

**Caerphilly County Borough  
Local Development Plan up to 2021**

**Review Report**

June 2021



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### **Glossary of Terms**

AMR.....	Annual Monitoring Report
AVHA.....	Affordable Housing Viability Assessment
CCR.....	Cardiff Capital Region
Commission.....	Growth and Competitiveness Commission
CPA Act.....	Planning and Compulsory Purchase Act 2004
DAS.....	Design and Access Statement
Environment Act.....	Environment (Wales) Act 2016
Green Paper.....	Green Paper Consultation Document - Strengthening Local Government: Delivering People.
GTAA.....	Gypsy and Traveller Accommodation Assessment
HE Act.....	Historic Environment (Wales) Act 2016
JHLAS.....	Joint Housing Land Availability Study
Joint Cabinet.....	Cardiff Capital Region City Deal Joint Cabinet
LDP.....	Adopted Caerphilly County Borough Local Development Plan up to 2021
LDP Review.....	Replacement Local Development Plan 2016 to 2031
Metro.....	South Wales Metro
MYE.....	ONS Mid-Year Population Estimate
NDF.....	National Development Framework
NIC.....	National Infrastructure Commission
ONS.....	Office of National Statistics
Planning Act.....	Planning (Wales) Act 2015
PPW.....	Planning Policy Wales
PSB.....	Caerphilly Public Service Board
Regulations.....	Town and Country Planning (Local Development Plan) (Wales) Regulations 2005: Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015
rWFD.....	Revised EU Waste Framework Directive SDP Strategic Development Plan (for the Cardiff Capital Region)
SAC.....	Special Area for Conservation
SEA Directive.....	Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment
SEA/SA.....	Strategic Environmental Assessment/Sustainability Appraisal
SEWSPG.....	South East Wales Strategic Planning Group
SINC.....	Site of Importance for Nature Conservation
SSSI.....	Site of Special Scientific Interest
TAN.....	Technical Advice Note
Taskforce.....	Valleys Taskforce

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Well-being Act..... Well-being of Future Generations (Wales) Act 2015

WLGA..... Welsh Local Government Association

### 1 Introduction

1.1 This document is the Review Report for the Adopted Caerphilly County Borough Local Development Plan up to 2021 [LDP]. This report considers the progress being made in implementing the LDP and discusses and considers the issues that inform the decision on whether the LDP needs to be revised and then makes recommendations in respect of the appropriate course of action. This Report considers:

- The plan strategy, its aims and objectives;
- Any significant changes in circumstances brought about by changes to the evidence base or contextual framework;
- The policy framework and allocations in the plan; and
- The 8 Annual Monitoring Reports [AMR].

1.2 This Report is structured as follows:

**Section 1: Introduction** - Sets out the requirements for the review of the LDP and the position in respect of the Adopted LDP.

**Section 2: External Issues and Monitoring** - Considers the implications of changes in legislation and national guidance and the findings of the Annual Monitoring Reports in respect of the LDP.

**Section 3: The LDP** – Considers how the plan is being implemented and identifies issues arising that need to be addressed. In particular it considers the Vision, the Aims, the Objectives, Policy Framework and Allocations of the LDP. In addition to this it also considers the Strategic Environmental Assessment and Sustainability Appraisal and its Monitoring over the plan period.

**Section 4: Evidence Base** – Sets out where updating or new evidence is required for a revision of the plan.

**Section 5: Options and Conclusions** – Considers the options for moving forward and recommends the preferred course of action.

**Section 6: Next Steps and Arrangements** – Outlines the next stages in the review process and any procedural arrangements that could be pursued.

#### **The Need to Review**

1.3 Section 69 of the Planning and Compulsory Purchase Act 2004 [CPA Act] requires local planning authorities to carry out a review of their local development plan at times prescribed by the Welsh Government [WG]. Regulation 41 of the Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015 [Regulations] requires that a review of the LDP should commence “every four years from the date of its initial adoption”.

1.4 It should be noted that a review of the plan is an assessment of whether the plan is being implemented in line with the strategy. This is different from a revision of a plan, which is the formal process for producing a new or revised version of the plan. The Regulations require local planning authorities to undertake a review of their adopted development plan at least every 4 years. However, this does not mean that the plan will be revised every 4 years, as the review will consider whether a revision of the plan is necessary. If the review finds no grounds for the plan to be revised then no change will be made.

- 1.5 The Regulations require that the review must be submitted to WG in the form of a report, after it has been reported to and agreed by the Council.

### **Current Position - The Adopted LDP**

- 1.6 The LDP was formally adopted on 23 November 2010. The LDP sets out the Council's landuse strategy for the fifteen years of the plan period, i.e. 2006 – 2021. It sets out the vision for the future and the aims and objectives that would deliver the vision. Most importantly the LDP sets out the policy framework to control and guide development for the plan period.
- 1.7 As the Council's primary landuse strategy it is important that it is kept up to date. It is a statutory requirement that all Adopted LDPs be subject to annual monitoring, to monitor whether the strategy is being implemented and every 4 years, or earlier if the annual monitoring indicates so, be subject of a review.
- 1.8 The LDP has been the subject of 8 Annual Monitoring Reports since its Adoption in 2010, the first Report being prepared and published in 2012. The second AMR Report, covering the period of 1 April 2012 to 31 March 2013, concluded that the Adopted LDP should be revised for two reasons:
- To allocate additional housing land to meet affordable housing and housing needs of the county borough, and
  - To make appropriate allocations to facilitate the 21st century schools programme.
- 1.9 A Review Report was prepared as part of this process in November 2014. This Report, however, was prepared in advance of the publication of the Regulations.
- 1.10 The revision of the LDP commenced in 2013 and was progressed through to Deposit Stage in 2016. However, following the Deposit Consultation Period the Council resolved to withdraw the replacement plan, with a recommendation of pursuing the early preparation of a Strategic Development Plan [SDP] for the Cardiff Capital Region. The LDP remains the development plan for Caerphilly County Borough.
- 1.11 The South East Wales Strategic Planning Group (SEWSPG) held two workshops with the Cardiff Capital Region City Deal Leaders, Chief Executives and Planning Directors to discuss issues relating to the governance and content of the SDP. In January 2018 the Cardiff Capital Region Cabinet agreed the principle of preparing the SDP for the region and in June 2019 the Cabinet endorsed a report recommending the commencement of the SDP, which was to be presented to each of the 10 constituent local authorities for their agreement to commence the process. To date 8 of the authorities have presented the report to their respective Councils and all 8 have accepted the recommendations.
- 1.12 The decision to withdraw the Replacement LDP in 2016 included four recommendations, namely:
- To consider the content of the report and in particular the implications associated with the alternative options for progressing work on the development plan for Caerphilly County Borough.
  - To work with all local planning authorities across the Cardiff City Capital Region to prepare a Strategic Development Plan in line with the signed City Deal Agreement at the earliest possible time.
  - Subject to Ministerial Approval, formally withdraw the Deposit Replacement Caerphilly County Borough Local Development Plan up to 2031.

- Seek an urgent meeting with the WG Minister to advise on the intention to withdraw the Deposit Replacement LDP and seek support for the preparation of the SDP as a matter of urgency.
- 1.13 As can be seen the recommendations clearly seek the early preparation of the SDP before commencing any further revision of the LDP. The Council considered a report on the SDP at its meeting on 23 October 2019 and agreed to commence the preparation of the SDP for the Cardiff Capital Region. As a result the recommendation seeking the early commencement of the SDP has been achieved. Consequently, this recommendation no longer provides a reason to delay the revision of the LDP.
- 1.14 As part of a review of the planning process Welsh Government proposed introducing Corporate Joint Committees (CJC) for regions identified in Wales, one of whose responsibilities would be to prepare the Strategic Development Plan for the region. The provisions for establishing the CJs are set out in the Local Government and Elections (Wales) Act which was enacted on 20 January 2021. As the CJC will be responsible for delivering the SDP for the Cardiff Capital Region collective work on progressing the SDP was halted toward the end of 2019.
- 1.15 All of the AMRs, since 2013, have reached the same conclusion in respect of the implementation of the Adopted LDP, i.e. that the plan should be reviewed to address the housing provision position and also other matters relevant at the time of the preparation of each AMR, including the needs of the 21<sup>st</sup> Century Schools programme and the availability of land for economic development. The 2019 AMR, which was approved at the Full Council Meeting on 23 October 2019, also reached the same conclusion. On 7<sup>th</sup> July 2020 the **Minister** for Housing and Local **Government** issues a letter setting out a number of Covid-19 responses and actions, one of which was to remove the need for local planning authorities to prepare an AMR for 2020, although an AMR covering both years would subsequently be required in 2021. In response to this letter the Council has not prepared an AMR for 2020. However, in order to address the key issue of housing land the Council agreed
- 1.16 Notably the 2017 and 2018 AMRs have taken account of the Council recommendations in withdrawing the Replacement LDP, i.e. to seek the early preparation of the SDP, consequently neither of these AMRs recommended that a revision of the Adopted LDP should be commenced, as this would prejudice the early preparation of the SDP. Given that this requirement has now been met, the 2019 AMR recommended:
- R1 The 8th Annual Monitoring Plan has indicated that substantial progress has been made in implementing the Caerphilly County Borough Local Development Plan up to 2021.**
- R2 In recognition of the need to identify more land for employment and housing to support local need and regional aspirations the 8<sup>th</sup> Annual Monitoring Report recommends that a review of the Adopted LDP be commenced.**
- R3 In the period up to the adoption of a new Replacement LDP, the Council will continue to address the shortfall in the 5-year housing land supply through proactive action, including:**
- Considering proposals for new residential development on their relative planning merits on a site-by-site basis and have due regard for the need to increase the housing land supply in line with national planning policy and guidance;
  - Lobbying Welsh Government to establish funding mechanisms to incentivise sites in low viability areas and promote remediation of suitable brownfield sites for development;
  - Utilising the innovative funding model to bring forward Council owned sites with viability issues;

- The identification of schemes through the Regeneration Project Board where funding opportunities could be exploited to deliver regeneration projects, including for housing and employment.
- Prioritise affordable and new build Council housing on brownfield sites to help preserve our natural environment
- Work to ensure new housing complies with high environmental standards to help address the climate emergency

1.17 On 7th July 2020 the **Minister** for Housing and Local **Government** issues a letter setting out a number of Covid-19 responses and actions, one of which was to remove the need for local planning authorities to prepare an AMR for 2020, although an AMR covering both years would subsequently be required in 2021. In response to this letter the Council has not prepared an AMR for 2020. However, in order to address the key issue of housing land the Council considered and agreed a Housing Delivery Paper, which set out a proposed housing delivery trajectory for the next 5 years and also made the same recommendations in respect of the LDP that had been made in previous AMRs

### **Should the Adopted LDP be Revised?**

1.18 As outlined above all of the AMRs since 2013 have concluded that a review of the LDP was required. However, the withdrawal of the Replacement LDP at its Deposit stage modified the position to one that sought early preparation of a SDP. This condition has now been met by virtue of the Council resolution of the 23 October 2019. With these requirements having been met, there are no other factors that would modify the findings of the Council AMRs.

1.19 Whilst previous AMRs have consistently identified the need to address housing delivery and to make provision for the 21<sup>st</sup> Century schools programme, recent AMRs have realised increasing numbers of the strategic policies reaching their trigger points for consideration through the AMR. Given that the LDP is in its last year of the plan period, it is only expected that policies will reach their trigger points, as things will have changed markedly since their drafting and Adoption. As a result the need for review extends beyond the two issues set out in the Council resolution withdrawing the Replacement LDP.

1.20 **Therefore, it is the conclusion of the Review Report that a full revision of the Adopted LDP should be commenced as a matter of priority.**

### 1. External Issues

#### **External Issues (Legislative Change and other Matters)**

- 2.1 Legislation and national planning guidance play an important part in the planning system. When a LDP is adopted it conforms to the latest legislation and guidance at that time. However, once the LDP is adopted it cannot be changed further and any subsequent changes to legislation or guidance cannot be accommodated within it. As a result when an adopted plan is reviewed a key consideration will be whether legislation or guidance has changed so significantly that it would necessitate a revision of the plan.
- 2.2 As a result the Review Report will need to consider the changes in legislation, guidance and any other material change in circumstances, to determine whether the context for the plan has changed so significantly that a revision to the plan is necessary.

#### **Legislation**

- 2.3 The period since the adoption of the LDP has seen significant changes in legislation, with new legislation being enacted, and existing legislation being expanded or amended. The principal changes are listed below in chronological order:

#### **Energy Act 2013 and Prosperity for All: A Low Carbon Wales (2019)**

- 2.4 The Energy Act 2013 (Energy Act) was introduced with two primary aims, namely introducing the provision for government to set decarbonisation targets and to provide the framework for the reform and control of the energy market.
- 2.5 The key impacts upon the development plan arising from this legislation relate to renewable energy and decarbonisation targets that are set by WG. In 2017 the WG Cabinet Secretary for Energy, Planning and Rural Affairs set out the ambition to achieve a carbon neutral public sector in Wales by 2030 and set a target of 70% of Wales' energy consumption to be generated from renewable resources.
- 2.6 In 2019 Welsh Government published Prosperity for All: A Low Carbon Wales, which is Wales' commitment to tackling climate change. This sets out 100 policies and proposals that will directly reduce emissions and support the growth of the low carbon economy, and sets the foundations for the transition to a low carbon society in Wales.
- 2.7 In addition to this in December 2019 Welsh Government published Prosperity For All: A Climate Conscious Wales, which is Wales' plan to address climate change adaptation. It assesses climate change risk, identifying areas that require more robust evidence to consider the risk, and sets out actions in relation to climate change that:
- Have already been taken,
  - Are required in the short term, or
  - Are required to be taken in the medium term.

- 2.8 Both Future Wales – the National Plan 2040 [Future Wales 2040] and Planning Policy Wales Edition 11 [PPW] form part of the policy framework for tackling climate change and the Revision of the LDP will need to actively promote sustainable development and address climate change.

#### **Housing (Wales) Act 2014**

- 2.9 One of the aims of the Housing Act was to assist in improving the supply, quality and standard of new housing in Wales. It also requires local authorities to undertake an assessment of the accommodation needs for Gypsies and travellers, through the

preparation of Gypsy and Traveller Accommodation Assessments [GTAA], which would consider the need for new permanent and transit provision.

### The Planning Wales Act 2015 [Planning Act]

- 2.10 The Planning Act was enacted following a review of the planning system in Wales and sought to build on and enhance the existing system rather than setting out a new system. The Act sought to deliver reform to ensure that the system was fair, resilient and enabled development and strengthened the plan-led approach. The Act introduced a number of changes to the former system, including the following key changes:
- The Act makes provision for the preparation and revision of a National Development Framework for Wales [NDF].
  - The Act makes provision for Welsh Ministers to designate areas of Wales as strategic planning areas within which a SDP will be prepared.
  - The Act requires local planning authorities to consider a review of their Adopted Plans upon the publication of the NDF or the SDP for the area.
- 2.11 The Planning Act establishes the basis for the regionalisation of planning and transport, through its provisions for Strategic Development Plans and joint working. The Cardiff Capital Region requires a strategic level of planning to deliver its aims and objectives and the provisions within the Planning Act allow joint working between the local authorities to achieve this.
- 2.12 In June 2019 the Cardiff Capital Region Joint Cabinet (Joint Cabinet) endorsed a committee report recommending the commencement of the SDP, which was to be presented to all 10 local authorities in the region. To date the report has been reported to 8 of the 10 local authorities, all of whom have agreed the recommendation to commence the SDP. The remaining 2 authorities are expecting to take the report to their Councils early in the new year.

### Well-Being of Future Generations (Wales) Act 2015

- 2.13 The aim of the Well-being of Future Generations (Wales) Act 2015 [Well-being Act] is to improve the social, economic, environmental and cultural well-being of Wales by changing the way local authorities and public bodies think, act and make decisions. It sought to ensure that sustainable development is at the heart of government and public bodies. The overall objective is to create a Wales where we want to live in, both now and in the future.
- 2.14 The Act sets out 7 goals that establish a shared vision for Wales. All public bodies, including local authorities are required to work towards achieving all 7 goals. The Act also seeks to ensure that public bodies apply the sustainable development principle by ensuring they have considered the five ways of working based on 5 elements.
- 2.15 The Act requires that public bodies work together in a more holistic fashion and also requires them to prepare statements or Well-Being plans, which sets out their collective action for the future.

### Environment (Wales) Act 2016

- 2.16 The Environment (Wales) Act 2016 [Environment Act] sets out legislation in respect of the environment and climate change, and makes provision for a range of actions to deliver effective protection of the environment and to tackle climate change. The principal issue for development plans is the requirement for local authorities to maintain and enhance biodiversity.
- 2.17 The Environment Act places a duty on Natural Resources Wales to prepare area statements for the whole of Wales that will facilitate the implementation of national natural

resources policy. The area statement will comprise an important element of the evidence base that will underpin the revised LDP

### Historic Environment (Wales) Act 2016

2.18 The Historic Environment (Wales) Act 2016 [HE Act] amends two existing pieces of legislation, namely the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990. The Act sets out a wide range of provisions that seek to deliver its three aims:

- to give more effective protection to listed buildings and scheduled monuments;
- to improve the sustainable management of the historic environment; and
- to introduce greater transparency and accountability into decisions taken on the historic environment.

2.19 The key issue for development plans is the requirement to provide more effective protection for Listed Buildings and Scheduled Ancient Monuments.

### Equality Act 2010 – The Socio-Economic Duty

2.20 The Socio-economic Duty was introduced in Wales on 31 March 2021, under powers given to Welsh Minister under the Equalities Act 2010. The aim of the duty is to deliver better outcomes for those who experience socio disadvantage, by requiring decision makers to:

- take account of evidence and potential impact of their decisions
- take decisions through consultation and engagement
- understand the views and needs of those impacted by the decision, particularly those who suffer socio-economic disadvantage
- welcome challenge and scrutiny
- drive a change in the way that decisions are made and the way that decision makers operate

### The Significance of the Legislative Changes

2.21 All of the legislation makes provisions for future actions, but do not make any of their provisions applicable to existing documents. As a result they do not have a direct implication for the LDP. However, the legislation brings in changes to both policy and procedure that need to be addressed as part of the planning process. Whilst there are no direct impacts, changes in procedure and policy may require the LDP Policy framework to be considered slightly differently than previously and this may give rise to confusion or conflict. The particular provisions within the legislation that could give rise to these issues and the key areas are:

- The Council has undertaken its GTAA, as required by the Housing Act and, whilst the findings for this assessment are similar to those used to inform the LDP, there is no guarantee that this position will not have changed when the GTAA is reviewed. This could easily result in additional requirements that the LDP has not made provision for.
- The Planning Act has introduced new documents that will impact upon the national policy framework. The NDF at Welsh level and SDPs at regional level will include both policy and strategy provisions that could be in conflict with the LDP.
- Similarly the Well-Being Act requires that a Well-Being Plan be prepared. Whilst this may not be a primary land use document, development plans need to reflect the content of these plans. The LDP was drafted in conformity with the Council's Community Plan. However since then Community Plans have been superseded by Single Integrated Plans and now by Well-Being Plans. Given that development

plans need to be in conformity with these plans when they are prepared, potential inconsistencies between a newly prepared Well-Being Plan and the LDP could undermine the policy framework.

- In addition to the above, the Well-Being Act also introduces the 7 goals and 5 elements of decision making that need to be integrated into the development plan. Whilst the LDP meets all of these requirements, it is not demonstrated within the document itself. Given that the 5 elements of decision making are intended to be fundamental to the delivery of sustainable development, concern could be raised in respect of whether the LDP is delivering sustainable development in accordance with the Well-being Act.
- The Biodiversity Duty for local authorities, in conjunction with the policy drivers for decarbonisation that cut across legislation, increases the importance of environmental functionality that will require increased ecosystem services management. This will need to be reflected within any revision of the LDP.
- Both the Environment Act and the Historic Environment Act seek to provide effective protection of the natural and built environment. Whilst the protection and enhancement of the natural environment is included in the LDP, the plan does not include specific historic environment policies on the basis that national policy sets out the policy for addressing the historic environment and repetition of national guidance in development plans should be resisted.

2.22 Whilst legislative changes do require different approaches in the preparation of LDPs, there are no specific changes that would directly require a review of the LDP be undertaken.

### **National Policy & Guidance**

#### *Planning for Climate Change (2010)*

2.23 The Climate Change Strategy sets out the overarching principles for WG to realise a low carbon economy, limit greenhouse gas emissions and adjust to changes in our climate. The principal implication for the LDP relates to the aim of maximising renewable and low carbon energy generation. There are no direct implications for the LDP.

#### *A Low Carbon Revolution – The Welsh Assembly Government Energy Policy Statement (2010)*

2.24 The statement sets out what WG will do, and the contribution and actions that others will need to make, to realise the national targets for low carbon energy. The document expands on UK Targets for renewable energy generation and provides challenging targets for the Wales context. The document also considers each area of renewable generation, assessing its capacity to contribute toward the overall target. There are no direct implications for the LDP.

#### *Wales Infrastructure Investment Plan (2012) and Project Pipeline Update 2019*

2.25 The Wales Infrastructure Investment Plan 2012 committed the Welsh Government to improving the transparency and visibility of project funding through regular reporting on the pipeline of infrastructure projects. To date there have been 8 Pipeline Reports that have outlined progress and have set future aspirations, with the latest of the Pipeline Reports being published in 2019.

2.26 The 2019 Pipeline Report sets out large scale funding projects and smaller scale projects for each local authority area. The principal projects identified for Caerphilly County Borough are:

- Caerphilly 21<sup>st</sup> Century Schools;
- Coleg Y Cymoedd;

- Social Housing Grant;
- Highways Improvements;
- Welsh Housing Quality Standard (WHQS);
- Corporate Buildings;
- Mandatory Disabled Facilities Grant;
- Home Repair Grant – vulnerable persons (Private housing);
- Corporate Projects;
- Salix Street lighting Programme;
- European Regional Development Fund (ERDF) – Ty Du;
- ERDF – Lawns Industrial Estate – units.

### Future Wales 2040, February 2021

2.27 Future Wales 2040, the final version of the national development framework was published in February 2021. The document sets out the national perspective on planning issues across Wales and sets out:

- 11 outcomes for Future Wales 2040
- 7 questions to monitor Future Wales 2040 at the first review
- A National Growth area for Cardiff Newport and the valleys
- Strategic Policies on Placemaking, Public Sector Leadership, Rural communities and the rural economy, Town centres, affordable homes, Flooding, resilient ecological networks, connectivity (international, national and regional), digital infrastructure, renewable energy and heat networks, and a national forest.
- The role and remit of regional bodies overseen by Corporate Joint Committees.
- Policies for the south east region including National growth areas, Green Belts, the Valleys Regional Park and the South East Metro.

2.28 It is a statutory requirement for the R2LDP to be in general conformity with Future Wales 2040 and as such the new plan will need to take account of the policy framework in it in preparing the plan.

### Local Development Plan Manual: Edition 3, August 2015

2.29 The LDP Manual was amended to take account of the changes to the LDP preparation process, which were set out in the Planning Act. The LDP Manual is the process guide to preparing Local Development Plans in Wales and is not a policy document. As such the Manual specifically applies to emerging plans, rather than adopted ones and as such the changes in the document would need to be taken into account in any review of the LDP.

2.30 It should be noted that the Draft Development Plans Manual is in the process of being rewritten to reflect changes in legislation, and was the subject of a public consultation exercise which ended 30 August 2019.

### Planning Policy Wales [PPW]: Edition 11 (2021)

2.31 PPW has undergone 7 sets of changes since the LDP was adopted in 2010. When the LDP was adopted PPW Edition 3 had just been published and had incorporated changes in respect of amendments to Rural Planning Policy. These changes were reflected in the LDP. The changes that have been made to PPW since the adoption of the LDP are:

- Edition 4 Feb (2011)
  - Include references to the Climate Change Strategy for Wales.

- Reflect Version 3 of code for sustainable homes.
- Policy changes following consultation on renewable and low carbon energy.
- Edition 5 (Oct 2012)
  - Include the presumption in favour of sustainable development.
  - Changes to economic development policy to reflect WG research.
- Edition 6 (Feb 2014)
  - Reflect changes due to revised Waste Framework Directive.
  - Updated to reflect newly publish TAN23 Economic Development.
- Edition 7 (July 2014)
  - Changes resulting from amendments to Part L of the Building Regulations.
- Edition 8 (Jan 2016)
  - Changes to LDP process as a result of the review in to the planning system.
  - Sustainability section amended to reflect the Well-Being Act requirements.
  - New minerals chapter included incorporating previous MPPW (2008).
- Edition 9 (Nov 2016)
  - Wider ranging changes to reflect the Planning (Wales) Act 2015 [Planning Act].
- Edition 10 (December 2018)
  - Restructured to reflect The Well-being of Future Generations Act.
- Edition 11 (February 2021)
  - Revised to take account of Future Wales 2040
  - Revised to take account of the revocation of TAN 1, setting out the requirement for housing delivery trajectories in development plans and monitoring housing delivery against the trajectories as the means of monitoring housing delivery across Wales.

2.32 Whilst there have been significant changes to PPW since the adoption of the LDP, the changes have not compromised the policy framework within the LDP or its implementation. As a result the changes to PPW do not require a review of the LDP.

### Good Practice Guidance for the Historic Environment

2.33 This is a suite of nine documents that have been published as part of the revisions brought in by the Historic Environment Act 2016. The documents set out good practice guidance on historic environment matters. This guidance is at a more detailed level than the policy framework in the LDP, providing good practice guidance on day to day process of managing the historic environment. As a result they do not impact on the LDP Policy Framework.

### Natural Resources Policy 2017

2.34 Published in accordance with the Environment Act with a focus on the sustainable management of Wales' natural resources, maximising their contribution towards achieving well-being goals. The NRP sets out three National Priorities:

- delivering nature-based solutions;
- increasing renewable energy and resource efficiency; and
- taking a place-based approach.

2.35 The NRP also sets the context for Area Statements, which must be taken into account in development plan preparation. Natural Resources Wales is currently in the process of preparing the Area Statements, which are not yet complete, and any revised LDP will need to take these into account

- 2.36 Overall, whilst introducing significant procedural changes, the changes to National Policy and Guidance are not of such significance as to warrant a review of the plan.

### Technical Advice Notes [TANs]

#### Technical Advice Note 21: Waste (February 2014)

- 2.37 This revision introduced 4 main changes:

- Revocation of Regional Waste Plans;
- Requirement to annual monitor waste activity;
- Introducing minimum levels of landfill capacity;
- Introduction of Waste Planning Assessments.

- 2.38 The changes to TAN 21 relate to the background information used to prepare developments plans rather than impacting directly upon the policy framework.

#### Technical Advice Note 23: Economic Development (February 2014)

- 2.39 This TAN was published for the first time in February 2014. The main issues in the TAN are:

- Requires robust evidence to inform plan preparation;
- Local Authorities should group together to prepare regional/sub-regional assessments of the commercial and industrial markets;
- Sets out stakeholders to include in the preparation of assessments and plans;
- Local authorities required to assess economic benefit of allocations and planning applications for economic development;
- Establishes tests for applications that cause harm to social or environmental objectives;
- Requires site allocations that will deliver economic development, whilst existing sites that are unlikely to deliver economic development should not be allocated.

#### Technical Advice Note 1 – Joint Housing Land Availability Studies

- 2.40 On 26 March 2020 the Minister for Housing and Local Government issued a letter to Local Planning Authorities, the Planning Inspectorate and the Home Builders Federation that advised that TAN 1 had been revoked in its entirety and changes to PPW had been made to reflect the new requirement for development plans to set out clear housing delivery trajectories and that housing delivery would be monitored against those trajectories. The revocation of TAN 1 removed the 5-year land supply policy and requirement. The emerging plan will need to address the new requirements including setting out a housing delivery trajectory in the emerging plan for the delivery of housing throughout the plan period.

#### Technical Advice Note 12: Design (March 2016)

- 2.41 The Planning Act removed the requirement to submit Design and Access Statements [DAS] as part of a planning application. TAN 12 has been revised to include the requirement to submit a DAS as part of a planning application to ensure this requirement is maintained in Wales. This change affects development management rather than planning policy and so has no impact on the LDP.

#### Technical Advice Note 4: Retail and Commercial Development (November 2016)

- 2.42 This revision provides further detailed guidance on a range of retail issues including:
- Strategies and hierarchies;
  - Sequential and needs tests;

- Retail impact assessment, including the requirement to submit one as part of a planning application for retail developments;
- Changes of use;
- Mezzanine floors;
- Indicators of vitality and viability.

2.43 This revision does not introduce any provisions that the LDP does not currently cover.

Technical Advice Note 24: The Historic Environment (May 2017)

2.44 This new TAN sets out guidance in respect of provisions set out in the Historic Environment Act. As the LDP relies on national guidance for its policy framework for considering historic environment developments, the publication of the TAN, whilst changing the framework, does not change the position in respect of the development plan. As a result the publication of this TAN does not have any significant implications that would require a review of the plan.

Technical Advice Note 20: Planning and the Welsh Language (October 2017)

2.45 This amendment to TAN 20 has incorporated changes arising from The Planning Act. These include the provision for promoting places where community life can take place in Welsh, with seeking to encourage local authorities to view such development as vital to the future of the Welsh language.

2.46 Whilst expanding on previous guidance the implications are primarily for an emerging plan rather than an adopted one, so the implications from this update do not justify a review of the LDP.

2.47 Overall, changes to the TANs, whilst changing the policy guidance framework, do not significantly affect the LDP and therefore, are not themselves a reason to trigger the review

### **Other Matters**

2011 Census

2.48 In preparing the LDP, the strategy was based on a moderate growth in population. Moderate growth was the mid-point between high growth, based on the net migration rate for Caerphilly County Borough reflecting the average for South East Wales, and low growth, based on balanced migration with the same number of people moving in to and out of the county borough.

2.49 Moderate Growth realised a population increase of 6,200 from 171,300 at the base date of the plan (2006) to a population of 177,500 at the end of the plan period (2021). The annual increase in population equated to 411 persons, 165 from net in-migration and 246 through natural change (births over deaths). Whilst the level of in-migration was higher than had been experienced in the years preceding 2006, it was a level that could reasonably be achieved during the plan period.

2.50 The publication of data from the 2011 Census indicated that the population for Caerphilly County Borough was 178,806. This figure was higher than the projected population at the end of the Adopted plan period and significantly higher than had been projected for 2011 (173,400). It was also notably higher than previous mid-year estimates [MYE] and the 2011 population for both the 2006 and 2008 WG population projections.

2.51 In light of the differences between the 2011 Census figures and earlier estimates, the MYE for 2002-2010 for Wales were revised. In Caerphilly's case, the MYE for each year has been revised upwards. Whilst the natural change and migration figures had increased slightly, the main reason for the differences between the old and revised Mid-Year

Estimates is 'unattributable change'. The unattributable change accounts for 5000 people and the Office of National Statistics [ONS] has indicated that this may be due to a combination of potential inaccuracies in respect of:

- Internal migration, particularly due to problems in accurately estimating certain moves, such as young people finishing further education courses;
- International migration, due to different methods of calculating immigration;
- 2001 population estimates, which were based on the 2001 census;
- 2011 Census estimates, as an estimate needed to be made for the number of people who didn't appear on a Census form;
- Prisoner definitions, which changed.

2.52 Given that the differences between the old and revised MYEs cannot be fully explained, caution needs to be applied to any assumptions made in respect of population change through the plan period, as the population increase could have happened in the period 1991 – 2001 and had been under-enumerated in the 2001 Census, rather than the growth taking place between 2001 and 2011. This uncertainty makes it difficult to consider the implications of the 2011 Census and whether the expected level of population growth has been realised in the plan period.

2.53 The estimated population as of 30th June 2018 MYE was 181,019. The components of change since the 2011 Census indicate:

- Growth through natural change has been positive at an average growth of 256 people per annum;
- The natural change growth is marginally higher than the assumptions in the LDP of 246 per annum;
- Net migration (including unattributable change) has been variable with figures ranging between -180 (loss) and 305 (gain) net migrants per annum and amounts to just 63 people over the period, compared to a net migration figure of 165 people per annum in the LDP;
- In several years since 2011 it has been the case that internal migration has been negative (i.e. more UK born citizens moving out of Caerphilly than moving in);
- In most years the trend has been for positive migration figures for international migrants.

2.54 Welsh Government are in the process of preparing the 2018 based population and household projections and it is anticipated that these will be published in early 2020. These 2018 projections will form part of the evidence base for future housing requirements.

2.55 Overall, there has been population growth in the county borough over the plan period. However, the MYE identifies that younger age groups are decreasing, whilst older age groups, particularly those over retirement age, are increasing significantly. The loss of the younger age groups means that for the current and subsequent plan periods the workforce in the county borough will be reducing, whilst increasing numbers of retired people place an extra burden on resources that are funded by the economically active. As a result there is greater pressure on the decreasing numbers of people in employment to support an increasing number of people who are not in work. This is an issue that will need to be addressed through any review of the LDP. The difficulty in determining whether the population growth set out in the LDP is being achieved, and the unsustainable form of growth that is manifesting itself following the 2011 Census, raises significant concern over whether the LDP is delivering the strategy in terms of its expected population growth and

demography. Given this, it is considered that a review of the LDP is required to consider and address these issues.

### Census 2021

- 2.56 The National Census was undertaken on 21 March 2021. Data from the Censuses does not generally become available until at least 2 years from the census date. On this basis the 2021 Census data is anticipated to start becoming available in 2023, which is during the period moving towards the anticipated Deposit Consultation stage of plan preparation.
- 2.57 The 2021 Census data will provide an up to date snapshot of the demographics for the county borough. However, it should be noted that the R2LDP is a 15-year document and will be based upon trends across the 15-year period. Whilst the Census data may indicate changes to the base information in respect of the plan evidence base, account can be taken of this as part of the preparation process and these changes can be incorporated with the overall plan framework that seeks to deliver up to 2035.
- 2.58 Whilst the emerging Plan will need to fully take account of the 2021 Census data, it is not anticipated that this would require a significant change of policy at that stage.

### The Regionalisation Agenda

- 2.59 There has been a significant move towards a regional approach to addressing principal planning and transport issues. Transport has a history of being addressed regionally, through regional transport plans, and the former regional transport body South East Wales Transport Alliance (SEWTA) – superseded by the Cardiff Capital Region Transport Authority (CCRTA) as part of City Deal. However, strategic planning has been dealt with almost exclusively at a local authority level. As a result the consideration of planning at a more strategic regional level is a significant change to the position when the LDP was adopted. Provisions for the preparation of SDPs and the inclusion of joint working between authorities in the Planning Act support and facilitate the regionalisation of planning.
- 2.60 There have been three recent elements that have reinforced the regional approach to planning and transport and these are:

### The Valleys Taskforce

- 2.61 The Valleys Taskforce (Taskforce) was set up by the Welsh Government in June of 2016 to review and address economic issues across the South Wales valleys that is broadly located between the Brecon Beacons National Park and the M4, covering all of the South Wales valley areas. The remit of the Taskforce is to consider necessary actions to address economic issues across the whole of the valleys, and deliver real change within them. As such the Valleys Taskforce operates at a strategic, arguably wider than regional, level, considering related economic development, planning and transport issues across the area.
- 2.62 In addressing its remit the Taskforce published the first iteration of “Our Valleys, Our Future” in 2017. Our Valleys, Our Future is the Taskforce’s plan, covering the period up to 2021, addressing the issues through a number of actions grouped under 3 priority areas:
- Priority 1: Good quality jobs and the skills to do them
  - Priority 2: Better public services
  - Priority 3: My Local Community
- 2.63 The delivery plan sets out actions that are intended to be undertaken within the plan timeframe (up to 2021) so they are not exhaustive, as it is intended that the plan will be revised over time. A key outcome of the work of the Taskforce is the identification of Strategic Hubs, which will be the subject of focussed public sector investment targeted at

attracting private investment and creating jobs across the region. Strategic Hubs have been identified at locations that are accessible within 45 minutes of people in the valleys by public transport.

2.64 Caerphilly/Ystrad Mynach has been identified as 1 of 7 Strategic Hubs in the VTF area and includes proposals for:

- Strategic employment and residential site;
- Employment hubs linked to strategic transport infrastructure improvements;
- Town centre redevelopment;
- Tourism and cultural development;
- Residential development.

### **City Deal and The South Wales Metro (Metro)**

2.65 The South East Wales region is entering a significant period of change. In February 2016, the Council agreed that the authority (through the Leader) should formally sign a commitment to participate in the City Deal initiative, a £1.2 billion programme to regenerate the economic fortunes of the South East Wales region. Subsequently, in March 2016, the City Deal agreement was signed by the ten local authority Leaders, the First Minister for Wales and the Chief Secretary to the Treasury. The City Deal sets out a transformative approach to how the Cardiff Capital Region will deliver the scale and nature of investment needed to support the area's growth plans, a key element of which is the delivery of significant public transport improvements that will facilitate the Region's economic growth aspirations.

2.66 City Deal seeks significant economic growth throughout the Cardiff Capital Region (CCR), with the focus on Cardiff as the economic engine for the CCR. A key element in the proposals is the Metro, a new transport system for the region that will transform the way people travel around the region providing faster, more frequent and joined up services using trains, buses and rail. Together the City Deal and Metro has the potential to realise significant changes to the county borough in the near future and could bring wide spread changes to the county borough's economy that could be realised over a relatively short timeframe.

### **The Growth and Competitiveness Commission**

2.67 The Growth and Competitiveness Commission (Commission) was established as part of the City Deal agreement between the UK Government, the Welsh Government and the ten local authorities of the CCR. The remit of the Commission was set out in the City Deal Agreement as follows:

- Review the evidence about the functional economic area and advise how best to generate Gross Value Added growth and support the ambitions of a dynamic capital region in a successful Welsh Economy.
- Examine the challenges and opportunities for economic growth and competitiveness and make recommendations for how the CCR can achieve its full growth potential, and contribute most to the Welsh economy.

2.68 In 2016 the Commission published its report and recommendations. It considered the spatial development throughout the Capital region, concluding that "*the Cardiff Capital Region is not homogeneous; it consists of diverse places each with distinctive histories, strengths, challenges and opportunities.*"

- 2.69 Its findings recommended “*With differences in economic performance and outcomes across the city-region there is a clear need to ensure that the region is organised spatially in a way that maximises the benefits for residents*”
- 2.70 The report recommended that the Capital Region develops a spatial perspective, complementing the economic strategy, that define the roles of::
- Cardiff and Newport as established hubs of business, commerce and institutions, each playing to their particular strengths;
  - Cardiff Airport and the associated Enterprise Zones;
  - The re-emerging towns such as Bridgend, Barry, Caerphilly and Pontypridd that are in transition to accommodating high value-added activity, renewed resident populations and university expansions; and
  - The Valleys and rural towns which are becoming increasingly important centres for local services, amenities and the foundational economy, and are developing their roles in tourism and leisure.
  - The environment in the growth and regeneration of the valleys with the Valleys Regional Park being developed to secure a range of long lasting benefits associated with the environment and well-being.
- 2.71 In January 2018 the Joint Cabinet agreed in principle the preparation of a SDP for the Cardiff Capital Region City Deal area, and in June 2019 endorsed a report to be presented to each of the 10 constituent local authorities of the region seeking their agreement to commence work on the SDP. To date 8 local authorities have presented this report to their Councils and all 8 have agreed to commence work on the SDP. The remaining 2 authorities are due to present the report to their councils early in 2020.

### **Strategic Development Plan**

- 2.72 A key issue to arise from the work undertaken in respect of the City Deal is the potential for a regional level of development plan, a SDP. The Planning Act makes provision for Strategic Development Plans to be prepared.
- 2.73 The Local Government and Elections (Wales) Act 2021 introduced the provisions to set up Corporate Joint Committees [CJC] for designated Regions within Wales. The Regions were to be defined by the National development Framework (Future Wales 2040) and one of the responsibilities of the CJC is to prepare a Strategic Development Plan for their region. Future Wales 2040 identifies South East Wales as one of the regions in Wales and, as such, the CJC for the region will be responsible for delivering the SDP.
- 2.74 Whilst setting up the CJC and commencing the preparation of a SDP will take time, the R2LDP will need to ensure that it is monitoring the position with the SDP and that it ensures, as far as is practicable, that it is in general conformity with it.

### **Conclusion**

- 2.75 Whilst there have been significant changes since the adoption of the LDP, the changes have not directly affected the existing policy framework and consequently there is no requirement to review the LDP arising from the policy based changes.
- 2.76 The Well-being Act has made radical changes to how local authorities, and the public sector as whole, act, interact and deliver their services. However, the changes are generally procedurally based and, as a result, are not retrospective. Consequently the Well-being Act does not directly impact on LDP policy, only affecting the processes for implementing it.

2.77 However, whilst it is noted that the need to review the LDP does not arise from the changes, the situation has changed significantly since the LDP was adopted and these changes will need to be taken into account and addressed through the LDP Review process.

## 2. Annual Monitoring

- 3.1 It is a statutory requirement for all local planning authorities to monitor the delivery of their LDP through annual monitoring reports (AMR). The main aim of the AMR is to assess the extent to which the Strategy and Strategy Policies of the LDP are being achieved. It, therefore, has two primary roles; firstly to consider whether the policies identified in the monitoring process are being implemented successfully; and secondly to consider the plan as a whole against all of the information gathered to determine whether a complete or partial review of the plan is necessary.
- 3.2 In order to consider whether the strategy is being implemented successfully, the LDP strategic policies, which should deliver the strategy, are monitored by considering a number of indicators related to each policy. As the strategic policies are complex, more than one indicator is required to monitor each policy, with each indicator monitoring a specific element within the overall policy context. Some of the indicators monitor the delivery of the policy over the plan period and whether it meets its anticipated trajectory and others monitor how far a policy is being delivered from its expected norm. Where policies have deviated significantly from their expected norm and reach their trigger point, the AMR includes a consideration of whether that policy is not being delivered appropriately and whether it is sufficient to require a review of the LDP. In addition, there is also a requirement to monitor the effects that the implementation of the LDP is having on the environment under the requirements of the European Directive on the Assessment of the Effects of Certain Plans and Programmes on the Environment [SEA Directive]. This is monitored through indicators derived from the sustainability indicators set out in the Strategic Environmental Assessment/Sustainability Appraisal [SEA/SA]. The SEA/SA monitoring is also included in the AMR each year.
- 3.3 This section will consider the issues arising from the most recent AMR, which was published in October 2019 and covered the period 1 April 2018 to 31 March 2019. Note that, as outlined in paragraph 1.17 previously, the requirement to prepare a monitoring report for 2020 was waived by Welsh Government. As such the 2019 AMR remains the most up-to-date annual monitoring report for the county borough and this report will review annual monitoring on the basis of that AMR. It should be noted that the housing delivery statement that was agreed by Council in December 2020 included the same recommendations for addressing the shortfall in housing delivery that had been included in the 2019 AMR.
- 3.4 It should also be noted that at the time the 2019 AMR was prepared the changes to TAN1 and the revocation of the 5-year land supply requirement and policy had not been made and so these were the considerations for that report.

### **Strategic Policies and LDP Objectives**

- 3.5 Whilst there are 8 previous AMRs, the most recent AMR (2019) is the most relevant for the Review Report as it provides the most up to date position in respect of the Adopted LDP. It should be noted that the 2013 AMR, produced for the period 1 April 2012 – March 31 2013 concluded that, whilst the LDP Development Strategy remained sound, the need to address housing land supply and the requirement for new sites for the 21<sup>st</sup> Century Schools programme would require a change to the Adopted policy and a revision of the plan should be undertaken.
- 3.6 The revision of the Adopted Plan was commenced in 2013 and Preferred Strategy and Deposit Replacement LDP documents were published and consulted on. At the meeting of the Full Council on 19 July 2016 the Council resolved to withdraw the Replacement LDP (subject to Ministerial approval) and seek support for the early preparation of the Strategic Development Plan (SDP) for the Cardiff Capital Region. As a result the council withdrew the revision to the Adopted LDP and retained the current Adopted LDP to determine the

future use of land and building in the county borough. In doing so it is important to understand those policies that are being effective and understand which policies are not.

- 3.7 The Adopted LDP sets out 22 Strategic Policies that are intended to deliver the plan strategy and realise the plan vision. It is these policies that are monitored to determine whether the strategy is being implemented. The 2019 AMR found that, for the first time since its adoption, over half of the strategic policies are identified as not delivering as expected. Eleven of the policies have been identified as not delivering as expected but do not require interventions, whilst 2 of the policies are identified as failing to deliver and interventions are required. Table 1, below, sets out the relative performance of the Strategic Policies, whilst Appendix 1 sets out the performance of the policies and an explanation of what action is required and why.

Strategic Policy		Performance
SP1	Development in the HOVRA	
SP2	Development in the NCC	
SP3	Development in the SCC	
SP4	Settlement Strategy	
SP5	Settlement Boundaries	
SP6	Place Making	
SP7	Planning Obligations	
SP8	Minerals Safeguarding	
SP9	Waste Management	
SP10	Conservation of Natural Heritage	
SP11	Countryside Recreation	
SP12	Development of the Valleys Regional Park	
SP13	Leisure Centre in the HOVRA	
SP14	Total Housing Requirements	
SP15	Affordable Housing Target	
SP16	Managing Employment Growth	
SP17	Promoting Commercial Development	
SP18	Protection of the Strategic Leisure Network	
SP19	Transport Infrastructure Improvement	
SP20	Road Hierarchy	
SP21	Parking Standards	
SP22	Community, Leisure and Education Facilities	

  

Key	
	Policy is being met or exceeded. No intervention required.
	Policy is not delivering as anticipated but is delivering sufficiently and does not require intervention measures.
	Policy is failing to deliver as anticipated and intervention measures should be considered.

**Table 1: Policy Performance (2019 AMR)**

- 3.8 Table 1, above, identifies two Strategic Policies that are not being implemented as anticipated and are deviating to a point that intervention measures should be undertaken. The policies, SP14 - Total Housing Requirements and SP15 – Affordable Housing Target both relate to the delivery of housing to meet the needs to the projected population in 2021. These policies are failing due to an accumulation of the same factors, specifically:

- low house building rates,
- risk-averse investment, and

- very low housing land supply figures.
- 3.9 To fully consider whether the plan strategy is being implemented, consideration also needs to be given to whether the LDP Objectives are being delivered. Appendix 2 sets out the performance of the policies against the LDP Objectives. The LDP contains 24 Objectives that set out what the LDP will deliver by the end of the plan period. Appendix 2 identifies that 14 of the 24 Objectives are being delivered as anticipated, indicating that the majority of the LDP strategy is being delivered as anticipated. It then identifies 7 Objectives that are not being delivered as anticipated, but have been subject of progress towards their delivery. These Objectives do not require intervention measures as continued progress could realise their delivery by the end of the plan period.
- 3.10 Finally Appendix 2 identifies 3 Objectives that are not being delivered as anticipated. Objective 9, which addresses the delivery of housing, has been identified as not being delivered. Whilst just over 50% of the total housing requirement has been delivered to date, this is behind the anticipated rate, as only two years of the plan period remain. Furthermore, the Council does not have the required five-year housing land supply. This is a material consideration in the determination of housing applications and has resulted in a number of housing applications being allowed on appeal in locations that are contrary to the LDP.
- 3.11 Objective 17 which addresses Caerphilly's role as a commercial and employment centre and Objective 18, on providing and protecting a diverse portfolio of employment land for a variety of employment uses, have also been identified as not delivering, on the grounds of the small amount of land granted planning permission for employment use and no allocated employment sites being developed for employment use during the monitoring period.

### **General Findings of the Policy Monitoring**

- 3.12 In order to fully consider whether the LDP is being implemented appropriately, the monitoring framework for the LDP monitors progress on the delivery of the policies and also monitors factors that could indicate that the evidence base that informed the preparation of the LDP could be out-of-date and would need to be revisited, e.g. the viability evidence that informed the affordable housing targets. There are 80 indicators in the monitoring framework and together they provide an overview of the current position in respect of the LDP. The main findings of the 2019 AMR are:
- The annual house building rate in this AMR has fallen this year from 284 to 190 units (based on 2018 Joint Housing Land Availability Study figures).
  - The housing land supply figure has increased from 2.1 years to 2.3 years using the residual method, following the approval of several major housing applications. *(It should be noted that the AMR uses the data from the previous year's JHLAS, due to the fact that the JHLAS is generally agreed after the preparation of the data for the AMR Report. Therefore, the 2019 AMR uses the 2018 JHLAS information that actually covers the period 1 April 2017 to 31 March 2018. The 2019 JHLAS has recently been agreed and the housing land supply has decreased to 2.0 years. This is still well below the 5-year requirement. This figure will be reflected in the 2019 AMR)*
  - The average house price for the county borough increased by 2% from £129,928 to £132,469.
  - The annual unemployment rate decreased from 6.2% to 5.2%.
  - The number of residents in employment increased from 80,700 to 81,900.
  - A further 12 hectares of employment land was granted planning permission.

- Of the principal town centres, only Caerphilly and Risca-Pontymister have a vacancy rate of lower than 10% and both towns saw their vacancy rates decrease to the lowest levels since the LDP was adopted. Blackwood, Bargoed and Ystrad Mynach have all seen an increase in vacancy rates.
- In the three principal towns with footfall counters (Caerphilly, Blackwood, Bargoed) there has been an increase in footfall in both Caerphilly and Blackwood. However, the previous AMR year data included a period of six weeks where the footfall counters were out of action so the data is not directly comparable. The figures in Bargoed have decreased, but this is to be expected as there is now only one footfall camera within the town rather than two.
- There was a further increase in visitor numbers to countryside recreation facilities to 1.5 million visitors per annum, and customer satisfaction has increased from 75% to 85%.

### **SEA/SA Monitoring**

- 3.13 It is a statutory requirement that, as part of its preparation, the LDP is the subject SEA/SA. The SEA Directive requires that the LDP is the subject of Strategic Environmental Assessment and national legislation requires that LDPs are also subject of Sustainability Appraisal. As well as requiring SEA assessment of the LDP during its preparation, the SEA Directive also requires that the effects of the implementation of the plan on the environment be monitored annually, and it is incorporated into the AMR Report.
- 3.14 SEA monitoring is different to the LDP monitoring as it monitors the state of the environment rather than the performance of the LDP. The state of the environment is affected by many things, only some of which are within the remit of the LDP. Consequently when preparing the LDP the SEA/SA scopes out the state of the environment to identify relevant issues. These issues are then narrowed down to a series of indicators which provide information on the issues that have been identified and 25 sustainability objectives, setting out the target to be reached by the end date of the LDP, are identified. The indicators are used to assess the LDP, whilst the Sustainability Objectives are the basis for the monitoring of the state of the environment over the plan period.
- 3.15 Whilst the SEA monitoring is undertaken each year, the indicators are considered against their respective targets and whether progress is being made to achieve them. Therefore, for the purposes of this report, the key consideration is how the state of the environment at the last AMR differs from that at the start of the period, as this provides the long term changes and overall trends that are occurring, rather than yearly changes which can be greatly affected by issues with the data.
- 3.16 The overall results show a balanced outcome – whilst the overall number of double negatives has increased since last year, there are now single negatives. All of the indicators that are recorded as negative this year have previously been negative in at least one other AMR report. None have been consistently negative since the start of the plan period; there has been significant variation across the years. The annual results are set out in the Table at Appendix 3.

### **Issues Arising From Annual Monitoring**

- 3.17 There are key issues that have been identified through the AMR process – the failure of the housing policies in delivering housing, including affordable housing, and the significant concerns around the future availability of land for employment to meet the needs of investors, linked to the wider regional aspirations for economic growth and prosperity.

### 3. Evidence Base

- 4.1 Underpinning the LDP is a wealth of information forming the LDP evidence base, which sets out the background position and reasons for the LDP strategy and its policy framework. The evidence base pulls information from a wide range of sources and changes in this information may not be directly reflected in the performance of the LDP. However, such changes could have fundamental implications for the policy framework and, as a result, changes to the evidence base need to be considered to determine whether they are of significance to the LDP, and the consideration of whether there is a requirements to Review the plan.
- 4.2 As the Council has resolved to undertake a full review of the LDP the whole of the evidence base will need to be reviewed and updated. Whilst the whole of the evidence base will need to be reviewed, consideration is given below to the principal issues relating to the land use topics and what needs to be done in respect of all relevant parts of the evidence base.

#### **Population and Housing**

##### **Population Projections**

- 4.3 The WG 2003-based sub-regional population and household projections were the ‘starting point’ that informed the population and household assumptions in the LDP. However, at the time of the preparation of growth scenarios PPW indicated that local authorities were able to deviate from these projections where they could justify their own policy based projections. The LDP is based on a position of moderate growth.
- 4.4 Since the LDP was prepared, a number of other sets of projections have been published by Welsh Government - 2006-based, 2008-based, 2011-based and most recently, the 2014 based population and housing projections.
- 4.5 It should be noted that the projections are trend based so do not make allowances for the effects of local or central government policies or socio-economic factors on future population levels, distribution and change or household composition and only indicate what may happen in future should the trend-based assumptions become true.
- 4.6 In respect of the 2011-based projections, the then Minister for Housing and Regeneration wrote to local authorities highlighting the need for caution in the use of the projections, particularly as the trend based nature of them would include assumptions based on the previous five year trends. Welsh Government has confirmed that the principles of this letter is still relevant for the 2014-based projections, highlighting that the housing requirements in the LDP must be based on all sources of evidence rather than relying solely on the projections.
- 4.7 The 2014 population projections show a low level of growth in the period up to 2030, before the population begins to decline. The population growth is projected to be due to natural change, with a negative level of migration (more international and internal migrants expected to move out than in). Furthermore, the projections indicate that there will be a significant increase in the number of people who are aged 65 and over. Conversely, the economically active population and population aged 15 and under are both projected to decrease.
- 4.8 The projections show a declining population with a significant decrease in working age population. This is significantly different from the population projections used to inform the LDP. Any review of the LDP will need to consider and address these issues
- 4.9 Since the LDP was adopted, Planning Policy Wales (PPW) has been subject to several revisions with respect to Population and Housing. PPW recognises that the household

projections are based on population projections. From the projections perspective, the emphasis has changed from the housing projections forming the "starting point for assessing housing requirements" to "forming a fundamental part of the plan's evidence together with other key issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations, the provisions of corporate strategies and the deliverability of the plan." Any review of the LDP will need to consider a range of factors in determining the level of future growth.

- 4.10 Two key elements of the evidence base that underpin the housing topic are the Local Housing Market Assessment and the Gypsy and Traveller Accommodation Assessment. Both of these assessments will need to be refreshed to provide up to date and robust evidence for the LDP Review.

### **Affordable Housing Targets**

- 4.11 The affordable housing policies in the LDP were informed by an Affordable Housing Viability Assessment [AHVA], which tested notional 1 hectare sites in a number of market areas and made assumptions about: the mix of houses, type of affordable housing, sales values, development costs, developer profit and land values. Two of the key elements in this assessment were land values, which are a cost to development viability, and house prices, which are revenue for development viability. Changes in these two values can have very significant implications for development viability and for the level of affordable housing that can be achieved through the planning system.
- 4.12 Land values are historically difficult to monitor, as the purchase values for land are not disclosed and are variable due to a large number of factors. As a result the monitoring framework does not include indicators related to land values. House prices, on the other hand, are known and published and the monitoring framework includes an indicator on house prices. Interestingly house prices have increased significantly to the point that the Indicator triggered for the first time in the 2017 AMR. In order to ensure that the affordable housing target was reasonable, the AVHA was the subject of sensitivity testing, which determined the effects of fluctuations in the assumptions that underpin the assessment. The sensitivity testing included a change in house prices and the trigger for this indicator was set at the ends of the sensitivity testing, where changes to house prices did not undermine the target. The fact that this indicator has triggered at the high end of the scale means that increases in house prices have occurred that could undermine the affordable housing target (i.e. in some areas the amount of affordable housing that it would be viable to deliver could be higher than the targets in the plan). However, it must be noted that there are many other factors that could mitigate against the rise in house prices, meaning that the target is still appropriate.
- 4.13 The Affordable housing target, along with its supporting viability evidence, will need to be reviewed and re-assessed as part of any review of the LDP.

### **The Regionalisation Agenda**

#### Regional Issues

- 4.14 Given that the WG projections are only part of the evidence base, and are not intended to determine growth levels, or even a spatial distribution of growth, there is scope for a regional context that would set overarching parameters that, cumulatively, local plans would need to realise. This would allow the strategic level to consider the regional spatial distribution of growth, which would reinforce both City Deal and the Valleys Taskforce aspirations.
- 4.15 PPW advises that "Local Housing Market Assessments provide the evidence base supporting policies to deliver affordable housing through the land use planning system". Guidance on producing local housing market assessments requires that consideration for housing issues should be based on the broad housing areas, rather than local authority

administrative boundaries. Housing markets are not restricted to local authority boundaries and cover large areas, often located within two or more authorities.

- 4.16 Acting on a regional scale would assist in the consideration of the housing markets across the CCR which could result in a more homogenous system of affordable housing targets across the region. Such consideration, however, could be undermined by local Community Infrastructure Levy charges that could drastically affect site viability between local authority areas within the same housing market area, unless CIL was also regionalised. This would be unlikely, however, as not all councils have moved to adopt Charging Schedules for CIL and it would be unlikely that those authorities would move to a regional CIL now.

### Joint Working

- 4.17 Currently the population and housing projections that underpin the adopted plans are based on local assumptions that are influenced by local circumstances and the aspirations of different administrations. Whilst joint working across local authorities is possible, there are significant issues of compatibility of objectives and aims between authorities that could render such work problematic, especially where authorities have differing views of the level of growth that should be accommodated.
- 4.18 The position is similar in respect of housing. Whilst housing market areas do extend across local authority boundaries, they are not reflective of them. As a result whilst adjoining authorities may share some housing market areas, they also share others with other authorities. A joint approach can only partially address the issue of cross border issues.

## **Employment**

### **Employment Development**

- 4.19 The LDP allocates 101.9 hectares of land for employment uses of which 25.7 hectares have been developed for employment purposes. Whilst only 25.5% of the allocated land has been developed, Oakdale Plateau 1 continues to be the focus of interest for potential occupiers and Ty Du in Nelson has recently been granted planning consent for mixed-use development and is expected to commence on-site in early 2020.
- 4.20 The adopted LDP allocates three sites in the Caerphilly Basin. To date, one of these sites has been built out (Western Industrial Estate) and a further site (Caerphilly Business Park) has been partially developed. The land available for new employment development within the Caerphilly Basin is, therefore, very limited. Whilst there are opportunities for redevelopment on existing industrial estates, the lack of any significant sites for employment growth is a concern from a strategic perspective, due to the identification of Caerphilly and Ystrad Mynach, as a 'strategic hub' by the Ministerial Taskforce for the South Wales Valleys.
- 4.21 Employment land does remain in other parts of the County Borough, including at Oakdale Plateaux 1, 2 and 4, Heads of the Valleys, Hawtin Park North, Duffryn South and Trecenydd. There is also land for smaller scale development and redevelopment within existing industrial estates. However, in light of the developments that have taken place during the plan period to date, the diversity and range of allocated sites that remain are limited and it would be timely to reconsider whether these continue to meet the needs of the business community. The decrease in permissions for B1/B2/B8 employment this year, together with the low rates of delivery over the past three years, raises concerns that there is no longer the range and diversity of sites to meet future needs. This is critical in respect of regional aspirations, where City Deal strives to deliver 25,000 jobs in the region; the allocation of land is needed to facilitate this.
- 4.22 Key elements of the evidence base in respect of employment are a larger than local assessment of the economic market and an assessment of existing employment land and

forecasts of future employment land requirements. Both of these will need to be revisited as part of the LDP Review.

### **Economic Structure**

- 4.23 By comparison to the CCR and Wales as a whole, the county borough has a relatively low proportion of its residents employed in managerial and senior professional occupations. Conversely a higher proportion of the residents in the county borough are employed in mid-level jobs.
- 4.24 Thirty percent of the county borough's workforce is employed in the public sector (public administration, education and health) which is lower than the rate for South East Wales. Manufacturing, on the other hand, employs 22.9% of the workforce, which is over double the rate for South East Wales. The county borough has particularly strong manufacturing sub-sectors, namely food, plastics and paper products.
- 4.25 Any review of the LDP will need to reflect the economic structure when identifying and allocating sustainable employment sites for future economic growth.

### **Commuting**

- 4.26 Caerphilly county borough has one of the highest out-commuting rates in Wales with just under 41,000 trips for employment outside of the county borough, most of which use the car as their mode of travel. Monitoring data identifies an overall trend of increasing levels of out-commuting, with out-commuting exceeding 50% of total residents travel to work in the 2016, 2017 and 2019 AMRs. There is also a significant in-commute every day, the 2019 AMR figure being 17,400 trips into the county borough from other authorities.
- 4.27 The level of commuting, and the fact that the vast majority uses the car, has major implications for the county borough's strategic road network. Caerphilly Basin is quickly approaching severe congestion and potential gridlock, whilst the Mid-Valley strategic routes suffers delays and increasing congestion through Maesycwmmmer.
- 4.28 From an employment perspective a key factor influencing the need to travel outside of the county borough, is the number of jobs available for the economically active resident population. The 2019 AMR identifies the job density (number of jobs per head of economically active population) of just 0.56, effectively just over one job per 2 people. This shortage in jobs requires the county borough's economically active to travel outside the county borough for employment.
- 4.29 It should be noted, however, that the job density for the county borough has been rising since its low of 0.47 in 2003, indicating that the position is slowly being rectified. However, further increases will be required to assist in alleviating the issues of commuting traffic within and outside the county borough. Any review of the plan will need to consider increasing the employment land provision in the county borough through the allocation of attractive and viable sites that can be delivered during the plan period.

### **The Regionalisation Agenda**

#### Regional Issues

- 4.30 Planning Policy Wales advises "*Effective planning for the economy requires local planning authorities to work strategically and co-operatively steering development and investment to the most efficient and most sustainable locations, regardless of which local authority area they are in.*", whilst TAN 23 – Economic Development advises "*Local planning authorities are encouraged, therefore, to work jointly in regional groups, which ideally already exist, to prepare regional economy evidence bases, including an analysis of the dynamics of the regional commercial and industrial property market, followed by an economic strategy*". Both of these references indicate that a more regional approach to considering future economic development needs to be adopted in future plan preparation.

- 4.31 TAN 23 also requires that local authorities undertake a study that considers “*individual local planning authorities’ position in the region and nationally and also include high level data on non B class uses falling within other employment categories to ensure a picture of the whole economy is presented*”. This requires LDP strategies to reflect the regional economic pattern and to establish policies that have regard to it. Given this, there is already a regional requirement for economic development.

### Joint Working

- 4.32 In keeping with the “larger than local” approach to planning for economic development put in place by TAN 23, SEWSPG has established a methodology for the undertaking of employment land reviews across South East Wales, ensuring a common approach to employment surveys. This will enable a regional evidence base to be established with employment sites assessed and evaluated in accordance with a single set of parameters, which will have clear advantages from the point of view of preparing a SDP. However, there are differing levels of resources across the ten LPAs, both in terms of staffing levels and expertise in undertaking such work (some have not, to date, undertaken employment surveys), and this will have implications in terms of establishing a single evidence base and in terms of employment forecasting for the region, especially bearing in mind the requirements of PPW 10 which stipulates that reviews include assessments of anticipated employment change by sector and land use, and targets on land provision for employment uses showing net change by sector.
- 4.33 Caerphilly, in conjunction with Monmouthshire, Newport, Torfaen and Blaenau Gwent, have jointly procured a larger than local economic review, which will provide the basis for the wider economic analysis for the LDP review.

## **Transport**

### **The Strategic Highway Network and Congestion**

- 4.34 The Transport Background Paper to the LDP states that “. . . *without legislative intervention or the introduction of fiscal measures, car travel will continue to be the dominant transport mode for the majority of people who live and work within the county borough*”. This remains true. Following a slight reduction in traffic between 2010 and 2013, traffic levels have again continued an upward trend, resulting in increasing congestion levels and congestion continues to be the principal transport issue for the development plan. In order to appropriately plan for future transport needs it is important that there is a thorough understanding of the current position and where interventions are required.
- 4.35 In order to effectively plan for the future a more robust evidence base is required. Whilst Planning applications deliver localised transport assessments, which provide useful information to feed into the strategic picture, a fuller and better understanding of the strategic network and its linkages is important to inform any future plan.

### **Air Quality**

- 4.36 One of the main implications arising from increasing traffic and congestion is worsening air quality. The County Borough already has two Air Quality Management Areas (AQMA) and increasing traffic and congestion is likely to increase the number of areas that exceed minimum air quality standards.
- 4.37 Whilst Action Plans for both of the AQMAs have been produced and are being implemented, general measures to address traffic management and measures to seek the reduction in vehicular traffic also need to be pursued to realise the required improvement in air quality generally. Increased use of public transport and active travel are important measures, but so are traffic management schemes that seek to address traffic movements where they are giving rise to air quality issues.

### **Rail**

- 4.38 Responsibility for rail transport is vested with WG (Transport for Wales [TfW]) and the new rail franchise operator Keolis-Amey. As part of the City Deal and Metro further expansion of the rail transport system is proposed... It should be noted that the improvements to the rail service in the county borough will increase capacity and service levels, but this increase is not sufficient in itself to address the congestion and commuting issues facing the county borough and other measures will also be required to deliver meaningful change.

### **Bus**

- 4.39 Local authorities are an important element in the delivery of bus services throughout the region, being responsible for administering subsidies to routes to aid viability. There is a need to increase connectivity between bus and rail services, improve linkages between them and provide a more comprehensive and integrated transport system and this will need to be reflected through any new development plan.

### **Active Travel**

- 4.40 The Council has published its Active Travel Integrated Network Map, which sets out existing and proposed active travel routes. The Council is continuing to work on delivering the proposed active travel routes.
- 4.41 Moving forward active travel will form a key element of the transport infrastructure. Whilst strategic rail and bus transport will provide transport for distances, there are many journeys that do not end at the rail or bust stop. The most effective mode of transport for these trips is via active travel. Moving forward any new plan will need to consider how to provide active travel opportunities to continue bus and rail journeys to their ultimate destination.

## **The Regionalisation Agenda**

### Regional Issues

- 4.42 Transport at a regional level will be considered through City Deal and the Metro, through the Regional Transport Body that will be set up to facilitate it. It will be necessary to integrate bus and active travel modes into the regional transport system to ensure that the objectives for City Deal are delivered.

### Regional Working

- 4.43 The South East Wales Region has a history of joint working, through regional officer groups to the former SEWTA regional transport body. When SEWTA was wound up in 2014 Regional Transport Plans were dropped and Local Transport Plans brought in to replace them. In response to this the Council, in conjunction with Blaenau Gwent, Merthyr Tydfil, Rhondda Cynon Taf and Torfaen Borough Councils, jointly prepared and published the South East Wales Valleys Local Transport Plan, which sets out the transport plan for each of the contributing authority areas.
- 4.44 Further to this the 10 authorities comprising the Cardiff Capital Region have agreed to work jointly in delivering the Metro through a regional body.

## **Natural Heritage**

### **Biodiversity**

- 4.45 There is a Biodiversity Duty that requires local authorities to protect and enhance biodiversity as part of their decisions. This is a key driver for sustainable development and well-being and as such will need to be at the heart of any plan revision.
- 4.46 There is a defined hierarchy of nature conservation protection sites, with European designations being most protected, followed by national designations with local designations given the least stringent protection.

4.47 Aberbargoed Grasslands Special Area for Conservation [SAC] is the county borough's only designated European site of nature conservation importance. There are 13 nationally designated Sites of Special Scientific Interest [SSSI] within the county borough; 8 of these are designated on nature conservation interest and 5 on their geological interest. Both the European and national sites are defined and identified outside of the remit of the development plan and therefore have no evidence base implications for the plan review.

4.48 The LDP identifies and allocates 190 Sites of Importance for Nature Conservation [SINC]. SINCs are identified and given their protection through the adoption of the LDP... Given that SINCs are the least protected sites in the protection hierarchy, they are at risk from agricultural operations and from proposed development. Consequently, SINCs can easily be adversely affected and fall below the requirements for designation over the plan period. Similarly some sites can continue to improve as habitats and become eligible for designation over time. A review of the status and quality of sites will need to be undertaken to inform any review of the plan.

### **Landscape**

4.49 The LDP allocates 6 Special Landscape Areas [SLA], which seek to protect important landscapes from damage from development. These designations were evidenced using Landmap as the basis for the designations that remains valid today. A review of the LDP may require changes to existing settlement boundaries and consequential changes to SLAs may be required. Any changes will be minor and at the edges of the SLAs. .

4.50 The LDP also allocates 4 Visually Important Local Landscapes [VILL], which are important for their aesthetic landscape value. A review of the LDP may require changes to existing settlement boundaries and consequential changes to VILLs may be required.

4.51 The council are in the process of preparing a Landscape Strategy for the county borough and this will feed into any revision of the LDP.

### **Green Infrastructure**

4.52 The Council is in the process of preparing its Green Infrastructure Strategy that will address the issues of Green Infrastructure. In addition consideration will also need to be given to the issue of green wedges and the potential for coalescence of settlements. Both of these will feed into any revision of the LDP

### **Geology & Geomorphology**

4.53 Caerphilly County Borough has five sites that qualify for protection as a Regionally Important Geological Site [RIGS]. However these sites are not specifically designated as RIGS as they are also nationally designated as SSSIs, which carries greater protection than the RIGS designation would. Given the hierarchical nature of the protection designations, the higher SSSI designation provides greater protection than the RIGS designation would, so the SSSI designation is retained for these sites. This position has not changed and will not need to be revisited as part of any review.

### **The Regionalisation Agenda**

#### Regional Issues

4.54 Since natural heritage issues are not defined by administrative boundaries they should be addressed strategically, through consultation and collaboration with adjoining planning authorities.

4.55 The Valleys Regional Park (VRP) concept drives and promotes activities related to the environment and heritage and associated tourism activities across the South Wales Valleys. Its activities are already delivered through a strategic cross-boundary collaborative and regional approach. In addition to a funded package of enhancements the VRP supports design principles that help protect the natural heritage of the Valleys, increase its resilience and improve usage.

#### Joint Working

- 4.56 A report has been carried out looking at future options for the next phase of the VRP and this will be of major importance across the CCR in respect of natural heritage matters.
- 4.57 In terms of natural heritage, there is a history of joint working, through both regional and national officer groups. Regionally, the continued designation of biodiversity and midscape sites is required, however, standard criteria is required for such designations. Green Infrastructure policies should be considered at regional level and key local green network features, and particularly linkages, should be maintained and enhanced throughout the region.

### **Retailing**

- 4.58 The Shopper Attitude Survey (SAS) is undertaken to establish: where and how often residents are shopping for their food (convenience) and non-food purchases (comparison / bulky comparison); reasons for visiting centres; their attitude towards the centres and means of transport used'. The survey includes both a telephone survey and an on-street survey. (Caerphilly county borough is split into 6 retail catchment areas defined by fitting census small area boundaries to 20 minute drive time isochrones for each centre). The survey sample includes postcode areas from within each of the 6 catchment areas across the county borough in order to be capable of producing residents' behaviour patterns by individual settlements.
- 4.59 In Caerphilly County Borough the data from the SAS in addition to population and expenditure data purchased from Experian (industry standard that consultants also use) is used to carry out all the retail calculations in respect of retail capacity. The Shopper Attitude Survey and retail analysis will need to be revisited as part of the LDP Review.
- 4.60 Retail and Commercial Centres are increasingly becoming 'hubs' for investment with funding forthcoming from City Deal and the Metro as well as being identified as locations for investment by the Valleys Taskforce. The nature of town centres is changing, with their increasing prominence as service centres, economic development hubs and major employers and to a lesser extent retail. The future vitality and viability of town centres is very much dependent upon their ability to adapt and to serve the needs of their immediate catchment.
- 4.61 There is scope across the region to work jointly together to establish regional evidence and align local evidence gathering methodologies. In recognition of this, a decision was made by SEWSPG to undertake work relating to specific topic areas that would underpin the evidence base of any 'new' emerging plan. A Retail Task and Finish Group was established at the request of SEWSPG. The purpose of this group was for practitioners to:
- Identify best practice;
  - Align an LDP evidence base as it relates to retail across the 10 Local Planning Authority Areas;
  - Establish a common methodology for each LPA to use in undertaking annual retail monitoring to determine current retail provision ;
  - Propose a methodology for undertaking a regional retail capacity study;
  - Identify the potential for collaborative working;
  - Highlight the resource implications of all of the above.
- 4.62 The first retail paper that proposed a standardised methodology for surveying existing retail provision was agreed by SEWSPG in May 2017. The second retail paper intended to devise a methodology to undertake a Retail Capacity Assessment for the region and the resource implications and potential cost savings in undertaking this work collaboratively is

yet to be reported but could have implications for work in respect of the retail evidence base.

### **The Regionalisation Agenda**

#### Regional Issues

- 4.63 Leaders within the CCR have committed to producing a SDP for the region in order to drive growth in appropriate locations and to provide the critical mass necessary to support a strong and diverse economy. Whilst the scope of the SDP is yet to be determined there is a strong likelihood that this will include defining a Retail Hierarchy for the region.

#### Joint Working

- 4.64 Whilst a common methodology has been agreed by SEWSPG partners for monitoring existing retail provision and aligning the retail evidence base across the CCR, further work needs to be progressed in respect of undertaking retail capacity assessments and the merits of undertaking this work collaboratively.

### **Leisure**

- 4.65 Welsh Government requires local authorities to create a framework for allocating adequate land for provision of sport, recreation and leisure facilities. This can only be reasonably achieved by undertaking local assessments of need and audits of existing provision.

- 4.66 PPW recognises the Fields in Trust Standards [FIT Standards], which were introduced to replace the National Playing Fields Association [NPFA] six acres standard, as a useful benchmark for assessing the need for sports and recreational provision. A Play sufficiency assessment was undertaken in 2013 to inform the now withdrawn Replacement LDP, however there have been changes in the interim period that will require this assessment to be updated.

#### **Natural Green Space**

- 4.67 The former Countryside Council for Wales (now part of Natural Resources Wales) developed the “Greenspace Toolkit” that sets targets for access to green space for set distances from a person’s home.
- 4.68 The Council, in conjunction with 4 other authorities, undertook an assessment of the county borough that identified that the county borough was well provided with larger green spaces at distance, reflecting the large area of open uplands and common above the linear settlements along the valley floor, with less provision at the shortest distances, particularly provision within 400m. This position still remains and it is unlikely that further assessment is warranted.

#### **Open Space and Outdoor Recreation and Leisure**

- 4.69 A review of outdoor recreation and an audit of open space were undertaken as part of the preparatory work for the now withdrawn Replacement LDP. Both assessments identified areas where provision was needed and where protection of facilities were heightened due to under provision. The Council approved its Sports and Active Recreation Strategy in November 2018. Any revision of the LDP will need to take account of this Strategy.

### **The Regionalisation Agenda**

#### Regional Issues

- 4.70 All LDPs contain policies for the provision and protection of open space and recreation within their areas. Whilst there is some discrepancy in the background evidence that has been used to reach targets, generally, the FIT standards are used.
- 4.71 Some LPA’s have used consultants and have looked at both public and private leisure provisions within their respective LDPs, as well as incorporating Leisure facilities into their Retail studies as the two subjects can overlap.

### Joint Working

- 4.72 Whilst there is some collaborative working to plan for the delivery of sport and physical activity, generally, leisure issues such as play parks, skate parks and sporting facilities are localised to communities rather than large areas of population.
- 4.73 However, larger leisure activities such as leisure centres, cinemas and golf clubs have a much bigger impact that reach beyond local authority boundaries. Leisure Centres are the council's only commercial leisure provision, although the council also owns and operates tourism attractions, such as BMI, Llancaiach Fawr and Country Parks, that also operate on a commercial basis. Other larger leisure activities tend to be provided by the private sector.

### Community Facilities

- 4.74 Community Facilities cover a wide range of services, some of which are delivered by the Council, whilst others are provided by either other public bodies (e.g. Aneurin Bevan Health Board) or by the private sector/third parties. As a result the evidence underpinning the community facilities element of the LDP is heavily reliant upon input from other bodies and organisations.
- 4.75 Whilst the Council monitors the delivery of its provision of community facilities, changes in the need and provision of those facilities not provided by the Council will need to be identified by the respective provider having regard for the planned level of population and household growth. As a result it will be necessary to update the evidence in respect of those elements of the community facilities provision.

### **The Regionalisation Agenda**

#### Regional Issues & Joint Working

- 4.76 The Well-being of Future Generations Act requires public bodies in Wales to think about the long-term impact of their decisions, to work better with people, communities and each other, and to prevent persistent problems such as poverty, health inequalities and climate change. Most importantly the Act requires that all public bodies work together to deliver services, rather than individually and in isolation. To deliver this change each local authority within the CCR is required to establish a Public Service Board to oversee the integrated delivery of services across the public sector. Each PSB is a separate entity and the legislation does not require them to work together. However they do work together on mutually relevant issues. Most PSB partner organisations, apart from the local authorities, cover a footprint wider than a single PSB area and this encourages joint working. In Gwent the 5 local authorities and their PSB partners work jointly through the Gwent Well-being Assessment Group (GSWAG), and partners across the whole Cardiff Capital Region City Deal work together on joint initiatives related to that strategic programme of work.

### Waste

- 4.77 Planning for waste management is performed on a regional basis in Wales, with the preparation of Regional Waste Plans and the procurement of major new waste facilities being achieved through regional consortia. A significant implication of the regional approach to waste management provision is that the requirements of an individual local authority can be met within another local authority's area, or through a combination of facilities throughout the region.
- 4.78 The planning system has a role in implementing the revised EU Waste Framework Directive [rWFD] that aims to prevent and reduce the impacts of the generation and management of waste, whilst improving the efficiency and use of resources. Article 28 of rWFD requires member states to prepare waste management plans, fulfilled by PPW and TAN 21 Waste, and article 16 requires the establishment of a network of waste management facilities to address the recycling and disposal and use of waste.

- 4.79 PPW 10 sets out the role that the circular economy has to play in the reduction of waste and its importance in the waste hierarchy. The LDP review will need to address the issue of waste minimisation and the role of the circular economy in addition to setting out the waste management requirements for the county borough.
- 4.80 As part of facilitating the provision of sustainable waste management, the identification of suitable locations for such development should be considered as part of plan preparation, recognising that the most appropriate locations will be those with the least adverse impact on the local population and the environment and with the best potential to contribute to a broad infrastructure framework. TAN 21 Waste provides further guidance in respect of addressing waste issues through development plans.

### **The Regionalisation Agenda**

#### Regional Issues

- 4.81 As outlined above waste management is already addressed on a regional basis through regional consortia.

#### Joint Working

- 4.82 Given that waste management is addressed through regional consortia means that each local authority is already working jointly with the others within its region.

### **Renewable Energy**

- 4.83 In 2011, the Council completed a 'Renewable Energy Baseline Assessment' (REBA), which examined the potential within the county borough to generate renewable energy. In accordance with National Guidance, the authority has updated its Renewable Energy Baseline Assessment (REBA) in 2015 following the approach set out in 'Renewable Energy: A toolkit for Planners'. The 2015 Assessment identifies:
- The current renewable energy capacity within the County Borough; and
  - The future potential to harness renewable energy within Caerphilly County Borough Council;
- 4.84 The assessment concentrated on the following renewable energy technologies:
- Onshore Wind;
  - Biomass;
  - Energy from Waste;
  - Landfill Gas;
  - Anaerobic Digestion (animal and food);
  - Hydro power;
  - Building Integrated Renewables (BIR); and
  - Solar Farms.
- 4.85 The updated 2015 REBA study identifies the following as potential opportunities within Caerphilly:
- **Wind energy**, however cumulative visual impact is likely to limit the exploitation of this resource. Detailed feasibility work of specific sites would be required to confirm the viability of specific sites.
  - **Solar PV**, both building integrated and ground based. Further survey work would be required to identify viable projects as well as a landscape sensitivity and capacity study. Again, the cumulative impact is likely to limit the exploration of this resource.

- There are potential opportunities for heat networks in respect of proposed larger development sites across the County Borough.

- 4.86 As part of regional work undertaken for assessing the requirements of Wind Turbine developments across the County Borough, Gillespies LLP were commissioned to carry out a landscape sensitivity and capacity study for the county borough. This document highlights the various typologies of wind turbines, against the assessments within LANDMAP and against known constraints. The guidance does not however consider the environmental impact of development. The guidance also sets out the minimum requirements and standards of information to be submitted with a landscape and visual impact assessment (LVIA). The guidance has been adopted as Supplementary Planning Guidance to the LDP.
- 4.87 On 4<sup>th</sup> June 2019 Caerphilly County Borough Council formally declared a climate emergency as a Notice of Motion and as a result of this, the Council has committed to becoming net zero carbon by 2030. Following engagement with residents and key stakeholders, officers are in the process of developing a 'Net Zero Carbon Plan' which will focus on four broad categories being Reduce, Produce, Offset and Buy. The Net Zero Carbon Plan will also include a detailed action plan to enable the Authority to achieve the 2030 target.
- 4.88 The evidence base for renewable energy will need to be updated and consideration will also need to be given to the Draft NDF, which identifies Priority Areas for renewable energy and sets out the national policy for renewable energy generation

### **The Regionalisation Agenda**

#### Regional Issues

- 4.89 Regionally the vast majority of authorities have undertaken a REBA study, as required by Welsh Government in their toolkit. Whilst there is a strong desire to include renewable energy policies in LDPs and to not hinder their development through generic renewable energy policies, the designation of Strategic Search Areas has focussed such provision. However there are no Strategic Search Areas within Caerphilly and this may have a negative effect in scheme being progressed. The Draft NDF has proposed Priority Areas for onshore wind and solar energy generation that include areas within the county borough. The SDP for the region will need to take account of these as part of any regional policy strategy for renewable energy generation.

#### Joint Working

- 4.90 Welsh Government has set targets for the generation of renewable energy. Planning Policy Wales: Edition 10 requires local authorities to identify targets for renewable energy in their development plans. However, renewable energy targets would be better addressed at a regional level.
- 4.91 In producing a regional evidence base, as there is a need for LPA's to translate findings onto a map, regional working would help solidify the locations of where renewable energy generation would take place.
- 4.92 Whilst there is a general consensus across all LPA's for the need to increase renewable energy generation through appropriate proposals and allocations, it would require the identification of strategic search areas across the region. A regional evidence base that is well established and has regional buy in would assist in securing sites that may be of contention.

#### Minerals

- 4.93 Energy minerals have largely been considered through Local Development Plans, prepared in accordance with national guidance. Aggregates, on the other hand, have been

considered regionally since the early 1970s, when the Regional Aggregates Working Parties (RAWP) were set up to advise the government on aggregates demand and supply issues. The South Wales Regional Aggregates Working Party (SWRAWP) covers the whole of South Wales, including Caerphilly County Borough. The SWRAWP undertakes an annual survey of aggregate sales and reserves, and produce the Regional Technical Statement, which sets out how aggregates demand will be met over the next 15 years, although this is reviewed every 5 years.

- 4.94 During the preparation of the LDP minerals activity was high, as a result of the buoyant economic climate. This was reflected in all future projected need for both energy minerals and aggregates, which formed the basis for the preparation of the minerals policies contained within the LDP. Whilst the Adopted LDP proposed no energy mineral requirements, the annual projected production for aggregates was around 800,000 tonnes per year. Since the first AMR Report Policy SP8 Minerals Safeguarding has consistently realised its trigger point because annual minerals production had fallen to just over 400,000 tonnes per year. However, the SWRAWP annual surveys identified that demand for aggregates had dropped significantly and that is why aggregate production also fell, as aggregates are only worked where a demand exists for them. The SWRAWP annual surveys also identified that the demand for aggregates across South East Wales was being met. As a consequence the level of production has fallen throughout the plan period for the LDP but this is a direct reflection of falling demand, which is otherwise being catered for.

### **The Regionalisation Agenda**

#### Regional Issues

- 4.95 Regional issues are addressed through the RAWP and the second Regional Technical Statement was subject of public consultation from September to November 2019. The LDP Review will need to take account of this.

#### Joint Working

- 4.96 As outlined above, local authorities, along with other stakeholders, are already working jointly and progressively through the RAWP.

### **Covid 19 and Brexit**

- 4.97 Whilst these two issues are not currently part of the evidence base, they both have the potential for very significant economic and social impacts that would have implications for all policy areas. In accounting for these issues, the main problem stems from a lack of evidence and information to substantiate the extent and nature of the impacts that these issues will have. It is highly likely that the information surrounding these issues will increase during plan preparation. However there is also likely to be significant wealth of short-term trends and actions that seek to address the immediate issues, but the emerging plan will need to take a long term view of the position and resist the potential to be drawn by short term trends.

### **What Changes Are Required to the LDP?**

- 4.98 The Adopted LDP was adopted in November 2010 and, as such, the policy framework and evidence base in support of the framework are 10 years old. Whilst the Replacement LDP was progressed to Deposit stage, neither the evidence supporting this plan nor the policy framework it proposed were the subject of scrutiny through an Examination. The withdrawal of the Replacement LDP means that, whilst the evidence base was updated, the policy framework is still dated and any future revision of the Adopted LDP will require a fundamental reconsideration of all aspects of policy. This is necessary because:
- The national policy framework within Wales has changed significantly since the Adoption of the LDP in 2010 which have introduced a number of new and additional requirements to plan preparation;

- The Well-being Act has introduced a new way of working for public bodies and this needs to be embodied in any review of the LDP;
- The requirement to deliver sustainable development will need to be at the heart of the any review of the plan in accordance with the Well-being Act
- The increased pressure for joint working will impact upon how the evidence base is updated and will include more larger than local authority-wide assessments;
- The Environment Act sets out a biodiversity duty for local authorities that must be considered throughout the LDP. This will be underpinned by Area Statements that are required to be prepared by NRW.”
- The demography of the previous plan is based on Census figures that are 20 years old. Any review of the plan will require significant updating of these figures, which are at the heart of any development plan;
- The economic circumstances have changed dramatically from the period when the plan was adopted. Any review of the LDP will need to take account of the current and future economic environment;
- Leaving the European Union. Any review of the LDP will need to take account of the potential impacts of Brexit, not least the impacts that this will have on land use planning, specifically: migration, rural diversification and on funding streams that development proposals could be reliant upon;
- Any review will need to take account of the regionalisation agenda, in particular:
  - The implications and opportunities arising from City Deal, The Metro and the Valleys Task Force.
  - The implications arising from the preparation of a Strategic Development Plan for the Cardiff Capital Region.

4.99 Given the above, **ALL** of the content of the LDP will need to be reconsidered due to changes in circumstances and policy requirements that have occurred since the adoption of the LDP in 2010. These include:

- LDP Vision, Issues and Objectives: The Vision, Issues and Objectives of the LDP were borne out of the Council’s Community Plan. However since then Community Plans have been replaced by Single Integrated Plans, which themselves have recently been replaced by Well-being Plans. As the basis used for the LDP Vision, Issues and Objectives no longer exists, then these need fundamental reconsideration as part of the LDP review.



## 4. Options and Conclusions

5.1 The previous chapters have outlined the position in respect of the LDP, how it is performing and what an evidence base for any plan review would need to consider. Moving forward it is necessary to consider a number of factors before determining what course of action is appropriate for the Council. There are three broad areas that need to be considered, which are:

- Is a Review of the Adopted Plan necessary?;
- What form of review should be undertaken?;
- The scope for joint working;

### **Is a review of the Adopted plan necessary?**

#### *The 2019 Annual Monitoring Report*

5.2 The 2019 AMR sets out the full position in respect of the current position in respect of the Adopted LDP and whether a review of the plan is required. The 2019 AMR has identified that 2 housing policies, namely: SP14 Total Housing Requirements; and SP15 Affordable Housing Target, its associated Objective (9) and two employment objectives (17 & 18) are not being delivered.

5.3 Since 2013 the housing indicators have identified that insufficient housing has been developed in the county borough. This was one of the two reasons for the commencement of a revision to the LDP in 2013, which was subsequently withdrawn. Whilst some housing proposals have been approved on appeal, this is insufficient to address the shortfall in housing. It is accepted that a review of the LDP is required to fully address this position.

5.4 Concern in respect of the Employment Objectives has been raised in the 2019 AMR. The concern revolves around the issue that the City Deal and Metro and the Valleys Taskforce have identified Caerphilly and Ystrad Mynach as a focus for regional growth and investment, whilst the employment land in both towns is severely restricted. The lack of any significant sites for employment growth is a concern from a strategic perspective, due to the identification of Caerphilly and Ystrad Mynach, as a 'strategic hub' by the Ministerial Taskforce for the South Wales Valleys.

5.5 Whilst employment land exists elsewhere in the county borough, it does not provide the platform to realise the potential of the strategic hubs at Caerphilly and Ystrad Mynach and as such, would compromise the ability to deliver the two Objectives. Given these issues the 2019 AMR concluded that a review of the LDP is required.

#### *The Position in Respect of the SDP for the Region*

5.6 When the Council resolved to withdraw the Replacement LDP in July 2016, and its subsequent ratification of the withdrawal of the plan in October 2016, it was on the basis that the Council would seek the early preparation of a SDP. As a result, whilst all AMRs since the 2013 AMR have identified that a review of the LDP was required, the resolution to pursue an early commencement of the SDP outweighed that need.

5.7 In January 2018 the Cardiff Capital Region Cabinet agreed the principle of preparing an SDP for the region and in June 2019 the Cabinet endorsed a report recommending the commencement of the SDP, which was to be presented to each of the 10 constituent local authorities for their agreement to commence the process. To date 8 of the authorities have presented the report and all 8 have accepted the recommendations. The remaining 2 authorities will present the report to their Councils early in the new year. The report was presented to Caerphilly Council on 23 October 2019 and the Council agreed the recommendations.

- 5.8 Since the Council has agreed to commence the preparation of a SDP for the region, the resolution from the 2016 decision to withdraw the Replacement LDP has now been met. As a result the resolution to pursue the early commencement of the SDP is no longer a reason not to commence a review of the LDP.
- 5.9 The enactment of the Local Government and Elections (Wales) Act in January 2021, it is now a statutory requirement that the CJC for the Cardiff Capital Region prepares an SDP for the region.

### LDP Drop Dead Date

- 5.10 One of the key issues driving the need to review the LDP is the fact that the LDP will expire on 31<sup>st</sup> December 2021 (note: 7 of the region's 10 local authorities have LDPs that expire in 2021). The effect of this is that, under the Planning Act, the LDP will not form the local development plan for the county borough after the expiry date, and there will be no plan coverage if a revision or new plan is not in place. Whilst SEWSPG and the WLGA have repeatedly campaigned for WG to relax the expiry date to allow the policy frameworks to maintain coverage whilst the SDP is prepared and adopted, WG have not amended the position.
- 5.11 As a result the LDP will cease to be in effect, and will have no weight in planning decisions, after 31 December 2021. As a result a review of the LDP is required in order for there to be plan coverage for the county borough after the drop dead date.

### Is a review of the Adopted LDP required - Conclusion

- 5.12 Given the above, the 2019 AMR concluded that a review of the LDP was required and should be commenced immediately. It should be noted that the Minister for Housing and Local Government has advised local planning authorities, who had plans adopted prior to the introduction of the Planning Act in 2015, that their plans do not expire at the end of their plan period. Rather they continue to provide a policy framework for considering development proposals. Whilst this removes one of the reasons for moving towards a review of the LDP, it does not undermine the need to undertake an immediate and full review of the LDP.

### What form of review should be undertaken?

- 5.13 There are potentially 2 forms of review that could be undertaken in respect of the plan.

### LDP Lite

- 5.14 The Planning Wales Act 2019 sets out the provisions for the preparation of Strategic Development Plans. In addition to this the Act sets out the provisions for local authorities within the area covered by an SDP to undertake a short form of LDP review termed an LDP Lite. The LDP Lite would benefit from the overarching strategy and strategic policies set out in the SDP. As a result the LDP Lite would comprise allocations and local development control policies.
- 5.15 Given the reduced content and the fact that the LDP Lite would not require the Preferred Strategy stage, due to the SDP Strategy, the LDP Lite would be quicker to prepare than a full review. However, an LDP Lite is directly related to the SDP and would therefore need to be prepared after the SDP, although it might be possible to commence the preparation of an LDP Lite when the SDP has reached a stage of relative certainty, i.e. submission for examination. Commencing preparation of an LDP Lite before the SDP is adopted runs the risk that the LDP Lite may be found not to be in conformity with the SDP if changes are made to the SDP as part of the examination process. This would require additional work to address the issue and would increase the preparation time for the LDP Lite.
- 5.16 Whilst the process for preparing the LDP Lite would be shorter, the fact that the preparation of the LDP Lite would need to be delayed until the SDP has reached an advanced stage means that the LDP Lite would, at best, be adopted in 2026, or even later if there are

delays in preparing the SDP. That would mean the county borough would be without LDP coverage for at least 5 years.

### Full LDP Review

- 5.17 By comparison a full review of the Adopted LDP would require the full process, including the Preferred Strategy stage. The full review process is more expensive and longer than the LDP Lite process and WG expects LDP Revisions to take three and half years to prepare and adopt.
- 5.18 It should be noted that care would need to be taken with the preparation of a full review of the LDP to ensure that it remains in conformity with the emerging SDP as it is progressed, albeit slightly behind the LDP. If the new Replacement LDP is not in general conformity with the adopted SDP, then a further review of the LDP would be required, albeit in the form of the LDP Lite.

### Review Form - Conclusion

- 5.19 The principal issue in respect of the form of the review is that the Adopted LDP is nearing the end of its plan period, and whilst the plan will not cease to have any weight, the fact remains that the plan would be operating outside of its plan period and there are issues that have arisen in respect of housing and employment land that need to be addressed. It is essential that these are addressed as a matter of priority and this would mean a full review is required as employment and housing land provision is at the heart of any future strategy.
- 5.20 Consequently a full review of the Adopted LDP should be undertaken.

### The Scope for Joint Working

- 5.21 It is a requirement of the Review Report that it considers the potential for:

- preparing a joint LDP with other authorities, and/or
- Working together to procure evidence for the evidence base

### Joint LDP Preparation

- 5.22 There is general support from all authorities in the CC Region for joint working towards the preparation of a SDP. However, there are a number of issues that impact on the potential for undertaking joint reviews at a local level.
- 5.23 The principle behind preparing Joint Plans is that a comprehensive and joined up approach is taken towards cross-boundary issues. This would require that the two authorities that could prepare joint plans would need to have a common boundary that would generate cross boundary issues. Whilst it is more than possible that two physically separated authorities could have related and connected issues, the fact that there would be a further authority(ies) that would not be party to the joint plan, would mean that the issues could not be addressed appropriately due to the lack of overall coverage. As a result it would be inappropriate to consider authorities without a physical boundary with the county borough for Joint Plan preparation. This would rule out Monmouthshire County Council, The Vale Of Glamorgan County Borough Council and Bridgend County Borough Council.
- 5.24 A key issue when considering the remaining 6 authorities that do share a boundary with Caerphilly, is that they are all at different stages of plan preparation. Both Newport and Cardiff City Councils have Adopted plans with plan periods that do not expire until 2026, although both are progressing reviews, albeit at different points in the preparation process to Caerphilly.
- 5.25 The remaining 5 authorities have commenced a review of their plan. However, due to the Covid restrictions and the issue of consultations they are all at slightly differing points in the process from one another. Table 2 below sets out the respective positions of each authority in their plan preparation.

## Caerphilly County Borough Local Development Plan – Review Report

Authority	Adoption	Review	Expiry	Stage of Review
Blaenau Gwent	2012	2016	2021	Delays caused by Covid restrictions, second call for candidate sites cancelled.
Bridgend	2013	2017	2021	Deposit Consultation early 2021
Caerphilly	2010	2014	2021	DA Consultation closed on 29 March 2021, to be submitted to WG early in June 2021
Cardiff	2016	2020	2026	Consultation on DA completed. Working towards Preferred Strategy stage
Merthyr	2011	2015	2021	LDP recently Adopted.
Monmouthshire	2014	2019	2021	Preferred Strategy consultation started early in 2021 although Covid restrictions are impacting upon the process.
Newport	2015	2019	2026	Consultation on DA and Review Report completed.
RCT	2011	2015	2021	DA agreed September 2020, working toward Preferred Strategy
Torfaen	2013	2017	2021	Consultation on Preferred Strategy underway.
Vale of Glamorgan	2017	2021	2026	Commencing a Review June 2021

**Table 2: Status of LDPs and current position in Respect of Review**

Whilst there was potential for Caerphilly and RCT to undertake joint plans when the Draft Review Report was written, things have changed since then and, due to the different impacts of Covid upon the authorities they are now at different points in the process. To delay on authority from continuing to allow the other to catch up and continue as joint plans would not only cause undue delay to one authority (potentially putting their delivery timetable in jeopardy) both authorities set out to prepare their own plan and as such it would be inappropriate to join them now.

- 5.26 Similarly, the other 5 authorities that border Caerphilly are at different points in the process and were prepared as stand alone documents, that would cause significant issues if they were to be aligned and prepared jointly. Given this there is no scope for the preparation of joint plans with any of the other authorities.

### Joint Working

- 5.27 Caerphilly is actively looking at working jointly with those authorities that are committed to a LDP Review. Caerphilly has worked, and are continuing to work, with other authorities on various cross border issues, such as the larger than local economic study and the renewable energy assessments. Caerphilly has worked with Monmouthshire, Newport, Torfaen, Blaenau Gwent and RCT councils in preparing evidence and as a joint procurement for a database solution for the LDP process.
- 5.28 In addition to this SEWSPG is actively looking at opportunities for collaboration across the region on a wide range of potential evidence base areas.
- 5.29 Both SEWSPG and Caerphilly will seek to maximise their use of the opportunities for joint working and collaboration as plan preparation progresses.

**Conclusion**

5.30 This Review Report concludes:

- I. In agreement with the 2019 AMR Report that a review of the Adopted LDP is required
- II. In agreement with the council resolution of 23 October 2019 that a full review of the LDP should be commended immediately
- III. It would be inappropriate to undertake a joint plan with another local authority due to the significant difference in progress on plan preparation and in respect of the issues and strategies for the review process.
- IV. That Caerphilly and SEWSPG should continue to maximise the opportunities to use joint working and collaboration in plan preparation moving forward.

**5. Next Steps and Arrangements**

The Review Report will be reported to Full Council on 1<sup>st</sup> June 2021 and, if approved will be submitted to Welsh Government as the Council's final Review Report.



## Appendix 1: Strategic Policy Performance and Actions

Please note that as a result of the waiving of the requirement to prepare a AMR for 2020, this table reflects the findings of the 2019 AMR Report

Policy	Factor	Issue	Comment	Consideration	Action Required
SP1				The policy is being delivered as anticipated	No action required
SP2	Factor 3	Out commuting as a percentage of total commuting of residents of the county borough.	The trigger point for this factor is for out-commuting to exceed 50%. This current rate is 52.7%, which is an increase of 4.7% from last year. The policy has triggered three times in the last 4 years.	The figures are taken from the Annual Population Survey, which provides information on commuting patterns by local authority in Wales. This is a sample survey subject to natural variances. This results in natural fluctuations in the results, which could explain why only 3 years out of 8 have triggered. As the previous year was below the trigger and there has been significant variation, this is not considered to be a matter that requires immediate action and should be monitored further.	No immediate action required. Will need to consider further if next year's AMR also triggers.
SP3	Factor 2	Percentage of total new housing development on Brownfield land.	Only 61% of new housing development was on brownfield land, which was below the trigger point of 88%.	There has been a decrease in the number of housing completions on brownfield sites compared to previous years. This is mainly due to the development of two greenfield sites that were allocated in the LDP. The other greenfield completions were primarily on small sites (less than 5 dwellings) that were infill sites within the	No immediate action required. Will need to consider further if next year's AMR also triggers.

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				<p>defined settlement boundary, which accords with the strategy aim of consolidating development within existing settlement boundaries.</p> <p>Whilst the policy has triggered, the fact that the greenfield sites that have been developed have been within settlement limits means that the policy itself is not failing. However, future AMRs will record completions on greenfield sites allowed on appeal.</p>	
<b>SP4</b>	Factor 1	Annual footfall in 3 of the principal town centres.	<p>Footfall has decreased in Bargoed and is below the target. Caerphilly and Blackwood have seen an increase in footfall over the last year, but Caerphilly is still below the target.</p>	<p>Bargoed has seen a decrease in footfall, but this is expected as the town now only records footfall in one location, rather than in two locations, as was previously the case. Blackwood and Caerphilly have seen an increase in footfall, but this is compared to the previous year when data was not available for 6 weeks due to a footfall monitor replacement programme.</p>	No further action required.
<b>SP4</b>	Factor 2	Vacancy Rates in the 5 principal town centres.	<p>Vacancy rates in Bargoed are over 20% for 5<sup>th</sup> consecutive year. Increased by 2.1% above last year's</p>	<p>The vacancy rate in Bargoed continues to be above 20%, increasing by 2.1% to 22.9% when compared to 2018 figures. Bargoed has been the subject of major regeneration work and has suffered due to</p>	No further action required.

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			results.	<p>the recession. However, there continues to be developer interest in the town, which may return Bargoed below the trigger point, but this may not be immediate.</p> <p>There has been a small increase in vacancy rates in both Ystrad Mynach and Blackwood over the monitoring period, although in both towns the figure is lower than 15%, so within an acceptable monitoring level.</p>	
<b>SP4</b>	Factor 3	Percentage of residents satisfied with their town centres.	Caerphilly only (5th year but no revision for 5 years). Under the trigger by 3%	Caerphilly is the only centre to trigger and this undoubtedly relates to the lack of redevelopment that has taken place in the centre due to the economic downturn. The data has not been updated for 5 years so is now outdated.	No further action required.
<b>SP4</b>	Factor 4	Percentage of money spent in County Borough retail centres as a total of total spend.	Non-Bulky goods only (5th year but 5 years since last data revision). Significantly under the trigger.	Retail spend has declined throughout the county borough in line with the recession. This position has been exacerbated by the regeneration works in Bargoed and the lack of redevelopment in Caerphilly. The data has not been updated for 5 years so is now outdated. Whilst this issue will need to be monitored closely in the future, it is not yet an issue that would require a review of the plan.	No action at the current time.

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<b>SP5</b>	Factor 1	Number of applications for urban forms of development (not defined by criterion C, Policy CW15) located outside of settlement boundaries either approved by CCBC or allowed on appeal	This is the third year that this Factor has triggered. This year, it has triggered both in relation to the number of applications approved in the monitoring year (5 applications), and on the trigger of three consecutive years where urban development outside of the settlement boundary has been approved.	<p>The number of application approved for urban forms of development outside the settlement has decreased from 20 last year to 5 this year. This includes the approval of reserved matters applications in relation to 2 major housing sites that were approved at appeal and 3 minor housing sites (single dwellings in appropriate locations).</p> <p>The change in policy stance to dis-apply the “considerable weight” applied to the lack of a 5 year land supply could change the future consideration of applications so may reduce the number of speculative out of settlement applications approved in the future and this will need to be monitored in future AMRs.</p>	No further action required. Will need to consider further if next year’s AMR also triggers.
<b>SP6</b>				The policy is being delivered as anticipated	No action required
<b>SP7</b>				The policy is being delivered as anticipated	No action required
<b>SP8</b>	Factor 2	Average yearly usage of aggregates by the construction industry (averaged across the preceding 3 years)	Triggered in every year of the monitoring, apart from where data was not available.	Minerals production is intrinsically aligned to minerals use (minerals are not produced if there is no market for them). Mineral use has reduced dramatically as a result of the economic downturn and has not yet recovered in any substantive way. As a result mineral production has	No further action required.

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				<p>dramatically reduced to reflect this. No action required.</p> <p>Given that there is not a shortfall in production over usage, the fact that the Factor triggers is not significant.</p>	
<b>SP9</b>				The policy is being delivered as anticipated	No action required
<b>SP10</b>	Factor 2	Number of approved applications that result in loss of Area of SINC/LNR to development	<p>Triggered for the fifth year in a row, but, because it is based on a 3 year cumulative trigger, it has actually failed for the past 7 years.</p> <p>The number of applications approved has fallen from 12 to 3.</p>	<p>This Factor, like many others, is based upon an absolute trigger that does not take account of the nature of the applications that are being permitted. Whilst 3 applications have recorded loss of SINC/LNR land, there is no qualification as to whether the applications actually result in any damage to this land.</p> <p>The three proposals that have been granted permission within SINC's include two single dwelling schemes – one within the curtilage of an existing dwelling, and one on the edge of a settlement, plus an industrial use. In each case, there was considered to be no harm to the SINC.</p> <p>Two of the Indicators address landscape designations, one relates to VILLs and the other relates to SLAs, neither of which have triggered this</p>	No action currently required, although careful consideration should be given to subsequent triggering and consideration for remedial action may be required.

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				year, although both have triggered in previous years.	
<b>SP11</b>				The policy is being delivered as anticipated	No action required
<b>SP12</b>				The policy is being delivered as anticipated	No action required
<b>SP13</b>				The policy is being delivered as anticipated	No action required
<b>SP14</b>	Factor1	Annual building rate	This indicator has triggered for the third year running, as the average completions are well below 50% of the average annual requirement.	The 2019 result is significantly under the trigger level of 288 units for this Factor. The housing completions figure have decreased from last year (284 to 190) and it is a matter of concern that completions are significantly below 50% of the annual requirement. The low level of completions is due, in part, to the legacy of the economic recession where the number of submitted housing applications decreased significantly. There remains viability issues for developing in certain parts of the County Borough	Action required to improve overall housing delivery.
<b>SP15</b>	Factor 1	Yearly affordable housing unit numbers delivered through the planning system as a percentage of total housing units (based on units built)	Triggered for the 7 <sup>th</sup> consecutive year for the 10% and 25% areas, with figures way below the trigger level. It also triggered this year in the 40% area	Affordable housing is not being delivered at the required rates, but this is a corollary of general house building being low due to the economic climate. Low levels of development viability also impact on the level of affordable housing delivered and this, in conjunction with potential	Action required to improve affordable housing delivery.

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				reductions on capital grant funding could result in further reduction in the provision of affordable housing.	
<b>SP15</b>	Factor 2	Average House Price (over the base Viability Study 2009 level)	Triggered for the third year as house prices continue to increase.	The Factor has triggered for the third time. It is now almost £13,500 above the maximum sensitivity test used to set the affordable housing targets. In theory, the increase in house prices should mean that development should be more viable, and more affordable housing is delivered, but there are a number of factors that need to be considered on a site-by-site basis that influence this. Overall, there is a need to improve affordable housing delivery, and the increase in average house price would support this, rather than being a matter of concern.	No action currently required.
<b>SP16</b>	Factor 3	Number of employees in part time employment as a percentage of total employees in employment	Triggered for the seventh consecutive time.	This has effectively triggered every year, with the exception of the first year when a lack of data availability prevented it from being monitored.  The monitoring framework was set out before the economic downturn and sets out triggers that are more reflective of the more buoyant economic	No action currently required.

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				<p>climate. The economic downturn has undoubtedly been the reason that the percentage of part time workers has increased (with less full time employees and increasing part time employees). As a result the triggering factor is reflecting the economic conditions which are largely outside of the control of the development plan and, therefore, does not indicate that the policy is failing.</p>	
<b>SP17</b>	Factor 3	Area of Class B1 employment uses permitted within Commercial Opportunity Areas, as a percentage of total designated area	<p>Blackwood and Caerphilly have both triggered, as there has been no B1 office development within the defined areas with 5 years (Blackwood) and 3 years (Caerphilly). This is the sixth year in a row that Caerphilly has triggered and the fourth year for Blackwood.</p>	<p>The indicator relates to the granting of permission for class B1 office uses within the Commercial Opportunity Areas identified within each of the principal towns. Blackwood and Caerphilly have both triggered. The Commercial Opportunity Areas in both towns have relatively low vacancy rates and are occupied by a range of uses, although not B1 office use. There have also been office developments elsewhere in both towns, which is positive. It is not therefore considered that the lack of office development in itself is a sign of the failure of the policy.</p>	No action currently required.
<b>SP18</b>	Factor 2	Numbers of planning	Triggered for the seventh	The monitoring framework was set out	No action currently

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		applications that provide new formal play areas through S106 agreements	consecutive time.	<p>when development levels were high and the trigger level for this Factor was set against high levels of planning gain. Since the economic downturn the number of submitted planning applications has reduced significantly and, as a corollary, the numbers of facilities secured through S106 agreements to those applications have similarly decreased.</p> <p>Therefore the Factor is triggering as a direct result of the economic downturn and would be expected to rise when the economy starts to recover. The economic conditions are largely outside of the control of the development plan so the triggering of the Factor is not a significant indicator that the policy is failing.</p>	required.
<b>SP19</b>	Factor 1a	Number of Schemes identified in Policy TR5 delivered through Obligations and agreements.	Triggered for the first time.	This indicator considers the number of schemes that have been delivered in respect of Policy TR5 Transport Improvement Schemes in the Northern Connections Corridor. None of the five schemes identified within the LDP have been delivered for a period of 7 years. This is in itself not a failure of the plan, but relates to	No action currently required.

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				the limited financial resources to fund schemes. The schemes that have been prioritised are those within the most significant congestion issues.	
<b>SP20</b>	Factor 2	The Number of Monitored Links That Are Above CRF level that do not have planned improvements	Triggered for the second time, but has in fact triggered every year, but has not been recorded due to the trigger being over a 3-year period and that no data was available for the 2014 AMR.	<p>Four of the 17 monitored links are above their nominal design capacity, but 3 of the links have proposals in the LDP to address the issue.</p> <p>One of the links is not subject to proposals for improvement and therefore triggers the policy.</p> <p>There were improvements ongoing at the Pwllpant roundabout during the monitoring period and this would have had a consequential effect on the wider Caerphilly Strategic highway network. The improvement scheme has now been completed and the impacts of this will need to be considered through future monitoring as it is likely that congestion will reduce overall. Therefore, the triggering of this indicator is not considered to indicate that the policy is failing.</p>	No action currently required.
<b>SP21</b>				The policy is being delivered as anticipated	No action required

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<b>SP22</b>				The policy is being delivered as anticipated	No action required
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## Appendix 2: Strategic Policy Performance Against LDP Objectives

Please note that as a result of the waiving of the requirement to prepare a AMR for 2020, this table reflects the findings of the 2019 AMR Report

	LDP Objective	Commentary	Performance
1	Accommodate sustainable levels of population growth.	The 2011 Census identified that the county Borough has already accommodated the population levels that had been predicted for the end of the plan period. Whilst the projected population levels have been met, the associated housing development required to ensure that this population is accommodated in the most sustainable way has not been delivered as expected.	
2	Ensure that the County Borough is well served by accessible public open space and accessible natural green space.	The policies protecting and enhancing open and natural green space are performing well and the objective is being met.	
3	Ensure the effective and efficient use of natural and built resources while preventing the unnecessary sterilisation of finite resources through inappropriate development.	The policy framework is delivering appropriate development. Whilst policy SP10 is raising issues over development in designated SINCs, SLAs and VILLs, this development is very limited in scale and, on balance, is acceptable within those areas. As such the objective is being met overall.	
4	Ensure that the environmental impact of all new development is minimised.	SEA/SA monitoring of the environment is seeing significant overall positive effects from the plan. Protectionist and enhancing policies for the natural environment are also working and the objective is being met.	
5	Improve energy, waste and water efficiency while promoting environmentally acceptable renewable energy to maintain a cleaner environment and help reduce our impact on climate change.	Many of the measures used in addressing these issues are outside the scope of the LDP. However the policy framework is contributing toward the overall objective and the SEA/SA Monitoring is seeing positive effects in respect of those issues that are currently monitored, even though the rate of improvement may be low.	
6	Encourage waste management based on a hierarchy of reduce, reuse, recovery (including material recycling, energy recovery and composting) and safe disposal.	Many of the measures used to realise the hierarchy lie outside of the remit of the LDP. However the policy framework assists in delivering sustainable waste management and the SEA/SA Monitoring is realising positive effects in respect to certain elements of waste.	
7	Encourage the re-use and / or reclamation of appropriate brownfield and contaminated land and prevent the incidence of	The majority of allocated brownfield sites in the NCC and SCC have been reclaimed and redeveloped. The policy framework is controlling development to ensure that further contamination does not take place.	

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	further contamination and dereliction.	The objective is being met.	
8	Concentrate new development in appropriate locations along existing and proposed infrastructure networks that are accessible to pedestrians, cyclists and to public transport in order to sustain and complement the role and function of individual settlements.	This principle underpins the development strategy for the LDP and the allocations have taken this issue fully into account. This issue is also a consideration set out in the policy framework against which development proposals are considered. This objective is being met.	
9	Ensure an adequate and appropriate range of housing sites are available across the County Borough in the most suitable locations to meet the housing requirements of all sections of the population.	As outlined in objective 1 the projected population for the plan period has already been reached but only just over 50% of the required housing provision has been delivered. Whilst these low levels of housing development can be attributed to the economic climate leading to low development rates in the early part of the plan period, there are only two years left of the plan period there is insufficient time remaining to address the significant shortfall. Furthermore, affordable housing is also not being delivered at the levels required. As a result, this objective is not being met.	
10	Ensure that all new development is well designed and has regard for its surroundings in order to reduce the opportunity for crime to occur.	Design is a key consideration in respect of development proposals and is an important element of the policy framework. SEA/SA monitoring raises no issues in respect of design and crime related indicators are realising positive outcomes. This objective is being met.	
11	Identify, protect and, where appropriate enhance, valuable landscapes and landscape features and protect them from unacceptable development.	The plan has allocated landscapes for protection and these are protected through the policy framework. The SEA/SA monitoring realises positive outcomes for some landscape indicators, but there are some areas of concern in respect of some elements of the landscape and this needs to be monitored going forward.	
12	Identify, protect and enhance sites of nature conservation and earth science interest and ensure the biodiversity of the County Borough is enhanced.	Policy SP10 – Conservation of Natural Heritage has triggered as part of this monitoring assessment. Whilst the amount of land being lost is very small, this remains an issue moving forward for the plan although, given the small areas of land in question, the objective is not being met as proposed at the moment.	
13	Create appropriate new landscape and ecological features and habitats as an integral part of new development wherever	This has realised some positive results in both the LDP and SEA/SA monitoring processes. This objective is being met.	

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	appropriate.		
14	Manage, protect and enhance the quality and quantity of the water environment and reduce water consumption.	This issue has not received any negative impacts from the SEA/SA monitoring in the early part of the plan period, although the data has not been available for the previous 3 AMRs.	
15	Reduce the impact of flooding by ensuring that highly vulnerable development is directed away from areas of risk wherever possible.	SEA/SA monitoring has realised negative results for this issue for consecutive years. However, the indicators are based against a zero comparison and small areas can be affected by development and be acceptable as it is the use of the land that determines whether a site should not be utilised. Whilst small areas of land liable to flooding are subject to development, the proposed development is not unacceptable and, whilst the monitoring results are negative, the objective is largely being met (as highly vulnerable development is not being permitted in the flood zones).	
16	Reduce congestion by minimising the need to travel, promoting more sustainable modes of transport and making the most efficient use of existing transport infrastructure.	The imbalance between population and residential/employment development is having knock-on effects for this issue, which has realised negative results recently. Out-commuting as a proportion of total work related travel has increased this year and the figure now exceed the trigger point. Other indicators, such as the number of schools with travel plans, show some positive moves towards achieving this objective.	
17	Capitalise on Caerphilly's strategic position further developing its role as a commercial and employment centre in the heart of the Valleys City Region with strong links to the Heads of the Valleys area and as the smart alternative for locating development to Cardiff and Newport.	Employment development has been slower than anticipated due to economic conditions in the earlier part of the plan period. However, the 2019 AMR indicates lower rates of development this year compared to previous years. There has been no development on allocated EM1 employment land for employment use in this monitoring year. Furthermore, the amount of land granted permission on EM1 land has been the lowest rate since 2012. In terms of protected employment sites, development of floorspace has decreased significantly since last year and has been at one of the lowest rates seen in the plan period. Whilst the floorspace granted permission on EM2 employment land has increased slightly compared to last year, there is significant concern about the level of economic development taking place in the County Borough and the availability of attractive sites.	

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18	Provide and protect a diverse portfolio of employment land for a variety of employment uses, focusing in particular on higher value employment opportunities and sites to meet local need, including waste management facilities.	Whilst a number of employment sites have been developed over the plan period, it is important that there continues to be a diverse portfolio of sites available to meet demand. As above, there is concern about the take up of employment land in the County Borough, as low take up rates raises concern about the suitability of the sites that remain undeveloped within the LDP.	
19	Encourage the development of high quality, all season tourist attractions and tourist accommodation that complements the natural and built environment of the County Borough.	A total of 6 of the 9 allocations have been delivered, at least in part. As such this objective is being met.	
20	Maximise the efficient use of the existing infrastructure and encourage the necessary improvements to the network to sustain necessary levels of development at appropriate locations across the County Borough.	Rail related developments have progressed well. Highway improvements have not been delivered as expected, although this is due to the low levels of development that is taking place, which provides funding for these improvements. Overall progress is being made but the objective is not being delivered as anticipated.	
21	Protect and provide a wide range of community and health facilities which are appropriately located and easily accessible, and which meet the needs of all sections of the population.	The majority of allocations in the LDP either have either been delivered or have planning permission. This objective is being met.	
22	Maintain the vitality, viability and character of the County Borough's town and village centres and re-establish them as a focus for economic activity and community pride.	Policy SP4, which focusses on the principal town centres, has triggered as part of this assessment in respect of all four factors. Whilst this is a sign that the objective is not being delivered as well as anticipated, particularly in Bargoed, where there is a high vacancy rate, the indicators have been influenced by incomplete and out of date data.	
23	Maintain, enhance and develop a hierarchy of town and village centres which are easily accessible, and which meet the needs of all sections of the population.	Policy SP4, which focusses on the principal town centres, has triggered as part of this assessment in respect of all four factors. Whilst this is a sign that the objective is not being delivered as well as anticipated, particularly in Bargoed, where there is a high vacancy rate, the indicators have been influenced by incomplete and out of date data.	

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24	Protect and enhance the overall quality of the historic natural and built environment of the County Borough	SEA/SA monitoring has consistently realised strong positive outcomes for the historic environment with the policy framework protecting assets and the number of buildings at risk being reduced overall. The objective is being met.	
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### Appendix 3: SEA/SA Monitoring Overview

Please note that as a result of the waiving of the requirement to prepare a AMR for 2020, this table reflects the findings of the 2019 AMR Report

Objective	2011	2012	2013	2014	2015	2016	2017	2018	2019
To reduce the average resource consumption of each resident	X	DNA	NM						
To improve the condition of housing and ensure the range of housing types are accessible to meet the needs of residents.	+	+	+	+	++	X	+	X	X
To reduce the incidence of crime	+	X	X	+	+	+	+	X	O
To improve educational achievement	XX	X	+	+	X	X	O	XX	XX
To allow equal opportunities for all	NM								
To increase the percentage of people of working age in employment	XX	++	O	O	XX	+	+	X	+
To increase the wealth of individuals in CCBC	DNA	X	X	+	O	O	X	X	+
To ensure a sufficient range of employment sites are available	DNA	X	X	++	O	O	DNA	+	X
To improve the health of individuals	XX	X	O	++	O	+	XX	O	+
To retain the population of county borough to at least current levels and attain a more balanced demographic structure?	DNA	+	+	++	X	X	O	X	O
To allow all residents easy access to leisure facilities	DNA	+	++	+	++	++	++	+	O
To reduce air, noise, light and odour pollution and ensure air quality improves.	+	O	O	X	+	+	XX	O	XX
To protect the landscape value of the most important landscapes in the county borough and maintain a clean and accessible environment to encourage a greater sense of belonging.	DNA	X	O	O	X	+	++	O	X

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To protect the cultural identity of the county borough	DNA	+	X	O	+	+	O	++	+
To protect and enhance important historic assets	+	++	++	O	+	+	+	++	+
To protect aquifers and improve the quality and quantity of the water in our rivers and to reduce water consumption	++	O	DNA	O	++	+	DNA	DNA	DNA
To minimise the number of developments affected by flooding	X	O	O	+	X	X	X	X	X
To make the most efficient use of land and to reduce contamination and safeguard soil quantity, quality and permeability.	+	X	O	O	XX	O	X	X	X
To protect geologically important sites and improve their accessibility	++	++	++	++	++	++	++	++	++
To reduce the amount of waste produced and increase the reuse of materials	+	+	+	+	DNA	++	+	O	+
To enhance the biodiversity of the county borough	O	O	O	+	O	O	X	+	+
To reduce the total amount of CO <sub>2</sub> produced within the county borough each year	X	DNA	X	NM	NM	NM	NM	NM	NM
To reduce congestion by minimising the need to travel, encourage alternatives to the car and make best use of the existing transport infrastructure.	X	O	O	+	+	+	O	+	+
To increase the proportion of energy gained from renewable sources.	DNA	+	+	X	++	X	X	X	+
To improve the performance of material assets within the county borough	O	X	O	O	+	O	+	X	O