wider valley below, the latter is in the Machen area for the River Rhymney and the Risca Crosskeys area for the rivers Ebbw and Sirhowy which have merged at their confluence at Crosskeys. Being narrow valleys with limited flood plains many properties lie in close proximity to the banks of the main rivers and its tributaries. These urban developments and historic industrial developments have resulted in extensive river bank protection works and the loss of riverine habitats. Despite this the main rivers and tributaries follow a largely natural course, although new hard bank protection works has the potential to degrade the river environment. "

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S65

**Section:** 6

**Page:** 044

**Officer:** David Lucas

**Paragraph:** W7

**Rep Type:** Support

---

### **Representation Summary:**

A sound statement on water efficiency is made in the last sentence.

---

### **Representation:**

Page 44

Paragraph W7

A sound statement is made as to water efficiency in the final sentence.

---

### **Desired Change:**

---

### **Response:**

The support for the statement on water efficiency is noted.

---

**Change to SEA/SA:** No

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
Campaign For The Protection Of Rural Wales

---

**Rep No:** 876.S55

**Section:** 6

**Page:** 030

**Officer:** David Lucas

**Paragraph:** Issues 6, 7, 8

**Rep Type:** Comment

---

### **Representation Summary:**

Is there a good reason for setting Targets (l), (m), (o), (p) and (q) to the UK national average, and Target (u) to the Welsh average.

---

### **Representation:**

Page 30

Population and Human Health Table

Issues 6, 7 and 8

CPRW can only assume that there is a good reason for setting Targets (l), (m), (o), (p) and (q) to the UK national average, and Target (u) to the Welsh average.

---

### **Desired Change:**

---

#### **Response:**

In identifying targets for the Scoping Report for monitoring purposes there are many factors that need to be considered, such as Government requirements and targets, appropriateness of National (UK based), Welsh or local averages, need to achieve higher standards than currently achieved and the potential for influencing policy in the LDP. These are only a few of the considerations that have been incorporated into identifying the indicators.

In respect of targets (l), (m), (n), (o), (p) and (q) the UK averages provide a higher bench mark than local or Welsh averages and it is considered appropriate that these targets should be sought.

In respect of target (u) the welsh average has been used as it provides a bench mark in relation to other authorities within Wales.

These targets are still considered to be the most appropriate for the Scoping Report and LDP process and therefore no change is considered necessary.

---

#### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mr Richard Jones  
Countryside Council for Wales

---

**Rep No:** 1056.S26

**Section:** 8

**Page:**

**Officer:** David Lucas

**Paragraph:**

**Rep Type:** Objection

---

### **Representation Summary:**

This section should refer to the SA/SEA not just the SA.

---

### **Representation:**

This section should refer to the SA/SEA not just the SA as this is the common terminology.

---

### **Desired Change:**

This section should refer to the SA/SEA not just the SA.

---

### **Response:**

The term SA has been used in error. The term SA should be replaced by the term SEA/SA throughout the Chapter.

---

### **Change to SEA/SA: Yes**

Chapter 8 be amended to read as follows:

8.1

This is the first stage of the process of SEA/SA and following consultation has identified key environmental considerations that have emerged as part of the base line survey. These may be refined further in line with any additional observations received. The next stages in the process are set out below with key dates being specified. These relate to the Delivery Agreement with WAG which can be found on the Councils website.

April 2007

Pre Deposit Draft LDP and Draft Environmental Report, 6 week consultation.

2007/08

Undertake changes to LDP and SEA/SA

June 2008

Deposit LDP and Environmental Report, 6 week consultation.

October 2008

Consultation on alternative sites and check compliance with SEA/SA.

December 2008

SEA/SA Statement.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S86

**Section:** 8

**Page:** 061

**Officer:** David Lucas

**Paragraph:** 8.1

**Rep Type:** Comment

---

### **Representation Summary:**

The delivery agreement should be available in paper format on request.

---

### **Representation:**

Page 61

THE PROCESS

Paragraph 8.1

Final sentence – the Delivery Agreement should be supplied in paper format on request.

---

### **Desired Change:**

---

#### **Response:**

It is the intention of the council to undertake as much correspondence and provide as much information as possible in electronic format and as such all documents are being made available on the Council Web site and the Strategy and SEA/SA documents are available on CD. However the council is aware that some people may not have ready access to a computer and, in order to ensure that everyone has the opportunity to participate in the LDP process fully, the Delivery agreement is available in paper copy upon request.

---

#### **Change to SEA/SA: No**

No amendment be made in respect of this comment.

## SEA/SA 1: Scoping Report

---

**Objector:** Mrs Margaret Hunt  
**Campaign For The Protection Of Rural Wales**

---

**Rep No:** 876.S85

**Section:** 8

**Page:** 060

**Officer:** David Lucas

**Paragraph:** 7.1

**Rep Type:** Comment

---

### **Representation Summary:**

Should baseline data be monitored, as it is the starting point of the process.

---

### **Representation:**

Page 60

MONITORING

Paragraph 7.1

2nd sentence – CPRW is not sure about the continued monitoring of baseline data, which it thinks is properly the starting point of the process. Ought not developing data be monitored?

---

### **Desired Change:**

---

#### **Response:**

It s accepted that baseline data is identified at the outset fo the SEA/SA process in order to produce the baseline characterisation, and that it is information relevant to the targets that needs to be collected in order to enable effective monitoring of the LDP to take place. The text should be amended to reflect this.

---

#### **Change to SEA/SA: Yes**

Paragraph 7.1 be amended to read as follows:

"The regulations require that the targets set as part of the process are monitored. As such information relating ti the targets will need to be collected throughout the life period of the plan so that its success can be assessed. The indicators and targets have been identified with this in mind. It is likely that much of the information will be sought on an annual basis although this will not be available for all data and in some cases assumptions may need to be made."