

Deposit Replacement Caerphilly County Borough
Local Development Plan up to 2031

INITIAL CONSULTATION REPORT (PREFERRED STRATEGY)

JANUARY 2016

Amnewidiad Adneuo Cynllun Datblygu Lleol
Bwrdeistref Sirol Caerffili Hyd at 2031

ADRODDIAD YMGYNGHOROL CYCHWYNNOL (Y STRATEGAETH A FFEFRIR)

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**DEPOSIT REPLACEMENT CAERPHILLY COUNTY BOROUGH
LOCAL DEVELOPMENT PLAN UP TO 2031
INITIAL CONSULTATION REPORT**

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1. Introduction

- 1.1 This document represents the Initial Consultation Report that the Council is required to prepare for the purposes of Regulation 16 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 as amended by The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.
- 1.2 In accordance with the LDP Regulations, the Report identifies:
 - (a) Bodies engaged or consulted at the pre-deposit public consultation stage;
 - (b) The main issues raised, and how they have influenced the preparation of the Deposit Replacement Local Development Plan up to 2031 (Deposit Replacement LDP)
 - (c) The steps taken to publicise plan preparation, and how this complies with the Community Involvement Scheme contained in the Delivery Agreement
 - (d) The total number of representations received pursuant to LDP Regulation 16

2. Compliance with the Delivery Agreement

- 2.1 The Delivery Agreement (DA) for the Caerphilly County Council Deposit Replacement Local Development Plan commits the Council to producing the Replacement LDP according to the timescales laid down by the Timetable and in accordance with the consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA.
- 2.2 The timetable contained within the DA has been followed as far as the requirements of Regulation 14, Pre-Deposit Participation. The Pre-Deposit Public Consultation was delayed by 3 months to allow the Council to prepare a Review Report, requested by Welsh Government, detailing what consideration has been given to the preparation of a Joint Review with neighbouring planning authorities, specifically Blaenau Gwent and Torfaen and to allow the Council sufficient time to complete the work necessary to inform the Preferred Strategy. Whilst the timetable has slipped at Pre-Deposit Stage, the target adoption date of September / October 2017 remains the same as due to changes in the plan preparation process the Council is no longer required to undertake an Alternative Sites Stage. A revised timetable has been submitted to Welsh Government for approval.
- 2.3 The consultation processes contained within the Community Involvement Scheme (CIS) have been followed.

3. Consultation Bodies

- 3.1 The Consultation Database contains at any time the details of all the interested persons and bodies who wish to be consulted during the preparation of the LDP.

- 3.2 The list is of course continually changing, but an indication of a range of bodies that were consulted in the early stages of the preparation of the Deposit Replacement LDP is indicated by the lists of consultation bodies at the start of the process as detailed in the Delivery Agreement.

4. Management Groups

- 4.1 The Council has utilised three established management groups to assist in the preparation of the Deposit Replacement LDP and speed up decision-making. The Terms of Reference of the Groups, together with the Minutes of each of the meetings have been made available on the Council's web site throughout the process.

The LDP Focus Group

- 4.2 The LDP Focus Group is an internal group of senior officers and elected members of the Council that has responsibility for overseeing all the stages involved in the preparation of the Deposit Replacement LDP.

The Stakeholder Panel

- 4.3 The Stakeholder Panel consists of residents of the county borough and representatives of a wide range of local groups and organisations to ensure that a cross section of views can be debated as part of the public participation into the preparation of the Replacement LDP.

The Sustainability Group

- 4.4 The Sustainability Group is a group of experts from both inside the Council and external bodies that advises on environmental impact and the sustainability of proposals arising during the preparation of the Deposit Replacement LDP.

5. Community Involvement in the Pre-Deposit Process

- 5.1 Community involvement is a fundamental feature in the plan preparation process, and is intended to achieve consensus throughout the preparation of the Deposit Replacement LDP. The Community Involvement Scheme (CIS) in the Delivery Agreement details the ways in which the Council has sought to secure this involvement.
- 5.2 The LDP Focus Group met on six occasions during the Pre-Deposit process, as follows:
19 July 2013; 29 April 2014; 4 November 2014; 20 July 2015; 22 October 2015 and 24 November 2015.
- 5.3 The Stakeholder Panel met on the 23 June 2014 to consider the Vision and Objectives, the level of growth for the County Borough and alternative spatial options.

- 5.4 The Sustainability Group met on 6 occasions, as follows: 11 March 2014; 8 July 2014; 29 July 2014; 7 February 2014; 3 February 2015 and 26 May 2015.
- 5.5 The minutes of all the Management Group meetings have been made available on the Council's Website.
- 5.6 In addition, in accordance with the Delivery Agreement there was consultation on the Scoping Report for the Strategic Environmental Assessment/ Sustainability Assessment (SEA/SA) between 9 May 2014 – 13 June 2014: this consultation was restricted to the Statutory Consultation Bodies.

6. The Pre-Deposit Consultation

- 6.1 In accordance with the Regulations, consultation on the Pre-Deposit documents, including the SEA/SA, was carried out for the six-week period between 11 February 2015 to 24 March 2015. The consultation documents were made available at the Council's Planning Offices, at all public libraries in the County Borough, and on the Council's Website. Public exhibitions were held between 16 February 2015 and the 21 March 2015.
- 6.2 The Draft Preferred Strategy consultation document identified the key land use issues for the County Borough that the Plan sought to address the Vision for the County Borough up to 2031 together with draft aims and objectives to achieve that Vision, the five alternative spatial options considered and importantly it outlined the Council's Preferred Development Strategy for the future development of the area.
- 6.3 The Draft Preferred Strategy identified two significant areas of change within the County Borough where significant growth was to be proposed, specifically Maseycwmm in the Mid Valley Corridor and South East Caerphilly in the Southern Connections Corridor and thus proposed two strategic sites as follows:
- NCC1 Gwernau Ganol and Gwernau Fawr Farm, Maesycwmm (Parc Gwernau); and
 - SCC1 Former Ness Tar Plant and Adjoining Land.
- 6.4 The SEA/SA documents consisted of the following:
- (a) The Scoping Report
 - (b) The Review of Relevant Plans, Programmes, and Policies; and
 - (c) The Assessment of the Preferred and Alternative Strategies
- 6.5 In addition to these documents, the Council also published the Candidate Sites Register, together with the initial assessments that had been made of their suitability for development and of their compatibility with the Preferred Strategy. The Council invited residents to comment on the Candidate Sites.

- 6.6 In an attempt to engage as wide an audience as possible in the Pre-Deposit public consultation exercise, the Council used a variety of means of communication as outlined in the CIS. The consultation methods used included:
- Letter / Email
 - Statutory Consultees: In total, 95 letters and emails were sent out
 - General Consultees: In total, 3,231 letters were sent out to general consultees and 380 emails
 - Councillors & Community Councillors – all were sent an email or letter notifying of the Pre-Deposit consultation.
 - Advertisements
 - Statutory Notices were placed in the Western Mail & Campaign on 11 February 2015
 - Article was placed in the Caerphilly Observer on 19 February 2015 entitled 'Have Your Say on Planning Blueprint'
 - Article in the Argus on 11 February 2015 'Give your views on Planning Blueprint'
 - Newline article in December 2014 and March 2015 alerting residents to the consultation and the deadline of 24 March 2015.
 - Poster Campaign
 - Displayed within all libraries, customer service centres and Post Offices across the County Borough and selected shops.
 - Website & Social Media Promotion
 - Home Page of Caerphilly Council webpage, live from 11 February 2015
 - Facebook posts (27 February 2015, 2 March 2015, 19 March 2015)
 - Twitter posts (27 February 2015, 19 March 2015)
 - Consultation material made available on the Council's website
 - Exhibitions
 - Mobile exhibitions held across the County Borough in the settlements of Caerphilly, Ystrad Mynach, Risca, Bargoed, Maesycwmmmer, Blackwood and Rhymney
 - Static exhibition based at the reception of the Council Offices, Pontllanfraith
- 6.7 People were requested to make representations to the Preferred Strategy to the Council in writing or via an online form. To assist consultees in the Pre-Deposit Consultation, two representation forms were used, i.e. one for the Preferred Strategy documents and one for the SEA/SA documents. These representation forms are shown in Appendix 1. However, residents were also advised that a letter would also be acceptable.

7. Responses to the Consultation

- 7.1 A total of **6840** representations were received during the statutory consultation period. The initial assessment of the representations indicated that:

- 7.2 There were 3 notable petitions in terms of numbers. There were 3129 signatures to a petition concerning the possible development of the Ness Tar Site and Nant y Calch Farm; 453 signatures to a petition in respect of Gwern y Domen; and 323 signatures to a petition in respect of Land West of Cefn Llwyna Farm (It is worth noting that these are each counted as one representation).
- 7.3 The publication of the Candidate Sites Register unsurprisingly also generated a large number of responses in relation to individual sites; chief among these were
- Maesycwmmmer (47 responses – 5 support, 29 Objections, 13 comments);
 - Ness Tar at Caerphilly (129 responses- 5 support, 114 Objections, 10 comments);
 - Gwern y Domen (31 responses - 1 support, 29 Objections, 1 comment);
 - Hendredenny (15 responses - 1 support, 13 Objections, 1 comment);
 - Pandy Road Bedwas (22 responses- 2 support, 17 Objections, 3 comments);
 - Land at West of Cefn Llwyna Farm, Penallta (Peny Bryn) (195 responses all objections); and
 - Snowdon Close Risca (33 responses – 31 Objections, 2 comments).
- 7.4 Of the remainder, a significant number of representations were received from proposers of candidate sites, disappointed by the poor scoring of their site in the Council's initial assessment; seeking to change the boundary of their Candidate Site; or seeking to submit a new site.
- 7.5 40 new Candidate Sites were proposed through representations to the Preferred Strategy
- 7.6 Finally, although small in number, there were significant comments received from Welsh Government, Statutory Bodies and Commercial Organisations on the Preferred Strategy itself and a small number of responses to the Strategic Environmental Assessment / Sustainability Appraisal.
- 7.7 Whilst many of those listed in the first 4 bullet points above were single issue representations, the particular responses described by the last bullet point raised many more individual issues and were far more complicated in scope and depth. Detailed responses to these representations made on the Draft Preferred Strategy are contained within Annex 1 of this Report.
- 7.8 In cases where representations have been accepted by the Council, efforts have been made to identify the parts of the Deposit Replacement LDP that reflect the representation; however, since the Deposit Replacement LDP is not simply a revision of the Preferred Strategy, but rather a new document, this has not always been possible. However, every comment received has been given due consideration.

- 7.9 Annex 4 contains a summary of representations made to Candidate Sites. Annex 4(a) contains a list of Candidate Sites that received no representations, where as Annex 4(b) contains a summary response of those sites that received representations either in support / objection or a general comment. These Annexes do not contain the Council's response to the representations. The Consultation on the Preferred Strategy was not primarily concerned with Candidate Site assessments although the Sites Register was published as part of the consultation. Representations relating to Candidate Sites that raise particular matters of concern, due consideration has been given to the issues raised, for example in respect of ecology, drainage, access, etc. in the plan preparation process for the Deposit Replacement LDP. Where sites have been deemed to be in accordance with the strategy, suitable for a particular use and deliverable, they have been formally allocated within the Deposit Replacement LDP.
- 7.10 Detailed responses to the representations made on the SEA/SA documents are contained in Annex 2 to this Report.

8. The preparation of the Deposit Replacement LDP

- 8.1 The representations received during the Preferred Strategy Consultation have been taken into account in the preparation of the Deposit Replacement LDP. As previously noted, given that the Draft Preferred Strategy is not a complete draft plan, there might be difficulties identifying where representations have been taken into account in the Deposit Replacement LDP. It must also be noted that whilst the Council may consider that representations have been taken into account, representors may disagree.
- 8.2 The Council published the Candidate Site Register in tandem with the Preferred Strategy to afford residents and other stakeholders an opportunity to make comment on those sites of interest to them. Unsurprisingly a considerable number of representations were received in response to Candidate Sites. These representations have been considered and taken into account as part of the site allocation selection process for the Deposit Replacement LDP. It is important to note however that whilst local views must be considered, the duty is to decide each site on its planning merits. As a general principle, local opposition or support for a proposal is not, on its own, a reasonable ground for rejecting a site; objections, or support, must be based on valid planning considerations.

9. Equality Impact Assessment

- 9.1 The Equality Impact Assessment (EIA) has been developed by Caerphilly County Borough Council as part of its statutory duty and moral commitments. The aim of the EIA is to ensure that Equalities issues have been consciously

considered throughout the decision making processes of the work undertaken by every service area of the Council and work undertaken at a corporate level.

- 9.2 The EIA exists to ensure that no individuals or groups are discriminated against, and helps the Council to meet its legal responsibilities under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Welsh Language Measure 2011. There is also a requirement under Human Rights legislation for Local Authorities to consider Human Rights in developing proposals.
- 9.3 The EIA assessment is designed to gauge the impact of policies and procedures on staff and service users through a checklist of questions. It is not therefore specifically designed for the assessment of Council Strategies, which perhaps require a different approach.
- 9.4 This is particularly the case with the Deposit Replacement LDP, which is the overarching land-use policy statement of the Council. The Deposit Replacement LDP identifies land suitable for all types of development over a 15-year period, and therefore necessarily incorporates the proposals of a number of agencies, including public bodies and statutory undertakers. The Council is obviously not responsible for the strategies of external bodies, or to the extent to which these take equality issues into account in the agencies responsible. However, it has been decided to complete the EIA form to check that the LDP does not discriminate against particular groups, and to identify the positive contribution that the Deposit Replacement LDP makes to the equalities agenda.
- 9.5 In practice, one of the most effective contributions that the Deposit Replacement LDP makes to the equalities agenda lies not in its content, but rather in the plan preparation process. This requires the involvement of a wide range of organisations and individuals, in an effort to achieve consensus on the policies and proposals in the plan. The public consultations on the plan, which are an essential part of the process, are by far the largest consultation exercises carried out by the Council, and differ fundamentally from most of them.
- 9.6 Public consultations on the Deposit Replacement LDP, invite anyone affected or interested in the plan to comment on any aspect of it. These representations are reported in detail to Council, together with an analysis of the issues raised and a proposed response. This analysis is often lengthy and complex, and is made in the knowledge that it can be challenged at a Public Examination.
- 9.7 The significant point of this consultation process for equality issues is that it provides the opportunity for all interested bodies and individuals to examine and comment on all of the land-use implications of the policies and programmes of both the Council and other development agencies, and to receive a detailed response (at least on the planning issues raised) from the Council. This opportunity could play a significant role in progressing equality issues by raising and debating them in a transparent and democratic process.

APPENDIX 1: SUMMARY OF THE MAIN STRATEGY ISSUES RAISED

Many of the representations received as a result of the Pre-Deposit (Preferred Strategy) Consultation, are matters that are not required to be addressed at Pre-Deposit stage and will be addressed fully and in compliance with The Town and Country Planning (Local Development Plan)(Wales) Regulations 2005 as amended by the 2015 Regulations at Deposit Stage.

Overall there has been general acceptance of the main thrust of the Strategy proposed by the Council. Comments have concentrated on detailed points where it has been suggested that improvements and additions to the strategy description and changes to strategy policies would be beneficial. These points have been considered and many of the criticisms are accepted. It is intended that these points form the basis for the revised plan strategy moving forward, which will be completed and presented to the public as part of the Deposit Replacement LDP.

There follows a summary of the key issues raised through the consultation:

Support for the Strategy

- The LDP vision is clear, as is the process of arriving at it.
- The overall vision appears to be well integrated with the Single Integrated Plan.
- The strategy reduces the scale of new housing allocations in the HOVRA to more closely align with market activities and demand, targeting the majority of new development and expansion opportunities within the MVC and SCC and this is supported.
- The strategic options and preferred strategy are broadly relevant to the borough.
- The approach of allocating 2 strategic sites is supported.
- The release of greenfield land for development where it is supported by an integrated transport system, which encourages modal shift and reduces the need for car borne journeys is supported.
- The commitment to retention of open space within development boundaries is to be welcomed.
- The longer-term plans for improved rail infrastructure are supported.
- Support is given for the technical work undertaken to inform the level of growth proposed by the Preferred Strategy

Concern with the Strategy

- The vision is generic with no mention of key places or areas of change; in essence it is not clear how the strategy is reflected in spatial terms.
- The reference to Cardiff Capital Region is inappropriate.
- The level of growth proposed could be higher.
- The role and function of settlements within the three strategy areas are not distinct enough to enable the designations.

- It is unclear how the functional analysis of settlements translates into the release of greenfield land within the SCC.
- There are 41 key aims and objectives many of which appear to be unnecessary duplicated.
- The achievement of many of the LDP's key objectives will be dependent upon development being integrated with the provision of key transport infrastructure.
- The Preferred Strategy should be sufficiently flexible to respond to changes in the economy.
- There needs to be sufficient flexibility within the plan in order to ensure that the level of housing needed over the plan period can be delivered in a timely manner.
- The scale and distribution of sites for development is unclear.
- The strategy is reliant on two strategic sites and concern is raised regarding their deliverability within the plan period.
- There is an over emphasis on development in the Southern Connections Corridor and Caerphilly Basin in particular.
- Brownfield sites should be released in preference to greenfield sites.
- The existing infrastructure cannot support further growth.
- The preferred strategy proposes significant infrastructure, it should be demonstrated that this is financially viable and deliverable.
- Objects to the release of land for strategic sites due to their potential negative environmental impact.

Concern for Particular Aspects of the Strategy

- The Welsh Government has concerns on the limited number of sites that make up the employment provision, in particular the reliance on Oakdale Business Park, which accounts for approximately 72% of all employment land supply in the County Borough.
- Clear evidence should be provided on how mineral supply and safeguarding has affected the development of the preferred strategy and proposals.
- The Council need to explain as to what 'weight' has been given to environmental designations and how the presence (or otherwise) of these designations has informed the preferred strategy and key allocations.
- Measures to support sustainable travel and modal shift are not undermined by the provision of new highway capacity, which could induce additional demand for car journeys.
- The rationale of providing a south east by-pass of Caerphilly Town Centre.
- The preferred strategy should be clearer about the potential amount and location of affordable housing.

Comments on the Draft Strategic Policies

- Strategy Policy 1 - Development Strategy – Development in the Heads of the Valleys Regeneration Area

Include an additional criterion which states 'protect the natural heritage from inappropriate forms of development'

- Strategy Policy 1 - Development Strategy – Development in the Mid Valleys Corridor
Include an additional criterion which states 'protect the natural heritage from inappropriate forms of development'
- Strategy Policy 9 – Place Making
Amend the policy to make reference to green infrastructure and the Water Framework Directive
- Strategy Policy 13: Renewable Energy: Local Areas of Search
 - The Preferred Strategy only contains a policy relating to wind energy schemes, LPAs should plan positively for all forms of renewable energy.
 - The policy requires further qualification to make reference to European and Nationally protected species.
- Strategy Policy 21: Housing Provision Flexibility
This policy is supported, however the flexibility allowance of 9% should be clearly supported by evidence.

Matters to be addressed by the Deposit Replacement LDP:

- The LDP needs to be clear that it is indeed a replacement plan.
- Clarity should be provided on how the strategy has changed compared to the previous LDP in respect of the scale and location of greenfield and brownfield sites within each strategy area.
- The Plan should indicate what sites have been rolled over from the current LDP.
- The Plan should indicate how national policy in respect of flood risk has influenced the scale and location of growth.
- It should demonstrate how the conclusions of the LHMA, and viability work, has influenced the scale and location of growth and the delivery of affordable housing.
- The LPA should demonstrate that it has maximised affordable housing provision .
- Homes brought back into beneficial use through an empty homes strategy, should not provide a net gain in housing supply as the stock is already in existence.
- The Council need to demonstrate delivery of key employment allocations within the plan period.
- The authority needs to demonstrate that all allocations and commitments are financially viable and deliverable within the plan period. .Demonstrating that key infrastructure can be delivered will be fundamental to the strategy. Key timings, phasing, funding mechanisms will be essential to ensure that infrastructure can be delivered in the plan period.
- The Plan should indicate where suitable and appropriate sites exist for the provision of all types of waste management facilities in order to provide some certainty for waste operators interested in fulfilling demand in an area.
- Should make provision to meet any identified need for Gypsy and Travellers over the full plan period up to 2031.

- Where funding for related infrastructure is to be sought through planning obligations, the Deposit Plan should specify the Council's priorities to inform the provision of infrastructure/mitigation and avoid a scheme being unviable.
- The Deposit Plan should evidence any proposed allocations and demonstrate that any loss of Best Most Versatile land is minimised, in accordance with PPW paragraph 4.10.1.
- The LDP should develop policies to guide all forms of renewable and low carbon energy development.
- The preparation and timing of Supplementary Planning Guidance particularly of those significant elements should be provided at the deposit plan stage.
- The Replacement Deposit LDP should contain robust and sustainable strategic policies to ensure that the strategy delivers good quality sustainable development and an environment that respects opportunities for green infrastructure and biodiversity.

ANNEX 1: REPRESENTATIONS ON THE PREFERRED STRATEGY

2282.P1 WELSH GOVERNMENT

Representation

There are multiple references to 'up to 2031' and 'roll forward' throughout the LDP and supporting documents which add confusion. The LDP needs to be clear that it is indeed a replacement plan.

Council Analysis

The 2013 Annual Monitoring Report identified the need to review Caerphilly County Borough Local Development Plan up to 2021. For the purposes of clarity, the emerging LDP will be referred to only as the Replacement Caerphilly County Borough Local Development Plan up to 2031. All references to 'roll forward' will be removed from the Plan and any supporting documents.

Recommendation

No amendment be made in respect of this representation

2282.P2 WELSH GOVERNMENT

Representation

The LPA has set out detailed reasons why it would not be appropriate for the LPA to undertake a joint LDP with neighbouring authorities at this time. The authority has alluded to potential cross boundary issues such as commuting patterns, housing, employment, infrastructure provision and gypsy and travellers. It is important that the authority provides evidence of collaborative working on key issues (where appropriate) to ensure a robust evidence base.

Council Analysis

The Council notes this representation. The Council is fully aware of the collaborative agenda and has been working closely with neighbouring authorities on significant cross boundary issues. Evidence of cross boundary working will be provided as part of the evidence base and supporting documentation to the Deposit Replacement LDP in line with Regulation 17.

Recommendation

No amendment be made in respect of this representation

2282.P3 WELSH GOVERNMENT

Representation

The vision is generic with no mention of key places or areas of change; in essence it is not clear how the strategy is reflected in spatial terms. There are 41 key aims and objectives many of which appear to be unnecessary duplicated. The LPA should consider refining them, grouping into key themes, linked to the key issues the plan is seeking to address.

Council Analysis

The LDP vision was developed in conjunction with partners and authority members and provides the overall view of the future direction of the local authority prior to developing the LDP objectives. It has been refined since the Draft Preferred Strategy was prepared to make reference to the planned areas of growth.

The vision accords with and fulfils guidance set out in Paragraph 5.5 of the Local Development Plan Manual in so far as the vision is “well rounded so that there should be a balance between economic, social and environmental objectives.”

The Council note that there are a large number of key aims and objectives. Many of the objectives are cross cutting and fulfil a number of aims, where appropriate they have been refined to remove any duplication, however it is not considered appropriate to group them under topic areas.

Recommendation

The comments are noted, and minor modifications have been made to both the vision and the key aims and objectives.

2282.P4 WELSH GOVERNMENT

Representation

Welsh Government note that the LPA has tested 5 spatial options.

The 'Sustainable Urban Growth Network Strategy' primarily seeks to target development in line with the role and function of places. The Preferred Strategy identifies the ten component parts of the strategy. In essence the Council is proposing to reduce the scale of new housing allocations in the HOVRA to more closely align with market activities and demand, targeting the majority of new development and expansion opportunities within the SCC and MVC. The Welsh Government supports the ethos of the strategy, which is broadly in line with the principles of sustainable development as set out within national policy.

Council Analysis

The Council welcomes and notes the representation of support for the Sustainable Urban Growth Network Strategy.

Recommendation

The comments be noted.

2282.P5 WELSH GOVERNMENT

Representation

WG note that the role and function of settlements has been a significant consideration in the identification of sites for new development and note that this has been examined in some detail within Doc BR1: Functional Analysis. However it is unclear how the analysis of settlements, namely the need to consider viable greenfield release in the SCC to deliver a five year land supply and affordable housing, has been translated into the type, scale and location of growth

Council Analysis

The role and function of settlements has been integral to the consideration of and identification of sites for new development. The functional analysis identifies that there are very few settlements within the county borough that are capable of being self sufficient in terms of comprising an adequate range and mix of land uses. As a consequence most settlements enjoy a close relationship with a network of other villages and towns in order to provide the range of services that are needed to sustain them.

The Sustainable Urban Network Growth Strategy identifies three broad strategy areas, the Heads of the Valleys Regeneration Area (HOVRA), the Mid Valleys Corridor (MVC) and the Southern Connections Corridor (SCC). Within each strategy area there is an existing network of urban and rural settlements that are centred on a Principal Town or conurbation, which acts as the hub for enterprise and activity. A number of Local Centres and a network primarily of residential urban areas support each of the Principal Towns.

The Principle Towns include Bargoed, Ystrad Mynach, Blackwood, Caerphilly & Risca. These Principal Towns are all strategically important as they are capable of supporting countywide services and facilities that are required to meet the wide and diverse social, economic and community needs of the resident and working population of the town, the surrounding Local Centres and residential areas. The emphasis on Principal Towns will be on developing them as a focus for economic activity whilst ensuring that their vitality and viability is strengthened. The strategy will achieve this through the identification of land for a diverse variety of services, facilities and uses that complement the unique selling point of each of the Principal Towns.

Principal Towns are supported by important Local Centres within the County Borough namely, Rhymney, Nelson, Newbridge and Bedwas, which are generally smaller and not as strategically significant but nevertheless perform a wider role than serving local needs. They have a valuable role, providing a range of local services and facilities that meet the day-to-day needs of residents. The emphasis in these areas will be sustaining and diversifying the existing facilities to reinforce their importance as a Local Centre. The Strategy will serve to improve the connectivity of these Local Centres with Principal Towns and to a wider population with a view to sustaining and enhancing their role into the future.

All other towns and villages within settlement limits are referred to as primarily residential areas, although it is important to note that these areas will also contain complementary local facilities such as schools and local shops and often local employment. The emphasis within residential areas will be on small-scale expansion, retaining their distinct identity, providing a choice of housing types, increasing connectivity to Principal Towns and Local Centres and maintaining an attractive community where people will want to live.

The scale of proposals targeted to each of the strategy areas is based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for the necessary social or physical infrastructure.

In essence, the strategy is proposing to reduce the scale of new housing allocations in the HOVRA to more closely align with market activities and demand, targeting the majority of new development and expansion opportunities to within the SCC and MVC. Specifically, the SCC experiences significant development pressure due to its proximity to Cardiff, Newport and the M4 Corridor. There are a very limited number of brownfield sites left within the SCC, and with the emphasis placed on deliverability, this necessitates the need to release viable greenfield land within this strategy area. The release of greenfield land in this strategy area has been carefully considered and those sites that can be supported by sustainable modes of transport have been prioritised over sites that would be largely reliant on the car. Further the potential attractiveness of the site has been considered and the viability and deliverability of sites has been an important consideration in determining which

sites to allocate in the plan. These factors in turn, contribute to delivering a 5 year housing land supply. The Deposit Replacement LDP will allocate appropriate land for development of an appropriate scale and type in order to allow for the planned growth across the whole county borough and target significant growth to the areas of planned expansion, specifically Maesycwmmmer in the Mid Valleys Corridor and South East Caerphilly in the SCC.

Recommendation

The comments be noted.

2282.P6 WELSH GOVERNMENT

Representation

WG have key concerns regarding the soundness of the overall strategy as follows:

- Lack of clarity on the spatial distribution by strategy area both in numerical terms, and components of supply (i.e. broad numerical ranges / land bank / allocations).
- Lack of clarity on how the strategy has changed compared to the previous LDP in respect of the scale and location of greenfield and brownfield sites within each strategy area.
- Lack of clarity as to what sites have been rolled over from the current LDP (What is the rationale for this and are they viable / deliverable in the plan period? i.e Bedwas Colliery).
- Lack of clarity as to how national policy in respect of flood risk has influenced the scale and location of growth.
- How have the conclusions of the LHMA and viability work influenced the scale and location of growth and the delivery of affordable housing?
- Lack of clarity as to why 'environmental capacity' has formed a justification for restricting growth in the SCC. New allocations in the SCC appear to be predominantly brownfield . There appear to be more dwellings / allocations in the MVC. How does this approach align with the AMR / Review Report?
- New strategic sites appear to be predominantly brownfield in nature and require significant transport infrastructure to enable them to come forward. Are the strategic sites deliverable? How will they contribute to the delivery of a 5 year land supply and affordable housing?

The WG considers that the above are key issues that need to be addressed in the Deposit Plan. It is essential that the selection of a preferred spatial option is clearly and firmly founded on robust evidence. How the chosen spatial strategy will specifically deliver the key objectives of the plan is fundamental.

All aspects of sustainable development should be taken into account when determining the scale and location of development.

Council Analysis

The Council note the above comments. The Pre-Deposit Proposals Documents have been prepared in accordance with the National Policy and Guidance and have taken into account advice contained in the Local Development Plan Manual. As such the Preferred Strategy Proposals documents contain:

- Regional and local context – policy issues, geography etc
- Vision and LDP objectives
- Direct linkages to statutory documents, such as the Wales Spatial Plan, the Regional Transport Plan, and Community Strategy and integration with other strategies as applicable
- Summary of proposed strategy, including strategic sites necessary for its implementation, proposed areas of protection or change
- Broad locations for non strategic sites and criteria for their inclusion
- Other relevant policy which would implement the preferred strategy e.g. employment and economic strategy; community and local service needs; open space and leisure strategy; energy, waste management and minerals supply options, housing density / car parking.
- Key diagram showing preferred spatial strategy, with consideration of significant external links to neighbouring authorities
- Site register of non strategic sites identifying those considered to accord with the preferred strategy and those which do not
- Proposal for the structure and scope of the deposit LDP, and any concurrent SPG

The issues that WG address are not a requirement at Pre-Deposit stage and will be addressed fully and in compliance with The Town and Country Planning (Local Development Plan)(Wales) Regulations 2005 as amended by the Regulations 2015, and the Local Development Plan Manual at the Deposit Stage.

Recommendation

The comments be noted.

2282.P7 WELSH GOVERNMENT

Representation

Growth Options

Planning Policy Wales (PPW) paragraph 9.2.2 states the latest WG household projections should form the starting point for assessing housing requirements. In this case, WG 2011 based household projections are the latest projections. It is for the LPA to evidence and justify the level of housing provision set out in their plan, having regard to PPW (paragraphs 9.2.1 & 9.2.2). The level of provision should be linked to the key issues the plan is seeking to address, and not just become a mathematical calculation.

The WG's 2011 population and household projections were published in July 2013 and February 2014 respectively. The latest projections are trend based and are characterised by periods of economic decline, difficulty in accessing finance, lower house building rates and an increase in people remaining within their homes. The Minister for Housing and Regeneration (now the Minister for Natural Resources) in his letter to local authorities dated April 2014 provides a clear message that it is not appropriate for authorities to plan for and replicate such a period of poor economic performance.

On balance, the WG supports the technical work undertaken by the Council in embracing a positive approach to national policy. Indeed, the technical work utilises the more positive SE Wales 10-year migration trend and a lower household size at the end of the plan period. However, it is considered that the inter-relationship between housing and employment in the Borough and neighbouring plan areas would benefit from further clarification.

Council Analysis

The Council welcomes Welsh Government's support for the technical work utilised in the population and household forecasting methodology, and the recognition that a positive approach has been taken to national policy.

WG are seeking further clarification in respect of the inter-relationship between housing and employment in the Borough and neighbouring plan areas. The Deposit Replacement LDP will be supplemented by a series of background papers, the Employment Background Paper will evidence in detail issues pertaining to employment. However to provide an overview, Caerphilly County Borough has the second highest out-commuting rate in the region, after the Vale of Glamorgan, with 46% of working residents doing so outside the county borough, with over half of all out-commuting to Cardiff and Newport. Despite this, Caerphilly is also a destination for commuters from elsewhere, particularly Cardiff, Rhondda Cynon Taff, and Blaenau Gwent. 15,700 workers travel from outside the County Borough to work, suggesting that Caerphilly's economic links with its immediate neighbours in the region are particularly strong.

A functional analysis of the County Borough identifies that there are very few settlements within the county borough that are capable of being self sufficient in terms of comprising an adequate range and mix of land uses. As a consequence most settlements enjoy a close relationship with a network of other villages and towns in order to provide the range of services that are needed to sustain them. In this regard, the Preferred Strategy is seeking to both improve connectivity with Principal Town Centres, as centres of economic activity, whilst similarly ensuring that key settlements have sufficient employment opportunities for residents. Opportunities for economic / commercial

development will be identified within Principal Towns in order to exploit town centres as hubs of enterprise and in turn increase footfall within town centres. Similarly, employment sites will be allocated and protected for employment use throughout the county borough. Sufficient employment land will be allocated / protected to allow for choice and flexibility and will be targeted at and within close proximity to Principal Towns and Local Centres throughout the borough.

Recommendation

The comments be noted.

2282.P8 WELSH GOVERNMENT

Representation

Housing Provision – Flexibility

Policy SP21 proposes a housing provision of 13,640 new dwellings to deliver 12,400. We support the inclusion of a flexibility allowance within the plan. It will be for the LPA to evidence that a 9% flexibility allowance is a sufficient buffer to demonstrate that the plan can respond to economic challenges and unforeseen circumstances associated with delivery.

Council Analysis

In making provision for housing land it is good practice to allocate more land than the housing land requirement to allow for choice and flexibility. The amount of over provision is not prescribed in national planning guidance, but it is best practice for local authorities to assume approximately 10% over-allocation. This approach has been followed by most South East Wales local authorities in the preparation of their development plans. The preferred strategy identified as 10% flexibility allowance with a housing provision of 13,640 new dwellings to deliver a housing requirement of 12,400 units, not 9%, as identified by Welsh Government. It is anticipated that the Deposit Replacement LDP will include a similar flexibility allowance. The sites allocated for housing are those that are considered deliverable within the lifetime of the plan, having regard for constraints and viability. The sites currently allocated in the adopted LDP have been re-assessed and only those sites that are still genuinely available and realistically likely to be developed within the plan period will be carried forward into the Deposit Replacement LDP. It is therefore considered that 10% is an appropriate flexibility allowance.

Recommendation

The support be noted.

2282.P9 WELSH GOVERNMENT

Representation

Vacancy Rate / Empty Homes

Doc BR3a Population and Housing Growth Options Background Paper (Page 78) sets out the Council's position in terms of empty homes which equate to 486 units over the plan period. Homes brought back into beneficial use through an empty homes strategy, should not provide a net gain in housing supply as the stock is already in existence. To be clear these units should be removed from housing land supply calculation (Table 7.9).

Council Analysis

In the adopted LDP, the housing land supply calculation included a small assumption for the number of long term empty dwellings that have been brought back into beneficial use for residential purposes. These units were primarily delivered through Local Authority intervention through the provision of grants or loans, providing advice, referral to partner Registered Social Landlords, enforcement action or enquiries to establish ownership with follow up actions.

The Council has been successful in reducing the number of long term empty dwellings over the plan period with a average of 24 units per annum being returned to beneficial use over the 10 year period up to 2012/13 and it is reasonable to assume that this trend will continue, due to the emphasis placed on this policy initiative by the Welsh Government. However, it is recognised that this will not increase the overall level of stock and as a result the housing land supply calculation has been amended and therefore an assumption for empty home conversions is no longer factored into the figures.

Recommendation

An assumption for empty home conversions is no longer factored into the figures.

2282.P10 WELSH GOVERNMENT

Representation

Employment – Scale & Distribution

Doc BR4, page 17 identifies a total of five employment allocations resulting in a total provision of 55 Ha of employment land. The WG has concerns on the limited number of sites that make up the employment provision, in particular the reliance on Oakdale Business Park, which accounts for approximately 72% of all employment land supply in the County Borough.

Strategy Area	Number of Sites	Size (ha)	Percentage Split
HoV	1	5.16	9%
MVC	2	44.16	81%
SCC	2	5.52	10%

TAN 23 (para 4.5.1) states that employment land targets should aim to ensure that planning meets the demand for land, so that economic growth is not constrained by lack of land. The Council's evidence highlights the reasons as to why the SCC is considered an area of high market demand with low vacancy rates on employment sites (BR4, page 15). It is unclear as to why only 5.5 ha of brownfield land has been allocated in the SCC. Indeed, the level of employment in the SCC only marginally exceeds the proposed levels in the HoV, where deprivation and out-migration result in a significantly reduced demand for employment land. The authority should explain how past take-up rates have influenced the scale and distribution of employment allocations and explain how the proposed employment allocations align with areas of demand.

Paragraph 2.1.1 of TAN 23 acknowledges that economic objectives are not necessarily in conflict with social and environmental objectives and as such, the authority is advised to consider the questions posed in Chapter 2 of TAN 23 to help clarify and balance any economic, social and environmental issues in the SCC.

Council Analysis

The Council note the requirements of TAN 23, Economic Development. In particular that LPAs should 'recognise market signals and have regard to the need to guide economic development to the most appropriate locations rather than discourage such development'. The Deposit Replacement LDP will allocate additional land within the SCC.

In considering the scale and distribution of employment sites, it is also necessary to set the Caerphilly land supply within the context of the Cardiff Capital Region as a whole. In this context the Cardiff Capital Region is taken to be the ten local planning authorities in SE Wales. Within this area provision is made in adopted and emerging LDPs for approximately 1,180 ha of additional land for employment use. This compares to an estimated requirement for approximately 950 ha and represents a regional over-allocation of 23.5%. Almost all authorities have allowed for a degree of supply that exceeds their requirement, in compliance with established practice. It is important to note that in addition to this new land, SE Wales also has a significant amount of existing employment sites that accommodates the existing industrial and office stock of the area. This is difficult to quantify however as there is no common approach within the region to its allocation, continued protection or diversification to other uses. WG contend that there is an over-reliance on Oakdale Business Park within the MVC, whilst Oakdale Business Park is a substantial allocation, additional

sites will be allocated within the Deposit Replacement Plan across the county borough at strategic locations for example Ty Du in Nelson, Caerphilly Business Park, Ness Tar Plant Caerphilly and Rudry Road Caerphilly, as part of the planned expansion of South East Caerphilly.

Notwithstanding this, Oakdale Business Park remains an important site within the county borough with the potential to accommodate a significant number of jobs. Its location, coupled with its size, makes it an attractive option for new firms looking to relocate from outside the County Borough and, indeed, for workers commuting into the area from adjacent authority areas. It is however recognised that in terms of the region, this site is at a disadvantage to other comparable sites due to the lack of a railway station in close proximity. However this position will be improved with the introduction of a new rail halt at Crumlin, which will make the site more accessible within the Cardiff Capital Region.

Recommendation

The comments be noted.

2282.P11 WELSH GOVERNMENT

Representation

Delivery of Employment Allocations

Doc BR4 (paras 4.2 and 6.5) acknowledge that Oakdale Business Park in the MVC is cited as 'problematic' by the market given its lack of broadband availability and poor accessibility to a railway station. The Council need to demonstrate delivery of key employment allocations within the plan period. In addition the updated assessment of employment land by BE Group should be utilised by the Council to update Appendix 3 of the draft Preferred Strategy.

Council Analysis

Oakdale Business Park is one of the largest development plateaus available in the South Wales Valleys. The plateau is served by a purpose built road, the Sirhowy Enterprise Way and is in close proximity to the Principal Town of Blackwood. Whilst the plateau does not have immediate accessibility to a railway station, the site is serviced by public transport with an extension to the bus network. The Council are aware of the need to demonstrate that allocated sites are deliverable. The Deposit Replacement LDP and its appendices will address this issue.

Recommendation

The comments be noted.

2282.P12 WELSH GOVERNMENT

Representation

Employment Provision

In accordance with paragraph 4.5.2 of TAN 23, the WG is supportive of a land provision target that is higher than anticipated demand. However, the WG requires clarification as to how the employment land requirement has been calculated. The Council should explain how past take-up rates averaging 1.67 ha per annum, total 29 ha and not 33.4ha over a 20-year plan period.

Council Analysis

The Council welcomes Welsh Government's support for setting an employment land provision target higher than anticipated demand to allow for choice and flexibility. The past take-up rate is based upon monitoring the take-of employment land over a 12 year period 2000-2005 and 2007-2013 (one of these years was non-inclusive). During this period 20.02 Hectares was developed for employment use, equating to 1.67 hectares per annum. Projecting this forward over a 17 year period, (2015 until 2031), results in a requirement of 28.39 hectares of employment land.

Recommendation

The support be noted

2282.P13 WELSH GOVERNMENT

Representation

Waste

TAN 21 (paragraph 3.21) states that LDPs should indicate where suitable and appropriate sites exist for the provision of all types of waste management facilities in order to provide some certainty for waste operators interested in fulfilling demand in an area. The employment sites listed in Appendix 3 should indicate those sites considered suitable for waste management facilities.

Council Analysis

The Council note the requirements of TAN 21, the Deposit Replacement LDP will address this issue making provision for waste management facilities on suitable employment sites. This matter is not required to be addressed at Pre-Deposit stage and will be addressed fully and in compliance with The Town and Country Planning (Local Development Plan)(Wales) Regulations 2005 as amended by the Regulations 2015, and the Local Development Plan Manual at Deposit Stage.

Recommendation

The comments be noted.

2282.P14 WELSH GOVERNMENT

Representation

Affordable Housing – Local Housing Market Assessment

It is essential that the LPA demonstrates that it has maximised affordable housing provision given that it is a key reason for plan revision. The Council refer to a LHMA which indicates a need for 526 affordable homes to be built per annum, however it is disappointing that no LHMA has been submitted with the evidence base. It is therefore unclear as to how the LHMA has influenced the scale and distribution of growth. This is critical given that affordable housing delivery is a key reason for reviewing the plan.

Policy SP22 refers to an affordable housing target of 1,200 dwellings. There is no information or supporting evidence to show how this figure has been arrived at, or indeed how it relates to the proposed overall housing delivery target of 12,400 dwellings.

The Deposit Plan should;

- explain how LHMA has informed the spatial strategy in order to maximise the delivery of affordable housing;
 - include an indication of the overall level of need for affordable housing (based on an up to date LHMA) including any backlog;
 - include a target for the provision of affordable housing that will be delivered through the planning system. The authority should maximise delivery supported by robust viability evidence.
-

Council Analysis

The Council produced a Local Housing Market Assessment (LHMA) in April 2015, providing an indication of the level of housing need in the County Borough. This document is publicly available on the Council's website and forms part of the evidence base informing the Deposit Replacement LDP.

In addition to the LHMA, the Council have undertaken an Affordable Housing Viability Assessment (AHVA) to inform the Deposit Replacement LDP. The AHVA in conjunction with the LHMA provides the evidence base to inform the target for the delivery of affordable housing through the planning system.

In light of the findings of the AHVA, taken in conjunction with the LHMA, the affordable housing target in Policy SP22 has increased to 1,930 affordable dwelling, which reflects the number of units that it is expected can be delivered having regard for the sites that are proposed in the Deposit Replacement LDP.

Recommendation

The comments be noted.

2282.P15 WELSH GOVERNMENT

Representation

Affordable Housing – Financial Viability Assessment

No broad level affordable housing viability assessment has been submitted with the evidence base. It is therefore unclear as to how affordable housing viability has informed the spatial distribution of housing, in particular the type (i.e. greenfield/brownfield) and scale of allocations in the SCC.

The Deposit Plan should;

- explain how the affordable housing viability work has influenced the scale and location of growth;
- be supported by robust viability evidence that takes into account all associated known build costs (e.g. building regulations), including the impact of affordable housing contributions. Whilst challenging, targets need to be grounded in evidence and applicable to the majority of applications, whilst allowing site specific negotiations to occur, if/where necessary (on a limited number of sites);

- indicate how the target will be achieved using identified policy approaches; which may include site thresholds, site specific targets, rural exception sites. The authority should demonstrate that it has maximised delivery, supported by robust viability evidence.
-

Council Analysis

The Council have prepared an Affordable Housing Viability Assessment (AHVA) to inform the Deposit Replacement LDP. The AHVA in conjunction with the LHMA provides the evidence base to inform the target for the delivery of affordable housing through the planning system.

The AHVA is provided as a background document to the Deposit Replacement LDP, demonstrating the robust viability evidence on which policies are based. The Deposit Replacement LDP will address all issues raised.

Recommendation

No amendment be made to the Preferred Strategy in respect of this representation

2282.P16 WELSH GOVERNMENT

Representation

Gypsy and Traveller provisions of the Housing (Wales) Act 2014, except sections 103 and 104, came into effect on 25 February 2015, along with updated supporting guidance on how to undertake a GTAA. The legislation places a duty on local authorities to undertake Gypsy and Traveller Accommodation Assessments (GTAAs) by March 2016. We note a GTAA has not been submitted as part of the evidence base. Paragraph 8.22 of the Preferred Strategy indicates that further work needs to be undertaken with neighbouring authorities in this respect.

National policy contained in Welsh Government Circular 30/2007 'Planning for Gypsies & Travellers' (paragraph 17) states that "where there is an assessment of unmet need for Gypsy and Traveller accommodation in the area, local planning authorities should allocate sufficient sites in LDPs to ensure that the identified pitch requirements for residential and transit use can be met." This is particularly pertinent in light of the duties (Section 103) within the Housing (Wales) Act 2014.

The Deposit LDP should make provision to meet any identified need over the full plan period to 2031. In addition, the Deposit plan should also include criteria based policies as advocated within national policy.

Council Analysis

Part 3 of the Housing (Wales) Act 2014 requires local authorities in Wales to undertake a Gypsy and Traveller accommodation assessment (GTAA) and, where an unmet need is identified, make provision for residential site pitches.

The Council are carrying out a GTAA in accordance with statutory guidance issued by Welsh Government. As part of the assessment process the council will attempt to speak with as many members of the Gypsy Traveller community living in the county borough as possible. The completed GTAA will be submitted by the council to Welsh Government for approval in advance of 23rd February 2016 and will be used to inform policy in the Deposit Replacement LDP.

Notwithstanding the GTAA, the council is required by Welsh Government to undertake a separate assessment for Gypsies and Travellers due to the very low number living in the borough. This has been undertaken as part of the Local Housing Market Assessment (LHMA) April 2015. A completed assessment of housing needs, of the settled community is contained within the LHMA.

The Council note the requirements of the Deposit Replacement LDP as they relate to Gypsy and Traveller provision.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P17 WELSH GOVERNMENT

Representation

Delivery & Phasing

The authority need to demonstrate that all allocations and commitments are financially viable and deliverable within the plan period. Demonstrating that key infrastructure can be delivered will be fundamental to the strategy. Key timings, phasing, funding mechanisms will be essential to ensure that infrastructure can be delivered in the plan period. The LDP proposes significant infrastructure proposals i.e. two new bypasses, the reopening of disused railway lines and two new rail stations. How and when will key infrastructure be funded and delivered?

Council Analysis

The Council are aware that all allocations should be deliverable and financially viable. The Deposit Replacement LDP will include information on the deliverability of allocations including key timings, phasing and funding requirements needed to achieve both development and infrastructure.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P18 WELSH GOVERNMENT

Representation

Viability Evidence (Delivery, Phasing & Infrastructure)

A simple housing trajectory would assist all parties to understand and consider the ability of the sites contained in the plan to be delivered, supported by viability evidence. This work should be supported by an analysis and understanding of lead in times for large and strategic sites, the inter-relationship between such sites, potential constraints and costs, infrastructure requirements, funding streams and robust assumptions for small and windfall sites. The authority will need to demonstrate a five-year housing land supply from the adoption of the plan.

Council Analysis

The Deposit Replacement LDP will contain sufficient land allocated for housing to allow for choice and flexibility. The Deposit Replacement LDP will include a housing trajectory indicating when sites will be delivered during the plan period in order to ensure a 5 year land supply. Sites requiring significant infrastructure to be realised, will be detailed in the Deposit Replacement LDP.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P19 WELSH GOVERNMENT

Representation

Community Infrastructure Levy / Planning Obligations

Where funding for related infrastructure is to be sought through planning obligations, the Deposit Plan should specify the Council's priorities to inform the provision of infrastructure/mitigation and avoid a scheme being unviable.

The authority has indicated that it will be seek to reduce the affordable housing percentage due to viability issues. The authority should clarify if the viability work has considered any consequential impacts in respect of affordable housing delivery and CIL.

Council Analysis

The Council have prepared an Affordable Housing Viability Assessment (AHVA) to inform the Deposit Replacement LDP. The AHVA in conjunction with the LHMA provides the evidence base to inform the target for the delivery of affordable housing through the planning system. The viability considers affordable housing, viability issues and the consequential impact on CIL. Where funding is to be sought for related infrastructure via planning obligations, this will be specified.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P20 WELSH GOVERNMENT

Representation

Transport Infrastructure

The Transport & Accessibility Paper (BR7) highlights the key issues and transport infrastructure that could be identified in the Deposit Plan. The achievement of many of the LDP's key objectives will be dependent upon development being integrated with the provision of key transport infrastructure. The document alludes to 'aspirational' infrastructure such as the re-opening of railway lines and new stations.

The authority should provide greater explanation within the deposit plan noting the key infrastructure that is required to meet the strategy, including the various funding mechanisms & CIL/S106 planning obligations that would be required to deliver these key projects.

Council Analysis

The Council are aware that all allocations should be deliverable and financially viable. The Deposit Replacement LDP will include information on the deliverability of allocations including key timings, phasing and funding requirements needed to achieve both development and infrastructure.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P21 WELSH GOVERNMENT

Representation

Flooding

Appendix 2 of the Preferred Strategy contains a list of candidate sites, indicating which sites 'meet the Preferred Strategy'. It is unclear how flood risk has been considered when shortlisting these sites. We note that the SA and Functional Analysis alludes to issues of flood risk around Risca/Pontymister and indicates that Flood Alleviation Works in Lower Islwyn may be required to 'unlock key potential development sites'. We note that 200 residential units are identified on the SCC Key Diagram (Page 49).

The authority should provide clear evidence of how flooding policy has been considered in the development of the preferred strategy and site selection process. TAN15 clearly states that highly vulnerable development (which includes residential) and emergency services should not be allocated within zone C2. This is regardless of a FCA. The deposit plan should ensure this is indeed the case.

Council Analysis

The Council notes the requirements of TAN 15 Development and Flood Risk. The Council will use a precautionary approach to the release of sites and as such will not allocate any vulnerable development within a Zone C2 flood risk area.

Recommendation

The comments be noted

2282.P22 WELSH GOVERNMENT

Representation

Agricultural Land

We highlight that three candidate sites (STJ004, STJ005, and STJ009) indicate the possibility of BMV agricultural land being present within the site boundary. The Deposit Plan should evidence any

proposed allocations and demonstrate that any loss of BMV land is minimised, in accordance with PPW paragraph 4.10.1.

Council Analysis

The Council acknowledge the presence of BMV land within the above candidate sites. It should be noted that not all the candidate sites mentioned conform with the Preferred Strategy and if the Council were mindful to allocate any of these sites in the deposit plan, due regard would be given to Paragraph 4.10 of Planning Policy Wales, Edition 7.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P23 WELSH GOVERNMENT

Representation

Minerals

Clear evidence should be provided on how mineral supply and safeguarding has affected the development of the preferred strategy and proposals. We note that the authority has included Strategic Policy 14 on minerals safeguarding. The strategic policy needs to be sufficiently clear to articulate the authority's strategy for minerals, supported by robust evidence.

The deposit plan should;

- safeguard mineral resources in line with national policy and maintain consistency across boundaries with neighbouring LPAs;
- safeguard existing and potential new railheads in order to provide a full range of sustainable transport options;
- adequately provide for the contribution to aggregates production over the plan period as identified in the RTS 1st Review;
- be as clear as possible as to areas where coal should not be worked in order to provide certainty to communities;
- include buffer zones around permitted and proposed mineral workings;
- set a clear strategy for dormant mineral sites and provide clarification on serving prohibition orders;
- encourage prudent use of natural resources and promote the use of recycled, secondary aggregates or waste materials to reduce primary resources extracted;

- develop a suitable policy framework to ensure the environmental, amenity and health impacts of future applications are appropriately assessed.
-

Council Analysis

The Council note this representation however the issues that WG address are not a requirement at Pre-Deposit stage and will be addressed fully and in compliance with The Town and Country Planning (Local Development Plan)(Wales) Regulations 2005 as amended by the Regulations 2015, and the Local Development Plan Manual at Deposit Stage.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P24 WELSH GOVERNMENT

Representation

Renewable & Low Carbon Energy

We note that the Preferred Strategy only contains a policy relating to wind energy schemes, however, PPW states that local planning authorities should plan positively for all forms of renewable energy and low carbon energy development using up to date and appropriate evidence (paragraph 12.9.1).

The deposit plan should;

Develop policies to guide all forms of renewable and low carbon energy development (PPW, paragraph 12.8.9). This should be supported by undertaking an assessment of the potential of all renewable energy resources and renewable and low carbon energy opportunities. The Welsh Government's Practice Guidance: Planning for Renewable and Low Carbon Energy Toolkit for Planners provides advice on how to prepare a robust evidence base and will be updated in the Spring to assist LPAs to undertake an assessment of the potential for solar energy generation in their area. It is noted that a landscape sensitivity analysis has been undertaken by the authority which could form part of the evidence base.

Strategic Policy SP13 – Renewable Energy: Local Areas of Search sets out that areas have been identified for the provision of renewable energy wind schemes, within which, there is a general presumption in favour of development. The allocation of such areas must be informed by a robust evidence base. Sub-local authority scale renewable energy projects (between 50KW and 5MW) are

applicable in all parts of Wales. The LDP should encourage such development and clearly set out the local criteria against which such proposals will be evaluated.

In addition, PPW (4.12.5 and 12.9.8) states that local authority should assess strategic sites to identify opportunities for higher building standards (including zero carbon). Local authorities should also seek to maximise the opportunities for district heating and generation schemes. The authority should demonstrate that these issues have been considered for strategic sites.

Council Analysis

The Council has prepared an up to date Renewable Energy Baseline Assessment, which provides robust evidence base on which to prepare appropriate local policies. The Council will re-draft Strategy Policy SP13 to ensure that the issue of renewable energy and low carbon energy development is adequately addressed in the Deposit Replacement LDP. These policies will be supplemented by supplementary planning guidance.

The Council will also ensure that strategic sites make an appropriate contribution towards providing increased levels of energy generation as appropriate.

Recommendation

The comments be noted.

2282.P25 WELSH GOVERNMENT

Representation

Natural Heritage

There is no background/topic paper on natural heritage. It is therefore unclear as to how issues of natural heritage have informed the spatial strategy. As previously stated it is unclear how 'environmental capacity' has influenced the scale and distribution of growth in the SCC.

The Council need to explain as to what 'weight' has been given to environmental designations and how the presence (or otherwise) of these designations has informed the strategy and key allocations in the plan. In particular, what is the relationship to the requirement to consider releasing viable greenfield sites in the SCC to deliver on the key issues the plan is seeking to address? It is fundamental that the Deposit Plan addresses these issues, in line with PPW (Chapter 5) supported by the SA.

Council Analysis

Natural Heritage has been a key consideration in the development of the Preferred Strategy. Whilst it is acknowledged that a number of greenfield sites will be released as part of the Preferred Strategy, careful consideration has been given to the natural heritage in releasing these areas of land for development. The Council have considered internationally important sites, including Special Areas of Conservation (SACs), nationally important sites including Sites of Special Scientific Interest (SSSIs) including the key management and policy issues affecting these designations, ensuring that allocations within the Deposit Replacement LDP would have no adverse impact. Similarly and in conjunction with this, the Council has considered all local designations including Special Landscape Areas (SLAs), Visually Important Local Landscapes, Green Wedges and Sites of Importance for Nature Conservation (SINCs) to ensure that allocations would have no adverse impact on these designations and where they do, that the consequences of development can be acceptably mitigated against. All candidate sites have been subject to a rigorous assessment to determine their acceptability or otherwise in terms of their impact on landscape and ecology.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2282.P26 WELSH GOVERNMENT

Representation

Supplementary Planning Guidance

The preparation and timing of SPG, particularly of those significant elements should be provided at the deposit plan stage, and linked to monitoring framework where applicable.

SPG adopted under the current adopted plan should be reviewed or updated to ensure that it is in line with the LDP.

Council Analysis

The Council note Welsh Government's comments in respect of supplementary planning guidance.

Recommendation

The comments be noted

2282.P27 WELSH GOVERNMENT

Representation

Monitoring

It is vital that the monitoring framework includes key triggers and action points so that appropriate action can be in place in advance to avoid a situation of non delivery. When the Deposit Plan is produced, a significant number of LDPs will have either gone through examination or been adopted. This provides useful good practice examples, which the authority could benefit from, building on the experiences and effectiveness of the current adopted framework.

Council Analysis

The Council note Welsh Government's comments in respect of monitoring and agree that it is vital to have a robust monitoring framework that includes key triggers and action points in order to determine the plan's effectiveness in terms of delivery and implementation. The Council has invested significant time and resources into its monitoring systems and these will be modified as necessary to reflect the monitoring requirements of the Replacement LDP

Recommendation

The comments be noted

1492.P1 HOME BUILDERS FEDERATION

Representation

LDP Vision (Question 1)

The representor considers that describing the Council as being at the 'heart' of the city region would tend to suggest it is the lead Authority for Cardiff Capital Region which is confusing.

The representor supports the reference to the need to provide a wide range of sites that will allow homes to be developed. Although we will in later answers, question whether or not the proposed policies and changes to the plan will achieved this.

Council Analysis

The Strategy does not infer that it is the lead authority within the Cardiff Capital Region, at ‘the heart’ is merely a locational reference as to where the county borough lies within this region.

Support for the provision of a range and choice of sites is noted and is welcomed by the Authority.

Recommendation

No amendment be made in respect of this representation

1492.P2 HOME BUILDERS FEDERATION

Representation

Aims (Question 2)

We do not consider that the having identified in the vision statement the need for homes that this then comes through clearly/strongly enough as a key Aim. We would suggest that an additional Aim should be added along the following lines:

Ensure adequate sustainable sites are available for the provision of the new homes required to support the economic prosperity and growth of the Borough.

Council Analysis

Agree. Include a new Aim as follows:

“Facilitate the development of modern, well-designed, accessible, suitable and affordable housing that meets the needs of all sections of the community through the identification of appropriate land for housing in sustainable locations.”

Recommendation

To agree to include a new aim specifically in respect of housing.

1492.P3 HOME BUILDERS FEDERATION

Representation

Objectives (Question 3)

Although we have no objection to any of the Objectives there are a large number of them and we would suggest that it may help to group them together in topic areas where possible, such as those relating to the provision of housing.

The Council should consider whether or not they should try and rank the objectives and would suggest that housing should follow sustainability at the top of the list.

Council Analysis

The Council note this representation and acknowledge that there are a large number of objectives. However, many objectives are cross cutting and fulfil a number of aims, it is therefore not appropriate to group them under topic areas. The Objectives have been refined to remove duplication.

Recommendation

That the Objectives be refined to avoid duplication.

1492.P4 HOME BUILDERS FEDERATION

Representation

Level of growth (Question 4)

It is disappointing that what is described as a 'moderate level of growth' is being taken forward as we do not feel that this supports the plans aspirations' to be the 'heart' of Cardiff Capital Region and be the 'smart alternative' for economic development. Of the many options considered this is in fact the second highest level of growth being some 3000 less than the highest with a large number of the options far lower. The HBF suggest that the chosen option should be seen (and described) as a more

positive growth strategy as this would send out a message that is more likely to support the wider aims of the plan.

However the delivery of houses required to meet this target is heavily controlled by the sites chosen by the Council and the mix of green field and brown field. Concern is raised that although the Council have moved away from the previous strategy, which has under delivered, their chosen strategy may still not enable the number of houses planned to be delivered. In particular concern is raised at the ability of the strategy to deliver houses early in the plan period, due to the reliance on two large strategic sites. In view of the current five year land supply and the history of under delivery, the Council should be looking to take full advantage of current market conditions to deliver the much needed housing now rather than later in the plan.

Council Analysis

The representor considers that the growth strategy should be described as 'positive growth strategy' as opposed to 'moderate level of growth'. The Council considers that 'moderate level of growth' is appropriate terminology and reflects the number of growth options and scenarios considered by the Council in deciding on the most appropriate level of growth for the borough. Scenario M that was chosen, was moderate in the level of growth proposed compared to other scenarios tested that had both a higher and lower levels of growth.

The Council are aware of the need to ensure that sites are deliverable and the need to ensure a 5-year housing land supply. The Deposit Replacement LDP will include a housing trajectory, detailing when housing is likely to come forward for development over the plan period.

Recommendation

No amendment be made in respect of this representation

1492.P5 HOME BUILDERS FEDERATION

Representation

Employment Land take up (Question 5)

Such an approach has its limitation as if the right land in the right location has not previously been available then any future predictions would be flawed. Economic data and future trends and predictions do exist and we question why these have not been used. Further if adequate housing has not been available, this may have acted as a barrier to economic investment.

Council Analysis

In determining the need for employment land, three alternative scenarios have been considered to inform the future need for employment land over the plan period. In addition to the preferred scenario (being the historic land take-up forecast), the Council also considered an Employment based forecast as well as a labour supply forecast, both of which are based on economic trends and predictions. The historic land take-up forecasts a greater need than both other scenarios, therefore sufficient land will be allocated to provide choice and flexibility.

Recommendation

No amendment be made to in respect of this representation

1492.P6 HOME BUILDERS FEDERATION

Representation

Strategy Areas (Question 6)

We would question if the role and functions of the settlements within the three strategy areas are distinct enough to enable the designations. In essence the strategy areas are three geographic bands distinguished more by geographic location rather than wholly by the role of the settlements therein.

Council Analysis

The strategy areas were originally based on those set out within the Wales Spatial Plan and it is considered that they still reflect the specific requirements and characteristics of each part of the County Borough and the individual settlements within them.

Recommendation

No amendment be made in respect of this representation

1492.P7 HOME BUILDERS FEDERATION

Representation

Release of greenfield land in MVC & SCC (Question 7)

We fully support the release of green field sites, particularly in the MVC & SCC. We feel this particularly aligns with the councils own statement in the objectives section of the plan where it describes the Borough being the 'smart alternative to Cardiff'. The previous strategy had an overreliance on 'brown field' sites particularly in the southern connections corridor. The failure of this strategy has been highlighted by the JHLAS five year land supply in the Borough.

This drop in five year land supply can also be viewed against the completion rates over the same period. This shows that even though completions have stayed reasonably constant the housing supply has dropped. It is suggested that this indicates that insufficient sites are available in the borough.

The HBF do however, feel that the strategy could go further and reduce the scale and number of new housing allocations in the HOVRA and MVC to more closely align with market activities and market demand in these areas. It is noted that at Appendix 3 Sustainable Urban Network Growth Strategy January 2015 a list of retained allocated sites is produced, this should include the number of units against each site.

It would also have been helpful to have shown which of the previously allocated sites have been developed and for how many units compared to their allocation as this would have given a better understanding of the success of the allocated sites. Further, a list of the sites proposed to be dropped as allocated sites should be produced giving a reason why these sites are being dropped as allocations.

At par 5.29 Sustainable Urban Network Growth Strategy January 2015 it states, 'Housing sites are identified in the Heads of the Valleys Regeneration Area but are scaled to reflect market demand'. However Appendix 3 still indicates six allocated sites delivering 873 units, including one site of 413, this equates to 58 units a year over the life of the plan (15yrs) taking no account of small sites or windfalls. This is considered to be too high and does not 'reflect market demand' as suggested.

The HBF consider that additional green belt allocations need to be considered for the SCC area as this is where the market demand is, the most sustainable settlements are and the best transport links already exist. Allocation of greenfield sites in this area would therefore be in line with the strategy of the plan.

Council Analysis

The Council welcomes the representor's support for both the strategic sites in the SCC and the MVC, and for supporting the release of greenfield land.

The Council is aware of the importance of maintaining a 5 year housing land supply. The Deposit Replacement LDP will address this issue ensuring that a range and choice of housing sites are both allocated and deliverable. The Deposit Replacement LDP will include a housing trajectory indicating when sites are likely to come forward for development over the plan period. The Council note concern raised in respect of housing numbers within the HOVRA, the Deposit Replacement LDP will

address this issue with housing allocations within the HOVRA, scaled to reflect market activity and market demand.

Recommendation

The support be noted

1492.P8 HOME BUILDERS FEDERATION

Representation

Strategic Sites (Question 8)

The Home Builders Federation have concerns regarding this approach and in particular regarding the amount of information available relating to both sites at this stage.

Maesycwmmmer - this allocation raises a number of questions:

- At what point is the new road required?
- What other infrastructure upgrades would be required?
- When are the first units likely to be delivered?
- Is it realistic to expect this site to deliver all of these units over the plan period (considering the answer to the questions above).
- Maesycwmmmer does not fall within the settlement hierarchy identified in policy SP6 and this needs to be explained.

Former Ness Tar Plant and adjoining Land - this allocation raises a number of questions:

- At what point is the new road required?
- What other infrastructure upgrades would be required?
- When are the first units likely to be delivered?
- Is it realistic to expect this site to deliver all of these units over the plan period (considering the answer to the questions above).

The answers to these questions could lead to concerns regarding the ability of these sites to achieve early delivery of houses which are much needed to ensure that a 5 year land supply can be achieved quickly and maintained through the next few years of the plan. This situation is exactly what the previous strategy did not achieve and the plan still relies heavily on brown field sites, which is part of the reason it has not delivered to date.

The alternative would be to either provide more information about the delivery of these sites before fixing a strategy, which relies on them, or alternatively, allocate additional greenfield sites in the SCC to ensure housing delivery. Given the content of paras 7.38 and 7.54 in which there is an acceptance

of a high degree of uncertainty associated with brownfield sites, there is a need to ensure that the amount of greenfield releases proposed are adequate and can be delivered early in the plan.

Council Analysis

The Council notes the HBF's concern in respect of the delivery of the strategic sites. Detailed Supplementary Planning Guidance will be produced in respect of both Strategic Sites, which will address the issues raised and which will be subject to public consultation.

Recommendation

The comments be noted

1492.P9 HOME BUILDERS FEDERATION

Representation

Although it is accepted that a lot of work has been done to support and justify the Councils current strategy, it is considered that there are some additional pieces of work that should have been carried out before fixing the strategy. This is particularly with regard to the allocation of housing sites and the proposed two new strategic sites.

At section 2.0 NATIONAL AND REGIONAL CONTEXT: DELIVERING SUSTAINABLE DEVELOPMENT. There is no reference made to PPW7 Chapter 4 Planning for Sustainability.

In particular section 4.7 Sustainable settlement strategy, at Para 4.7.4 states: Local planning authorities should assess the extent to which their development plan settlement strategies and new development are consistent with minimising the need to travel and increasing accessibility by modes other than the private car. A broad balance between housing and employment opportunities in both urban and rural areas should be promoted to minimise the need for long distance commuting.

The Council, within the consultation document, accept the pressures from Cardiff and the close links from the SCC to the M4. We therefore question whether they have given due regard to the above in deciding their strategy, particularly with regard to the housing allocations.

Council Analysis

The representor considers that further work in respect of the deliverability of the 2 strategic sites should have been undertaken in advance of determining the Preferred Strategy. The Preferred Strategy provides an important opportunity for communities and stakeholders to influence the

development strategy, which will underpin the Deposit Replacement LDP. A balance needs to be struck between the level of detail undertaken at this early stage of plan preparation given the time and resources necessary to undertake this work, and the need to lead and brook a genuine discussion with the community in terms of building a consensus on the location for that planned growth.

Further concern is expressed that given the lead in time required to deliver the strategic sites, the Council should potentially allocate additional greenfield sites within the SCC in order to deliver a 5 year land supply in the short term. The Council acknowledges this concern, however the Deposit Replacement LDP will allocate a range and choice of housing sites within the Deposit Replacement LDP to ensure a 5 year housing land supply. The Deposit Replacement LDP will contain a housing trajectory indicating when sites will be delivered over the plan period and will provide an indication of the rates of build expected on the two strategic sites.

Recommendation

The comments be noted and no amendment be made in respect of this representation

4586.P1 NATURAL RESOURCES WALES

Representation

Need for robust strategic Policies to deliver sustainable development and maximise opportunities for enhancing green infrastructure and biodiversity.

The Council has identified a need to review the Development Strategy that underpins the Adopted LDP and as such alternative strategy options have been explored. The Council in doing so has assessed these options, including the existing development strategy, to determine the most appropriate (Preferred) strategy to use. Five strategy options have been assessed which have been subject to the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA).

Option five – Targeting Growth to the Northern and Southern Connection Corridors - has been selected as the preferred option. This option ranked as the fourth most sustainable (after options 1-3) in the SEA/SA. In targeting development in two strategic areas, the SEA/SA assessed that there will be a detrimental impact in terms of the environment but this will have a positive effect socially and economically. Option 3 had the least environmental impact but it appears that there could be an impact on housing figures if large scale greenfield expansion in the south (Caerphilly Basin) is resisted as part of this option.

NRW appreciate that the main benefit of option 5 is the realistic prospect of maintaining a five-year housing supply (primarily through development in the Caerphilly Basin) which options 1-3 does not offer.

Given that the SEA/SA has identified that the Preferred Strategy will not be the most sustainable option, we consider it essential that the updated LDP has robust and sustainable Strategic Policies to ensure the strategy delivers good quality sustainable development and maximises opportunities for enhancing green infrastructure and biodiversity.

Council Analysis

The Council concur with the representor that the Deposit Replacement LDP should contain robust and sustainable strategic policies to ensure that the strategy delivers good quality sustainable development and an environment that respects opportunities for green infrastructure and biodiversity.

Recommendation

The comments be noted

4586.P2 NATURAL RESOURCES WALES

Representation

Strategy Policy 1 – Development Strategy – Development in the Heads of the Valleys Regeneration Area

SP3 includes a sub policy under G which states ‘protect the natural heritage from inappropriate forms of development’. We note SP1 and SP2 – the development strategy for the Heads of the Valleys Regeneration Area and the Mid Valleys Corridor does not have such a sub policy. We suggest that all three have a sub policy that looks to encourage the management of natural heritage by protecting and enhancing, for example, ‘protect and enhance natural heritage from inappropriate forms of development’.

Council Analysis

The Council notes the representor’s concern regarding the absence of criterion G, “protect the natural heritage from inappropriate forms of development” from Policy SP1 and SP2. This criterion was specifically added under SP3 as the Southern Connections Corridor is under tremendous pressure for development, with very few brownfield sites remaining. Whilst criterion G has not been added to policies SP1 & SP2, however sufficient regard is given to the conservation of the natural heritage by Strategy Policy SP16, which applies to the whole of the County Borough. Strategy Policy SP16 states:

“The Council will protect, conserve, enhance and manage the natural heritage of the County Borough in the consideration of all development proposals within both the rural and built environment.”

Recommendation

No amendment be made to the Preferred Strategy in respect of this representation

4586.P3 NATURAL RESOURCES WALES

Representation

Strategy Policy 2 – Development Strategy – Development in the Mid Valleys Corridor

SP3 includes a sub policy under G which states ‘protect the natural heritage from inappropriate forms of development’. We note SP1 and SP3 – the development strategy for the Heads of the Valleys Regeneration Area and the Mid Valleys Corridor does not have such a sub policy. We suggest that all three have a sub policy that looks to encourage the management of natural heritage by protecting and enhancing, for example, ‘protect and enhance natural heritage from inappropriate forms of development’.

Council Analysis

The representor’s concern regarding the absence of criterion G, “protect the natural heritage from inappropriate forms of development” from Policy SP1 and SP3 is noted. This criterion was specifically added under SP3 as the Southern Connections Corridor is under tremendous pressure for development, with very few brownfield sites remaining. Whilst criterion G has not been added to policies SP1 & SP2, sufficient regard is given to the conservation of natural heritage by Strategy Policy SP16 which applies to the whole of the County Borough. Strategy Policy SP16 states:

“The Council will protect, conserve, enhance and manage the natural heritage of the County Borough in the consideration of all development proposals within both the rural and built environment.”

Recommendation

No amendment be made in respect of this representation

4586.P4 NATURAL RESOURCES WALES

Representation

Strategy Policy 7 – Areas of Significant Change: Strategic sites to deliver planned growth

We note that the Preferred Strategy has identified two areas that can support planned growth in the two corridors (Mid Valleys and Southern Connection corridors). The boundaries of these areas have yet to be defined.

The final proposed strategic sites will need to be subject to full assessment to ensure SP7 is sound.

We note the policy references a requirement for a master planning exercise for the two sites. Further comments on master planning are set out under Sustainable Development, below.

Council Analysis

Strategic Sites will be required to be of a high quality and sustainable design and will need to be fully integrated and make a positive contribution to its host settlement. Full regard to the context of the local, natural and historic and built environment and its special features is required to be demonstrated and implemented. Both sites will be subject to a master planning exercise and detailed Supplementary Planning Guidance will be produced which will be subject to public consultation.

Recommendation

No amendment be made in respect of this representation

4586.P5 NATURAL RESOURCES WALES

Representation

Strategy Policy 9 – Place Making

We note this policy has been rolled over from the Adopted LDP. We recommend that this policy should go further to promote the natural environment and an ecosystem approach.

1. We recommend a sub policy is added that provides provision for development proposals to include the incorporation and linking of Green Infrastructure.

2. We recommend high level water quality and resources policy is included which makes reference to the Water Framework Directive and its objectives.

Council Analysis

Noted. The Deposit Replacement LDP will include a Strategy Policy specifically in respect of the Protection and Enhancement of Strategic Green Infrastructure.

Whilst full consideration is given to the Water Framework Directive and its objectives, the Council does not consider that a separate Strategy Policy is required. The Water Framework is an EU Directive and as such is European Policy, the Council in its LDP is not required to repeat European or National Policy. Due regard is given to the Water Framework Directive and it is considered in detail through the SA/ SEA of the Plan. The Deposit Replacement LDP will however include a development management policy in respect of the Protection of the Water Environment, which has been rolled forward from the adopted LDP.

Recommendation

To agree to include a new Strategy Policy in respect of Green Infrastructure within the Deposit Replacement LDP.

4586.P6 NATURAL RESOURCES WALES

Representation

Strategy Policy 13 – Renewable Energy Areas of Search

We support this strategy, which seeks to encourage renewable energy schemes. In principle a ‘general presumption in favour of development’ may be acceptable, however we believe that the qualification to this presumption (‘...provided there is no adverse impact on areas of recognised environmental, cultural or landscape importance’) requires expansion to recognise the potential for such schemes to have an unacceptable impact on other issues such as ecology and in particular, European or Nationally protected species or important and as yet unidentified habitats such as peatlands.

We note the intention to introduce local areas of search for renewable energy under this policy. We understand that no further information has been provided regarding the location or size of these areas, the location of such areas should be clarified and subject to a consultation process. Such proposed areas may have the potential to impact on areas designated as important landscapes such as the Brecon Beacons National Park or Landscapes of Historic Importance and will need to be fully considered within the revision process. The Local Authority area contains one designated historic

landscape (Gelligaer Common Landscape of Special Historic Interest). We welcome the opportunity to discuss the location of these areas further with your authority.

Council Analysis

The Council welcomes the support of NRW for encouraging renewable energy schemes. However after further deliberation it is now proposed to replace policy SP13 Renewable Energy: Local Areas of Search with two alternative Strategy Policies in respect of Climate Change and a Countywide Policy in respect of Climate Change. The two strategy policies are in respect of Climate Change Mitigation and Climate Change Adaption and they provide for appropriate measures to be undertaken to help the county borough contribute to meeting renewable energy targets and ensure that all new development includes measures to adapt to climate change. . The countywide policy provides the development management criteria to guide and control proposals that seek to address climate change. This countywide policy is further supported by supplementary planning guidance for various forms of renewable energy development e.g. wind turbines, solar.

Recommendation

To agree the proposed change to the strategic policy framework as it relates to renewable energy.

4586.P7 NATURAL RESOURCES WALES

Representation

SP21 - Total Housing Requirements

We note the intention of this policy to provide flexibility and choice over the provision for housing requirements. If the LDP includes this approach in its policies then all allocated land for the 13,640 dwellings must be shown to be deliverable within the plan. Therefore all sites should go through full assessment to ensure the policies are sound.

Council Analysis

All sites have been subject to a rigorous and robust assessment to determine their suitability for allocation for different uses. The Council is fully aware that sites should be realistic and deliverable over the plan period. The Deposit Replacement LDP will contain a housing trajectory indicating when sites are likely to be delivered over the plan period.

Recommendation

The comments be noted

4586.P8 NATURAL RESOURCES WALES

Representation

SP23 – Managing Employment Growth

We note the intention of this policy to provide flexibility and choice over the provision for employment land. If the LDP includes this approach in its policies then all allocated land for the 55 ha of employment land must be shown to be deliverable within the plan. Therefore all sites should go through full assessment to ensure the policies are sound.

Council Analysis

All sites have been subject to a rigorous and robust assessment to determine their suitability for allocation for different uses. The Council is fully aware that sites should be realistic and deliverable over the plan period.

Recommendation

The comments be noted

4586.P9 NATURAL RESOURCES WALES

Representation

Biodiversity

A number of the proposed candidate sites have been identified which support important habitats and species. From assessment work we have undertaken on the candidate sites provided for consultation, 77 sites have the potential to impact directly on Sites of Importance for Nature Conservation. We recommend you consult closely with your Authority's Ecologist for further advice in relation to these sites and your duty under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, to have regard to conserving biodiversity.

Allocation and development of these sites could result in significant erosion of to the biodiversity resource of Caerphilly. We therefore advise they should only be considered for development, when all other suitable options have been explored and exhausted.

Council Analysis

NRW's concern is noted, however all candidate sites submitted have been subject to a rigorous and robust assessment to determine their suitability for allocation for different uses. A detailed countryside and landscape assessment has been conducted as part of this process, which looks at both the ecological and landscape impact that development would have. Only sites where the ecological and landscape impact can be reasonably mitigated, are proposed to be carried forward as allocations in the Deposit Replacement LDP.

Recommendation

The comments be noted

4586.P10 NATURAL RESOURCES WALES

Representation

Ancient Woodland

We have identified 50 proposed candidate sites with potential for direct impacts upon sites supporting Ancient woodland. Planning Policy Wales paragraph 5.2.9 is clear regarding the protection that should be afforded to ancient woodland habitats.

PPW para 5.2.9 "Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage".

We recommend you should screen out those allocations, which would result in unacceptable losses of ancient woodland.

Council Analysis

NRW's concerns are noted, however all candidate sites submitted have been subject to a rigorous and robust assessment to determine their suitability for allocation for different uses. A detailed countryside and landscape assessment has been conducted as part of this process, which looks at both the ecological and landscape impact that development would have. Only sites where the

ecological and landscape impact can be reasonably mitigated, are proposed to be carried forward as allocations in the Deposit Replacement LDP.

Recommendation

The comments be noted

4586.P11 NATURAL RESOURCES WALES

Representation

European Protected Species

There is no reference to the provision of information from site proponents to allow CCBC to carry out a Habitats Regulation Assessment (HRA) where appropriate, or to assess impacts on EPS. This HRA/EPS information is needed to allow consultees to make informed comments and to allow you to carry out your duties as a competent authority with respect to the Conservation of Habitats and Species Regulations 2010, as amended.

A number of the proposed allocations are significant greenfield sites in the open countryside containing habitats with potential to support populations of European Protected Species (EPS).

EPS are given the highest legal protection through British and European legislation and include species such as the dormouse, otter, great crested newt and all our bat species. They are protected under Regulation 41 of the Conservation of Species and Habitats Regulations 2010 (as amended) (The Habitat Regs), which translates the European 'Habitats' Directive (92/43/EEC) into UK law. Where an EPS is present, and a development proposal is likely to contravene the protection afforded to it, a development may only proceed under a licence currently issued by Natural Resources Wales (NRW) under Section 53 of the above Regulations. This licence can only be issued for the purposes of:

'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature, and beneficial consequences of primary importance for the environment.'

Furthermore, the licence can only be issued by NRW on condition that there is 'no satisfactory alternative', and that 'the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. Additionally, Regulation 9 of the Habitat Regs requires public bodies in exercise of their functions, to have regard to and, in respect of enactments relating to nature conservation, to secure compliance with the requirements of the 1992 'Habitats' Directive.

We recommend that proposed allocations with significant EPS potential are subject to appropriate assessment for EPS and if after due consideration allocated, detailed survey and Master planning proposals to ensure compliance with the regulations.

Council Analysis

The Council is fully aware of its duty to comply with legislation in respect of Habitats Regulation Assessment and European Protected Species.

Further a Habitat Regulations Assessment has been undertaken in respect of the Deposit Replacement LDP. The HRA process identified one European site within CCBC's administrative boundary and eleven European sites outside of the boundary potentially within the influence of the LDP. Taking into account the identified sensitivities of these, the findings of the screening for the individual policies, existing evidence and mitigation available (through Plan policies, existing regulatory regimes and lower level planning), the assessment concluded that the Replacement LDP is not likely to have any significant in-combination effects on the identified European sites.

Recommendation

The comments be noted

4586.P12 NATURAL RESOURCES WALES

Representation

Sustainable Development

To ensure that the LDP delivers well designed, sustainable development proposals, we recommend that any proposals are subject to early masterplanning and design work that considers the full range of relevant environmental issues and opportunities.

Many sites contain significant environmentally sensitive features such as important habitats e.g. ancient semi-natural woodland, semi natural grassland. Scheme design work at an early stage will be essential to ensure the long term conservation and enhancement of these habitats as well as help ensure that any figures for housing provision which may be ascribed to the sites are realistic and deliverable.

Council Analysis

NRW's representation is noted in respect of masterplanning and the importance of mitigation against adverse environmental impacts and reflecting this through good design is recognised. Figures for housing provision on allocated sites will take into account any site constraints identified by the site assessment process and this will be reflected in the figures.

Recommendation

The comments be noted

4586.P13 NATURAL RESOURCES WALES

Representation

Flood Risk

A number of the proposed sites are currently subject to flood risk. There is currently insufficient evidence submitted for some sites/proposals to be properly considered and therefore we are not able to advise you that the risks and consequences of flooding have been demonstrated as being acceptably managed.

In accordance with Section 10 of TAN 15 you should undertake a broad level assessment of the consequences of flooding. To facilitate this process we recommend that your Authority undertake a Strategic Flood Consequences Assessment (SFCA) to support the LDP review as early as possible. In the case of candidate sites located within the Welsh Government Development Advice Maps (DAM) Flood Zone C2, paragraph 10.8 of TAN 15 is relevant. 'Sites in zone C' should not be allocated for highly vulnerable development in accordance with the advice set out in paragraph 6.2.....'

Our records indicate that 27 of the candidate sites are situated in or contain areas of land within Zone C2 of the DAM maps. We refer you to Welsh Government's Chief Planning Officer letter dated 9 January 2014.

Your Authority should be satisfied that the flood risk management measures associated with a potential allocation are feasible and practicable. We wish to highlight that a precautionary approach should be adopted. Managing flood risk can have a significant impact on the design, cost and viability of developments. Proposals may need to be phased or developers' contributions may be required to allow development to proceed. The outcomes of an assessment may demonstrate that only part of a site is suitable for development.

Council Analysis

The Council notes the requirements of TAN 15 Development and Flood Risk. The Deposit Replacement LDP will promote a precautionary approach to development in the flood plain in line with national policy and guidance.

Recommendation

The comments be noted

4586.P14 NATURAL RESOURCES WALES

Representation

Sustainable Drainage

Sites which are selected for allocation should incorporate Sustainable Drainage proposals to maintain or provide betterment on existing surface water runoff rates post development. This approach would be in line with paragraph 8.2 of Technical Advice Note 15 'Development and Flood Risk'. Paragraph 8.2 notes that "SUDS can perform an important role in managing run-off from a site and should be implemented, wherever they will be effective, on all new development proposals, irrespective of the zone in which they are located."

There is the potential to reduce run off rates below greenfield rates and attenuate even further to bring about reductions in peak run off times, with consequential improvements to flood risk within the wider catchment.

This approach can realise many other ecosystem benefits such as biodiversity enhancement, improvements to water quality etc through the adoption of natural flood management techniques such as attenuation ponds or wetland features on site.

Council Analysis

The NRW's comments in respect of sustainable urban drainage networks are noted. The Deposit Replacement LDP will include a strategy policy in respect of Climate Change Adaptation, which will ensure that where practical all new development proposals will include measures to adapt to climate change. Further Policy SP9 requires all new developments to contribute to sustainable places and requires sustainable drainage systems to be incorporated in development schemes where appropriate.

Recommendation

The comments be noted

4586.P15 NATURAL RESOURCES WALES

Representation

Foul Water Disposal

Our records indicate that 12 of the candidate sites are situated outside the currently mapped DCWW sewage catchments.

It is essential that there is evidence to demonstrate that suitable infrastructure exists for both water and wastewater in the Plan period. This will help to ensure the delivery of a sustainable strategy and development options for sites/proposals.

The first option for developments discharging 'domestic' sewage is to connect into the public foul sewer where it is reasonable and practicable to do so. The installation of private sewage treatment facilities within publicly sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems. This hierarchical approach is supported by government guidance on non-mains drainage in Welsh Office Circular 10/99 (paragraphs 3 and 4), which stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer.

Where it is not possible to connect into a public sewer, and private sewage treatment / disposal facilities are utilised, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations 2000, they will also require our consent.

We will not normally grant discharge consent for a private sewage treatment system where it is reasonable to connect to the public foul sewer. Likewise, discharges of trade effluent will be expected to connect into the public foul sewer where it is reasonable to do so and agreement can be reached with the sewerage undertaker to issue a trade to sewer consent.

We therefore recommend that Dwr Cymru Welsh Water (DCWW) should be consulted in order to establish whether there is sewerage capacity in that area. Planned upgrades to sewerage infrastructure also need to be taken into consideration and developers should consult with DCWW regarding their Asset Management Plan (AMP) programme. If improvements are needed that are not planned, or if improvements are needed in advance of when they are planned, we recommend that you discuss this with DCWW, as the LDP provides an opportunity to address this at a strategic level by way of developer contributions.

Council Analysis

NRW's comments in respect of foul water disposal are noted. Dwr Cymru Welsh Water have been consulted on all sites. Only those considered to be deliverable within the plan period are proposed to be included as allocations in the Deposit Replacement LDP.

Recommendation

The comments be noted

4586.P16 NATURAL RESOURCES WALES

Representation

Land Contamination

Given the large number of sites and the lack of detailed information relating to past uses, proposed uses and potential risk, it is not possible for NRW to provide detailed comments for all proposed candidate sites. We have provided some limited information in the form of info relating to the proximity of current and historic landfill sites (see annex 2). We expect further information to accompany any further consultations once the number of candidate sites has been reduced following more detailed assessment by your Authority.

Planning Policy Wales takes a precautionary approach to land affected by contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of clean-up (remediation). Where contamination is known or strongly suspected, a desk study, investigation, remediation and other works may be required to enable safe development, for example on historic landfill sites. Minimum requirements for submission with a planning application are a desk study and preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may also be required for submission with a planning application for sensitive land use types or where significant contamination or uncertainty is found. The Local Authority Environmental Health team (Contaminated Land Officer) will hold detailed records on known/potential land contamination. We recommend any potentially contaminated sites provide further information in the form of a desk study as minimum.

Council Analysis

NRW's concerns are noted in respect of contaminated land. The Council has undertaken an assessment as part of the candidate site assessment process to determine the potential for contaminated land. The presence of contaminated land would not necessarily preclude a site from being allocated in the Deposit Replacement LDP, however the Council would have to be confident that site investigation and remediation could be satisfactorily undertaken and that the site is deliverable within the plan period for its identified proposed use.

Recommendation

The comments be noted

2533.P1 THE CITY OF CARDIFF COUNCIL

Representation

Strategy

The City of Cardiff Council supports the strategy to focus growth within the Mid Valleys and Southern Connections Corridor and the objectives to promote sustainable transport and concentrate development in locations, which are accessible by non-car modes. This is preferable to dispersing development across a wider number of smaller sites, which would make securing community infrastructure more difficult.

Council Analysis

The support for promoting sustainable transport and concentrating development in locations which are accessible by non-car modes is welcomed

Recommendation

The support be noted

2533.P2 THE CITY OF CARDIFF COUNCIL

Representation

LDP Vision (Question 1)

The City of Cardiff Council (CCC) thinks the vision could more clearly reflect the importance of sustainable accessibility and movement.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and the Council considers that it is fit for purpose. It should be note that the Vision

sets the scene for the whole of the county borough across all aspects of the environment and does not focus on any particular issue at the expense of others.

Whilst the importance of sustainable accessibility and movement is not explicit in the vision, the Vision itself is underpinned by a series of Key Aims and Objectives, whose role is to interpret the Vision into issue and topic related pieces. Consequently it is important to note that Key Aim G states:

“Provide a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and protects the environment, where public transport, walking and cycling provide real travel alternatives.”

This key aim is further supported by Objectives 8, 16 and 20, which all specifically address the issue of sustainable transport.

The Replacement LDP Vision is also reflects the Vision, Aims and Objectives of the Local Transport Plan (LTP) for the County Borough. The Replacement LDP reflects the following goal from the LTP:

- Protect the environment, by minimising transport emissions and consumption of resources and energy, by promoting walking, cycling, quality public transport, modal shift and minimising demand on the transport system.

And also directly reflects the following Objectives:

- 5 To improve interchange within and between modes of transport.
- 7 To reduce traffic growth, traffic congestion and to make better use of the existing road system.
- 8 To achieve a modal shift towards more sustainable forms of transport for moving people and freight.
- 11 To promote sustainable travel and to make the public more aware of the consequences of their travel choices on climate, the environment and health.

Given this it is considered that the Vision set out in the Replacement LDP does clearly reflect the importance of sustainable transport and accessibility, through its component Aims and Objectives however it could be further emphasised by inserting the word sustainable into the vision as follows:

“Provision of jobs and services throughout the County Borough supported by a modern, well connected, integrated **sustainable** transport system; and...”

Recommendation

That the Vision be modified to include reference to an “integrated sustainable transport system”.

2533.P3

THE CITY OF CARDIFF COUNCIL

Representation

LDP Aims (Question 2)

The aims outlined remain appropriate

Council Analysis

The support is welcomed

Recommendation

The support be noted

2533.P4

THE CITY OF CARDIFF COUNCIL

Representation

Objectives (Question 3)

Cardiff City Council supports the objectives, particularly Objectives 8 and 16. However regarding Objective 16, the objective could be improved by its primary focus being upon effecting modal shift rather than reducing congestion. This would more accurately reflect the Aim B:

“Ensure that new development minimises emissions of greenhouse gases as far as is practically possible in order to mitigate the effects of climate change” and Aim G “Provide a modern, integrated and sustainable transport system that increases opportunity, promotes prosperity and protects the environment; where public transport, walking and cycling provide real travel alternatives”.

Council Analysis

Congestion within the county borough is a significant transport issue at specific locations on the strategic highway network. If left unaddressed congestion will continue and increase throughout the

Replacement LDP period. Consequently the council will need to address the issue as part of its overall transport strategy in the Replacement LDP. Whilst it is accepted that modal shift is a key component in reducing congestion, there are multiple reasons for the congestion within the county borough. As a result it will require a series of integrated measures to appropriately address this issue, rather than focus on a single measure.

The Replacement LDP identifies active travel, sustainable transport and highway improvement measures to realise the aim of reducing congestion, with increasing modal shift being a key aspiration. Reductions in greenhouse gases is achieved through congestion reduction as well as increasing sustainable transport, and promoting a series of integrated measures will deliver a modern integrated and sustainable transport system, which accords with Aims B and G of the Replacement LDP.

The council does not consider that an approach focussed on achieving a modal split target will provide the range of measures required to fully address the issue of improvements to congestion and the environment. Highway improvements are required in both Caerphilly and Maesycwmmmer to redistribute existing traffic patterns and mitigate against the impact from proposed developments. This is particularly important in Caerphilly where the proposed highway improvements will reduce traffic congestion within the Town Centre, so reducing traffic emissions and improving air quality in the Caerphilly Air Quality Management Area.

Consequently it is considered that the Objectives reflect the appropriate position and complement Aims B and G. As such no amendment is proposed.

Recommendation

No amendment be made in respect of this representation

2533.P5 THE CITY OF CARDIFF COUNCIL

Representation

Level of growth (Question 4)

Cardiff County Council supports the strategy.

Council Analysis

The support is welcomed

Recommendation

The support be noted

2533.P6 THE CITY OF CARDIFF COUNCIL

Representation

Employment Land take up (Question 5)

Cardiff County Council supports the use of the historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

The Council welcomes the representor's support for the use of the historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Recommendation

The support be noted.

2533.P7 THE CITY OF CARDIFF COUNCIL

Representation

Strategy Areas (Question 6)

Cardiff County Council supports the three strategy areas identified in the preferred strategy and agrees that they reflect the role and function of settlements in those areas.

Council Analysis

The Council welcomes the representor's support for the three strategy areas identified in the preferred strategy and agrees that they reflect the role and function of settlements in those areas.

Recommendation

The support be noted.

2533.P8 THE CITY OF CARDIFF COUNCIL

Representation

Release of greenfield land in MVC & SCC (Question 7)

Cardiff County Council supports the concentration of major sites in the Mid Valleys and Southern Connections Corridor.

Council Analysis

The Council welcomes the representor's support for the release of greenfield land in the MVC and SCC.

Recommendation

The support be noted.

2533.P9 THE CITY OF CARDIFF COUNCIL

Representation

Strategic Sites (Question 8)

Cardiff County Council agrees with the approach of allocating 2 strategic sites.

Council Analysis

The Council welcomes the representor's support for the allocation of 2 strategic sites.

Recommendation

The support be noted.

2533.P10 THE CITY OF CARDIFF COUNCIL

Representation

Sustainable Transport Delivery

Cardiff County Council believes it is important to ensure that developments in the Mid Valleys area, Southern areas and on major sites are delivered in conjunction with infrastructure and measures that provide sustainable travel choices from the early stages of site occupation. Sustainable transport solutions need to be deliverable within the plan period as any delay in providing sustainable travel options is likely to result in developments becoming car based.

Council Analysis

It is agreed that the development proposed in the detailed Deposit Replacement LDP will need to be delivered in conjunction with infrastructure measures that provide sustainable travel choices at the earliest opportunity

Paragraph 5.37 of the Sustainable Urban Network Growth Strategy states *“As a general principle development will be directed to locations that offer a choice of transportation.”*, and Paragraph 5.38 states *“Whilst the strategy is very much focused on measures to encourage the greater use of the public transport system, . . .”*.

It is clear that the Preferred Strategy has sustainable transport at its heart and seeks to ensure that all proposed development will have sustainable travel choices at the earliest opportunity and this will need to be reflected in the detailed Deposit Replacement LDP.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2533.P11 THE CITY OF CARDIFF COUNCIL

Representation

Strategic Highway Network Proposals

It is also important that measures to support sustainable travel and modal shift are not undermined by the provision of new highway capacity, which could induce additional demand for car journeys.

Council Analysis

The Preferred Strategy sets out three Strategic Network Proposals as part of the overall Development Strategy, namely:

- 1 A469 Resilience Route
- 2 Maesycwmmmer Bypass
- 3 Caerphilly South Eastern Bypass

In identifying these proposals it is not the intention to increase highway capacity, individually or cumulatively. The A469 Resilience Route is a Welsh Government supported proposal that is a response to the catastrophic 8-week closure of the A469 in February 2014 due to a large land slip, which isolated the communities north of Troedrihiwfuwch from the remainder of the county borough. Due to the nature and topography of the land it is inevitable that the road would be subject to further slippage and potential closures. As a result this proposal is intended to maintain accessibility for the northern communities rather than provide increased capacity.

The Maesycwmmmer Bypass is a response to the long-standing problem of the pinch point in the main strategic east-west highway connection in the mid valleys at Maesycwmmmer. The Bypass is proposed as the most appropriate solution to the issue, redirecting traffic that goes south down the A469 from the east west traffic along the A472, reducing traffic through Maesycwmmmer, so alleviating the problem.

Similarly, in the longer term, the full Caerphilly South East Bypass will complete the ring road around Caerphilly, with the intention of providing alternative routes to the A470 via Nantgarw and to Newport via Bedwas Road. The Caerphilly Air Quality Management Area was designated in 2010, due to air quality falling below required standards. In order to address the air quality issue the Caerphilly Air Quality Action Plan was produced and this identifies the Bypass as one of a suite of measures required to alleviate the air quality issues in the town centre.

All three proposals are being proposed as measures to overcome specific, existing issues and make more effective use of the highway network rather than being allocated purely to accommodate future traffic growth. The plan also proposes many sustainable transport improvements which reflects Paragraph 5.45 of the Preferred Strategy which states: *“Caerphilly has the second highest out-migration level in South Wales, with over 15,000 net car-borne out-movements each day. . . . Measures therefore need to be identified to increase the number of commuting trips using sustainable modes, rather than the car. . . . There is a pressing need to ensure that the opportunities to increase park & ride provision, particularly in Llanbradach are pursued to ensure that residents of these sites are able to commute by train.”*

The Replacement LDP proposes a range of sustainable transport proposals to provide alternatives to the car for commuting, local and town centre trips. However, in reality significant modal shift will

only take place where sustainable transport modes become more attractive than using the car. Whilst the Deposit Cardiff LDP proposes a raft of proposals to realise 50:50 modal split within the city limits, these address short distance trips within the city itself. Such low-cost, short-distance trips are more easily dissuaded than the longer and more costly trips associated with commuting from neighbouring authorities into the city. From the Caerphilly perspective the cost of commuting by bus or train is significantly higher than the perceived cost of driving and parking in the city. Consequently, whilst the council can provide greater access to sustainable transport, it is unlikely to be seriously taken up until the controlling measures within the city reach the point where sustainable transport is faster, more reliable and cheaper than travelling by car. At the present time this is not the case. The council will continue to monitor the position and will proactively identify opportunities for increased sustainable transport provision where they arise.

The council is satisfied that the proposals for highway improvements seek to address existing issues and will not undermine the large number of proposals that seek to encourage and deliver modal shift to sustainable transport modes.

Recommendation

The comments be noted and no amendment be made in respect of this representation

2533.P12 THE CITY OF CARDIFF COUNCIL

Representation

South East By-pass

Cardiff County Council strongly questions the rationale of providing a south east by-pass of Caerphilly Town Centre as described in paragraph 7.46. This scheme will simply fuel demand for car based trips into Cardiff via the A469 corridor.

Council Analysis

The Air Quality Action Plan for the Caerphilly Town centre Air Quality Management Area identifies the provision of a South East Bypass for Caerphilly as part of its set of measures aimed at alleviating the air quality issues in the area. It is accepted that the Bypass alone will not relieve the problem, but it will significantly contribute towards it as it will redistribute the existing traffic away from the town centre, particularly the through traffic using the town centre to access the A469 Mountain Road to Cardiff. The Bypass, therefore, is required on air quality grounds and its function is to redistribute existing through traffic away from the town Centre. It is not the case that the Bypass is being provided to accommodate additional car borne traffic to Cardiff.

The council have undertaken cumulative impact modelling of the Caerphilly Basin highway network and the impact of the proposed LDP development for the years 2021, 2026 and 2031. The results of this study reflect the view that the Bypass acts to redistribute existing traffic patterns.

The results of the study do not support the claim by Cardiff council that the Bypass will fuel demand for car based trips to Cardiff via the A469 corridor. The do-nothing (no proposed development, no transport improvements) scenario from the study identifies that the stretch of Mountain Road south of the Mountain Road/Watford Road junction will be below capacity in the 2031 A.M. Peak and within capacity in the 2031 P.M. Peak. In the proposed development and full bypass scenario the same link is below capacity in both peak periods. Therefore the traffic impact of the proposed LDP allocations with the bypass is less than the impact of natural traffic growth on the unaltered network.

Whilst the provision of the bypass will realise less impact upon the A469 link to Cardiff, the Replacement LDP only proposes the first phase of the Bypass from the Caerphilly Business Park Roundabout to Mountain Road. This is primarily due to the issue of the realism of delivering the whole bypass in one go. There is much more certainty over delivery of both phases if they are addressed consecutively rather than as one project and therefore the Plan allocates only the first phase of the bypass.

The results of modelling the proposed LDP development with just the first phase of the bypass sees a significant drop in traffic in the town centre, whilst the southern Mountain Road link is below capacity in the 2031 A.M. Peak and within capacity at the 2031 P.M. Peak, albeit at a slightly higher level than the do-nothing scenario.

So whilst the Replacement LDP proposals will realise a minimal increased impact over the do-nothing scenario, the benefits from reducing traffic in the town centre far outweighs this. In addition the impacts of the first phase of the bypass are only temporary as it is the council's intention to realise the second phase of the bypass, with its associated betterment, as soon as possible after the provision of the first phase.

In general terms the most significant impact of the Bypass will be realised on the northern Bypass, particularly around Penrhos roundabout in the west and the Pwllypant and Bedwas roundabouts in the east. This reflects the redistributing of traffic that would have moved through the town centre around the completed ring road, and is not a reflection of increasing traffic demand due to increased capacity.

It should be noted that the cumulative impact study was undertaken on a worse case scenario (higher densities, higher dwelling numbers) than is actually being proposed in the Replacement LDP. As a result the modelled levels of traffic are likely to be significantly higher than those realised through the proposed development. In addition the modelling makes no assumption in respect of modal shift, which is expected to increase throughout the plan period. Large numbers of dwellings are located within active travel distances to sustainable transport opportunities and hubs, which will promote sustainable transport use.

Finally the Cardiff LDP identifies bus park and ride facilities at strategic points on the periphery of the administrative area to facilitate modal split at the city boundary. Whilst the intention is to realise

modal split within Cardiff, users of these facilities will, themselves have to drive to get to one of them, otherwise the parking would not be required. It is also the case that the Cardiff LDP is allocating land for 40,000 new jobs within the city. Providing this level of additional employment will undoubtedly fuel a significant increase in daily commuting from neighbouring authorities, much of which will be car-borne either driving into the city itself or to use one of the park and ride facilities within the city. The overall result of these policies is that Cardiff itself will be the biggest driver in fuelling demand for increased car borne trips, not the proposals in the Caerphilly LDP, which seeks to manage all aspects of travel to maintain an efficient and effective transport network.

The proposed Caerphilly South East Bypass will redistribute existing traffic and will not fuel demand for car borne trips to Cardiff, which is more likely to be realised through demand fuelled from Cardiff's own LDP proposals. As a result it is not proposed to make a change to the proposed allocation.

Recommendation

No amendment be made in respect of this representation

2533.P13 THE CITY OF CARDIFF COUNCIL

Representation

Increased Highway Capacity in the North

Cardiff County Council are concerned that proposed increases in highway capacity in the north of the County Borough to facilitate "massive commuter flows from further north" (paragraphs 5.42 and 7.47) will result in highway congestion in the south of the County Borough and perpetuate demand for car-based commuting into Cardiff.

Council Analysis

The residents of the county borough make over 35,000 out-commuting trips each day, representing nearly 50% of all commuting trips made by the county borough residents. It should also be noted that a lot of these trips originate in the Mid Valleys Corridor and the Heads of the Valley area. In terms of the county borough this does represent massive commuter flows from north of the Caerphilly Basin, which is the point being made by the LDP in the quoted paragraphs. But it should be noted that this is an existing situation, not one being either created or exacerbated by the Replacement LDP.

It should be noted that this is not exceptional and significant out-commuting flows are also realised by other local authorities, including Cardiff. Caerphilly has a net out-commute of 15,000 trips,

meaning there are a corresponding 20,000 in-commuting trips into the county borough from other authorities.

The choices that people make in respect of where they live, where they work and how long and far they commute each day are personal ones. It is not possible to deliver a situation where everyone in an authority works in the same authority, although most development plans do seek to realise some form of economic population/employment opportunity balance. Therefore in- and out-commuting are naturally occurring phenomena that development plans need to manage through their policies and allocations.

The Replacement LDP includes three strategic highway network schemes that are required to address existing issues, i.e.:

- . A469 Resilience Route – required to provide resilience in the highway network north of New Tredegar
- . Maesycwmmmer Bypass – required to alleviate the existing congestion problems suffered in Maesycwmmmer, and
- . Caerphilly South East Bypass – Required to redistribute existing town centre traffic to assist in alleviating air quality issues in Caerphilly town centre’s Air Quality Management Area.

The LDP also proposes network efficiency improvements to the strategic highway network, to relieve existing and projected congestion points on the strategic network.

None of these measures are designed to fuel or support increased car-borne travel to Cardiff. In fact the LDP includes numerous sustainable transport allocations aimed at increasing modal shift and promoting active travel.

The proposals within the Cardiff LDP itself will have the effect of perpetuating car borne travel to Cardiff, as the provision for 40,000 new jobs can only fuel the demand to commute to Cardiff from neighbouring authorities. In addition to this the Cardiff LDP also proposed Park & Ride facilities located at strategic gateways to the city. Being located on the edge of the city the park and ride facilities will attract car borne traffic from neighbouring authorities and increasing the capacity for modal switch will only encourage additional car borne trips.

A reality check is also required in respect of the issue of modal shift, as it only occurs where sustainable alternatives are more attractive than the car. This is often skewed as things like fuel costs are not necessarily taken into account when considering the cost of car borne travel. This means that car borne travel is often understated and a fair comparison with sustainable modes is not made. Consequently, In order to achieve modal shift, sustainable transport options have to be significantly better than the car in order to realise the position where sustainable transport is perceived as the better option. This is far easier to achieve for the short distance, low cost trips within Cardiff City, but is significantly harder for the longer distance and higher cost trips from other authorities in the region.

For Caerphilly county borough the reality is that the car will continue to be the dominant mode as car travel is perceived to be the most convenient form of travel to Cardiff. These perceptions will

not change until significant obstacles to car borne travel to and within the city are implemented and their effects felt. As a result it would be irresponsible of the LDP not to manage the road hierarchy to ensure the most efficient and effective use of the highway network, whilst seeking to promote sustainable transport to increase modal shift. This is what the transport policy framework seeks to do.

In conclusion, the highway proposals in the Replacement LDP seek to manage traffic levels and redistribute travel patterns to alleviate congestion and reduce adverse air quality impacts through a more efficient highway network. The council refutes the assertions that these measures will perpetuate car borne travel. Indeed there are wider factors that have significant bearing on the perception of car borne travel and some of these arise from the emerging Cardiff LDP. Overall the council considers that the transport allocations and policies provide an appropriate framework for addressing the many transport issues in a comprehensive and integrated manner, whilst ultimately realising modal shift to sustainable transport.

Recommendation

No amendment be made in respect of this representation

2533.P14 THE CITY OF CARDIFF COUNCIL

Representation

Cardiff County Council believe that the Caerphilly LDP needs to maximise provision of transport measures outside the city's boundary, in particular park and ride facilities to intercept flows towards the A469 and A470 to support sustainable commuting and help to ease peak time pressures on Cardiff's network.

Council Analysis

Maximise Park & Ride to intercept flows

It is agreed that the Replacement LDP needs to maximise the provision of sustainable transport measures and address the issue of car borne travel. Consequently the Replacement LDP is proposing increases in Park and Ride provision at Ystrad Mynach and a significant increase at Llanbradach, whilst proposing new Park & Ride provision at new stations in Nelson and Crumlin. In addition to this the council is working together with neighbouring authorities in identifying sites for Park and Car Share on sites close to the major links to Cardiff and Newport.

There are a number of stations that are physically constrained and it is not currently possible to make additional P&R provision at them, namely: Caerphilly, Aber and Hengoed. As such the LDP goes as far as it is can in providing additional park and ride provision.

In addition to this the Replacement LDP also identifies two former passenger rail routes for reinstatement for passenger transport.

The Replacement LDP makes significant provision for modal shift and to address car borne travel out of the county borough. As a result it is not proposed to make a change to the proposed allocation.

Recommendation

The comments be noted but no amendment be made in respect of this representation

2533.P15 THE CITY OF CARDIFF COUNCIL

Representation

Paragraph 8.19

Cardiff County Council would comment on paragraph 8.19 which states: “To stem growing levels of traffic into Cardiff the City Council intend to operate gateways on the main routes into the city to slow the influx of traffic into Cardiff resulting in waiting and queuing at junctions”. This statement is misleading as it appears to imply that the flow of traffic coming into Cardiff will be impeded at the City boundary with Caerphilly CB. This misinterprets the transport strategy supporting Cardiff’s LDP which is not to establish gateways, but to introduce bus priority measures along key corridors such as the A469 and A470 within the city boundary. These measures will include bus lanes and gating at signalised junctions to improve bus journey times and service reliability, making bus travel a more attractive option for trips within Cardiff and trips from neighbouring areas

Council Analysis

The statements made in paragraph 8.19 were written following a meeting between Cardiff City and Caerphilly county borough transport and planning officers, where this issue was discussed. The statements were made in good faith and represented the position that the Caerphilly County Borough officers perceived. It is acknowledged that the position has changed somewhat and additional information in respect of the Transport Strategy for the Cardiff LDP has been published and therefore it is acknowledged that the interpretation in Paragraph 8.19 is not accurate. Care will be taken to represent the position correctly in the Deposit Replacement LDP.

The intention of the paragraph, however, was the need for the Caerphilly LDP to address the implications of the Cardiff measures and not to imply criticism of the Cardiff measures themselves.

The measures will, however, have the implication of increasing journey times for car borne journeys along the A470 and the Deposit Replacement LDP will need to consider and address these implications.

Recommendation

The comments be noted and the Deposit Replacement LDP and associated Background Paper be worded to reflect the current position.

2533.P16 THE CITY OF CARDIFF COUNCIL

Representation

Paragraph 8.19

Cardiff County Council are particularly keen to build on our recent discussions of these matters with planning and transport colleagues in Caerphilly County Borough Council and collaborate in the development of effective cross-boundary measures which are mutually beneficial and support the emerging City Region agenda.

Council Analysis

The council welcome the comments regarding continuing co-operation between the councils in addressing the issues of sustainable transport. Caerphilly council has held further cross-boundary meetings with the respective officers from Cardiff City Council prior to the finalisation of the Deposit Replacement LDP.

The council would also welcome continued discussions with the Cardiff Officers throughout the Replacement LDP process and beyond and will look to set up meetings accordingly.

Recommendation

The comments be noted and the desire to continue co-operating on sustainable transport issues is welcomed and encouraged.

4647.P1 THE GYPSY COUNCIL

Representation

Gypsy & Traveller Sites

The Gypsy Council suggest that rather than identifying just one site, that a variety of type of provision be considered, with small sites of different sizes, with an openness to proposals by private developers as well as council or social housing provision.

The Gypsy Council particularly like the idea of integrating Gypsy and Traveller site provision with other residential accommodation.

The preference is for a number of small sites integrated within existing settlements, as large sites can become unmanageable. The Gypsy & Traveller community wish to be integrated with society.

Council Analysis

The comments made by the Gypsy Council are noted. Part 3 of the Housing (Wales) Act 2014 requires local authorities in Wales to undertake a Gypsy and Traveller accommodation assessment (GTAA) and, where an unmet need is identified, make provision for residential site pitches.

The Council has carried out a GTAA in accordance with statutory guidance issued by Welsh Government. As part of the assessment process the council has spoken with as many members of the Gypsy Traveller community living in the county borough as possible. The completed GTAA will have informed the Gypsy & Traveller Policy contained within the Deposit Replacement LDP.

Notwithstanding the GTAA, the council is required by Welsh Government to undertake a separate assessment for Gypsies and Travellers due to the very low number living in the county borough. This has been undertaken as part of the Local Housing Market Assessment April 2015. A completed assessment of housing needs, of the settled community is contained within this document.

Recommendation

The comments be noted

1593.P1 GWENT WILDLIFE TRUST

Representation

LDP Vision (Question 1)

Gwent Wildlife Trust strongly objects to the new Vision Statement, in that the environment is not afforded equal importance to social and economic needs, and only referred to in terms of access.

The environment within the Caerphilly Borough should be afforded protection for its intrinsic value, as well as recognised for the wide range of ecosystem services that it provides.

This is supported by Caerphilly Delivers, which states that ‘Sustainable Development where we promote social justice and equality of opportunity and enhance the natural and cultural environment and respect its limits’ is a guiding principle. Aim A of the LDP is to ‘protect the environment as a whole’, which is not reflected in the new vision.

It should also be noted that protection and enhancement of the environment will have impacts across several SIP themes – prosperous Caerphilly, Safer Caerphilly, Healthier Caerphilly and Greener Caerphilly. In addition to Aim A, protection and enhancement of the environment will contribute to Aims B, D, G, H and L.

We therefore propose the following amendments:

The Development Strategy for Caerphilly County Borough will capitalise on our strategic location at the heart of the Cardiff Capital Region. It will ensure that by 2031 the social, economic and environmental needs of all residents and business are met through the:

- Provision of a wide range and diversity of sites that will deliver high quality and appropriately located homes, jobs and services supported by modern integrated transport provision; and
- Sustainable regeneration of the historic environment and our unique towns and villages.
- Protection and enhancement of the natural environment. Where appropriate, access to the surrounding countryside and our natural environment will be encouraged and will complement the provision of a strategic network of recreation, leisure and community facilities that: are easy to access; encourage healthy active lifestyles; and promote the well being of residents and visitors alike.

We argue that a healthy environment is a ‘need’ for people and business within the borough. From the very basic need for air, water and food, to the less quantifiable, but no less important need for the sense of place and other cultural and spiritual qualities that the natural environment provides.

Planning Policy Wales states that ‘The planning system has an important part to play in meeting biodiversity objectives by promoting approaches to development which create new opportunities to enhance biodiversity, prevent biodiversity losses, or compensate for losses where damage is unavoidable. Local planning authorities must address biodiversity issues, insofar as they relate to land use planning, development plans and development control decisions.’ Gwent Wildlife Trust believes that this important function of the local development plan should be fully reflected in the Vision Statement.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and the Council considers that it is fit for purpose. Notwithstanding this, it is

acknowledged that the Vision could be strengthened and thus it is proposed that it be amended to reflect the respondent's comment.

Further, it is important to note that the vision is supported by key aims and objectives and as such should be read in conjunction with them. Key Aim A states:

"Protect the environment as a whole whilst balancing the need for development with the need to conserve valuable resources."

This key aim is further supported by Objectives 1, 2, 3, 4, 5, 6, 7, 8, 11, 12, 13, 14, 15, 20 & 24.

Recommendation

That the Vision be amended to read:

"Strategic Vision for 2031

The Development Strategy for Caerphilly County Borough will capitalise on our strategic location at the heart of the Cardiff Capital Region. It will ensure that by 2031 the social, economic and environmental needs and well being of all residents and business are met through the:

- ***Provision of a wide range and diversity of housing sites that will deliver high quality and appropriately located homes to support the planned expansion of the Principal Towns of Ystrad Mynach, Blackwood and Caerphilly; and***
- ***Provision of jobs and services throughout the County Borough supported by a modern, well connected, integrated sustainable transport system; and***
- ***Sustainable regeneration of our historic environment and our unique network of well connected towns and villages.***
- ***Protection and enhancement of the natural environment. Where appropriate access to the surrounding countryside and our natural environment will be exploited, and will complement the provision of a strategic network of recreation, leisure and community facilities that: are easy to access; encourage healthy active lifestyles and promote the well being of residents and visitors alike."***

1593.P2 GWENT WILDLIFE TRUST

Representation

LDP Aims (Question 2)

Gwent Wildlife Trust strongly supports the stated Aims, particularly Aim A and B.

We would like to add the aspiration to enhance biodiversity, as new development can contribute to biodiversity recovery by creating new habitats and improving ecological connectivity. This is important if the planning system is to achieve the 'net benefit for biodiversity conservation' as advocated in TAN 5. It also states that 'small scale opportunities for habitat creation and enhancement can be significant and can build into major contributions over time' indicating that every development has a potential contribution to make. This is already supported within the LDP in Objective 13.

We therefore suggest an amendment to Aim C:

Underpin all development with the principle of good design that meets a diversity of needs; which uses resources efficiently; integrates biodiversity and which makes adequate provision for recycling and waste management.

Council Analysis

The Council welcomes Gwent Wildlife Trust's support for Aims A & B. Further it is agreed that Aim C would be strengthened by the inclusion of reference to biodiversity.

Recommendation

The comments are noted and the Aim to be amended accordingly

1593.P3 GWENT WILDLIFE TRUST

Representation

Objectives (Question 3)

Gwent Wildlife Trust strongly supports the stated objectives particularly 2, 3, 4, 5, 7, 8, 11, 12, 13, 14 and 16.

Council Analysis

Gwent Wildlife Trust's support for objectives 2, 3, 4, 5, 7, 8, 11, 12, 13, 14 and 16 is welcomed.

Recommendation

The support be noted

1593.P4 GWENT WILDLIFE TRUST

Representation

Level of growth (Question 4)

In terms of overall approach, it is important to note that the principles of sustainable development include respect for environmental limits. Therefore, whilst the current approach is to ask how the borough can accommodate the growing population; at some point, the council will need to ask how much growth the borough can reasonably accommodate without compromising its natural resources. A model of increasing growth (both for population and economy) will not be sustainable in the long term.

Council Analysis

The comments in respect of growth are noted. However due consideration has been given to the scale of growth and the county borough's environmental limits over the plan period.

Recommendation

The comments be noted

1593.P5 GWENT WILDLIFE TRUST

Representation

Release of greenfield land in MVC & SCC (Question 7)

A dispersed pattern of growth, if supported by an integrated transport system that reduces reliance on private cars, could result less pressure on natural resources.

However, much depends on the specific sites allocated for development, and the design of the developments themselves. It is of paramount importance that allocations and applications are subject to rigorous environmental assessment – both to protect existing biodiversity and to maximise the potential enhancement that can be delivered.

Council Analysis

The fact that the representor is generally in support of the release of greenfield land for development where it is supported by an integrated transport system is welcomed.

Recommendation

The support be noted

1593.P6 GWENT WILDLIFE TRUST

Representation

Strategic Sites (Question 8)

Whilst we understand that strategic sites are attractive to developers, and can be used to deliver community benefits, Gwent Wildlife Trust must object to the proposed strategic sites.

Council Analysis

The Representor objects to the inclusion of strategic sites due to their potential negative environmental impact. Each strategic site has been subject to a robust assessment to determine their suitability or otherwise for development. Where ecological or landscape issues have been identified, the Council will require the developer to suitably mitigate against any negative effect of development through measures such as design, the integration of biodiversity etc. Supplementary Planning Guidance will be produced for each strategic site that will be subject to public consultation in due course.

Recommendation

The objection be noted and no amendment be in respect of this representation

1593.P7 GWENT WILDLIFE TRUST

Representation

MVC - Maesycwmmmer – this allocation could negatively affect 2 SINC, and several areas of ancient semi-natural woodland (ASNW). Our records indicate presence of Great Crested Newt nearby, and suitable habitat exists for Dormouse and Marsh Fritillary. There is also high potential for other protected and priority habitats and species to be present. As the development would include a major road, there will also be negative impacts on ecological connectivity.

Council Analysis

The Representor objects to the inclusion of the MVC strategic site due to the potential negative environmental impact. The strategic site has been subject to a robust assessment to determine its suitability or otherwise for development. It is acknowledged that the site has some areas of ecological and landscape value and the Council will require the developer to suitably mitigate against any negative effect of development through measures such as design, the integration of biodiversity etc..

Supplementary Planning Guidance will be produced and this will be subject to public consultation in due course.

Recommendation

The comments be noted and no amendment be made in respect of the representation

1593.P8 GWENT WILDLIFE TRUST

Representation

SCC – Ness Tar/Caerphilly Golf Course - this allocation could negatively affect the Warren Drive SINC, and is adjacent to several areas of ancient semi-natural woodland (ASNW) and the Caerphilly Common SINC. Our records indicate presence of Dormouse nearby. There is also high potential for other protected and priority habitats and species to be present. It should particularly be of note that derelict industrial sites can support rare species, particularly invertebrates, and may qualify as the S42/Priority habitat, Open Mosaic Habitat on previously developed land.

Council Analysis

The Representor objects to the inclusion of the strategic site due to the potential negative environmental impact it may have. The site has been subject to a robust assessment to determine their suitability or otherwise for development. It is acknowledged that the site has some areas of ecological and landscape value and the Council will require the developer to suitably mitigate against

any negative effect of development through measures such as design, the integration of biodiversity etc..

Supplementary Planning Guidance will be produced that will be subject to public consultation in due course.

Recommendation

The comments be noted and no amendment be made in respect of the representation.

1593.P9 GWENT WILDLIFE TRUST

Representation

Gwent Wildlife Trust supports the opening of new rail lines and promotion of public transport, and will work with the LPA to ensure that these schemes have a minimal overall impact on biodiversity. We are concerned, however, that there are several new road schemes proposed. As the LDP aims to encourage less reliance on the private car, this seems contrary to the aims and objectives to reduce greenhouse gas emissions. New roads are well known to increase car usage, therefore we expect that if any road scheme is progressed, it must be fully justified by detailed evidence, and must also be complemented by considerable investment in public transport, walking and cycling.

Council Analysis

Gwent Wildlife Trust's support for the opening of new rail lines and promotion of public transport is welcomed. Whilst the strategy is very much focused on measures to encourage the greater use of the public transport system, there remain parts of the county borough that also require investment in highway infrastructure and this is particularly the case in the Heads of the Valleys Regeneration Area where there is a need to increase the resilience of the area to the impact of disruption caused by the closure of sections of the A469. Similarly there is a pressing need to improve the network through Maesycwmmmer which remains a pinch point on the A472 strategic highway route between Blackwood and Ystrad Mynach; and the Caerphilly Basin where there is a pressing need to ease congestion and alleviate air pollution in the town. Improvements to highway infrastructure are required in order for the county borough to function effectively, the Council does not consider that this will perpetuate demand for car based commuting, however the Council will be looking for commensurate measures such as increased park and ride facilities, increased bus network provision, introduction of additional rail facilities, etc..

Recommendation

The comments be noted and no amendment be made in respect of this representation

1593.P10 GWENT WILDLIFE TRUST

Representation

Gwent Wildlife Trust has found it difficult to match the candidate sites within the register to the proposals maps. As many members of the public will only be interested in allocations in their local community, it is difficult to see how they would be able to judge how these proposals would affect them. The candidate sites are not referenced in the main document, and those carried through from the adopted LDP are not indicated. Despite communications with the LDP team, there are still areas of confusion, and we are not able to comment on all of the allocations.

Council Analysis

The Council produced a candidate sites register as part of the Preferred Strategy Consultation. The candidate sites register set out sites submitted on a ward by ward basis for the very purpose that residents and members of the public would easily be able to view those sites submitted within their local community. Candidate sites are not referenced within the Preferred Strategy document as they are sites submitted by landowners and members of the public for consideration for inclusion and are not allocations proposed by the Council. Further to a robust assessment sites are assessed to determine if they are suitable for inclusion in the plan i.e. are they in accord with the preferred strategy of the plan and are they acceptable in planning terms. Subject to a satisfactory assessment on both measures sites are further considered in terms of their suitability or otherwise for inclusion in the Deposit Replacement LDP. Not all sites that are potentially suitable will be needed to deliver the planned growth identified by the preferred strategy. Consultation on the Deposit Replacement LDP will afford the respondent an opportunity to comment on any aspect of the Replacement Plan and on all of the proposed allocations that are promoted by the Council.

Recommendation

The comments be noted

1593.P11 GWENT WILDLIFE TRUST

Representation

Unfortunately, Gwent Wildlife Trust is not able at this time to comment on the individual sites within the Candidate Sites Register. We urge the council to carry out environmental assessments of these sites at the earliest possible stage, as many may not comply with national and local biodiversity policies. As a general principle, Gwent Wildlife Trust will object to any of the following:

- Development that has a negative impact on protected sites (SAC, NNR, SSSI, or SINC)
 - Development that has a negative impact on protected species (European or national)
 - Development that has a negative impact on S42/Priority Habitats and Species
 - Development that compromises delivery of the Local Biodiversity Action Plan.
-

Council Analysis

The concerns of Gwent Wildlife Trust are noted. The emerging plan and its allocations will be subject to a Strategic Environmental Assessment, Sustainability Appraisal and a Habitats Regulations Assessment (HRA) in accordance with the EC Habitats Directive (92/43/EEC). The EC Habitats Directive requires that the impacts that the LDP may have on European designated sites of conservation importance need to be assessed and where necessary, mitigated or minimised. Furthermore, each candidate site has been subject to a rigorous assessment as part of the site assessment process, detailed expert input has been provided by a number of service areas within the Council, including Environmental Health, Highways & Engineering and Countryside & Landscape Services.

Recommendation

The comments be noted

1593.P12 GWENT WILDLIFE TRUST

Representation

Strategy Policy 9

Gwent Wildlife Trust strongly supports SP9

Council Analysis

Gwent Wildlife Trust's support for Policy SP9 is welcomed.

Recommendation

The support be noted

1593.P13 GWENT WILDLIFE TRUST

Representation

Strategy Policy 16

Gwent Wildlife Trust strongly supports SP16.

Council Analysis

Gwent Wildlife Trust's support for Policy SP16 is welcomed.

Recommendation

The support be noted

1593.P14 GWENT WILDLIFE TRUST

Representation

Strategy Policy 19

Gwent Wildlife Trust strongly supports SP19.

Council Analysis

Gwent Wildlife Trust's support for Policy SP19 is welcomed.

Recommendation

The support be noted

1593.P15 GWENT WILDLIFE TRUST

Representation

Strategy Policy 11

Gwent Wildlife Trust would like to see reference to biodiversity conservation within Planning Obligations (SP11), as this can be a useful mechanism to secure delivery of biodiversity benefits.

Council Analysis

The Representor wishes for biodiversity conservation to be added as a criterion under Strategy Policy 11 Planning Obligations. Whilst the comment is noted, the list of obligations contained in Policy SP11 is not designed to be exhaustive and the fact that this is not listed would not prevent these measures being pursued through Planning Obligations.

Recommendation

No amendment be made in respect of this representation

1593.P16 GWENT WILDLIFE TRUST

Representation

Strategy Policy 1 Development Strategy – Development in the Heads of the Valleys Regeneration Area

Gwent Wildlife Trust strongly objects to the exclusion of natural heritage from SP1 and SP2. We welcome objective SP3–G, but its absence from SP1 and SP2 implies that the natural heritage within the HOVRA and MVC is somehow less valued.

Council Analysis

The representor’s concern regarding the absence of criterion G, “protect the natural heritage from inappropriate forms of development” from Policy SP1 and SP2 is noted. This criterion was specifically added under SP3 as the Southern Connections Corridor is under tremendous pressure for development, with very few brownfield sites remaining. Whilst criterion G has not been added to policies SP1 & SP2, the Council consider that sufficient regard is given to the conservation of natural

heritage by Strategy Policy SP16 which applies to the whole of the County Borough. Strategy Policy SP16 states:

“The Council will protect, conserve, enhance and manage the natural heritage of the County Borough in the consideration of all development proposals within both the rural and built environment.”

Recommendation

No amendment be made in respect of this representation

1593.P17 GWENT WILDLIFE TRUST

Representation

Strategy Policy 2 Development Strategy – Development in the Mid Valleys Corridor

Gwent Wildlife Trust strongly objects to the exclusion of natural heritage from SP1 and SP2. We welcome objective SP3–G, but its absence from SP1 and SP2 implies that the natural heritage within the HOVRA and MVC is somehow less valued. Given the location of the Aberbargoed SAC and NNR within the MVC, this is clearly not the case.

Council Analysis

The representor’s concern regarding the absence of criterion G, “protect the natural heritage from inappropriate forms of development” from Policy SP1 and SP2 is noted. This criterion was specifically added under SP3 as the Southern Connections Corridor is under tremendous pressure for development, with very few brownfield sites remaining. Whilst criterion G has not been added to policies SP1 & SP2, the Council consider that sufficient regard is given to the conservation of natural heritage by Strategy Policy SP16 which applies to the whole of the County Borough. Strategy Policy SP16 states:

“The Council will protect, conserve, enhance and manage the natural heritage of the County Borough in the consideration of all development proposals within both the rural and built environment.”

Recommendation

No amendment be made in respect of this representation

1593.P18 GWENT WILDLIFE TRUST

Representation

Strategy Policy 16 – Conservation of Natural Heritage

Gwent Wildlife Trust notes with concern that the monitoring indicators for SP10 in the current LDP (which will be SP16 in the Replacement LDP) have been triggered for two consecutive years. Although the AMR reports concluded that the policy was functioning, Gwent Wildlife Trust is concerned that dismissing this trigger could lead to an approach whereby small losses of biodiversity are discounted, when the cumulative impact could be significant in the long term.

Council Analysis

The concerns of Gwent Wildlife Trust are noted and whilst monitoring has indicated that the number of planning applications that are resulting in the loss of areas of natural heritage is increasing, the loss is negligible and on balance the policy framework is affording significant protection to those areas that are valued. The Deposit Replacement LDP will seek to further enhance the natural heritage of the area through a strengthening of planning policy to enhance the natural heritage as an integral part of new development.

Recommendation

The comments be noted

1448.P1 MINERAL PRODUCTS ASSOCIATION

Representation

Strategy Policy 14 - Minerals Safeguarding

The Minerals Product Association considers that Policy SP14 is confusingly headed 'Minerals Safeguarding' whilst the policy introduction says that 'The Council will contribute to the regional demand for a continuous supply of minerals by:'

Paragraph B then goes on to mention keeping a minimum 10-year landbank which only applies to crushed rock aggregates in national policy. If so, then there is no other strategic statement about other important minerals, or indeed any distinction between different types of rock.

The policy is deficient in other ways. It needs to separate out safeguarding which is a resource protection issue and supply which is a provision issue. It speaks about aggregates and yet appears to exclude consideration of sand and gravel. It is headlined as a minerals policy yet omits mention of High Specification Aggregates (HSA) and coal. Finally, national policy promotes secondary and recycled aggregates yet there is no strategic mention of the subject. It needs to be radically restructured in order to make plain what it is about and to cover in strategic policy terms all aspects of minerals planning in a coherent way.

For safeguarding, the policy should mention the need to safeguard all mineral resources based on those shown on the National Minerals and Aggregates Safeguarding Maps for Wales. In particular, the policy should

- a. Acknowledge that national policy refers to all minerals, not just to aggregates (MPPW para 13). The policy needs to be changed to make this clear.
- b. It would benefit users of the plan if the mpa listed the minerals of economic importance which it is intended to safeguard, as listed on the BGS National Safeguarding Maps.
- c. The policy could also usefully mention the strategic intention to identify mineral safeguarding areas since the means by which safeguarding is to be implemented is not mentioned.
- d. The policy could also usefully mention the need to safeguard strategic supplies of building stone

The policy also fails to mention the need to make local plan provision for the recycling of construction materials for aggregates, or the use of secondary aggregate materials.

The policy also makes no mention of the need to safeguard existing and proposed mineral transport, handling and processing facilities as required in national policy.

The policy also interprets the need to plan for the provision of steady and adequate supplies of aggregates in line with national policy in terms of a 'continuous supply' which are not the same thing. We suggest that the wording of national policy is used since this conveys the idea of a supply which is adequate for the construction industry. There should be a reference to the RTS2 targets for provision of aggregates in numerical terms, and the apportionment.

We suggest a replacement policy to take account of these points, (new text in bold; deletions in strikethrough)

"Minerals

SP14 The Council will maintain a steady and adequate supply of minerals by:

- i. Maintaining a minimum 10 year land bank of permitted crushed rock aggregate reserves throughout the plan period at an apportionment rate of 0.76 Million tonnes per annum (19.0 Mt 2011 to 2036);
- ii. Maintaining a steady and adequate supply of High Specification Aggregates (HSA),

iii. Supporting appropriate applications for sand and gravel extraction

The Council will also protect existing mineral reserves and safeguard potential resources from development that would preclude their future extraction. Accordingly, Mineral Safeguarding Areas (MSA) have been defined on the Proposals Map for Coal, for High Purity Limestone, for Sandstone, for High Specification Aggregates (HSA), and for Sand and Gravel resources as shown on the Aggregates Safeguarding Map of Wales (South East Wales). In addition, existing and potential mineral infrastructure sites such as rail depots, railheads and their associated transport links, coating plants, concrete plants, will be safeguarded against development that would prevent their use for mineral transport, handling and processing.

Priority will be given to the production and supply of recycled and secondary aggregates. Provision will be made for a network of permanent and long term temporary recycling facilities which will make a significant contribution to the production of recycled and secondary aggregates.

Suitable locations for permanent recycled and secondary aggregates facilities include:

- general industrial land
- waste transfer stations
- permanent waste management sites
- railheads

Suitable locations for temporary recycled and secondary aggregates facilities include:

- mineral sites
- major development areas (brownfield land)"

Council Analysis

Strategy policy SP14 is carried over from the adopted LDP (Policy SP 8) and that policy was found to be sound by the inspector following the examination in 2010.

The policy deals with two aspects of minerals; ensuring that there is an adequate and steady supply of aggregate minerals for the construction industry as required by national policy in MPPW and ensuring that resources of all minerals are protected against permanent development that may prejudice future generations' decisions on mineral working. The latter is also in line with national policy. Policy SP14 provides the basis for the countywide policies, which set out in more depth how safeguarding will be achieved and which establish criteria to consider applications within minerals safeguarding areas (MSA) against.

MSAs are identified on the proposals map for coal, sandstone, limestone and sand and gravel.

High specification aggregates are not identified separately in the annual surveys carried out by the South Wales Aggregates Working Party and the market tends to ensure that suitable material is used

for an appropriate end use through higher prices. Because of the lack of data, it would be difficult to monitor the amount of aggregate sold for HSA use (not all of the stone produced at the two HSA quarries in the county borough is used for specialist end use).

Sand and gravel has not been worked in the county borough since 1996 and the South Wales region, especially South East Wales, is currently uniquely dependant on marine dredged sand and gravel. The resource areas that have been identified in the county borough by BGS and earlier studies tend to be small and fragmented and there is no evidence to suggest that they are economically viable. Nevertheless, they will be protected in the Deposit Replacement LDP.

Building stone has been produced at quarries within the county borough. Any applications for further development will be considered against the policies in the LDP. It is not feasible to protect specific resources for building stone, although the Pennant Sandstone in the coalfield, which is already safeguarded, may offer opportunities for building stone quarries as well as HSA.

Rail loading and transport facilities for minerals are located at Cwmbargoed Disposal Point (Miller Argent) and Machen Quarry (Hanson). These are in private ownership and are currently in use in connection with mineral working sites that have a life until 2023 and 2042 respectively. However, the RTS 1st Review 2014 states that “existing and potential railheads should be identified for safeguarding in the LDP in order to provide a full range of sustainable transport options, whether or not they are currently utilised”. It is, therefore, considered that these sites should be safeguarded.

Proposals for recycling of materials to produce recycled and secondary aggregate will be considered against the policies in the plan. While the benefits of re-use and recycling are acknowledged and the council would encourage such proposals on suitable sites where environmentally acceptable, it is not considered necessary to specifically state that aim in the policy. Such a policy would also duplicate national policy in MPPW, paragraph 56, guidance in Technical Advice Note 1: Aggregates and regional guidance in the Regional Technical Statement (RTS).

The RTS was published in October 2008 when the LDP was at an advanced stage and the RTS first review was published in July 2015, after being endorsed by the constituent local planning authorities, including Caerphilly County Borough Council. The council, therefore, is obliged to take account of the provisions of the RTS 1st review and it is not necessary to refer to it in LDP policy. The RTS sets out an apportionment for each of the local planning authorities in the region. However, it would not be appropriate to refer to a specific figure in terms of tonnes per annum in the policy since production can fluctuate over the plan period.

SP14 is a strategic policy that is supported by countywide policies and area specific policies. Together the policies provide a framework within which to consider proposals for mineral development in the county borough. It was found to be sound at the examination in 2010 and there has been no change in circumstances since then, that suggests that a change is needed.

However, it is acknowledged that the heading “Mineral Safeguarding” is misleading since the policy deals also with the landbank of permitted reserves. The reasoned justification also deals only with safeguarding and could be expanded to give more background on the supply and landbank issue.

Proposed action:

1. Change the heading of policy SP14 to read “Minerals”.
2. Consider revising the reasoned justification to explain the landbank, for example:-

“National policy in MPPW and TAN1: Aggregates requires that local planning authorities plan to maintain an adequate supply of aggregate minerals (MPPW paragraph 67), while having regard to the need to manage supply in a sustainable way to strike the best balance between environmental, economic and social considerations. The Regional Technical Statement First Review 2014 provides a strategy for the future supply of construction aggregates in south Wales.

Each local planning authority is required to make future provision for land won primary aggregates in its LDP on the basis of an annualised apportionment. In the case of Caerphilly county borough council, the annualised apportionment is nil for sand and gravel and 0.76 million tonnes a year for crushed rock. In 2010 the landbank for the county borough was 27.8Mt which was adequate for 36.57 years. Adjusting the figures for 2015 would give a landbank of 31.5 years or 24 Mt. Therefore, a ten year landbank can be maintained throughout the plan period.”

3. Include a policy safeguarding the rail loading and handling facilities at Machen Quarry and at Cwmbargoed.

Safeguarding Freight Railheads

TR3 The following railheads will be protected to ensure a full range of sustainable freight transport options is maintained:

TR3.1 Cwmbargoed Rail Head

TR3.2 Machen Quarry Rail Head

The South Wales Regional Aggregates Working Parties (SWRAWP) approved the first review of its Regional Technical Statement (RTS) in 2014. The RTS provides detail in respect of the policy framework set out in MTAN1, and sets the requirements for aggregates and provides guidance in respect of LDP Policy. The RTS 1st Review identifies that existing and former mineral rail heads should be protected to ensure that options for the sustainable transport of minerals is maintained.

There are two rail heads located within the county borough, one serving the Ffos-y-Fran opencast scheme in the adjoining local authority of Merthyr Tydfil County Borough Council, and Machen Quarry. Both of these rail heads will be protected for transport use, particularly for mineral freight transport, during the plan period.

Recommendation

The comments be noted and the Deposit Replacement LDP and associated Background Paper be worded to reflect the current position

5305.P1 MS. MAGGIE. THOMAS

Representation

LDP Vision (Question 1)

The Representor disagrees with the vision, that there will be a wide range and diversity of sites that will deliver high quality and appropriately located homes. Much of the land mentioned for residential development is on greenfield sites with, in many cases public rights of way (PROW) crossing the land. The strategic site in the MVC is criss-crossed with public footpaths. CCBC does not have a good reputation for ensuring that the public's rights are protected when developers wish to maximise profit.

Council Analysis

The strategic vision for the County Borough has been developed in partnership with the Local Service Board and other partners. The representor does not disagree with the vision per se, rather the representor disagrees that the plan will be able to deliver a range and diversity of sites for housing. The Preferred Strategy consultation stage does not show all housing allocations, these along with all other land use allocations will be consulted on at the Deposit Stage. Inevitably, some allocations contained within the Deposit Replacement LDP will be crossed by a public right of way, where this is the case the Council will look to maintain the PROW or alternatively make provision for a suitable diversion.

Recommendation

No amendment be made in respect of this representation

5305.P2 MS. MAGGIE. THOMAS

Representation

Paragraph 4.2

Whilst CCBC intends to find a good balance between social, environmental and economic objectives, concern is expressed that the economic objective will prevail, otherwise there would be a greater commitment to developing brownfield land in preference. Approximately 60% of the candidate sites meeting the Preferred Strategy are greenfield sites.

Council Analysis

The Council in developing the Preferred Strategy, identified and tested a number of different spatial options. In considering the spatial options, the Council examined the elements of the spatial options and selected the best elements from a number of spatial options in order to develop the Preferred Strategy. An integral part of this strategy is an emphasis on the development of sustainable and appropriate roles for each settlement that will provide the context for managing the scale and type of development that will be permitted in different locations.

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one within the mid valleys corridor along the A472 strategic highway corridor at Maesycwmmmer and the other within the southern connections corridor resulting in a south-east expansion to Caerphilly Town Centre. The Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Whilst it is recognised that greenfield land will need to be released for development in addition to brownfield land, the proposed sites for allocation are those that will have the least impact on the environment, preserving environmentally sensitive areas. The Council will continue to allocate brownfield land where available, however due to 2 successive and successful brownfield strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5305.P3 MS. MAGGIE. THOMAS

Representation

LDP Aims (Question 2)

The aims are considered to be appropriate, however concern is expressed that so many of the sites that meet the Preferred Strategy are greenfield sites, many of them crossed by public rights of way. It is difficult to understand how promoting sustainable agriculture is being implemented when so many greenfield sites could be developed for housing.

Council Analysis

The representor's support for the aims is welcomed. The candidate sites register indicates the sites that are in accordance with the Preferred Strategy, the fact that sites are in accordance with the

strategy does not mean that the sites will be taken forward as allocations within the plan. Candidate sites are those sites submitted by members of the public and landowners for consideration for inclusion in the plan. Each site has been subject to a robust assessment to determine its suitability or otherwise for development.

Recommendation

The comments be noted

5305.P4 MS. MAGGIE. THOMAS

Representation

The Rio Declaration is not being adhered to by planning development on so many greenfield sites and threatening the health of residents by extinguishing so many footpaths.

Council Analysis

The Council is fully compliant with legislation and guidance, the emerging plan and its allocations will be subject to Strategic Environmental Assessment, Sustainability Appraisal and a Habitats Regulations Assessment (HRA) in accordance with the EC Habitats Directive (92/43/EEC).

Recommendation

No amendment be made in respect of this representation

5305.P5 MS. MAGGIE. THOMAS

Representation

Objectives (Question 3)

Ensure that the County Borough is well served by accessible public open space and accessible natural green space (Objectives A, C, E, I & H) seem at odds with and contrary to proposing development on so many greenfield sites in the County Borough.

Ensure that the environmental impact of all new development is minimised (Objectives A, B C and J), this objective should ensure that public rights of way are considered as part of any development. Public rights of way should not be unacceptably diverted.

Encourage the re-use and / or reclamation of appropriate brownfield and contaminated land and prevent the incidence of further contamination and dereliction.

Ensure that all new development is well designed and has regard for its surroundings in order to reduce the opportunity for crime to occur, this objective should be extended to the consideration of the design of PROW.

Identify, protect and where appropriate enhance valuable landscapes and landscape features and protect them from unacceptable development (objectives A, D & J). The representor is generally in support of this objective but believes that 'valuable landscapes and landscape features' are present throughout the county borough and expresses concern that this terminology will encourage people to take a narrow view, with emphasis being placed on some of the more prominent landscapes within the borough, Cwmcarn Forest, Caerphilly Castle etc.

Council Analysis

The representor's concern in relation to the objectives are that the release of greenfield land is at odds with ensuring that the county borough is well served by accessible public open space and accessible natural green space, and that the terminology 'valuable landscape and landscape features' requires further qualification.

The release of greenfield land is not at odds with objective A, as by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

Key objective 11 states that in order to achieve the strategy the plan will

"Identify, protect and, where appropriate enhance, valuable landscape features and protect them from unacceptable development."

The landscape of the county borough is valued for its intrinsic value throughout the County Borough. Moreover, qualifying areas are proposed to be identified as either Special Landscape Areas or Visually Important Local Landscapes in the Deposit Replacement LDP in order to afford these areas additional protection from inappropriate development.

The representor is concerned about the impact development could have on allocated land crossed by a public right of way. Inevitably, some allocations within the Deposit Replacement LDP will be crossed by a public right of way, where this is the case the Council will look to maintain the PROW in the first instance or make provision for a suitable diversion.

Recommendation

No amendment be made in respect of this representation

5305.P6 MS. MAGGIE. THOMAS

Representation

Level of growth (Question 4)

The plan makes provision for 12,400 new dwellings, which equates to 620 per annum. These figures seem reasonable. Whilst the level of growth seems appropriate, concern is expressed with regard to the release of greenfield sites in the south of the borough, the resresenter considers that more brownfield sites should be found for development.

Council Analysis

The support for the level of growth proposed is welcomed. Whilst the resresenter expresses concern regarding the release of greenfield land in the south of the county borough, the Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Brownfield land where available, however due to 2 successive and successful brownfield strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

The comments be noted

5305.P7 MS. MAGGIE. THOMAS

Representation

Strategy Areas (Question 6)

The resresenter does not consider that the three strategy areas are appropriate and that they reflect the role and function of the settlements in those areas.

The representor considers that the one of the underlying reasons for selecting this particular strategy is to supply and satisfy the need for housing to accommodate the workforce of Newport and Cardiff, resulting in the loss of greenfield sites within the MVC and SCC, to the detriment of the environment. The representor also objects to the lack of housing within the HOVRA, reducing the scale and number of sites in this area is suggesting that the HOVRA is less worthy than the rest of the borough. Each strategy area should have its share of housing and brownfield sites should be used as much as possible.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality. Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid.

The SCC strategy area does not seek to satisfy the need for housing to accommodate the workforce of Newport and Cardiff, rather it seeks to provide a choice and range of housing for residents within the SCC, whilst acknowledging the influence of Cardiff and Newport as major employment centres. The strategy seeks to improve public transport infrastructure to facilitate commuting to these destinations. The strategy does not suggest that the HOVRA is less worthy than the rest of the county borough, the HOVRA will still contain housing allocations in order to provide for a range and choice of housing, however the scale and number of new housing allocations has been reduced to more closely align with market activities and market demand. Each strategy area contains a mix of both greenfield and brownfield sites.

Recommendation

No amendment be made in respect of this representation

5305.P8 MS. MAGGIE. THOMAS

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor.

The phrase 'some greenfield release' is considered to be disingenuous as the plans are to utilise a massive amount of greenfield land. The alternatives are to plan housing development across the whole of the county borough equally.

Council Analysis

The representor expresses concern regarding the release of greenfield land in the south of the county borough and mid valleys corridor, the Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Greenfield land will need to be released for development in addition to brownfield land, however the sites that are proposed are those that are deemed to have the least impact on the environment. Brownfield land will continue to be allocated where available, however due to 2 successive and successful brownfield strategies, much of the brownfield land within the SCC and MVC has been developed.

The representor considers that housing allocations should be shared equally amongst each strategy area within the county borough. To suggest that the housing allocations can be shared out equally across the three strategy areas is unrealistic, as the three strategy areas are significantly different in terms of their: topography, physical and environmental constraints, connectivity to the public transport network, and their attractiveness to investors which impacts on viability and deliverability. Further housing needs to be targeted to those areas where there is a demand for housing and where there is an acute need as demonstrated by the Local Housing Market Assessment.

Whilst it is desirable to encourage development further north and specifically in the Heads of the Valleys, allocations within the Deposit Replacement LDP are required to meet a housing need and be realistic and deliverable within the plan period. Many allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to issues of lack of demand within this area which in turn impacts negatively on viability. The preferred strategy recognises this and therefore seeks to reduce the scale and number of new housing allocations within the HOVRA, to more closely align with market realities (activity and demand).

Recommendation

No amendment be made in respect of this representation

5305.P9 MS. MAGGIE. THOMAS

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site within the mid valleys corridor. The strategic site to accommodate 1700 houses on farmland in Maesycwmmmer would disproportionately enlarge the settlement of Maesycwmmmer and the site is crossed by a number of public rights of way that are used by local walkers. Brownfield opportunities should be explored.

Council Analysis

The Council in developing the Preferred Strategy, identified and tested a number of different spatial options. An integral part of this strategy is an emphasis on the development of sustainable and appropriate roles for each settlement that will provide the context for managing the scale and type of development that will be permitted in different locations.

The scale of the proposals to be targeted at each of the strategy areas is based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one of these being within the mid valleys corridor along the A472 strategic highway corridor at Maesycwmmmer

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Brownfield land will continue to be allocated where available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

The allocation of the strategic site at Maesycwmmmer will significantly enlarge the settlement of Maesycwmmmer. However a well-planned, sustainable extension to Maesycwmmmer would provide the opportunity to create a high-quality inclusive environment. By adopting the masterplanning approach to the proposed expansion of the area, a better quality of life would be achieved for those residents that choose to live in the area. This approach would facilitate the highest sustainability standards, economies of scale, and the better use of new and existing infrastructure. It would also allow for the provision of a network of public rights of way across the site.

Recommendation

No amendment be made in respect of this representation

5305.P10 MS. MAGGIE. THOMAS

Representation

Concerns are raised in respect of recent applications to delete, extinguish and divert rights of way. A number of sites that meet the preferred strategy are crossed by public rights of way. Examples of these include MAE004, STC003, BLA003 & RSE001.

Council Analysis

The representor is concerned about the impact development could have on public rights of way. Inevitably, some allocations contained within the Deposit Replacement LDP will be crossed by a public right of way, where this is the case the Council will look to maintain a PROW in the first instance or make provision for a suitable diversion.

Recommendation

No amendment be made in respect of this representation

5316.P1 MR. DEREK. GRATTAGE

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5316.P2 MR. DEREK. GRATTAGE

Representation

LDP Aims (Question 2)

The representor supports the aims

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5316.P3 MR. DEREK. GRATTAGE

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5316.P4 MR. DEREK. GRATTAGE

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

5316.P5 MR. DEREK. GRATTAGE

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5316.P6 MR. DEREK. GRATTAGE

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas

Council Analysis

The support for the three strategy areas identified in the Preferred Strategy and the fact that they are considered to reflect the role and function of the settlements within them is welcomed.

Recommendation

The support be noted

5316.P7 MR. DEREK. GRATTAGE

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor considers that all greenfield sites should have been subject to public discussion prior to the identification of strategic sites in the preferred strategy, allowing dissenters more time to consider the proposals.

Council Analysis

The preparation of the Replacement Local Development Plan is governed by a strict timetable as set out by the Delivery Agreement. The Delivery Agreement has been produced in accordance with the Local Development Plan Manual 2006 and The Town and Country Planning (Local Development Plan)(Wales) Regulations 2005 as amended by Amendment Regulations 2015. The Delivery Agreement sets out the timetable for plan preparation including key stages of consultation and the mechanisms by which people can become engaged in the process. The Council have adhered to the Delivery Agreement as approved by Welsh Government.

The consultation on the preferred strategy is the mechanism by which the public can make their views known in respect of the general direction of emerging policy and areas of significant growth. The Deposit Stage is the statutory six-week public consultation in respect of the complete plan together with its site specific allocations. This stage of plan preparation is scheduled to take place in February and March 2016 and therefore residents will have an opportunity to comment fully on the proposal at that time.

Recommendation

The comments be noted in respect of this representation

5316.P8 MR. DEREK. GRATTAGE

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for strategic sites as it is considered that no thought has been given to the adverse affects on the existing population that the increased population is likely to generate, particularly transport links by road and rail.

Council Analysis

The proposed new development will be required to be high quality, locally distinctive, sustainable, well integrated and make a positive contribution to the host settlement of Maesycwmmmer. It will have excellent connectivity and will be required to make provision for a small neighbourhood centre, which should support a new primary school and neighbourhood store and subject to agreement with the Health Board a new GP surgery could also be located here. The development should have a planned network of new green infrastructure, which will meet the amenity and leisure needs of local residents and also provide the green links both within the site itself and to the village and the wider countryside.

Development of the site is required to be guided by a detailed masterplan which it is suggested will be prepared in parallel with the Deposit Consultation exercise, and this will inform part of any subsequent planning application for the site. The masterplan will clearly set out the vision and objectives for the site, together with a phasing plan to deliver the road in its entirety at the earliest opportunity. The masterplan will have full regard to the context of the site and the local, natural, historic and built environment and its special features.

Critical to its success will be the development of a dedicated new road linking the A472 Crown Roundabout at Maesycwmmmer to the A469 Dyffryn Roundabout at Ystrad Mynach. This new road will not only provide the access necessary for Parc Gwernau, but will also serve to alleviate congestion along the existing A472.

The integration and connectivity of the site not only to Maesycwmmmer but also to the wider Mid Valleys Corridor area will be critical. The design and layout of the site will therefore be required to ensure that excellent provision is made for pedestrian and cycle access and that there is adequate connectivity to Maesycwmmmer / Hengoed and Ystrad Mynach / Llanbradach to encourage sustainable modes of travel and minimise car borne trips.

Recommendation

No amendment be made in respect of this representation

5316.P9 MR. DEREK. GRATTAGE

Representation

Protection of education and leisure areas is vital, particularly if the population expands

Council analysis

It is agreed that development should be accompanied and supported by necessary infrastructure including education and leisure provision.

Recommendation

The comments be noted

5316.P10 MR. DEREK. GRATTAGE

Representation

Transport links are inadequate and already overloaded, new road and rail links are required to facilitate any growth.

Council Analysis

Strategic transport improvements are required over the plan period up to 2031. Strategy Policies SP25 Transport Infrastructure Improvement, SP26 Safeguarding Former Rail Lines and SP27 Road Hierarchy provide the high level policy framework from which to base the Countywide and allocation policies within the Deposit Replacement LDP.

Recommendation

The comments be noted

5316.P11 MR. DEREK. GRATTAGE

Representation

Access to the Park & Ride facilities at Ystrad Mynach & Llanbradach are inadequate, they will cause severe disruption to residents. The facility in Llanbradach is almost inaccessible by road.

Council Analysis

The Council is committed to ensuring that sustainable transport solutions are available and deliverable within the plan period and are aware that any delay in providing sustainable travel options is likely to result in developments becoming car based. Sustainable transport solutions are required to ease congestion, alleviate air pollution and to accommodate new development. The Council considers that Park & Ride facilities at Ystrad Mynach & Llanbradach are necessary, the need for these facilities were identified in the Local Transport Plan 2010.

Recommendation

The comments be noted. No amendment be made in respect of this representation

433.P1 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

433.P2 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

LDP Aims (Question 2)

The representor supports the aims

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

433.P3 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

433.P4 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

433.P5 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

The support for the use of historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

433.P6 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas

Council Analysis

The support for the three strategy areas identified in the Preferred Strategy and the fact that they are considered to reflect the role and function of the settlements within them is welcomed.

Recommendation

The support be noted

433.P7 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor considers that more effort should be made to incentivise developers to build on brownfield sites and that brownfield areas should be made more attractive.

Council Analysis

Brownfield land will continue to be allocated where available and suitable, however due to 2 successive and successful brownfield strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land in addition. Whilst the Council is able to allocate brownfield land for development, it is not able to incentivise developers to develop it. The development of brownfield land is largely determined by viability, where developer profit is sufficient, the land will be brought forward for development.

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Whilst the Council acknowledge that greenfield land will need to be released for development in addition to brownfield land, the Council are seeking to allocate greenfield sites that will have the least impact on the environment.

Recommendation

The comments be noted and no amendment be made in respect of this representation

433.P8 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for strategic sites in the MVC & SCC as development should be encouraged further north where there is a need for housing and employment opportunities. The MVC & SCC are already overstretched.

Council Analysis

The representor considers that strategic sites should not be allocated within the MVC and SCC as development should be encouraged further north within the HOVRA. It would be desirable to encourage development further north, however allocations within the Deposit Replacement LDP are required to meet an identified need and there has to be a demand for that development in order for such allocations to be realistic and deliverable within the plan period.

Many allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to lack of demand within this area which in turn impacts negatively on viability. The preferred strategy recognises this and therefore seeks to reduce the scale and number of new housing allocations within the HOVRA, to more closely align with market realities (activity and demand).

Recommendation

The comments be noted and no amendment be made in respect of this representation

433.P9 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Draethen Waterloo & Rudry Community Council is concerned about the Preferred Strategy, expressing serious concerns regarding the capacity of roads in this area. They state that the existing infrastructure struggles to cope with the volume of traffic as it currently stands – any increase in housing will inevitably come with an increase in vehicles using the lanes in and around the Villages. The potential large increase in traffic volumes will require costly development of the road system.

Council Analysis

The Community Council's concern is noted, however the scale of proposals to be targeted to each strategy area will be based on the appraisal of the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate the necessary social or physical infrastructure.

Recommendation

The comments be noted and no amendment be made in respect of this representation

433.P10 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

Key issues that require further consideration (Question 10)

Draethen Waterloo & Rudry is a semi rural community, which will be encroached upon if the proposals should go ahead. Residents are extremely concerned about the change in nature to our community. We have none of the infrastructure necessary for an increase in housing and population. There are no shops, only a small school and no other facilities for the residents.

Council Analysis

The Community Council's concern is noted, however the scale of proposals to be targeted to each strategy area will be based on the appraisal of the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate the necessary social or physical infrastructure.

Recommendation

The comments be noted and no amendment be in respect of this representation

433.P11 DRAETHEN, WATERLOO & RUDRY COMMUNITY COUNCIL

Representation

The Representor considers that capitalising on tourism and protecting the Natural Heritage from development within the SCC is contrary to the level of development proposed for this strategy area.

Council Analysis

The level of development proposed for the SCC reflects the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints and the extent to which development can provide or compensate the necessary social or physical infrastructure. The development proposed does not undermine the objectives of capitalising on tourism nor the protection of the natural heritage. Indeed the strategy continues to promote the redevelopment of unsightly and underused brownfield sites in order to bring them back into beneficial use and improve the environment for both residents and visitors alike. Further a large proportion of the countryside within the SCC is to be afforded protection for its intrinsic value in the Deposit Replacement LDP. In this context the majority of the land around the existing settlements in the SCC is either proposed to be designated Special Landscape Areas, Visually Important Local Landscape Areas and/or where appropriate Sites of Importance for Nature Conservation.

Recommendation

The comments be noted and no amendment be made in respect of this representation

5131.P1 MR. JOHN. DAVIES

Representation

LDP Vision (Question 1)

The vision is not tackling the needs of Caerphilly County Borough as a whole and there are far greater concerns that need addressing.

Council Analysis

The strategic vision for the County Borough has been developed in partnership with the Local Service Board and other partners and is fit for purpose. The representor considers that there are 'greater concerns that need addressing' but does not clarify their concerns.

Recommendation

The comments be noted and no amendment be made in respect of this representation

5131.P2 MR. JOHN. DAVIES

Representation

LDP Aims (Question 2)

The representor is generally supportive of the aims

Council Analysis

Support for the aims is welcomed.

Recommendation

The support be noted

5131.P3 MR. JOHN. DAVIES

Representation

Level of growth (Question 4)

The representor disagrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

The representor considers that there is a lack of sufficient employment opportunities in the valleys and the focus should be on employment rather than housing as people require employment in order to purchase property. The lack of employment opportunities is driving people away from the valley.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial

options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. The Council maintains this position.

The representor argues that there should be a focus on employment opportunities as opposed to housing and that there is a lack of employment opportunities in the north of the county borough, essentially the HOVRA. It is important to note that housing development is widely recognised as having a major role to play in driving economic growth, as well as providing much needed homes. The house building industry requires a large number of workers with a variety of skills and includes: those working directly for house builders; their contractors; and those employed in their supply chains. Further the industry supports: indirect investment and employment in supply chain companies that provide construction materials and equipments related to house building; local businesses, as construction workers spend their wages in local shops and facilities. New house building also offers an opportunity to increase local expenditure as residents spend their money on goods and services within the local economy. The construction of new homes within the area therefore will provide a valuable source of employment for residents.

In terms of traditional employment opportunities, the Deposit Replacement LDP will make adequate provision for employment land throughout the county borough at a range of employment sites in order to ensure that investment in the area can take place. Furthermore in recognition of the importance of town centres and tourism for employment, the Deposit Replacement LDP will enhance employment opportunities through the allocation of appropriate land to promote commercial and tourism development including: Commercial Development Sites, Commercial Opportunity Areas and Tourism related development and activities.

Recommendation

No amendment be made in respect of this representation

5131.P4 MR. JOHN. DAVIES

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031, as it is important to keep the Borough community alive and encourage people to live within the borough.

Council Analysis

The Council welcomes support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Recommendation

The support be noted

5131.P5 MR. JOHN. DAVIES

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas. The representor believes that the strategy areas result in the loss of 'valley identity'.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality; specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid. The identification of the three strategy areas do not result in the loss of 'valley identity'.

Recommendation

No amendment be made in respect of this representation

5131.P6 MR. JOHN. DAVIES

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor agrees with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor, however would like greater transparency and open discussions via public meetings to discuss greenfield sites.

Council Analysis

The representor's support for the release of greenfield land is welcomed.

The preparation of the Replacement Local Development Plan is governed by a strict timetable as set out by the Delivery Agreement. The Delivery Agreement has been produced in accordance with the Local Development Plan Manual 2006 and The Town and Country Planning (Local Development Plan)(Wales) Regulations 2005 as amended by Amendment Regulations 2015. The Delivery Agreement sets out the timetable for plan preparation including key stages of consultation and the mechanisms by which people can become engaged in the process. The Council have adhered to the Delivery Agreement as approved by Welsh Government.

The consultation on the preferred strategy is the mechanism by which the public can make their views known in respect of the general direction of emerging policy and areas of significant growth and also on the principle of greenfield development. The Deposit Stage is the statutory six-week public consultation in respect of the complete plan together with its site specific allocations. This stage of plan preparation is scheduled to take place in February and March 2016 and therefore residents will have an opportunity to attend exhibitions and discuss any concerns with officers and to comment fully on the proposals at that time.

Recommendation

No amendment be made in respect of this representation

5131.P7 MR. JOHN. DAVIES

Representation

The representor expresses concern in respect of attracting new people to live and work within the county borough.

Council Analysis

The representor is concerned about attracting new people to live and work within the borough. It is necessary to recognise the need to retain and attract younger working age people in the county

borough in order to ensure the future economic prosperity of the area; and to help retain and sustain services and facilities. In determining the future population and household projection for the county borough, the Council considered a number of population and household growth scenarios. The Council determined that the moderate growth scenario was the most appropriate to underpin the preferred strategy. This scenario assumes a moderate Average Household Size Change and uses the SE Wales Migration (10 Yr Average) in its projection.

This scenario was considered the most desirable, realistic and robust option to inform the level of Population and Household Growth up to 2031, for the following reasons:

- The assumptions in respect of births and deaths are realistic having regard for both long and short-term trends;
- The migration rates that inform this options are realistic and achievable having regard for long-term trends;
- The Average Household Size reducing to 2.21 over the plan period is realistic when long term trends are take into account;
- The house building rates of 600 dwellings per annum are realistic having regard to the long-term trends in the county borough;
- The level of house building proposed is achievable over the plan period having regard for economic cycles within the plan period;
- This option recognises the need to retain and attract younger working age people in the county borough in order to ensure the future economic prosperity of the area; and
- This level of growth would help retain and sustain services and facilities. In particular, it will help sustain school provision over the plan period.

Recommendation

No amendment be made in respect of this representation

4803.P1 MRS. SAMANTHA. JONES

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose as it should focus on the needs of Caerphilly Borough residents rather than the Cardiff Capital Region.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and the Council considers that it is fit for purpose. At 'the heart of Cardiff Capital Region' is merely a locational reference as to where Caerphilly Borough lies within this region and does not imply that Caerphilly Borough is accommodating Cardiff's needs.

Recommendation

No amendment be made in respect of this representation

4803.P2 MRS. SAMANTHA. JONES

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate

Council Analysis

The representor's objection is noted, however the Council consider that the aims remain appropriate and have been developed in partnership with the Local Service Board and partner organisations.

Recommendation

No amendment be made in respect of this representation

4803.P3 MRS. SAMANTHA. JONES

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

Support for the objectives is welcomed

Recommendation

To note the support

4803.P3 MRS. SAMANTHA. JONES

Representation

Level of growth (Question 4)

The representor disagrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

The representor considers that the number of dwellings is too high as the build rate considerably exceeds the average rates over the last 10 years of 475 dwellings, and long term average of 519 dwellings. The representor believes that Scenario G should be used instead, based on 10 year average figures as they consider that the recession is not yet over and that we are unlikely to experience another housing boom.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge the validity of the work undertaken to date.

Recommendation

No amendment be made in respect of this representation

4803.P4 MRS. SAMANTHA. JONES

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031, as it is important to keep the Borough community alive and encourage people to live within the borough.

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

4803.P5 MRS. SAMANTHA. JONES

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality; specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The

strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid.

Recommendation

No amendment be made in respect of this representation

4803.P6 MRS. SAMANTHA. JONES

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor, instead it is suggested that further employment land is released for other uses and consideration should be given to further development in the north of the county borough where investment is needed.

Council Analysis

The representor disagrees with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor instead it is suggested that further employment land is released for other uses. The Council has reassessed all of the land allocated for employment in order to ascertain if it should be retained for employment use or released for alternative forms of development, including housing use. Where sites are no longer required for employment use they will be released for alternative use, conversely where they remain appropriate and suitable for employment use they will continue to be allocated for employment.

Whilst it would be desirable to encourage development further north where investment is needed, allocations within the Deposit Replacement LDP are required to be realistic and deliverable within the plan period. Many allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due a lack of demand for housing in this area which in turn impacts negatively on viability. For this reason the preferred strategy seeks to reduce the scale and number of new housing allocations within the HOVRA , to more closely align with market activity and demand.

Recommendation

No amendment be made in respect of this representation

4803.P7 MRS. SAMANTHA. JONES

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for strategic sites in the MVC & SCC as development should be encouraged further north where there is a need for additional housing and investment. The representor considers that the Council should decide where development takes place rather than being dictated to by developers.

Council Analysis

The representor considers that strategic sites should not be allocated within the MVC and SCC as development should be encouraged further north within the HOVRA. Whilst it would be highly desirable to encourage development further north, allocations within the Deposit Replacement LDP are required to be realistic and deliverable within the plan period. Many land use allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due a lack of demand within this area which impacts in turn on development viability.

With regard to the comment that the Council should decide where development takes place rather than being dictated to be developers, it must be stressed that the plan preparation process is an inclusive and iterative process that takes into account the views of all stakeholders. Stakeholders include: Residents; Business; Specific consultation bodies such as Welsh Government, Natural Resources Wales, utility and service providers, mobile phone operators and adjoining local authorities: Other General Consultation Bodies such as equalities groups, housing associations, wildlife groups, retailers, representative of the development industry, etc. Residents clearly have an important role to play in the future development of the county borough, however many other stakeholders equally have a valid interest in the future development of the area albeit from their own position/perspective. The Council ultimately has to balance all of the competing interests having regard to the evidence and develop a strategy that is credible, robust and deliverable to meet its stated aims and objectives over the plan period.

Recommendation

No amendment be made in respect of this representation

4803.P8 MRS. SAMANTHA. JONES

Representation

Strategic Site Southern Connections Corridor

There has been so much building in the SCC that further large housing developments in this area are insupportable as they put too much pressure on existing services and provision (health, education, transport network and leisure facilities).

Council Analysis

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure.

Recommendation

No amendment be made in respect of this representation

5205.P1 MR. JAMES. DAVIES

Representation

The representor objects to any settlement boundary change within the SCC (specifically the Rudry and Caerphilly area) that would result in the loss of greenfield land and constitute encroachment into the open countryside. The countryside should be protected for its natural beauty, flora and fauna and any development would have a negative impact. Development would put additional pressure on existing services and amenities.

Council Analysis

A settlement boundary review has been undertaken as part of the preparation of the Deposit Replacement LDP and amendments to the boundary have been made to reflect the development strategy that underpins the plan.

Whilst the representor expresses concern regarding the release of greenfield land in the south of the county borough, the Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough which will help to reduce pressure on other environmentally sensitive areas.

Recommendation

No amendment be made in respect of this representation

5088.P1 MR. KEITH. MASSON

Representation

Strategy Policy 13 – Renewable Energy: Local Areas of Search

The Manmoel Area is identified by Land Map as being of high and rare value in the visual and sensory category. Within the SEA/SA of the LDP review Scoping Report (CH18) it is acknowledged that as a result of this rating the area is of international/national importance.

As a result of this, I believe that the Manmoel Area should be precluded from consideration as a Local Area of Search and remain as a Special Landscape Area.

Council Analysis

It is anticipated that Manmoel will remain within a designated Special Landscape Area. The Council will produce Supplementary Planning Guidance to support the Deposit Replacement LDP in respect of renewable energy.

Recommendation

No amendment be made in respect of this representation

5087.P1 MR. DAVID. PUGH

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose.

Recommendation

No amendment be in respect of this representation

5087.P2 MR. DAVID. PUGH

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate

Council Analysis

The LDP aims have been developed in partnership with the Local Service Board and partner organisations and they are considered to be fit for purpose.

Recommendation

No amendment be made in respect of this representation

5087.P3 MR. DAVID. PUGH

Representation

Objectives (Question 3)

The representor does not consider that the objectives are appropriate

Council Analysis

The LDP objectives have been developed in partnership with the Local Service Board and partner organisations and they are considered to be fit for purpose.

Recommendation

No amendment be made in respect of this representation

5087.P4 MR. DAVID. PUGH

Representation

Level of growth (Question 4)

The representor disagrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position.

Recommendation

No amendment be made to the Preferred Strategy in respect of this representation

5087.P5 MR. DAVID. PUGH

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor strongly objects to the release of greenfield land within the SCC and believes that the Council should be looking at brownfield sites

Council Analysis

Targeting development to a limited number of growth corridors will prevent the proliferation of larger developments in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Brownfield sites will continue to be allocated where they are suitable and available for development.

Recommendation

No amendment be made in respect of this representation

5087.P6 MR. DAVID. PUGH

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site within the SCC. The strategic site proposed for the SCC is crossed by a public right of way and is used for recreational purposes, the development of this site would diminish the countryside and would detract from the scenic view of Caerphilly Town.

Council Analysis

The Representor objects to the inclusion of the strategic site proposed for the SCC due to its potential negative environmental impact. Each strategic site has been subject to a robust assessment to determine its suitability or otherwise for development. Where ecological or landscape issues have been identified, the Council will require the developer to suitably mitigate against any negative effect of development through measures such as design, the integration of biodiversity etc. Supplementary Planning Guidance will be produced for each strategic site that will be subject to public consultation in due course and will address issues such as public rights of way. The strategic site within the SCC is allocated for mixed use, including housing, employment and leisure.

Recommendation

No amendment be made in respect of this representation

2604.P1 NATIONAL GRID

Representation

Waterloo Works, Machen

National Grid notes that one of the sites identified for mixed use development located within the Southern Connections Corridor is crossed by / in close proximity to National Grid's high voltage overhead 4YX line.

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how

to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

Council Analysis

The comments from the National Grid in respect of the Waterloo Works are noted.

Recommendation

The comments be noted

2604.P2 NATIONAL GRID

Representation

Bedwas Colliery, Bedwas

National Grid notes that one of the sites identified for mixed use development located within the Southern Connections Corridor is crossed by / in close proximity to National Grid's high voltage overhead 4YX line.

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. Because of the scale, bulk and cost of the transmission equipment required to operate at 400kV National Grid only supports proposals for the relocation of existing high voltage overhead lines where such proposals directly facilitate a major development or infrastructure project of national importance which has been identified as such by central government. Therefore NG advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground

levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

Council Analysis

The comments from the National Grid in respect of Bedwas Colliery, Bedwas are noted.

Recommendation

The comments be noted

4557.P1 MR. SIMON. LEES

Representation

Strategy Policy 25 –Transport Infrastructure Improvement

The representor has no objection to development providing that transport infrastructure keeps pace of development and that existing transport infrastructure problems are not exacerbated due to volumes of traffic (namely highways leading to A470 and M4).

Council Analysis

The Preferred Strategy sets out three Strategic Highway Network Proposals as part of the overall Development Strategy, namely:

- 1 A469 Resilience Route
- 2 Maesycwmmmer Bypass
- 3 Caerphilly South Eastern Bypass – Phase 1

In identifying these proposals it is not the intention to increase highway capacity, individually or cumulatively. The A469 Resilience Route is a Welsh Government supported proposal that is a response to the catastrophic 8-week closure of the A469 in February 2014 due to a large land slip, which isolated the communities north of Troedrhifwuch from the remainder of the county borough. Due to the nature and topography of the land it is inevitable that the road would be subject to further slippage and potential closures. As a result this proposal is intended to maintain accessibility for the northern communities rather than provide increased capacity.

The Maesycwmmmer Bypass is a response to the long-standing problem of the pinch point in the main strategic east-west highway connection in the mid valleys at Maesycwmmmer. The Bypass is proposed as the most appropriate solution to the issue, redirecting traffic that goes south down the A469 from the east west traffic along the A472, reducing traffic through Maesycwmmmer, so alleviating the problem.

Similarly the full Caerphilly South East Bypass will complete the ring road around Caerphilly, with the intention of providing alternative routes to the A470 via Nantgarw and to Newport via Bedwas Road. The Caerphilly Air Quality Management Area was designated in 2010, due to air quality falling below required standards. In order to address the air quality issue the Caerphilly Air Quality Action Plan was produced and this identifies the Bypass as one of a suite of measures required to alleviate the air quality issues in the town centre.

All three proposals are being proposed as measures to overcome specific, existing issues and make more effective use of the highway network rather than being allocated purely to accommodate future traffic growth.

The Highway Improvements are part of a package of measures designed to improve the overall transport network, a series of proposals that seeks to enhance the rail network are also proposed to be included in the plan, together with measure to encourage walking and cycling.

Recommendation

The comments be noted

4557.P1 MR. SIMON. LEES

Representation

The representor objects to the release of employment land for alternative uses, namely housing, as we should be encouraging employment opportunities within the borough and reducing the need to travel to work by car by providing jobs locally.

Council Analysis

The Council commissioned research undertaken by BE Group to inform the employment evidence base for the Replacement Deposit LDP. This report assesses the supply, need and demand for employment land and premises (Use Class B) in Caerphilly County Borough and provides robust evidence to underpin and inform the Replacement Deposit Plan. It also provides an analysis of existing employment land and premises demand, supply and need up to 2031.

In terms of traditional employment opportunities, the Deposit Replacement LDP will make adequate provision for employment land throughout the county borough at a range of employment sites in order to ensure that investment in the areas future prosperity can take place. Furthermore in recognition of the importance of town centres and tourism for employment, the Deposit Replacement LDP will enhance employment opportunities through the allocation of appropriate land to promote commercial and tourism development including: Commercial Development Sites, Commercial Opportunity Areas and Tourism related development and activities.

Recommendation

No amendment be made in respect of this representation

5024.P1 MS. EMMA. BEVAN

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5024.P2 MS. EMMA. BEVAN

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5024.P3 MS. EMMA. BEVAN

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5024.P4 MS. EMMA. BEVAN

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031

Council Analysis

The representor's support for the use of the historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5024.P5 MS. EMMA. BEVAN

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The representor's support for the three strategy areas identified in the preferred strategy and agrees that they reflect the role and function of settlements in those areas is welcomed.

Recommendation

The support be noted

5024.P6 MS. EMMA. BEVAN

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor agrees with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor

Council Analysis

The representor's support for the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor is welcomed.

Recommendation

The support be noted

5024.P7 MS. EMMA. BEVAN

Representation

Strategic Sites (Question 8)

The representor agrees with the proposal for a strategic site in the MVC & SCC

Council Analysis

The representor's support for a strategic site in the MVC and SCC is welcomed.

Recommendation

The support be noted

5024.P8 MS. EMMA. BEVAN

Representation

Development within the SCC

The representor is concerned regarding the number and scale of candidate sites submitted in close proximity to Rudry and Waterloo. If all of these sites were deemed acceptable for development,

they would seriously undermine the nature of the two villages and stretch the infrastructure, which is contrary to key aims and objectives A, B and F. Whilst development is inevitable, only one significant site should be considered for each village rather than the 3 in each current suggested. This would enable the current infrastructure to support such development.

Council Analysis

The representor is concerned regarding the number of candidate sites submitted in close proximity to Rudry and Waterloo. Whilst a number of sites have been submitted in this area, each site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site/s are likely to generate, including the impact that such development is likely to have on existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5030.P1 MR. GERALD. PROCTOR

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. The representor believes that existing infrastructure is already overloaded and that land should not be allocated for additional housing.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is considered to be fit for purpose. The representor is opposed to any development on the basis that existing infrastructure is already overloaded. The evidence underpinning the plan demonstrates that new development can be accommodated in tandem with appropriate improvements to the existing infrastructure and serve to sustain existing services and facilities.

Recommendation

No amendment be made in respect of this representation

5030.P2 MR. GERALD. PROCTOR

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate

Council Analysis

The LDP aims have been developed in partnership with the Local Service Board and partner organisations and they remain appropriate.

Recommendation

No amendment be made in respect of this representation

5030.P3 MR. GERALD. PROCTOR

Representation

Objectives (Question 3)

The representor considers that the objectives are not appropriate

Council Analysis

The LDP objectives have been developed in partnership with the Local Service Board and partner organisations they remain appropriate.

Recommendation

No amendment be made in respect of this representation

5030.P4 MR. GERALD. PROCTOR

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5030.P5 MR. GERALD. PROCTOR

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor

Council Analysis

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. The Council is seeking to allocate greenfield land that will have the least impact on the environment, thus preserving environmentally sensitive areas.

Recommendation

No amendment be made in respect of this representation

5030.P6 MR. GERALD. PROCTOR

Representation

The representor objects to the candidate site proposed for housing, Land North of Hendredenny Drive, Caerphilly.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration has been given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have on existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

3532.P1 MR. TIM. JORDAN

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

3532.P2 MR. TIM. JORDAN

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

3532.P3 MR. TIM. JORDAN

Representation

Objectives (Question 3)

The representor considers that the objectives are not appropriate as developing greenfield land is contrary to Objective 2 - Ensure that the County Borough is well served by accessible public open space and accessible natural green space & Objective 3 – Ensure the effective and efficient use of natural and built resources while preventing the unnecessary sterilisation of finite resources through inappropriate development.

Council Analysis

The representor considers that the development of greenfield land is contrary to a number of objectives. The allocation of greenfield land for new development will include the provision of well located open space and recreation facilities to serve the sites is question as appropriate. These facilities will also benefit the wider and potentially bring leisure facilities closer to areas that are currently under-provided for. Further, whilst the development of greenfield sites will inevitably

result in the loss of those areas to development, it does not follow that it is not an efficient or effective use of land. The provision of much needed homes including affordable homes is fundamental to the sustainable development of the area.

Recommendation

No amendment be made in respect of this representation

3532.P4 MR. TIM. JORDAN

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

3532.P5 MR. TIM. JORDAN

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031

Council Analysis

The representor's support for the use of the historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

3532.P6 MR. TIM. JORDAN

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The support for the three strategy areas identified in the Preferred Strategy and the fact that they are considered to reflect the role and function of the settlements within them is welcomed.

Recommendation

The support be noted

3532.P7 MR. TIM. JORDAN

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor. Instead, brownfield sites that have been identified should be developed before any greenfield sites are released.

Council Analysis

Brownfield land will continue to be allocated where it is suitable and available, however due to 2 successive and successful plan strategies that targeted development to brownfield sites, very few brownfield sites remain available, necessitating the release for greenfield land. It is acknowledged that greenfield sites are likely to be developed in advance of brownfield sites due to the costs associated with remediating brownfield sites. However there are often significant costs associated with opening up greenfield sites as quiet often the essential infrastructure for such sites is not readily available and the developer is required to fund its provision.

Recommendation

No amendment be made in respect of this representation

3532.P8 MR. TIM. JORDAN

Representation

Strategic Sites (Question 8)

The representor agrees with the proposal for a strategic site in the MVC & SCC

Council Analysis

The representor's support for a strategic site in the MVC and SCC is welcomed.

Recommendation

The support be noted

5056.P1 MR. TERRY. WILLIAMS

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5056.P2 MR. TERRY. WILLIAMS

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5056.P3 MR. TERRY. WILLIAMS

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5056.P4 MR. TERRY. WILLIAMS

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

5056.P5 MR. TERRY. WILLIAMS

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5056.P6 MR. TERRY. WILLIAMS

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The representor's support for the three strategy areas identified in the preferred strategy and agrees that they reflect the role and function of settlements in those areas is welcomed.

Recommendation

The support be noted

5056.P7 MR. TERRY. WILLIAMS

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor. Instead, priority should be given to developing brownfield sites within existing settlement boundaries, for instance Virginia Park Golf Club.

Council Analysis

Brownfield land will continue to be allocated where it is suitable and available for development. However due to 2 successive and successful plan strategies that targeted development to brownfield sites in the SCC, very few brownfield sites remain available, necessitating the release for greenfield land.

Virginia Park Golf Club has been submitted for consideration through the Candidate Site process, however there is considerable uncertainty regarding the suitability of the land for residential development. The site is currently a functioning Leisure Centre, Golf Course and sports pitch area. The whole site (including pitches, driving range and golf course) has been suggested as a candidate site for housing. The supporting information that accompanied the candidate site submission indicated that if the site were to be identified for housing in the future then: the former Virginia Park Golf Club clubhouse will operate as a social club only; Caerphilly Leisure Centre would relocate to St Ilan; and Caerphilly RFC would be redeveloped and an enhanced facility provided. There is considerable uncertainty over the relocation of the Leisure Centre and it may be the case that a new centre will be redeveloped on the existing site; further the intentions of the Caerphilly RFC are unclear. Notwithstanding these matters the site was previously a former domestic refuse landfill site and a ground gas investigation is necessary to establish whether or not the site is suitable for residential development in the future. Where brownfield sites are to be relied on within the plan, there must be an element of certainty over their availability within the plan period and also on their viability and thus their delivery. It is unclear whether or not this site will indeed be available for development.

The plan does however make an allowance for windfall development as part of the housing land supply. Windfall development is development on a site that is not allocated for housing but is in any event developed out for housing. If the site becomes available and the ground investigation indicates the site can be developed the site could potentially contribute to the housing land supply as part of the windfall provision.

Recommendation

No amendment be made in respect of this representation

5056.P8 MR. TERRY. WILLIAMS

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the MVC & SCC

Council Analysis

The Council in developing the Preferred Strategy, identified and tested a number of different spatial options. In considering the spatial options, the Council examined the elements of the spatial options and selected the best elements in order to develop the Preferred Strategy. An integral part of this strategy is an emphasis on the development of sustainable and appropriate roles for each settlement that will provide the context for managing the scale and type of development that will be permitted in different locations.

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one of these being within the mid valleys corridor along the A472 strategic highway corridor at Maesycwmmmer.

Targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Whilst the Council acknowledge that greenfield land will need to be released for development in addition to brownfield land, the Council are seeking to allocate greenfield land that will have the least impact on the environment, preserving environmentally sensitive areas. The Council will still be allocating brownfield land where available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made to the Preferred Strategy in respect of this representation

5056.P9 MR. TERRY. WILLIAMS

Representation

Waterloo Works

The representor objects to Waterloo Works as a housing allocation on the basis that it is a large housing allocation in a semi rural area and sets a precedent for similar size developments in relatively small settlements.

Council Analysis

Waterloo Works is currently a site allocated in the adopted LDP. The sites allocated in the adopted LDP have been re-assessed and only those sites that are still genuinely available and realistically likely to be developed within the plan period will be carried forward into the Replacement Plan. Waterloo Works currently has planning permission for residential development for 545 units.

Recommendation

The comments be noted and no amendment be made in respect of this representation

5056.P10 MR. TERRY. WILLIAMS

Representation

BTM003 Land Southwest of Gelli Wastad Farm

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have on existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5056.P11 MR. TERRY. WILLIAMS

Representation

STJ003 Land at The Oaks, Rudry

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5056.P12 MR. TERRY. WILLIAMS

Representation

STJ004 Land West of Pentwyngwyn Road, Rudry

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5056.P13 MR. TERRY. WILLIAMS

Representation

STJ005 Land North of Waterloo Place, Machen

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5056.P14 MR. TERRY. WILLIAMS

Representation

STJ006 Land Northwest of Waterloo, Machen

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5056.P15 MR. TERRY. WILLIAMS

Representation

STJ008 Land at the Former Tin Works, Machen

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5056.P15 MR. TERRY. WILLIAMS

Representation

STJ009 Land at Gwern y Domen Farm, Caerphilly

The representor objects to the above candidate site on the basis that it could potentially generate significant traffic in the country lanes surrounding the development, resulting in congestion and posing a danger to walkers, horse riders and cyclists. The country lanes are already considered to be dangerous due to the volume and speed of traffic.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5169.P1 MRS. AMANDA. GREEN

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. The representor believes that the preferred strategy provides too much of a focus on the use of greenfield land as opposed to brownfield land. The representor proposes that brownfield sites Oakdale Comprehensive School & Pontllanfraith Comprehensive School should be allocated for housing.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose. The representor considers that there is too much focus on the release of greenfield land. The Council consider the release of greenfield land necessary as due to two successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed. The Council has assessed both Oakdale Comprehensive School and Pontllanfraith Comprehensive School as to determine their suitability for inclusion in the Deposit Replacement LDP and both sites are recommended to be proposed for housing development

Recommendation

No amendment be made in respect of this representation

5169.P2 MRS. AMANDA. GREEN

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate. The representor is opposed to the development of greenfield sites in the countryside.

Council Analysis

The aims have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose. The representor is opposed to the development of greenfield land, however the Council consider the release of greenfield land necessary as due to two successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5169.P3 MRS. AMANDA. GREEN

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5169.P4 MRS. AMANDA. GREEN

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

5169.P5 MRS. AMANDA. GREEN

Representation

Employment Land take up (Question 5)

The representor does not agree with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031. The representor believes that historic take up is not reflective of current needs as demonstrated by the reallocation circa of 8 acres at Oakdale Business Park for use as a school , the sterilisation of approximately 20 acres of land at Oakdale Business Park for the use of wind turbines and the redevelopment of land at Croespenmaen Industrial Estate for residential use.

Council Analysis

In determining the need for employment land, three alternative scenarios have been considered to inform the future need for employment land over the plan period. In addition to the preferred scenario (being the historic land take-up forecast), the Council also considered an Employment based forecast as well as a labour supply forecast, both of which are based on economic trends and predictions. The historic land take-up forecasts a greater need than both other scenarios, therefore sufficient land should be allocated to provide choice and flexibility.

Recommendation

No amendment be made in respect of this representation

5169.P6 MRS. AMANDA. GREEN

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The support for the three strategy areas identified in the Preferred Strategy and the fact that they are considered to reflect the role and function of the settlements within them is welcomed.

Recommendation

The support be noted

5169.P7 MRS. AMANDA. GREEN

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor.

Council Analysis

Targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Where greenfield land is released for development in addition to brownfield land, the Council is seeking to allocate greenfield sites that will have the least

impact on the environment, preserving environmentally sensitive areas. Brownfield land will continue to be allocated where it is suitable and available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5169.P8 MRS. AMANDA. GREEN

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the MVC & SCC

Council Analysis

The Representor objects to the inclusion of strategic sites due to their potential negative environmental impact. Each strategic site has been subject to a robust assessment to determine their suitability or otherwise for development. Where ecological or landscape issues have been identified, the developer will be required to suitably mitigate against any negative effect of through measures such as design, the integration of biodiversity etc. Supplementary Planning Guidance will be produced for each strategic site (Maesycwmmmer Expansion Framework & South East Caerphilly Expansion Framework) that will be subject to public consultation.

Recommendation

No amendment be made in respect of this representation

5169.P9 MRS. AMANDA. GREEN

Representation

CRU010 Land West of Ty-Mawr Farm Lane, Croespenmaen

The Representor objects to the above candidate site on the basis that it is outside the defined settlement boundary of Croespenmaen, is within an area of sandstone safeguarding, conflicts with the aim of 'protecting the countryside' and feels that enough development of greenfield land has taken place in recent years with the development of Brock Rise, Parc Bevan and Blacksmith's Close.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is mindful to allocate land in the Deposit Replacement LDP, due consideration will be given to the increased population and household numbers that the site is likely to generate, including the impact that such development is likely to have upon existing infrastructure and the need for additional infrastructure to support such development.

Recommendation

The comments be noted

5222.P1 MR. GARETH. MORGAN

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. The representor believes that for the purposes of the 21st century this plan is not environmentally sustainable and holds no real value for the county. The council are clearly struggling to meet the demands of the existing infrastructure; most roads are in a terrible condition, litter seems to be everywhere (off putting for visitors) and many essential services have been cut. There is an opportunity to do something really special in this area that will enhance the town rather than creating an urban sprawl that would eventually join up with Cardiff. Caerphilly needs its clearly defined boundary, it is a well known town with a clear heritage that incorporates the surrounding countryside. There are many more suitable areas for this type of development that have been overlooked; indeed existing housing sites desperately need upgrading and their general areas improved before the council embark on this proposal. I ask the council to improve it's existing resources first before looking to destroy this valuable ecosystem.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose.

The Council in developing the Preferred Strategy, identified and tested a number of different spatial options. In considering the spatial options, the Council examined the elements of the spatial options and selected the best elements in order to develop the Preferred Strategy. An integral part of this strategy is an emphasis on the development of sustainable and appropriate roles for each settlement that will provide the context for managing the scale and type of development that will be permitted in different locations.

The Council acknowledge that the sustainability appraisal found that the preferred strategy was not the most sustainable option. 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 another option 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, rather the findings of the assessment highlight considerations that the strategy might need to address.

The representor disagrees with the release of significant amounts of greenfield land for development and considers that it will have a detrimental impact for a number of reasons. Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Greenfield land will need to be released for development in addition to brownfield land, however the sites that are selected will be those that have the least impact on the environment. Brownfield land will continue to be allocated where where it remains suitable and available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5222.P2 MR. GARETH. MORGAN

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate as the representor would like to see improvements to the existing environment (existing housing, litter collections, road repair).

Council Analysis

The aims have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose. The representor does not agree that the aims remain appropriate as is opposed to the development of greenfield land, however the release of greenfield land is necessary as due to two successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5222.P3 MR. GARETH. MORGAN

Representation

Objectives (Question 3)

The representor considers that the objectives are not appropriate as they do not go far enough to acknowledge the environmental impact of the development of greenfield land.

Council Analysis

The LDP objectives have been developed in partnership with the Local Service Board and partner organisations and they remain appropriate.

Recommendation

No amendment be made in respect of this representation

5222.P4 MR. GARETH. MORGAN

Representation

Level of growth (Question 4)

The representor does not agree that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position..

Recommendation

No amendment be made to in respect of this representation

5222.P5 MR. GARETH. MORGAN

Representation

Employment Land take up (Question 5)

The representor does not agree with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

In determining the need for employment land, three alternative scenarios have been considered to inform the future need for employment land over the plan period. In addition to the preferred scenario (being the historic land take-up forecast), the Council also considered an Employment based forecast as well as a labour supply forecast, both of which are based on economic trends and predictions. The historic land take-up forecasts a greater need than both other scenarios, therefore sufficient land should be allocated to provide choice and flexibility.

Recommendation

No amendment be made in respect of this representation

5222.P6 MR. GARETH. MORGAN

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor and believes that development should be targeted to the north of the borough first in order to tackle problems such as longstanding deprivation, lack of employment opportunities etc

Council Analysis

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor. The representor considers that housing allocations should be targeted to the north of the county borough to tackle existing issues in that area in terms of deprivation. Whilst it is desirable to encourage development further north, allocations within the Deposit Replacement LDP are required to meet a proven need and demand and be realistic and deliverable within the plan period. Many allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to lack of demand within this area which in turn impacts on viability. The preferred strategy therefore reduces the scale and number of new housing allocations within the HOVRA, to more closely align with market activities and demand. Conversely there is an acute shortage of much needed homes within the MVC and the SCC and a demonstrable need within these areas as evidenced by the Local Housing Market Assessment.

Recommendation

No amendment be made in respect of this representation

5222.P7 MR. GARETH. MORGAN

Representation

The representor raises concerns in respect of infrastructure and the pressure that additional growth is likely to place on services and roads.

Council Analysis

Due consideration has been given to the increased population and household numbers that the strategic sites are likely to generate, including the impact that such development is likely to have on existing infrastructure and the need for additional infrastructure to support such development. Where new infrastructure is required this is identified within the plan.

Recommendation

The comments be noted

5291.P1 MR. SIMON. JONES

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. The representor believes that there is too much emphasis on the Cardiff Capital Region with lesser regard to the needs of Caerphilly.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and is fit for purpose.

The Strategy does not place an emphasis on the Cardiff Capital Region. The reference to ‘the heart of the Cardiff Capital Region’ is merely a locational reference in terms of where Caerphilly County Borough lies within this region.

Recommendation

No amendment be made in respect of this representation

5291.P2 MR. SIMON. JONES

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate, however feels that such large scale development of greenfield land is contrary to the aims A, D, E, G & L

Council Analysis

The representor considers that the development of greenfield land is contrary to aims A, D, E, G & I. Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Brownfield sites will continue to be allocated where they are suitable and available, however due to 2 successive and successful plan brownfield strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5291.P3 MR. SIMON. JONES

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

4975.P1 MR. ROBERT. HARRIS

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. The representor believes that the lower Islwyn area of the borough more closely aligns with Newport and not the Cardiff Capital Region. The representor would like greater reference made to Newport and believes that the links with Newport should be made more explicit.

Council Analysis

The Cardiff Capital Region is the term used to refer to the area that is comprised of the ten local authority areas of South East Wales. Reference within the vision to Caerphilly being at 'the heart of Cardiff Capital Region' is merely a locational reference in terms of where Caerphilly Borough lies within this region.

The Council recognises that lower Islwyn has close links with Newport and whilst it is not mentioned in the vision, it is mentioned numerous times throughout the strategy. It is important to note that Newport is also a part of the Cardiff Capital Region.

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose.

Recommendation

No amendment be made in respect of this representation

4975.P2 MR. ROBERT. HARRIS

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate as the representor would like to include an aim to raise the quality of housing sites.

Council Analysis

The aims have been developed in partnership with the Local Service Board and partner organisations and the Council considers that they are fit for purpose. Key Aim D states:

“D Facilitate the development of modern, well-designed, accessible, suitable and affordable housing that meets the needs of all sections of the community through the identification of appropriate land for housing in sustainable locations.”

It is also proposed to include the following key aim in the Deposit Replacement LDP:

“M Underpin all development with the principle of good design that meets a diversity of needs; integrates biodiversity; uses resources efficiently and which makes adequate provision for recycling and waste management.”

Further, Strategy policy SP9 Place making, addresses design and aims to raise the quality of development with ‘a high standard of design that reinforces attractive qualities of local distinctiveness’ and “design in accordance with best practice”

Recommendation

To note the proposed inclusion of Aim M in response to this representation

4975.P3 MR. ROBERT. HARRIS

Representation

Objectives (Question 3)

The representor considers that the objectives are not appropriate, as they do not make links to Newport and the East, neither do they make reference to satisfying the housing requirements of the population.

Council Analysis

The objectives have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose. The Preferred Strategy makes it clear that the county borough has close links with Newport and the east.

Satisfying the housing requirements of the population is addressed in Aim D as follows:

“D Facilitate the development of modern, well-designed, accessible, suitable and affordable housing that meets the needs of all sections of the community through the identification of appropriate land for housing in sustainable locations.”

Recommendation

No amendment be in respect of this representation

4975.P4 MR. ROBERT. HARRIS

Representation

Level of growth (Question 4)

The representor does not agree that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

The representor expresses concern that the concept maps accompanying the preferred strategy do not indicate all housing provision (only 5,500 homes), whereas the strategy indicates 12,400 homes.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough.

The concept maps are indicative, showing major areas of change only and the strategic sites. The Deposit Replacement LDP will contain the detail of the full range of land use allocations and these will be illustrated on the Proposals Map.

Recommendation

No amendment be made in respect of this representation

4975.P5 MR. ROBERT. HARRIS

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

4975.P6 MR. ROBERT. HARRIS

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan, which divided SE Wales into two spatial zones based upon their functionality. Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid.

Recommendation

No amendment be made to in respect of this representation

4975.P7 MR. ROBERT. HARRIS

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor agrees with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor

Council Analysis

The support for the release of greenfield land in both the Mid Valleys Corridor and the Southern Connections Corridor is welcomed.

Recommendation

The support be noted

4975.P8 MR. ROBERT. HARRIS

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the MVC & SCC

Council Analysis

The Council in developing the Preferred Strategy, identified and tested a number of different spatial options. In considering the spatial options, the Council examined the elements of the spatial options and selected the best elements from a number of spatial options in order to develop the Preferred Strategy. An integral part of this strategy is an emphasis on the development of sustainable and

appropriate roles for each settlement that will provide the context for managing the scale and type of development that will be permitted in different locations.

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one within the mid valleys corridor along the A472 strategic highway corridor at Maesycwmmmer, and one to the south east of Caerphilly.

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. In general greenfield land will need to be released for development in addition to brownfield land, however where greenfield sites are released they have been subject of a robust planning assessment in order to ensure that any environmental concerns can be addressed. Brownfield land will continue to be allocated where it is suitable and available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

4975.P9 MR. ROBERT. HARRIS

Representation

Scale & Choice of Housing Sites

The representor considers that there should be a range of housing sites, particularly smaller sites to provide for a greater choice of housing types.

Council Analysis

Agreed. In making provision for housing land it is good practice to allocate more land than the basic requirement to allow for choice and flexibility. The amount of over provision is not prescribed in national planning guidance, but it is best practice for local authorities to assume approximately 10% over-allocation. This approach has been followed by most South East Wales local authorities in the preparation of their development plans. The preferred strategy identified a 10% flexibility allowance with a housing provision of 13,640 new dwellings to deliver a housing requirement of 12,400 units. It is anticipated that the Deposit Replacement LDP will include a similar flexibility allowance. The

sites allocated for housing are those that are considered deliverable within the lifetime of the plan, having regard for constraints and viability. It should be noted that an assumption for small sites is included in the housing land supply. In this context small sites are those capable of accommodating up to ten units.

Recommendation

The comments be noted

5280.P1 MR. DEREK. BALL – RPS

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5280.P2 MR. DEREK. BALL – RPS

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5280.P3 MR. DEREK. BALL – RPS

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5280.P4 MR. DEREK. BALL – RPS

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

5280.P5 MR. DEREK. BALL – RPS

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

The representor’s support for the use of the historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5280.P6 MR. DEREK. BALL – RPS

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The the representor’s support for the three strategy areas identified in the preferred strategy and agrees that they reflect the role and function of settlements in those areas is welcomed.

Recommendation

The support be noted

5280.P7 MR. DEREK. BALL – RPS

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor agrees with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor

Council Analysis

The representor's support for the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor is welcomed.

Recommendation

The support be noted

280.P8 MR. DEREK. BALL – RPS

Representation

Gallagher Retail Park

The representor supports paragraph 7.43 that states that the future designation of Gallagher Retail Park will be considered through the review process. The representor fully supports the reconsideration and contends that such redesignation will be in the firm interests of the LPA in reducing the very significant outflow of retail expenditure to Cardiff in creating new employment opportunities within the County.

Council Analysis

The representor's support for Paragraph 7.43 that identifies the need to reconsider the designation of Gallagher Retail Park as part of the review process informing the Deposit Replacement LDP is welcomed.

Recommendation

The support be noted

5199.P1 MR. RAYMOND. DAVIES

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. It promotes access to the surrounding countryside and natural environment whilst the strategy promotes the release of greenfield land. The loss of greenfield land will result in a detrimental effect on wildlife habitat, the historic environment, unique communities, and recreational and tourist amenities. Brownfield sites should be promoted in the interests of sustainable development and we should reduce the ecological footprint of the borough.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose. The representor considers that the strategic vision is at odds with the strategy as the vision promotes access to the countryside and natural environment whilst the strategy advocates the allocation of greenfield land in the MVC & SCC.

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Whilst greenfield land will need to be released for development in addition to brownfield land, the Council will continue to allocate brownfield sites where they are suitable and available for development.

Recommendation

No amendment be made in respect of this representation

5199.P2 MR. RAYMOND. DAVIES

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate. The aims could be made a lot clearer, for instance aim G could read “Aim to reduce the number of journeys by car and increase public transport useage”.

The representor considers that developing green field sites is contrary to aims A, D and I.

Whilst aim B (minimising emissions of greenhouse gas) is welcomed it only relates to new development. Reducing green house gas emissions should be an overarching goal and more objectives and a clear plan of action are needed to achieve this.

Council Analysis

The aims have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose.

With regard to Aim B, the LDP is the framework document for the development and use of land. The Sustainable Development Strategy Living Better Using Less is the Council’s strategy to address minimising emission of greenhouses gas more generally

In terms of Aim B it is not merely intended to “reduce the number of journeys by car and increase public transport useage”, it is also the overarching aim to improve the strategic transport infrastructure and to improve the physical access to employment opportunities.

Recommendation

No amendment be made in respect of this representation

5199.P3 MR. RAYMOND. DAVIES

Representation

Objectives (Question 3)

The representor does not consider that the objectives are appropriate and that building on greenfield land is contrary to the following to objectives 2, 4, 8 and 11:

Council Analysis

The representor considers that the development of greenfield land is contrary to a number of objectives, in particular objectives 2, 4, 8 & 11. Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

The Deposit Replacement LDP **must** reconcile the development needs of the population, in terms of employment, housing, education, leisure, and importantly infrastructure, with the wider environmental concerns for the conservation of the man made and natural environment. Change is therefore inevitable and development is essential, both in terms of meeting our basic need, but also in terms of stimulating the economy for the benefit of present and future generations. Where development has been proposed it has been the subject of a robust planning assessment and the relevant statutory consultees have been consulted in order to ensure that any environmental concerns can be addressed or mitigated.

Recommendation

No amendment be made in respect of this representation

5199.P4 MR. RAYMOND. DAVIES

Representation

Level of growth (Question 4)

The representor disagrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

It is clear from the SA/SEA that this level of growth is the least sustainable of the options. It is particularly poor environmentally but is also not positive on cultural aspects. Therefore, this growth rate provides too much weight to the economic pillar of SD and will be a poor option to meet the duty and Goals required by the forthcoming Future Generations Act. Only the growth options A and B are assessed as sustainable when targeting growth at the mid and south corridors. It is incomprehensible why the least sustainable growth option has been chosen.

Whilst recognising the need for providing an appropriate level of growth in population and housing, the council's own assessment suggests that this level of growth is not sustainable for Caerphilly County Borough. It would seem that the council's own assessment of targeting growth to the mid Valleys would be the most logical option.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position..

The Council acknowledge that the sustainability appraisal found that the preferred strategy was not the most sustainable of the options. However, the overall aim of the SEA/SA process is to ensure that environmental and sustainability considerations are taken into account in the decision making of the LDP. Consequently whilst the findings of the Strategy Assessment found that another option was the most sustainable strategy, it does not necessarily mean that it is the strategy that should be adopted as the basis of the Deposit Replacement LDP, rather the findings of the assessment highlight considerations that the strategy might need to address. Further the Strategy Assessment does not take into account other considerations such as deliverability and viability, which are fundamental for a plan to be found sound.

Recommendation

No amendment be made in respect of this representation

5199.P5 MR. RAYMOND. DAVIES

Representation

Employment Land take up (Question 5)

The representor does not agree with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031.

Council Analysis

In determining the need for employment land, three alternative scenarios have been considered to inform the future need for employment land over the plan period. In addition to the preferred scenario (being the historic land take-up forecast), the Council also considered an Employment based forecast as well as a labour supply forecast, both of which are based on economic trends and

predictions. The historic land take-up forecasts a greater need than both other scenarios, therefore sufficient land should be allocated to provide for choice and flexibility.

Recommendation

No amendment be made in respect of this representation

5199.P6 MR. RAYMOND. DAVIES

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality; Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid.

Recommendation

No amendment be made to in respect of this representation

5199.P7 MR. RAYMOND. DAVIES

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in both the Mid Valleys Corridor and Southern Connections Corridor.

Strategically, the release of significant amounts of greenfield land for development will have detrimental impacts on other objectives.

1. It will further delay or prevent the cleanup and development of brownfield sites (Obj7). Brownfield land is more expensive in terms of money and time to develop. The previous LDP made the correct strategic decision in restricting the release of greenfield land in order to make the brownfield sites viable. Reversing this now, before most of the sites have been used up will produce further delay
2. The use of greenfield land is the primary cause (apart from growth rates) of negativity in the sustainability appraisal. The appraisal shows significant negative environmental impacts of this approach, as well as negative impacts on social and cultural sustainability. Therefore it is also not meeting (Obj 4) minimising environmental impact of new development.
3. Greenfield development will reduce accessible public open space and accessible natural greenspace. (Obj 2).
4. The previous LDP gave due recognition to the attractiveness of Caerphilly (and other areas in SCC) in terms of not only its favoured position for commuting to Cardiff and Newport but also its landscape setting and accessible natural countryside as the reason for its attractiveness to people to live. This is recognised and maintained in Objective 11. The new proposals now sacrifice this amenity value in the Caerphilly area in particular by proposing greenfield developments on special landscape and nature conservation areas, by encroaching to the bounds of common land and starting the coalescence of settlements in the SCC. Over a 15 year period this will reduce the attractiveness of the area and is likely to counteract the stated aim of net in migration.
5. 'Caerphilly Delivers' recognises biodiversity is declining in the county borough. It sets a goal to enhance environmental quality that is reflected in Aim A and Objectives 12 and 13. Unfortunately, the development of greenfield sites, where some of the candidate sites are already identified as of nature conservation value, will not help deliver this and will have a large negative effect. This is clear in the SEA/SA
6. Key Aim B is to minimise greenhouse gas emissions from new development. Whilst much of the strategy sensibly locates new development close to public transport hubs, the overall population growth strategy and many of the candidate greenfield sites will not reduce or even minimise emissions. This is a particular issue for many of the greenfield sites which are likely to be developed most quickly and well in advance of any improved public transport infrastructure. Therefore, a vital opportunity will be missed to encourage a shift in mode of transport at the moment that people move house. (Timing of encouragement to behaviour change has been demonstrated to be most effective when linked to such major changes). Coupled with the planned road improvements, there is likely to be an overall rise in car journeys

The proposal to release significant amounts of greenfield land is contrary to and does not contribute positively to many of the aims and objectives identified in the strategy.

Council Analysis

The representor disagrees with the release of significant amounts of greenfield land for development and considers that it will have a detrimental impact for a number of reasons.

The Representor considers that the release of greenfield land will delay or prevent the clean-up and development of brownfield sites and that the strategic decision to restrict the release of greenfield land (as per the current LDP) should be maintained.

It is important to note that Caerphilly County Borough Council has formally adopted 2 successive and successful plan strategies, which targeted new development in the south to brownfield land. As a result, many of the available previously developed sites have been developed, for example, Castlegate, Caerphilly Miners Hospital, Gas Works Site, Mill Road, Venosa Trading Estate, Pontypandy Industrial Estate. Three notable sites remain available, namely Bedwas Colliery, Waterloo and the former Ness Tar Plant. The Waterloo site is in the process of being remediated for redevelopment and has planning consent subject to the signing of a s106 agreement. Bedwas Colliery and the Ness Tar Plan remain available for redevelopment. The Council intends to continue to allocate all three of these sites in the Replacement LDP.

The re development of brownfield land is largely determined by viability. Put simply, where developer profit is sufficient, the land will be brought forward for development; conversely where the developer will not realise a profit, the site will remain undeveloped. The Council is required by Welsh Government to demonstrate that all sites allocated in the plan are deliverable within the plan period. Where there is uncertainty over viability due to significant site constraints, the Council is not able to rely on the housing figures for that site within the housing supply calculation.

Greenfield land will need to be released for development in addition to brownfield land within both the SCC and MVC. In terms of south east Caerphilly a greenfield site is proposed to facilitate the development of the Ness Tar Plant, thereby securing its remediation in the short to medium term. Further, by targeting development to a limited number of greenfield sites along important growth corridors this will prevent the proliferation of larger sporadic developments in the open countryside throughout the county borough and limit pressure on other environmentally sensitive areas. I

The Council acknowledge that the sustainability appraisal found that the preferred strategy was not the most sustainable option. 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 another option was the most sustainable, it does not necessarily mean that it is the strategy that should be adopted as the basis of the LDP review, rather the findings of the assessment highlight considerations that the strategy might need to address. Further, it does not take into account other considerations such as deliverability and viability, which are fundamental for a plan to be found sound.

The representor considers that the development of greenfield land will reduce accessible public open space and accessible natural greenspace. Many of the greenfield sites considered through this process are in private ownership and are not public open space or accessible natural greenspace in the any event. Some will have Public Rights of Way (PROW) across them however and any development will be required to incorporate such PROW within them.

The Preferred Strategy acknowledges the unique position of Caerphilly County Borough, at the heart of the Cardiff Capital Region and recognises both it's attractiveness and landscape setting as well as its important links to Cardiff and Newport. The development of greenfield land as part of the preferred strategy is not at odds with this.

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. As the representor notes, the strategy sensibly locates the majority of new development close to public transport hubs. This will not only encourage a modal shift from car borne journeys but also minimise greenhouse gas emissions in the longer term.

Recommendation

No amendment be made in respect of this representation

5199.P8 MR. RAYMOND. DAVIES

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the MVC & SCC, as development should be targeted to brownfield land in the first instance. There are ample pre-existing buildings, abandoned structures that should be considered first.

Council Analysis

The Representor objects to the inclusion of strategic sites due to their potential negative environmental impact. Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Whilst greenfield land will need to be released for development in addition to brownfield land, the sites that are allocated are those that are deemed to have the least impact on the environment. The Council will continue to allocate

brownfield land where it is suitable and available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed.

Recommendation

No amendment be made in respect of this representation

5199.P9 MR. RAYMOND. DAVIES

Representation

The representor is opposed to the release of greenfield land and considers that there has been a complete policy shift going from the protection of the countryside to its desecration.

Council Analysis

The Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

The Deposit Replacement LDP **must** however reconcile the development needs of the population, in terms of employment, housing, education, leisure, and importantly infrastructure, with the wider environmental concerns for the conservation of the man made and natural environment. Change is therefore inevitable and development is essential, both in terms of meeting our basic need, but also in terms of stimulating the economy for the benefit of present and future generations. Where development has been proposed it has been the subject of a robust planning assessment and the relevant statutory consultees have been consulted in order to ensure that any environmental concerns can be addressed or mitigated

Recommendation

No amendment be made in respect of this representation

1559.P1 MR. MARTIN. RICKARD

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. Caerphilly should not be considered as part of the 'Heart of Cardiff Capital Region' in terms of housing developments. Caerphilly should cater for its own needs and not the needs of Cardiff and other regions. Similarly, the representor does not agree with the 'exploitation' of the countryside. However sensitive small scale developments may be acceptable where it is beneficial, such as for amenities or employment opportunities. Any development in the south of the Caerphilly Basin along Caerphilly Mountain would be considered to be adverse exploitation.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose. At 'the heart of Cardiff Capital Region' is merely a locational reference as to where Caerphilly Borough lies within this region and does not imply that Caerphilly Borough is accommodating the needs of Cardiff.

The Deposit Replacement LDP **must** reconcile the development needs of the population, in terms of employment, housing, education, leisure, and importantly infrastructure, with the wider environmental concerns for the conservation of the man made and natural environment. Change is therefore inevitable and development is essential, both in terms of meeting our basic need, but also in terms of stimulating the economy for the benefit of present and future generations. Where development has been proposed it has been the subject of a robust planning assessment and the relevant statutory consultees have been consulted in order to ensure that any environmental concerns can be addressed or mitigated.

Recommendation

No amendment be made in respect of this representation

1559.P2 MR. MARTIN. RICKARD

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate.

The representor disagrees with the following key aims,

Aim A should be amended to read "Protect the environment as a whole with careful balancing" in order to protect the environment and avoid over development with housing

Aim B should be amended from merely aiming to 'minimise' greenhouse gases. The aim should be amended to reduce greenhouse gases such as reducing traffic (e.g. by not building more roads, reducing the need to travel, ensuring there is sufficient nearby employment, amenities and shops to populated areas).

Aim H should be amended to read supported by appropriate housing where housing does not encroach onto important landscapes (such as Caerphilly Mountain) and not at the expense of amenities and employment opportunities

Aim O in that the Principle Towns and Local Centres (especially Caerphilly Basin) should not be promoted where there is currently over-development of housing and a shortage of amenities and employment opportunities.

Aim Q, It should be clear that any housing caters for Caerphilly County and NOT Cardiff and other regions, to ensure there is no over-development and balanced planning with sustainable communities i.e. with adequate proportions employment land and for areas amenities, such as for adults young children and youths.

Council Analysis

The aims have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose.

In respect of aims A & H, the proposed amendments do not add further clarity therefore an amendment is not necessary.

In respect of aim H, it is necessary to release greenfield land for development in addition to brownfield land within the SCC and MVC. This will inevitably encroach in some instances into areas that were formally identified as important in landscape terms. However where such incursions are proposed this has been carefully balanced in terms of its impact on the wider landscape unit.

In respect of Aim O, the scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure.

The SCC strategy area does not seek to satisfy the need for housing to accommodate the workforce of Cardiff, rather it seeks to provide a choice and range of housing for residents within the county borough as a whole, whilst acknowledging the influence of Cardiff and Newport as major employment centres. The strategy seeks to improve public transport infrastructure to facilitate commuting to these destinations.

Recommendation

No amendment be made in respect of this representation

Representation

Objectives (Question 3)

The representor does not consider that the objectives are appropriate and objects specifically to Objective 1 &17.

Objective 1, the representor does not agree with the natural population growth concept because that it is based on inflow from other regions that have not been properly catered for in their own plan, rather than natural population changes specific to Caerphilly County.

Objective 17, the representor does not agree that Caerphilly should be part of Cardiff Capital Area and become a commuting area for them. Caerphilly Basin has suffered for years from housing over-development and deficiencies elsewhere. What is needed is to redress the imbalance of the current 'one way' flow to Cardiff with a more even two way flow of commuters to employment in Caerphilly Basin and the rest of the County.

Council Analysis

The SCC strategy area does not seek to satisfy the need for housing to accommodate the workforce of Cardiff, rather it seeks to provide a choice and range of housing for residents of the county borough, whilst acknowledging the influence of Cardiff and Newport as major employment centres. The representor is concerned about attracting new people to live and work within the borough. It is necessary to recognise the need to retain and attract younger working age people in the county borough in order to ensure the future economic prosperity of the area; and to help retain and sustain services and facilities. In determining the future population and household projection for the county borough, the Council considered a number of population and household growth scenarios. The Council determined that the moderate growth scenario was the most appropriate to underpin the preferred strategy. This scenario assumes a moderate Average Household Size (AHS) Change and uses the SE Wales Migration (10 Yr Average) in its projection.

This scenario was considered the most desirable, realistic and robust option to inform the level of Population and Household Growth up to 2031, for the following reasons:

- The assumptions in respect of births and deaths are realistic having regard for both long and short-term trends;
- The migration rates that informs this options are realistic and achievable having regard for long-term trends;
- The Average Household Size reducing to 2.21 over the plan period is realistic when long term trends are take into account;

- The house building rates of 600 dwellings per annum are realistic having regard to the long-term trends in the county borough;
- The level of house building proposed is achievable over the plan period having regard for economic cycles within the plan period;
- This option recognise the need to retain and attract younger working age people in the county borough in order to ensure the future economic prosperity of the area; and
- This level of growth would help retain and sustain services and facilities. In particular, it will help sustain school provision over the plan period.

No evidence has been submitted to challenge this position.

Recommendation

No amendment be in respect of this representation

1559.P4 MR. MARTIN. RICKARD

Representation

Level of growth (Question 4)

The representor disagrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

The representor considers that the housing requirement is not based on natural population change figures for the borough but on regional figures. The housing requirement should be based on Caerphilly's natural change in population which is in the order of + 3,500 (births – deaths) Not on in-migration which is not a sustainable or balanced strategy. The representor also expresses concern at the over supply of housing development at the expense of amenities.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position

Recommendation

No amendment be made in respect of this representation

1559.P5 MR. MARTIN. RICKARD

Representation

Employment Land take up (Question 5)

The representor does not agree with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 and believes that land allocated for employment purposes should take priority, on historic sites or new carefully selected strategic sites.

Council Analysis

In determining the need for employment land, three alternative scenarios have been considered to inform the future need for employment land over the plan period. In addition to the preferred scenario (being the historic land take-up forecast), the Council also considered an Employment based forecast as well as a labour supply forecast, both of which are based on economic trends and predictions. The historic land take-up forecasts a greater need than both other scenarios, therefore sufficient land should be allocated to provide choice and flexibility.

In order to ensure that there are sufficient employment opportunities within the county borough, the Deposit Replacement LDP will allocate both new land and provide protection for existing employment site allocations. Both policies are of equal importance in order to ensure choice and flexibility in terms of employment sites.

Recommendation

No amendment be made in respect of this representation

1559.P6 MR. MARTIN. RICKARD

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas. In particular the strategy does not reflect the role of the SCC as the strategic sites does not maximise the use of land for employment and leisure amenity.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality, Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid. The strategic site in the SCC is proposed for a mix of uses including housing, employment and leisure.

Recommendation

No amendment be made in respect of this representation

1559.P7 MR. MARTIN. RICKARD

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in the Southern Connections Corridor for housing. The representor believes that Caerphilly basin is already overdeveloped and that new housing is not required. Instead sites such as the strategic site should be allocated for leisure and employment use to address the deficiency in amenity provision and to provide employment opportunities within Caerphilly thus reducing the outflow of commuters into Cardiff.

Releasing greenfield land to accommodate the development of the Tar Plant would be an inappropriate reason. The result would be to harm the natural environment that is a valuable visual landscape at the foothills of the important recreational area of Caerphilly Mountain.

Council Analysis

The representor disagrees with the release of significant amounts of greenfield land within the SCC for development and considers that it will have a detrimental impact.

The representor considers that the SCC is already overdeveloped. The scale of the proposals to be targeted to each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure and further it will also be based on the deliverability and viability of development.

The Preferred Strategy identifies the Ness Tar Plant as a strategic site in the SCC, which is proposed for a mix of uses including housing, employment and leisure.

Recommendation

No amendment be made to in respect of this representation

1559.P8 MR. MARTIN. RICKARD

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the SCC. Releasing greenfield land to accommodate the development of the Tar Plant would be an inappropriate reason. The result would be to harm the natural environment that is a valuable visual landscape at the foothills of the important recreational area of Caerphilly Mountain.

Council Analysis

The Ness Tar Plant Strategic site has been subject to a robust assessment to determine its suitability or otherwise for development. Where ecological or landscape issues have been identified, the Council will require the developer to suitably mitigate against any negative effect of development through appropriate measures such as good quality design, the integration of biodiversity, the implementation of an appropriate landscaping strategy, etc.

Recommendation

No amendment be made in respect of this representation

Representation

Caerphilly South East By-Pass

- The representor objects to the proposal for a south east by-pass for the following reasons:
 - Attract more traffic into the Basin thus increasing car emissions, air pollution and damaging the health of the population.
 - Not solve the need to reduce dependency on cars.
 - Not solve congestion in the Basin but merely move it another part. Any current short term queues into the town would reappear even worse at Crossways roundabout. Increased traffic is likely to cause the same congestion in town as before, as cars try to avoid the queues created elsewhere.
 - Severely damage the visually and flora/fauna important landscape of the Mountain .
 - Be worryingly perceived by some parties as an opportunity to develop the top of Caerphilly Mountain and put more pressure on a Thornhill motorway junction. Both of which would, to its detriment, further increase traffic into the Basin, thus destroying Caerphilly's special identity
 - Adversely destroy agricultural land with a working farm, which should be preserved even if the existing tenant leaves – thus providing a benefit to the land use mix in the Basin
-

Council Analysis

The Caerphilly Basin does experience limited congestion, particularly along the northern bypass. Natural traffic growth (without new development) will increase levels of congestion throughout the Caerphilly Basin over time. Consequently the highway network in the Caerphilly Basin will become increasingly congested without any development taking place.

There are a number of highway schemes that could be implemented to improve the efficiency and effectiveness of the network, but this will be dependent on funding. The main source of funding for these schemes is the Community Infrastructure Levy, but this funding can only be raised through development. Consequently development is necessary to provide funding to alleviate existing highway issues.

The council has undertaken a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment identified that, as proposed with the first phase of the South East Bypass, traffic within the Town Centre will be reduced (so reducing congestion and emissions), which will assist in improving air quality in the Air Quality Management Area (AQMA). It also identified that there would be increased traffic levels across the northern bypass and improvements to the junctions and links would be required. These improvements have been identified in the Deposit Replacement LDP.

The assessment also considered impacts where the full South East Bypass had been provided and this realised a more general spread of traffic around the ring road, although some of the junctions do require improvement to reduce congestion levels.

In respect of the Ness Tar Site, the Deposit Replacement LDP allocates the site as a strategic site, delivering the first phase of the South East Bypass which is required as part of a suite of interventions to improve air quality in the Caerphilly AQMA. The site is particularly well located to make the best use of sustainable transport, being located adjacent to the existing rail/bus interchange and within walking distance of the town centre. Whilst the site will generate traffic that will have an impact on the highway network, this will be minimised by the potential for travel by sustainable modes. It is accepted that modal shift is only likely to form a small proportion of the overall trips at the start of the Replacement Plan period, but when the impacts of measures proposed in the Cardiff LDP are felt outside of the Cardiff City boundaries it is highly likely that significant increases in modal shift will be realised.

Overall the proposed development will increase the level of traffic on the highway network, but development is also the source of funding for the improvements necessary to minimise the impact of increased traffic. The development of the Ness tar site will also provide the first phase of the South East Bypass which will redistribute traffic from the town centre, alleviating congestion and assisting in improving air quality in the town centre.

It has always been a council aspiration to complete the ring road around Caerphilly by implementing the South East Bypass (SE Bypass) to provide alternatives for through traffic that did not use town centre routes. However the business case for the provision of the bypass was not sufficiently positive for it to receive funding and be implemented.

In 2010 the Caerphilly Town Centre Air Quality Management Area (AQMA) was designated due to the fact that air quality levels were below the required standards. In November 2014 the Welsh Government approved the Air Quality Action Plan (Action Plan) prepared by the council to address air quality issues in the Caerphilly AQMA. The Action Plan sets out a suite of measures that will cumulatively improve air quality in the town centre. The Action Plan identifies the provision of the SE Bypass is necessary as one of its measures to assist in improving air quality. Modelling work, undertaken as part of the background work for the Action Plan, identified that the provision of the SE Bypass would reduce traffic in the town centre leading to a reduction in emissions. This is further supported by the findings of the strategic traffic impact assessment that the council has undertaken in support of the Deposit Replacement LDP. This assessment identified that the provision of the SE Bypass, either just the first phase or the complete bypass, would reduce traffic levels in the town centre.

Consequently the primary driver for the SE Bypass is improving air quality in the Caerphilly AQMA, by redistributing existing traffic around the edge of the town rather than through the town centre.

It should be noted that traffic levels will increase, but this is due to the need to develop land to meet housing and employment needs and the increased traffic is not a result of providing the SE Bypass. Given this it is concluded that the SE Bypass is a necessary measure as part of the actions being taken in respect of the Caerphilly AQMA and seeks to redistribute existing and future traffic rather than create more traffic.

The strategy for the Deposit Replacement LDP seeks to locate growth close to Caerphilly Town Centre, to maximise opportunities for sustainable transport. The town centre for Caerphilly is located toward the south east boundary of the town and, as such, the best location for development to meet this strategic principle is to the south east of the town.

Developing to the west of Caerphilly would locate the growth away from sustainable transport and would be close or on important highway links. This is likely to realise very little modal shift to sustainable transport and would encourage car borne trips instead. Therefore, developing on the western side of Caerphilly would be less sustainable, in transport terms, than focussing growth on the south east.

It is a council aspiration to reinstate the Caerphilly-Machen-Newport rail line (Machen Line) for passenger transport. A feasibility study undertaken by the former regional transport group SEWTA, identified that it was feasible to bring the line back to beneficial use. The reopening of the route for passenger transport would provide a much needed east west link to Newport. However, the reinstatement of the route would not be sufficient to accommodate the traffic growth associated with the Replacement LDP on its own.

The Replacement LDP sets out a suite of policies and allocations that seek to promote modal shift to sustainable transport modes and improve the efficiency of the highway network through redistributing existing travel patterns and making selected improvements to the highway network. It is this package of measures that will deliver the transport infrastructure required to accommodate travel needs throughout the plan period and, therefore, provision of the new rail line will not, in itself, be sufficient to accommodate travel needs.

It should be noted that funding for rail improvements is vested with the Welsh Government and funding for any improvements is likely to come through the Cardiff City Region Metro project, with funding being outside the control of the county borough. Welsh Government does not currently offer funding for highway improvements and, as such, the highway improvements identified in the Replacement LDP will primarily be funded through the council's Community Infrastructure Levy (CIL). CIL is a tax on development that is paid by developers and is used to provide infrastructure necessary to facilitate development in accordance with the development plan. Given that CIL does not become liable for payment until after development has commenced, it is necessary to commence development prior to the highway improvements being provided in order to ensure funding. Consequently it is inappropriate to resist development until improvements are made as funding would not be available to implement them.

Recommendation

No amendment be made to in respect of this representation

1559.P10 MR. MARTIN. RICKARD

Representation

The Preferred Strategy should plan for Caerphilly County Borough and not for the Cardiff Capital Region

Council Analysis

The Preferred Strategy area does not seek to satisfy the need for housing to accommodate the workforce of the Cardiff Capital Region, rather it seeks to provide a choice and range of housing for residents within the county borough, whilst acknowledging the influence of Cardiff and Newport as major employment centres. The strategy seeks to improve public transport infrastructure to facilitate commuting to these destinations.

Recommendation

The comments be noted

1559.P11 MR. MARTIN. RICKARD

Representation

Leisure provision

The plan should provide adequate leisure provision in line with the National Playing Field Standards.

Council Analysis

The Deposit Replacement LDP recognises that some parts of the county borough have a shortfall in formal leisure provision. Where this is the case, land is identified for the provision of new leisure facilities over the plan period.

Recommendation

The comments be noted

1559.P12 MR. MARTIN. RICKARD

Representation

The Council should prioritise the following Strategy Policies:

SP17 Countryside Recreation

SP19 Protection of Strategic Leisure Network

SP23 Managing Employment Growth

Council Analysis

The Council considers that all Strategy Policies are of equal importance and would therefore not seek to prioritise individual policies.

Recommendation

No amendment be made in respect of this representation

1559.P13 MR. MARTIN. RICKARD

Representation

STM002 Caerphilly Golf Course

The representor considers that this site should not be developed for housing but should be maintained as a golf course.

Council Analysis

The Deposit Replacement LDP does not presently allocate the Caerphilly Golf Course for housing.

Recommendation

No amendment be made to in respect of this representation

1559.P14 MR. MARTIN. RICKARD

Representation

The Plan should not exacerbate housing over-development, nor embark on a policy that results in the over-provision of housing

Council Analysis

In making provision for housing land it is good practice to allocate more land than that required to allow for choice and flexibility. The amount of over provision is not prescribed in national planning guidance, but it is best practice for local authorities to assume approximately 10% over-allocation. The Deposit Replacement LDP also proposes a 10% flexibility allowance.

Recommendation

No amendment be made in respect of this representation

1559.P15 MR. MARTIN. RICKARD

Representation

Redressing Imbalance

The plan should aim to redress imbalance by locating employment opportunities / leisure in areas where there are deficiencies.

Council Analysis

Strategy Policy 23 – Managing Employment Growth, makes provision for the development of 55 Ha of employment land in the County Borough up to 2031 to meet the identified need for 29 Ha. This over allocation is to allow for flexibility and choice and this requirement will be met through a diverse range of employment sites located throughout the county borough.

Strategy Policy 19 – Protection of the Strategic Leisure Network seeks to protect the important network of public open space and recreational facilities from inappropriate development. Strategy Policy 11 – Planning Obligations, criterion F, enables the Council to seek where necessary on site formal and informal open and leisure space through planning obligations where they are required to meet local needs and make development more sustainable. Further specific land use allocations are identified in areas where there is a recognised shortfall in provision.

Recommendation

The comments be noted

1559.P16 MR. MARTIN. RICKARD

Representation

Strategy Policy 23 – Managing Employment Growth

The representor considers that employment sites should be prioritised and placed near public transport nodes

Council Analysis

The Deposit Replacement LDP sensibly locates the majority of new development close to public transport hubs.

Recommendation

The comments be noted

1559.P17 MR. MARTIN. RICKARD

Representation

Ness Tar

The representor has expressed concern that the Ness Tar site is severely contaminated and would require extensive remediation resulting in massive ground disturbance that would pose health risks and water pollution.

Council Analysis

The Ness Tar site has already been subject to a number of ground investigations to determine the degree, nature and extent of contamination and its implications for site reclamation and re-use. The

ground investigation report addresses issues of water quality and also identifies an appropriate remediation strategy in order for the site to be able to accommodate a suitable after use.

The remediation strategy is a detailed planning matter and will be considered by the Council's Environmental Health Pollution Control Team at planning application stage to ensure that the remediation strategy is satisfactory, deals with contamination effectively and poses no risk to the health of residents.

Recommendation

The comments be noted

5108.P1 MR. LYN. POWELL – RPS

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5108.P2 MR. LYN. POWELL – RPS

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate.

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5108.P3 MR. LYN. POWELL – RPS

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5108.P4 MR. LYN. POWELL – RPS

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

5108.P5 MR. LYN. POWELL – RPS

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5108.P6 MR. LYN. POWELL – RPS

Representation

Strategy Areas (Question 6)

The representor agrees that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

Council Analysis

The representor's support for the three strategy areas identified in the preferred strategy and agrees that they reflect the role and function of settlements in those areas is welcomed.

Recommendation

The support be noted

5108.P7 MR. LYN. POWELL – RPS

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in the Southern Connections Corridor for housing. The representor believes that greenfield land should only be released if there are no alternative brownfield sites available and deliverable in locations attractive to the housebuilding market.

Council Analysis

The Council will continue to allocate brownfield land where it is suitable and available for development. However due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land

Recommendation

No amendment be made in respect of this representation

5108.P8 MR. LYN. POWELL – RPS

Representation

Strategic Sites (Question 8)

The representor agrees with the proposal for a strategic site in the MVC & SCC.

Council Analysis

The representor's support for a strategic site in the MVC and SCC is welcomed.

Recommendation

The support be noted

5052.P1 MR. DEREK. DAVIES

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5052.P2 MR. DEREK. DAVIES

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate.

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5052.P3 MR. DEREK. DAVIES

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5052.P4 MR. DEREK. DAVIES

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in the Southern Connections Corridor for housing.

Council Analysis

The Council will continue to allocate brownfield land where it is suitable and available for development. However due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land

Recommendation

No amendment be made in respect of this representation

5052.P5 MR. DEREK. DAVIES

Representation

The representor considers that infrastructure such as schools, GP surgeries, roads etc should keep pace with development and that existing infrastructure problems should not be exacerbated by additional development.

Council Analysis

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure.

Recommendation

The comments be noted

4631.P1 THE THEATRES TRUST

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose.

The representor is concerned that the first revision document does not properly acknowledge the importance of social and cultural wellbeing. Wellbeing is more than just access to doctors and playing fields, it is having a sense of satisfaction with life. Social and cultural wellbeing includes the unmeasurable personal experiences that make us happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision and protection of a variety of community and cultural infrastructure for tourism (e.g. cultural heritage) and town centre vitality (e.g. cultural facilities) etc. are vital for their contribution to residents' and visitors' life satisfaction.

For clarity, the representor suggests that the health and wellbeing policies use this clear description for 'community facilities' which would obviate the need to provide examples:

Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

This would then clearly include cultural facilities such as theatres, cinema, music venues (usually in pubs), and libraries, which all contribute to residents' and visitors' wellbeing and life satisfaction.

In line with the above definition, the representor recommends a change to the final paragraph of the vision:

Access to the surrounding countryside and our natural environment will be exploited where appropriate, and will complement the provision of a strategic network of community facilities that are easy to access; encourage healthy active lifestyles; and promote the well being of residents and visitors alike.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and the Council considers that it is fit for purpose. The representor considers that the vision doesn't sufficiently acknowledge the importance of social and cultural wellbeing. This is sufficiently addressed by the key aims and objectives that support the strategic vision, in particular aim L.

Recommendation

No amendment be made to in respect of this representation

4631.P2 THE THEATRES TRUST

Representation

LDP Aims (Question 2)

The representor does not agree that the aims outlined remain appropriate.

Key Aim H & I, page 17

The representor recommends the inclusion of this additional aim:

Promote the protection and enhancement of existing community facilities and the provision of new community facilities to contribute to social and cultural wellbeing.

Council Analysis

The Representor considers that aims H & I require amendment, to be amalgamated into a single aim. The LDP aims have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose. However a number of aims have been modified to reflect comments raised and it is considered that Aim L as redrafted addresses the representors concerns.

Recommendation

No amendment be made in respect of this representation

4631.P3 THE THEATRES TRUST

Representation

Objectives (Question 3)

The representor does not consider that the objectives are appropriate

Key Objective 21, page 29

The representor recommends the following amendment:

Protect and provide a wide range of community and health facilities which are appropriately located and easily accessible, and which meet the needs of all sections of the population.

Council Analysis

The LDP objectives have been developed in partnership with the Local Service Board and partner organisations and the Council considers that they are fit for purpose. It is not appropriate to remove the term 'health'.

Recommendation

No amendment be made in respect of this representation

4631.P4 THE THEATRES TRUST

Representation

Strategy Policy SP20 Health & Well Being

Policy SP20, p18

The representor recommends the following amendment to SP20:

The Council will safeguard existing community facilities and suitable land for the development of new community facilities in order to ensure that an adequate network of provision can be made at accessible locations across the County Borough to contribute to the health and wellbeing of residents over the Plan period. Where a community facility has reached the end of its useful life for its existing function, its reuse for other community needs should be considered before release for other development.

The representor recommends this because the cost of land means that community and cultural facilities may come under pressure from uses that attract higher land values and without protection against this, the community may lose an accessible facility. Once these sites are lost to other uses it can be very difficult to find alternative sites. Demand for different types of community facilities will change over time but it is important that these premises are retained to meet the future needs of residents and visitors. The safeguarding of existing community facilities will help to realise the potential for community use of existing buildings and encourage reuse of buildings when they become available.

Alternatively, a separate policy for the protection and enhancement of tourism and cultural facilities could be created.

Council Analysis

The Council considers that Strategy Policy 20 Health and Well Being adequately addresses the need for sufficient provision of community, leisure and educational facilities in order to ensure that an adequate network of provision can be made accessible at locations across the county borough.

The Deposit Replacement LDP will include a Countywide Development Management Policy, which addresses the concerns raised.

Recommendation

No amendment be made to in respect of this representation

5092.P1 MR. MARK. JONES

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5092.P2 MR. MARK. JONES

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate.

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5092.P3 MR. MARK. JONES

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5092.P4 MR. MARK. JONES

Representation

Community facilities – Ty Sign

The representor is concerned about the lack of community facilities in Ty Sign estate and the lack of a community based building from which to base activities. The representor would like to see any further development in this area accompanied by a new community facility.

Council Analysis

The representation is noted.

Recommendation

The comments be noted

09.P1 COUNCILLOR E.M. ALDWORTH

Representation

The representor notes that Caerphilly is part of the Cardiff Capital Region

Council Analysis

The Preferred Strategy acknowledges the unique position of Caerphilly County Borough, at the heart of the Capital City Region and recognises both it's attractiveness and landscape setting as well as its important links to Cardiff and Newport.

Recommendation

The comments be noted

09.P2 COUNCILLOR E.M. ALDWORTH

Representation

Out-of-town Retail, Non-bulky, Comparison Goods

The representor notes that whilst Principal Town Centres are serviced by bus routes, a lot of comparison shopping spend is still being lost to shops located outside the borough, and therefore recommends an allocation for an out of centre retail park for comparison, non-bulky A1 within the county borough.

Council Analysis

The representation is noted. Paragraph 7.43 of the Preferred Strategy identifies the need to reconsider the designation of Gallagher Retail Park as part of the review process informing the Deposit Replacement LDP. This work has been completed and a policy to adequately control the development of out-of town retail parks is included within plan.

Recommendation

The comments be noted

09.P3 COUNCILLOR E.M. ALDWORTH

Representation

Caerphilly Principal Town

The representor considers that Caerphilly Town Centre is unique, with the focal point being the historic castle. The strategy should capitalise on the strengths of Caerphilly Town as a tourism destination in order to bring wider economic benefit and footfall into the town.

Council Analysis

The representor's comments are noted.

Recommendation

The comments be noted

09.P4 COUNCILLOR E.M. ALDWORTH

Representation

The representor objects to road closures for tourism events (Marathons, Velathons etc) due to the economic impact that it has on the wider area and recommends that all five country parks should be the focus for such activities in future.

Council Analysis

The Council note the above representation, however this is not a matter for the Deposit Replacement LDP to address.

Recommendation

No amendment be made in respect of this representation

09.P5 COUNCILLOR E.M. ALDWORTH

Representation

The representor is keen to encourage a learning environment, increasing the educational attainment of the borough and the number of people with basic skills, including the prospects of gaining such skills.

Council Analysis

Strategy Policy 20 Health and Wellbeing seeks to safeguard suitable land for the development of community, leisure and education facilities in order to ensure that an adequate network of provision can be made at accessible locations across the county borough to contribute to the health, educational attainment, social care and well being of residents.

Recommendation

No amendment be made to in respect of this representation

09.P6 COUNCILLOR E.M. ALDWORTH

Representation

BTM008 Land West of Chestnut Close, Machen

The representor is concerned about the level of contamination on this site and states that the level of contamination needs to be determined prior to this site being considered as an allocation for housing.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where remediation of a site is required, this is a detailed planning matter that will be considered by the Council's Environmental Health Pollution Control Team at planning application stage to ensure that the remediation strategy is satisfactory, deals with contamination effectively and poses no risk to the health of residents.

Recommendation

The comments be noted

5282.P1 MS. L. WINTERSON & MR. G. DOHERTY

Representation

Strategy Policy 13 – Renewable Energy: Local Areas of Search

The Manmoel Area has been assessed by Land Map, in the visual and sensory category as being of high and rare value. The SEA/SA of the LDP review Scoping Report (CH18) acknowledges that this area is of international/national importance.

The representor therefore strongly believes that the Manmoel Area should be precluded from a Local Area of Search and should remain as a Special Landscape Area.

Council Analysis

Council Analysis

Work undertaken into the Local Areas of Search has been superseded by the Renewable Energy Baseline Assessment and the Renewable Energy Background document that indicates that Wind Turbine applications should continue to be assessed on a case by case basis and as such it is no longer proposed to include Local Areas of Search within the Deposit Replacement LDP.

Supplementary Planning Guidance has been prepared which provides an indication of those areas where renewable energy (wind turbines) may prove to be acceptable and conversely where they would not be acceptable subject to their scale. The 'Landscape Sensitivity and Capacity Study: Smaller Scale Wind Turbine Development also provides detailed guidance on the information required as part of a Landscape Visual Impact Assessment for planning applications.

Recommendation

The comments be noted.

5228.P1 MR. MALDWYN. THOMAS

Representation

ABB002 / HG1.22 Bedwellty School

The representor considers that if this site were to be carried forward into the new plan, then it should remain as per its allocation in the 2010 LDP, with LE4.5 safeguarding the playing fields.

Council Analysis

The Deposit Replacement LD P continues to allocate the Bedwellty School Ste for housing development, whilst the leisure area continues to be protected for leisure use.

Recommendation

The comments be noted

5228.P2 MR. MALDWYN. THOMAS

Representation

BLA001 Land at Pencoed Fawr Farm, Bedwellty

The representor considers that this site is not suitable for development as it is agricultural land and open countryside, crossed by a number of ancient rights of way, which are still used and enjoyed by local inhabitants. Furthermore the local road network could not accommodate the level of traffic generated by the development of this site.

Council Analysis

Each candidate site has been subject of a rigorous and robust assessment to determine its suitability or otherwise for development. Where the Council is minded to allocate land in the Deposit Replacement LDP, due consideration has been given to the impact that such development is likely to have on the existing infrastructure. Where public rights of way exist they will be incorporated into new developments.

Recommendation

The comments be noted

5217.P1 MR. JEREMY. BLADON

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5217.P2 MR. JEREMY. BLADON

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate.

Council Analysis

The support for the aims is welcomed.

Recommendation

The support be noted

5217.P3 MR. JEREMY. BLADON

Representation

Objectives (Question 3)

The representor considers that the objectives are appropriate

Council Analysis

The support for the objectives is welcomed.

Recommendation

The support be noted

5217.P4 MR. JEREMY. BLADON

Representation

Level of growth (Question 4)

The representor agrees that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

Council Analysis

The support for a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is welcomed.

Recommendation

The support be noted

5217.P5 MR. JEREMY. BLADON

Representation

Employment Land take up (Question 5)

The representor agrees with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031

Council Analysis

The support for the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031 is welcomed.

Recommendation

The support be noted

5217.P6 MR. JEREMY. BLADON

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor agrees with the release of greenfield land in the Mid Valleys Corridor and Southern Connections Corridor for housing.

Council Analysis

The support for the release of greenfield land in the Mid Valleys Corridor and Southern Connections Corridor for housing is welcomed.

Recommendation

The support be noted

5217.P7 MR. JEREMY. BLADON

Representation

Strategic Sites (Question 8)

The representor agrees with the proposal for a strategic site in the MVC & SCC.

Council Analysis

The representor's support for a strategic site in the MVC and SCC is welcomed.

Recommendation

The support be noted

5217.P8 MR. JEREMY. BLADON

Representation

Strategy Policy 13 – Renewable Energy: Local Areas of Search

The representor welcomes the stance taken by the Council regarding the development of wind energy within the defined Areas of Search and the presumption in favour of the development of

wind turbines within these areas, subject to not having an adverse effect on other key environmental considerations.

However, in the absence of any detailed criteria on what constitutes environmental harm, it is assumed that the Council will rely on advice provided by national government through, in particular, TAN8.

The latest version of Planning Policy Wales confirms that planning policy at all levels should facilitate delivery of both the Assembly Government's overall Energy Policy Statement and UK and European targets for renewable energy. The key issue that now has to be addressed is that of the accelerated need for delivery since the targets set for up to 2015/17 are clearly not being met.

As currently drafted, Policy SP13 does not make it clear as to how Areas of Local Search relate to defined boundaries. There appears to be no definition within the Plan of the boundaries of the proposed Areas of Search. Are these available in another document and, if so, they should be referred to and cross referenced.

Policy SP13 goes on to state that, outside of the Areas of Local Search, wind turbines will not be permitted. It is considered that the wording proposed is too restrictive and does not accord with national policy guidance. Whilst the Areas of Local Search may provide the most appropriate location for wind turbines, other locations may be suitable depending on their individual site characteristics. Indeed, this is the approach recommended in Paragraph 2.4 of TAN8, which states: "if there is robust evidence that land outside (but close to) the SSA is suitably unconstrained local planning authorities might wish to consider the possibility of development of wind farms in these areas as well"

As such, it is recommended that more flexible wording is introduced to allow for the potential that sites outside of Local Areas of Search may be appropriate for wind farm development, depending on their individual merits.

Council Analysis

Work undertaken into the Local Areas of Search has been superseded by the Renewable Energy Baseline Assessment and the Renewable Energy Background document that indicates that Wind Turbine applications should still be assessed on a case by case basis.

Supplementary Planning Guidance has been prepared which provides an indication of those areas where renewable energy (wind turbines) may prove to be acceptable and conversely where they would not be acceptable subject to their scale. The 'Landscape Sensitivity and Capacity Study: Smaller Scale Wind Turbine Development also provides detailed guidance on the information required as part of a Landscape Visual Impact Assessment for planning applications.

There is no need to apply flexible wording to this policy as the policy has been amended in line with the background documents indicated above.

Recommendation

The comments be noted.

5165.P1 MR. STUART. LEA

Representation

Caerphilly Town – Principal Town

Identify and promote Caerphilly Town for its unique tourism opportunities offered by Caerphilly Castle. Identify Caerphilly Town as a visitor destination and encourage redevelopments such as a restaurant quarter etc that would encourage visitor spend.

Council Analysis

The Preferred Strategy recognises the tourism potential of Caerphilly Town and the unique tourism opportunities provided by the Castle. The Deposit Replacement LDP identifies a commercial opportunity area at Park Lane in Caerphilly.

Recommendation

The comments be noted

5165.P2 MR. STUART. LEA

REPRESENTATION TEXT

Caerphilly Town – Principal Town

The representor considers that there is the potential for a commercial opportunity area within Caerphilly Town Centre, with the demolition of a building backing onto Lloyds that would unveil the Court House Building and the pedestrianisation of this area.

COUNCIL ANALYSIS

The Deposit Replacement LDP identifies the site in question as a commercial opportunity area (Park Lane in Caerphilly).

Recommendation

The comments be noted

5000.P1 MR. BLEDDYN. WILLIAMS

Representation

LDP Vision (Question 1)

The LDP Vision statement is not fit for purpose. Caerphilly should not be considered as part of the 'Heart of Cardiff Capital Region' in terms of housing developments. Caerphilly should cater for its own needs and not the needs of Cardiff and other regions.

Council Analysis

The Strategic Vision has been developed in partnership with the Local Service Board and partner organisations and it is fit for purpose. At 'the heart of Cardiff Capital Region' is merely a locational reference as to where Caerphilly Borough lies within this region and does not imply that Caerphilly Borough is accommodating Cardiff's needs.

Recommendation

No amendment be made in respect of this representation

5000.P2 MR. BLEDDYN. WILLIAMS

Representation

LDP Aims (Question 2)

The representor agrees that the aims outlined remain appropriate, but believes that the preferred strategy does not concur with the aims.

Council Analysis

The support for the aims is welcomed

Recommendation

The support be noted

5000.P3 MR. BLEDDYN. WILLIAMS

Representation

Objectives (Question 3)

The representor considers that the objectives are not appropriate, in particular key objective 1 that makes reference to 'population growth'. The representor believes that population 'growth' is unsustainable and that a population decline would be preferable.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position.

Recommendation

No amendment be made in respect of this representation

5000.P4 MR. BLEDDYN. WILLIAMS

Representation

Level of growth (Question 4)

The representor does not agree that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate. The representor believes that the

level of growth should not factor in migration, in particular migration from EEC countries or Africa as the borough is unlikely to be attractive to economic migrants as it is within a low GDP area.

The representor considers that the increase in population is unsustainable and unnecessary and that a reduction in population would not mean a loss in existing services, it would merely mean tailoring services to the existing population.

Council Analysis

In determining the future population and household projection for the county borough, the Council considered a number of population and household growth scenarios. The Council determined that the moderate growth scenario was the most appropriate to underpin the preferred strategy. This scenario assumes a moderate Average Household Size (AHS) Change and uses the SE Wales Migration (10 Yr Average) in its projection.

This scenario was considered the most desirable, realistic and robust option to inform the level of Population and Household Growth up to 2031, for the following reasons:

- The assumptions in respect of births and deaths are realistic having regard for both long and short-term trends;
- The migration rates that informs this options are realistic and achievable having regard for long-term trends;
- The Average Household Size reducing to 2.21 over the plan period is realistic when long term trends are take into account;
- The house building rates of 600 dwellings per annum are realistic having regard to the long-term trends in the county borough;
- The level of house building proposed is achievable over the plan period having regard for economic cycles within the plan period;
- This option recognise the need to retain and attract younger working age people in the county borough in order to ensure the future economic prosperity of the area; and
- This level of growth would help retain and sustain services and facilities. In particular, it will help sustain school provision over the plan period.

The representor does not provide any evidence to require any modification to be made.

Recommendation

No amendment be made in respect of this representation

5000.P5 MR. BLEDDYN. WILLIAMS

Representation

Employment Land take up (Question 5)

The representor does not agree with the approach of using historic take up of employment land to determine the amount of employment land to be provided up to 2031. The representor believes that there are low economic activity rates and low employment levels within Caerphilly that are attributable to the lack of employment opportunities, thus the historic take up of employment land has not been enough to create a good economy.

Council Analysis

In determining the need for employment land, three alternative scenarios have been considered to inform the future need for employment land over the plan period. In addition to the preferred scenario (being the historic land take-up forecast), the Council also considered an Employment based forecast as well as a labour supply forecast, both of which are based on economic trends and predictions. The historic land take-up forecasts a greater need than both other scenarios, therefore sufficient land should be allocated to provide choice and flexibility.

Recommendation

No amendment be made in respect of this representation

5000.P6 MR. BLEDDYN. WILLIAMS

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas. The representor believes that within the SCC, there is very little community of interest or similarities between Caerphilly Basin and the Risca area.

Council Analysis

The Council considers that the three strategy areas are appropriate and broadly reflect the Wales Spatial Plan, which divided SE Wales into two spatial zones based upon their functionality.

Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor which is further sub divided into Caerphilly Basin and Lower Islwyn where the influence of Cardiff and Newport is much more marked. The SCC recognises the marked influence of Newport on Lower Islwyn and Cardiff on Caerphilly Basin. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid.

Recommendation

No amendment be made in respect of this representation

5000.P7 MR. BLEDDYN. WILLIAMS

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in the Mid Valleys Corridor and Southern Connections Corridor for housing and believes that greenfield land should only be released where a demonstrable need exists.

Council Analysis

It is agreed that greenfield land should only be released where there is a demonstrable need for that development. This is precisely the situation in the SCC where there is an acute shortage of affordable homes and a need for housing more generally to meet the needs of the existing and future population.

Recommendation

No amendment be made to in respect of this representation

5000.P8 MR. BLEDDYN. WILLIAMS

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the MVC & SCC. The strategic site at Maesycwmmmer is a greenfield site and is productive for agricultural purposes and leisure, whilst the strategic site within the SCC is mostly greenfield, with the brownfield element of the Ness Tar site being more appropriately suited as an employment allocation to encourage employment creation as part of the Cardiff Capital Region.

Council Analysis

The Council in developing the Preferred Strategy, identified and tested a number of different spatial options. In considering the spatial options, the Council examined the elements of the spatial options and selected the best elements in order to develop the Preferred Strategy. An integral part of this strategy is an emphasis on the development of sustainable and appropriate roles for each settlement that will provide the context for managing the scale and type of development that will be permitted in different locations.

The scale of the proposals to be targeted at each of the strategy areas is based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one within the southern connections corridor at South East Caerphilly and the other within the mid valleys corridor along the A472 strategic highway corridor at Maesycwmmmer

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Both strategic sites are proposed to be allocated for mixed use development comprising housing and leisure uses. It is proposed that Ness Tar will also include an element of employment as part of the mix of uses in order to capitalise on the site's strategic location.

Recommendation

No amendment be made in respect of this representation

5000.P9 MR. BLEDDYN. WILLIAMS

Representation

Cardiff City Region Metro

The representor considers that the Preferred Strategy uses the prospect of the implementation of a Cardiff Metro to facilitate housing development. Even if implemented this will have little impact on modal split or improving accessibility for people in the Caerphilly Basin.

Council Analysis

The Preferred Strategy acknowledges the implementation of the electrification of the railway lines but does not use it as a justification for the level of population and household growth. The Preferred Strategy Paragraph 3.35 identifies that the electrification of the rail lines will enable and facilitate future expansion and improvement of rail services throughout the county borough and the SE Region affording improved access to job opportunities within the region.

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The strategy does however, sensibly locate the majority of new development close to public transport hubs, in order to encourage a modal shift from car borne journeys.

Recommendation

No amendment be made in respect of this representation

5000.P10 MR. BLEDDYN. WILLIAMS

Representation

Leisure Provision – Caerphilly Basin

There is a shortfall in the Caerphilly Basin of 100 Ha of land for formal recreation

Council Analysis

As part of the evidence base to inform the Deposit Replacement LDP, detailed analysis of current facilities and demand has been examined together with the potential newly arising need generated by population growth. This evidence informs the provision of land for the development of new facilities within the Deposit Replacement LDP.

Recommendation

The comments be noted

215.P1 MONO CONSULTANTS LIMITED

Representation

Inclusion of a Telecommunications policy in the Emerging Plan

The representor considers that a concise and flexible telecommunications policy should be included in the emerging Local Development Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against. We would suggest a policy which reads:

Proposals for telecommunications development will be permitted provided that the following criteria are met:-

- i) The siting and appearance of the proposed apparatus and associated structures should seek to minimise the impact on the visual amenity, character and appearance of the surrounding area
- ii) If on a building, apparatus and associated structures should be sited and designed in order to seek and minimise impact to the external appearance of the host building
- iii) If proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the local planning authority
- iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of technology

The representor would also like to see the following supporting text for the policy:

Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing and tall structures.

Council Analysis

Widespread access to affordable, secure telecommunications infrastructure is important to citizens and businesses. Any policy in respect of telecommunications is likely to be concerned with the siting and appearance of apparatus, including location and landscaping requirements and the likely impact on amenity consistent with operational requirements. The Deposit Replacement LDP contains a

suite of countywide development management policies that would together with National Policy and Guidance provide adequate guidance in respect of any future planning application for telecommunication proposals.

Recommendation

No amendment be made in respect of this representation

2181.P1 SAFETY AND AIRSPACE REGULATION GROUP

Representation

The Safety & Airspace Regulation Group notes the Preferred Strategy Consultation but has requested that other than the consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about:

- Strategic Planning Documents (e.g. Local Development Framework and Core Strategy documents) other than those with direct aviation involvement (e.g. Regional Renewable Energy Plans);
 - Waste Plans;
 - Screening Options;
 - Low-rise structures, including telecommunication masts. With the exception of wind turbine developments, the CAA is unlikely to have any meaningful input related to applications associated with structures of a height of 100 feet or less that are situated away from aerodromes or other landing sites;
 - Orders affecting Rights of Way or Footpaths;
 - Sub-surface developments;
 - General planning applications not affecting CAA property.
 - Solar Photovoltaic Panels (SPV)
-

Council Analysis

The representation is noted

Recommendation

The comments be noted

5239.P1 MS. JUNE. E. MORGAN

Representation

Strategy Policy 13 – Renewable Energy: Local Areas of Search

The Representor is concerned about Strategy Policy 13 and the impact that Local Areas of Search could adversely have on residents as “there will be a general assumption in favour of development provided there is no adverse impact on areas of recognised environmental, cultural or landscape importance.”

The representor would like the impact that turbine developments could have on residents to be recognised and addressed by this policy, with residents’ wellbeing afforded the same level of consideration as part of this policy.

Council Analysis

Work undertaken into the Local Areas of Search has been superseded by the Renewable Energy Baseline Assessment and the Renewable Energy Background document that indicates that Wind Turbine applications should continue to be assessed on a case by case basis and as such it is no longer proposed to include Local Areas of Search within the Deposit Replacement LDP.

Supplementary Planning Guidance has been prepared which provides an indication of those areas where renewable energy (wind turbines) may prove to be acceptable and conversely where they would not be acceptable subject to their scale. The ‘Landscape Sensitivity and Capacity Study: Smaller Scale Wind Turbine Development also provides detailed guidance on the information required as part of a Landscape Visual Impact Assessment for planning applications.

Recommendation

The comments be noted

5239.P2 MS. JUNE. E. MORGAN

Representation

Strategy Policy 13 – Renewable Energy: Local Areas of Search / SEA / SA Scoping Report

The visual & sensory analysis of the county borough as part of Landmap process indicated the landscape value of the Ebbw Valley as being either outstanding or high, thus being of international/national importance.

A further Landmap assessment of the Manmoel area, outside of the Visually Important Local Landscape (VILL), further confirmed this. It gave the following assessments in three of the five

categories; in Visual & Sensory as High/Rare, Cultural as High to Outstanding and Historical as High to Outstanding.

The Manmoel area forms the valley top and one side of the Ebbw Valley consequently I believe that this indicates that the area should not be considered as a Local Area of Search.

Council Analysis

Work undertaken into the Local Areas of Search has been superseded by the Renewable Energy Baseline Assessment and the Renewable Energy Background document that indicates that Wind Turbine applications should still be assessed on an individual case by case basis.

Work relating to the 'Landscape Sensitivity and Capacity Study: Smaller Scale Wind Turbine Development' (due to be adopted as Supplementary Planning Guidance in January 2016) provides guidance on the information required as part of a Landscape Visual Impact Assessment for planning applications.

Strategy Policy 13 will be superseded in the Deposit Replacement LDP and will no longer include reference to local areas of search.

Recommendation

The comments be noted.

4142.P1 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

LDP Vision (Question 1)

It is considered that the Vision Statement is fit for purpose as it is positively worded and seeks to ensure that the economic, environmental and social needs of the County Borough are met over the Plan period to 2031.

The Vision as currently drafted, particularly the text in relation to the Cardiff Capital Region, is in accordance with Planning Policy Wales as well as the recent Positive Planning document published by the Welsh Government in December 2013 which sought to introduce a culture change within the planning system with the intention that it enables encourages and supports development.

Therefore, the Vision Statement is supported insofar as it is drafted as a standalone statement, but it is critical that the policies (and their implementation) are just as positive – i.e. that “the plan sets out a coherent strategy from which its policies and allocations logically flow...”, which is contained within Test of Soundness CE1, and that the policies have regard to national policy, which is set out

within Test of Soundness C2. If this is not achieved at the Deposit stage then the Plan may be unsound.

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

4142.P2 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

LDP Aims (Question 2)

The Key Aims identified generally accord with the Vision Statement above and the Welsh Government's requirement for Positive Planning. However, there is a concern that some of the Key Aims are not positively worded, which is a potential issue that has been raised above in response to Question 1.

Firstly, one of the primary reasons that the LDP is being reviewed is because the Council is not delivering its LDP housing requirement, and subsequently cannot demonstrate a 5 year housing land supply in accordance with Planning Policy Wales and TAN1. It is therefore concerning that there is not a specific Key Aim for the delivery of housing, particularly as Important Objective 6 in the Council's own Corporate Plan is to "Improve the availability of private and public sector housing to reduce the number of residents who may become homeless."

Consequently, a new Key Aim needs to be included to specifically address housing delivery, and whilst all the Key Aims carry equal weight, it is considered that a specific housing related Key Aim needs to be near the top of the list. Therefore a new Key Aim needs to be included in order to achieve the Vision Statement and Corporate Plan and to ensure that this LDP Review does not suffer the same problems in terms of housing delivery as the adopted LDP. This new Key Aim, which is based upon IO6, should read broadly as follows:

Improve the availability of private and public sector homes to offer a wide range and choice of all types of housing to meet the needs and demands of the existing and future population of the County Borough.

Secondly, Key Aim 'A' places the emphasis on protection of the environment with the need for development taking an apparently secondary position, contrary to the positive message of delivery and growth contained within the Vision Statement. It is acknowledged that environmental and economic needs often compete against each other and a balance needs to be struck to ensure suitable appropriate development. However, the current drafting of Key Aim 'A' is not sufficiently balanced, particularly when read in conjunction with the Vision Statement, Positive Planning and the

Council's own Corporate Plan. Consequently, Key Aim 'A' fails Tests of Soundness C2 (in that it does not have regard for national policy) and CE1 (in that it doesn't 'logically flow' from the strategy).

Therefore Key Aim 'A' needs to be revised to the following (which is a simple reordering of the existing draft) so that it is more in accordance with the above documents, but particularly the Vision Statement:

Meet the development needs of the County Borough whilst balancing the need to protect the environment and conserve valuable resources.

Finally, Key Aim 'O' is overly restrictive in the proposed form of development for Principal Towns and Local Centres. It is acknowledged that development is required within Principal Towns and Local Centres to enhance their vibrancy and vitality, but residential development is a crucial part of this mix therefore it should not be restricted to 'commercial and mixed-use' development.

Therefore Key Aim 'O' needs to be revised to the following (which is a simple partial strikethrough of the existing draft) so that it is more in accordance with the above documents, but particularly the Vision Statement:

Promote the Principal Towns and Local Centres as hubs of enterprise through the provision of land for new ~~commercial and mixed-use~~ development to enhance the vibrancy and vitality of these important centres.

In conclusion, Key Aims 'A' and 'O' need to be revised, and a new Key Aim, specific to housing requirements, needs to be included to meet Tests of Soundness CE1 and C2.

Council Analysis

The aims and objectives have been developed in partnership with the Local Service Board and partner organisations and are considered fit for purpose. The intention of the aims is to be a broad interpretation of the strategic vision from which a series of social, economic and environmental objectives are derived. The objectives will be at the centre of the LDP and will form the basis for future policy development. The Key Aims have been reconsidered in light of representations made through the consultation process and redrafted and reordered to remove duplication and to improve clarity.

The representor contends that Aim 'A' should be revised from 'Protect the environment as a whole whilst balancing the need for development with the need to conserve valuable resources' to 'Meet the development needs of the County Borough whilst balancing the need to protect the environment and conserve valuable resources'. As a consequence of the redrafting exercise Aim A is proposed to be redrafted as Aim N as follows:

'Balance the social and economic need for development with the need to protect the environment as a whole and conserve valuable finite resources'

Give the importance of housing to the future needs of residents it is conceded that there should be a specific aim in respect of housing. It is therefore proposed to include the following Key Aim in the Deposit Replacement LDP:

“Facilitate the development of modern, well-designed, accessible, suitable and affordable housing that meets the needs of all sections of the community through the identification of appropriate land for housing in sustainable locations”

The representor contends that ‘mixed-use’ is over restrictive as it prohibits residential development, this is not the case. Mixed-use refers to a mix of uses which could in fact incorporate an element of residential development, appropriate for a Town Centre or Local Centre location. It is not considered appropriate to amend Aim O to remove the terms ‘commercial and mixed use’.

Recommendation

To agree the proposed changes to the Aims of the plan in response to representations received.

4142.P3 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

Objectives (Question 3)

The objectives of the Preferred Strategy are not considered to be SMART (Specific, Measurable, Achievable, Realistic and Time Specific). For example, Objective 1 ‘Accommodate sustainable levels of population growth’. What constitutes a sustainable level of growth, how do you measure this objective? Due to the objectives not being ‘SMART’, they are considered to be generic like the aims of the Preferred Strategy.

All of the objectives need to be written so that they constitute ‘SMART’ Objectives.

Council Analysis

The Planning and Compulsory Purchase Act requires authorities to keep under review matters that may affect the planning and development of their area. In order to achieve this LPAs are required to produce a monitoring framework in conjunction with the Deposit Replacement LDP. There is no specific requirement for broad aims and objectives to be SMART objectives, rather that they are translated into effective policies. What is more pertinent is that policies contained within the plan can be effectively monitored by specific, measurable targets, indicators and triggers. These are contained within the monitoring framework included within the Appendices to the plan.

Recommendation

No amendment be made in respect of this representation

Representation

Level of growth (Question 4)

The representor does not agree that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate.

It is not considered to be the most desirable, realistic and robust option to base the future need for housing within the County Borough until 2031. The most desirable, realistic and robust option is Scenario L – Long Term Average Household Size Change and SE Wales Migration (10 years) which equates to 740 dwellings per annum.

The Average Household Size (AHS) is considered to be too high in Scenario M (the option promoted in the Preferred Strategy) with the AHS only being reduced to 2.21 people per household by 2031 compared to an AHS of 2.39 people per household in 2011. However under Scenario L the AHS is reduced to 2.14 people per household by 2031, which is considered to be more robust and realistic given the unprecedented recession, which has been experienced during the last 10 years despite the 2011 Census confirming that the AHS was significantly higher than originally envisaged. Paragraph 6.14.7 of BR3: Population and Housing Growth

Options Background Paper (October 2014) confirms that Option L is ruled out because the decline of the AHS is too great. The AHS decreased from 2.64 people per household in 1991 to 2.43 people per household in 2001 – a decline of 0.21 people per household in 10 years. The 2011 Census confirmed that the average household size decreased from 2.43 people per household to 2.39 people per household representing a 0.04 decrease between 2001 and 2011. The decline in household size according to Option L is 0.125 persons per household for the periods 2011 – 2021 and 2021 – 2031 and for Option M the decline is 0.09 persons per household for the periods 2011 – 2021 and 2021 – 2031. Paragraph 5.6.4 of the BR3: Population and Housing Options Background Paper confirms that there are a number of possible reasons why the AHS has not decreased as quickly in the last ten years with affordability being a key factor with house prices increasing significantly. However as identified below in Figures 1 and 2, whilst house prices rose sharply between 2001 and 2005 average prices then levelled off before falling sharply between 2008 and 2009 and then levelled off again. In this regard, Figure 3 sets out the unemployment rate in Caerphilly between 2004 and 2011, which confirms that the unemployment rate rose from July 2007 and sat at 10.6% at the end of 2011. Rising unemployment rates and job uncertainty will have impacted significantly on the AHS in Caerphilly during 2001 and 2011 as well as increasing house prices which actually fell between 2009 and 2010. During the recession younger people were worst hit in terms of unemployment and this will have been the key factor influencing their ability to purchase a house rather than house prices themselves. Therefore, during a period of economic growth and stability, which in turn creates a greater number of jobs and increased job security, younger people's ability to purchase homes will improve with 'younger' people being a key component of concealed households.

The assumption that the average household size should be reduced to 2.21 persons per household is not considered to be robust and will not deliver the Vision for Caerphilly. Scenario M is not therefore based upon a "robust and credible evidence base", and therefore fails Test of Soundness CE2. Consequently, Scenario L provides a more robust and credible evidence base and should be

adopted. Therefore under Policy SP21 provision should be made for at least 16,280 new dwellings in the County Borough between 2011 to 2031 in order to deliver 14,800 dwellings in line with Option L (Long Term Average Household Size Change and SE Wales migration (10 years) to ensure that the LDP complies with the PPW (paragraph 9.1.1) which confirms that a range and choice of housing should be provided in Wales.

Council Analysis

The representor considers that Scenario L Long Term Average Household Size Change and SE Wales Migration, as set out in the Population and Household Growth Options Background Paper, is the most desirable, realistic and robust option for growth.

It is agreed that younger people living at home for longer is a key component of concealed households and that during economic growth and stability, younger people's ability to purchase homes will increase. However, it is not agreed that unemployment and job uncertainty is the key factor as to why young people haven't moved out of the parental home, rather than high house prices and rents that many younger people are unable to afford. As stated in the Background Paper, there is a very real affordability gap between earnings and house prices/rental prices and, even in times of economic growth, this has been the case. This is a key factor in explaining why average household sizes are high.

It is considered unrealistic to assume that average household sizes would return to the long term average by 2031, whilst house prices and affordability remain such an issue, and therefore the moderate average household size change scenario (Scenario M) is considered more appropriate as is the mid-point between the figure in the 2011 projections, which shows a continuation of the short term trend of large average household sizes in Caerphilly due to concealed households, and long term trends, which are too low as they are skewed by the very low average household size in the 1990s when affordability was not such an issue in the Valleys.

As well as considering the average household size, it is also important to consider whether the dwelling requirement associated with the scenario is realistic and deliverable, given past trends. Scenario M would result in a housebuilding rate of 620 dwellings per annum, which is slightly higher than long term averages, but is achievable, whereas Scenario L would result in a housebuilding rate of 762 dwellings per annum, which is considerably higher than recent and longer term trends would indicate and therefore not considered to be deliverable consistently over the whole lifetime of the plan.

Recommendation

No amendment be made in respect of this representation

4142.P5 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

Strategy Areas (Question 6)

The representor does not agree that the three strategy areas identified in the Preferred Strategy reflect the role and function of the settlements in those areas.

With regards to the Southern Connections Corridor the development strategy does not correctly reflect the role and function of the settlements within the area. No reference is made to focusing development on brownfield and greenfield sites to enhance the social and economic functions of the area. Without such an approach within the Strategy Area, the area cannot fulfil its full potential as part of the Cardiff Capital Region.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality, Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis, which confirmed that the strategy areas remain valid.

The Preferred Strategy acknowledges the unique position of Caerphilly County Borough, at the heart of the Capital City Region and recognises both it's attractiveness and landscape setting as well as its important links to Cardiff and Newport. Brownfield land will be allocated where available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land.

Recommendation

No amendment be made to in respect of this representation

4142.P6 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land in the Mid Valleys Corridor, but supports the release of greenfield land in the Southern Connections Corridor as it will help to provide a range and choice of sites in accordance with PPW.

Council Analysis

Targeting development to a limited number of growth corridors will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. The Local Housing Market Assessment has demonstrated the need for new housing throughout the county borough and specifically in the MVC and the SCC. The Deposit Replacement LDP therefore is required to allocate new development in both the MVC and the SCC. The MVC is an attractive housing market area and there is an excellent track record of housing delivery in this area. It is appropriate therefore that new sites are allocated in the MVC as well as the SCC over the plan period.

Recommendation

No amendment be made in respect of this representation

4142.P7 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the MVC & SCC.

Caerphilly County Borough Council currently does not have a 5 year supply of housing land which was one of the key drivers which triggered the commencement of LDP Review therefore immediately available and deliverable sites need to be allocated through the LDP Review process. Strategic sites tend to have long lead in times before they start delivering significant numbers of new homes given the substantial infrastructure required to enable their delivery. We estimate 3 years as per evidence and decision of the Inspectorate in relation to the delivery of Strategic sites in land off Heath Road, Sandbach (PINS Ref ROGJO/A/14/2212992). Accordingly, the LDP must ensure that there is a supply of sites for housing identified for the short term which is readily developable land when the LDP is adopted in 2017.

In regard to infrastructure requirements, BR7: Transport Background Paper paragraph 5.11 states in relation to Maesycwmmmer that:

“One alternative for improvements to the A472 is for the creation of a new link road between the Crown Roundabout on the A472 to the north-east and the Dyffryn roundabout on the A469 to the south-west. This option would provide a bypass for Maesycwmmmer as well as encompassing around 80 hectares of land that form the Strategic Site. Whilst it is recognised that this option could have significant landscape implications, mitigation and careful design through a comprehensive masterplan will reduce the impact of the development and represents the best option to deliver both the necessary strategic highway improvements and the Strategic Site.”

Paragraph 5.12 states in relation to Ness Tar:

“Access to the Strategic Site can only be accommodated by the provision of a new road under the exiting railway line. Without this access the site is not capable of being developed.”

Paragraph 5.15 states that:

“Both of the above strategic transport improvements are dependent upon, and necessary for, the implementation of the Strategic Sites. Consequently it would be logical that these two improvements are allocated in the Preferred Strategy as Strategic Highway Improvements. However, given that neither improvement can be fully justified without the development of the corresponding Strategic Site, the allocation of these schemes should be linked to the Strategic Site allocations”.

No evidence is available to confirm that delivering the strategic sites is economically viable. In addition, no information is available to confirm that the landscape impacts associated with the Maescymmer strategic site are outweighed by the benefits of the proposed allocation. Furthermore, concentrating 2,150 dwellings at two sites which total 30% of the requirement minus existing commitments will not provide for a wide range and diversity of sites.

Council Analysis

The representor objects to a strategic site within the MVC and SCC on the basis that Caerphilly County Borough doesn't have a 5 year land supply as required by Welsh Government Guidance, Technical Advice Note 1: Joint Housing Land Availability Studies. The representor argues that due to the infrastructure required to deliver the strategic sites, they will have long lead in times and development will not be realised until a lot later during the plan period.

In making provision for housing land it is good practice to allocate more land than the housing land requirement to allow for choice and flexibility. The amount of over provision is not prescribed in national planning guidance, but it is best practice for local authorities to assume approximately 10% over-allocation. The preferred strategy identified as 10% flexibility allowance with a housing provision of 13,640 new dwellings to deliver a housing requirement of 12,400 units. It is proposed that the Deposit Replacement LDP will include a similar flexibility allowance. The sites allocated for housing are those that are considered deliverable within the lifetime of the plan, having regard for constraints and viability. The sites currently allocated in the adopted LDP have been re-assessed, and only those sites that are genuinely available and have a realistic prospect of being developed within the plan period are proposed to be carried forward into the Deposit Replacement LDP.

It is agreed that all allocations should be deliverable and financially viable. Appendix twenty of the Deposit Replacement LDP provides an indication of the likely timing and phasing of development and also how the necessary infrastructure is likely to be delivered over the plan period to support the development in question.

The Replacement Deposit LDP will contain sufficient land allocated for housing to allow for choice and flexibility. The Deposit Replacement LDP will include a housing trajectory indicating when sites will be delivered during the plan period in order to ensure a 5 year land supply.

Recommendation

No amendment be made in respect of this representation

4142.P8 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

STJ008 Tin Plate Works, Machen

In light of the lack of a 5 year housing land supply, the representor considers that there is a need for the LDP to allocate a wider range of non strategic sites that are immediately available for housing such as the Former Tin Plate Works, Machen and therefore the settlement boundary of Waterloo should be amended to include this site.

Council Analysis

Each candidate site has been subject to a rigorous and robust assessment to determine its suitability or otherwise for development. Where a site is not proposed to be included in the Deposit Replacement LDP there will be specified reasons for this position. The assessment for each of the Candidate Sites will be made available in due course.

Recommendation

No amendment be made in respect of this representation.

142.P9 MRS. ZOE. AUBREY – BARTON WILMORE

Representation

Strategy Policy 11 – Planning Obligations

Policy SP 11 makes no reference to development viability and only refers to removing obstacles to development. Policy SP11 must also make reference to development viability to accord with paragraph 3.7.1 of PPW which states:

‘It is essential that arrangements are fair to both the developer and the community’.

Viability is a key issue for any developer.

Furthermore paragraph 3.7.10 of PPW states that:

‘Acceptable development should never be refused simply because an applicant is unwilling to offer such benefits’.

Applicants may refuse to make such contributions because it renders their proposed development unviable.

Council Analysis

It is not considered necessary to amend Strategy Policy 11 to include ‘viability’. New development has the potential to increase pressure on existing community infrastructure and services and the provision of adequate infrastructure is a prerequisite to development taking place where they are necessary to make the development acceptable in planning terms. Strategy Policy 11 states that obligations must be ‘reasonably located in scale and kind to the development’. Further the reasoned justification for the policy specifies that: “Where a developer considers that the level of obligation sought may affect the viability of a development proposal to an unacceptable degree the Council will require the developer to provide sufficient evidence to support this position as part of the planning obligation negotiation process.”

Recommendation

No amendment be made in respect of this representation

5264.P1 MR. CHRIS. BRIMBLE

Representation

The representor is concerned about the significant release of greenfield land and is particularly concerned that the strategy will deliver a low density, poorly designed and unsustainable car dependent model at the expense of the natural environment.

Council Analysis

The representor expresses concern regarding the release of greenfield land. Where greenfield sites are proposed for release they are required to meet a set of stringent criteria to ensure that they meet the overall objectives for the plan, including the need to maximise the use of public transport.

Further, Strategy Policy 9 Place Making is a high level policy written to ensure that development proposals contribute to creating sustainable places by having full regard to the context of the local, natural, historic and built environment, thus promoting a high standard of design in accordance with best practice, resource efficiency and sustainable development that reflects sustainable transport

and accessibility principles. It is not considered that that the strategy encourages low density, unsustainable and poorly designed built environments.

Recommendation

No amendment be made in respect of this representation

5264.P2 MR. CHRIS. BRIMBLE

Representation

Level of growth

The representor notes that the Population and Housing Growth options background Paper 2 identifies outward migration and population growth decline as a cause for concern over the plan period, and uses this as justification for the release of additional land for housing to help sustain an increasing population. This approach is by its very nature considered unsustainable in its acceptance of perpetual population growth, as this would inevitably lead to ever more people consuming even more of the earth's finite resources. A truly sustainable plan would ideally provide for a static or very slowly declining population; akin to a managed retreat of human impacts on the natural environment without adversely affecting the quality of life of the present population.

The representor is concerned by the conclusion that low house completions in the order of 345 dwellings per year are deemed "unsustainable" as opposed to a possible "dwelling led" plan of +575 dwellings per annum based on previous house-building figures, as this conveniently serves to satisfy the business plans of volume house-builders and contradicts the widely accepted definition of sustainability

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position..

Recommendation

No amendment be made in respect of this representation

Representation

A jobs led plan

The representor considers that a jobs led plan might be a more logical position to adopt given that one of the accepted contributory factors to outward migration is what is sometimes referred to as “brain drain”, where highly qualified and skilled workers leave for better paid jobs elsewhere. The construction of additional houses without the creation of well paid meaningful occupations is unlikely to attract more highly qualified migrants needed to reverse the decline, and doesn’t necessarily help deliver a diverse local economy or working population. It would therefore be encouraging to see a more aspirational plan which seeks to promote a wider range of more highly skilled employment opportunities and reverse the trend of outward migration in the first instance.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. The Council maintains this position.

The Council considered a jobs-led population forecast scenario (see Background Paper 3b Population). This scenario was based on a realistic forecast of the likely change in jobs within the County Borough up to 2031, taking into consideration that as new and improved transport infrastructure widens employment opportunities for residents, jobs within the Cardiff Capital Region become more accessible to Caerphilly residents, particularly in Cardiff and the M4. The Council concluded that as a consequence of the jobs-led scenario, the level of population growth would be too low (345 dwellings per annum to be built over the plan period) and would therefore not be a realistic policy aspiration for housing provision to underpin the Plan.

Whilst the plan is not based on a jobs-led scenario, employment opportunities are equally as integral to the Plan as housing. The Deposit Replacement LDP will make adequate provision for employment land throughout the County Borough at a range of employment sites in order to ensure that investment in the area can take place. Furthermore in recognition of the importance of town centres and tourism for employment, the Deposit Replacement LDP will enhance employment opportunities through the allocation of appropriate land to promote commercial and tourism

development including: Commercial Development Sites, Commercial Opportunity Areas and Tourism related development and activities.

Recommendation

No amendment be made in respect of this representation

5264.P4 MR. CHRIS. BRIMBLE

Representation

Cardiff Capital City Region

The representor acknowledges that Caerphilly is part of the Capital City Region, but is keen for the emerging plan to acknowledge that whilst this increases potential demand for development in the south, the LDP recognises these pressures and identifies potential sites that maximise the existing virtues of living in close proximity to the countryside whilst also being within short travel times of the city centre, and all without being detrimental to existing residents' present quality of life.

Council Analysis

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure.

Recommendation

No amendment be made in respect of this representation

5264.P5 MR. CHRIS. BRIMBLE

Representation

Development of greenfield land

The loss of green field land in the areas and to the extent shown, will be detrimental to the essential characteristics which currently make the borough appealing (i.e. well connected to city life in Cardiff

but quiet and relaxing with many homes in close proximity to the countryside). It would therefore be encouraging to see a slightly different approach to future development by promoting modest increases in density for developments on town centre infill sites and existing brown-field land, and exhausting these options before considering the green field options.

Council Analysis

Due to two successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land. Whilst the release of greenfield land in the south of the county borough is considered necessary, it is considered that targeting development to a limited number of growth corridors will prevent the proliferation of sporadic larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

Recommendation

No amendment be made in respect of this representation

5264.P6 MR. CHRIS. BRIMBLE

Representation

Encourage higher density developments that are within walking distance of public transport nodes and local amenities

The representor is in favour of higher density development (45-50 dwellings per hectare) in the interests of sustainability and in order to protect the countryside. The representor considers that this strategy will fully accord with the stated aims and objectives of the LDP, take up less land to provide the same or a greater number of homes, reduce the need to extend the settlement boundary in certain locations, maintain continued access to the surrounding countryside and deliver accommodation better suited to those identified in the background paper as being in most need over the plan period (i.e. smaller 2-3 person households).

Council Analysis

The representor's support for high density development near to public transport nodes is noted

Recommendation

The support be noted

Representation

Caerphilly South East By-pass

The road will significantly alter the character of the area and introduce noise and pollution to a neighbourhood, which currently enjoys the amenity and tranquillity of the adjoining countryside. The expansion of north Cardiff in recent years has created a significant commuter bottleneck (and no doubt a pollution problem) along Caerphilly Road through Thornhill to Gabalfa, and this situation is likely to get worse with further planned expansion of the city to the east of Lisvane. A south eastern bypass for Caerphilly will promote significantly more north-south vehicular movements over Caerphilly Mountain (especially with additional housing in Bedwas, Trethomas and Waterloo), increase congestion in Thornhill and at best move pollution and noise problems from one neighbourhood to another. Building this new road will do little to promote alternative modes of transport and will cause irrevocable damage to the natural environment as well as having a detrimental impact on the quality of life for affected residents.

Presently it takes approximately the same time to drive from Bedwas or Llanbradach to Gabalfa regardless of whether the B4263 or A470 is used, and I would anticipate that very few trips between Llanbradach and Thornhill would deliberately go via Caerphilly town centre in any case (as the A469 is quicker). This leads to the conclusion that a significant proportion of the traffic passing through Caerphilly is either a) town centre traffic that will use the B4263 in any case or b) originates from Bedwas, Trethomas and Machen; if this is the case then it would be appropriate to consider an upgrade of the existing A468 and A469 to dual carriageways, with changed priorities at Bedwas Bridge to promote the existing bypass as a preferable route to the town centre. The same argument can then be applied to the Piccadilly gyratory and other key junctions, as area wide traffic movements would be planned with an east-west emphasis as opposed to the current north-south bias. Previous Local Plans have promoted the upgrade of the existing Caerphilly bypass as a priority, and given that a majority of existing dwellings are within easy reach of this principal route it would seem appropriate to increase capacity between Penrhos and Corbett's roundabouts before other options (e.g. improving Cefn Carnau Lane) and new bypasses become a necessity.

Council Analysis

The Caerphilly Basin does experience limited congestion, particularly along the northern bypass. Natural traffic growth (without new development) will increase levels of congestion throughout the Caerphilly Basin over time. Consequently the highway network in the Caerphilly Basin will become increasingly congested without any development taking place.

There are a number of highway schemes that could be implemented to improve the efficiency and effectiveness of the network, but this will be dependent upon funding. The main source of funding

for these schemes is the Community Infrastructure Levy, but this funding can only be raised through development. Consequently development is necessary to provide funding to alleviate existing highway issues.

The council has undertaken a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment identified that, as proposed with the first phase of the South East Bypass, traffic within the Town Centre will be reduced (so reducing congestion and emissions which will assist in improving air quality in the Air Quality Management Area (AQMA)). It also identified that there would be increased traffic levels across the northern bypass and improvements to the junctions and links would be required. These improvements have been identified in the Deposit Replacement LDP.

The assessment also considered impacts where the full South East Bypass had been provided and this realised a more general spread of traffic around the ring road, although some of the junctions do require improvement to reduce congestion levels.

In respect of the Ness Tar Site, the Deposit Replacement LDP allocates the site as a strategic site, delivering the first phase of the South East Bypass which is required as part of a suite of interventions to improve air quality in the Caerphilly AQMA. The site is particularly well located to make the best use of sustainable transport, being located adjacent to the existing rail/bus interchange and within walking distance of the town centre. Whilst the site will generate traffic that will have an impact on the highway network, this will be minimised by the potential for travel by sustainable modes. It is accepted that modal shift is only likely to form a small proportion of the overall trips at the start of the Replacement Plan period, but when the impacts of measures proposed in the Cardiff LDP are felt outside of the Cardiff City boundaries it is highly likely that significant increases in modal shift will be realised.

Overall the proposed development will increase the level of traffic on the highway network, but development is also the source of funding for the improvements necessary to minimise the impact of increased traffic. The development of the Ness tar site will also provide the first phase of the South East Bypass which will redistribute traffic from the town centre, alleviating congestion and assisting in improving air quality in the town centre.

As part of the preparatory work for the Deposit Replacement LDP the council undertook a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment considered the effects of traffic generated from all development sites proposed in the Deposit Replacement LDP.

The assessment considered the impacts of all of the proposed development and identified a series of improvements to the highway network. These improvements have been included as allocations in the Deposit plan.

In preparing the Deposit Replacement LDP the existing highway network has been carefully considered and improvements to the network have been identified. As such the road system has been considered fully.

Recommendation

No amendment be made in respect of this representation

5264.P8 MR. CHRIS. BRIMBLE

Representation

Re-establishment of Caerphilly to Nantgarw rail connection

The representor would like to see the inclusion of this route in the emerging plan as it would lend itself to the creation of a city circle-line on the new electrified metro system, and provide greater connectivity between Caerphilly and a significant additional number of stations within (west) Cardiff for a range of journeys.

Council Analysis

This proposal has not been identified within the Regional Transport Plan, Local Transport Plan, electrification of the railway lines or the METRO concept. As such it is not considered deliverable within the plan period. Notwithstanding this further investigation should be undertaken to explore the merits of the proposal in the longer term.

Recommendation

No amendment be made in respect of this representation

5264.P9 MR. CHRIS. BRIMBLE

Representation

Allocate Caerphilly Mountain and adjacent hills as a country park, in order to protect local landscape features and provide an opportunity for outdoor pursuits and associated employment opportunities.

Council Analysis

It is not considered appropriate to allocate Caerphilly Mountain as a country park. Caerphilly Mountain contains common land, which is subject to Commoner's Rights. The representor considers

that allocating this area as a country park will afford it protection from development. It is considered that Strategy Policy 13 Conservation of Natural Heritage affords valuable landscapes sufficient protection and consideration against any development proposals. Similarly Strategy Policy 18 Countryside Recreation promotes access to opportunities for enjoyment of the county borough where proposals are sustainable in terms of their impact on natural heritage.

Recommendation

No amendment be made in respect of this representation

5264.P10 MR. CHRIS. BRIMBLE

Representation

The emerging plan should promote mixed-use town centres to support and sustain retail provision.

Council Analysis

The Preferred Strategy and emerging Deposit Replacement LDP promote and facilitate an appropriate range of town centre use.

Recommendation

The comments be noted

4134.P1 NEWPORT CITY COUNCIL

Representation

Special Landscape Areas / Visually Important Landscapes

Newport City Council supports the identification of significant landscapes. The Newport LDP identifies and allocates a number of SLAs, one of which reaches Caerphilly boundary. At present, there is a continuation of landscape recognition between Newport and Caerphilly in both adopted LDPs. Any alteration to this approach would need to consider the impact that has on the SLA within Newport because it is clear that landscape does not follow political boundaries.

Council Analysis

The representation in respect of Special Landscape Areas is noted.

Recommendation

The comments be noted

4134.P2 NEWPORT CITY COUNCIL

Representation

Strategic Rail

Newport City Council support the link from the Ebbw Vale rail line directly into Newport. This connection has recently been identified in the Cardiff Capital Region Report – “Powering the Welsh Economy” Report (February 2015).

In addition, the objective for the reintroduction of the Caerphilly-Machen-Newport line to passengers is welcomed but this should not impact on the rail capacity for the sustainable transportation of aggregate along this line. The Newport LDP is clear that existing rail should be safeguarded to ensure minerals from sources such as Machen Quarry are capable of being transported sustainably.

Council Analysis

The representor supports the link from the Ebbw Vale rail line directly into Newport and the reintroduction of the Caerphilly-Machen-Newport Railway line. The representor’s comments are welcomed.

Recommendation

The support be noted

4134.P3 NEWPORT CITY COUNCIL

Representation

Gypsy & Traveller Accommodation

Paragraph 8.22 of the Preferred Strategy notes that Gypsy and Traveller Accommodation should be a consideration at the regional scale. In the case of a transit site, this appears to have some merit but has not been the position taken by Welsh Government/Planning Inspectorate at the Newport LDP examination or the Cardiff LDP examination, in which the Inspector has requested to understand the transit need for the individual authority. In terms of permanent accommodation, this is a need that is area specific and should be met as such.

Council Analysis

Part 3 of the Housing (Wales) Act 2014 requires local authorities in Wales to undertake a Gypsy and Traveller accommodation assessment (GTAA) and, where an unmet need is identified, make provision for residential site pitches.

The Council has carried out a GTAA in accordance with statutory guidance issued by Welsh Government. As part of the assessment process the council has spoken to as many members of the Gypsy Traveller community living in the county borough as possible. The completed GTAA will be submitted to Welsh Government for approval in February 2016 and has been used to inform the Gypsy & Traveller Policy in the Deposit Replacement LDP.

Notwithstanding the GTAA, the council is required by Welsh Government to undertake a separate assessment for Gypsies and Travellers due to the very low number living in the borough. This has been undertaken as part of the Local Housing Market Assessment April 2015. A completed assessment of housing needs, of the settled community is contained within this document.

Recommendation

The comments be noted

4134.P4 NEWPORT CITY COUNCIL

Representation

Strategy Policy 1 Development in the Heads of the Valleys Regeneration Area

Newport City Council consider that it is unclear how developers can achieve criterion A and C of Policy SP1.

Council Analysis

The representor considers that it is unclear as to how developers can achieve criterion A & C. Criterion A states: Promote the north of the County Borough as a good quality residential, employment and tourist area at the heart of the Valleys Regional Park, Criterion C states: Provide appropriate forms of growth in response to the specific role and function of individual settlements. The strategy policies are the vehicle for delivering the overarching strategy over the plan period and deliver the aims and objectives of the plan. It is considered appropriate to promote the north of the county borough to encourage developers further north, similarly it is considered appropriate to target appropriate forms of growth in response to the specific role and function of individual settlements. Whilst the north of the county borough is considered less attractive to developers, it is equally important to ensure that where development is permitted it is well designed and contributes to the role and function of the particular settlement in which is located. There is also a need to diversify the housing stock within this area and encourage employment opportunities to sustain the existing population.

Recommendation

No amendment be made to in respect of this representation

4134.P5 NEWPORT CITY COUNCIL

Representation

Strategy Policy SP4 Settlement Boundaries & Strategy Policy SP5 Local Identity

Newport City Council consider that these policies overlap and therefore duplicate policy focus.

Council Analysis

It is not considered that Strategy Policies SP4 Settlement Boundaries and Strategy Policy SP5 (Green Wedges) Local Identity overlap as each perform a different function. Settlement boundaries define the area within which development would normally be allowed, taking into account material planning considerations whilst Green Wedges maintain the integrity and identity of individual villages where development would otherwise result in their coalescence.

Recommendation

No amendment be made in respect of this representation

4134.P6 NEWPORT CITY COUNCIL

Representation

Flood Risk

Newport City Council express concern regarding a number of sites within Risca that are deemed to meet the preferred strategy (RSW002, RSW003, RSW004, RSW005). The basis for this concern is that the location of many of the sites is within flood risk areas and if these sites were to be developed, the potential impact that this could have on Newport further downstream. This concern is recognised within the Preferred Strategy, which is welcomed, and continuation of our dialogue is critical to ensure that a solution is found that satisfies both Caerphilly and Newport's needs.

Council Analysis

The representor's concerns are noted. The Council is fully aware of the requirements of TAN 15 Development and Flood Risk and will apply a precautionary approach to allocation of land in the Deposit Replacement LDP. Further, there will be an ongoing dialogue with Newport in terms of any potential cross boundary issues and in particular an assessment of any potential impacts on Newport downstream as a consequence of any development proposals.

Recommendation

The comments be noted

3591.P1 MR. WAYNE. DAVID MP

Representation

The Representor notes that the Preferred Strategy divides the County Borough into three strategic areas – The Heads of the Valleys Regeneration Area, the Mid-Valleys Corridor and the Southern Connections Corridor and considers that this is consistent with how the Local Authority has approached the economic and social development of the borough for some time. The Representor however, has concerns about the relative emphasis which the Local Authority places on the development of each area.

In general terms, the northern part of the Borough is by far the least prosperous part of the borough. Indeed, as the Welsh Index of Multiple Deprivation and the work of Professor Stephen

Fothergill of Hallam University demonstrate, the northern part of the borough contains most of the deprived areas in the whole of Wales. The representor's concern is that by placing a disproportionately large emphasis on the development of the mid valleys (including near Nelson) and the southern parts of the borough, the differentiation between the north and the south will be accentuated and the deep-seated problems in the north will be compounded rather than addressed.

Council Analysis

The three strategy areas are appropriate and broadly reflect the Wales Spatial Plan which divided SE Wales into two spatial zones based upon their functionality. Specifically the Heads of the Valleys Regeneration Area, comprising the Upper Rhymney Valley and Upper Sirhowy Valley and the Connections Corridor, which extended to the remainder of the county borough. The preferred strategy further distinguishes the connections corridor by dividing the area into the Mid Valleys Corridor (Mid Valleys East & Mid Valleys West) and the Southern Connections Corridor (Caerphilly Basin and Lower Islwyn) where the influence of Cardiff and Newport is much more marked. The strategy areas were underpinned by a functional analysis which confirmed that the strategy areas remain valid.

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure.

The representor's concern about a large proportion of development being concentrated in the Mid Valleys Corridor and Southern Connections Corridor is noted. Whilst it would be highly desirable to encourage development further north, allocations within the Deposit Replacement LDP are required to be realistic and deliverable within the plan period. Many land use allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to market demand and associated issues of viability within this area. The preferred strategy continues to allocate sites for new development in the HOVRA, however the scale and number of new allocations within the HOVRA are proposed to align more closely with market activities and demand.

Recommendation

No amendment be made in respect of this representation

3591.P2 MR. WAYNE. DAVID MP

Representation

The representor is concerned that housing is disproportionately spread between strategy areas and is concerned that a lot of housing is targeted to Caerphilly basin, whilst north of Bargoed there are very few housing allocations, and that this will serve to widen the gap between the north and south of the county borough.

Council Analysis

The Council note the representor's concern about a large proportion of development being concentrated in the Mid Valleys Corridor and Southern Connections Corridor. Whilst it would be highly desirable to encourage development further north, allocations within the Deposit Replacement LDP are required to meet a demonstrable need and should respond to demand whilst at the same time they need to be realistic and deliverable within the plan period. Many land use allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to issues of viability and lack of demand within this area. The Replacement Deposit Plan proposes to allocate housing within the HOVRA (north of Bargoed) to allow for a choice and range of housing to diversify the stock and to reflect Markey activity and demand. The development, or otherwise, of these sites will largely be determined by viability; where developer profit is sufficient to incentivise development, the land will be brought forward for development. In reality, it is unlikely that significant development will be achieved within the HOVRA without significant public subsidy.

Recommendation

No amendment be made in respect of this representation

3591.P3 MR. WAYNE. DAVID MP

Representation

The Representor considers that whilst developers have a far greater interest in developing within the SCC due to the draw of Cardiff, this is also influencing housing associations' decision making process. If the private sector were to start investing further north, so to would housing associations. The representor considers that private developers are short sighted and should take into account initiatives to rejuvenate valleys communities.

Council Analysis

There is a proven track record of housing delivery by housing associations within the HOVRA. However the scale of this development is limited by virtue of the demand within the area. There is a

significant supply of social housing within the HOVRA to meet the demands placed on this tenure of property.

Private Sector development is largely determined by the house builders, both local and national /volume. Generally speaking the development industry will develop wherever they can make an adequate return. This is largely determined by the costs of development and the potential return that can be achieved in terms of sales prices. In areas of low value, viability constrains the delivery of much needed housing to diversify the housing stock.

Recommendation

The comments be noted and no amendment be made in respect of this representation

3591.P4 MR. WAYNE. DAVID MP

Representation

The representor considers that Caerphilly County Borough Council and other Local Authorities in the valleys ought to make strong representations to the Welsh Government, that despite the continuing adverse economic climate, there is a strong case for financial incentives to be provided to developers to ensure that the borough is able to encourage more balanced economic and social development. If this does not happen, the long-term prospects for the Upper Rhymney Valley are indeed extremely bleak. Because of well-established economic market factors it is extremely unlikely that significant economic investment will be attracted to the Upper Rhymney Valley. If this is the case, the social deprivation of this area will only be made much worse if there are relatively few new private or social houses built in the area. The implicit suggestion that little can be done to reverse the depopulation of the upper part of the Rhymney Valley is at variance with the rationale behind the South Wales Metro. This flagship project, being taken forward by the Welsh Government, seeks to connect areas like the Upper Rhymney Valley to the capital city.

Council Analysis

It is agreed that without significant public subsidy or strong financial incentives it is unlikely that significant development will be realised in the Upper Rhymney Valley due to issues of viability.

Recommendation

The comments be noted and no amendment in respect of this representation

3591.P5 MR. WAYNE. DAVID MP

Representation

The representor considers that the scale and level of housing proposed for the SCC would create 2 distinct problems for Caerphilly Basin.

Firstly much of the Caerphilly Basin is renowned for its natural beauty, the development of greenfield land and the scale of development would represent an unjustifiable encroachment into the countryside.

Secondly, the scale and level of development would have serious implications upon existing infrastructure including schools, amenities, sewage and water supplies, road infrastructure etc. The increase in car borne journeys would increase as a result of development and the construction of new roads would result in the further loss of countryside.

Council Analysis

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. Targeting development to a limited number of growth corridors will prevent the proliferation of larger sporadic development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

Concerns are raised in respect of the density and scale of development and its impact and encroachment into the countryside. Whilst the concern is noted, development of the site is required to be guided by a detailed masterplan, which will need to form part of any planning application for the site. The masterplan will clearly set out the vision and objectives for the site and is required to have full regard to the context of the site and the local, natural, historic and built environment and its special features. A comprehensive landscaping strategy will also be required as part of any future development proposal for the site to provide appropriate mitigation.

In terms of infrastructure, a strategic level assessment was undertaken to assess capacity and identify where infrastructure is required to accommodate further development and the extent to which development can provide or compensate for the necessary social and physical infrastructure. This is contained in the Infrastructure Assessment Plan.

Recommendation

The comments be noted and no amendment be made in respect of this representation

5167.P1 DR. C. W. SMITH

Representation

LDP Vision (Question 1)

The LDP Vision statement is fit for purpose

Council Analysis

The support for the LDP Vision Statement is welcomed.

Recommendation

The support be noted

5167.P2 DR. C. W. SMITH

Representation

Aims (Question 2)

The representor does not consider that the aims are appropriate and considers that:

Aim E is not a matter that the council should be addressing.

Aim F is inappropriate as the council cannot ensure equal opportunities outside the administrative boundary of the county borough.

Aim G Cycling should not be included within an integrated and sustainable transport system as cycling is not a viable and safe option.

Aim J should be qualified to explain that the best use of resources is not necessarily the best value for money.

Council Analysis

The LDP aims have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose.

Aims should provide an overall view of the future direction of the local authority from which LDP objectives can be developed. Aim E is in accordance with this.

The representor considers that aim F is inappropriate, aim F states:

“Ensure equal opportunities for all to proposed and existing facilities and services within and outside the County Borough”.

The representor considers that the aim should not make reference to ‘outside the county borough’ as it is outside the administrative boundary of Caerphilly Council. This view is not upheld as it is important to note that this authority does not exist in isolation and that many residents access services and employment opportunities outside the county borough. Therefore promoting equal opportunities to all could mean providing improved public transport facilities to make places more accessible etc..

The representor wishes to exclude cycling due to safety concerns, however cycling forms an integral part of an integrated and sustainable transport system

It is not considered appropriate to amend Aim J to qualify that ‘the best uses of resources is not necessarily the best value for money’, planning by its very nature seeks to order and regulate land use in an efficient and ethical way in the public interest.

Recommendation

No amendment be made in respect of this representation

5167.P3 DR. C. W. SMITH

Representation

Objectives (Question 3)

The representor does not consider that the objectives are appropriate for the following reasons:

- Objective 5 – Renewable energy should be clarified to exclude wind energy as it is inefficient, expensive and visually impacts upon landscape
- Objective 6 – The waste management objective should make reference to toxic waste and should ensure that it is dealt with appropriately so that it does not become a problem for future generations
- Objective 7 – This objective should make reference to specific sites that require reclamation such as Bedwas Colliery
- Objective 9 – This objective should be qualified as meeting the housing needs of the population should not mean providing housing to meet the demand from Cardiff.

- Objective 12 – ‘enhancing’ sites of nature conservation is unclear
 - Objective 16 – infrastructure requirements should be as a result of a demonstrable need
 - Objective 18 – this objective should include reference to the take-up of existing empty premises on existing employment sites and business parks.
-

Council Analysis

The LDP objectives have been developed in partnership with the Local Service Board and partner organisations and they are fit for purpose.

It is not appropriate to amend Objective 5 to omit wind energy, as wind energy is a renewable energy source that should be considered.

Objective 6 is an overarching objective that relates to the waste hierarchy, it is not considered appropriate to include toxic waste specifically as part of this objective, as toxic waste is one of a number of waste streams.

Objective 7 should not be amended to include specific sites, it is an overarching plan objective that refers to a number of brownfield sites and is not specific to Bedwas Colliery.

It is not considered that Objective 12 is unclear, the term ‘enhancing’ is not ambiguous

Objective 16 should not be amended, the aim refers to making the most of existing infrastructure, the representor refers to new infrastructure and that there should be a ‘demonstrable need’ for new infrastructure. The focus of this objective is to promote public transport and make efficient use of existing infrastructure and is not intended to address new infrastructure provision.

Recommendation

No amendment be made in respect of this representation

5167.P4 DR. C. W. SMITH

Representation

Level of growth (Question 4)

The representor does not agree that a moderate level of population and housing growth leading to the need for an additional 620 dwellings a year is appropriate. The representor believes that this is an overestimation of housing need.

Council Analysis

In determining the appropriate level of growth for the county borough, the Council considered a number of population and household growth scenarios, employment growth and alternative spatial options that arise from the consideration of both. Having regard to the functional analysis undertaken as part of the review, identification of key trends and existing and emerging evidence, consideration of alternative population and growth scenarios, feedback from partner organisations and key stakeholders and consideration of the cumulative impact on development, the Council decided that the moderate growth scenario was the most appropriate level of growth for the county borough. No evidence has been submitted to challenge this position.

Recommendation

No amendment be made in respect of this representation

5167.P5 DR. C. W. SMITH

Representation

Release of greenfield land in MVC & SCC (Question 7)

The representor does not agree with the release of greenfield land and believes that all brownfield land should be developed in the first instance.

Council Analysis

Whilst the representor expresses concern regarding the release of greenfield land, the Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Greenfield land will need to be released for development in addition to brownfield land, however the Council is seeking to allocate greenfield land that will have the least impact on the environment, preserving environmentally sensitive areas.

The Council will continue to allocate brownfield land where it is suitable and available. However due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land in addition. Whilst the Council is able to allocate brownfield land for development, the Council is not able to incentivise developers to develop brownfield land. The development of brownfield land is largely down to issues of viability, where developer profit is sufficient, the land will be brought forward for development.

Recommendation

No amendment be made in respect of this representation

5167.P6 DR. C. W. SMITH

Representation

Strategic Sites (Question 8)

The representor does not agree with the proposal for a strategic site in the SCC. The strategic site within the SCC will spoil the setting of Caerphilly Castle and will result in the unacceptable loss of countryside. Furthermore the representor considers that this site will cater for the needs of Cardiff at Caerphilly's expense.

Council Analysis

The strategic site at South East Caerphilly (Former Ness Tar Plant and adjoining land) is a mixed use town centre scheme of approximately 685 homes, 3 hectares of employment land and formal leisure provision, focused on the Caerphilly Transport Interchange and accessed by a new link road. The allocation of this site would not detrimentally alter the character and setting of Caerphilly Town, however it will inevitably alter the setting of the properties immediately adjacent to the site. The planned expansion to the east is considered to target development to that part of the town that is well served by public transport and co-locates new homes with jobs, services and facilities, adding to the vitality and vibrancy of the town.

The allocation of the strategic site in this location is considered to be a potential catalyst to enhance the character and setting of Caerphilly Town, as Caerphilly has the potential to be the area of choice for investment after Cardiff through the City Deal and Metro Initiative. The redevelopment of the Former Ness Tar Plant, in such a strategic location, is considered to present an opportunity to remediate a prominent contaminated site and deliver infrastructure provision that will benefit both the site and the wider area.

It is not considered that the development of the site will result in the unacceptable loss of countryside, it is considered that by targeting development to a limited number of growth corridors, this will prevent the proliferation of larger sporadic development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

The Deposit Replacement LDP will cater for the needs of Caerphilly County Borough whilst acknowledging Caerphilly's position at 'the heart of Cardiff Capital Region'. This is merely a locational reference as to where Caerphilly Borough lies within this region and does not imply that Caerphilly Borough is accommodating Cardiff's needs.

Recommendation

No amendment be made in respect of this representation

5268.P1 MR. GARETH. JONES

Representation

SEA /SA Document 1, Page 29, Paragraph A6

Concern is expressed regarding the air quality within Caerphilly Town Centre. The representor outlines measures for future consideration that could potentially improve air quality including incentives to use the by-passes, speed controls within the town centre, forcing people to turn engines off at traffic lights, congestion charging, and in the longer term particulate filters and electric cars.

Council Analysis

The representation is noted. An Air Quality Action Plan will be produced by Environmental Health Pollution Control for Caerphilly Air Quality Management Area.

Recommendation

No amendment be made to the Preferred Strategy in respect of this representation

5268.P2 MR. GARETH. JONES

Representation

The representor considers that there is a lot of emphasis on additional housing but not on additional employment. Employment opportunities need to be better serviced by modes of public transport as it is more sustainable and the cost of running a car is often prohibitive.

Council Analysis

Employment opportunities are equally as integral to the Preferred Strategy as housing. This is reflected by Key aim H:

“Increase the economic prosperity of the people and communities of the county borough through the provision of land for employment opportunities, supported by appropriate housing, ancillary facilities and services (including community and health facilities, recreation, leisure etc).”

It is further reflected by Key Objectives 16, 17 & 18 and Strategy Policy 23 – Managing Employment Growth. Strategy Policy 23 states:

“The Council has made provision for the development of 55 Ha of employment land in the county borough up to 2031 to meet the identified need for 29 Ha. This over allocation is to allow for flexibility and choice. The requirement will be met principally through the development of a diverse range of employment sites located on Business Parks and Industrial Estates.

Recommendation

No amendment be made in respect of this representation

ANNEX 2 – REPRESENTATIONS ON THE SEA/SA

Summary: In total 3 representors responded in respect of the SEA / SA Documents. Of those, 1 representor was in support and 2 representors made general comments.

In total 1 representation was made in support:

Representor:	1599 Mr Martin Rickard		
Chapter:	6	Para/Ref:	2.26 – 2.43

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

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.

Recommendation

No amendment be made in respect of this representation.

In total 2 representations were made in comment:

Comment			
Representor	Name	Representor	Name
5268	Mr Gareth Jones	5185	Mr Andrew Kibble

Representor:	5268 Mr Gareth Jones		
Chapter:	6	Para/Ref:	Page 29

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 is hazardous to pedestrians in the rush hour. Incentives to use the by-pass, 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.

Council Response

The LDP addresses land use issues within the county borough. A number of 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.

Recommendation

No amendment be made in respect of this representation.

Representor: Mr Andrew Kibble

Chapter: 6 **Para/Ref:** Page 29

Summary Of Comment

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

Representation

The SEA 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 sided 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 a 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 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 development of the Bypass will have beneficial impacts in respect of air quality in the town centre.

Recommendation

No amendment be made in respect of this representation.

ANNEX 3 – REPRESENTATIONS ON STRATEGIC SITES**(A) PARC GWERNAU MAESYCWMMER STRATEGIC SITE**

Summary: In total 47 representors responded in respect of this strategic site. Of those, 5 representors were in support, 29 raised objection and 13 made general comment.

In total 427 representations were made.

Support			
Representor	Name	Representor	Name
4991	Mr Ian Fussell	5183	Mr G Thomas
5039	Mrs Marj Edwards	5253	c/o Asbri Planning Ltd
401	Mrs Ceri Mortimer		

Summary of key issues in support:

- Will deliver high quality and appropriately located homes, close to jobs and services supported by modern, integrated transport provision;
- Facilitate the development of modern, well designed, accessible and affordable housing that meets the needs of all sections of the community through the identification of appropriate land for housing in sustainable locations;
- The Preferred Strategy Objectives are appropriate, and the development meets the objectives of the plan;
- The development of the site would reinforce the role of the key settlements of Ystrad Mynach and Blackwood, whilst improving the A472 transport corridor, the main east-west highway along the southern edge of the Mid Valleys Corridor;
- There is a need for a by-pass in Maesycwmmmer, which is preferable to onsite improvements to the current A472. With the additional dwellings and vehicles, the by-pass will give additional access to villagers as well as relief to the current A472;
- It is essential that new developments are located close to local amenities as this will help promote sustainable development i.e. excellent road / rail links and public services;
- The site will provide the proposed road link, the necessary education and community facilities, address site constraints such as shallow mine workings, and allow for the retention and enhancement of key landscape and ecological features. A larger quantum of housing than the 1,700 suggested will assist in the delivery of the necessary road infrastructure improvements (suggest 2,500);
- The development would provide affordable housing as well as improve the road infrastructure and alleviate the existing bottleneck.

Object			
Representor	Name	Representor	Name
5100	Ms Jill Rossiter	5187	Mrs Amanda Olsen

5095	Miss Linda James	5144	Mr Stan McDonald
5292	c/o Miss Rebecca Hartley	5117	Mrs Cara Tucker
5214	Mr Malcolm Jeff	5178	Mr Richard Pask
5198	Ms Sian Harris	5147	Mrs Sally Higgs
5118	Mr Nick Olsen	5145	Mrs Sheila McDonald
5225	Mr Howard Thomas	3750	Mr Michael Spiller
2422	Mr David Cook	5109	Mr Alan Edmunds
287	Mrs Gillian Thomas	3753	Mr Ralph Wright
5295	Mr & Mrs R & S James	5298	Mr Howard Evans
5204	Mrs Mary Watkins	5221	Mr Rhys Hurley
5202	Mrs Suzanne Jovetic	5129	BG Neville
5267	Mr Kurt Lardner	5318	Miss J Pasztor
4012	Mrs Christine Hewlett	5320	Mr J Pasztor
5102	Mr T Evans		

Summary of key issues in objection:

Character / Setting

- Developing land at Maesycwmmmer will only further affect the MVC and will attract people from Caerphilly and Cardiff;
- Developments of this size should be located closer to larger existing developments or cities;
- Developing the Maesycwmmmer site could see the coalescence of Maesycwmmmer to Pontllanfraith and Ystrad Mynach;
- The settlement boundaries of Maesycwmmmer and also Cwmfelinfach, Ynysddu and Wyllie would be breached.

Identity & Community

- Objections raised as there is a unique sense of place / identity in Maesycwmmmer that will be destroyed if the site is allocated;
- It is noted that the green wedge should remain to protect the local identity of the village;
- There needs to be clarity in terms of how the new development will integrate into the existing village and how the development will improve / enhance the existing situation in the village;
- Concerns that increasing the size of the village will not enhance the vibrancy and social cohesion of the area;
- The development would change the character of Maesycwmmmer from predominantly rural to urban.

Economy

- Development, growth and employment opportunities should be targeted to the north of the county borough, to the most deprived areas, where it is most needed;
- The development will lead to the loss of valuable farmland;

- If strategic development site proceeds, additional farm land should be included to allow farmer to relocate;
- Concern is raised as there is no provision for employment within the area;
- There is also a failure to recognise that attracting employers into this area is difficult and housing in isolation will create problems.

Traffic and Transport

Maesycwmmmer Bypass

- Concerns raised over cost and effectiveness of by-pass;
- Car use should be discouraged, provision of by-pass encourages car use;
- The need for the bypass is recognised but there are environmental concerns regarding its development;
- A by-pass is needed in Maesycwmmmer, however not at the expense of additional dwellings. The by-pass could be funded through a variety of other means;
- No need for an improved road – the additional time allotted due to other ‘pinch points’ far outweigh the benefits of a by-pass;
- No need for by-pass, existing road should be improved;
- Maesycwmmmer ‘pinch point’ mentioned in the plan has been created by the Highways Department who have not listened to the concerns of the residents over years;
- The effect of any ‘relief’ of a by-pass on the A472 will be stifled with the development of all the proposed dwellings;
- Questions regarding the funding of the by-pass;
- The scale of the development is disproportionate to the required road.

Congestion

- There is already congestion within Maesycwmmmer and the surrounding area;
- The development site should not be accessed through the existing village;
- Current use of lanes provides easy access to the by-pass, development will increase the time it takes to enter/leave the village;
- The identification of Maesycwmmmer as a Strategic Site is flawed as it does not take into account the increase of traffic flow to the north and west. The traffic that does flow south will bottleneck in Caerphilly Town;
- Concern is raised in respect of the traffic implications in terms of leaving and entering the village due to increased congestion. Travel around the mid valleys to other local towns will become more congested;
- There should be no access from Wyllie village as existing infrastructure is unable to deal with additional traffic.

Public Transport

- Park and ride facilities at Llanbradach, Ystrad Mynach and Hengoed stations will not be able to cope with additional demand which development at Maescwmmmer will bring;
- Difficulty accessing and exiting the proposed Park and Ride at Ystrad Mynach;
- The proposed Park and Ride at Ystrad Mynach would take away the only school playing field in Ystrad Mynach;
- Transport infrastructure needs significant investment.

Flooding & Drainage

- Concerns regarding flooding and drainage.

Scale and Density of development

- The scale of the proposed Maescwmmmer site would be unacceptable and would overwhelm the current village and the facilities available within it;
- Development should be smaller scale and / or dispersed across the county borough;

Housing/Population

- Devaluation of existing properties;
- Concern regarding structural impact on existing properties;
- Disagree with population and housing growth.

Phasing

- Any development should only be permitted after the new road is constructed due to the likely impact on the existing network and on the village of Maescwmmmer;

Noise

- Concerns are raised concerning the potential impact of the site on residents in respect of noise and pollution.

Pollution

- Concerns raised regarding the rise of rodents and pests in the area.

Sustainability

- Concerns regarding greenhouse effect;
- Concerns regarding energy and energy efficiency;
- Additional dwellings and traffic would destroy the environment;

Community Facilities

- Concern regarding community facilities within Maescwmmmer and facilities in nearby towns and villages which are already at capacity;
- Concerns were raised regarding the funding and provision of education;

- There are already many schools within the area offering excellent education;

Natural Heritage

- Objections were raised in regards to the loss of natural habitat, biodiversity, woodland, and important landscape in the area;
- Development will result in loss of access to the countryside as open space and for recreational use;
- Objections raised as the site contains footpaths and bridal paths.

Greenfield

- Greenfield sites should be protected.

Brownfield

- Brownfield sites should be utilised.
- The site in question has a drift mine;
- Occurrences of landslips and sink holes in the area.

Other

- Viability of scheme questioned;

Comments			
Representor	Name	Representor	Name
5233	Mr Peter Davies	2076	Cllr Robin Woodyatt
5234	Mrs Debbie Davies	3744	Mr KR Powell
5106	Mr Ian Burns	4012	Mrs Christine Hewlett
5251	Mr Lewis John	4586	Natural Resources Wales
4605	Sustrans	5041	Ms Andrea Viney
3715	Mr K Godlington	5042	Sally Thomas
968	Cllr Janet Jones		

(A)PARC GWERNAU MAESYCWMMER STRATEGIC SITE

RESPONSE

In total 427 representations were made by 47 Representors responding in respect of this strategic site. Of those, 5 representors were in support, 29 representors raised an objection and 13 representors made a general comment.

An initial response to the issues raised is provided under the key issue headlines identified by representors.

The Preferred Strategy

The representations received in respect of Parc Gwernau Maesycwmmmer raised largely site-specific issues, with relatively few representations raised in response to the Preferred Strategy itself. Of the 47 representors, only 14 representors specifically raised an objection to the Vision, whilst 8 representors supported the Vision. Only 2 representors raised an objection to the Preferred Strategy Aims and only 3 representors objected to the Preferred Strategy Objectives. Only 1 representor objected to the level of growth proposed by the Preferred Strategy and there were no objections to the methodology used to determine the need for employment land.

There were no representors that objected to the strategy areas proposed by the Preferred Strategy and 1 representor was in support of the strategy areas.

Three representors disagreed with the release of greenfield land within the Mid Valleys Corridor and the Southern Connections Corridor.

Seven representors disagreed with the allocation of 2 strategic sites.

In summary, there was no overwhelming opposition to the Preferred Strategy, Vision, Aims, Objectives, Strategy Areas, level of growth proposed, the release of greenfield land or the approach targeting planned development to two strategic sites.

Representations in Support

Five representors submitted representations in support of Parc Gwernau Maesycwmmmer. The allocation of the strategic site was considered to help deliver high quality, appropriately located homes, close to jobs and services that are supported by modern integrated transport provision.

The strategic site is also considered beneficial to the wider area, reinforcing the key settlements of Ystrad Mynach and Blackwood, whilst improving the A472 transport corridor, which is the main east-west highway along the Mid Valleys Corridor. Representors in support, identified that there is a need for a Maesycwmmmer bypass which is preferable to online improvements of the A472 and that this would alleviate the existing bottleneck of traffic travelling through Maesycwmmmer. The support for the proposed strategic site is welcomed.

Representations in objection

The majority of representations received in objection to Parc Gwernau Maesycwmmmer were received in respect of to site specific issues. The Council's response to these main issues will be addressed under the sub headings below:

Character / Setting

Representors objected to the scale of development proposed for Maesycwmmmer and the affect that this would have on the character and setting of Maesycwmmmer, including the extension of settlement boundaries and the potential for coalescence with other settlements.

The emphasis of the Preferred Strategy is to balance the need for small scale organic expansion of urban settlements throughout the county borough to serve and sustain local services, and the contribution such expansion would have in respect of regeneration initiatives; with the need for larger scale expansions of mixed-use developments that are targeted to key transportation and growth corridors throughout the county borough. The strategic site at Parc Gwernau Maesycwmmmer falls within the latter.

The scale of proposals to be targeted at each strategy area has been given careful consideration based on the ability of the area to accommodate further growth having regard to existing social and physical capacity of the area, the presence of environmental constraints and the extent to which development can provide, or compensate for necessary social or physical infrastructure. Parc Gwernau Maesycwmmmer is the strategic site proposed along the A472 strategic highway corridor at Maesycwmmmer and is of sufficient size to facilitate new and improved infrastructure provision to support the proposed level of growth planned. The Mid Valleys Corridor broadly corresponds with a corridor along the line of the A472. It has attracted substantial private sector investment and has transformed in recent years, giving confidence that a strategy based on growth in the area is viable and is likely to be effective to the benefit of the whole of the county borough.

The role of the MVC has increased in importance over the past decade as the Principal Town of Ystrad Mynach has become the headquarters for a number of vital public services. Similarly the role of Blackwood as one of the County Borough's most successful Towns has improved through the provision of modern retail units and enhanced entertainment facilities which have provided an improved night time economy, increasing the appeal and attractiveness of the town within the region.

Situated between these two important Principal Towns (Ystrad Mynach to the East and the Sub Regional Principal Town of Blackwood to the West) Maesycwmmmer has the potential to support both towns in the future by co locating much needed new homes in an area of housing pressure, in close proximity to jobs, services and community and leisure facilities. The planned expansion of Maesycwmmmer is well related to the strategic transport network and its development will provide an opportunity to address the existing traffic pinch point along the A472 through the provision of a new road through the Strategic Site. In the longer term, Maesycwmmmer has the potential to become an important Local Centre within the MVC given its strategic location.

The infrastructure delivered as a result of the development of this strategic site is envisaged to address the long-standing problem of the pinch point in the main strategic east-west highway connection in the mid valleys at Maesycwmmmer. The Bypass is proposed as the most appropriate solution to the issue, redirecting traffic that goes south down the A469 from the east west traffic along the A472, reducing traffic through Maesycwmmmer, so alleviating the problem.

The Council acknowledge that Maesycwmmmer is identified as an area of significant change and with the development of Parc Gwernau Maesycwmmmer, it will be elevated in status from a Residential Village to a Local Centre and its existing character will be affected. However the strategic site will not coalesce with the existing settlements of Cwmfelinfach, Ynysddu and Wyllie, the unique sense of place and identity of these communities will be protected via the provision of a green wedge. It is acknowledged that developments of this scale are likely to attract residents to move from both

within and outside the administrative boundary of the county borough, this is considered to make a positive contribution to the MVC as it will help to sustain services and facilities.

Identity & Community

The Council acknowledge that the development of a strategic site at Parc Gwernau Maesycwmmmer is likely to change the character of Maesycwmmmer, as it will change from a predominantly residential village to a local centre in the longer term. The proposed new development will be high quality, locally distinctive, sustainable and well integrated in order to make a positive contribution to the host settlement of Maesycwmmmer. The development of a strategic site will allow for the necessary infrastructure to alleviate traffic congestion and standing traffic running through the existing village of Maesycwmmmer and will improve east- west connectivity along the A472 strategic highway. Whilst the development of a strategic site would change the character of the area, the development would be well integrated with the existing settlement of Maesycwmmmer and would provide additional facilities including a new primary school and leisure areas. The Council will seek to include a green wedge to prevent the coalescence of Maesycwmmmer and the strategic site with the settlements of Cwmfelinfach, Ynysddu & Wyllie.

Economy

The representor's consider that strategic sites should not be allocated within the MVC and SCC as development should be encouraged further north within the HOVRA. Whilst it would be highly desirable to encourage development further north, allocations within the Deposit Replacement LDP are required to be realistic and deliverable within the plan period. Many land use allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to issues of viability and lack of demand within this area. The preferred strategy therefore seeks to reduce the scale and number of new housing allocations within the HOVRA, to more closely align with market activities and demand.

The representor's contend that there should be a focus on employment opportunities as opposed to housing and that there is a lack of employment opportunities in this area as well as the north of the county borough, essentially the HOVRA. The Deposit Replacement LDP will make provision for the development of employment land throughout the county borough and this will be met principally through the development of a range and choice of employment sites and the protection of existing employment sites. A functional analysis of the County Borough identifies that there are very few settlements within the county borough that are capable of being self sufficient in terms of comprising an adequate range and mix of land uses. As a consequence most settlements enjoy a close relationship with a network of other villages and towns in order to provide the range of services that are needed to sustain them. In this regard, the Preferred Strategy is seeking to both improve connectivity with Principal Town Centres, as centres of economic activity, whilst similarly ensuring that key settlements have sufficient employment opportunities for residents. Opportunities for economic / commercial development will be identified within Principal Towns in order to exploit town centres as hubs of enterprise and in turn increase footfall within town centres. Similarly, employment sites will be allocated and protected for employment use throughout the county borough. Sufficient employment land will be allocated / protected to allow for choice and flexibility and will be targeted at and within close proximity to Principal Towns and Local Centres throughout the borough.

The strategic site is situated between the two important Principal Towns (Ystrad Mynach to the East and the Sub Regional Principal Town of Blackwood to the West) and is therefore in close proximity to jobs and services.

The representor's contend that attracting employers into the MVC is difficult, that housing in isolation will create problems and that a by-pass would lead to the loss of investment to areas outside the borough. Improved highway infrastructure and improved east-west connectivity of the A472 through Maesycwmmmer is likely to attract employers into the MVC and encourage further investment in the Principal Town Centres, rather than the contrary. Similarly, it is not considered that the strategic site is located in isolation due to its strategic location between the Principal Town Centres of Blackwood and Ystrad Mynach. There is no evidence to substantiate that improved connectivity of the east-west highway infrastructure is likely to lead to the loss of investment to areas outside of the county borough.

The development of a strategic site in this location will not lead to the loss of valuable agricultural land and is in accordance with Planning Policy Wales paragraph 4.10 which provides national planning policy guidance in respect of conserving the best and most versatile agricultural land through an Agricultural Land Classification system (ALC). It is acknowledged that it will result in the loss of some farmland on the urban fringe.

Traffic & Transport

The Preferred Strategy sets out three Strategic Network Proposals as part of the overall Development Strategy, one of these is a Maesycwmmmer Bypass. In identifying these proposals it is not the intention to increase highway capacity, individually or cumulatively. The Maesycwmmmer Bypass is a response to the long-standing problem of the pinch point in the main strategic east-west highway connection in the mid valleys at Maesycwmmmer. The Bypass is proposed as the most appropriate solution to the issue, redirecting traffic that goes south down the A469 from the east west traffic along the A472, reducing traffic through Maesycwmmmer, so alleviating congestion in this area.

The MVC experiences congestion along the A472 at Maesycwmmmer. Natural traffic growth (without new development) will increase levels of congestion over time. Consequently the highway network will become increasingly congested without any development taking place. There are a number of highway schemes that could be implemented to improve the efficiency and effectiveness of the network, but this will be dependent upon funding. The main source of funding for these schemes is the Community Infrastructure Levy, which can only be raised through development. The council has undertaken a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment identified that certain strategic network proposals are required to address highway infrastructure capacity over the plan period, Maesycwmmmer Bypass was identified as one of these proposals. Representor's contend that a congested 'pinch point' is preferable to the environmental impact and the cost of a new relief road. If the highway infrastructure is not improved over the plan period, the main A472 east-west strategic highway will reach saturation point before 2031. The economic benefits and the functionality of the MVC is reliant on highway improvements. It is not considered that online improvements to the existing road network will improve highway capacity sufficiently to contend with natural traffic growth.

Representors contend that the by-pass should be funded by alternative means to housing. There is no funding mechanism or funding streams in place to deliver the proposed bypass. Consequently, development is necessary to provide the funding necessary to alleviate the existing highway issues.

Representor's raise issues in respect of congestion, site access and implications for the existing highway network, all these issues will be given full consideration by a transport impact assessment and feasibility study. Development of the site is required to be guided by a detailed masterplan, which will need to form part of any planning application for the site. The masterplan should clearly set out the vision and objectives for the site, together with a phasing plan to deliver the road in its entirety at the earliest opportunity. The masterplan will have full regard to and be guided by Supplementary Planning Guidance in order to ensure that the context of the site and the local, natural, historic and built environment and its special features are given due consideration throughout the layout and design of the site.

Representor's consider that the Park & Ride Facilities at Llanbradach, Ystrad Mynach and Hengoed are insufficient to accommodate the level of demand likely to be generated by the development. It is agreed that the Deposit Replacement LDP needs to maximise the provision of sustainable transport measures and address the issue of car borne travel. Consequently the Deposit Replacement LDP is proposing increases in Park and Ride provision at Ystrad Mynach and a significant increase at Llanbradach, whilst proposing new Park & Ride provision at new stations in Nelson and Crumlin. In addition to this the council is working together with neighbouring authorities in identifying sites for Park and Car Share on sites close to the major links to Cardiff, Newport and Rhondda Cynon Taff.

Flooding & Drainage

Concerns have been expressed in terms of flooding and drainage, the Council considers that there is no evidence to substantiate such concerns at this stage.

Scale and Density of development

The scale of the proposals to be targeted at each of the strategy areas is based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one of these being within the MVC along the A472 strategic highway corridor at Maesycwmmmer. The Council consider that by targeting development to a limited number of growth corridors this will prevent the proliferation of larger development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

Whilst it is acknowledged that the scale of the strategic site is likely to change the nature of a residential settlement to a local centre, the strategic site will provide access to services and facilities and will compliment the existing settlement of Maesycwmmmer, ensuring that the context of the site and the local, natural, historic and built environment and its special features are given due consideration throughout the layout and design of the site. Targeting a strategic site to key transportation and growth corridors has the potential to alleviate highway issues, support the

function of two nearby Principal Town Centres (Blackwood & Ystrad Mynach) and improve the functionality of the MVC as a whole, improving east – west connectivity.

Housing / Population

Representors have expressed concern that the development of a strategic site would lead to the devaluation of existing properties within Maesycwmmmer. The valuation of properties is not a planning consideration, nor something that can be addressed through a land use plan. However the development of a strategic site leading to the alleviation of traffic running through the existing centre of Maesycwmmmer can only serve to make the existing village more attractive.

It is accepted that the development of the strategic site will be subject to significant engineering works and as such representors have expressed concern with regards to the structural impact on existing properties. Appropriate measures to address these concerns will be identified, agreed and implemented in consultation with the relevant statutory consultees.

Phasing

It is considered that the strategic site should only be permitted once the relief road / bypass has been constructed. It would be preferable if highway improvements could be provided prior to development taking place, so that there are no short-term adverse impacts on the road network. However it is unrealistic to assume that approximately 1,800 houses could be developed in the short term. The strategic site is a considerable size and it will take a number of years to physically deliver on the ground. Localised improvements may be necessary to make early phases of the development acceptable in the short to medium term and these will be provided directly as part of the development.

The development of the strategic site is required to be guided by a detailed masterplan, which will need to form part of any planning application for the site. The masterplan will set out the vision and objectives for the site, together with a phasing plan which will provide for the development of the complete road at the earliest possible time.

Noise

Representors have raised concern in respect of the noise and disturbance that the development of this strategic site will cause. The construction and engineering works associated with the development will be carefully controlled through the planning application process.

Pollution

There is no evidence to substantiate representations that claim that the development of the strategic site will lead to an increase in rodents and pests in the area.

Sustainability

Issues have been raised in respect of sustainability and the development impact that the site would have on the environment. The preferred strategy has been subject to a sustainability appraisal and strategic environmental assessment. It is acknowledged that the sustainability appraisal found that the preferred strategy was not the most sustainable option. However, the overall aim of the SEA/SA process is to ensure that environmental and sustainability considerations are taken into account in

the decision making of the LDP. Consequently whilst the findings of the Strategy Assessment procedure found that another option was the most sustainable strategy, it does not necessarily mean that it is the strategy that should be adopted as the basis of the Deposit Replacement LDP, rather the findings of the assessment highlight considerations that the strategy might need to address. It is also important to note that the SEA/SA assessment does not take into consideration issues such as viability and deliverability, which are key in terms of delivering a sound plan.

Community Facilities

The Council has given due consideration to the increased population and household numbers that the strategic sites are likely to generate, including the impact that such development is likely to have on existing infrastructure. Where the need for additional infrastructure to support such development has been identified land is allocated accordingly in the plan.

Natural Heritage

Objections have been raised in respect of the loss of natural habitat, biodiversity and woodland. The new development will be the subject of a detailed masterplan, which will seek to retain, protect and where possible enhance the natural heritage features that are found on the site. In this context the development will need to incorporate existing features including sites of importance for nature conservation, hedgerows, trees and woodland and will be subject of a detailed landscape strategy to ensure that valuable wildlife corridors are protected and established throughout the site.

Concern is expressed that development will result in the loss of open space for recreational use in the countryside, whilst a large proportion of the site will be developed for housing. The Council will ensure that adequate associated community and leisure uses are allocated as part of the development, and will further ensure that existing facilities are retained and enhanced. Further the development will be required to incorporate a network of new public open space to provide leisure opportunities for both the existing residents of Maesycwmmmer and future residents of Parc Gwernau.

Greenfield Land

Concern is expressed regarding the release of greenfield land in the south of the county borough and mid valleys corridor. Targeting development to a limited number of growth corridors will prevent the proliferation of larger sporadic development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas. Brownfield land will continue to be allocated where it is suitable and available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed. Therefore there is a need to release greenfield land across the whole county borough to meet the future social and economic needs of the area.

Brownfield Land

Brownfield land will continue to be allocated where it is suitable and available, however due to 2 successive and successful plan strategies, much of the brownfield land within the SCC and MVC has been developed, necessitating the release for greenfield land in addition. Whilst the Council is able to allocate brownfield land for development, the Council is not able to incentivise developers to develop brownfield land. The development of brownfield land is largely down to issues of demand, supply and in turn viability, where developer profit is sufficient, the land will be brought forward for

development. The Council is required by Welsh Government to demonstrate that all sites allocated are deliverable within the plan period, where there is uncertainty over viability due to significant site issues, the Council is unable to include the site within the housing supply calculation.

Stability

A number of representations have identified that the site has a drift mine and has had occurrences of landslips and sink holes. The development of the site will have due regard to the Ground Investigation Report and the Coal Mining Risk Assessment that is to be prepared as an integral part of the detailed design work for the site. Appropriate measures to address these concerns will be identified, agreed and implemented in consultation with the relevant statutory consultees.

SOUTH EAST CAERPHILLY (FORMER NESS TAR PLANT AND ADJOINING LAND)

Summary: In total 129 representors responded in respect of this strategic site. Of those, 5 representors were in support, 114 representors raised objection and 10 representors made general comment.

In total 1101 representations were made.

Support	
Representor	Name
4775	Walters Regeneration Ltd
4995	Mr Dennis Simmons
5048	Mrs Terinna Pesci-Griffiths
5176	Mr Stephen Watts
5194	Dr Elizabeth Jones

Summary of key issues in support:

- Delivery of a large number of modern homes in a high quality environment where there is a recognised need;
- Facilitating the provision of the route for the south east by-pass by bringing forward the necessary access routes with development;
- The reclamation of the Tar Plant is long overdue;
- By-pass is needed to alleviate current problems;
- There is a need for additional housing in the area;
- Walters is committed to the development and delivery of housing during the plan period.

Object			
Representor	Name	Representor	Name
5	Mark & Julie Addis	5155	Martin Mansfield
9	Cllr EM Aldworth	5160	A Jones
612	Cllr James Fussell	5161	Emma Fitzgerald
1100	Mrs Sally-Ann Leeder	5162	Aimee Thomas
1321	DJ Mustow	5163	Vera McCarthy & Robert Williams
1463	Nigel Powell	5174	Helen & John Kinsey
3370	Ron Davies	5175	Beth
3664	Steve Lock	5177	Jason Simms
4318	Mr Peter Vaughan	5179	Stephen Baxter
4427	Cllr Colin Elsbury	5180	anonymous
4880	Richard Williams	5181	Helen James
5000	Mr Bleddyn Williams	5182	Richard Welsby
5014	Mr Glyn Wright	5184	Larry Caley
5016	Mr Paul Craig	5185	Andrew Kibble
5040	Mrs Jeanette Coles	5189	Kevin & Louise Park
5043	Mrs Alison Rees	5190	Johanna Simic
5043	Mrs Alison Rees	5191	Mrs Wendy Wallen
5044	Shan Dawson	5193	Katherine Megan Pugh
5053	Rachel Savery	5195	Mrs Cerian Arianrhod
5054	Sara Lee	5196	Barrie Llewelyn
5055	Clive Elsbury	5197	Fiona Craig
5055	Clive Elsbury	5199	Mr Raymond Davies
5057	G Farley-Hoyland	5200	Mr Paul Walters
5058	Warren Lewis	5201	Mrs Christina Bradley
5058	Mr Warren Lewis	5205	Peter Isaac
5059	Owain Rees	5206	Mr D Latham
5060	Mr Graham Taylor	5208	Carys Parr
5063	Colin Biggs	5210	Felicity Jones
5065	Chris Dawson	5212	Andy Rouse
5066	John Owen	5213	Linda & Peter Davies
5067	Kathryn Massey	5217	Mr & Mrs Bridges
5068	Paul Massey	5218	Helen Pugh
5069	Adrienne Wood	5223	Dr Lise Fontaine
5070	Aneurin Banfield	5226	Steve & Caterina Hart
5072	Paul Kennedy	5227	Geoff & Chris Churton
5073	Norma Peters	5237	Hayley Lloyd
5074	Deb Wilmott	5241	Dr Carol Tang
5075	Adrian Stone	5242	Ms Dianne Humphries
5077	Stephen Birch	5243	Debra Evans
5079	Dr Robert Jones	5245	Anthony Rees

Object			
Representor	Name	Representor	Name
5080	Daniel Lewis & Joanne Coates	5259	Janice Pitman
5081	Alex Gray	5260	John Spencer
5085	Des Protheroe	5265	Miss Joan Henderson
5086	Gary Leigh	5271	Marc & Karen Jones
5094	Peter H Jones	5275	Glynis-Jane Duggan
5097	Mrs Karen Lock	5277	Amanda Wallen
5098	Miss Rhiannon Lock	5278	Lorna Coates
5099	Mrs Lorraine Bowring	5279	David Williams
5099	Lorraine Bowring	5281	Clare Naylor
5142	Mrs Caroline Kitson	5284	Mr Meirion Edwards
5143	Mrs Claire Richards	5293	Paolo Roberts
5149	Mr K Masters	5294	Katy Roberts
5150	Miss R Masters	5299	Mr Ian Savery
5151	Mr G Wright	5306	Wishes to remain anonymous
5152	Stewart Bale	5307	Wishes to remain anonymous
5153	Lynn Gazal	5164	Ian Gorman
5154	Mr Anthony Jones	5166	Mr Sam Gould
5269	Miss Sarah Hatton	5137	Mr Derek Taylor

Summary of key issues in objection :

Character / Setting

- Further development in Caerphilly Basin would have an adverse effect on the setting of Caerphilly;
- Caerphilly has already endured enough house building.

Identity & Community

- Caerphilly itself has a unique sense of place that will be destroyed if the site is allocated;
- Development would bring little benefit to the community;
- Further development in the south of the borough would undermine values and lifestyle of existing residents.

Tourism

- Further development would have a negative impact on the tourism potential;
- Detrimental to the historic environment;
- There is a need to regenerate Caerphilly Town Centre and to provide measures to enhance its Tourism potential;
- There is the potential for the South East of Caerphilly to be redeveloped to create a tourist destination.

Economy

- Development and growth should be targeted to the north of the county borough;

- The development will lead to the loss of valuable farmland;
- There are other run-down and dilapidated areas within the county borough that require redevelopment;
- Existing industrial buildings should be updated;
- There is a need for employment within the area.

Traffic and Transport

South East Bypass

- The South East Bypass is unnecessary and would lead to more traffic and pollution;
- The benefits of the by-pass are unclear and have not been properly modelled;
- Concern regarding the safety and location of the proposed South East Bypass;
- There are no plans or money to improve the existing infrastructure;
- Road construction would involve major earthworks, threat of landslides.

Congestion

- Concern regarding increase in volume of traffic / already traffic congestion in the area;
- Proposed development of other sites in the Caerphilly Basin (i.e Waterloo) should also be taken into account when considering transport issues;
- Congestion during Town Centre Events;

Alternative plans

- There are a number of alternative routes / plans / junction that are better suited;
- Caerphilly's road system needs reconsidering;
- Traffic problems will only be solved by a tunnel going through Van Road, to Thornhill and the M4;
- No by-pass should come from Warren Drive – this area is already congested.

Public Transport

- Existing train and public transport infrastructure is insufficient to deal with current demands;
- Electrification of the railway would make Bedwas Colliery and Waterloo more sustainable;
- Re-instatement of the Caerphilly-Machen line will encourage development in the open countryside, destroying the biodiversity of the area;
- Development should occur to the west of Caerphilly, only when the Machen/Newport railway line is re-instated.

Infrastructure

- Infrastructure of Caerphilly cannot cope with any further development;
- Current drainage systems cannot cope with water and sewerage levels;
- Concern there will be flooding from mountain.

Scale and Density of development

- Development should occur in the more deprived areas of the county borough;

- Smaller sites across the whole county borough should be developed, not in large areas as Caerphilly;
- There should be restrictions on how high up the mountain development can go to protect the landscape.

Housing

- Update current housing stock before new dwellings are built. This will improve the lives of current Caerphilly residents;
- There are sufficient houses in Caerphilly already. No demand for additional ones;
- Already enough population living in Caerphilly;
- Devaluation of existing properties.

Phasing

- Housing should be built only after roads are put in to cope with the new demand.

Noise

- Concerns are raised concerning the potential impact of the site on residents in respect of noise and pollution.

Contamination

- Concern regarding groundworks on previous industrial brownfield sites
- Ness Tar plant should be left untouched so the contaminants are not disturbed

Air Quality

- Concern regarding air quality;
- The by-pass will not alleviate the problems of air pollution in Caerphilly Town Centre. However, the addition of more dwellings would exacerbate this issue further.

Public Health

- Plans have adverse impact on public health.

Community Facilities

- Pressure on Schools/ Leisure Centres/ Surgeries from further housing;
- Development would bring little benefit to the community;
- No proposed increase in police / fire services;

Allotments

- Concern expressed as to whether there would be any effect on the allotments;
- Allotments should be retained.

Natural Heritage

- Loss of habitat/nature/biodiversity/environmental damage;
- Loss of countryside for recreational use;
- Loss of countryside results in loss of health/leisure option.

Greenfield

- Object to development on greenfield land;
- Loss of views from/to Caerphilly;
- Development would take away boundary between Caerphilly and Cardiff, putting pressure on remaining green areas in the future;
- Developing on greenfield sites will make the development of Brownfield sites even more unattractive.

Brownfield

- Brownfield sites should be utilised;
- Provide incentive for developments on brownfield to occur before greenfield sites;
- Restrict development to Tar Plant;
- Free employment land for housing.

Sustainability and Climate Change

- Development on greenfield cannot be sustainable, by definition;
- The plan is not in accordance with sustainable development goals and statute, Well-being of Future Generations Act;
- The term 'balance' is subjective. The environment cannot be protected through the development of all these dwellings.

Minerals

- There are a number of historic mine workings in the southern edge of the Caerphilly basin and large scale development could disturb these workings.

General Comments	
Representor	Name
4987	Ms Katherine Prosser
4995	Mr Dennis Simmons
5055	Clive Elsbury
5082	Mrs Janet Ford
5285	Mr Philip Jones
4586	Natural Resources Wales
5203	Mrs Maxine Crowden
4815	Mrs Geraldine Roberts
5137	Mr Derek Taylor
5269	Mr Derek Taylor

SOUTH EAST CAERPHILLY (FORMER NESS TAR PLANT AND ADJOINING LAND)

RESPONSE

In total 129 representors made 1101 representations in respect of this strategic site. Of those, 5 representors were in support, 114 representors raised an objection and 10 representors provided a general comment.

The Council, in response to the issues raised, will respond under the key issues identified by representors.

The Preferred Strategy

The representations received in respect of South East Caerphilly raised largely site-specific issues, by comparison a smaller number of representations were received in response to the Preferred Strategy. The components of the Preferred Strategy that received the greatest number of objections were: the release of greenfield land within the Southern Connections Corridor; and the allocation of a strategic site in South East Caerphilly.

To summarise the representations raised in response to the Preferred Strategy itself, of the 129 representors, only 20 representors specifically raised an objection to the Vision, whilst 9 representors supported the Vision. Only 15 representors raised an objection to the Preferred Strategy Aims, whilst 13 representors supported the aims. 18 representors objected to the Preferred Strategy Objectives, whilst 8 representors were in support of the objectives. Only 19 representors objected to the level of growth proposed by the Preferred Strategy, whilst 7 representors supported the level of growth.

18 representors objected to the methodology used to determine the need for employment land, whilst 7 representors agreed with this approach. .

Only 14 representors objected to the strategy areas proposed by the Preferred Strategy and 13 representors were in support of the strategy areas.

78 representors disagreed with the release of greenfield land within the Mid Valleys Corridor and the Southern Connections Corridor, whilst 5 representors supported it.

116 representors disagreed with the approach to allocating 2 strategic sites.

In summary, there was no overwhelming opposition to the Preferred Strategy, Vision, Aims, Objectives, Strategy Areas and the level of growth proposed, however there was opposition to the release of greenfield land and the approach of allocating two strategic sites.

Representations in objection

The majority of representations received in objection to South East Caerphilly were received in objection to site -specific issues. The response to these main issues will be addressed under the sub headings below:

Character / Setting

A number of representations set out concerns that further development in the Southern Connections Corridor would have an adverse impact on the character and setting of Caerphilly and that the area had experienced enough development in recent years.

The strategic site at South East Caerphilly (Former Ness Tar Plant and adjoining land) is a mixed use town centre scheme of approximately 685 homes, 3 hectares of employment land and formal leisure provision, focused on the Caerphilly Transport Interchange and accessed by a new link road. The allocation of this site would not detrimentally alter the character and setting of Caerphilly Town, however it will inevitably alter the setting of the properties immediately adjacent to the site. The planned expansion to the east is considered to target development to that part of the town that is well served by public transport and co-locates new homes with jobs, services and facilities, adding to the vitality and vibrancy of the town.

The allocation of the strategic site in this location is considered to be a potential catalyst to enhance the character and setting of Caerphilly Town, as Caerphilly has the potential to be the area of choice for investment after Cardiff through the City Deal and Metro Initiative. The redevelopment of the Former Ness Tar Plant, in such a strategic location, is considered to present an opportunity to remediate a prominent contaminated site and deliver infrastructure provision that will benefit both the site and the wider area.

Identity & Community

A number of representations identify that Caerphilly has a unique sense of place that will be destroyed if the strategic site is allocated. The preferred strategy identifies the unique qualities of Caerphilly Town and seeks to enhance this role as a sub regional centre and as a tourist destination and the allocation of the strategic site will contribute to the vibrancy and vitality of Caerphilly Town.

Similarly, a number of representors considered that the strategic site would bring little benefit to the community nor enhance the quality of life for residents living near the proposed site. As part of the Cardiff Capital Region, Caerphilly has the potential to be the area of choice for investment after Cardiff through the City Deal and Metro Initiative and this is an extremely important economic advantage that the Deposit Replacement LDP will seek to exploit. The strategic site itself will be allocated for mixed use and will provide infrastructure that will not only benefit the strategic site but the existing community of the SCC, these benefits will include employment, leisure and importantly Phase 1 of the South East Bypass.

Tourism

The strategic site is considered to have a negative impact on tourism and the historic environment of Caerphilly and many representors consider that the strategic site at South East Caerphilly should be developed for tourism use. The strategic site will not have a negative impact on tourism, in fact it is considered that the development of the site will enhance the approach to the town, particularly by train, through the remediation of a significant brownfield site adjacent to Caerphilly Station and will improve the environment of the area, which will, in turn, impact positively on the image of the town and thus on tourism.

The strategic site has been allocated for mixed use development, consisting of employment, housing and leisure. This mix of uses best compliments the role and function of Caerphilly and co-locates new homes with jobs, services and facilities. Mixed use development is also more viable in this location and is able to deliver the necessary infrastructure to support development, including the first phase of a South East Bypass.

Economy

A number of representations consider that strategic sites should not be allocated within the MVC and SCC as development should be encouraged further north within the HOVRA. Whilst it would be highly desirable to encourage development further north, allocations within the Deposit Replacement LDP are required to meet an identified need, and also be realistic and deliverable within the plan period. Many allocations within the HOVRA have been allocated in successive development plans but have failed to be realised, this is due to the lack of demand within the area, which in turn impacts on viability and deliverability of sites. The preferred strategy therefore proposes to reduce the scale and number of new housing allocations within the HOVRA, to more closely align with market activities and demand.

It is also contended that the Council should focus on the redevelopment of run-down areas within the County Borough, existing industrial buildings and area renewal as opposed to allocating strategic sites. The Council, as part of the preparatory work for the Preferred Strategy, looked at a number of development scenarios and the availability of land to deliver new development for all uses. Where it is considered appropriate the Council will continue to allocate brownfield sites for development. In addition commercial opportunity areas are identified within town centres to encourage the regeneration of key brownfield sites for new development.

It is important to recognise that over the last two decades, Caerphilly County Borough Council has adopted two successive and successful plan strategies that consolidated development in the SCC to brownfield sites. As a consequence the availability of brownfield land within the SCC to meet the social and economic needs of residents is limited. The redevelopment of this Ness Tar Site and the adjacent land will: serve as a catalyst for future investment in Caerphilly Town Centre as a Sub Regional Centre; increase footfall; and enhance the vitality and viability of the Town, thus boosting the economy of the area.

Representors identify that there is a need for employment in the area and the strategic will in part meet this need as it is allocated for mixed use, which includes employment use.

Traffic & Transport

Concern regarding increase in volume of traffic / already traffic congestion in the area

The Caerphilly Basin does experience limited congestion, particularly along the northern bypass. Natural traffic growth (without new development) will increase levels of congestion throughout the Caerphilly Basin over time. Consequently the highway network in the Caerphilly Basin will become increasingly congested without any development taking place.

There are a number of highway schemes that could be implemented to improve the efficiency and effectiveness of the network, but this will be dependent upon funding. The main source of funding for these schemes is the Community Infrastructure Levy, but this funding can only be raised through development. Consequently development is necessary to provide funding to alleviate existing highway issues.

The council has undertaken a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment identified that, as proposed with the first phase of the South East Bypass, traffic within the Town Centre will be reduced (so reducing congestion and emissions, which will assist in improving air quality in the Air Quality Management Area (AQMA)). It also identified that there would be increased traffic levels across the northern bypass and improvements to the junctions and links would be required. These improvements have been identified in the Deposit Replacement LDP.

The assessment also considered impacts where the full South East Bypass had been provided and this realised a more general spread of traffic around the ring road, although some of the junctions do require improvement to reduce congestion levels.

In respect of the Ness Tar Site, the Deposit Replacement LDP allocates the site as a strategic site, delivering the first phase of the South East Bypass which is required as part of a suite of interventions to improve air quality in the Caerphilly AQMA. The site is particularly well located to make the best use of sustainable transport, being located adjacent to the existing rail/bus interchange and within walking distance of the town centre. Whilst the site will generate traffic that will have an impact on the highway network, this will be reduced by the potential for travel by sustainable modes. It is accepted that modal shift is only likely to form a small proportion of the overall trips at the start of the Replacement Plan period, but when the impacts of measures proposed in the Cardiff LDP are felt outside of the Cardiff City boundaries it is highly likely that significant increases in modal shift will be realised.

Overall the proposed development will increase the level of traffic on the highway network, but development is also the source of funding for the improvements necessary to minimise the impact of increased traffic. The development of the Ness tar site will provide the first phase of the South East Bypass which will redistribute traffic from the town centre, alleviating congestion and assisting in improving air quality in the town centre.

Congestion during Town Centre Events

The events that take place in Caerphilly town throughout the year are outside the remit of the Replacement LDP and as such the LDP has no influence over them.

Proposed development of other sites in the Caerphilly Basin (i.e. Waterloo) should also be taken into account when considering transport issues

As part of the preparatory work for the Deposit Replacement LDP the council undertook a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment considered the effects of traffic generated from all development sites proposed in the Deposit Replacement LDP. This included the Waterloo site, as well as Bedwas Colliery.

The assessment considered the impacts of all of the proposed development and identified a series of improvements to the highway network. These improvements have been included as allocations in the Deposit plan.

In preparing the Deposit Replacement LDP, all sites have been taken into account when considering transport issues.

Caerphilly's road system needs reconsidering

As part of the preparatory work for the Deposit Replacement LDP the council undertook a strategic level assessment of the impact the traffic generated by the proposed development in the LDP will have on the network. This assessment considered the effects of traffic generated from all development sites proposed in the Deposit Replacement LDP.

The assessment considered the impacts of all of the proposed development and identified a series of improvements to the highway network. These improvements have been included as allocations in the Deposit plan.

In preparing the Deposit Replacement LDP the existing highway network has been carefully considered and improvements to the network have been identified. As such the road system has been considered fully.

Housing should be built only after roads are put in to cope with the new demand.

It would be preferable if highway improvements could be provided prior to development taking place, so that there are no short term adverse impacts on the road network. Whilst localised improvements, necessary to make development proposals acceptable, would be provided directly as part of the development, wider strategic improvements are reliant upon when funding can be made available. The principle source of funding for road improvements will be the council's Capital Budget, Welsh Government (as appropriate) the Private Sector and the Community Infrastructure Levy (CIL).

Where infrastructure improvements are required to enable a development to proceed they will be undertaken as an integral part of the development scheme. Strategic improvement schemes will be progressed at the earliest opportunity, subject to the availability of funding, and will be prioritised to increase the capacity of the network.

There are no plans or money to improve the existing infrastructure.

The Deposit Replacement LDP identifies the necessary improvements to infrastructure that are required as a result of the developments proposed within the plan e.g highway improvements, education and leisure provision etc. Where infrastructure is the responsibility of other bodies this is indicated, and developers are advised to liaise directly with the relevant bodies to make adequate infrastructure provision and further the costs associated with that provision is borne by either the responsible body or by the developer.

The South East Bypass is unnecessary and would lead to more traffic and pollution.

It has always been a council aspiration to complete the ring road around Caerphilly by implementing the South East Bypass (SE Bypass) and thus provide an alternative route for through traffic that did not involve increasing congestion within the town centre. However the business case for the provision of the bypass was not sufficiently positive for it to receive funding and be implemented.

In 2010 the Caerphilly Town Centre Air Quality Management Area (AQMA) was designated due to the fact that air quality levels were below the required standards. In November 2014 the Welsh Government approved the Air Quality Action Plan (Action Plan) prepared by the council to address air quality issues in the Caerphilly AQMA. The Action Plan sets out a suite of measures that will cumulatively improve air quality in the town centre. The Action Plan identifies the provision of the SE Bypass as one of its measures to assist in improving air quality. Modelling work, undertaken as part of the background work for the Action Plan, identified that the provision of the SE Bypass would reduce traffic in the town centre leading to a reduction in emissions. This is further supported by the findings of the strategic traffic impact assessment that the council has undertaken in support of the Deposit Replacement LDP. This assessment identified that the provision of the SE Bypass, either just the first phase or the complete bypass, would reduce traffic levels in the town centre. Consequently the primary driver for the SE Bypass is improving air quality in the Caerphilly AQMA, by redistributing existing traffic around the edge of the town rather than through the town centre.

Concern regarding the safety and location of the proposed South East Bypass

At the current time the SE Bypass is a proposal in the development plan and no details of its alignment or location have been agreed. As such it is not possible to comment on issues in respect of safety or location. Such detail will form part of the detailed design work associated with bringing the road forward as part of the overall development.

Road construction would involve major earthworks, threat of landslides

Due to the topography of the land it will be necessary to undertake cut and fill works to accommodate the SE Bypass. It is accepted that the cut and fill works will have an impact on the landscape generally. However, the benefits of the provision of the Bypass are considered to outweigh this impact. As an integral part of the detailed design process, care will be taken to reduce the impact of the works as far as possible through mitigating measures. With regard to the potential for landslides to occur, the detailed design of the scheme will ensure that any necessary structural work is designed to ensure that this cannot happen.

There are a number of alternative routes that are better suited

At the current time the SE Bypass is a proposal in the development plan and the details of its precise alignment have not been agreed. It is not possible therefore to make the assertion that any number of alternatives is better.

The western by-pass, linking to A470 should be developed further instead of the South East Bypass

Whilst the Preferred Strategy does not identify any improvements to the northern bypass to the A470 due to its strategic focus, the Deposit Replacement LDP will identify a number of improvements to this highway corridor as part of its transport strategy. These improvements will address the impacts of development traffic on the highway network.

However, addressing the traffic issues on the northern bypass does not address the reasons that the SE bypass is being proposed. The SE Bypass is required as an essential part of the measures to improve air quality in the town centre as set out in the Air Quality Action Plan (Action Plan) for the Caerphilly Air Quality Management Area (AQMA). Modelling work, undertaken as part of the background work for the Action Plan, identified that the provision of the SE Bypass would reduce traffic in the town centre leading to a reduction in emissions. This is further supported by the findings of the strategic traffic impact assessment that the council has undertaken in support of the Deposit Replacement LDP. This assessment identified that the provision of the SE Bypass, either just the first phase or the complete bypass, would reduce traffic levels in the town centre.

Further to this the provision of the SE Bypass also assists in addressing the traffic issues on the northern bypass as it offers an alternative route for through traffic, which will redistribute trips more evenly in the long term around the completed ring road.

It is agreed that improvements to the northern bypass are required to address traffic impacts of development, but this does not diminish the requirement for the SE Bypass, which is required to assist in improving air quality in the town centre, or the fact that it will provide part of the improvements for the northern bypass as well.

The benefits of the by-pass are unclear and have not been properly modelled.

The SE Bypass is required as an essential part of the measures to improve air quality in the town centre as set out in the Air Quality Action Plan (Action Plan) for the Caerphilly Air Quality Management Area (AQMA). Modelling work, undertaken as part of the background work for the Action Plan, identified that the provision of the SE Bypass would reduce traffic in the town centre

leading to a reduction in emissions. This is further supported by the findings of a strategic traffic impact assessment that the council has undertaken in support of the Deposit Replacement LDP. This assessment identified that the provision of the SE Bypass, either just the first phase or the complete bypass, would reduce traffic levels in the town centre.

The strategic assessment considered the traffic impacts of development across the Caerphilly Basin and within the Mid Valleys Corridor as well. The findings of the assessment identified links and junctions that would reach or exceed congestion point by the end of the plan period and these form the basis of the proposed highway improvement allocations in the Deposit Replacement LDP.

It should be noted that the assessments are high-level strategic assessments commensurate with the level of the development plan. Detailed assessments will also be required when detailed proposals are brought forward through the planning application process.

The impacts of the SE bypass have been appropriately assessed through modelling and the conclusions of this modelling is that the SE Bypass will provide benefits in respect of air quality in the town centre and for traffic generally across the highway network.

No by-pass should come from Warren Drive – this area is already congested.

The first phase of the proposed SE Bypass will link the Caerphilly Business Park Roundabout in the north to Mountain Road in the south (the second phase linking Mountain Road to Watford Road in the south west). As a result no part of the Bypass will utilise Warren Drive.

At detailed planning stage consideration will need to be given to how the strategic site will link into the existing pattern of development to promote connectivity and accessibility. This will be considered through the detailed planning application and will be subject of consultation.

Queries how much money has been spent on an ill-conceived idea such as the by-pass

The first phase of the SE Bypass will be delivered through the development associated with the Strategic Site at Ness Tar. The background work and assessments required to inform the consideration of the development proposals will be undertaken and funded by the developers. As such the costs associated with the provision of the SE Bypass will be borne by the developers.

Alternative junction should be on the mountain making a direct link with the South Western by-pass or A469.

The SE Bypass will be provided as part of the development of the Ness Tar Strategic Site. However to do this the land required for the route of the Bypass needs to be within the ownership of the developers and the scale of development would need to be sufficient to make the provision of the bypass viable. The landowners have submitted information to demonstrate that the development of the site, and the bypass, is feasible and viable.

To widen the scope of the Bypass would require additional land not in control of the landowners and would require a significantly larger development site to enable the provision of the bypass.

It is considered that the proposed site and bypass represent the best option for delivery of the strategic site.

Traffic problems will only be solved by a tunnel going through Van Road, to Thornhill and the M4

The SE Bypass will need to go under the railway line via a tunnel in order to access the Ness tar site and link to Mountain Road. However it is not intended to link this road to Thornhill in Cardiff and onto the M4. This proposal has been considered previously and has been resisted by both Cardiff City and Caerphilly County Borough Councils due to its adverse impact.

It should be noted that the primary destination for traffic moving south from the Caerphilly basin is actually Cardiff, rather than the M4, so providing a link to the M4 would not address the overriding transport need, which is to facilitate transport to the city. Consequently it would be inappropriate to identify the link to the M4 as part of the proposed Bypass.

Rail

Electrification of the railway should be progressed to make Bedwas Colliery and Waterloo more sustainable.

It is agreed that electrification of the railways throughout the valleys would offer more sustainable transport options and improve travel times. However it is unlikely that the electrification of the valleys railways would make Bedwas Colliery or Waterloo more sustainable. The sites are already served by a regular rail service north and south from the Caerphilly stations and electrification of the railways would not materially affect this, as they would operate on the same basis and on the same lines.

The council's aspiration to reinstate the Caerphilly-Machen-Newport line for passenger transport would increase accessibility to the sites by sustainable modes of transport and so would have a positive impact on the sustainability of the two sites.

Development should occur to the west of Caerphilly, only once the Machen/Newport railway line.

The strategy for Caerphilly Basin in the SCC seeks to locate growth close to Caerphilly Town Centre, to maximise opportunities to co locate housing with jobs and services and close to sustainable transport. Caerphilly Town Centre is located toward the south east boundary of the town and, as such, the best location for development to meet this strategic principle is to allow planned expansion in the south east of Caerphilly.

Developing to the west of Caerphilly would locate the growth away from sustainable transport and would be close or on important highway links. This is likely to realise very little modal shift to sustainable transport and would encourage car borne trips instead. Therefore, developing on the

western side of Caerphilly would be less sustainable, in transport terms, than focussing growth to the south east.

It is a council aspiration to reinstate the Caerphilly-Machen-Newport rail line (Machen Line) for passenger transport. A feasibility study undertaken by the former regional transport group SEWTA, identified that it was feasible to bring the line back to beneficial use. The reopening of the route for passenger transport would provide a much needed east west link to Newport. However, the reinstatement of the route would not be sufficient to accommodate the traffic growth associated with the Replacement LDP on its own.

The Replacement LDP sets out a suite of policies and allocations that seek to promote modal shift to sustainable transport modes and improve the efficiency of the highway network through redistributing existing travel patterns and making selected improvements to the highway network. It is this package of measures that will deliver the transport infrastructure required to accommodate travel needs throughout the plan period and, therefore, provision of the new rail line will not, in itself, be sufficient to accommodate travel needs.

It should be noted that funding for rail improvements is vested with the Welsh Government and funding for any improvements is likely to come through the Metro project, with funding being outside the control of the county borough. Welsh Government does not currently offer funding for highway improvements and, as such, the highway improvements identified in the Replacement LDP will primarily be funded through the council's Capital Budget and developer contributions through the Community Infrastructure Levy (CIL) or s106 agreements.

Existing train and public transport infrastructure is insufficient to deal with current demands.

The council accepts that public transport infrastructure is currently insufficient to accommodate all travel needs. However, it is also the case that the majority of trips will continue to be made by car, rather than by sustainable modes, until such time as sustainable modes become more attractive than the car. There are two elements required to alter perceptions of the convenience of car travel, firstly obstacle disincentives need to be put in place to car travel, particularly at journey destinations, and secondly improvements in the frequency, reliability, accessibility and efficiency of sustainable transport modes need to be made.

The emerging Cardiff LDP sets out a series of measures designed to achieve modal shift within the city, which also act as disincentives for the car. These measures include priority bus gating at the entrances to the city, increased parking charges, reduced parking provision and reduced road space for cars, which increases journey times. Whilst these measures will have an impact of the perception of car borne travel, it will be realised in the city first with its effects only being felt by neighbouring authorities much further on in the plan period. As a result, for Caerphilly, disincentives for car travel will only start taking effect late on in the plan period.

The Replacement LDP sets out a suite of policies and allocations aimed at encouraging modal shift and increasing its capacity. However, bus travel lies largely outside the remit of the local plan as increased services, routes and frequencies do not have a land use element that the LDP could

reasonably affect. Consequently, whilst the LDP includes rail based improvements, there are no specific bus related improvements. The council continue to liaise directly with bus operators regarding service delivery within the county borough and this arrangement provides the platform for considering changes and improvements to services where circumstances change.

In conclusion it is likely that the requirement for increased capacity on sustainable transport modes will manifest itself toward the latter end of the LDP plan period. The LDP already includes measures to improve rail services and mechanisms are in place to deliver improvements in bus services where they are required. Future reviews of the LDP will need to address land use issues associated with further improvements, which is likely to include measures to link to the Cardiff City park and ride hubs that are proposed in the emerging LDP. Overall the LDP provides sufficient scope, when linked to existing mechanisms, to provide for future changes in modal shift.

Re-instatement of the Caerphilly-Machen line will encourage development in the open countryside, destroying the biodiversity of the area

The reinstatement of the Caerphilly-Machen-Newport (Machen Line) rail line for passenger transport use is a council aspiration; it is not required to facilitate any new development, however once developed it would make a number of existing parts of the county borough and a number of allocated sites more sustainable for example Mornington Meadows, Lansbury Park, Waterloo, Rudry Road and Gwern y Domen.. The council supports the principle of the use of the line for passenger transport as it will provide a much needed east-west link between the county borough and the city of Newport. It is not, therefore, a corollary that the use of the line for passenger transport would result in development of the open countryside and adverse impact on biodiversity.

Whilst the opening of the line may make some areas more accessible, this does not mean that these areas are suitable for development. Moreover the Replacement LDP identifies a settlement boundary outside of which urban forms of development would be resisted. Whilst the situation will be reviewed in subsequent reviews of the LDP, it does not follow that open countryside related to the Machen Line would be identified for development.

Consequently the assertion that the reinstatement of the Machen Line would result in development of open countryside is refuted.

Infrastructure

It is considered that the existing infrastructure within Caerphilly cannot cope with any further development and that the area has reached its capacity. The scale of the proposals to be targeted at each of the strategy areas is based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure.

A strategic level assessment was undertaken to assess capacity and identify where infrastructure is required to accommodate further development and the extent to which development can provide or compensate for the necessary social and physical infrastructure. As previously addressed, limited

traffic congestion coupled with the air quality management area in Caerphilly Town were issues highlighted in response to this assessment. Delivering the first phase of the South East Bypass has been identified as a pre-requisite to the development of the South East Caerphilly Strategic Site.

Scale and Density of development

The scale of the proposals to be targeted at each of the strategy areas will be based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The preferred strategy allocates two strategic sites, one of these being within the mid valleys corridor along the A472 strategic highway corridor at Maesycwmmmer. Targeting development to a limited number of growth corridors will prevent the proliferation of larger sporadic development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

Targeting mixed-use development to key transportation and growth corridors in two strategic locations is beneficial as this scale of development has the potential to provide the necessary infrastructure needed to support the planned development.

Concerns are raised in respect of the density and scale of development and its impact on Caerphilly Mountain. The concern is noted. Development of the site is required to be guided by a detailed masterplan, which will need to form part of any planning application for the site. The masterplan will clearly set out the vision and objectives for the site and is required to have full regard to the context of the site and the local, natural, historic and built environment and its special features. A comprehensive landscaping strategy will also be required as part of any future development proposal for the site to provide appropriate mitigation.

Housing

Representors have expressed concern that the development of a strategic site would lead to the devaluation of existing properties within Caerphilly. The valuation of properties is not a planning consideration, nor something that can be addressed through a land use plan. Notwithstanding this the development of a strategic site in this location is more likely to boost the economy within the area, attracting investment and making Caerphilly a more attractive place to live.

It is considered that current housing stock should be updated in preference to the construction of new dwellings and that there is sufficient housing already within Caerphilly, therefore there is no legitimate demand for the development of the strategic site. The Preferred Strategy and Deposit Replacement LDP is a land use plan that is required to allocate land to meet the social and economic needs of residents and business within the county borough, the allocation of sufficient housing land is integral to this. Housing Area Renewal and the upgrading of existing housing stock is not a land use matter that the development plan is able to influence, similarly there is no funding mechanism associated with the LDP to support such initiatives. This is however a matter that is being addressed appropriately through the Housing Division of the Council where appropriate.

The population and housing evidence base used to inform the Preferred Strategy and the Deposit Replacement LDP highlights a need for the plan to allocate land to deliver 12,400 new dwellings required to meet the moderate growth strategy up to 2031. This coupled with the Local Housing Market Assessment (LHMA) evidence, which demonstrates that there is a need to build 526 new dwellings per annum to meet the housing needs of residents, clearly demonstrates the need for new housing within Caerphilly, the SCC and the county borough as a whole.

Noise

Representors have raised concern in respect of the noise and disturbance that the development of this strategic site will cause. The construction and engineering works associated with the development will be carefully controlled through the planning application process.

Contamination

The Council is aware of contamination issues associated with the Ness Tar site and its previous use as a Tar processing Plant. The site forms part of the South East Caerphilly Strategic Site. The site has already been subject to a number of ground investigations that provides information in respect of the degree, nature and extent of contamination and its implications for site reclamation and re-use. The ground investigation report addresses issues of water quality and also identifies an appropriate remediation strategy in order for the site to be able to accommodate a suitable after use.

The remediation strategy is a detailed planning matter that will need to be considered in detail by the Council's Environmental Health Pollution Control Team prior to any development proceeding in order to ensure that: the remediation strategy is satisfactory; it deals with contamination effectively; and poses no risk to residents or their health.

Air quality

The Air Quality Action Plan for the Caerphilly Town Centre Air Quality Management Area identifies the provision of a South East Bypass for Caerphilly as part of its set of measures aimed at alleviating the air quality issues in the area. It is accepted that the Bypass alone will not relieve the problem, but it will contribute towards it, as it will redistribute the existing traffic away from the town centre, particularly the through traffic using the town centre to access the A469 Mountain Road to Cardiff. The Bypass, therefore, is required on air quality grounds and its function is to redistribute existing through traffic away from the town centre.

Public Health

The development of the strategic site would have an adverse impact on public health. The remediation strategy for the site would have to demonstrate and satisfy the Council that contamination can be dealt with effectively and would pose no risk to public health. This is a detailed planning matter and no development would take place prior to planning permission being granted.

Community Facilities

Representors object to the strategic site on the basis that it would place too much pressure on existing services including but not limited to schools, leisure centres, surgeries, police & fire service etc. A strategic level assessment has been undertaken to assess capacity and identify where

infrastructure is required to accommodate further development and the extent to which development can provide or compensate for the necessary social and physical infrastructure. Where there is a demonstrable need for new infrastructure land has been identified accordingly within the Deposit Replacement LDP.

Allotments

The development of South East Caerphilly strategic site will not result in the loss of the allotments, therefore objections on this basis are not valid.

Greenfield Land

The Preferred Strategy acknowledges the unique position of Caerphilly County Borough, at the heart of the Capital City Region and recognises both its attractiveness and landscape setting as well as its important links to Cardiff and Newport.

A number of representations object to the release of significant amounts of greenfield land within the SCC for development and considers that it will have a detrimental impact as the SCC is already overdeveloped and further development in this location would adversely effect the setting of Caerphilly. The scale of the proposals to be targeted at each of the strategy areas is based on the ability of the area to accommodate further growth having regard to the existing social and physical capacity of the area, the presence of environmental constraints, and the extent to which development can provide, or compensate for necessary social and physical infrastructure. The Ness Tar Strategic Site provides for a planned expansion to Caerphilly, targeting development to that part of town that is well served by public transport, and co-locates new homes with jobs, services and facilities, adding to the vibrancy and vitality of this important sub regional centre.

Greenfield land will need to be released for development in addition to brownfield land for the Ness Tar Strategic Site, however by targeting development to a limited number of growth corridors this will prevent the proliferation of larger sporadic development in the open countryside throughout the county borough and limit the pressure on other environmentally sensitive areas.

Brownfield Land

Brownfield land will continue to be allocated where it is suitable and available. However due to 2 successive and successful plan strategies, much of the brownfield land within the SCC has been developed, necessitating the release for greenfield land in addition. Whilst the Council is able to allocate brownfield land for development, the Council is not able to incentivise developers to develop brownfield land. The development of brownfield land is largely down to issues of demand, supply and in turn viability, where developer profit is sufficient, the land will be brought forward for development. The Council is required by Welsh Government to demonstrate that all sites allocated are deliverable within the plan period, where there is uncertainty over viability due to significant site issues, the Council is unable to include the site within the housing supply calculation.

A number of representors consider that the development of the Ness Tar Strategic Site should be restricted to the brownfield footprint of the Former Ness Tar Plant and should not extend to include additional greenfield land. The Council, in allocating land for development has to ensure that allocations are realistic and deliverable and can be delivered during the plan period. This also means

having confidence that development is going to be viable. The brownfield footprint of the site has been available for development for a number of decades, however the significant costs associated with its remediation, combined with the significant costs associated with providing access to the site have been prohibitive and thus the site has remained undeveloped. On balance therefore it is proposed to allow an element of greenfield land to be released to unlock the site for development. The inclusion of this additional greenfield land whilst controversial, will result in the remediation of the brownfield land at Ness Tar to the benefit of the environment and provide for the development of the first phase of the south east bypass, which will not only benefit the development site itself but also reduce congestion in the town and improve air quality in the AQMA.

Sustainability and Climate Change

Issues have been raised in respect of sustainability and the development impact that the site would have on the environment. The preferred strategy has been subject to a sustainability appraisal and strategic environmental assessment. The Council acknowledge that the sustainability appraisal found that the preferred strategy was not the most sustainable option. However, the overall aim of the SEA/SA process is to ensure that sustainability considerations are taken into account in the decision making of the LDP. Consequently whilst the findings of the Strategy Assessment procedure found that another option was the most sustainable strategy, it does not necessarily mean that it is the strategy that should be adopted as the basis for the Deposit Replacement LDP, rather the findings of the assessment highlight considerations that the strategy might need to address.

Stability

A number of representations have identified that there are historic mine workings that the development of the strategic site could disturb. The development of the site will have due regard to the Ground Investigation Report and the Coal Mining Risk Assessment that is to be prepared as an integral part of the detailed design work for the site. Appropriate measures to address these concerns will be identified, agreed and implemented in consultation with the relevant statutory consultees.

ANNEX 4(A) – CANDIDATE SITES RECEIVING NO REPRESENTATIONS

SITE REFERENCE	SITE NAME
ABB001	LAND AT COMMUN ROAD, ABERBARGOED
ABB004	LAND AT COED Y BRAIN HOUSE, ABERBARGOED
ABB005	LAND AT BEDWELTY ROAD, BEDWELTY
ABB006	LAND ADJACENT TO COED-Y-BRAIN QUARRY, BEDWELTY
ABB007	LAND SOUTHWEST OF CWMSYFIOG ROAD, ABERBARGOED
ABB008	LAND EAST OF CHURCH STREET, ABERBARGOED
ABC001	LAND AT 66 LLANFACH ROAD, ABERCARN
ABC002	LAND SOUTH OF RAILWAY TERRACE, ABERCARN
ABV001	SENGHENYDD MINERALS SITE, SENGHENYDD
ABV005	LAND WEST OF CORONATION TERRACE, SENGHENYDD
ABV006	LAND WEST OF 4 TERRACES, SENGHENYDD
ABV007	LAND EAST OF COEDCAE ROAD, ABERTRIDWR
ARG001	LAND OPPOSITE HIGHCREST GARAGE, MARKHAM
ARG002	LAND OFF ABERNANT ROAD, MARKHAM
ARG003	LAND TO THE EAST OF NEW INN PUBLIC HOUSE, BEDWELTY
ABV005	LAND WEST OF CORONATION TERRACE, SENGHENYDD
ABV006	LAND WEST OF 4 TERRACES, SENGHENYDD
ABV007	LAND EAST OF COEDCAE ROAD, ABERTRIDWR
ARG001	LAND OPPOSITE HIGHCREST GARAGE, MARKHAM
ARG002	LAND OFF ABERNANT ROAD, MARKHAM
ARG003	LAND TO THE EAST OF NEW INN PUBLIC HOUSE, BEDWELTY
ARG004	LAND SOUTH OF SPRINGFIELD TERRACE, HOLLYBUSH
ARG005	OLD CWRTYBELLA SCHOOL SITE, COLLIERS ROW, ARGOED
ARG006	LAND AT THE ROCK, BLACKWOOD
ARG007	LAND AT ARGOED FAWR FARM
ARG009	LAND EAST OF JOHN STREET, MARKHAM
BAR001	LAND AT PARK ESTATE
BAR002	HEOLDDU COMPREHENSIVE SCHOOL
BLA002	LAND AT WOODVIEW, HIGH STREET, BLACKWOOD
BLA004	LAND AT 4 BERLLANGRON COTTAGES. CWMGELLI
BTM003	LAND SOUTHWEST OF GELLI WASTAD FARM, MACHEN
BTM005	LAND NORTH OF BRYNHEULOG TERRACE, MACHEN
BTM008	LAND WEST OF CHESTNUT CLOSE, MACHEN
CEF002	LAND ADJACENT TO FAIRVIEW ALLOTMENT GARDENS, PENGAM
CRU001	LAND TO THE REAR OF PENDARREN ROAD, ABERBEEG
CRU002	LAND AT CLY-GRO GREEN BUNGALOW, TRINANT
CRU004	LAND AT PLEASANT VIEW, KENDON HILL
CRU005	STATION ROAD GARAGE, CRUMLIN
CRU006	LAND WEST OF PENTRAPEOD ROAD, PENTRAPEOD
CRU007	LAND WEST OF BRIERLY HOUSE, PENTRAPEOD
CRU008	LAND AT LOWER TON-Y-FELIN FARM, CROESPENMAEN
CRU009	LAND OFF PENTWYN ROAD, NORTH OF TON TY'R BEL
CRU011	LAND NORTHWEST OF LOWER VIADUCT TERRACE, CRUMLIN
CRU012	CROESPENMAEN INDUSTRIAL ESTATE
DAR001	LAND AT LLWYN LAGO FARM, FOCHRIW

DAR002	PLOT OF LAND AT BAILEY STREET, DERI
SITE REFERENCE	SITE NAME
LLA002	LAND EAST OF WINGFIELD CRESCENT, LLANBRADACH
MOJ001	GALLAGHER RETAIL PARK, CAERPHILLY
MRH002	LAND NORTH OF BENJAMIN COURT, RHYMNEY
MRH003	MAERDY CROSSING
MRH004	LAND SOUTH OF MAERDY HOUSE, RHYMNEY
NWT001	LAND AT END OF JUBILEE ROAD, CWMSYFIOG
NWT002	LAND AT STATION TERRACE, BRITHDIR
NWT003	LAND FRONTING SOUTH VIEW TERRACE, NEW TREDEGAR
NWT004	LAND ADJACENT TO TY RHOSYN, BEDWELLY ROAD, NEW TREDEGAR
NWB001	NORTH OF PENTWYNMAWR RECREATION GROUND, NEWBRIDGE
NWB002	LAND NORTH OF AIWA TECHNOLOGY PARK, NEWBRIDGE
NWB003	LAND NORTH OF CELYNEN COLLIERY, NEWBRIDGE
NWB004	LAND NORTH OF GILBOA ROAD, NEWBRIDGE
NWB005	LAND NORTH OF A472, NEWBRIDGE
PEG001	ALLOTMENT GARDENS OFF SUMMERFIELD TERRACE, FLEUR-DE-LYS
PEG002	LAND AT SPRINGFIELD BUNGALOW, PENGAM
PEG003	LAND TO THE REAR OF 40 VICTORIA ROAD, FLEUR-DE-LIS
PEM001	LAND AT COED CARIAD FARM, WOODFIELDSDIE
PEM004	LAND AT OAKDALE GOLF CLUB
PEM005	TIR FILKINS COLLIERY SITE, WOODFIELDSDIE
PEY001	CWM LFOR PRIMARY SCHOOL
PEY002	LAND SOUTH OF GROESWEN ROAD, GROESWEN
PEY003	LAND AT TY FRY, NANTGARW
PEY006	LAND EAST OF EGLYWYSIAN ROAD, GROESWEN
PEY009	LAND AT FORMER RAILWAY SIDINGS, TRECENYDD
PEY010	LAND AT TRECENYDD INDUSTRIAL ESTATE
PLF001	LAND AT CWM-NANT-YR-ODIN, SPRINGFIELD
PLF003	LAND AT TWYN FILKINS FARM, WOODFIELDSDIE
PLT002	FORMER DEPOT SOUTH OF PONTLOTTYN LINK ROAD
RSW002	UNITS 1-4, PONTYMISTER INDUSTRIAL ESTATE
RSW004	EASTERN PART OF LAND ADJ TO RIVER EBBW, PONTYMISTER
RSW005	LAND AT 106 COMMERCIAL STREET, RISCA
STC016	FIELDS SOUTH OF TIR Y BERTH FARM
STJ001	LAND AT BRYNGOLAU, RUDRY
STJ002	LAND AT PORSET ROW, CAERPHILLY
STJ003	LAND AT THE OAKS, RUDRY
STJ004	LAND WEST OF PENTWYNGWYN ROAD, RUDRY
STJ005	LAND NORTH OF WATERLOO PLACE, MACHEN
STJ008	LAND AT THE FORMER TIN WORKS, MACHEN
STJ010	LAND AT PLANT REPAIR YARD, GARTH PLACE, RUDRY
STJ011	UNIT 2, VAN INDUSTRIAL PARK, CAERPHILLY

ANNEX4(B) – REPRESENTATIONS TO CANDIDATE SITES

Candidate Site Reference	Candidate Site Name	Number of Representations
ABB002	Bedwellty Comprehensive School	1
ABB003	Aberbargoed Plateau	1
ABV002	Land south of Cefn llan Road	2
ABV003	Windsor Colliery	1
ABV004	Land to the east of Caerphilly Road, Senghenydd	1
ABC003	Land East of Celyn Road, Abercarn	9
ARG008	Land Northeast of Llwynbach Terrace, Hollybush	1
BLA001	Land at Penycoed Fawr Farm, Bedwelty	1
BLA003	Land at Cwmgelli Farm, Blackwood	2
BLA101	Land at Heol-Y-Cefn	1
BTM001	Land at Coed y Fedw	1
BTM002	Field adjacent to Bedwas House Industrial Estate	2
BTM004	Land East of Clos Trefeddyg, Machen	1
BTM006	Land North of The Old School House, Bedwas	16
BTM007	Land South of Sunny Bank Terrace, Machen	2
BTM009	Land off Pandy Road, Bedwas	21
BTM010	Pandy Road, Bedwas	3
BTM011	Bedwas Colliery	3
BTM012	Bedwas Colliery (Site 2)	2
BTM101	Land off Penrhiw Lane, Machen	1
BTM102	Land west of Pandy Mawr Road	1
CEF001	Land West of Pencoed Avenue, Cefn Fforest	1
CRO101	Coal Yard, Hillary Rise, Pontywaun	1
CRU003	Land at Trinant S.S.C	1
CRU010	Land West of Ty-Mawr Farm Lane, Croespenmaen	2
CRU101	Land at Hafod-Yr-Ynys Road, Hafodyrynys	1
CRU102	Kendon Farm, Crumlin	1
HEN001	Land off Penallta Road	2
HEN002	Land north of Cae Ysgubor, Hengoed	3
HEN003	Land East of Valley View, Cefn Hengoed	9
HEN004	Land North of Cwm Calon, Penallta	2
HEN101	Land at Gasworks Piggery	1
HEN102	Land east of Cheriton Avenue	1
LLA001	Land East of 'The Rise', Llanbradach	25
MAE001	Land at Gwernau Ganol and Gernau Faw, Maescymmer	2
MAE002	Land adjacent to Tredomen Athletic Football Club	2
MAE003	Land at Hawtin Park Industrial Estate, Gellihaf	3
MAE004	Land at Bryn Meadows Golf Club, Maescwmmmer	11
MAE005	Maescwmmmer Strategic Site	14
MAE101	Land adjacent to White Dove Garage, Maescwmmmer	1
MOJ002	Catnic Site, Pontypandy Industrial Estate	2
MOJ003	Land at Virginia Park and Golf Course, Caerphilly	15
MOJ101	Land off Bedwas Road Roundabout	1

Candidate Site Reference	Candidate Site Name	Number of Representations
MRH001	Land west of Carn Y Tyla Terrace, Abertysswg	1
NEL001	Land to the east of Handball Court	6
NEL002	Former Nelson Boys and Girls Club, Nelson	3
NEL003	Land to the east of the Handball Court, Nelson	3
NEL004	Land at Maesmafon Farm, Nelson	7
NEL005	Land Northwest of Ty Du Farm, Nelson	5
NEL006	Land North of Brooklands, Nelson	1
NWB101	Land at Former Inn on the Park	1
PEG004	Land North of Knoll House, Gellihaf	1
PEG005	Land West of Knoll House, Gellihaf	1
PEG006	Southern area of Trelyn scrap yard, Gellihaf	1
PEG101	Land off Victoria Road	1
PEM002	Land Southeast of Llwyn Onn Crescent, Oakdale	1
PEM003	Land North of Woodfield Park Lane, Penmaen	2
PEM006	Land at The Gwrhay, Argoed	1
PEM007	Oakdale Comprehensive School	1
PEM101	Cyncoed Farm, Oakdale	1
PEM102	Land at Oakdale Golf Course	1
PEY004	Land Adjoining The Chapel, Groeswen Road, Groeswen	1
PEY005	Land Opposite Ty Llywd, Groeswen Road	1
PEY007	Land at Ty Llwyd, Groeswen Road	1
PEY008	Land Surrounding Gwaun Gledyr Isaf Farm, Groeswen	1
PEY010	Land at Trecenydd Industrial Estate	9
PEY011	Land at the former Zonner Premises, Hendredenny	1
PEY012	Land north of Hendredenny Drive, Hendredenny	15
PEY013	Land at Abertridwr Road, adj to Cae Caradog	7
PEY101	Land at Energlyn, Caerphilly	1
PEY102	Land at Groeswen Road	1
PLF002	Plot One, Land opposite Gwarren Fach Bungalow	1
PLF004	Land at Glanbryner Farm, Pontllanfraith	1
PLF005	Land at Heolddu, Pontllanfraith	3
PLF101	Land rear of Heol y Coed, Wyllie	9
PLF102	Land south of Heolddu Road, Pontllanfraith	9
PLT001	Land Southeast of Sunnyview, Pontlottyn	1
RSE001	Land off Snowdon Close, Risca	33
RSW003	Rowecord Engineering Site, Pontymister	1
STC001	Fields at Tir y Berth Farm	3
STC002	Greenhill Primary School, Gelligaer	2
STC003	Land Adjoining Bron Las Estate, Penpedairheol	7
STC004	Land West of Cefn Llwyna Farm, Penallta	195
STC005	Land at Heol Adam Farm, Gelligaer	2
STC006	Land adjacent to Green Hill Primary School	4
STC007	Land adjacent to Caerau House, Pengam Road	1
STC008	Land at Rhos Farm, Penpedairheol	11
STC009	Land South of Glyngaer Road, Cefn Hengoed	12

Candidate Site Reference	Candidate Site Name	Number of Representations
STC010	Land at Gelligaer Court, Penpedairheol	4
STC011	Land West of Penybryn Football Ground, Gelligaer	2
STC012	Land Adjacent to Gwaun-Fro Road, Gelligaer	8
STC013	Land at Bryn Quarry, Gelligaer	9
STC014	Land at Bryn Quarry, Gelligaer	3
STC015	Land adjacent to Yew Cottages, Gelligaer	3
STC101	Land at Rhos Farm, Penpedairheol	1
STJ006	Land Northwest of Waterloo, Machen	3
STJ007	Land at Glendale, Van Road, Caerphilly	1
STJ009	Land at Gwern y Domen Farm, Caerphilly	351
STJ101	Land at Van Mansion, Caerphilly	1
STM001	Land at Watford Road	5
STM002	Land at Caerphilly Golf course	16
STM003	Land south of Westhaven, Watford Road, Watford	7
STM004	Land North of Westhaven, Watford Road, Watford	6
STM005	Former Ness Tar Plant and adj. land, Caerphilly	5
STM101	Rhymney Terrace, Caerphilly	1
STM102	Old Wernddu Brickworks	1
YNY001	Land south of The Glade, Wyllie	12
YNY002	Land West of Tylu du House, Mynyddislwyn	1
YNY003	Land West of Pontgam Terrace, Ynysddu	1
YNY004	Land East of Pontgam Terrace, Ynysddu	1
YNY005	Land East of Glanhowy Road, Wyllie	14
YNY006	Land Northwest of Pen-Y-Cwarel Road, Wyllie	13
YNY007	Land adjacent to Pen-Y-Cwarel Road, Wyllie	11
YNY008	Twyn Gwyn House, Twyn Gwyn Road	1
YNY101	Land south of The Glade, Wyllie	9
YNY102	Land east of Glanhowy Road, Wyllie	8
YST001	Land East of Cefn Llwyna Farm, Penallta	2
YST002	Land Adjacent to White Rose Cottage, Ystrad Mynach	1
YST004	Land at New Road, Ystrad Mynach	2
YST005	Land West of Penallta Road, Ystrad Mynach	2
YST006	Land adjacent to Cefn-llwynau Bungalow, Penallta	2
YST007	Units 1-4, Caerphilly Road, Ystrad Mynach	1
YST103	Ystrad Mynach Park & Ride	6

ANNEX 4(C) – ADDITIONAL SITES PROPOSED AS A RESULT OF THE PREFERRED STRATEGY CONSULTATION

Candidate Site Reference	Candidate Site Name	Proposed use	Number of Representations
ABV101	Land east of Coedcae Road (additional site), Abertridwr	Housing	1
ABB101	Land west of Coed y Brain Farm, Aberbargoed	Housing	1
BTM101	Land off Penrhiw Lane, Machen	Housing	1
BTM102	Land west of Pandy Mawr Road, Bedwas	Housing	8
BLA101	Land at Heol y Cefn, Blackwood	Housing	9
CRO101	Coal Yard, Hillary Rise, Pontywaun	Housing	1
CRU101	Land at Hafod-Yr-Ynys Road, Hafodyrynys, Newport	Housing	1
CRU102	Kendon Farm, Crumlin, Newbridge	Housing & Education	1
HEN101	Land at Gasworks Piggery, Hengoed	Housing	1
HEN102	Land east of Cheriton Avenue, Cefn Hengoed	Housing	1
HEN103	Land at Cylla Valley, Hengoed	Housing	1
MAE101	Land adj to White Dove Garage, Maesycwmmmer	Housing	4
MOJ101	Land off Bedwas Road Roundabout, Caerphilly	Mixed use	1
NWB101	Land at former Inn on the Park, Fields Park, Newbridge	Housing	1
PEG101	Land off Victoria Road, Fleur de Lys, Blackwood	Housing	9
PEM101	Cyncoed Farm, Oakdale	Housing	1
PEM102	Oakdale Golf Course, Oakdale	Housing	9
PEY101	Land at Energlyn, Caerphilly	Housing	9
PEY102	Land at Groeswen Road, Hendredenny, Caerphilly	Housing	9
PEY103	Land west of Hendredenny, Caerphilly	Housing	1
PLF101	Land rear of Heol y Coed, Wyllie, Blackwood	Green Wedge	1
PLF102	Land south of Heolddu Road, Wyllie, Blackwood	Green Wedge	1
RSW001	Danygraig Works, Risca	Housing	6
STC101	Land at Rhos Farm, Penpedairheol, Hengoed	Housing	9
STC102	Land west of Tiryberth Farm, Cefn Hengoed	Housing	1
STC103	Land south-west of Tiryberth Farm, Cefn Hengoed	Housing	1
STC104	Land at New Road, Tiryberth	Housing	9
STC105	Land south of Tiryberth Farm, Cefn Hengoed	Housing	1
STC106	Land south of Gelligaer Court, Hospital Road, Penpedairheol	Housing	9
STC107	Land adjacent to Bryncoed Terrace, Penpedairheol	Green Wedge	9

Candidate Site Reference	Candidate Site Name	Proposed use	Number of Representations
STJ101	Land north of Van Mansion, Gwern-domen Farm Lane, Caerphilly	Inclusion within settlement boundary	1
STJ102	Land adjacent to The Oaks, Rudry	Housing	1
STJ103	Land adjacent to Garth Lane, Rudry	Housing	1
STJ104	Land west of Pentwynwyn Road (reduced site), Rudry	Housing	1
STM101	Land at Rhymney Terrace, Caerphilly	Housing	1
STM102	Old Wernddu Brickworks, Caerphilly	Housing	1
YNY101	Land south of The Glade, Wyllie, Blackwood	Green Wedge	1
YNY102	Land east of Glanhowy Road, Wyllie	Green Wedge	1
YNY103	Land at Fernlea, The Avenue, Wyllie	Housing	1
YST101	Land north of A472, Tredomen	Housing	10
YST102	Land south of A472, Tredomen	Housing	Included above

Please note: A candidate site register containing maps for candidate sites including all the additional sites proposed as a result of the Preferred Strategy Consultation is available

ANNEX 4(D) – NOT DULY MADE REPRESENTATIONS

Summary: In total 7 representors submitted representations that were not duly made as they were submitted outside of the statutory consultation period. In total, there were 25 unduly made representations. The representations are summarised below:

Representations in Support

Support for the Strategic Site East of Caerphilly

Representations in Objection

Objection to candidate site BLA003 Land at Cwm Gelli Farm, Blackwood

Objection in principle to the development of greenfield land

Objection to candidate site PEY012 Land north of Hendredenny as:

- Existing infrastructure cannot support further development
- The increase in volume of traffic would create highway safety issues
- St Cennydd Road and Cwrt Rawlin roundabout are saturated with road traffic

Objection to candidate site CRU010 as:

- Development of this site would have a detrimental impact on wildlife habitat.

Objection to any waste management facilities on Ty Duffryn industrial estate, in particular any proposal for a waste transfer station.

Objection to the scale of population and housing growth

Objection to a strategic site within the Mid Valleys Corridor due to:

- Scale
- Presence of sink holes
- Flooding issues

Representations in comment

Two comments in respect of candidate site MAE004:

- There should be no road access from Wyllie to the candidate site
- A green wedge should remain between Wyllie and the candidate site to protect the identity and character of the village, thus preventing coalescence

One comment in respect of candidate site PLF005:

- A green wedge should remain between Wyllie and the candidate site to protect the identity and character of the village, thus preventing coalescence

One comment in respect of a green wedge:

- A green wedge should be maintained between Wyllie and Ynysddu to protect the identity and character of the village

Two comments in respect of candidate site YNY001:

- The development of the site would place too much pressure on the highway infrastructure
- The development of the site would change the identity and character of the village unacceptably.

Four comments in respect of candidate site YNY005:

- The development of the site would place too much pressure on the highway infrastructure
- The development of the site would change the identity and character of the village unacceptably.
- The site is a Site of Importance for Nature Conservation
- A green wedge should be maintained between Wyllie and this candidate site to protect the identity and character of the village
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Two comments in respect of candidate site YNY006:

- The development of the site would place too much pressure on the highway infrastructure
- The development of the site would change the identity and character of the village unacceptably.

One comment in respect of candidate site YNY007:

- The development of the site would place too much pressure on the highway infrastructure

Deposit Replacement Local Development Plan: Soundness Tests Self Assessment	
TEST 1: DOES THE PLAN FIT?	
Does it have regard to national policy and WSP?	The Deposit Replacement LDP has full regard to National legislation and Guidance including The Wales Spatial Plan, National Transport Plan, Towards Zero Waste- One Wales: One Planet, Vibrant and Viable Places and National Planning Policy (including Planning Policy Wales, Minerals Planning Policy Wales, Technical Advices Notes, Minerals Technical Advice Notes and Planning Circulars).
Does it have regard to Well-being Goals	The Deposit Replacement LDP has full regard to Well-being goals, social characteristics, health & wellbeing, households & housing, economic activity, learning Caerphilly and Greener Caerphilly, have amongst others, been key considerations in the formulation of policy and subsequent land use allocations.
Does it have regard to the Welsh National Marine Plan?	The Welsh National Marine Plan does not impact upon Caerphilly County Borough as it sets out how sustainable development will be achieved in the Welsh marine area.
Is it consistent with regional plans, strategies and utility programmes?	The Deposit Replacement LDP is consistent with regional plans, strategies and utility programmes. Due regard has been given to the Wales Spatial Plan, Turning Heads – A Strategy for the Heads of the Valleys (2006), Vibrant and Viable Places (2013), Delivering a Future with Prosperity: SE Wales Regional Strategic Framework (October 2013), Strategic Development Plan – Cardiff Capital Region, Regional Transport Plan and South Wales Regional Aggregates Working Party – Regional Technical Statement.
Is it compatible with the plans of neighbouring authorities?	Collaboration on matters of greater than local significance or on issues that impact on more than one local authority is critical to the soundness of the Replacement LDP.
Does it reflect the Single Integrated Plan (SIP) or the National Park Management Plan (NPMP)?	In order to realise the long term Strategic Vision for the County Borough, the Replacement Deposit LDP reflects ‘Caerphilly Delivers’, the Single Integrated Plan produced by Caerphilly Local Service Board.
TEST 2: IS THE PLAN APPROPRIATE?	
Is it locally specific?	The Deposit Replacement LDP is locally specific and is informed by a functional analysis of the county borough, the identification of key trends from the existing and emerging evidence base, the consideration of different population and household growth scenarios, the consideration of different employment growth scenarios, consultation with key partner organisations and key stakeholders, consideration of the issues raised through the annual monitoring of the Adopted Caerphilly County Borough Local

	Development Plan up to 2021, the availability of land proposed for development consideration of the up to date evidence base and consideration of neighbouring local planning authorities development strategies.
Does it address the key issues?	The Deposit Replacement LDP addresses all the key issues identified in the collation and development of the evidence base used to underpin the plan.
Is it supported by robust, proportionate and credible evidence?	The Deposit Replacement LDP is supported by a robust, proportionate and credible evidence. This is evidenced by a series of Background Papers and Background Studies, which have been made available.
Can the rationale behind plan policies be demonstrated?	The rationale behind plan policies can be clearly demonstrated. The evidence supporting policy decisions can be found in the series of Background Papers and Background Studies, produced to support the Deposit Replacement LDP.
Does it seek to meet assessed needs and contribute to the achievement of sustainable development?	The Deposit Replacement LDP seeks to meet assessed needs and contributes towards the achievement of sustainable development.
Are the vision and the strategy positive and sufficiently aspirational?	The vision accords with and fulfils guidance set out in Paragraph 5.5 of the Local Development Plan Manual in so far as the vision is “well rounded so that there should be a balance between economic, social and environmental objectives.” The Council considers that the Vision and Strategy are positive and are sufficiently aspirational as well as being realistically deliverable.
Have the ‘real’ alternatives been properly considered?	The Council has considered a number of ‘real’ alternatives in the development of the Deposit Replacement LDP, identifying and testing realistic strategy options to deliver the Vision and Objectives of the plan over the plan period. In total, five alternative spatial options were considered including their component parts in order to arrive at the Plan Strategy.
Is it logical, reasonable and balanced?	The Replacement Deposit LDP is logical, reasonable and balanced, supported by a robust and credible evidence base.
Is it coherent and consistent?	The Replacement Deposit LDP is coherent and consistent, clearly setting out the Strategy Policies, the County Wide Policies and the Allocations & Designations that shows how the development strategy will be delivered on the ground.
Is it clear and focused?	The Replacement Deposit LDP is clear and focused and is set out in three sections to allow for ease of use, Section A – Strategy Policies, Section B – Countywide Policies and Section C – Allocations and Designations.

TEST 3: WILL THE PLAN DELIVER?

Will it be effective?	The Council has confidence that the Plan will be effective and deliverable. The Plan is supported by a robust and credible evidence base that is reflected by policies in the Plan.
Can it be implemented?	The Council considers that allocations within the Deposit Replacement LDP are realistic and deliverable. The Council has identified where significant infrastructure is necessary to deliver development, this is identified within the Infrastructure Delivery Plan. The Council are satisfied that significant infrastructure can be delivered as part of development and that this would not render sites unviable.
Is there support from the relevant infrastructure providers both financially and in terms of meeting relevant timescales?	The Council are satisfied that there is support for relevant infrastructure both financially and in terms of meeting the relevant timescales. The strategic sites have been accompanied by Site Delivery Statements and will be providing the most significant infrastructure as part of development.
Will development be viable?	The Council are satisfied that allocations and designations are viable as far as reasonably practicable.
Can the sites allocated be delivered?	The Council are satisfied that allocations and designations are deliverable as far as reasonably practicable.
Is the plan sufficiently flexible? Are there appropriate contingency provisions?	The Council consider that the plan is sufficiently flexible to deal with change.
Is it monitored effectively?	The Plan is supported by a robust monitoring framework that includes key triggers and action points in order to determine the plan's effectiveness in terms of delivery and implementation. The Council has invested significant time and resources into its monitoring systems and these will be modified as necessary to reflect the monitoring requirements of the Replacement LDP

ANNEX 6: EQUALITY IMPACT ASSESSMENT

THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

NAME OF NEW OR REVISED PROPOSAL*	Caerphilly County Borough Deposit Replacement Local Development Plan
DIRECTORATE	Communities
SERVICE AREA	Planning
CONTACT OFFICER	Rhian Kyte
DATE FOR NEXT REVIEW OR REVISION	Please refer to LDP Delivery Agreement. The LDP is subject to a statutory process governed by legislation and similarly a statutory monitoring procedure.

****Throughout this Equalities Impact Assessment Form, 'proposal' is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.***

INTRODUCTION

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities issues have been consciously considered throughout the decision making processes of the work undertaken by every service area in the Council and work done at a corporate level.

The form should be used if you have identified a need for a full EIA following the screening process covered in the Equalities Implications in Committee Reports Guidance document (available on the Equalities and Welsh Language Portal on the intranet).

The EIA should highlight any areas of risk and maximise the benefits of proposals in terms of Equalities. It therefore helps to ensure that the Council has considered everyone who might be affected by the proposal.

It also helps the Council to meet its legal responsibilities under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and the Welsh Language Measure 2011. There is also a requirement under Human Rights legislation for Local Authorities to consider Human Rights in developing proposals.

The Council's work across Equalities, Welsh Language and Human Rights is covered in more detail through the Strategic Equalities Objectives and Action Plan 2012.

This approach strengthens work to promote Equalities by helping to identify and address any potential discriminatory effects before introducing something new or changing working practices, and reduces the risk of potential legal challenges.

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the Equalities and Welsh Language Portal (the Committee report guidance mentioned above, the Consultation and Monitoring guidance) and the Council's Equalities and Welsh Language team can offer support as the EIA is being developed - the contact email is equalities@caerphilly.gov.uk.

PURPOSE OF THE PROPOSAL

1	<p>What is the proposal intended to achieve? <i>(Please give a brief description of the purpose of the new or updated proposal by way of introduction.)</i></p> <p>The LDP is the Council's over-arching land-use strategy for the period up to 2031. The Plan identifies land suitable for all types of development, and areas that should be protected from development.</p> <p>The principles underlying the LDP (i.e. the Vision, Aims, and Objectives) were derived in partnership with the Local Service Board, partner organisations and key stakeholders.</p> <p>The principles of sustainable development and equalities underpin the LDP.</p>
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2	<p>Who are the service users affected by the proposal? <i>(Who will be affected by the delivery of this proposal? e.g. staff members, the public generally, or specific sections of the public i.e. youth groups, carers, road users, people using country parks, people on benefits etc.)</i></p> <p>The LDP directly affects all residents of the county borough, and many organisations and development agencies, through the land-use allocations made in the Plan.</p>
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IMPACT ON THE PUBLIC AND STAFF

3	<p>Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals? <i>(What has been done to examine whether or not these groups have equal access to the service, or whether they need to receive the service in a different way from other people?)</i></p> <p>The policies and proposals of the LDP apply to all groups and individuals in the county borough.</p> <p>Efforts were made to secure the participation of all groups in the plan preparation process. These efforts were not always successful, because it proved difficult to secure the participation of some groups in the process: for example, young people.</p>
	<p><u>Actions required</u></p> <p>The Delivery Agreement (DA) commits the Council to producing the LDP according to the stated timescales laid down by the timetable and in accordance with the</p>

	<p>consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA. The CIS attempts to engage as wide an audience as practical within the time and resources available and uses a wide range of consultation mechanisms to engage as wide an audience as possible in the plan preparation process. The Council is committed to and will continue to adhere to the DA & CIS.</p>
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4	<p>What are the consequences of the above for specific groups? <i>(Has the service delivery been examined to assess if there is any indirect affect on any groups? Could the consequences of the policy or savings proposal differ dependent upon people's disability, race, gender, sexuality, age, language, religion/belief?)</i></p> <p>This is a difficult question to answer, because the policies and proposals in the LDP are very wide-ranging in their effects, and the particular groups referred to are both unspecified and potentially very numerous. This perhaps is more relevant to individual Council policies, rather than Council strategies</p>
	<p><u>Actions required</u> The Delivery Agreement (DA) commits the Council to producing the LDP according to the stated timescales laid down by the timetable and in accordance with the consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA. The CIS attempts to engage as wide an audience as practical within the time and resources available and uses a wide range of consultation mechanisms to engage as wide an audience as possible in the plan preparation process. The Council is committed to and will continue to adhere to the DA & CIS.</p>

INFORMATION COLLECTION

5	<p>Is full information and analysis of users of the service available? <i>(Is this service effectively engaging with all its potential users or is there higher or lower participation of uptake by one or more groups? If so, what has been done to address any difference in take up of the service? Does any savings proposals include an analysis of those affected?)</i></p> <p>This perhaps relates more to the participation in the preparation of the LDP, rather than its content.</p> <p>Demographic information was requested on all those wishing to be placed on the LDP Consultation Database, from which it is clear that the main characteristic of respondents is the unbalanced age structure, the young being noticeably underrepresented.</p>
	<p><u>Actions required</u> The Delivery Agreement (DA) commits the Council to producing the LDP according to</p>

	<p>the stated timescales laid down by the timetable and in accordance with the consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA. The CIS attempts to engage as wide an audience as practical within the time and resources available and uses a wide range of consultation mechanisms to engage as wide an audience as possible in the plan preparation process. The Council is committed to and will continue to adhere to the DA & CIS.</p>
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CONSULTATION

6	<p>What consultation has taken place? <i>(What steps have been taken to ensure that people from various groups have been consulted during the development of this proposal? Have the Council's Equalities staff been consulted? Have you referred to the Equalities Consultation and Monitoring Guidance?)</i></p> <p>Extensive consultation has taken place to ensure that all views have been taken into account in the preparation of the Deposit LDP in accordance with the LDP Delivery Agreement (DA). The DA commits the Council to producing the LDP according to the stated timescales laid down by the timetable and in accordance with the consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA.</p>
	<p><u>Actions required</u></p> <p>The Delivery Agreement (DA) commits the Council to producing the LDP according to the stated timescales laid down by the timetable and in accordance with the consultation processes contained within the Community Involvement Scheme (CIS) both of which are contained in the DA. The CIS attempts to engage as wide an audience as practical within the time and resources available and uses a wide range of consultation mechanisms to engage as wide an audience as possible in the plan preparation process. The Council is committed to and will continue to adhere to the DA & CIS.</p>

MONITORING AND REVIEW

7	<p>How will the proposal be monitored? <i>(What monitoring process has been set up to assess the extent that the service is being used by all sections of the community, or that the savings proposals are achieving the intended outcomes with no adverse impact? Are comments or complaints systems set up to record issues by Equalities category to be able analyse responses from particular groups?)</i></p> <p>Welsh Government Planning Guidance requires authorities to establish a Monitoring procedure, detailing Indicators and Targets to assess the progress of implementation of the LDP. The results will be reported in an Annual Monitoring Report on the LDP.</p>
	<p><u>Actions required</u></p>

	To continue reporting through an Annual Monitoring Report as required by Welsh Government Guidance.
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8	<p>How will the above be evaluated? <i>(What methods will be used to ensure that the needs of all sections of the community are being met?)</i></p> <p>The LDP will be subject to review on a four-yearly cycle. This review will provide the opportunity to assess the implications of the Plan for particular Groups, and to modify the policies and proposals of the Plan to remedy any deficiencies.</p>
	<p><u>Actions required</u> Ensure that an LDP review is undertaken every 4 years</p>
9	<p>Have any support / guidance / training requirements been identified? <i>(Has the EIA or consultation process shown a need for awareness raising amongst staff, or identified the need for Equality training of some sort?)</i></p> <p>No support / guidance / training requirements have been identified</p>
	<p><u>Actions required</u> The resource implications and requirements are addressed and identified in the Delivery Agreement and Community involvement Scheme. No additional training requirements have been identified in order to undertake a LDP review.</p>

10	<p>Where you have identified mitigating factors in previous answers that lessen the impact on any particular group in the community, or have identified any elsewhere, please summarise them here.</p> <p>Please see above</p>
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11	<p>What wider use will you make of this Equality Impact Assessment? <i>(What use will you make of this document i.e. as a consultation response, appendix to approval reports, publicity etc. in addition to the mandatory action shown below?)</i></p> <p>This EIA will be attached as an appendix to the Initial Consultation Report..</p>
	<p><u>Actions required</u></p> <ul style="list-style-type: none"> EIA, when completed, to be returned to equalities@caerphilly.gov.uk for publishing on the Council's website.

Completed By:	Strategic & Development Plan Team
Date:	7 January 2016
Name of Head of Service:	Pauline Elliot

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