

Deposit Replacement Caerphilly County Borough  
Local Development Plan

**Strategic Environmental Assessment /  
Sustainability Appraisal**

Report of Pre-Deposit Consultation

November 2015

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## Document 3 – Assessment of Preferred & Alternative Strategies

<b>Representor:</b>	Mr Andrew Kibble		
<b>Chapter:</b>	6	<b>Para/Ref:</b>	Page 29
		<b>Type:</b>	Comment

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### Summary Of Comment

There is no evidence to support the assessment response that growth in the SCC will benefit air quality.

### Representation

The SEA strategy suggests that targeting growth at the Southern Connections Corridor will have positive benefits on air quality (page 29). No actual data is presented to support this position and it appears to be based on limited predictions on the impacts of the southern by-pass would have on air quality and traffic congestion.

Caerphilly Town Centre Air Quality Action Plan has started to examine the potential benefits of the southern by-pass. However, the Council's own modelled predictions suggests it would make, at most, some "modest" improvements in air quality. It is important to appreciate that these predictions were based on data from 2009 and therefore do not consider the implications of the construction of hundreds of new homes. It is therefore unlikely that the southern by-pass will significantly improve air quality or reduce the number of vehicles in Caerphilly since the vast majority of the new homes will be built in and around Caerphilly centre and people will still have to use existing congested roads such as Mountain Road, St Martins Road and the High Street to commute and move in and around the town. It is incorrect to suggest in the SEA or LDP that the southern by-pass will reduce air quality when many of the proposed homes will not be directly served by the by-pass. Any future assessment of the air quality benefits of construction of a bypass to the south-east of Caerphilly needs to consider the implications of the new homes proposed in LDP. At the moment the benefits of the southern by-pass are unclear and have not been properly evaluated. As a result it is impossible to state with any certainty that the by-pass and new housing developments will improve air quality in Caerphilly. The council has a legal duty to properly assess the impacts of these developments on air quality prior to any planning decision. Until this work has been properly undertaken and consulted upon, no decision should be taken on the LDP.

### Representor's Change

Better and more detailed modelling of the impacts of new housing development on traffic and air quality in Caerphilly Town Centre. At present the LDP and accompanying SEA provides no evidence to support the suggestion that the LDP will improve air quality in the SCC and especially in and around Caerphilly Town Centre. Until evidence is provided to the contrary, the SEA and LDP fails to demonstrate that the proposed redevelopment in the Southern Connections Corridor will protect the environment and public health.

More consideration on the impacts of housing developments on surface water flooding is needed as the LDP contains several proposals to develop steep sides greenfield sites which provide considerable drainage and protection from surface water runoff.

The visual impact of developing greenfield land also needs further evaluation. Caerphilly Mountain provides an important visual and strategic backdrop to the Town and castle. Further redevelopment of greenfield land on Caerphilly Mountain will have a detrimental impact of the landscape of Caerphilly and further consideration is needed to assess the impact of health and wellbeing and tourism of the long term deterioration of this visually prominent land.

### **Council Response**

This comment is made in respect of Spatial Option 4 – Target Growth to the Southern Connections Corridor. This option is not the Preferred Strategy and is not promoted for the Replacement LDP.

However, the Preferred Strategy also provides for growth in the Caerphilly Basin and, as such, this comment still applies.

The SEA/SA assessment process is strategic level assessment that considers the high level effects of implementing the plan. The Preferred Strategy stage in the LDP process is also the strategic element of that process and, as a result, the results of the assessments are high level responses, and do not reflect specific potential detailed impacts that may occur, as to do this would require more detail regarding sites and their proposed developments than is currently available.

Given the above the SEA/SA assessment result in respect of Assessment Test 10 identifies that the strategy would realise direct positive benefits in respect of air quality. The Assessment Test questions whether the Strategy would promote improvements in air quality, particularly in respect of transport emissions. The Strategy proposes residential growth in the Caerphilly Basin, which would realise Phase 1 of the South East Bypass of Caerphilly, and development located in close proximity to the existing transport interchange at the railway station. The South East Bypass would complete the ring road around Caerphilly and would reduce through traffic in the town centre by offering more commodious alternative routes. In addition the proximity of development to the existing public transport centre will promote increased modal shift to more sustainable forms of transport. All of these will generally reduce car borne transport and therefore reduce transport emission. The Bypass will redirect traffic from the town centre so reducing traffic within the designated Air Quality Management Area, where the impact of transport emissions is most severe.

Consequently it is fair to report that the likely effect of the proposed strategy is to reduce the impact of transport based emissions.

The Representation also contends that there is no information upon which such a result could be based. It is true that at Strategy stage there is little definition and information in respect of the detailed developments that the proposed strategy will generate. However, a multi-disciplinary team was used to undertake the assessments and this provided a broad experience and knowledge base to input into the assessments and the results are considered robust and appropriate for the strategic level.

It should be noted that since the consultation the council has commissioned and received an assessment of the cumulative impact that the proposed development identified in the

Deposit Replacement LDP would have on the strategic highway networks in both the Mid Valleys Corridor and the Caerphilly Basin. This assessment identifies that the provision of Phase 1 of the Bypass will reduce traffic in the town centre when considered against a scenario where there is no development, i.e. the current situation projected to the end of the period. This evidence supports the position that the realisation of the Bypass as part of the development provided by the strategy will have beneficial impacts in respect of air quality in the town centre.

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**Recommendation**

No amendment be made in respect of this representation.

## Document 3 – Assessment of Preferred & Alternative Strategies

<b>Representor:</b>	5268 Mr Gareth Jones				
<b>Chapter:</b>	6	<b>Para/Ref:</b>	Page 29	<b>Type:</b>	Comment

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### Summary Of Comment

There should be incentives to use the Bypass to reduce diesel pollution in the town centre.

### Representation

Recently, Paris has had to ban odd numbered cars, mainly due to diesel PM2.5 pollution. Caerphilly centre, and other areas, are hazardous to pedestrians in the rush hour. Incentives to use the by-passes, such as speed bumps in the centre, and forcing people to turn off their engines at traffic lights would help. Long-term, particulate filters, or replacement of diesel cars and lorries by electric vehicles would help, as is already under consideration in Central London. Longer, faster electric trains would help get people off the roads, as would a congestion charge to drive over the mountain into Cardiff.

### Representor's Change

Promote use of speed bumps, engine management and particulate filters to reduce emissions and promote electric trains and a congestion charge to reduce traffic.

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### Council Response

The LDP addresses land use issues within the county borough. The measures proposed by the Representor are not land used based and, as such, cannot be addressed through the Replacement LDP.

However, the measures are important in respect of reducing transport emissions, particularly in respect of Caerphilly Town Centre which has been designated as an Air Quality Management Area (AQMA) due to air quality issues associated with traffic. The Welsh Government approved the Air Quality Action Plan (AQAP) for the town centre AQMA early in 2014. The AQAP sets out a raft of measures, termed interventions, that seek to reduce traffic generally and reduce transport emissions, particularly from HGVs and buses. The AQAP identifies short medium and long term interventions that, together, will realise improvements in air quality. The AQAP has considered many of the suggestions raised by the Representor and, whilst a number are not included in the AQAP, the position is being monitored and other interventions will be considered where appropriate.

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### Recommendation

No amendment be made in respect of this representation.

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## Document 3 – Assessment of Preferred & Alternative Strategies

<b>Representor:</b>	1599 Greendoorstep Environmental Group				
<b>Chapter:</b>	6	<b>Para/Ref:</b>	2.26 – 2.43	<b>Type:</b>	Comment

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### Summary Of Comment

Greenfield development in the Caerphilly Basin will have detrimental impacts..

### Representation

Southern Connections Corridor

We agree developing greenfield sites in the Caerphilly Basin will:

1. alter the character of the Caerphilly town in terms of its cultural identity(in our opinion adversely) [2.26]
2. not offer social or economic benefits to the County as a whole, would bring about significant environmental disbenefits and not acceptable in sustainability terms[2.27]
3. have a detrimental environmental impact, the fact that the north of the county will not be prioritised leads to social and economic negatives and the viability of settlements will not be sustained [2.28]
4. have a detrimental environmental impact [2.40]
5. have little impact on the MVC and in particularly the HOVRA, failing to have social and economic benefits where they are most needed [2.42]

### Representor's Change

None

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### Council Response

The support is noted, although the comments relate to Spatial Options 3 and 4. Neither Option has been identified as the Preferred Strategy and neither has been used for the Deposit Replacement LDP.

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### Recommendation

No amendment be made in respect of this representation.

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