

**Deposit Replacement Caerphilly County  
Borough Local Development Plan**

**Amnewid Adnau Cynllun Datblygu Lleol  
Bwrdeistref Sirol Caerffili**

**STRATEGIC ENVIRONMENTAL ASSESSMENT/  
SUSTAINABILITY APPRAISAL**

**Document 4  
Assessment of the Replacement LDP  
(Document 4 –Written Analysis and Conclusions)**

**For Deposit Consultation**

**November 2015**

**ASESIAD AMGYLCHEDDOL STRATEGOL/  
ARFARNIAD CYNALADWYEDD**

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Deposit Replacement Caerphilly County Borough  
Local Development Plan

**Strategic Environmental Assessment /  
Sustainability Appraisal**

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## Preface

The Strategic Environmental Assessment/Sustainability Appraisal process requires that all the background, scoping and assessment information and results be included in an Environmental Report, which must accompany the LDP through its processes to Adoption. However there is a large amount of information to include in the report and, in order to make the SEA/SA more digestible, it has been split into five separate sub-reports, which reflect the two-stage SEA process outlined in the SEA Directive. The Reports are as follows:

- I Part 1 of the Strategic Environmental Assessment / Sustainability Appraisal of the Replacement Caerphilly Local Development Plan is comprised of 3 documents, namely:

***Document 1 : The Scoping Report***

The Scoping Report provides the background to the SEA/SA. It contains a review of the current state of the environment of the County Borough and sets out the sustainability objectives that form the basis of the assessment tests used to assess the Replacement Local Development Plan (LDP) throughout its production.

***Document 2 : The Review of Relevant Plans, Policies and Programmes***

In order to meet the procedural requirements of the SEA Directive, Part 1 of the SEA/SA must include a review of the relevant plans policies and programmes that might have implications for the production and implementation of the LDP. Plans, policies and programmes from European level down to local level, which are relevant to the role and purpose of the Replacement LDP, are reviewed and their likely implications for the Replacement LDP are identified.

***Document 3 : The Assessment of the Preferred and Alternative Strategies***

The first part of the assessment process is the formal assessment of the preferred and alternative strategies at the pre deposit consultation stage of the Replacement LDP. This document outlines how the strategies have been tested and then provides details of the assessments and analyses that will modify the Replacement LDP. Details of mitigation and changes to the Preferred Strategy are also included.

- II Part 2 of the Strategic Environmental Assessment / Sustainability Appraisal of the Replacement Caerphilly Local Development Plan is comprised of two documents, one that sets out the results of the assessments of the detailed Replacement LDP, and a second that undertakes the Habitats Regulations Assessment:

***Document 4 : The Assessment of the Replacement LDP (This Document)***

The Environmental Report provides the background to identifying the detailed Assessment Tests, and the results of the SEA/SA tests on the Deposit Replacement Plan. This includes a re-assessment of the LDP Strategy against the strategic Assessment Tests as well as the assessment of the detailed Replacement Plan against the detailed Assessment Tests. The main part of the Environmental Report will be the individual assessment of policies and proposals, which will be in the form of appendices.

Document 4 contains both the written analysis and assessment of the LDP Policies and allocations and the results proformas from the assessments of each policy and allocation. Consequently the complete document is extremely large. As a result in order to make the document more user friendly, it has been split into two parts, namely

- *Document 4 – Written Analysis and Conclusions* -This contains the written analysis of the assessments and the conclusions.
- *Document 4 – Appendix 4 – Assessment Results* - This contains all of the results proformas for the assessments

***Document 5 : The Habitats Regulations Assessment of the LDP***

The EC Habitats Directive (92/43/EEC) requires that the impacts that the Replacement LDP may have on European designated sites of conservation importance need to be assessed and, where necessary, mitigated against or minimised. The Habitats Regulations Assessment (HRA) is a stand-alone assessment that does not, in itself form part of the SEA/SA proper. However the HRA process utilises much of the background information and work that has been undertaken upon the SEA/SA and as such it is appropriate to include it within the SEA/SA umbrella as documents that have influenced the production of the Replacement LDP. The HRA influences the Replacement LDP in respect of its impact upon Natura 2000 sites in the same way as the SEA/SA does in respect of environmental considerations.

Together the 5 documents comprise the complete SEA/SA Environmental Report on the Replacement Caerphilly Local Development Plan.

# 1 Introduction and Background

- 1.1 It is a requirement that the Replacement LDP be subject to Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) as part of its preparation process. The SEA Directive requires that SEA be undertaken on the LDP to ensure that environmental considerations are taken into account in the decision-making processes for the LDP. The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the Regulations) requires that a sustainability assessment of the detailed LDP be undertaken at the Deposit stage of the LDP revision process. In practice the SEA and SA address the same things, whilst having different processes. As a result, best practice recommends that SEA and SA be undertaken together and this is how it has been undertaken for the Replacement LDP. The SEA/SA process identifies and assesses any likely significant effects that the implementation of the plan may have.
- 1.2 This document, in conjunction with Document 5 – Habitats Regulations Assessment (HRA), forms Part 2 of the SEA process and these documents complete the full SEA/SA of the Replacement LDP. The HRA has been included within the SEA/SA suite of documents even though it does not form part of the SEA/SA process, as it forms part of the overall assessment of the emerging Replacement LDP.
- 1.3 This assessment builds upon the work already undertaken in respect of the SEA/SA, which has been recorded in the Part 1 documentation. The progress on the SEA/SA has been a linear progression alongside the production of the Replacement LDP. It is not intended to revisit work that has already been covered by the Part 1 documentation, as this would require the regression of the LDP, which is undesirable and not practically achievable. This principle has been applied throughout the production of both the SEA/SA and LDP, with amendments and review being undertaken at each step in the process.
- 1.4 Given the above this assessment does not start from scratch, rather it moves forward from where the Part 1 documentation concluded. The starting point for the whole assessment process is the Sustainability Objectives identified in the Scoping Report. This report starts with the consideration of the LDP Strategy and then considers the objectives and defines Assessment Tests for the assessment of the policies and allocations in the LDP.



## **2 Identification of the Assessment Tests (ATs)**

- 2.1 SEA/SA Document 3 – Assessment of Preferred and Alternative Strategies (SEA/SA Document 3) outlines the methodology adopted for the assessment of the strategy options. The methodology required the identification of a suite of strategic questions, termed Assessment Tests (AT), which were asked against each of the five strategy options. These ATs were developed from the Sustainability Objectives, identified in SEA/SA Document 1 – Scoping Report (SEA/SA Document 1), which in turn were identified from the Baseline Assessment of the state of the environment. This approach provided an assessment that not only provided appropriate outcomes and results, but also had a fair degree of local distinctiveness as it reflected the issues facing the environment in the county borough. Given these strengths it was considered appropriate to adopt this general methodology for the identification of the ATs for the detailed LDP.
- 2.2 In producing the ATs for the alternative strategies, it was critical that they asked the questions at the appropriate level, i.e. the strategies are overarching elements of the development plan and it would be inappropriate to consider site-specific issues against them. Consequently the ATs that were developed for that assessment were broad brush and generic. Thirty-one ATs were subsequently identified and they are collectively termed the Strategic Tests.
- 2.3 Whilst it is appropriate to utilise the Strategic Tests for the assessment of the LDP Strategy, it is not appropriate to use them for the policies or allocations, as these are more detailed in nature. As a result a new suite of ATs, collectively known as the Detailed Tests, were required to be identified that were relevant to the detailed nature of the LDP policies and allocations. Again the starting point was the Sustainability Objectives. However a different approach to identifying the Detailed Tests was required, in order to make them appropriate for assessing the LDP policies and allocations. It is acknowledged that the Sustainability Objectives are overarching in nature, being comprised of a greater number of more detailed issues. Given the LDP policies and allocations are detailed in nature, they need to be assessed against the relevant component parts of each of the Sustainability Objectives.
- 2.4 The Sustainability Objectives were considered by the Council’s SEA Team who devised a series of Detailed Tests to be used in the assessment of LDP countywide policies and site allocations. These were then put to the Sustainability Group, who made alterations where appropriate. Ultimately, sixty-seven ATs were agreed for use in the assessment of countywide policies, and 50 to be used in the assessment of sites.

### **3 The Assessment Process**

#### **3.1 The Approach**

- 3.1.1 The SEA/SA process is meant to be integrated and iterative to the LDP preparation process, with the aim of bringing environmental considerations into decision-making. In process terms this can either be done by:
- 1 A broad brush assessment approach, considering how the LDP policies, as a whole, would have an effect, which of the policies may have an effect and then assess the broad implications of those policies against the ATs; or
  - 2 Assess each policy and allocation against the ATs to attain a detailed record of effects.
- 3.1.2 The first option provides a general assessment of the LDP effects, although this may lack some detail necessary to satisfying the Sustainability Appraisal part of the process. The second provides a comprehensive assessment of all the likely effects, although represents a major workload to assess all of the policies and allocations. Despite this the benefits that the second option offered, in terms of the level and detail of response and output, resulted in the decision being taken to utilise the second, and more work intensive, option.
- 3.1.3 SEA/SA is not, as under previous plans, an assessment or appraisal undertaken once the plan is largely completed. It is a more proactive process that begins before the start of the LDP and then takes place alongside the emerging LDP and continues after the plan is completed in the form of monitoring. In acknowledging this, however, it should be noted that the SEA/SA assessments can only be undertaken when the plan contains sufficient substance to be analysed, i.e. it is not possible to assess a plan without policies that have not been worked up, or the strategy “fleshed out”. Consequently the SEA/SA assessment process had to start at some point along the plan preparation process.

#### **3.2 The Assessment Procedure and Personnel**

- 3.2.1 The process has assessed each policy and allocation against the Detailed Tests and the LDP strategy against the Strategy Tests. This is an onerous and exhaustive task and time, resources and personnel had to be allocated to ensure its completion. The LDP has a top down structure from the strategy and Strategy Policies at the top, through the County-Wide Policies to the detailed allocations. This linear progression from strategy to detail fits well with the linear progression of assessment associated with the SEA/SA, so the decision was taken to assess the Strategy Options first, then the County-Wide policies and finally the site allocations.

##### **The Core Group (SEA Team)**

- 3.2.2 It was recognised that, in order to ensure the assessment work was undertaken and concluded on time, a core group of officers were identified who would be a constant part of the assessment process. In order to arrange and be able to attend regular meetings at short notice the core group needed to be small in number and have a range of knowledge to enable appropriate consideration of the ATs against the policies. It was decided a group of 5 officers was appropriate for this purpose and consisted of two officers from the Council’s Countryside Section, two from Strategic Planning and the Team Leader, Sustainable Development & Living Environment, whose remit includes sustainable development. These officers formed the core group and were involved in all of the assessments undertaken.

##### **Role of the Sustainability Group in the Assessment Process**

- 3.2.3 The Sustainability Group had an important role in the assessment process, although not the primary role in undertaking the assessments. The Sustainability Group did undertake some assessments at all levels of policy to ensure the appropriateness of the methodology and to

provide some ‘independence’ to bench mark and pursue a degree of quality assurance. Overall the group’s involvement had two aims:

A) To provide an unbiased view of the assessments

The Group assessed policies at all levels. Due to the composition of the Group, the assessments that were undertaken were independent of the Council, and as a result represent an unbiased assessment.

B To validate the officer assessments

The Group was also engaged to assess policies that had already been the subject of assessment by the Core Group. This provided a basis to validate the officer responses against the unbiased Sustainability Group versions.

- 3.2.4 Overall the involvement of the Sustainability Group has afforded the opportunity to validate the output from the assessments. Comparing the results emerging from the Sustainability Group against those from the officer groups, it was reassuring that there was a very high degree of similarity between them. No significant areas of contradiction were found and, whilst there were some differences, the differences that were identified were generally insignificant and were based around how the ATs were being interpreted. This again provided useful input to the process as it allowed for the interpretation of the ATs to be made more consistent.

**Assessment of the Strategy Options**

- 3.2.5 The Strategy Options were assessed against the 31 ATs set out within SA/SEA Document 3 (Assessment of Preferred and Alternative LDP Strategies). Option 1 was assessed by the Sustainability Group, with the remaining four being assessed by the SEA Team. The results of these assessments were agreed with the Sustainability Group prior to more detailed assessment stages being undertaken. The Strategy Policies within the Deposit Replacement Plan emanate directly from the Preferred Strategy which, in turn, formed one of the Strategy Options, therefore it was not deemed necessary to assess these separately.

**Assessment of the County-Wide Policies**

- 3.2.6 There were 25 County-Wide Policies in the version of the Deposit Replacement Plan at the stage that this assessment was undertaken. As for the Strategy Options, these assessments were undertaken by the SEA Team using the 67 ATs agreed with the Sustainability Group, with the results of these assessments also being agreed subsequently.

**Assessment of Site Allocations/Designations**

- 3.2.7 It was agreed with the Sustainability Group that some of the ATs used for the assessment of the County-Wide Policies were not applicable to the assessment of Site Allocations/Designations, due to them testing the effect on something on a wider scale. Therefore, 50 ATs were used, with the assessments being undertaken in the same manner as the others.
- 3.2.8 For those allocation policies that proactively seek development, or the retention of particular forms of ‘urban’ land use, each site allocated was specifically assessed. However, for policies whose aim is to protect land *from* development, particularly those concerned with environmental and open space designations, only the policy itself was deemed worthy of assessment, as the effect of each site allocated for that purpose was regarded as being identical.

**Updating**

- 3.2.9 The final version of the Deposit Replacement Plan contains additional County-Wide Policies that were not included, and therefore were not assessed, at the relevant point of the process. These additional policies have been assessed subsequently by the SEA Team, albeit without the input of the Sustainability Group.

## 4 Summary of Results

### 4.1 Assessment of the Strategy Options

4.1.1 Five options were considered for the purposes of formulating the Preferred Strategy and all were subject to assessment under this process. One of them, Option 5 (Targeting growth to the Mid Valleys and Southern Connections Corridors) was chosen to form the basis of the Replacement LDP Preferred Strategy.

#### **Option 1 – Continuation of the LDP Preferred Strategy**

##### **Overall Score**

<b>++</b> 7	<b>+</b> 58	<b>○</b> 42	<b>+ -</b> 4	<b>-</b> 31	<b>--</b> 13
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4.1.2 All strategy options are seeking growth and, as a result, there will always be tension between economic growth factors and environmental protection factors. However, the fact that this strategy option focuses on the five principal towns as the main poles of growth, and ensures that development is in accordance with the role and function of settlements, has the potential to deliver social and economic benefits across the County Borough as a whole. Inevitably, however, the higher levels of growth, as determined by the latter projections, will have more of an adverse impact in environmental terms. Overall however, this strategy option is positive in sustainability terms, although the number of double negatives outweighs the number of double positives, due to the latter three projections.

#### **Option 2 – Targeting Growth to the Heads of the Valleys Regeneration Area**

##### **Overall Score**

<b>++</b> 11	<b>+</b> 38	<b>○</b> 46	<b>+ -</b> 18	<b>-</b> 33	<b>--</b> 9
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4.1.3 All strategy options are seeking growth and, as a result, there will always be tension between economic growth factors and environmental protection factors. In such cases it is the social factors that often determine a strategy's overall performance. Targeting development to the Heads of the Valleys area promotes development in the most deprived strategy area and as such has potential to realise significant benefits. This is the case with this strategy scenario, the options realising strong positives effects from material assets and from improved demographic structures, whilst economic factors, such as housing and employment provision provide positives and environmental factors such as flooding and climate change, realise negatives.

#### **Option 3 – Targeting Growth to the Mid Valleys Corridor**

##### **Overall Score**

<b>++</b> 15	<b>+</b> 52	<b>○</b> 40	<b>+ -</b> 19	<b>-</b> 20	<b>--</b> 9
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4.1.4 Targeting development to the Mid Valleys Corridor has advantages in that it will directly benefit the settlements that lie within it. Development here would be more viable and deliverable than in the HOVRA, but it is hoped that the north of the County Borough would experience the positive knock-on effects of any such strategy, given its proximity. At the same time, large-scale greenfield expansion in the Southern Connections Corridor would be resisted, although market conditions would inevitably lead to some development around Caerphilly Basin, where the market is more buoyant.

4.1.5 Social and economic advantages can therefore be expected with this strategy option as well as a minimisation of detrimental environmental effects. However, these effects will be exacerbated by an increase in development as a result of a reduction in average household size. This projection aside however, this strategy option appears acceptable in sustainability and environmental terms. Overall, the strategy is more positive than the

previous two as regards sustainability, including in terms of the number of double positives realised. There are, however, a significant number of “+”s, indicating that the balance between positive and negative could change, depending on the circumstances.

**Option 4 – Targeting Growth to the Southern Connections Corridor**

**Overall Score**

++ 0	+ 32	○ 31	+ - 18	- 48	-- 26
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- 4.1.6 The approach of targeting development to the Southern Connections Corridor has the benefit of being attractive to the market. Sites allocated in line with this strategy will be viable, deliverable and will contribute to the achievement of a five-year housing land supply. However, this approach will not offer any benefit to settlements in the Mid Valleys Corridor or, especially, the Heads of the Valleys. Consequently, socio-economic conditions in the north of the County Borough will not improve and the vitality of settlements here will decline. Also, whilst Caerphilly town in particular will increase in size as new housing is developed, this approach has the potential to alter the character of the town in terms of its cultural identity. Finally, the negative implications of potentially large-scale greenfield land release in environmental terms are a vital consideration in terms of assessing this strategy.
- 4.1.7 Consequently, it does not appear that this strategy option would offer social or economic benefits to the County Borough as a whole, although it would bring about potentially significant environmental disbenefits. Therefore, it is not acceptable in sustainability terms.

**Option 5 – Targeting Growth to the Mid Valleys and Southern Connections Corridors**

**Overall Score**

++ 4	+ 51	○ 27	+ - 17	- 33	-- 23
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- 4.1.8 The potential benefits of this approach are the realistic prospect of a five-year housing land supply being maintained, but in such a way as to foster the vitality and viability of a majority of settlements within the County Borough. Although the level and rate of development in the Heads of the Valleys will be less pronounced, housing growth in those settlements in nearby settlements within the MVC may have a positive effect and may act as a potential catchment for those services and facilities in the principal town of Bargoed. Additionally, such housing development may act as a catalyst for employment growth in the MVC, something which HOVRA residents would be able to take advantage of. Certainly this position is borne out by the assessments for the lower level projections, which acknowledge the environmental impact of development across two thirds of the County Borough but realise positive overall outcomes.
- 4.1.9 For the higher level projections, the assessments realise negative outcomes. The environmental impact of a higher level and rate of development will outweigh and potential social and economic benefits, and indeed the positive scores obtained for some of these tests for lower level projections are reversed. For instance, a high level of housing development may be detrimental to cultural identity, rather than supporting it as a more modest level would do. Overall, this strategy option represents a sustainable approach when considered in the context of the Principal and 10 Year Average projections. However, the rate of development required by the latter three suggests that none of these would be a sustainable way forward. Overall, this strategy option is balanced in terms of the number of positive and negative results, although the number of double negatives heavily outweighs the number of double positives.

## 4.2 Comparison of Strategy Options

- 4.2.1 Of the five strategy options tested, three realised a positive result in terms of sustainability, when the cumulative results of each projection were taken into account (though it is necessary to remember that different projections scored differently, even for the same strategy option). Option 3 (Targeting Growth to the Mid Valleys Corridor) realised the most positive result due to the potential positive impact on the Heads of the Valleys as well as the Mid Valleys Corridor, and the less likelihood of Caerphilly Basin being so heavily developed as to have a detrimental environmental impact. Option 1 (Continuation of the LDP Preferred Strategy) was the next most positive, as locating development in accordance with the roles and functions of settlements is seen as sustainable in a socio-economic sense, although a greater spread of development may realise a greater environmental impact. Option 2 (Targeting Growth to the Heads of the Valleys Regeneration Area) was found to be marginally positive. Clearly there would be strong social and economic benefits in the Heads of the Valleys, but this would have an environmental impact. Also, these benefits would not be felt by the rest of the County Borough, and a question mark over the viability of this option leads to issues in terms of its successful implementation.
- 4.2.2 Option 5 (Targeting Growth to the Mid Valleys and Southern Connections Corridors) resulted in a neutral score, although the number of double negatives heavily outweighed the double positives due to environmental concerns. Social and economic benefits would result, but perhaps not to the degree that could be expected if the Heads of the Valleys had more of a focus in terms of the strategy.
- 4.2.3 Option 4 (Targeting Growth to the Southern Connections Corridor) realises a strongly negative score. Clearly, the large-scale release of greenfield land, particularly with the higher projections, would have a significant detrimental impact. At the same time, focusing development in the south of the County Borough, whilst taking account of patterns of viability, would have little impact on the MVC and, in particular, the HOVRA, thereby failing to have social and economic benefits where these are most needed.

### **Ranking of Strategy Options**

- 4.2.4 The ranking of strategy options in sustainability terms, based on the cumulative number of positive and negative scores obtained during the assessment of each projection, is as follows (from most sustainable to least):
- Option 3 – Targeting Growth to the Mid Valleys Corridor (67 positives, 29 negatives);
  - Option 1 – Continuation of the LDP Preferred Strategy (65 positives, 44 negatives);
  - Option 2 – Targeting Growth to the Heads of the Valleys Regeneration Area (49 positives, 42 negatives);
  - Option 5 – Targeting Growth to the Mid Valleys and Southern Connections Corridors (55 positives, 56 negatives);
  - Option 4 – Targeting Growth to the Southern Connections Corridor (32 positives, 74 negatives).
- 4.2.5 A critical part of the whole process is how the results of this assessment influence and change the LDP, making it more sustainable. It should be noted that it is not the role of the SEA/SA to produce a truly sustainable plan; rather it is incorporated in decision making with the result of making the LDP more sustainable. Consequently, whichever of the Strategy Options is used as the basis for the LDP, all of them would require changes to seek to change the negative and neutral results to positive ones.
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4.2.6 These changes usually take one of two forms:

- I. Changes to the text of the document. Commonly used to clarify how the strategy is applied or to address issues that have not been addressed.
- II. Mitigation, i.e. the provision of some form of gain that will compensate for a negative impact that cannot be changed.

### **4.3 The Preferred Strategy**

4.3.1 The overall aim of the SEA/SA process is to ensure that environmental and sustainability considerations are taken into account in decision making in the LDP. Consequently whilst the findings of the Strategy Assessment procedure found that Option 3 was the most sustainable strategy, it does not necessarily mean that it is the strategy that should be adopted as the basis of the LDP review. However, the findings of the assessment are a fundamental consideration of the strategy for the LDP and are required to be addressed.

4.3.2 Following consideration of the results of the assessments, Strategy Option 4 was not considered appropriate for use as the LDP Strategy. The other four strategies were relatively close in terms of their assessment outcomes, although Strategy Option 3 was considered to be the most sustainable due to its perceived likely social and economic impact on an area of severe deprivation.

4.3.3 However, Strategy Option 5 was preferred over Option 1, 2 and 3 for the following reasons. It will:

- i. attract net in migration, which is needed to sustain balanced communities;
- ii. balance the need for development across the whole of the county borough with environmental capacity;
- iii. target significant development to the Mid Valleys Corridor and thus provide social and economic benefits to the deprived Heads of the Valleys Regeneration Area;
- iv. provide development in areas of acute housing pressure, particularly in the Southern Connections Corridor;
- v. facilitate the release of attractive sites for employment in the southern connections corridor to attract inward investment in an area of identified demand;
- vi. partially address the air quality issues in Caerphilly Town;
- vii. maximise the potential to locate significant new development close to public transport nodes and in particular rail stations;
- viii. provide the necessary physical and social infrastructure to support the planned level of growth over the plan period;
- ix. provide the most deliverable and viable development schemes for the County Borough; and
- x. maximise the social, economic and environmental opportunities that are likely to arise throughout the plan period.

### **4.4 Assessment of the County-Wide Policies**

4.4.1 Twenty-seven policies are proposed for inclusion within the Replacement Deposit Plan and these were assessed against the 67 detailed ATs drawn up for this purpose.

**CW 1 – Climate Change**

**Score**

++ 10	+ 9	○ 48	+ - 0	- 0	-- 0
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4.4.2 CW 1 seeks to address climate change through permitting proposals that increase renewable energy generation and reduce energy demand. Positives were realised in respect of environmental factors and those concerned with climate change and energy efficiency and use. It is not anticipated that the criteria included within the policy would have a detrimental impact in terms of the developability of sites for other uses.

**CW 2 – Renewable and Low Carbon Energy in New Development**

**Score**

++ 6	+ 4	○ 57	+ - 0	- 0	-- 0
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4.4.3 CW 2 requires an energy assessment to test the feasibility of renewable energy generation in development over a particular size. Positives were realised in respect of those factors concerned with climate change and energy efficiency and use. This may have an impact in terms of the viability of residential sites, although not to the degree that any negatives have been realised against the relevant tests.

**CW 3 – Sustainable Transport, Accessibility and Social Inclusion**

**Score**

++ 7	+ 13	○ 46	+ - 1	- 0	-- 0
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4.4.4 CW 3 seeks to ensure that new development supports the use of sustainable modes of transport. Although the assessment realises a lot of neutral scores, there are positives in a variety of areas, notably accessibility to services and facilities, resource consumption and climate change and community development through the beneficial impact on potentially marginalised sectors of the population. The policy therefore supports the principles of sustainable development.

**CW 4 – Amenity**

**Score**

++ 0	+ 1	○ 64	+ - 0	- 2	-- 0
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4.4.5 The policy explicitly seeks to ensure that development is located in such a way as to protect the amenity and viability of neighbouring land uses, thereby ensuring a harmonious pattern of development within each settlement. Whilst this is in compliance with planning considerations, its effect is negligible in sustainability terms as indicated by the predominantly neutral assessment. Whilst there will be a positive impact in terms of quality of life due to the requirement to protect amenity, there is the potential for a negative effect in that the range of uses likely to be permissible on particular sites will be constrained, particularly certain industrial or waste management-related ones. However, it is considered that those sites identified within the Plan as being suitable for such uses have been done so having had regard for such considerations.



**CW 5 – Design Considerations: Highways**

**Score**

<b>++</b> 3	<b>+</b> 3	<b>○</b> 61	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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4.4.6 CW 5 sets out certain highways requirements in respect of new development. Although realising predominantly neutral results, there are positives for those transport-related tests set out above, both those directly concerned with the provision of an effective, integrated multi-modal transport network and those related to the environmental impact, such as the effect of emissions. Despite the high number of neutral results, secondaries have been noted for sustaining the local community and improving access to services and facilities, implying the degree to which the highway network can impact on a wide range of considerations which are relevant to the planning system.

**CW 6 – Natural Heritage Protection**

**Score**

<b>++</b> 5	<b>+</b> 10	<b>○</b> 45	<b>+ -</b> 2	<b>-</b> 5	<b>--</b> 0
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4.4.7 CW 6 exists to ensure the protection and enhancement of several natural heritage designations, and the characteristics thereof. The assessment clearly shows a positive impact on those tests that relate directly to the environment, such as landscape and biodiversity protection and water quality, as well as related ones such as the impact on climate change. In turn, more tacit factors such as the impact on quality of life and provision of access to recreational facilities also realise a positive score, thereby confirming that the purpose of the policy is likely to be achieved. However, due to its nature as a protection policy, there will be a potentially negative impact on factors generally related to the development of land such as the reduction of brownfield or derelict land or the provision of affordable housing. In addition, it could impinge on the development of those uses considered suitable for countryside locations, such as renewable energy generation. However, bearing in mind that most sites conducive to urban forms of development are located away from those SLAs, VILLs and other designations mentioned in the policy, it is not likely that these negatives would have a serious impact on the amount of land available for development. However, it is recommended that the policy makes specific reference to guarding against habitat fragmentation.

**CW 7 – Protection of the Water Environment**

**Score**

<b>++</b> 5	<b>+</b> 4	<b>○</b> 56	<b>+ -</b> 0	<b>-</b> 2	<b>--</b> 0
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4.4.8 CW 7 seeks to ensure the protection of the water environment in relation to development proposals. Whilst being largely neutral, this assessment demonstrates that the policy will have a positive impact on a series of environmental considerations (water quality and efficiency of water use, flood mitigation, resource consumption and climate change, habitat creation and enhancement and biodiversity). However, it could contribute to increasing flood risk in the first place and have a secondary negative impact on the amount of developable land available. Overall, the positive impact of the policy in sustainability terms will far outweigh the more negligible impact on deliverability.

**CW 8 – Trees, Woodlands and Hedgerow Protection****Score**

<b>++</b> 6	<b>+</b> 6	<b>○</b> 54	<b>+ -</b> 1	<b>-</b> 0	<b>--</b> 0
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- 4.4.9 The policy seeks the protection of trees, woodlands and hedgerows in relation to new development. The policy will have a positive impact on a series of environmental considerations (landscape quality, habitat creation and enhancement, tree and hedgerow protection, biodiversity and climate change), as would be expected. However, these results will also have the effect of realising positives in a range of wider, yet related, areas, such as quality of life, design and heritage importance.

**CW 9 – Protection of Open Space****Score**

<b>++</b> 5	<b>+</b> 13	<b>○</b> 46	<b>+ -</b> 1	<b>-</b> 2	<b>--</b> 0
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- 4.4.10 The policy seeks to ensure that development does not occur in such a way as to reduce the amount of open space within a settlement below a level required to satisfy local need. As would be expected, a number of positive results are realised for a variety of issues (provision of, and accessibility to, facilities and services, quality of life, community development, design, and environmental ones such as climate change, biodiversity and habitat creation and enhancement). There is a potential negative impact in that the amount of developable land within settlements could be constrained, but overall, the policy has a positive effect and adheres to the principles of sustainable development.

**CW 10 – Protection of Community and Leisure Facilities****Score**

<b>++</b> 6	<b>+</b> 9	<b>○</b> 52	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.11 The policy is similar to CW 9 but, instead, seeks to ensure the protection of community and leisure facilities other than open space. As it does not potentially impinge on the amount of developable open land, no negative results are realised. In contrast, there are several positives in areas such as sustaining the community and community development, meeting educational need, provision of facilities and services and quality of life.

**CW 11 – Protection of Rural Commercial Facilities****Score**

<b>++</b> 2	<b>+</b> 8	<b>○</b> 57	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.12 The policy seeks to ensure the protection of commercial facilities such as shops and pubs in those rural settlements where their loss would be of detriment to the local community. As it does not potentially impinge on the amount of developable open land, no negative results are realised. In contrast, there are several positives in areas such as sustaining the community and community development, meeting educational need, provision of facilities and services and quality of life.

**CW 12 – Leisure and Open Space Provision****Score**

<b>++</b> 7	<b>+</b> 14	<b>○</b> 46	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.13 CW 12 requires the provision of useable open space and children's play facilities on housing developments over a certain size. No negative scores have been realised and, as

would be expected, the policy scores favourably in terms of those considerations concerning locational attractiveness: quality of life; sustaining the community; access to recreational facilities; design standards; and reducing inequality. Additionally, it also has the potential to be of environmental benefit and scores positively in the following areas: green landscapes; biodiversity; climate change; habitat creation and enhancement; and protection of trees and hedgerows.

#### **CW 13 – Affordable Housing Planning Obligation**

##### **Score**

<b>++</b> 4	<b>+</b> 7	<b>○</b> 56	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.14 Affordable housing is delivered as part of the primary development of market housing. The effects associated with the principal development will be attributed to the housing development policy. The policy realises positive scores in terms of community-based considerations such as benefiting vulnerable/minority groups, sustaining the community, quality of life and reducing inequality. In addition, there are positives in terms of improving housing stock, promoting a mix of housing types and redeveloping derelict land.

#### **CW 14 – Affordable Housing Exception Sites**

##### **Score**

<b>++</b> 4	<b>+</b> 6	<b>○</b> 52	<b>+ -</b> 0	<b>-</b> 4	<b>--</b> 1
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- 4.4.15 The purpose of CW 14 is to ensure the provision of affordable dwellings within rural settlements that otherwise would not be permissible. It is similar to CW 13 in that it realises positive scores in terms of community-based considerations such as benefiting vulnerable/minority groups, sustaining the community, quality of life and reducing inequality. In addition, there are positives in terms of improving housing stock and promoting a mix of housing types. However, the policy targets development to greenfield sites and therefore there are negatives in terms of environmental considerations such as landscape quality, biodiversity, protection of agricultural land and trees and hedgerows. The policy is not likely to bring about large scale development, however, and the positive impact of fulfilling the affordable housing need in these settlements will outweigh any detrimental environmental effects.

#### **CW 15 – Creating Sustainable Communities: Housing for Older People**

##### **Score**

<b>++</b> 2	<b>+</b> 8	<b>○</b> 57	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.16 CW15 ensures that housing developments of a certain size should make provision for older people. As with CW13 and CW14, positive scores are realised for a number of community-based considerations, namely: reducing inequality; considering the needs of vulnerable/minority groups; sustaining the community; and improving quality of life. It will also promote a mix of housing types across the County Borough. It is not anticipated that there will be any negative impacts although setting aside a proportion of development for older people could have a secondary impact on educational establishments, as those units could otherwise generate additional school places, for example.

**CW 16 – Use Class Restrictions: Business and Industry****Score**

<b>++</b> 1	<b>+</b> 15	<b>○</b> 47	<b>+ -</b> 0	<b>-</b> 4	<b>--</b> 0
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4.4.17 CW16 categorises employment sites into business parks and primary sites, and sets out those uses that are permissible on each. Whilst there are negatives in terms of water quality and greenhouse gas emissions, these appear to relate to the primary objective of allocating and protecting employment land per se, rather than placing restrictions on each site in terms of permissible uses. There are positives in a range of areas including: education provision and skills; job creation and business growth; and waste management. Overall, the policy can be seen as facilitating the location of a range of diverse, yet complementary, uses on such sites, where appropriate, whilst protecting the higher quality sites for appropriate development.

**CW 17 – Use Class Restrictions: Retail****Score**

<b>++</b> 3	<b>+</b> 6	<b>○</b> 53	<b>+ -</b> 1	<b>-</b> 4	<b>--</b> 0
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4.4.18 CW 17 seeks to ensure that the predominance of A1 uses in principal and local centres and primary retail areas is retained. The assessment is somewhat mixed with both positive and negative results being realised, however the overall picture is positive. The assessment suggests a beneficial impact in terms of economic factors (supporting the retail hierarchy, encouraging inward investment and supporting business start ups) as well as community-orientated ones such as supporting community development, delivering services in accessible locations and supporting the role and function of settlements. In these respects, the policy adheres to the principle of sustainability. However, in terms of job provision, jobs could both be provided (within centres) and lost (as the ability for alternative uses to occupy town centre sites is constrained – for this reason, there is also a negative in terms of the provision of a broad range of employment opportunities). There are negatives in terms of the impact on AQMAs (this relates specifically to Caerphilly, as an attractive town centre has the potential to exacerbate congestion) and transport emissions. However, the solution to this would be to provide an integrated, multi-modal transport network that can adequately service such centres without bringing about problems in this area.

**CW18 – Use Class Restrictions: Retail Warehouse Park****Score**

<b>++</b> 6	<b>+</b> 10	<b>○</b> 50	<b>+ -</b> 1	<b>-</b> 0	<b>--</b> 0
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4.4.19 The policy seeks to ensure that retail warehouse park proposals, and the range of uses permissible on them, are appropriately located in order that they do not have a detrimental impact on town centres. As such, it will have a range of positive impacts on various considerations, including: community-orientated (sustaining the local community, community development, local inequality, promoting vibrant and attractive centres, targeting development according to the role and function of settlements, accessibility); economic (supporting the retail hierarchy, job provision); and environmental (emissions, reduction of derelict land, alternative modes of transport). The only potential negative is realised for inward investment, as the policy locationally constrains certain retailers. Conversely however, it could also realise a positive by directing those retailers towards appropriate locations.

**CW 19 – General Locational Constraints****Score**

<b>++</b> 0	<b>+</b> 14	<b>○</b> 53	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.20 CW 19 sets out general policy constraints for development, including those categories of development that are permissible outside settlement boundaries. As the policy is influenced directly by general planning considerations and therefore incorporates the principles of sustainable development, no negative scores are realised. The policy is assessed positively in terms of: the redevelopment of brownfield land (as it seeks to direct development to within settlements); and a range of environmental considerations (as urban forms of development outside settlements are generally considered unfavourable).

**CW 20 – Locational Constraints: Retailing****Score**

<b>++</b> 3	<b>+</b> 7	<b>○</b> 53	<b>+ -</b> 1	<b>-</b> 3	<b>--</b> 0
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- 4.4.21 CW 20 seeks to constrain the provision of new retail floorspace outside of principal town centres, in order to protect the vitality and viability of those (as well as local) centres. The results of the assessment are very similar to those for CW 17 as both policies are concerned with ensuring that town centres remain the County Borough's primary retail locations. The one difference is that the potential for inward investment realises both a positive and negative result as the policy places a locational constraint on new retail development.

**CW 21 – Locational Constraints: Retail Warehousing****Score**

<b>++</b> 0	<b>+</b> 0	<b>○</b> 58	<b>+ -</b> 1	<b>-</b> 5	<b>--</b> 3
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- 4.4.22 The policy does not address the vitality or viability of existing centres. The assessment has therefore taken the view that the policy has negative connotations in respect of maintaining communities and settlements. Specific reference and protection towards the vitality and viability of primary and local centres would reverse many of the negative effects.

**CW 22 – Locational Constraints: Housing for People in Need of Care****Score**

<b>++</b> 2	<b>+</b> 9	<b>○</b> 56	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.4.23 CW 22 concerns the provision of housing for people in need of care and requires that it be located within settlements and easily accessible in terms of services and facilities. Positive results are realised for social considerations as well as accessibility to services and facilities.

**CW 23 – Locational Constraints: Rural Development and Diversification****Score**

<b>++</b> 1	<b>+</b> 11	<b>○</b> 43	<b>+ -</b> 5	<b>-</b> 6	<b>--</b> 1
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- 4.4.24 CW 23 permits rural development and diversification schemes in accordance with certain criteria, including the reuse of existing buildings where possible and having consideration for existing natural heritage features. Negatives are scored in terms of potential impact on the landscape as the policy by its nature will affect sites in the open countryside, as well as

job provision in accessible locations, car reliance and journey length for the same reason. There is also the potential for detrimental impact on water quality, biodiversity and trees and hedgerows, depending on the use proposed. However, it would be expected that any potential negative impact would be assessed at planning application stage. There are positive scores in terms of quality of life and sustaining the community, access to, and provision of, recreational facilities, renewable energy generation, climate change and habitat creation and enhancement. Although mentioned in the reasoned justification, it was felt by the assessors that the policy should be more explicit in terms of taking into account landscape and biodiversity considerations. However, the requirement for the “retention and enhancement of existing natural heritage features” suggests that the policy has addressed these elements.

**CW 24 – Locational Constraints: Conversion, Extension and Replacement of Buildings in the Countryside**

**Score**

<b>++</b> 1	<b>+</b> 3	<b>○</b> 63	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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4.4.25 As a policy concerned with existing rural buildings, it is not likely to have a significant an impact in terms of the number of buildings affected. The result of the assessment reflects this as, overall, it scores largely neutral. However, there are positives in terms of protecting/improving housing stock; landscape quality; agricultural land; and standards of design. It will therefore serve to ensure that such development is appropriate in scale and design within the context of a rural environment, as well as to conserve that environment itself.

**CW 25 – Locational Constraints: Gypsy and Traveller Caravan Sites**

**Score**

<b>++</b> 1	<b>+</b> 9	<b>○</b> 56	<b>+ -</b> 1	<b>-</b> 0	<b>--</b> 0
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4.4.26 The provision of gypsy and traveller sites is likely to have a range of beneficial social impacts: promoting a mix of housing types; reducing inequality and considering the needs of vulnerable/minority groups; and improving access to services/facilities. Alongside this, there is the potential for knock-on economic benefits such as facilitating business start ups and aiding business growth, as catering in residential terms for an additional sector of the community represents an inclusive approach in wider economic terms as well.

**CW 26 – Locational Constraints: Minerals**

**Score**

<b>++</b> 0	<b>+</b> 8	<b>○</b> 59	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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4.4.27 Minerals safeguarding areas cover extensive areas of the County Borough, including the open countryside. As this policy places a constraint on development that could impact on the ability of such resources to be extracted, it is likely to have a positive impact in terms of conservation, with regard to landscape, biodiversity, habitat, heritage and agricultural land.

**CW 27 – Locational Constraints: Mineral Site Buffer Zones**

**Score**

<b>++</b> 0	<b>+</b> 8	<b>○</b> 59	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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4.4.28 Mineral site buffer zones are located in the open countryside. As this policy places a constraint on sensitive development within such areas, it is likely to have a positive impact

in terms of conservation, with regard to landscape, biodiversity, habitat, heritage and agricultural land.

**Summary**

4.4.29 Overall, the County-Wide Policies realise overwhelmingly positive results. Taken as a whole, the 27 Policies together scored 305 positives compared with 42 negatives (single and double combined). Only the following ten Policies have registered at least one single or double negative:

- CW 4 – Amenity;
- CW 6 – Natural Heritage Protection;
- CW 7 – Protection of the Water Environment;
- CW 9 – Protection of Open Space;
- CW 14 – Affordable Housing Exception Sites;
- CW 16 – Use Class Restrictions: Business and Industry
- CW 17 – Use Class Restrictions: Retail;
- CW 20 – Locational Constraints: Retailing;
- CW 21 – Locational Constraints: Retail Warehousing;
- CW 23 – Locational Constraints: Rural Development and Diversification.

4.4.30 CW 4 realises two single negatives and only one single positive, therefore has received a negative assessment, although it needs to be borne in mind that the vast majority of ATs scored neutral. The negatives were realised as protecting amenity could potentially reduce the range of uses permitted on industrial estates, therefore could have an impact on providing jobs in accessible locations and providing recycling facilities. However, in reality this is unlikely as those sites identified within the Plan as being suitable for such uses have been done so having had regard for such considerations. Therefore, it is not considered necessary to address the wording of the Policy.

4.4.31 CW 21 scores no positives, single or double, but five single negatives and three doubles. The assessment concludes that the Policy does not address the vitality and viability of existing centres, and that specific reference to their protection is required. Doing so, it is claimed, would reverse many of the negative effects. However, the Policy implies that retail warehouse units should be confined, firstly, to retail warehouse parks and, as a second preference, to principal and local centres, by stating that they will only be permitted elsewhere if suitable and available sites are unavailable at these locations. It is considered that this requirement seeks to protect the vitality and viability of centres by directing retail warehousing to appropriate locations in the first instance i.e. retail warehouse parks or town centres, especially when considered in conjunction with CW 18 which requires retail proposals to demonstrate unsuitability as town centre occupants prior to seeking to locate on a retail warehouse park. Therefore, it is not considered necessary to address the wording of the Policy.

4.4.32 The remaining eight Policies mentioned above that have scored negatives in at least one AT have all received overall positive assessments. Individual comments have already been made in relation to the assessment of each one and it is not considered necessary to amend the wording of these policies.

## **4.5 Assessment of the Site Allocations**

4.5.1 As previously mentioned, for those allocation policies that proactively seek development, or the retention of particular forms of 'urban' land use, each site allocated or protected was

specifically assessed. However, for policies whose aim is to protect land *from* development, particularly those concerned with environmental and open space designations, only the policy itself was deemed worthy of assessment, as the effect of each site allocated for that purpose was regarded as being identical. The results are set out below by topic. For the sake of brevity, comments are only made on the strategic sites, as well as those sites that have realised negative assessments, and that therefore require addressing.

**Strategic Sites**

**MVC1 – Parc Gwernau, Maesycwmmmer**

**Score**

<b>++</b> 9	<b>+</b> 4	<b>○</b> 23	<b>+ -</b> 5	<b>-</b> 1	<b>--</b> 8
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**SCC1 – South East Caerphilly**

**Score**

<b>++</b> 9	<b>+</b> 5	<b>○</b> 21	<b>+ -</b> 6	<b>-</b> 1	<b>--</b> 8
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- 4.5.2 Both sites scored negatively in terms of their impact with regard to environmental concerns, although positively in terms of improving housing stock, facility and service delivery and sustaining the local community generally. Overall, both were assessed positively. It is recognised that the potential negative impact of development at these locations will be mitigated against at planning application stage, should these sites come forward, and therefore it is not proposed to remove or alter these site allocations on the basis of this process.

**Countryside and Landscape Designations**

**SI1 – Green Wedges**

**Score**

<b>++</b> 2	<b>+</b> 6	<b>○</b> 42	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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**NH1 – Special Landscape Areas**

**Score**

<b>++</b> 3	<b>+</b> 6	<b>○</b> 41	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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**NH2 – Visually Important Local Landscapes**

**Score**

<b>++</b> 2	<b>+</b> 4	<b>○</b> 44	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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**NH3 – Sites of Importance for Nature Conservation**

**Score**

<b>++</b> 4	<b>+</b> 0	<b>○</b> 46	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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- 4.5.3 None of these designations realised any negative effects and, clearly, scored positively in terms of their environmental effects. No amendments are proposed.



**Minerals and Waste****MW1 – Minerals and Waste Handling****Score**

++ 0	+ 1	○ 49	+ - 0	- 0	- - 0
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**MN1 – Mineral Site Buffer Zone****Score**

++ 0	+ 7	○ 43	+ - 0	- 0	- - 0
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**MN2 – Minerals Safeguarding****Score**

++ 0	+ 7	○ 43	+ - 0	- 0	- - 0
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- 4.5.4 Mineral buffer zones and safeguarding areas constrain development for other uses in relevant areas, thereby having a positive environmental impact. No negative results were realised and no amendments are proposed.

**Housing****H1 – Housing Allocations****Score\***

++ 122	+ 511	○ 2781	+ - 25	- 304	- - 57
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\*Cumulative score for all 76 allocations. Individual assessments are contained in Appendix 3.

- 4.5.5 The following sites have realised negative assessments (more double and single negatives than positives):
- H1.14 Cwm Gelli Farm, Blackwood;
  - H1.15 Land at Pencoed Fawr Farm, Blackwood;
  - H1.22 West of Ty Mawr Farm, Croespenmaen;
  - H1.26 Land off Valley View, Hengoed;
  - H1.29 Ty Du (and land north, west and east), Nelson;
  - H1.31 Land north of A472, Newbridge;
  - H1.34 North of Woodfield Park, Penmaen;
  - H1.35 Oakdale Golf Club, Penmaen;
  - H1.37 Land south of Tir-y-Birth Farm, Penpedairheol;
  - H1.38 Land at Hawtin Park (east), Pontllanfraith;
  - H1.39 Land at Hawtin Park (west), Pontllanfraith;
  - H1.49 Pandy Road, Bedwas;
  - H1.59 Land at Glendale, Caerphilly;
  - H1.60 Land at Abertridwr Road, Caerphilly;
  - H1.62 Gwern y Domen, Caerphilly;
  - H1.63 Land north of Westhaven, Caerphilly;

- H1.64 Land south of Rudry Road, Caerphilly;
- H1.71 Land off Snowdon Close, Risca;
- H1.75 Land adjacent to Pen-y-Cwarel Road, Wyllie.

4.5.6 The sites in question are largely greenfield and, in some cases, lie beyond existing settlement boundaries as delineated by the adopted LDP and are subject to environmental designations such as SLAs. They have realised more negative results than positive ones on the basis of the potential effect of development on relevant characteristics, such as biodiversity, landscape and trees and hedgerows. In the case of the larger sites, these negative effects are exacerbated by the potential scale of development, and these sites also realise negatives in areas such as transport emissions and climate change.

4.5.7 Having said that, the integration of sites to the existing transport network, as well as the ability for them to be accessed by a variety of modes, is factored in to the site allocation process, as is their relationship to complementary facilities and services. This is borne out by the fact that all sites score positively in terms of how they complement the role and function of the settlement within which they are located. Where environmental characteristics are pertinent to a particular site and need to be specially considered, this will be done at planning application stage, which will enable appropriate mitigation measures to be put in place, where necessary. The assessments also recognise that development can serve as an opportunity for habitat creation, as well as loss, by taking account of, and preserving, such features as part of a development’s design process. It is not considered necessary to propose any amendments to the list of housing site allocations as a result of this assessment.

**Employment**

**E1 – Employment Allocations**

Score\*

<b>++</b> 100	<b>+</b> 109	<b>○</b> 334	<b>+ -</b> 13	<b>-</b> 32	<b>--</b> 15
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\*Cumulative score for all 12 allocations. Individual assessments are contained in Appendix 3.

**E2 – Employment Sites Protection**

Score\*

<b>++</b> 105	<b>+</b> 490	<b>○</b> 1120	<b>+ -</b> 0	<b>-</b> 35	<b>--</b> 0
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\*Cumulative score for all 35 sites. Individual assessments are contained in Appendix 3.

4.5.8 No site allocated for employment received an overall negative assessment, although the following did realise a high number of negative scores, relative to the others:

- E1.3 Ty Du, Nelson;
- E1.8 Land at Tredomen, Ystrad Mynach;
- E1.11 Land at Rudry Road, Caerphilly.

4.5.9 These are large, substantial greenfield sites located beyond existing the existing boundaries of settlements and, therefore, the reasons for these negative scores are the same as for those housing allocations mentioned above. These sites form strategically important aspects of the overall portfolio of employment land in the County Borough going forward over the lifetime of the Replacement LDP and it is considered appropriate to include them, whilst sustainably taking account of any special environmental characteristics as part of their development, and mitigating against any negative effects insofar as is possible.

4.5.10 Policy E2, as one which seeks to protect existing employment sites, was regarded as being highly positive in terms of its economic effects as well as more widely in terms of sustaining local communities. The fact that the policy is seeking to protect existing development, rather than add new, means that negative effects in terms of social or environmental factors were avoided.

**Commercial Development**

**C1 – Principal Town Centre Boundary**

Score\*

++ 15	+ 25	○ 203	+ - 7	- 0	-- 0
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\*Cumulative score for all 5 sites. Individual assessments are contained in Appendix 3.

**C2 – Primary Retail Areas**

Score\*

++ 6	+ 10	○ 80	+ - 4	- 0	-- 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

**C3 – Retail Warehouse Parks**

Score\*

++ 0	+ 14	○ 75	+ - 3	- 8	-- 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

**C4 – Commercial Opportunity Areas**

Score\*

++ 43	+ 116	○ 312	+ - 10	- 9	-- 0
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\*Cumulative score for all 10 sites. Individual assessments are contained in Appendix 3.

4.5.11 Principal town centre boundaries and primary retail areas are assessed as having a positive effect in terms of improving quality of life and community development, by virtue of promoting the retail hierarchy and ensuring that town centres are protected for facilities such as retail and complementary uses.

4.5.12 The two retail warehouse parks identified both realise positive results overall as they complement C1 and C2 in terms of creating attractive and viable town centres,, although given their out-of-town location, they score negatively in terms of bringing about increased journey distance, probable reliance on the car and transport emissions. Gallagher Retail Park will also have an impact on Caerphilly town centre AQMA, although it could potentially improve the situation by taking traffic out of the town centre.

4.5.13 All commercial opportunity areas identified will have an overall positive impact, although C4.7 (Parc Gwernau, Maesycwmmmer) realises a number of negatives in terms of environmental impact. However, this allocation is only one element of a much larger scheme. Amending or removing C4.7 will have no impact on these factors, bearing in mind the wider context of residential and community facilities development at this location.

**Community Facilities****CF1 – Cemeteries****Score\***

<b>++</b> 0	<b>+</b> 16	<b>○</b> 267	<b>+ -</b> 2	<b>-</b> 14	<b>--</b> 1
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\*Cumulative score for all 6 sites. Individual assessments are contained in Appendix 3.

**CF2 – Schools****Score\***

<b>++</b> 18	<b>+</b> 97	<b>○</b> 324	<b>+ -</b> 1	<b>-</b> 10	<b>--</b> 0
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\*Cumulative score for all 9 sites. Individual assessments are contained in Appendix 3.

**CF3 – GP Surgeries****Score\***

<b>++</b> 2	<b>+</b> 20	<b>○</b> 78	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

- 4.5.14 In terms of the cemetery allocations, the overall assessment is marginally positive, as each site is scored negatives for its potential impact on groundwater quality and its impact on watercourses. However, groundwater monitoring is required to take place prior to the installation of such facilities and, therefore, the practical impact should be accounted for. Only sites CF1.5 (Bedwas Cemetery) and CF1.6 (Nantgarw Cemetery) realise overall negative assessments, due to the presence of trees and hedgerows. It is expected that these issues will be addressed at planning application stage, within the context of preserving such features or mitigating any negative impact.
- 4.5.15 All school allocations receive positive assessments, although CF2.7 (Land south of Rudry Road) scores a relatively high number of negatives due to the impact on environmental factors such as landscape, biodiversity, habitat and the fact that part of the site is within a C2 flood risk area. Again, these issues will be addressed at planning application stage, although the school is only one element of a larger residential scheme. Therefore, amending or removing CF2.7 will have no impact on these factors, bearing in mind the wider context of residential development at this location.
- 4.5.16 Both sites allocated for surgery use realise positive assessments.

**Leisure****L1 – Protection of Formal Open Space and Parkland****Score**

<b>++</b> 2	<b>+</b> 5	<b>○</b> 43	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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**L2 – Allocation of Country Parks****Score\***

<b>++</b> 8	<b>+</b> 26	<b>○</b> 66	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

**L3 – Protection of Country Parks****Score**

<b>++</b> 4	<b>+</b> 14	<b>○</b> 32	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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**L4 – Formal Leisure Facilities**

**Score\***

++ 0	+ 91	○ 559	+ - 0	- 0	-- 0
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\*Cumulative score for all 13 sites. Individual assessments are contained in Appendix 3.

**L5 – Leisure and Well-Being Centres**

**Score\***

++ 2	+ 16	○ 82	+ - 0	- 0	-- 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

**L6 – Protection of Informal Open Spaces**

**Score**

++ 0	+ 6	○ 44	+ - 0	- 0	-- 0
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4.5.17 All policies within the Leisure topic realise positive results, with all sites assessed as being of benefit to a range of social and environmental factors.

**Tourism**

**TM1 – Tourism Proposals**

**Score\***

++ 0	+ 18	○ 432	+ - 0	- 0	-- 0
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\*Cumulative score for all 9 sites. Individual assessments are contained in Appendix 3.

4.5.18 All sites allocated under TM1 realise positive results, as they are assessed as being of benefit in terms of promoting access to recreational facilities and improving the range of cultural facilities.

**Transportation**

**TR1 – Cycle Routes**

**Score\***

++ 6	+ 10	○ 84	+ - 0	- 0	-- 0
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\*Cumulative score for both routes. Individual assessments are contained in Appendix 3.

**TR2 – New Passenger Service**

**Score\***

++ 2	+ 24	○ 74	+ - 0	- 0	-- 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

**TR3 – Safeguarding Freight Railheads**

**Score\***

++ 0	+ 2	○ 96	+ - 0	- 2	-- 0
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\*Cumulative score for both sites. Individual assessments are contained in Appendix 3.

**TR4 – New Rail Stations**

**Score\***

++ 2	+ 43	○ 152	+ - 0	- 3	-- 0
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\*Cumulative score for all 4 sites. Individual assessments are contained in Appendix 3.

**TR5 – Park and Ride Facilities: Rail****Score\***

<b>++</b> 4	<b>+</b> 32	<b>○</b> 164	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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\*Cumulative score for all 4 sites. Individual assessments are contained in Appendix 3.

**TR6 – Park and Ride Facilities: Car Share****Score**

<b>++</b> 1	<b>+</b> 9	<b>○</b> 40	<b>+ -</b> 0	<b>-</b> 0	<b>--</b> 0
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**TR7 – Transport Improvement Schemes****Score\***

<b>++</b> 0	<b>+</b> 64	<b>○</b> 312	<b>+ -</b> 0	<b>-</b> 16	<b>--</b> 8
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\*Cumulative score for all 8 sites. Individual assessments are contained in Appendix 3.

**TR8 – New Roads to Facilitate Development****Score\***

<b>++</b> 0	<b>+</b> 30	<b>○</b> 100	<b>+ -</b> 0	<b>-</b> 18	<b>--</b> 2
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\*Cumulative score for all 3 routes. Individual assessments are contained in Appendix 3.

**TR9 – Regeneration Led Highway Improvements****Score**

<b>++</b> 0	<b>+</b> 10	<b>○</b> 33	<b>+ -</b> 0	<b>-</b> 7	<b>--</b> 0
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- 4.5.19 No sites or routes identified for transport purposes in the Deposit Replacement LDP realise a negative assessment. As expected, sites and routes identified for public transport modes and cycle use all score positively with respect to such issues as accessibility, promoting alternative modes of travel and climate change.
- 4.5.20 Policies TR7, TR8 and TR9 are highway-orientated, therefore negatives are scored in terms of the production of transport emissions and promoting non-car modes of travel. TR8.1 and TR8.2 are concerned with the strategic highway improvements linked to the two strategic sites and realise additional negatives in terms of the effect on landscape, biodiversity and habitat, although amending or removing these elements will have no impact on these factors, bearing in mind the wider context of residential development at these locations. TR9.1 also realises negative results in these same areas as it concerns land currently within the open countryside. However, these highway improvements will ultimately have the effect of increasing capacity and improving the efficiency of the network, thereby having a positive impact in terms of congestion and journey time, which in turn will have social and economic benefits. For this reason, each scheme realises a positive assessment in overall terms.

**Summary**

- 4.5.21 As has been described, each topic area, and most site-specific proposals within them, realise positive results. Appendix 3 contains a site-by-site breakdown of assessments, but the only sites to receive overall negative assessments were the 19 housing sites listed earlier and the two cemetery allocations at Bedwas and Nantgarw.
- 4.5.22 As has been explained, the reason for these negative assessments, in each case, has been the impact on the natural environment. Indeed, such negative effects have also been recorded with regard to sites realising overall positive assessments. Again, the effect of

development on the natural environment is properly considered at planning application stage when it can be looked at in the context of a detailed proposal and protection and mitigation can be considered appropriately.

- 4.5.23 Other sites that were assessed positively overall but received a number of negatives in certain areas were the strategic sites, proposals for retail warehouse parks, certain greenfield employment and school sites and highways-led transport schemes. These negatives were for those factors mentioned in the previous paragraph, as well as transport emissions and the impact on climate change brought about by car use. However, in terms of these latter issues, it is important to consider these sites within the context of the strategy under which they sit, and alongside other proposals which will bring about benefits in these areas, such as principle town centre boundaries and proposals for promoting alternative transport modes. For example, whilst a retail warehouse park may, in reality, be most conveniently serviced by car-borne trips, this will, at the same time, be within the context of a strategy that improves highway efficiency and also seeks to strengthen the role of town centres through the use of complementary policies. Ultimately, there will be a beneficial impact in social, economic and environmental terms.
- 4.5.24 Each site allocated or protected within the Deposit Replacement LDP has been done so on the basis that it has a role in terms of bringing forward the strategy on which the LDP is based, and therefore will have some benefit in a social, economic and/or environmental manner, as is demonstrated by the fact that every site was scored positively for particular ATs. It is considered that each site assessed represents an appropriate and sustainable inclusion within the context of the LDP Strategy, and considered against those measures inherent in the Development Management system to enable potentially detrimental effects of development proposals to be suitably managed and addressed.

## Appendix 1 - Assessment of Countywide Policies

### County-Wide Policies – Results of Assessments

#### CW1 – Climate Change

++	10	+	9	○	48	+ -	0	-	0	--	0
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#### CW2 – Renewable and Low Carbon Energy in New Development

++	6	+	4	○	57	+ -	0	-	0	--	0
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#### CW3 – Sustainable Transport, Accessibility and Social Inclusion

++	7	+	13	○	46	+ -	1	-	0	--	0
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#### CW4 - Amenity

++	0	+	1	○	64	+ -	0	-	2	--	0
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#### CW5 – Design Considerations: Highways

++	3	+	3	○	61	+ -	0	-	0	--	0
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#### CW6 – Natural Heritage Protection

++	5	+	10	○	45	+ -	2	-	5	--	0
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#### CW7 – Protection of the Water Environment

++	5	+	4	○	56	+ -	0	-	2	--	0
----	---	---	---	---	----	-----	---	---	---	----	---

#### CW8 – Trees, Woodlands and Hedgerows Protection

++	6	+	6	○	54	+ -	1	-	0	--	0
----	---	---	---	---	----	-----	---	---	---	----	---

#### CW9 – Protection of Open Space

++	5	+	13	○	46	+ -	1	-	2	--	0
----	---	---	----	---	----	-----	---	---	---	----	---

#### CW10 – Protection of Community and Leisure Facilities

++	6	+	9	○	52	+ -	0	-	0	--	0
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#### CW11 – Protection of Rural Commercial Facilities

++	2	+	8	○	57	+ -	0	-	0	--	0
----	---	---	---	---	----	-----	---	---	---	----	---

#### CW12 – Leisure and Open Space Provision

++	7	+	14	○	46	+ -	0	-	0	--	0
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**CW13 – Affordable Housing Planning Obligation**

++ 4	+ 7	○ 56	+ - 0	- 0	-- 0
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**CW14 – Affordable Housing Exception Sites**

++ 4	+ 6	○ 52	+ - 0	- 4	-- 1
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**CW15 – Creating Sustainable Communities: Housing for Older People**

++ 2	+ 8	○ 57	+ - 0	- 0	-- 0
------	-----	------	-------	-----	------

**CW16 – Use Class Restrictions: Business and Industry**

++ 1	+ 15	○ 47	+ - 0	- 4	-- 0
------	------	------	-------	-----	------

**CW17 – Use Class Restrictions: Retail**

++ 3	+ 6	○ 53	+ - 1	- 4	-- 0
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**CW18 – Use Class Restrictions: Retail Warehouse Parks**

++ 6	+ 10	○ 50	+ - 1	- 0	-- 0
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**CW19 – General Locational Constraints**

++ 0	+ 14	○ 53	+ - 0	- 0	-- 0
------	------	------	-------	-----	------

**CW20 – Locational Constraints: Retailing**

++ 3	+ 7	○ 53	+ - 1	- 3	-- 0
------	-----	------	-------	-----	------

**CW21 – Locational Constraints: Retail Warehousing**

++ 0	+ 0	○ 58	+ - 1	- 5	-- 3
------	-----	------	-------	-----	------

**CW22 – Locational Constraints: Housing for People in Need of Care**

++ 2	+ 9	○ 56	+ - 0	- 0	-- 0
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**CW23 – Locational Constraints: Rural Development and Diversification**

++ 1	+ 11	○ 43	+ - 5	- 6	-- 1
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**CW24 – Locational Constraints: Conversion, Extension and Replacement of Buildings in the Countryside**

++ 1	+ 3	○ 63	+ - 0	- 0	-- 0
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**CW25 – Locational Constraints: Gypsy and Traveller Caravan Sites**

++ 1	+ 9	○ 56	+ - 1	- 0	-- 0
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**CW26 – Locational Constraints: Minerals**

++ 0	+ 8	● 59	+ - 0	- 0	-- 0
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**CW27 – Locational Constraints: Mineral Site Buffer Zones**

++ 0	+ 8	● 59	+ - 0	- 0	-- 0
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**Total**

++ 90	+ 215	● 1447	+ - 15	- 37	-- 5
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## Appendix 2 - Assessment of Site Allocations and Designations

### Site Allocations and Designations – Summary of Results

#### Strategic Sites

MVC1	++ 9	+ 4	⊙ 23	+ - 5	- 1	-- 8
SCC1	++ 9	+ 5	⊙ 21	+ - 6	- 1	-- 8

#### SI1 - Settlement Identity - Green Wedges

SI1	++ 2	+ 6	⊙ 42	+ - 0	- 0	-- 0
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#### NH1 - Conservation of Natural Heritage - Special Landscape Areas

NH1	++ 3	+ 6	⊙ 41	+ - 0	- 0	-- 0
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#### NH2 - Visually Important Local Landscapes

NH2	++ 2	+ 4	⊙ 44	+ - 0	- 0	-- 0
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#### NH3 - Sites of Importance for Nature Conservation

NH3	++ 4	+ 0	⊙ 46	+ - 0	- 0	-- 0
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#### MW1 - Minerals and Waste Handling - Minerals and Waste Handling Site

MW1	++ 0	+ 1	⊙ 49	+ - 0	- 0	-- 0
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#### MN1 - Mineral Site Buffer Zone

MN1	++ 0	+ 77	⊙ 473	+ - 0	- 0	-- 0
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#### MN2 - Minerals Safeguarding

MN2	++ 0	+ 91	⊙ 559	+ - 0	- 0	-- 0
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#### H1 - Housing

H1.1	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.2	++ 4	+ 3	⊙ 38	+ - 2	- 1	-- 2
H1.3	++ 1	+ 6	⊙ 36	+ - 1	- 6	-- 0
H1.4	++ 5	+ 4	⊙ 37	+ - 1	- 1	-- 2
H1.5	++ 4	+ 3	⊙ 35	+ - 1	- 5	-- 2
H1.6	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0

H1.7	++ 1	+ 6	⊙ 36	+ - 1	- 6	-- 0
H1.8	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.9	++ 1	+ 7	⊙ 37	+ - 1	- 4	-- 0
H1.10	++ 1	+ 10	⊙ 37	+ - 0	- 2	-- 0
H1.11	++ 1	+ 6	⊙ 39	+ - 0	- 4	-- 0
H1.12	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.13	++ 1	+ 6	⊙ 40	+ - 0	- 3	-- 0
H1.14	++ 4	+ 3	⊙ 33	+ - 1	- 8	-- 1
H1.15	++ 3	+ 4	⊙ 28	+ - 1	- 12	-- 2
H1.16	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.17	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.18	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.19	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.20	++ 1	+ 6	⊙ 36	+ - 0	- 7	-- 0
H1.21	++ 1	+ 6	⊙ 37	+ - 0	- 6	-- 0
H1.22	++ 1	+ 6	⊙ 33	+ - 1	- 9	-- 0
H1.23	++ 1	+ 8	⊙ 38	+ - 0	- 3	-- 0
H1.24	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.25	++ 1	+ 6	⊙ 38	+ - 1	- 4	-- 0
H1.26	++ 1	+ 6	⊙ 34	+ - 1	- 8	-- 0
H1.27	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.28	++ 1	+ 9	⊙ 37	+ - 0	- 2	-- 1
H1.29	++ 4	+ 3	⊙ 33	+ - 1	- 3	-- 6
H1.30	++ 1	+ 8	⊙ 38	+ - 0	- 3	-- 0
H1.31	++ 1	+ 6	⊙ 34	+ - 1	- 8	-- 0
H1.32	++ 1	+ 6	⊙ 37	+ - 1	- 5	-- 0
H1.33	++ 1	+ 6	⊙ 35	+ - 1	- 7	-- 0

H1.34	++ 1	+ 6	⊙ 34	+ - 0	- 7	-- 2
H1.35	++ 1	+ 6	⊙ 34	+ - 0	- 9	-- 0
H1.36	++ 1	+ 9	⊙ 38	+ - 0	- 2	-- 0
H1.37	++ 1	+ 6	⊙ 33	+ - 1	- 9	-- 0
H1.38	++ 1	+ 6	⊙ 34	+ - 0	- 5	-- 4
H1.39	++ 1	+ 6	⊙ 34	+ - 0	- 5	-- 4
H1.40	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.41	++ 1	+ 7	⊙ 36	+ - 1	- 4	-- 1
H1.42	++ 1	+ 9	⊙ 38	+ - 0	- 2	-- 0
H1.43	++ 4	+ 6	⊙ 38	+ - 0	- 1	-- 1
H1.44	++ 1	+ 9	⊙ 38	+ - 0	- 2	-- 0
H1.45	++ 1	+ 8	⊙ 34	+ - 1	- 6	-- 0
H1.46	++ 1	+ 9	⊙ 38	+ - 0	- 2	-- 0
H1.47	++ 4	+ 6	⊙ 38	+ - 0	- 2	-- 0
H1.48	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.49	++ 1	+ 6	⊙ 33	+ - 0	- 7	-- 3
H1.50	++ 1	+ 8	⊙ 38	+ - 0	- 3	-- 0
H1.51	++ 1	+ 9	⊙ 37	+ - 0	- 3	-- 0
H1.52	++ 1	+ 9	⊙ 36	+ - 0	- 4	-- 0
H1.53	++ 1	+ 9	⊙ 37	+ - 0	- 3	-- 0
H1.54	++ 1	+ 6	⊙ 36	+ - 1	- 6	-- 0
H1.55	++ 1	+ 7	⊙ 40	+ - 0	- 2	-- 0
H1.56	++ 1	+ 8	⊙ 37	+ - 0	- 4	-- 0
H1.57	++ 1	+ 8	⊙ 36	+ - 1	- 4	-- 0
H1.58	++ 1	+ 8	⊙ 38	+ - 0	- 3	-- 0
H1.59	++ 1	+ 6	⊙ 34	+ - 0	- 6	-- 3
H1.60	++ 1	+ 6	⊙ 34	+ - 0	- 6	-- 3

H1.61	++ 1	+ 8	⊙ 38	+ - 0	- 3	-- 0
H1.62	++ 4	+ 3	⊙ 32	+ - 0	- 2	-- 9
H1.63	++ 1	+ 6	⊙ 34	+ - 0	- 9	-- 0
H1.64	++ 4	+ 4	⊙ 30	+ - 1	- 7	-- 4
H1.65	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.66	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.67	++ 6	+ 5	⊙ 35	+ - 0	- 3	-- 1
H1.68	++ 1	+ 6	⊙ 41	+ - 0	- 2	-- 0
H1.69	++ 1	+ 10	⊙ 37	+ - 0	- 2	-- 0
H1.70	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.71	++ 1	+ 6	⊙ 33	+ - 1	- 6	-- 3
H1.72	++ 1	+ 6	⊙ 40	+ - 0	- 3	-- 0
H1.73	++ 6	+ 3	⊙ 36	+ - 1	- 3	-- 1
H1.74	++ 1	+ 8	⊙ 39	+ - 0	- 2	-- 0
H1.75	++ 1	+ 6	⊙ 34	+ - 1	- 8	-- 0
H1.76	++ 7	+ 3	⊙ 38	+ - 0	- 0	-- 2

**E1 - Employment - Employment Allocations**

E1.1	++ 10	+ 8	⊙ 27	+ - 1	- 4	-- 0
E1.2	++ 10	+ 8	⊙ 27	+ - 2	- 3	-- 0
E1.3	++ 6	+ 7	⊙ 23	+ - 3	- 1	-- 10
E1.4	++ 8	+ 9	⊙ 30	+ - 1	- 2	-- 0
E1.5	++ 8	+ 9	⊙ 30	+ - 1	- 2	-- 0
E1.6	++ 8	+ 9	⊙ 30	+ - 1	- 2	-- 0
E1.7	++ 8	+ 9	⊙ 30	+ - 1	- 2	-- 0
E1.8	++ 7	+ 7	⊙ 23	+ - 2	- 6	-- 5
E1.9	++ 9	+ 10	⊙ 29	+ - 0	- 2	-- 0
E1.10	++ 10	+ 9	⊙ 30	+ - 0	- 1	-- 0

E1.11	++ 5	+ 11	⊙ 27	+ - 1	- 6	-- 0
E1.12	++ 11	+ 10	⊙ 28	+ - 0	- 1	-- 0

**E2 - Employment Sites Protection**

E2.1	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.2	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.3	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.4	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.5	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.6	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.7	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.8	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.9	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.10	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.11	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.12	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.13	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.14	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.15	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.16	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.17	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.18	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.19	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.20	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.21	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.22	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.23	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.24	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0



E2.25	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.26	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.27	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.28	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.29	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.30	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.31	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.32	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.33	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.34	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0
E2.35	++ 3	+ 14	⊙ 32	+ - 0	- 1	-- 0

**C1 - Commercial Development - Principal Town Centre Boundary**

C1.1	++ 3	+ 5	⊙ 41	+ - 1	- 0	-- 0
C1.2	++ 3	+ 5	⊙ 41	+ - 1	- 0	-- 0
C1.3	++ 3	+ 5	⊙ 41	+ - 1	- 0	-- 0
C1.4	++ 3	+ 5	⊙ 39	+ - 3	- 0	-- 0
C1.5	++ 3	+ 5	⊙ 41	+ - 1	- 0	-- 0

**C2 - Primary Retail Areas**

C2.1	++ 3	+ 5	⊙ 41	+ - 1	- 0	-- 0
C2.2	++ 3	+ 5	⊙ 39	+ - 3	- 0	-- 0

**C3 - Retail Warehouse Parks**

C3.1	++ 0	+ 7	⊙ 38	+ - 1	- 4	-- 0
C3.2	++ 0	+ 7	⊙ 37	+ - 2	- 4	-- 0

**Commercial Opportunity Areas**

C4.1	++ 5	+ 12	⊙ 32	+ - 1	- 0	-- 0
C4.2	++ 5	+ 12	⊙ 32	+ - 1	- 0	-- 0
C4.3	++ 5	+ 11	⊙ 33	+ - 1	- 0	-- 0

C4.4	++ 4	+ 13	⊙ 32	+ - 1	- 0	-- 0
C4.5	++ 4	+ 13	⊙ 32	+ - 1	- 0	-- 0
C4.6	++ 4	+ 12	⊙ 33	+ - 1	- 0	-- 0
C4.7	++ 4	+ 12	⊙ 26	+ - 1	- 7	-- 0
C4.8	++ 4	+ 13	⊙ 32	+ - 1	- 0	-- 0
C4.9	++ 4	+ 14	⊙ 30	+ - 1	- 1	-- 0
C4.10	++ 4	+ 14	⊙ 30	+ - 1	- 1	-- 0

**CF1 - Community Facilities - Cemeteries**

CF1.1	++ 0	+ 3	⊙ 45	+ - 0	- 2	-- 0
CF1.2	++ 0	+ 3	⊙ 45	+ - 0	- 2	-- 0
CF1.3	++ 0	+ 3	⊙ 45	+ - 0	- 2	-- 0
CF1.4	++ 0	+ 3	⊙ 44	+ - 0	- 2	-- 1
CF1.5	++ 0	+ 2	⊙ 44	+ - 1	- 3	-- 0
CF1.6	++ 0	+ 2	⊙ 44	+ - 1	- 3	-- 0

**CF2 - Schools**

CF2.1	++ 2	+ 11	⊙ 37	+ - 0	- 0	-- 0
CF2.2	++ 2	+ 9	⊙ 39	+ - 0	- 0	-- 0
CF2.3	++ 2	+ 9	⊙ 39	+ - 0	- 0	-- 0
CF2.4	++ 2	+ 11	⊙ 37	+ - 0	- 0	-- 0
CF2.5	++ 2	+ 11	⊙ 36	+ - 0	- 1	-- 0
CF2.6	++ 2	+ 11	⊙ 37	+ - 0	- 0	-- 0
CF2.7	++ 2	+ 12	⊙ 28	+ - 1	- 7	-- 0
CF2.8	++ 2	+ 11	⊙ 36	+ - 0	- 1	-- 0
CF2.9	++ 2	+ 12	⊙ 35	+ - 0	- 1	-- 0

**CF3 - GP Surgeries**

CF3.1	++ 1	+ 10	⊙ 39	+ - 0	- 0	-- 0
CF3.2	++ 1	+ 10	⊙ 39	+ - 0	- 0	-- 0

**L1 - Leisure - Protection of Formal Open Space and Parkland**

L1	++ 2	+ 5	⊙ 43	+ - 0	- 0	-- 0
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**L2 - Allocation of Country Parks**

L2.1	++ 4	+ 13	⊙ 33	+ - 0	- 0	-- 0
L2.2	++ 4	+ 13	⊙ 33	+ - 0	- 0	-- 0

**L3 - Protection of Country Parks**

L3	++ 4	+ 14	⊙ 32	+ - 0	- 0	-- 0
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**L4 - Formal Leisure**

L4.1	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.2	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.3	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.4	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.5	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.6	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.7	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.8	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.9	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.10	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.11	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.12	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0
L4.13	++ 0	+ 7	⊙ 43	+ - 0	- 0	-- 0

**L5 - Leisure and Well-Being Centres**

L5.1	++ 1	+ 8	⊙ 41	+ - 0	- 0	-- 0
L5.2	++ 1	+ 8	⊙ 41	+ - 0	- 0	-- 0

**L6 - Protection of Informal Open Spaces**

L6	++ 0	+ 6	⊙ 44	+ - 0	- 0	-- 0
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**TM1 - Tourism - Tourism Proposals**

TM1.1	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.2	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.3	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.4	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.5	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.6	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.7	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.8	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0
TM1.9	++ 0	+ 2	⊙ 48	+ - 0	- 0	-- 0

**TR1 (National) - Transportation - Cycle Routes**

TR1	++ 3	+ 5	⊙ 42	+ - 0	- 0	-- 0
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**TR1 (Local) - Transportation - Cycle Routes**

TR1	++ 3	+ 5	⊙ 42	+ - 0	- 0	-- 0
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**TR2 - New Passenger Service**

TR2.1	++ 1	+ 12	⊙ 37	+ - 0	- 0	-- 0
TR2.2	++ 1	+ 12	⊙ 37	+ - 0	- 0	-- 0

**TR3 - Safeguarding Freight Railheads**

TR3.1	++ 0	+ 1	⊙ 48	+ - 0	- 1	-- 0
TR3.2	++ 0	+ 1	⊙ 48	+ - 0	- 1	-- 0

**TR4 - New Rail Stations**

TR4.1	++ 1	+ 11	⊙ 38	+ - 0	- 0	-- 0
TR4.2	++ 0	+ 10	⊙ 40	+ - 0	- 0	-- 0
TR4.3	++ 1	+ 12	⊙ 34	+ - 0	- 3	-- 0
TR4.4	++ 0	+ 10	⊙ 40	+ - 0	- 0	-- 0

**TR5 - Park and Ride Facilities: Rail**

TR5.1	++ 1	+ 8	⊙ 41	+ - 0	- 0	-- 0
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TR5.2	++ 1	+ 8	⊙ 41	+ - 0	- 0	-- 0
TR5.3	++ 1	+ 8	⊙ 41	+ - 0	- 0	-- 0
TR5.4	++ 1	+ 8	⊙ 41	+ - 0	- 0	-- 0

**TR6 - Park and Ride Facilities: Car Share**

TR6	++ 1	+ 9	⊙ 40	+ - 0	- 0	-- 0
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**TR7 - Transport Improvement Schemes**

TR7.1	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.2	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.3	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.4	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.5	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.6	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.7	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1
TR7.8	++ 0	+ 8	⊙ 39	+ - 0	- 2	-- 1

**TR8 - New Roads to Facilitate Development**

TR8.1	++ 0	+ 9	⊙ 33	+ - 0	- 7	-- 1
TR8.2	++ 0	+ 11	⊙ 31	+ - 0	- 7	-- 1
TR8.3	++ 0	+ 10	⊙ 36	+ - 0	- 4	-- 0

**TR9 - Regeneration Led Highway Improvements**

TR9	++ 0	+ 10	⊙ 33	+ - 0	- 7	-- 0
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