

**Caerphilly County Borough  
2<sup>nd</sup> Replacement  
Local Development Plan  
Up to 31<sup>st</sup> March 2035**

**Initial Consultation Report**

**Pre-Deposit Plan (Preferred Strategy)**

**Draft – May 2023**



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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) The steps taken to publicise plan preparation, and how this complies with the Community Involvement Scheme contained in the Delivery Agreement;
  - (b) Bodies involved, notified or consulted at the pre-deposit public consultation stage;
  - (c) The main issues raised, and how they have influenced the next stage of plan preparation;
  - (d) A general summary of comments and the LPA's response;
  - (e) A schedule of individual site related comments and new candidate site submissions.

## **2 Compliance with the Delivery Agreement**

- 2.1 The Pre-Deposit Public Consultation took place between 19th October and 30th November 2022.
- 2.2 The Approved Delivery Agreement (DA) details the stages involved in the Plan-making process, the time each part of the process is likely to take, and it outlines the Council's approach to community engagement and involvement in the preparation of the 2RLDP. It is split into two key parts:
- The Timetable
  - The Community Involvement Scheme

### **The Timetable**

- 2.3 The timetable provides an indication of when various stages of plan preparation will take place. Definitive dates are provided up to the deposit stage and indicative dates for later stages. The timetable allows for a marginal degree of flexibility, however, any amendments to the DA will require approval by the Council prior to Welsh Government agreement.
- 2.4 The meeting of Special Council, where the Preferred Strategy was due to be considered, was cancelled and re-arranged due to the death of Her Majesty Queen Elizabeth II. This took the plan beyond the agreed 3-month slippage period set out in the approved DA.
- 2.5 However, Welsh Government confirmed agreement to this additional slippage of the plan in a letter to the Council dated 22 September 2022. This confirmed the position that the national significance of that event, would not result in any adverse effect on the plan's stakeholders.

### **Community Involvement Scheme (CIS)**

- 2.6 The CIS sets out the Council's principles, strategy and mechanisms for community and stakeholder engagement throughout the revision process. The Council will need to comply with the requirements for community engagement that are set out in the CIS and any deviation should be exceptional and fully justified. The consultation processes contained within the CIS have been followed.

### **Consultation Bodies**

- 2.7 Every individual and organisation on the LDP Consultation Database was notified by letter or email to inform them of the Pre-Deposit Consultation. In total, 626 bodies were contacted and provided with details of how to access the consultation documents and told how to respond. For reference, at the start of the consultation period, the database included:
- 153 Specific consultees, including County Borough Councillors, Members of Senedd, Members of Parliament, Community and Town Councils, neighbouring Local Authorities
  - 150 General consultees

- 106 Developers/Landowners
- 217 Members of the Public

2.8 The list is of course continually changing, but an indication of the range of bodies that were consulted is indicated by the lists of consultation bodies as detailed in the Delivery Agreement, see Appendix 1.

### **Consultation Methods**

2.9 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:

- Emails / Letters to all on the LDP Consultation Database;
- A leaflet was distributed to every household within the county borough;
- Posters were displayed in all libraries and within selected shops;
- Interactive website displaying all consultation material, allowing direct, online comments to be made.
- Caerphilly County Borough Council website & Social Media Promotion:
  - CCBC LDP web pages - 33,600 hits.
  - CCBC LDP Consultation page - 3,101 hits.
  - CCBC press release - 1,500 hits.
  - Facebook post, October 2022 – 4,668 hits.
  - Facebook post, November 2022 – 3,831 hits.
  - Twitter, October 2022 – 882 hits
  - Twitter, November 2022 – 426 hits.
- Gov Delivery email bulletin:
  - October 2022 - 31,000 subscribers;
  - November 2022 – 33,000 subscribers
- Caerphilly County Borough Council website Press release, October 2022, entitled 'Have your say on the 2<sup>nd</sup> Replacement Local Development Plan.'
- An article was published in the Caerphilly Observer on 19<sup>th</sup> October 2022, entitled 'Consultation begins on plan that will shape the county borough.'
- Mobile exhibitions held across the County Borough in the settlements of Caerphilly, Risca, Bargoed, Blackwood and Maesycwmmmer
- Static exhibition based at Tredomen Business & Technology Centre, Ystrad Mynach.
- Officers were available via the LDP Hotline and on an appointment basis throughout the consultation period.

**Availability of Documents**

- 2.10 The key consultation documents, including an Easy Read Summary, were available via the Council's website and hard copies were displayed in all libraries and at Tredomen Business and Technology Centre. Paper copies were provided in exceptional circumstances.
- 2.11 Representations could be made online via the consultation portal, via email or letter and paper versions of representation forms were also available.

### **3 The Pre-Deposit Public Consultation**

3.1 The Pre-Deposit Plan was published in October 2022, representing the completion of a period of pre-deposit plan preparation and engagement, which clearly influenced its development. The following documents were available for public consultation:

- The 2<sup>nd</sup> Replacement Caerphilly County Borough Local Development Plan up to 2035 Pre-Deposit Plan (Preferred Strategy), and Easy Read version;
- Supporting Information, including:
  - The Initial Integrated Sustainability Appraisal (ISA) Report and ISA Scoping Report (see Chapter 4, para 4.15 and Annex 4).
  - The Candidate Site Register and a Draft Candidate Site Assessment Summary were also published, and comments were invited on the submitted candidate sites.

#### **Pre-Deposit Plan (Preferred Strategy)**

3.2 The Pre-Deposit Plan (Preferred Strategy) identified the key land use issues that the plan sought to address, and it identified a Vision for the county borough and a number of aims and objectives to achieve that vision.

3.3 It outlined eleven potential growth scenarios and six potential strategy options for the future development of the county borough.

3.4 The Preferred Strategy proposed:

- Option J – CCR Working Age Population Growth scenario; and
- A hybrid strategy, comprised of elements of Option 3: Key Strategic Site at Maesycwmmer; Option 4: Metro Investment Focus and Option 5: Town Centre First

#### **Supporting Information**

3.5 The following background and evidence base documents were also published:

- Initial Integrated Sustainability Appraisal (ISA) Report
- ISA Scoping Report
- PS1 Strategy Options Assessment
- PS2 Pre-Deposit Engagement
- PS3 Settlement Role, Function and Sustainability Analysis
- PS4 Population and Housing Growth Options
- PS5 Housing Land Supply and Affordable Housing Target
- PS6 Local Housing Market Assessment
- PS7 Gypsy and Traveller Accommodation Assessment



- PS8 Candidate Site Methodology
- PS9 Candidate Site Register
- PS10 Candidate Site Summary
- PS11 Transport Background Evidence Paper
- PS13 Regional Low Carbon Energy Assessment
- PS14 Employment Background Evidence Paper
- PS15 Larger than Local Employment Study
- PS16 Employment Land Review
- PS17 Retail Capacity Study
- PS18 Census 2021 and the implications for the 2<sup>nd</sup> Replacement Local Development Plan

## **4 Responses to the Public Consultation**

- 4.1 A total of 1,986 representations were received as part of the Public Consultation. Of these, 4 representations were withdrawn as they were made in error or falsely made, and 14 representations were not duly made as they were received after the end of the consultation period. These will not be considered further.
- 4.2 An initial assessment of the representations received within the statutory consultation period indicated that:
- 327 referred to the Pre-Deposit Plan (Preferred Strategy) and supporting information, including 4 which referred to the ISA.
  - 1,641 related to Candidate Sites, including 468 which referred to the Strategic Site (Parc Gwernau, Maesycwmmmer).
- 4.3 In addition, 22 new sites were submitted as part of the 2<sup>nd</sup> Call for Candidate Sites.

### **Comments on the Pre-Deposit Plan**

- 4.4 A total of 327 representations were made in respect of the Pre-Deposit Plan and its supporting information, 100 were in support, 227 raised objection.
- 4.5 Of these, 4 related to the ISA and these are considered in paragraphs 4.13–4.14.
- 4.6 Many representations related to a single issue. However, there were significant comments received from Welsh Government in respect of general conformity with Future Wales: The National Plan 2040 (Future Wales).
- 4.7 Section 601(3) of the Planning and Compulsory Purchase Act 2004 requires that all Local Development Plans be in general conformity with the National Wales. Future Wales was published in February 2021 and is the highest tier in the development plan for Wales. Any Local Development Plan prepared after that date needs to be in general conformity with Future Wales.
- 4.8 Welsh Government, as part of their response to any development plan consultation, must issue a statement in respect of whether a plan is in general conformity with Future Wales. Welsh Government submitted their response to the Pre-Deposit Plan consultation on 25 November 2022.
- 4.9 The principal issues raised are in respect of:
- The Strategic Site at Parc Gwernau, Maesycwmmmer
  - Regional Collaboration
  - Resilient Ecological Networks and Green Infrastructure
- 4.10 Annex 1 details these principal issues and provides a comprehensive response to the comments made.

- 4.11 Annex 2 provides a summary of other representations made in respect of the Pre-Deposit Plan and its supporting information. It is not intended to give a comprehensive response to each, and every comment received, rather a summary of the issues raised.
- 4.12 A number of representations relate to the proposed Strategic Site, Parc Gwernau, Maesycwmmmer. These are addressed in paragraphs 4.15–4.16 and Annex 4.

#### **Comments on the ISA**

- 4.13 A total of 4 representations were made in respect of the ISA, 1 was in support and 3 raised objections.
- 4.14 Annex 3 provides a summary of representations received in respect of the ISA. It is not intended to give a comprehensive response to each, and every comment received, rather a summary of the issues raised.

#### **Comments on the Strategic Site (Parc Gwernau, Maesycwmmmer)**

- 4.15 Representations were made on the Strategic Site both as part of the Preferred Strategy and as part of the Candidate Sites Register:
- Preferred Strategy, Policy PS5: Strategic Site, Maesycwmmmer – 5 in support and 17 raised objection.
  - Candidate Site Register – 8 in support and 460 raised objection.
- 4.16 Annex 4 provides a summary of representations made in respect of the Strategic Site. It is not intended to give a comprehensive response to each, and every comment received, rather a summary of the issues raised.

#### **Comments relating to Candidate Sites**

- 4.17 A total of 1,641 representations were made in respect of Candidate Sites.
- 4.18 The publication of the Candidate Sites Register unsurprisingly generated a large number of responses in relation to individual sites; chief among these were:
- Parc Gwernau, Maesycwmmmer (468 representations – 8 support, 460 Objections);
  - Land at Nantycalch Farm (Option A), Caerphilly (85 representations - 2 support, 83 Objections);
  - Land near Van Mansion, Caerphilly (61 representations - 2 support, 59 Objections);
  - Penyfan Farm, Risca Road, Risca (57 representations, all objections);
  - Land west of Albertina Road, Treowen (54 representations - 5 support, 49 Objections);
  - Land south of Rudry Road, Caerphilly (53 representations - 2 support, 51 Objections); and

- Land at Myrtle Grove, Hengoed (51 representations, all objections).
- 4.19 Annex 5A contains a summary of the number of representations made on Candidate Sites, either in support or objection. Whilst the Candidate Sites Register and Draft Candidate Site Assessment Summary were published as part of the consultation, the Pre-Deposit Public Consultation was not primarily concerned with Candidate Site assessments, and therefore the report does not provide responses to the representations made.
- 4.20 For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised, for example in respect of ecology, drainage, access, etc. in the next stage of the process.
- 4.21 Annex 5B contains a list of Candidate Sites that received no representations.

### **2<sup>nd</sup> Call for Candidate Sites**

- 4.22 A total of 22 sites were submitted as part of the 2<sup>nd</sup> Call for Candidate Sites, these are listed in Annex 6.

**ANNEX 1: WELSH GOVERNMENT COMMENTS ON GENERAL CONFORMITY WITH FUTURE WALES**

Objections raised	Council Response	Recommendation
<p>The Welsh Government considers Spatial Option 3 - A Strategic Site of at least 2,700 homes (1,200 in the plan period) at Parc Gwernau, Maesycwmmmer is not in General Conformity with Future Wales, specifically policies 1, 2, 9, 12, 19, 33 and 36.</p> <p>Future Wales places great emphasis on the development of National Growth Areas in a sustainable manner. Growth must be well-planned, sustainable, encourage active travel and public transport and be developed within a wider regional consensus.</p> <p>Reasons</p> <p>The strategic site at Maesycwmmmer will be one of the largest development sites in Wales. The site is capable of delivering 2,700 homes (30dph)</p>	<p>The Strategic Site at Maesycwmmmer has been identified as part of the overall strategy for the 2RLDP as a principal element in delivering the growth proposed for the plan period. The Strategic Site has been specifically identified to facilitate addressing a wide range of issues that can only be addressed through the development quantum generated by a large development. Welsh Government’s perception that the site is only allocated to deliver a strategic highway improvement and will be car dominated is inaccurate and lacks any substantive evidence to support that position and is refuted by the Council.</p> <p>The Strategic Site is the only large-scale site in the County Borough that is appropriate for delivering a development quantum required to deliver wide ranging benefits across a range of issues. There are no sites to accommodate anywhere near the level of development required to deliver the benefits proposed at Maesycwmmmer in or around any of the Principal Towns or Local Centres. The Maesycwmmmer site is the <u>only</u> site that can accommodate this level of growth and bring this level of benefit.</p> <p>The Strategic Site is one of <b><u>the most sustainably located sites</u></b> that the Council are considering for inclusion in the emerging plan. It is within active travel distance of:</p> <ul style="list-style-type: none"> <li>• 2 Principal Towns,</li> <li>• One Local Centre,</li> <li>• 4 Railway stations (on two different railway lines),</li> <li>• The Council’s primary employment centre, Oakdale Business Park, and</li> </ul>	<p>The Council considers the options to move forward from this position.</p>

<p>to 3600 homes (40dph) with 1,200 homes proposed in this plan period. The site will be primarily residential, and the proposed layout is 'road dominated'. Issues related to the delivery of the spine road, to relieve congestion on the A472, raise serious questions as to whether wider comprehensive development, placemaking and a modal shift away from the private car can be achieved. The WG considers the Maesycwmmmer strategic site is not in general conformity with the following policies of Future Wales. (See also Annex 2.)</p> <p>Policy 1 - Where Wales will grow.</p> <p>Caerphilly County Borough is in a national growth area. The WG supports sustainable growth in national growth areas to ensure that we respond to climate change challenges and make best use of our resources. Growth areas must be sustainably planned, reduce the</p>	<ul style="list-style-type: none"> <li>• Within walking distance of another employment centre, Dyffryn Business Park.</li> </ul> <p>The Strategic Site at Maesycwmmmer has, therefore been identified for the following primary reasons:</p> <ul style="list-style-type: none"> <li>• The site accommodates a significant amount of the overall housing growth for the plan period, alleviating pressure on valuable and important greenfield sites on the periphery of other settlements;</li> <li>• The site provides a development quantum that can address issues across an area wider than just the site itself, e.g. education, health provision, congestion/air quality;</li> <li>• The site is the most sustainably located site that is being considered by the Council due to its proximity to 2 Town Centres, multiple Metro Nodes and significant employment opportunities;</li> <li>• The site is ideally located to maximise the opportunities arising from the investment in the Metro, both now and in the future;</li> <li>• The mid-valleys comprises a contiguous area of urban development spanning the mid-valleys Strategic Route (A472). The settlement pattern in this area is more like a conventional urban conurbation rather than the traditional linear settlements typical of the Valleys. The area has been highly successful in attracting substantial public and private investment that has succeeded in transforming the mid valleys area in the County Borough over successive development plan periods and it makes sense to locate a sizeable proportionate level of proposed new development into this area.</li> </ul> <p>Welsh Government raises questions regarding the ability of the Strategic Site to deliver wider comprehensive development, placemaking and modal shift away from the private car. This position is predicated upon</p>	
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<p>need to travel by car, encourage walking and cycling, maximise public transport usage and embed green infrastructure. Growth areas must embed these principles within a wider regional consensus.</p> <p>Policy 2 – Shaping Urban Growth and Regeneration – Strategic Placemaking</p> <p>Strategic placemaking should enable people to walk/cycle to local facilities and maximise public transport. Urban growth and regeneration should be focused within city and town centres, as well as around mixed-use local centres and public transport nodes. To support the economic and social success of our towns and cities, including sustaining public transport and facilities, urban growth and regeneration should increase the population density of our towns and cities’.</p> <p>Policy 6 – Town Centre First</p>	<p>the view that the Strategic Site’s designation as a residential settlement in the settlement hierarchy is inappropriate and should be directed to the Principal Towns and Local Centres.</p> <p>The Welsh Government position on this does not consider the whole picture of how the proposed level of growth is to be accommodated during the plan period and where the growth will be located. Welsh Government has not taken into account the fact that the mid-valleys corridor is where the majority of the county borough’s population live and work, nor does it address the need to consider east west connectivity/modal shift rather than merely north south connectivity/modal shift. Further, WG does not consider how the proposed growth over the plan period should be delivered; specifically whether that should be via small scale incremental sites that increase the pressure on existing infrastructure and lack the development capital to fully address their impacts, or indeed make significant contributions towards modal shift; or alternatively via growth on a larger site that affords the opportunities to address issues across a wider area than just the site <b>AND</b> deliver meaningful modal shift through a range of measures that the development quantum will provide. Consequently, Welsh Government’s argument that significant modal shift can only be delivered by locating development close to Principal Towns, Local centres and Metro transport nodes is flawed, as it fails to take account of the fact that sites that are located in these areas will be allocated in the plan and the additional measures that larger sites can deliver that will actually also contribute to the delivery of a modal shift.</p> <p><u>Future Wales Policy 1</u></p> <p>It should be noted that Welsh Government <b>has not objected</b> to the proposed level of growth identified for the Preferred Strategy and, therefore, <u>it is reasonable to consider that Welsh Government agrees with the proposed level of growth proposed for the plan period.</u></p>	
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<p>Town Centres should be the focus for growth and regeneration. A key aim of this policy is that new development should be on sites in areas that support active travel, public transport and reduce the need to travel. The proposed strategic site is one that is road/car dominated.</p> <p>.</p> <p>Policy 12 – Regional Connectivity / Policy 36 – South-East Metro</p> <p>Growth areas should be planned in a manner to maximise opportunities arising from investment in public transport, including identifying opportunities for higher density, mixed-use and car-free development around metro stations. A key priority is to reduce the need to travel, particularly by private vehicles, and support a modal shift to walking, cycling and public transport. The sustainable transport hierarchy in Planning Policy Wales, which prioritises active travel and public</p>	<p>The Strategic Site is sustainably located, as it is well located to multiple centres, transport nodes and employment centres as a consequence of its strategic location in the mid valleys area. Consequently, the site is very well placed to deliver sustainable development, promote modal shift, promote active travel and deliver strategic placemaking. The fact that the proposed development is in an identified residential settlement does not mean that these outcomes cannot be delivered.</p> <p>The Council has concerns over the proposed Masterplan layout in terms of placemaking and would collaborate with the promoters to deliver a layout of development that delivers local placemaking outcomes. In respect of strategic placemaking it is clear that the site’s location can deliver this better than any other site that the Council is considering due to the scale of the site.</p> <p><u>Future Wales Policy 6</u></p> <p>It is accepted that growth, where possible, should be focussed on the Principal towns and Local Centres as the principal service centres in the county borough. However, the primary employment sites are located away from these centres, for example the principal employment centre for the County Borough is at Oakdale/Penyfan, which is not close to any Principal or Local centres and suffers from poor public transport access. The Strategic Site is within short cycling distance to this employment centre, making it a better location for modal shift in terms of employment needs. This reinforces the Council’s position that whilst locating sites in town centres is preferable, some sites outside of these centres are better located to access a wider range of services and facilities, even though they may be located in settlements that are mainly residential in nature. The Council’s view is that the Strategic Site is one such location.</p> <p>It should also be noted that there are only a limited number of town centre sites available, and which have been proposed through the Candidate Sites process. Some of these sites have been ruled out for</p>	
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<p>transport, is a fundamental Welsh Government principle that underpins Future Wales.</p>	<p>appropriate reasons as are outlined in PS10 - Candidate Site Assessment Summary. At the current stage in plan preparation and site assessment, existing commitments and suitable proposed town centre sites can deliver approximately 3,500 dwellings, which equates to 52% of the total housing requirement for the plan, and 48% of the housing provision. It is clear, therefore that sites located outside of town centres will be required to meet the shortfall and therefore a significant element of growth will need to be in other settlements, i.e. in settlements that have been identified as residential settlements in the settlement hierarchy.</p> <p>The settlement hierarchy sets out the primary role of the settlement in the overall settlement pattern. It does not set out the specific role that each settlement plays, as that will be dependent upon the settlements location and suitability to accommodate growth, both of which is set out in PS3 - Settlement Role, Function and Sustainability Analysis. It is wrong to take the categorisation of residential settlement to mean that a settlement should not be the subject of appropriate growth, which is the position Welsh Government is adopting.</p> <p>As outlined above, the Council refutes Welsh Government's contention that the Strategic Site is a car dominated development, which seems to stem from the fact that the access road will also provide relief to the significant congestion on the Maesycwmmmer stretch of the A472, as this site is the only site that the Council is considering that can deliver significant modal shift through its planned development at the outset.</p> <p><u>Future Wales Policies 12 and 36</u></p> <p>The Council agrees that the growth associated with the 2RLDP should be focussed to maximise the opportunities and benefits of the Metro system and the investment that has been put into it. Whilst locating development close to key Metro nodes will assist in delivering this, it is also the case that opportunities also exist away from the immediate Node</p>	
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	<p>locations, and these should not be overlooked as they can contribute significantly to modal shift and sustainable transport both now and in the future.</p> <p>The Strategic Site is located on the mid-valleys strategic route, the A472, which is the only cross-valley east-west route within the valleys themselves. The other east-west routes are the M4 corridor to the south of the valleys and the A465 Heads of the Valleys road to the north. Consequently, the A472 corridor is a fundamental element in the Metro system and is currently being investigated for a Metro improvement to provide a mid-valley rapid route across the south Wales valleys. Maesycwmmmer has been identified as a major congestion point on this key strategic route since 1996, and remains a significant congestion point today. Improvements to the highway infrastructure at Maesycwmmmer, to alleviate congestion, would not only benefit the community of Maesycwmmmer, but will also be a fundamental benefit to the provision of Metro services along the A472 route. The access road for the Strategic Site will provide an alternative route to the current A472 for easterly and southerly moving traffic, relieving congestion on the A472. The purpose of any improvement through the site would be to provide an alternative route for traffic, not to increase highway capacity. The access road itself would be designed appropriately for access to the Strategic Site whilst still serving the purpose of an alternative route with placemaking principles at its heart.</p> <p>The Council's view is that the scale of development on the Strategic Site will provide services and facilities that will actually drive modal shift in a way that the site will realise a level of modal shift far in excess of any site purely located close to a town centre or Metro node. The promoters of the site prepared and published a Transport Vision Statement, as part of a raft of evidence to support the allocation of the site, and this report set out a number of measures aimed at delivering modal shift and increased active travel. These measures include:</p>	
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	<ul style="list-style-type: none"><li>• Site planned at a walkable scale;</li><li>• Co-working and close to home working spaces;</li><li>• Integrating existing and delivering new active travel routes to major destinations;</li><li>• Bus services through the development;</li><li>• Reduced parking throughout the scheme;</li><li>• Electric charging points;</li><li>• Mobility Hub providing services such as:<ul style="list-style-type: none"><li>○ Community concierge providing information and services;</li><li>○ Cycle and e-cycle hire;</li><li>○ Cycle repair;</li><li>○ Car Club;</li><li>○ Demand Responsive Transport;</li><li>○ Travel Planning and travel incentives.</li></ul></li></ul> <p>The measures identified are active interventions that will seek to drive the change to sustainable transport rather than rely on the passive impact of being located close to a Town Centre or Metro Node.</p> <p>A principal element of the objection in respect of Policies 12 and 36 is that the proposed development will be “car dominated”. The Council refutes that position as the site will deliver demonstrable modal shift through intervention as well as relieve congestion to facilitate the provision of an A472 rapid transit route across the mid-valleys’ corridor. It should also be noted that Welsh Government’s own Transport Strategy “Llwybr Newydd” sets a modal shift target of only 40% by 2040, which means that car traffic will continue to be the dominant mode of transport</p>	
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	<p>beyond 2040, a position which seems at odds with the objection to the Strategic Site that seeks to deliver higher levels of modal shift and active travel as well as facilitating major Metro improvements.</p> <p>Overall, this Objection by Welsh Government is considered to be an unsubstantiated, inaccurate representation of the Strategic Site and has not taken account of the reasons for identifying the Strategic Site nor the evidence that has been prepared and published by the promoters and the Council to justify the site's allocation.</p> <p>However, whilst the objection is not agreed it has been framed as a conformity objection and as such raises a significant risk to the continued preparation of the 2RLDP. Consequently, consideration needs to be given to how the Council moves on from this position in seeking to deliver an adopted development plan.</p>	
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### Regional Collaboration

Objections raised	Council Response	Recommendation
<p>Further evidence is required to understand how the Preferred Strategy has been developed within the wider regional context and how it will promote and enhance Cardiff, Newport and the Valleys' strategic role, and ensure key investment decisions support the National Growth Area and the wider region. Future Wales brings a new perspective that all LDPs</p>	<p>Paragraphs 2.36 to 2.38 of the Preferred Strategy sets out how the Council has collaborated with the other nine authorities in the CCR in preparing its Pre-Deposit Plan and the mechanisms used to do this.</p> <p>It is accepted that these paragraphs do not specifically address the issue of defining the level of growth for the County Borough. However, throughout the preparation of the Pre-Deposit Plan the Council has used a series of engagement events to get input from key stakeholders on the strategy as it was developed. All authorities in the CCR were invited onto these meetings to input into the process and inform the plan strategy, which included consideration of growth options and the</p>	<p>SEWPOS and SEWSPG in consultation with the CJC and WG agree the scope of the work to be prepared in respect of regional growth and migration and commission this work to feed into the emerging plan.</p>

<p>have to embrace, that of how each LDP sits within the region as a whole and the relationship to other LDPs, in essence a strategic approach to planning in advance of the formal commencement of SDPs. This principle applies not only to the overall scale of growth, but also to any strategic site(s) identified. In this instance how does the growth level relate to other LDPs in the region, why that level, is a strategic site needed and is the one identified in the preferred strategy the most appropriate both for the region and the plan?</p> <p>The absence of evidence demonstrating that a regional approach has been followed and the explanation of how the wider region has been involved in shaping and agreeing the choices made is of significant concern and the consequences the decisions taken by Caerphilly may have for other LDPs and/or future SDPs. Whilst the further detail in the table at Appendix 1 of the Preferred Strategy is noted,</p>	<p>identification of a strategic site. As such the other authorities in the CCR have been party to the formation and preparation of the plan.</p> <p>Welsh Government contends that the growth in the County Borough should be developed from a regional approach that considers how the proposed level of growth sits within the region in respect of its impacts and how the growth will be delivered. In meetings with Welsh Government Officers it has been stated that the growth for each authority should be borne from a regional assessment of growth, an equivalent to an SDP consideration of growth across the region.</p> <p>It should be noted, however, that Future Wales does not set this out in any of its policies, deferring the regional approach to the Corporate Joint Committee for the Region via the Strategic Development Plan (SDP). Policy 33 addresses the National Growth Area in South East Wales and advises “In accordance with Future Wales’ spatial strategy, growth in the South East region should primarily be focused on Cardiff, Newport and the Valleys. Policy 1 is the overarching framework for where development and growth will be focused on each region.” In addition Policy 19 identifies that the SDP is responsible for setting the spatial strategy that will address the concept of regional growth and its interactions. It should be noted that at no point is reference made to the need for local authorities to act regionally, or to prepare a regional assessment of growth.</p> <p>In meetings with Welsh Government to clarify the comments, Welsh Government has advised that it would be raising similar issues with other local authorities across the CCR. However, the Monmouthshire Preferred Strategy was the subject of consultation (5 December 2022 to 30 January 2023) shortly after the consultation on Caerphilly’s Pre-Deposit Plan and Welsh Government raised no objections to the Monmouthshire level of growth, despite the absence of the regional assessment. Welsh Government’s explanation for this was that the Monmouthshire plan used an affordable housing basis for its growth.</p>	
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<p>section 2.24 of the Preferred Strategy does not identify policies 33 and 36 as being of particular importance. The description of regional collaboration in paragraphs 2.36 to 2.38 is limited.</p>	<p>This is in conflict with the comments raised to the Pre-Deposit Plan that the plan should indicate “how the Preferred Strategy <b><u>has been developed within the wider regional context</u></b> and how it will promote and enhance Cardiff, Newport and the Valleys’ strategic role, and ensure key investment.” The conflicting approaches makes it difficult to understand how Caerphilly can genuinely develop a level of growth based upon a regional approach, when other plans have been agreed with levels of growth that are not subject to the same requirement.</p> <p>There are significant concerns over the Welsh Government’s requirement to prepare a regional assessment of growth including:</p> <ul style="list-style-type: none"> <li>• Local authorities do not have the powers to prepare regional work (the role is clearly set out in Future Wales Policy 19 as an SDP function, not an LDP one).</li> <li>• There is no mechanism for resolving conflicts which means this work will need to be based upon agreement which will be impossible if the findings of the assessment are prejudicial to any constituent authority.</li> <li>• There is no guarantee that any assessment prepared by local authorities will be endorsed by the Corporate Joint Committee (CJC) potentially giving rise to conformity objections to all emerging plans at a regional level.</li> </ul> <p>As a result of the Welsh Government objection, and the statement that other authorities would be the subject to similar requirements, the South East Wales Planning Officer’s Society (SEWPOS) and the South East Wales Strategic Planning Group (SEWSPG), together with the CCR as the CJC, are in active discussion with WG to understand the scope of any likely commission for an assessment of regional growth and migration to inform emerging development plans. If the scope can be</p>	
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	agreed, then this is likely to be a lengthy commission given the nature of the work and is unlikely to be delivered before the end of the year.	
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## Resilient Ecological Networks and Green Infrastructure

Objections raised	Council Response	Recommendation
<p>At present, it is considered that the Preferred Strategy takes a pre-Future Wales LDP approach to ecological and biodiversity issues. The National and Regional issues set out in the Preferred Strategy should include the nature emergency, which has been declared by the Senedd and which is integral to responding to the climate emergency. The omission of Future Wales Policy 9 from the list of policies identified as being of importance at 2.24 is a significant omission. Future Wales Policy 9 should be a key policy consideration in the preparation of Preferred Strategy Policy 1 'The Level of</p>	<p>The lack of reference to Future Wales Policy 9 is an omission from the LDP and should be referenced as part of the overall policy framework.</p> <p>Whilst the Pre-Deposit Plan does not include reference to Future Wales Policy 9, this does not mean that the Preferred Strategy has been prepared without taking the policy into full account.</p> <p>The Council recognises the importance of the natural environment, green infrastructure and securing sustainable growth for the future. The Council declared a climate emergency in June 2019 and committed to fundamentally change the way in which it conducts its day-to-day business. The 2RLDP is a key mechanism for implementing this strategy in land use terms to the benefit and well-being of its residents and future generations. The Council also has a duty under Section 6 of the Environment Act (Wales) to protect, maintain and enhance its biodiversity assets, reversing decline and establishing resilient ecological systems. These have been at the heart of the preparation of the plan from its inception and has been an integral part of the development of the strategy and will continue to be a fundamental consideration in plan preparation.</p> <p>In November 2020, the Council adopted its Green Infrastructure Strategy (GIS), which identified areas of multifunctional importance, value, and the need for enhancement. This has been a fundamental tool in developing</p>	<p>The plan be amended by the inclusion of references to Future Wales Policy 9 in paragraph 2.24.</p> <p>A new Evidence Base Paper be prepared to set out how the preparation of the plan has been undertaken through a nature-based approach and how the Council's Climate Emergency and Duties are being met.</p>

<p>Growth for the RLDP’, Policy 4 ‘Areas of Growth’ and all relevant strategic policies.</p> <p>In line with Future Wales Policy 9, the Caerphilly Preferred Strategy should emerge from a nature-based approach, that takes as its starting point the need to take action to maintain and enhance biodiversity (to provide a net benefit) and uses a nature-based approach as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. The imperative of achieving resilient ecological networks and effective green infrastructure should shape strategic and spatial choices at all scales. It is considered that more work is required to demonstrate how this has been done to address the climate emergency, reverse biodiversity decline and enable communities to benefit from more sustainable forms of managing natural resources</p>	<p>the Preferred Strategy and in considering where growth and development can be delivered to deliver the Council’s duties and requirements. The Candidate Sites assessment process has taken account of the GIS, along with ecological, landscape, climate change, placemaking, flood risk and environmental input from across the Council’s services. Through this assessment, sites will be identified that have fully taken account of the Policy 9 approach and which can deliver positive enhancement and outcomes in respect of these issues. It is accepted that the approach has not been fully drawn out in the evidence base, but as a major cross-cutting consideration the process it is embedded within a wide range of the evidence base.</p> <p>The 2RLDP will build on this significantly and will seek to implement a robust policy framework to ensure that sites of ecological importance are safeguarded, and all development proposals provide opportunities for green infrastructure enhancement and promote climate change adaptation and mitigation.</p> <p>The Council has commenced work on its Green Infrastructure Assessment (GIA), which will inform the deposit stage of the 2RLDP. The GIA draws on the evidence base of the South East Wales Area Statement prepared by Natural Resources Wales and the CCBC Green Infrastructure Strategy, adopted in 2020.</p> <p>The scope of the GIA is to provide an updated technical evidence base for the 2RLDP, by identifying existing green and blue infrastructure assets such as biodiversity, green spaces, leisure, and recreational facilities whilst also identifying and assessing opportunities to enhance health and well-being, ecological connectivity, and a thriving blue environment. Whilst this work is progressing, steps have been taken to ensure that sites assessed as part of the candidate sites process have due regard for areas of multifunctional importance. Candidate sites initially submitted as part of the plan process have been considered and assessed by our countryside and ecology teams, supported by the green infrastructure</p>	
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	<p>strategy. Where concerns have been raised regarding significant ecological issues, sites have initially been ruled out for further consideration.</p> <p>Whilst the Council is content that the plan has been prepared from a nature-based approach, it is accepted that this could be more directly referenced through the provision of an Evidence Base Paper that will demonstrate how this has been followed.</p>	
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## ANNEX 2: COMMENTS ON THE PRE-DEPOSIT PLAN (PREFERRED STRATEGY) AND SUPPORTING INFORMATION

In total 327 representations were made in respect of the Preferred Strategy and its supporting information.

Of those, 100 were in support and 227 raised an objection. Appendix 2 lists the representor and representation numbers.

A response to the issues raised is provided under each part of the Preferred Strategy and Supporting Information.

### Chapter 1 Introduction

Objections raised	Council Response	Recommendation
<p>Include reference to the Regional Technical Statement (RTS), Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs) and Statement of Sub-Regional Collaboration (SSRC) within the Glossary.</p>	<p>It is not considered that these documents are applicable to the broad, strategic context set out in relation to the Preferred Strategy. However, it is accepted that they are of primary importance to the formulation of the more detailed minerals policy that will be included within the Deposit Plan.</p>	<p>Comments are noted. It is not considered that reference to these documents needs to be made within the Preferred Strategy. However, they should be included within the corresponding section of the Deposit Plan.</p>

**Future Wales Policy 17 Renewable and Low Carbon Energy and Associated Infrastructure**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Should include a requirement that no homes are to be built, or properties refurbished, with fossil fuel heating systems.</p>	<p>It is agreed that new buildings should be moving away from fossil fuel heating systems. However these measures are generally set out in Building Regulations that provide a more concrete foundation from which to enforce such measures than development plans. The Deposit Plan will include a detailed policy framework that will include policies that will seek to encourage the use of renewable energy and its technologies.</p>	<p>No amendment is required.</p>

**Future Wales Policy 18 Renewable and Low Carbon Energy developments of National Significance**

Objections raised	Council Response	Recommendation
<p>Objection to onshore wind turbines.</p>	<p>National policy in Wales supports the generation of energy from renewable resources, including onshore wind power. Policy 17 of Future Wales states: “The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.”. A significant proportion of the County Borough has been identified as forming part of a Pre-Assessed Area for Wind Energy.</p> <p>Future Wales policy 17 states “In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas.” Consequently it is a national policy position to promote onshore wind energy and with the Pre-Defined Areas there is a presumption in favour of it. Consequently, the Objectives are correct in referencing the need for wind energy generation.</p>	<p>No amendment is required.</p>

## Chapter 2 National, Regional and Local Context

Objections raised	Council Response	Recommendation
Set the context of the plan in relation to Regional Technical Statement (RTS), Technical Advice Notes (TANs), Minerals Technical Advice Notes (MTANs) and Statement of Sub-Regional Collaboration (SSRC) requirements.	The national context set out the high level, overarching legislative and policy framework within which the Preferred Strategy has been prepared, including cross-cutting matters such as environmental protection and well-being. From a planning perspective, Planning Policy Wales (PPW) and Future Wales are relevant here and are explicitly mentioned. While the RTS, TANs, MTANs and SSCR are important considerations in relation to their respective topics, they are understood to exist within, and complement, the national policy framework set by PPW.	It is not considered that reference to the RTS, TANs, MTANs and SSCR needs to be made within the Preferred Strategy. However, they should be included within the corresponding section of the Deposit Plan.
Needs to mention health benefits of active travel.	The Preferred Strategy is consistent with national policy (PPW, especially), which sets out the health benefits of active travel. The Preferred Strategy need not repeat this.	No amendment is required.
If the A472 and A465 are 'strategic highway networks', the A468 and the A469 should be treated as such, too.	The Strategic Highway Network comprises high quality roads that are built to appropriate highway design standards, providing the main routes between centres of population and linking with the trunk road network. Figures 3 and 5 within the Preferred Strategy identify the A465 and A472 as the 'Strategic Highway Network'. The A467, A468, A469 and A4048 should also be identified as part of the Strategic Highway Network.	The A465, A472, A467, A468, A469 and A4048 should be identified as part of the Strategic Highway Network.

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<p>Objection to 'social heart, commercial head' approach.</p>	<p>The Council's 'social heart, commercial head' approach recognises the Council's commitment to public service and the needs of [its] citizens, but also demonstrates its desire to explore commercial opportunities where appropriate, to generate additional income to reinvest in services to help them remain resilient. The Council will find and articulate the right balance between our public sector ethos and commercial practices. The 'commercial head' part does not involve the largescale outsourcing of services but will instead focus on a more business-like approach to take advantage of commercial opportunities for the services that we provide.</p>	<p>No amendment is required.</p>
<p>Preferred Strategy should put more emphasis on planting trees and growing food.</p>	<p>The PS sets out broad principles only. Paragraph 7.19 of the PS refers to the 'biodiversity duty' and the 'duty to deliver sustainable development', both of which will influence 2RLDP policies and the development proposals assessed under those policies. The eventual 2RLDP may have policies, or parts of policies, on trees and landscaping. Developers will be expected to protect healthy trees and, where possible, improve their proposals with new trees and hedges.</p> <p>The growing of food is not a topic that easily fits into a development plan. The assessment of candidate sites sought to protect 'best and most versatile' (BMV) agricultural land, and the 2RLDP may include a policy on the same topic. Agricultural undertakings are, to a degree, determined by permitted development regulations.</p>	<p>No amendment is required.</p>
<p>Mass housebuilding (especially on strategic site) at odds with declining birth rate and with policies on climate change and decarbonisation.</p>	<p>The evidence base in respect of the 2RLDP's proposed level of growth, and the associated housing land requirement, is set out in PS4 - Population and Housing Growth Options. The issue of climate change and its implications are a key consideration, and mitigating for climate change effects as well as reducing emissions contributing toward climate change are fundamental elements in the development strategy. The Preferred Strategy contains Policy PS6: Climate Change which aims to ensure all development proposals make a positive contribution towards addressing the causes of, and adapting to the impacts of, climate change.</p>	<p>No amendment is required.</p>

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<p>Complex legislative and regulatory framework. Concern: end up with an LDP that meets legislative requirements but makes 'little objective sense' to the population.</p>	<p>The 2RLDP is, by its very nature, a comprehensive spatial planning strategy, underpinned by a wide-ranging evidence base. It must be prepared in the context of current national policy and legislation to ensure the plan is effective, deliverable and contributes to placemaking, as set out in PPW. An Easy Read version of the Preferred Strategy was prepared and published as part of the consultation for ease of reference. All documents were available in libraries and at Tredomen Business &amp; Technology Centre and officers were available at mobile exhibitions as well as at the Council Offices via appointment. Additionally, officers were available via the LDP hotline to offer advice and to explain the Preferred Strategy and its supporting evidence.</p>	<p>No amendment is required.</p>
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## Chapter 3 Key Land Use Issues

### Economic Issues

Objections raised	Council Response	Recommendation
Place mineral extraction under 'Economic Issues' (rather than Environmental) for consistency.	<p>It is accepted that mineral extraction is an economic function with clear (albeit temporary) environmental impacts. The issues set out in the Preferred Strategy have been categorised as economic, environmental, social or cultural in accordance with the four elements of sustainable development set out by PPW. However, there will inevitably be some overlap, with many issues having potential impacts in more than one of these categories.</p> <p>It is not considered that the particular category into which an issue has been placed will make a difference to the policy framework set out for a particular topic. Of greater importance is the understanding of the relationship between the different issues, and between economic, environmental, social and cultural factors.</p>	No amendment is required.

### Social Issues

Objections raised	Council Response	Recommendation
Loss of character of Caerphilly town centre, due to the loss of independent shops and lack of investment (SO3).	The 2RLDP will contain, as the adopted LDP contains, policies relating to the suitability or otherwise of particular uses within town centre locations. To this end, a sequential test will be formulated which will regulate proposals for town centre development and which will operate in tandem with any site allocations that may be included, as well as the principal town centre boundaries. These will be set out within the Deposit Plan. In addition, the Council's Regeneration Service continues to progress the Caerphilly Town 2035 proposals in conjunction with stakeholders. Although a distinct process, these form part of the 2RLDP evidence base, and regard will be had to them in terms of policy formulation.	No amendment is required.



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	<p>Importantly, Future Wales forms part of the development plan against which applications for planning permission are determined, and this contains a ‘town centre first’ policy which requires that significant new retail development, as well as complementary uses such as commercial leisure, service provision and housing (where appropriate) should be located within town centres.</p>	
<p>Preferred Strategy should put more emphasis on, and include more detail about, health-related issues.</p>	<p>The Preferred Strategy has been prepared within the context of Planning Policy Wales, which, in turn, has its foundation in the seven well-being goals set out by the Well-Being of Future Generations Act, one of which is “a healthier Wales”. Therefore, human health forms an important consideration in terms of national planning policy, as well as <i>Future Wales</i> which is the national tier of the development plan system, and with which the 2RLDP must be in general conformity.</p> <p>Plan preparation is being undertaken in parallel with the Integrated Sustainability Appraisal (ISA), which ensures that the 2RLDP’s policies and proposals are assessed for likely health impacts. As part of this process, policies and proposals are reviewed within the context of applicable legislation as well as national policy relating to planning and other relevant areas. Further, the 2RLDP has been undertaken with input from relevant stakeholders, including the health board, and the Deposit Plan will, where necessary and appropriate, propose site allocations for new health facilities and set out policies for the protection of existing ones.</p>	<p>No amendment is required.</p>

## Environmental Issues

Comments in Support	Council Response
Support for summary.	The comments made in support are noted.

Objections raised	Council Response	Recommendation
<p>The following amendment is suggested to Environmental Issue EN9 to give an accurate reflection of PPW:</p> <p>"It is a requirement that the Council maintains an adequate supply of minerals and provides positively for the safeguarding and working of mineral resources and infrastructure. For aggregates a minimum 10-year land bank will be maintained to ensure its future contribution to the national, regional and local aggregates supply. The 2RLDP will need to ensure sufficient reserves are permitted to maintain</p>	<p>The rationale given for the amendments is to provide an accurate reflection of PPW i.e. to explicitly state that maintenance of an adequate supply of minerals is required, along with contribution to the national, regional and local aggregates supply. However, the comment concedes that the means of ensuring supply is the maintenance of a 10-year land bank, which the text already refers to.</p> <p>It is not considered that the text already in place is contrary to the provisions of PPW and indeed, making specific reference to its requirements would merely duplicate National Planning Policy. Policy PS22 of the Preferred Strategy has been prepared within the context of PPW, and the policy framework to be set out within the Deposit Plan will be prepared within the context of the RTS 2<sup>nd</sup> Review and relevant TANs and MTANs in addition to this.</p>	<p>No amendment is required.</p>

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<p>the land bank throughout and at the end of the plan period, whilst minimising the adverse impacts of minerals activity on the landscape."</p>		
<p>Need to find ways to address wider environmental issues, large developments such as the strategic site contradicts environmental points, town centre first focus and road building.</p>	<p>The 2RLDP is being prepared within the context of National Planning Policy and applicable, related areas of legislation such as the Well-Being of Future Generations Act and is required to be in general conformity with Future Wales. This will ensure that its policies and proposals are not in conflict with national environmental priorities, and that social, economic, cultural and environmental issues are properly considered.</p> <p>Through the ISA process, the 2RLDP is also subject to strategic environmental assessment, which ensures that the likely environmental effects of the plan are considered and taken into account in an iterative fashion.</p> <p>The Strategic Site has been, and will continue to be, the subject of detailed assessment in respect of all of its impacts and will address all adverse impacts as part of the overall masterplan for the site. The Site is considered to be one of the most sustainably located sites being considered for the 2RLDP, as it is within walking distance of a railway station and cycling distance to two Principal Town Centres and 1 Local Centre and 2 railway stations, one on the Rhymney Valley rail line and one on the Ebbw Vale rail line.</p>	<p>No amendment is required.</p>
<p>Failure to outline the importance of tackling the climate emergency, the protection of ecological areas and connectivity, protected species and cumulative impact.</p> <p>The Preferred Strategy notes importance of</p>	<p>The issue of climate change and its implications are a key consideration for the 2RLDP, and mitigating for climate change effects as well as reducing emissions contributing toward climate change are fundamental elements in the development strategy. The Preferred Strategy contains Policy PS6: Climate Change which aims to ensure all development proposals make a positive contribution towards addressing the causes of, and adapting to the impacts of, climate change.</p> <p>The preparation of the Preferred Strategy has been undertaken with the need to address the Nature Emergency as a fundamental part of the overall process, in</p>	<p>No amendment is required.</p>

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<p>climate change but does not go into the detail of 'how' it can be mitigated against and tackled, there needs to be more practical steps included to encourage confidence in the plan.</p>	<p>a similar way that placemaking, the need to address climate change and the climate emergency and the biodiversity duty and socio-economic duties have been.</p> <p>The promotion of the Nature Emergency priorities (Nature based solutions, Resource efficiency/renewable energy and a place-based approach) are an integral part of the preparation, consideration and assessment of the Preferred Strategy. For example the assessment of Candidate Sites has taken account of ecological and biodiversity issues, whilst the consideration of areas for growth and the functional and sustainability analysis of settlements has been informed by the Council's Green Infrastructure Assessment.</p>	
<p>Objection to development on green field sites.</p> <p>No map of brownfield land within County Borough which encourages green field release for development.</p> <p>Green spaces important in the fight against climate change.</p>	<p>Brownfield land contains some of the most important and diverse habitats that we have in the County Borough. Conversely a significant amount of the greenfield land surrounding our settlements is comprised of improved agricultural grassland which has little if any importance for nature conservation or biodiversity, with the exception of field boundaries, where they are comprised of stone walls or hedgerows (and these can be maintained and enhanced as part of development proposals). To assume a general presumption against development on greenfield land would, therefore, lead to the loss of some of the most important and diverse brownfield habitats and preserve greenfield sites with much less importance for biodiversity. This position does not deliver sustainable development.</p> <p>While PPW is clear that previously developed land should be utilised in preference to greenfield (paragraph 3.55), it also states that not all such sites will be suitable for redevelopment due to contamination, its unsustainable location or the potential for constraints to be imposed upon existing, adjacent activities. The Adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, and those sites that remain fall into this category. Sites proposed for inclusion within the 2RLDP will be assessed in terms of deliverability and viability, which are important considerations in the site selection process and these considerations are factored into candidate site assessments.</p>	<p>No amendment is required.</p>

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	<p>Green and open spaces are essential for health and well-being as well as providing benefits for sport, recreation, and community use. The 2RLDP will ensure that all residents have access to green and open spaces and will protect valuable open spaces from development where appropriate.</p>	
<p>Need for public transport investment and bus improved services.</p>	<p>The 2RLDP plan-period will coincide with the implementation of the Transport for Wales (TfW) Metro. TfW have made a significant investment to upgrade existing rail infrastructure throughout the County Borough and have already made upgrades to rail rolling stock, with new trains recently commencing service on the Rhymney Valley Line. The 2RLDP will explore the implementation of new rail stations at Nelson and Crumlin throughout the plan period and will safeguard former rail routes for future opportunities. Bus services will improve substantially with the implementation of the Metro and the Council will work closely with operators to ensure that residents remain connected to their communities and have access to a public transport network that meets their needs. For additional reference PS11 Transport Background Evidence Paper contains more specific detail regarding public transport services and active travel plans as part of the 2RLDP.</p>	<p>No amendment is required.</p>

## Cultural Issues

<b>Comments in Support</b>	<b>Council Response</b>
Support for heritage included as key land use issue. Preservation of former railway lines for active travel routes, enhance them to display historical role and heritage.	The comments made in support are noted.

## Chapter 4 The Strategic Vision, Aims and Objectives

### The Vision

Comments in Support	Council Response
<p>The Vision includes external factors like Brexit and Covid-19 that have an impact on economic growth and reference the Cardiff Capital Region that accords with Future Wales' National Growth Area.</p> <p>Broadly supportive of the vision for the County Borough.</p> <p>The Vision is broadly supported insofar as it is drafted as a standalone statement, but it is critical that the policies (and their implementation) are just as positive.</p> <p>Supportive of the overall Vision for the 2RLDP contained both within this policy and as outlined in principle by the wider policies of the plan.</p>	<p>The comments made in support are noted.</p>

Objections raised	Council Response	Recommendation
<p>Does not address the socio-economic issues in the north of the County Borough.</p>	<p>The socio-economic issues associated with the Heads of the Valleys Regeneration Area (HOVRA) are an important consideration for the policy framework. In considering the strategy to be used for the emerging 2RLDP the Council considered 6 alternatives, one of which was to focus development in the HOVRA to stimulate growth and regeneration in the area. However, it is a requirement that the Council can demonstrate that the sites it allocates in the plan are viable and deliverable. As considered in PS1 - Strategic Options Assessment, Option 2 – Heads of the Valleys Regeneration Area (HOVRA) Focus, the disadvantages note that low land values and house prices in the area mean that there are significant issues in respect of its viability and deliverability, and it would not be possible to allocate significant land in this area and demonstrate that it can be delivered. The plan acknowledges this and whilst it would not be possible to include sites whose viability and deliverability is questionable within the formal land requirements; sites can be identified in</p>	<p>No amendment is required.</p>

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	<p>this area as desire sites that would not form part of the overall land requirement calculations. Consequently, whilst the Preferred Strategy does not specifically direct development to the HOVRA the Deposit Plan will allocate sites in this where possible to seek to address this issue.</p>	
<p>No evidence to support the level of housing. Given the previous delivery constraints we believe that a further sentence / paragraph should be added to the Vision which states that housing needs (both private and affordable) will be met.</p>	<p>The level of housing growth in the plan was identified through the engagement process. The evidence and considerations associated with this are set out in detail in PS4 - Population and Housing Growth Options.  The Vision, as presently worded, explicitly references the delivery of market and affordable housing. It is not, therefore, considered necessary to amend this.</p>	<p>No amendment is required.</p>
<p>Specific reference is needed to increased levels of economic and housing growth to deliver the National Growth Area as defined by Policy 33 of Future Wales.</p>	<p>The fact that the County Borough is within the Future Wales National Growth Area in South East Wales is considered within PS1 - Strategy Options Assessment and the plan itself (e.g. Para 2.24 that sets out the Future Wales Policies, Key Objective 1). It is not considered that further reference to this issue would add anything further to the Preferred Strategy.</p>	<p>No amendment is required.</p>
<p>Make reference to the impact of the environment in helping to improve health and wellbeing.</p>	<p>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 Vision sets out the relationship between the environment and health and wellbeing; “Develop and enhance the blue and green infrastructure across the County Borough by incorporating it in the design of development and promoting the protection and enhancement of important areas for both nature</p>	<p>No amendment is required.</p>



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	<p>conservation and the health and well-being of residents”. Whilst this sets out the relationship between health and the environment, the Aims and Objectives set out how this is to be addressed and delivered.</p>	
<p>The plan does not mention the presumption in favour of sustainable development which is a key theme of PPW11. The plan should be amended to include this.</p> <p>It is critical that the presumption in favour of sustainable development is clearly referenced, and indeed followed throughout the LDP.</p>	<p>Paragraph 2.6 of the Preferred Strategy Plan addresses the issue of the duty to deliver sustainable development set out in the Well-Being of Future Generations Act and the requirements for local authorities to “act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs”. The presumption in favour of sustainable development stems from this sustainable development duty. As such this issue is covered in the Preferred Strategy.</p>	<p>No amendment is required.</p>
<p>No proper plan for coping with changes in global temperatures.</p> <p>The vision lacks the emphasis on tackling climate change with no reference to a lower carbon emitting County Borough.</p> <p>Proposing development uses greenfield land and removes trees contrary to PPW and the climate emergency.</p>	<p>Both the Council and the Senedd have declared ‘climate emergencies’, thereby recognising that there is a major issue that needs to be addressed, and that will impact on the formulation of public policy across a number of areas. Allied to this, there are a number of duties on the Council that address this issue, particularly the sustainable development duty and the biodiversity duty both of which are an integral part of the plan and its preparation.</p> <p>The representors have linked greenfield development with adverse impacts in respect of climate change, but this is an incorrect assumption. The Council is required to ensure the social, economic and cultural well-being of the County Borough, as well as the environmental well-being and as such the Council needs to ensure sufficient homes and jobs have been provided for its residents. Land is required to ensure the requirements from the Preferred Strategy projections are met. However, development of a greenfield site can provide climate change benefits, e.g. areas within the County Borough are currently at risk from surface water flooding from greenfield areas. Developing such areas</p>	<p>No amendment is required.</p>

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	<p>can remove the flood risk by adopting positive sustainable drainage that can significantly lower the amount of water that will be leaving the site, to levels well below the current run-off rate. In addition, it should be noted that a significant amount of greenfield land is improved agricultural land that has little, if any, biodiversity value. The biodiversity duty requires the Council to enhance biodiversity when considering sustainable development and improvements to such areas would have positive impacts for both biodiversity and climate change. Whilst it is recognised that sites with biodiversity and climate change importance should not be developed wherever possible, the broad assertion that greenfield development is bad for climate change is a fallacy.</p>	
<p>No map of brownfield sites, only greenfield Candidate Sites.</p>	<p>It is a requirement for the Council to give landowners the opportunity to propose land within their legal interest for consideration for allocation in the emerging plan and these sites are called Candidate Sites. It is also a requirement that the Council prepares a register of Candidate Sites for the Preferred Strategy Consultation. This register lists the submitted sites and the results of initial investigations on whether the sites should be considered further for allocation in the plan. It should be noted that the Council has no control over the sites that are submitted as part of this process and the fact that the majority of sites are greenfield sites is purely a reflection of the sites that have been submitted and the land available for development in the county borough.</p> <p>The Council has undertaken an initial assessment of brownfield land in the County Borough, and this will also be used to inform the decisions in respect of land allocations for the emerging plan.</p>	<p>No amendment is required.</p>

## Aims and Objectives

Comments in Support	Council Response
<p>Support the Council's Aims and Objectives that point towards securing sustainable growth on sustainable sites.</p> <p>The Preferred Strategy noted the historic environment needs to be managed sustainably with Objectives 23 and 24 and key aim N ensuring the historic environment is represented in the 2RLDP.</p> <p>Support the Council's Aims and Objectives that point towards securing sustainable growth on sustainable sites.</p> <p>Agree the Aims are appropriate.</p> <p>Support for the prominence given to tackling climate change and sustainable development (Aims A, B).</p> <p>The Aims are appropriate to meet the 2RLDP's vision and particularly agree with Aim I.</p> <p>General support for aim N, Objective 2 and 23.</p> <p>Note objective 8 that seeks to encourage the reuse of brownfield land, although greenfield land release will be required to deliver the level of growth.</p> <p>Pleased to see that the objectives strongly support sustainable development.</p> <p>Very supportive of objectives reducing need to travel, particularly Objective 15.</p> <p>The Key Aims and Key Objectives outlined in paragraphs 4.4 and 4.5 of the plan are generally supported as useful foundations for the wider development of plan policies.</p> <p>Agree the Objectives are appropriate.</p> <p>Support Aims I and J which relate to the provision of sustainable homes focussed on accessibility.</p>	<p>Comments in support are noted.</p>

Objections raised	Council Response	Recommendation
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<p>The aims lack a clear and unequivocal commitment to protecting and enhancing biodiversity.</p> <p>Aim E is poorly worded with an over-emphasis on "balancing" against other aims, which other aims are not. This should be reworded to more clearly to protect and enhance nature.</p>	<p>There are a number of Aims that address the overall issue of biodiversity enhancement, namely A (addressing climate change), B (sustainable Development) and E (Blue and Green Infrastructure protection and enhancement).</p> <p>In addition, the Vision, Aims and Objectives are integrated as the Vision sets the high-level view of how the County Borough would be at the end of the plan period, the aims set the overall aims of the policy framework and the objectives identify the outcomes of the Aims. Consequently the Vision, Aims and Objectives are inter-related and work together to provide an overall framework for the development of policy in the plan. The Vision identifies the development and enhancement of blue and green infrastructure, whilst there are 6 Objectives that address the issue of biodiversity enhancement: 2, 3 (which specifically addresses the Biodiversity Duty), 5, 12, 13 and 25. As a result it is considered that the issue of protecting and enhancing biodiversity has been covered sufficiently.</p> <p>Aim E has been drafted to reflect the balance between protection of the environment and delivering cultural, social and economic well-being as part of the overall requirement to deliver sustainable development. It is important to relate this balance as many representations against any plan on sustainability grounds only cite environmental factors, when sustainable development is the combination of social, economic, environmental and cultural factors. As outlined above the Vision, aims and objectives all address the issue of protecting and enhancing nature and the environment. As such it is considered that Aim E is drafted appropriately.</p>	<p>No amendment is required.</p>
<p>Reword Objective 3 to provide clarity on the difference between biodiversity and green infrastructure.</p>	<p>Paragraph 6.2.1 of PPW provides a definition of green infrastructure, whilst paragraph 6.4.1 of PPW provides a definition for biodiversity. The Development Plans Manual advises that LDPs should not repeat national policy and as such the definition provided by PPW should not be repeated in the 2RLDP. In addition to this the purpose of Objective 3 is for the plan to deliver the biodiversity duty utilising measures related to both green infrastructure and biodiversity. As such it would be inappropriate to include additional definitions of these terms in the Objective. It should be noted that an Evidence Base</p>	<p>No amendment is required.</p>

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	Background Paper relating to Green Infrastructure will be published as part of the Deposit Plan and this will refer to the relative definitions for Green Infrastructure and Biodiversity. Consequently, it is considered that no change is required to the Objective.	
Aim N be amended to include reference to heritage and its wider benefits.	Aim N seeks to protect, regenerate and enhance the historic environment for the benefits it brings to the communities of the County Borough. As such this Aim adequately addresses this issue.	No amendment is required.
Objective 8 encourages the re-use of appropriate brownfield land. However, there is a lack of suitable, viable and deliverable brownfield sites meaning the release of greenfield land is required to meet the need for new housing.	Objective 8 reflects paragraph 3.55 of Planning Policy Wales Edition 11 that “Previously developed (also referred to as brownfield) land . . . should, wherever possible, be used in preference to greenfield sites where it is suitable for development.” The Objective seeks to encourage the use of brownfield land but does not seek to direct all development towards such land. The Strategy accepts that there is not sufficient viable and deliverable brownfield land to accommodate all of the proposed growth for the County Borough over the plan period and accepts that greenfield land will also therefore need to be released. As such it is considered that the Objective has been drafted appropriately.	No amendment is required.
Object to the use of onshore wind turbines under Key Objectives 4.5 and 4.6.	National Planning Policy in Wales supports the generation of energy from renewable resources, including onshore wind power. Policy 17 of Future Wales states: “The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs.”. A significant proportion of the County Borough has been identified as forming part of a Pre-Assessed Area for Wind Energy. Future Wales policy 17 states “In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas.” Consequently it is a national policy position to promote onshore wind energy and with the Pre-Defined Areas there is a presumption in favour of it. Consequently, the Objectives are correct in referencing the need for wind energy generation.	No amendment is required.

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<p>Reducing use of private cars could be a clearer objective relating to Objective 5 carbon targets.</p>	<p>The purpose of the Objective is to address climate change impacts and mitigation through addressing energy issues. The Vision, Aims and Objectives are a series of cross-cutting and reinforcing elements that provide an overall framework within which the policy framework will be developed. As such there are many inter-related Aims and Objectives in respect of the issue of carbon footprint reduction and carbon targets. The transport aspects of this are addressed through Objectives 14, 15, 19 and 20. As such it is considered that Objective 5 has been drafted appropriately.</p>	<p>No amendment is required.</p>
<p>Additional aim suggested: "Ensure a sustainable supply of the raw materials required to facilitate the delivery of the principal aims identified, including affordable and market housing, infrastructure, employment, economic growth and the strategic transport network, whilst maintaining high standards of building design and local vernacular."</p>	<p>The aims are intended to be relatively broad, high-level statements that, in their totality, seek to realise the vision of the 2RLDP. Consequently, they express a high degree of interrelationship but also imply the continuation of underlying, contributory processes. It is considered that the aims that refer to the delivery of housing, infrastructure and other elements of the built environment, and the associated objectives that more directly address them, imply the ongoing supply of raw materials required in order to achieve this.</p>	<p>No amendment is required.</p>

**General – Vision, Aims and Objectives**

Comments in Support	Council Response
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<p>It is reassuring that the Plan's strategic vision, aims and objectives make reference to the impact of the environment in helping to improve the health and wellbeing of residents.</p> <p>General support for the Vision and Aims and Objectives of the Plan.</p> <p>The Vision, Aims and Objectives integrate well with the well-being goals and ways of working ensuring the Well-being Act is embedded throughout the plan.</p> <p>Welcome the Vision, Aims and Objectives set out in the plan and would advise that addressing the nature emergency will require action through a range of policy areas.</p>	<p>The support for the Vision, Aims and Objectives is noted.</p>
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<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>The vision is mixed with the aims and objectives and will not be achieved.</p> <p>The aims and objectives are mixed up and repeated - there is no logical progression.</p> <p>Many aims are not appropriate - some are pure fantasy.</p>	<p>The LDP vision was developed as part of the Council's engagement process with the Council's partners and authority members.</p> <p>It is not surprising that the Vision, Aims and Objectives of the plan cover similar areas as they are interrelated. Paragraph 4.3 of the Preferred Strategy Plan sets out the relationship between the Vision, Aims and Objectives, i.e. "In order to deliver the Vision through the 2RLDP, a series of Aims, which identify broad areas for action and Objectives, which set out detailed actions to deliver elements of the overall Vision, are set out." Consequently, the Aims and Objectives relate directly to each other and the Vision as they comprise a comprehensive overview of what the plan seek to achieve. Due to the fact that the Aims and Objectives address a number of cross-cutting issues it is not surprising that there is not logical progression, but as a whole they set out the comprehensive framework to deliver the outcomes for the plan.</p>	<p>No amendment is required.</p>

## Chapter 5 Strategic Growth and Strategy Options

<b>Comments in Support</b>	<b>Council Response</b>
Support for hybrid strategy, especially options 4 and 5.	The comments made in support are noted.



## Chapter 6 Sustainable Settlement Hierarchy

Objections raised	Council Response	Recommendation
<p>The Strategic site does not accord with the settlement hierarchy, has limited services and facilities.</p>	<p>PS3 - Settlement Role, Function and Sustainability Analysis sets out the reasoning behind the allocation of a Strategic Site at Maesycwmmmer and how it fits in with the settlement hierarchy and how it relates to the existing centres and metro nodes. The site in Maesycwmmmer represents the only realistic opportunity to deliver a scheme that can address a wide range of issues that are wider than just the site itself and the wider benefits that a large development can deliver.</p>	<p>No amendment is required.</p>
<p>Some sites are too remote to be walkable to jobs, shops and active travel routes. Strategic Sites should only be identified where there is opportunity for expansion.</p>	<p>The Candidate Sites that are currently being considered for inclusion in the 2RLDP will be the subject of a locational assessment that will assess their location in terms of proximity and access to the Principal and Local town centres and the Metro transport nodes. Those sites that are better located in these terms will be prioritised over sites that are more distantly located. Consequently, the sites that will be identified in the Deposit Plan will be the most sustainably located sites for allocation.</p>	<p>No amendment is required.</p>
<p>Residential centres should also have sustainable growth to supports their communities. Regeneration in the Heads of the Valleys is important to encouraging investment and should continue in some form in the next LDP.</p>	<p>It is agreed that residential settlements should accommodate growth where it is suitable to do so. In respect of the development in the north of the County Borough, the Council must be able to demonstrate that the sites identified to meet the housing requirement in the plan are both viable and deliverable within the plan period. The HOVRA suffers from low land and house values which severely restricts the viability and deliverability of sites in that area. Consequently, it is likely that although the majority of development proposed to meet the housing requirement will be identified outside of the HOVRA, the Council will look to allocate sites for development there to regenerate the area. These sites will be unlikely to contribute towards the overall plan requirements and would be additional to the allocations that seek to meet them.</p>	<p>No amendment is required.</p>

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<p>Components of housing supply are set out in masterplan areas not settlements, making it difficult to understand where development will be focussed. Spatial distribution of housing components should relate to the settlement tiers identified in Policy PS3. The plan should be clear how the majority of growth has been directed to more sustainable locations as defined in the hierarchy.</p>	<p>The decision to set out the components of housing supply by Masterplan area was a reflection of the fact that Metro transport nodes and the town centres (the two Strategy pillars) are distributed across the County Borough. Consequently, it was decided to break down the County Borough by the established Regeneration Masterplan Areas, which are considered to be as the reasonable catchment areas for the 5 Principal Town Centres. By breaking the figures down on this basis it reflects the relative levels of growth for each of the Principal Town's catchment areas.</p> <p>It is not possible to identify where exactly development will be identified as there is still a significant amount of work required to assess Candidate Sites and identify the most appropriately located and suitable sites for development in accordance with the Strategy pillars. Identifying the settlements which will be the subject of more significant levels of growth will be an integral part of the next part of the plan preparation process.</p>	<p>No amendment is required.</p>
<p>It is unclear where windfall units will come forward.</p>	<p>By their very nature it is not possible to identify where windfall sites will come forward as these are largely sites that become available after the preparation and adoption of the plan. It is impossible to identify the size and location of such sites by their very nature and it would be a futile exercise in assuming where such growth would go, as it would undoubtedly be incorrect.</p>	<p>No amendment is required.</p>
<p>Higher density on brownfield sites near town centres and public transit corridors will support town centre regeneration and avoid the need to release greenfields.</p>	<p>Future Wales sets out the requirement to seek higher density development in main centres and at Metro nodes and the plan will seek to do this where this is possible.</p>	<p>No amendment is required.</p>

## Chapter 7 The Preferred Strategy

Comments in Support	Council Response
<p>Support for preliminary advice about infrastructure requirements.</p> <p>Support policies PS6, PS8 and PS13.</p> <p>Support the Preferred Strategy and the long-term vision/objective of delivering sustainable economic growth.</p> <p>Support the amount and distribution of housing and economic growth across the County Borough.</p> <p>In favour of the overall plan which seeks to house everyone; and would like to see higher density development.</p> <p>Support the amount and distribution of housing and economic growth across the County Borough.</p>	<p>The comments made in support are noted.</p>

## Greenbelt

Objections raised	Council Response	Recommendation
<p>The Council need to strengthen countryside and active travel policies in the 2RLDP in a rural context, strengthening the presumption against unsustainably accessed development within the Green Belt. Suggest the addition of the following policy:</p> <p>“a policy confirming the extent of the Green Belt</p>	<p>The Preferred Strategy sets out the overarching framework within which more detailed policies, that will address issues such countryside protection and rural active travel, will be developed for the Deposit Plan. The Preferred Strategy does not seek to address all issues as these will be addressed through the Deposit Plan when it is prepared.</p> <p>Future Wales Policy 34 - Green Belts in the South East sets the requirement for the Strategic Development Plan to designate a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth.</p> <p>Future Wales Policy 19 - Strategic Policies for Regional Planning clearly identifies that the designation of the green belt and its boundaries is a matter for the SDP and are not a matter for local development plans. Given this the LDP does not have the power to pre-determine what the SDP will identify as green belt land and what it will not. Furthermore the Regional Strategic Diagram for</p>	<p>No amendment is required.</p>

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<p>within Caerphilly, to include Ruperra Castle and its parkland. Whilst we understand that the full Green Belt boundary is to be defined in the Strategic Development Plan (SDP), the Council should take the opportunity of the preparation of its 2RLDP to guide future work on this aspect of the SDP and to provide greater certainty until that plan is progressed”.</p> <p>Countryside to the South and East of Caerphilly town has been identified in the Wales National Plan as Greenbelt and must be treated as such.</p>	<p>south-east Wales, which shows the area for consideration for green belt, does not identify a green belt boundary and is a diagram, not a plan or scale map. Consequently it cannot be assumed that the land comprising Ruperra Castle, and its parkland would form part of the regionally designated green belt and it would be inappropriate for the LDP to consider it to be. Consequently there is no basis to include the suggested changes or policy.</p>	
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**Spatial Strategy Level of Growth**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Object to the overall strategy, because it appears the strategy commenced with housing</p>	<p>The Preferred Strategy did not start with housing as a solution. The identification and preparation of the Preferred Strategy was a rolling process that started with issues that the County Borough was facing, then considered what population level the plan would need to accommodate at the end of the plan period, then considered options on how to spatially accommodate the</p>	<p>No amendment is required.</p>

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<p>as a solution without the evidence.</p>	<p>level of population and its associated requirements (housing, employment, leisure and recreation etc.). This process is set out in PS1 - Strategy Options Assessment, PS2 - Preferred Strategy Engagement and PS4 - Population &amp; Housing Growth Options.</p>	
<p>It attempts to unnaturally increase the population of Caerphilly Basin.</p> <p>Welsh Government projections exceeded by 4000.</p> <p>Population is not expected to show large increases over the period of the plan.</p> <p>Growth predictions appear flawed and inconsistent.</p> <p>The County Borough has a jobs deficit and significantly high out-commuting levels which will only get worse if the population increases unabated.</p> <p>The spatial strategy is not sound.</p>	<p>The Preferred Strategy is based upon population and housing projections that were prepared as part of its identification and preparation. The 2018 based Welsh Government Mid-Year Estimates (MYE) identified Caerphilly County Borough as having a declining population for the first time in its history, predominantly based on natural change (births in relation to deaths). Whilst the impact of Covid-19 on the MYE is still not clear, the issue of a declining population raises very significant issues for the County Borough, not least the loss of population would mean that there would be a reducing working age population that would result in a decline in the County Borough's economy. This would mean that the Council would need to plan for economic recession. This would be at odds with the regional economic aspirations of the Cardiff Capital Region (CCR) that is seeking a 3.5% growth in jobs over the CCR City Deal period. The Council did not consider the option of recession to be one that it should pursue, and a range of alternative population projections were considered as options for the Preferred Strategy. These are set out in PS4 - Population &amp; Housing Growth Options. The Council considered the best projection for the County Borough to be one that addresses the need to ensure an economically active population to ensure that there are sufficiently economically active people to deliver the level in growth that the CCR are expecting across the region, namely an approximate 3.5% increase in jobs. The proposed level of growth underpinning the Preferred Strategy is above the Welsh Government MYEs for clear and obvious reasons, and the projections have been specifically selected to address the issues facing the County Borough, particularly to increase the number and level of jobs in the County Borough.</p>	<p>No amendment is required.</p>

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<p>Housing need based on questionable population forecast.</p>	<p>The amount of housing reflects the population projections used to inform the Preferred Strategy. The projections have been prepared to address the issues facing the County Borough (outlined in the above response and set out in PS4 - Population &amp; Housing Growth Options).</p>	<p>No amendment is required.</p>
<p>It seeks to allocate land that goes beyond the requirement of community need.</p> <p>The housing requirement for the whole of the Caerphilly County has already been met.</p> <p>6000 units have planning permission but are not built.</p>	<p>The land requirements identified for housing, employment, leisure, retail etc., over the plan period are directly related to the needs of the communities of the County Borough. The overall housing requirement for the plan period is 6,750 dwellings, with a 10% contingency, which is best practice for development plans, resulting in a total housing figure of 7,425 dwellings for the plan period. PS5 - Housing Land Supply and Affordable Housing Target, Table 7 identifies that there are 4,411 units of the housing requirement already within the existing land supply (including windfall allowances) meaning that the 2RLDP will need to find land for just over 3,000 units. So, there are not 6,000 units that are unbuilt, and the requirement cannot be met without the need for new allocations.</p>	<p>No amendment is required.</p>
<p>A significant underestimation of the amount of new sites the plan needs to allocate.</p> <p>Table 3 should be reconstructed to identify a need for land to accommodate a minimum of 5,300 new homes.</p>	<p>The Council's Population and Housing Projections address the specific issues that face the County Borough over the plan period and the Preferred Strategy has been based on this projection. It would be inappropriate for the Preferred Strategy to identify an artificially increased housing figure that does not accord with the other elements of the strategy, such as the number of jobs planned for, and all of the ancillary infrastructure requirements that would be required.</p>	<p>No amendment is required.</p>
<p>Too little development proposed in Caerphilly Basin and HOVRA.</p> <p>Caerphilly town as the top of the settlement hierarchy</p>	<p>The only site that is allocated in the Preferred Strategy is the Strategic Site at Maesycwmmmer, and this seeks to accommodate 1,200 dwellings during the plan period. The remaining housing requirement will be met by smaller sites that will be identified in the Deposit Plan. Consequently it is not possible to comment on the specific levels of development that would be accommodated</p>	<p>No amendment is required.</p>

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<p>should accommodate at least half of the planned growth.</p>	<p>in the Caerphilly Basin or the HOVRA at the current time. However, Future Wales identifies Caerphilly as a town for growth and the Council are keen to see development in the HOVRA to help regenerate the area.</p>	
<p>The degree of expansion proposed at Maesycwmmmer could undermine the SDP.  Reduce the plan's reliance on the strategic site to allow the current LDP approach to continue.</p>	<p>It is accepted that a significant proportion of the housing growth proposed for the plan period is identified at the Strategic Site in Maesycwmmmer and it is accepted that the delivery of the site is fundamental to the delivery of the strategy overall. However, the allocation of a strategic site provides the opportunity to generate a level of development capital that could be used to provide benefits to the existing communities in an area wider than just within the site boundaries, including sustainable transport issues, education and health provision. These considerations are set out in more detail in paragraphs 7.8 to 7.14 of the Preferred Strategy and with the PS1 - Strategy Options Assessment. The consortium proposing the Strategic Site has provided evidence in support of the site's allocation and have demonstrated that the site is viable and can be delivered.</p>	<p>No amendment is required.</p>

### Location of Development

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>New industrial development along the A465 Heads of the Valleys Road would benefit from the improved access along that highway.</p>	<p>The County Borough contains only a short section of the A465 Heads of the Valleys Road at Rhymney and Rhymney has a number of employment sites that are active and are allocated for development. The identification of additional employment land in this small area would be inappropriate until such time as the existing sites are brought forward for development. The broader view on employment development along the A465 will be considered through the SDP, which has the remit to consider cross-boundary issues such as this.</p>	<p>No amendment is required.</p>
<p>Insufficient actions to bring housing, employment, leisure &amp;</p>	<p>The HOVRA has a significant level of deprivation and suffers from low house and land values which significantly restricts opportunities for development due to viability issues. In making allocations the Council must demonstrate that the</p>	<p>No amendment is required.</p>

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<p>highway interconnection to the HOV areas.</p> <p>Employment and housing should be spread evenly throughout the Borough including to the north of Bargoed.</p>	<p>sites that it proposes are viable and deliverable within the plan period. However, the Council will identify sites in the HOVRA to stimulate regeneration in the area, although these sites will be over and above the sites identified to meet housing and employment requirements. The spatial distribution of sites will be set out in the Deposit Plan and the Council will look to distribute the sites so that the most sustainable sites are identified for development.</p>	
<p>Object to the strategy as it places too much development in the mid-valley/Ystrad Mynach area.</p>	<p>The only site that is allocated in the Preferred Strategy is the Strategic Site at Maesycwmmer, and this seeks to accommodate 1,200 dwellings, approximately 18% of the overall requirement, during the plan period. The remaining housing requirement will be met by smaller sites that will be identified in the Deposit Plan and the Council will seek to identify sites that are close to the Principal and Local Town Centres and the main Metro nodes. In this way the sites will be spread throughout the County Borough, and whilst the Strategic site is located in the Mid-Valleys area it will bring significant benefits for the wider area.</p>	<p>No amendment is required.</p>
<p>There are no plans showing where development will go so the effect on the settlements is unclear.</p> <p>All settlements should be separately identified and should not merge together.</p> <p>Housing would be built in 'unsustainable' places.</p>	<p>The detailed distribution of sites will be set out in the Deposit Plan as the exact distribution of sites is not yet known. However, the Preferred Strategy sets out two pillars for the designation of sites in the Deposit Plan, namely close to Principal and Local Town Centres and close to the main Metro nodes. As part of the allocation process the Council assess sites against a wide range of criteria. As part of this assessment the Council will consider the location of the site and its sustainability. The prevention of coalescence of settlements is generally supported to ensure that it does not result in ribbon development. However, in the South Wales Valleys ribbon development is an accepted and normal pattern of development, as it follows the river valleys and topography. Consequently, it would be inappropriate to adopt a general presumption against coalescence, although this should happen where it is appropriate and sustainable to do so.</p>	<p>No amendment is required.</p>



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<p>In the Caerphilly Basin we don't need any further urban spread.</p> <p>Object to the oversupply of housing land in the Caerphilly Basin.</p>	<p>There is no clear and compelling justification for the assumption that no further development should take place in the Caerphilly Basin. In fact Future Wales identifies Caerphilly Town as a specific location for sustainable growth. In addition, Figure 4 of Planning Policy Wales Edition 11 states "The proximity principle must be applied to ensure problems are solved locally rather than passing them on to other places or future generations. This will ensure the use of land and other resources is sustainable in the long term." It is clear that national policy and guidance expects some level of development to be accommodated in the Caerphilly Basin.</p>	<p>No amendment is required.</p>
<p>Make stronger reference to industrial legacy and ongoing environmental risks.</p>	<p>The industrial legacy of the County Borough is an important factor in how it has developed, and it is acknowledged that this legacy has left the County Borough with sites that have particular issues in terms of contamination and reclamation. However the Preferred Strategy considers the future of the County Borough and how it will look at the end of the plan period. The 2RLDP will address the issue of contaminated and unstable land in its policy framework in the Deposit stage of the preparation process, where the detailed policies of the plan will be set out. As such it is not considered appropriate to include this issue in the Preferred Strategy.</p>	<p>No amendment is required.</p>

## House Building

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Its only aim is to build houses.</p> <p>Overprovision of housing.</p> <p>Too much housing.</p> <p>The plan is 'overexuberant' in its house building predictions. Offers the</p>	<p>The level of housing directly relates to the Preferred Strategy Population and Housing projections, which has been used to address issues in the population structure to deliver the economic growth expected by the Council and the CCR over the plan period. The level of annual housebuilding is set between the Adopted LDP housing level of 575 dwellings per year, which has not been delivered, and the actual delivery level of approximately 385 per year and is considered to be a realistic level to be built every year at 450 per annum.</p>	<p>No amendment is required.</p>

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<p>wrong balance and distribution of housing options.</p>		
<p>Increasing the number of homes does not lead to growth or change to socio economic circumstances.</p>	<p>The provision of a home and a job are two fundamental elements in the socio-economic well-being of all residents. Consequently it is incorrect to assume that the provision of such basic necessities does not change the circumstances of the County Borough's residents.</p>	<p>No amendment is required.</p>
<p>The need to address empty properties. Too many empty houses that could be reused.</p>	<p>The purpose of the LDP is to identify what the requirements are for the County Borough and to allocate land to meet these requirements in the plan. The LDP only identifies housing sites over 10 units or half a hectare to demonstrate that the housing needs are being met. There is not a significant level of long-term empty properties in the County Borough and the Council has a dedicated team addressing these properties, bringing them back to beneficial use. Due to the low number of long-term empty houses the contribution such buildings would make to the overall land supply is very small. It should also be noted that a healthy housing market would see a natural empty property level of around 3%, so some empty properties are required to enable market churn.</p> <p>Caerphilly has the lowest dwelling vacancy rate of all local authorities in South East Wales, with the ratio for the South-East Wales region equating to 1.045. For the purposes of calculating the number of dwellings for households, an assumption of 1.037 as a conversion ratio for vacancies has been factored in account for vacant stock.</p>	<p>No amendment is required.</p>
<p>The provision of new housing is being driven by the wrong reasons, landowners and house builders wanting to make money and the Council wanting additional rates.</p>	<p>As outlined above the level of housing reflects the population and housing projection that has been used as the basis of the Preferred Strategy. These projections seek to address the population structure issues that have been identified for the County Borough and to assist in delivering the level of economic growth planned for by both the Council and the CCR. The assertion that the housing is identified for any other reasons is spurious and incorrect.</p> <p>The role of the LDP is to identify sufficient land to meet the requirements set out in the Preferred Strategy. There is little that the plan can do to influence</p>	<p>No amendment is required.</p>

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Disproportionate reliance on corporate firms and developers rather than supporting local builders.	who builds the developments, although the detailed policy framework that will be set out in the Deposit stage of the plan process could include policies that will seek to encourage smaller scale builders and also alternative mechanisms for delivery, such as self-build housing.	
Adopting a homes for life approach would be useful (Para 7.27).	It is agreed that adopting a homes for life approach would be a suitable approach for an element of the housing delivery. However, this would need to be set out in the detailed policy elements that would be included in the Deposit Plan. Paragraph 7.27 addresses the issues of the shortfall of affordable housing, and it would be inappropriate to include a reference to the homes for life approach in this paragraph or section.	No amendment is required.

### Legislative Requirements

Objections raised	Council Response	Recommendation
<p>Plan fails to deliver against aspects of the holistic intent of several pieces of well-structured legislation.</p> <p>It fails to meet the seven Well-Being Goals.</p> <p>It is not compliant with the WBFGA.</p> <p>The quality of life of the existing residents is not being addressed.</p>	<p>Appendix 1 of the Preferred Strategy sets out how the policies in the plan address the wider policy framework and how the plan meets the requirements of other documents and legislation. Appendix 1 sets out which elements of the following are addressed by each core-Deposit Plan policy:</p> <ul style="list-style-type: none"> <li>○ LDP Issues</li> <li>○ LDP Objectives</li> <li>○ Future Wales Policies</li> <li>○ National Sustainable Placemaking Outcomes</li> <li>○ Building better Places Issues</li> <li>○ Well-being Act Goals</li> <li>○ Well-being Objectives</li> <li>○ Corporate Plan Objectives.</li> </ul> <p>Appendix 1 identifies how the plan has taken account of the wider issues, including the Well-being Act and the quality of life for residents. In addition to this the plan is the subject of independent scrutiny through the Integrated</p>	No amendment is required.

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	Sustainability Appraisal that is part of, and integral to, the preparation of the 2RLDP. The ISA assessment considers the plan and its effects and impacts across a very wide range of considerations and where issues arise from this they are addressed by changes to the plan.	
Ensure that development is higher density.	The issue of higher density development is set out in Future Wales Policies 2 (in terms of sustainable placemaking) and 12 (in terms of development in close proximity to metro nodes). A key consideration for increased densities is the proximity to metro nodes and town centres. Consequently a blanket approach to achieving higher densities would be inappropriate as it would depend upon each site's circumstances. The Deposit stage of the plan will set out a detailed policy framework and this will take account of specific site circumstances and address the issue of development densities.	No amendment is required.
A far more regional and cohesive approach is required.	It is Welsh Government's position that the level of growth for all local authorities within the CCR should be developed on a regional basis. No local authority to date has prepared its growth figures in this way. However, the South East Wales Planning Officer's Society (SEWPOS), in conjunction with the South East Wales Strategic Planning Group (SEWSPG), has commenced a regional piece of work to address this issue. This will inform subsequent stages in the preparation of the 2RLDP.	No amendment is required.
The Deposit Plan should state clearly how it will support the development and use of the Welsh language and how it will promote the aims of the Welsh Language Strategy and the WESP.	It is agreed that the Deposit Plan will need to address the issue of how the plan will support the Welsh language and meet the aims of the Welsh Language Strategy, both in terms of the strategy of the document and in the policy framework itself.	No amendment is required.

**Strategic Site**

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Objections raised	Council Response	Recommendation
<p>Over-reliance on the strategic site.</p> <p>Strategic sites is putting all the eggs in one basket.</p> <p>The strategic site is not required. The whole strategy is wrong-headed and needs to be reformulated.</p>	<p>It is accepted that a significant proportion of the housing growth for the plan period is identified at the Strategic Site in Maesycwmmmer and it is accepted that the delivery of the site is fundamental to the delivery of the strategy overall. However, the allocation of a strategic site provides the opportunity to generate a level of development capital that could be used to provide benefits to the existing communities in a wider area than just within the site boundaries, including sustainable transport issues, education and health provision. These considerations are set out in more detail in paragraphs 7.8 to 7.14 of the Preferred Strategy and PS1 - Strategy Options Assessment. The consortium that is proposing the site has provided a wide range of evidence supporting the allocation of the site, which includes viability evidence that demonstrates that the site is both viable and deliverable.</p>	<p>No amendment is required.</p>

**Infrastructure**

Objections raised	Council Response	Recommendation
<p>Increased strain on infrastructure, environment, services, facilities.</p> <p>Increased strain on health services.</p> <p>Infrastructure appears lacking.</p> <p>Include reference to provision of healthcare, play and leisure facilities, and</p>	<p>The purpose of the Pre-Deposit Plan is to identify the Preferred Strategy that sets out the land requirements for the plan period and also provide a high-level policy framework within which detailed policies and site allocations can be developed. Consequently the Pre-Deposit Plan does not set out detailed policies addressing how infrastructure issues will be addressed. It should be noted, however, that the Council identifies issues with infrastructure through close interaction with infrastructure providers and through the assessment of sites considered for inclusion in the plan.</p>	<p>No amendment is required.</p>

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local food growing opportunities.		
Loss of recreation/amenity areas. The Llanbradach Colliery Field be protected for community/informal recreation use.	As part of the assessment of potential plan allocations the Council will ensure that important leisure and amenity areas are protected for their use and well-being benefit. The Deposit Plan will also set out policies that will look to protect important areas and will seek to encourage the development of new areas in association with development.	No amendment is required.
New industrial development along the A465 Heads of the Valleys Road would benefit from the improved access along that highway.	The County Borough contains only a short section of the A465 Heads of the Valleys Road at Rhymney and Rhymney has a number of employment sites that are active and are allocated for development. The identification of additional employment land in this small area would be inappropriate until such time as the existing sites are brought forward for development. The broader view on employment development along the A465 will be considered through the SDP.	No amendment is required.

## Highways and Transport

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
Generate additional traffic and congestion. Strategic site will increase the number of car journeys. Reduce safety on public highways. Unsustainable transport.	All new development will generate the need for trips, and this has traditionally taken the form of car borne trips. However, Future Wales sets out policies that seek to reduce car born travel and increase active and sustainable transport as alternatives. To facilitate this Future Wales sets out policies that seek to locate development close to principal towns and cities and key metro nodes to facilitate a modal shift away from the car. The Wales Transport Strategy “Llwybr Newydd” sets a target for modal shift to 40% of all trips by sustainable modes by 2040, and the recent Roads Review by Welsh Government has indicated that increasing capacity of the highway network is no longer a solution to transport problems. The Preferred Strategy sets out the two	No amendment is required.

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<p>Concern over the level of traffic that would be generated and the impact it will have on the A470 and its associated local highway networks.</p>	<p>locational policies in Future Wales as pillars of the strategy and, therefore, the sites allocated in the plan will promote modal shift by their location.</p> <p>In addition, the plan will include proposals designed to facilitate and maximise modal shift, including park and ride improvements, increased active travel connectivity and other associated measures. Overall the Preferred Strategy seeks to maximise modal shift in accordance with the Wales Transport Strategy targets.</p>	
<p>No improvements have been made to the highways system despite house building.</p>	<p>This is an incorrect statement. Since the adoption of the LDP two major improvements in the Caerphilly Basin have taken place, namely: Improvements to Trecenydd Roundabout in 2011 and Improvements to Pwllpant Roundabout in 2018. In addition to this a scheme for improvements to Bedwas Bridge is the subject of a stage 2 WeITAG assessment, improvements to the A472 in Nelson have taken place and the A469 Resilience Road has been the subject of a feasibility assessment. Further to these station and park and ride improvements have been completed at Rhymney (2014) and Pengam (2013).</p> <p>Details of the progress made in delivering all LDP transport allocations are included in PS11 - Transport Background Evidence Paper, Appendix 1.</p>	<p>No amendment is required.</p>
<p>Old railway lines need to be maintained and well-lit to encourage active travel (Para 7.33).</p>	<p>The protection of former railway lines for future transport use is set out in PPW and is a detailed policy matter for the 2RLDP. As a result, policies seeking to protect former rail lines will be included in the Deposit Plan.</p>	<p>No amendment is required.</p>
<p>Plan is light weight on transportation and travel needs and does not fully grasp the active travel concept.</p> <p>Loss of potential active-travel routes.</p>	<p>The purpose of the Pre-Deposit Plan is to identify the Preferred Strategy that sets out the high-level policy framework within which detailed policies and site allocations can be developed. It is not the role of the Pre-Deposit Plan to address detailed issues including active travel routes and their improvement which is more appropriately addressed in the Deposit Plan. The Preferred Strategy does however set out active travel as a key issue for the plan to address.</p>	<p>No amendment is required.</p>

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Green corridors should be used as active-travel routes.	Site allocations associated with the 2RLDP will not result in the loss of active travel routes, and even where sites do cover such routes, the development can be laid out and designed to maintain and enhance the existing route, whilst sites without active travel routes could benefit from the creation of new links associated with new development.	
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### Employment

Objections raised	Council Response	Recommendation
Too few jobs for future residents of strategic site (no accompanying employment sites).	Policy PS10 of the Preferred Strategy identifies the employment land requirement to meet the employment requirements of the Preferred Strategy. PS14 - Employment Background Evidence Paper sets out how the overall requirement of 44.5ha of land will be provided, with a mixture of existing sites and new allocations. It is considered that the employment provisions in the Preferred Strategy align directly with the proposed population.	No amendment is required.
<p>The need to relocate employment in town centres.</p> <p>Low-nuisance employment uses should be directed to town centres.</p> <p>Focus on delivering service-based jobs within and around existing town centres &amp; Metro stations.</p>	Policy PS10 of the Preferred Strategy states: “Provision will be made for 44.5 hectares of land to be identified for employment use . . . . This provision will be met from existing and new sites that accord with the principle of locating development in <u>close proximity to Principal and Local Centres and Metro nodes</u> ”. The policy clearly identifies that employment provision should be located in close proximity to town centres and Metro nodes, so this issue is addressed in the policy.	No amendment is required.
Plan does not embrace circular economy.	The purpose of the Pre-Deposit Plan is to identify the Preferred Strategy that sets out the high-level policy framework within which detailed policies and site allocations can be developed. The Preferred Strategy identifies an overall	No amendment is required.



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	<p>requirement for employment land to deliver the jobs necessary to meet the Preferred Strategy projection. The employment land requirement has been identified through a thorough assessment of the County Borough and the wider regional economic market. This assessment has been undertaken on the basis of defined employment sectors, which includes the sectors that comprise the circular economy. Consequently the employment land requirement does embrace the circular economy.</p>	
<p>Object to the lack of employment opportunities in the Caerphilly Basin.</p>	<p>It is agreed that there is a deficit of employment opportunities in the Caerphilly Basin. The employment land requirement includes consideration of this, and it is anticipated that land will need to be allocated in the Caerphilly Basin to address this issue. The detailed allocations will be set out in the Deposit Plan, as the Preferred Strategy sets out the overarching framework within which detailed allocations and policies can be developed.</p>	<p>No amendment is required.</p>

## Renewable Energy

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Need energy from clean sources.</p>	<p>The generation of renewable energy is a fundamental part of the Preferred Strategy. It is set out in the Vision, Aim L, Objective 6 and in two policies, PS6 - Climate Change and PS7 - Renewable Energy Generation. Consequently it is considered that the Preferred Strategy addresses the issue of renewable energy generation.</p> <p>The Council has undertaken a Regional Low Carbon Energy Assessment, PS13 - Regional Low Carbon Energy Assessment. On the basis of this assessment and in accordance with PPW, the Council will be setting targets for renewable energy deployment in the Deposit Plan and in order to support attainment of the targets set it will require supportive, clear criteria-based policies for all renewable energy technologies.</p>	<p>No amendment is required.</p>

## Greenfield

Objections raised	Council Response	Recommendation
<p>Increase the loss of undeveloped land.</p> <p>Excessive use of greenfield sites.</p> <p>Loss of food producing land.</p> <p>There should be no more development on greenfield sites.</p> <p>Green fields must be protected to ensure the 20% tree canopy cover called for in every Welsh town and city by the Future Generations Commissioner.</p> <p>Preserving greenfield sites would be in line with well-being goals.</p> <p>Greenfield development goes against green-infrastructure strategy.</p>	<p>The general assertion that greenfield development is bad and brownfield development is good is incorrect. Brownfield land contain some of the most important and diverse habitats that we have in the County Borough.</p> <p>Conversely a significant amount of the greenfield land surrounding our settlements is comprised of improved agricultural grassland which has little if any importance for nature conservation or biodiversity, with the exception of field boundaries, where they are comprised of stone walls or hedgerows (and these can be maintained and enhanced as part of development proposals). To assume a general presumption against development on greenfield land would, therefore, lead to the loss of some of the most important and diverse brownfield habitats and preserve greenfield sites with much less importance for biodiversity. This position does not deliver sustainable development.</p> <p>While PPW is clear that previously developed land should be utilised in preference to greenfield (paragraph 3.55), it also states that not all such sites will be suitable for redevelopment due to contamination, its unsustainable location or the potential for constraints to be imposed upon existing, adjacent activities. The adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, and those sites that remain fall into this category. Sites proposed for inclusion within the 2RLDP will be assessed in terms of deliverability and viability, which are important considerations in the site selection process and are factored into candidate site assessments.</p> <p>Green infrastructure is an important consideration for the 2RLDP as set out in the Preferred Strategy's vision and aims. However, the Green Infrastructure Strategy for the county borough and the emerging Green Infrastructure Assessment for the plan are tools that are used to identify the most suitable and appropriate sites for development, whilst maintaining and enhancing the important areas of land. Consequently, far from being contrary to the Green Infrastructure Strategy, sites are allocated in accordance with it. Furthermore, PPW Paragraphs 6.2.4 and 6.2.5 set out how green infrastructure can be</p>	<p>No amendment is required.</p>

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	integrated into developments, improving well-being and helping deliver placemaking outcomes.	
Brownfield sites throughout the area not being used.	<p>PPW advises that previously developed land (brownfield sites) should be identified for development before greenfield sites, where brownfield sites are viable, deliverable and in sustainable locations. No evidence has been provided by the representor to support the view that appropriate brownfield sites are not being used. The Adopted LDP included a brownfield led strategy of the development of the southern connections corridor and this has been largely successful. Consequently, the brownfield sites that are still available within the area require significant public sector intervention to facilitate their redevelopment and the Council is working with the Welsh Government and the private sector to unlock these sites wherever possible.</p> <p>This is also the case throughout the County Borough. Whilst there are a number of brownfield sites across the County Borough, these sites generally require significant remediation and reclamation before development can take place and this means that the development of some of these sites may not be viable and so cannot be included in the emerging plan unless mechanisms to unlock them have been identified and can be achieved.</p> <p>The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Greenfield development is essential to deliver the overall requirements of the plan.</p>	No amendment is required.
Extant planning permissions, brown-field candidate sites, and small windfall sites will deliver the Preferred Strategy without the need to release peripheral green-field sites.	Table 7 of PS5 - Housing Land Supply and Affordable Housing Target identifies that the 2RLDP has an existing housing land supply of a little over 4,400 dwelling units, meaning that the Preferred Strategy needed to identify a land requirement for a little over 3,000 units. Very few of the submitted candidate sites are brownfield, and where these are considered suitable for further consideration, they would not account for the 3,000 units required to meet the overall requirement. Consequently a proportion of greenfield release is required.	No amendment is required.

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<p>Increases in the housing density on brownfield sites near public transport nodes would demonstrate an efficient use of land and help protect countryside.</p>	<p>It is agreed that sites in close proximity to Metro nodes, both greenfield and brownfield, should be delivering higher densities than those located further away. However, there only a limited number of sites that would be suitable to seek higher densities and these sites would not greatly influence the amount of land needed to meet the requirements of the projections.</p>	
<p>Access to the rivers and the local countryside should be improved and more indigenous trees planted.  Effect on Green Belt shown in Future Wales.</p>	<p>It is agreed that access to rivers and the countryside should be improved as part of the 2RLDP proposals and that more trees should be planted. The purpose of the Pre-Deposit Plan is to identify the Preferred Strategy that sets out the high-level policy framework within which detailed policies and site allocations can be developed. Policies to deliver improved accessibility and deliver the biodiversity duty will be set out in the Deposit Plan.</p>	<p>No amendment is required.</p>
<p>Not enough green space for current residents.</p>	<p>The County Borough is comprised of 22% of land in urban form and 78% of land as open countryside. Consequently there is more than sufficient green space for the residents of the County Borough. A key factor in this issue is the accessibility of green space, both inside and outside of settlement limits. The Preferred Strategy sets out the overarching framework for the development of detailed policies and allocations and the Deposit Plan, will contain policies addressing these issues. A key element for the Deposit Plan will be the protection and enhancement of important urban green space, and this will be informed by the Green Infrastructure Assessment that will be prepared to inform the Deposit Plan.</p>	<p>No amendment is required.</p>

**Flood Risk Climate Change**

Objections raised	Council Response	Recommendation
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<p>Increase in surface-water run-off. Increased risk of flooding. Increase strain on sewers.</p>	<p>Flood risk is an issue associated with coastal areas, rivers and surface water from developed and undeveloped land alike. Surface water flooding occurs from undeveloped land and development on such land can address the flooding issues and remedy the situation. All new development is required to include an appropriate drainage system that is based upon Sustainable Drainage System (SuDS) principles and prioritise natural methods rather than artificial ones. Any drainage system for a development needs to get SuDS Approval Body (SAB) approval for their system before development can commence. The SAB will seek to ensure that the surface water run-off from a site will be less than it was as an undeveloped site and will ensure that the development will reduce or eliminate any surface water flood risk to adjoining land.</p> <p>The Council work closely with Welsh Water in respect of the development plan and Welsh Water input into the process to ensure that the allocations coming forward in the plan do not give rise to issues with the existing sewerage network. Where issues are raised developers will be required to deliver upgrades to the system in order to allow development to proceed.</p>	<p>No amendment is required.</p>
<p>Housing should be adaptable to weather extremes (Para 7.27).</p>	<p>It is agreed that the design of new housing should reflect the need to address climate change and its mitigation. However these measures are generally set out in Building Regulations that provide a more concrete foundation from which to enforce such measures. The Deposit Plan, will include policies that address the issues of design and adaptation to, and mitigation of, the impacts of climate change, along with policies that address the need to reduce emissions.</p>	<p>No amendment is required.</p>
<p>Against policies on climate change. Contrary to national policy and declaration of climate emergency.</p>	<p>The issue of climate change and its implications are a key consideration for the 2RLDP, and mitigating for climate change effects as well as reducing emissions contributing toward climate change are fundamental elements in the development strategy. The Preferred Strategy contains Policy PS6: Climate Change which aims to ensure all development proposals make a positive contribution towards addressing the causes of, and adapting to the impacts of, climate change.</p>	<p>No amendment is required.</p>

**Biodiversity**

Objections raised	Council Response	Recommendation
<p>Adverse effect on nature. Nature emergency. The National and Regional issues set out in the Preferred Strategy should include the nature emergency.</p>	<p>The preparation of the Preferred Strategy has been undertaken with the need to address the Nature Emergency as a fundamental part of the overall process, in a similar way that placemaking, the need to address climate change and the climate emergency and the biodiversity duty and socio-economic duties have been.</p> <p>The promotion of the Nature Emergency priorities (Nature based solutions, Resource efficiency/renewable energy and a place-based approach) are an integral part of the preparation, consideration and assessment of the Preferred Strategy. For example, the assessment of Candidate Sites has taken account of ecological and biodiversity issues, whilst the consideration of areas for growth and the functional and sustainability analysis of settlements has been informed by the Council’s Green Infrastructure Assessment and the emerging Green Infrastructure Assessment.</p> <p>It is accepted that the evidence base and Preferred Strategy itself may not convey this information as straight-forwardly as it could have and future evidence and work on the plan will need to ensure that it is clear that this issue is a fundamental part of the process.</p>	<p>No amendment is required.</p>
<p>Loss of trees.</p>	<p>Trees, woodlands, and hedgerows are of great importance for wildlife habitats as well as making a significant contribution to landscapes character. Important areas of trees, such as ancient woodland, will be protected in the detailed policies contained in the Deposit plan, and there are several pockets of ancient woodland within the Strategic Site area. The Green Infrastructure Assessment that is being prepared to inform the Deposit Plan will identify important areas of trees that will be taken into account when allocating development sites.</p> <p>Whilst the development of some sites may involve the removal of a small number of trees, the requirement for development to contribute towards biodiversity enhancement will mean that such developments will be required to</p>	<p>No amendment is required.</p>

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	include enhancement and landscaping proposals as part of their design. This requirement will be addressed in policies that will be set out in the Deposit Plan.	
The Preferred Strategy takes a pre-Future Wales LDP approach to ecological and biodiversity issues.	<p>The preparation of the Preferred Strategy has been undertaken with the need to address the Nature Emergency as a fundamental part of the overall process, in a similar way that placemaking, the need to address climate change and the climate emergency and the biodiversity duty and socio-economic duties have been.</p> <p>The promotion of the Nature Emergency priorities (Nature based solutions, Resource efficiency/renewable energy and a place-based approach) are an integral part of the preparation, consideration and assessment of the Preferred Strategy. For example, the assessment of Candidate Sites has taken account of ecological and biodiversity issues, whilst the consideration of areas for growth and the functional and sustainability analysis of settlements has been informed by the Council's Green Infrastructure Assessment and the emerging Green Infrastructure Assessment.</p> <p>It is accepted that the evidence base and Preferred Strategy itself may not convey this information as straight-forwardly as it could have and future evidence and work on the plan will need to ensure that it is clear that the plan has been developed from an ecological and biodiversity approach.</p>	No amendment is required.
The omission of Future Wales Policy 9 from the list of policies identified as being of importance at 2.24 is a significant omission.	It is agreed that Future Wales Policy 9 should be referenced in Paragraph 2.24, and it is considered appropriate to amend the strategy to include this.	Include reference to Future Wales Policy 9 within the Preferred Strategy.

## Chapter 8 Next Steps

Comments in Support	Council Response
The Preferred Strategy is comprehensive and covers some pertinent issues.	The comments made in support are noted.

Objections raised	Council Response	Recommendation
Question the commitment to the Active Travel Act 2013 and Future Generations Act. The Preferred Strategy should put more emphasis on active travel and the protection of culture.	The Preferred Strategy, including the Strategic Site, accords with both the Active Travel Act 2013 and the Future Generations Act. The Preferred Strategy has two transport-related policies that refer to active travel, and Policy PS8: Placemaking Principles mentions the 'protection and enhancement of cultural aspects.' Welsh Government suggests that the Strategic Site, because of its location and topography, might not lend itself to walking, cycling and the use of public transport. It also suggests that the provisional plans show a 'car/road-dominated layout'. The Council will discuss these observations with the site promoters.	No amendment is required.



**Policy PS1: The Level of Growth for the 2RLDP**

<b>Comments in Support</b>	<b>Council Response</b>
<p>Support for proposed level of growth.</p> <p>Support for the hybrid approach to the distribution of housing and economic growth across the County Borough. In particular, the combined approach of Options 4 and Option 5 should see development come forward in sustainable locations with good access to public transport and within close proximity to services and facilities.</p> <p>Pleased that the Council discounted the eight scenarios that would not require housing allocations over the Plan period from their shortlist.</p>	<p>The comments made in support are noted.</p>

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>The expected growth has been deliberately overestimated by the Planning Department.</p> <p>Discrepancy between WG and LDP figures warrants independent investigation.</p> <p>Over provision of housing in this plan.</p> <p>No need to destroy more countryside to meet CCBC's Preferred Strategy, particularly when this strategy targets 4,000 more houses than is required to meet the</p>	<p>The evidence base in respect of the 2RLDP's proposed level of growth, and the associated housing land requirement, is set out in PS4 - Population and Housing Growth Options. A series of growth scenarios were considered which used the 2018-based Welsh Government population and household projections as their starting point. Scenario J was ultimately chosen by the Council as the preferred scenario as it aims for a sufficient increase in the working age population, over and above that set out in the projections, to support the Cardiff Capital Region (CCR) jobs target for South East Wales and represents a mid-point between the adopted LDP's annual housing requirement and the past build rates figure. Relying on the projections alone would amount to planning for economic decline, which would not be sustainable. This approach will be tested during the public examination process, which will be chaired and adjudicated by an independent planning inspector.</p> <p>Whilst Background Paper PS4 - Population and Housing Growth Options was produced before the first outputs from the 2021 Census were released in June 2022, a further background paper PS18 - Census 2021 and the implications</p>	<p>No amendment is required.</p>

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<p>Welsh Government's projections.</p> <p>The sites taken in combination would result in the loss of local countryside area equivalent to a town the size of Pontypridd.</p> <p>Proposed level of growth does not reflect ambitious vision of the plan.</p> <p>Additional growth-led scenarios should have been assessed.</p> <p>The flexibility of choice for positive growth rates is not provided within the assessed growth options.</p> <p>Option J is questioned whether it will deliver growth above past longer-term trends or deliver improved economic and social outcomes for the County Borough.</p> <p>Any growth option and target needs to accord with Policy 33 of Future Wales 2040 (designating the Borough as part of the National Growth Area).</p>	<p>for the 2nd Replacement Local Development Plan was produced in October 2022 and this sets out the potential implications of the lower base population and number of households on the evidence base for the 2<sup>nd</sup> Replacement LDP.</p> <p>It concludes that the 2021 Census reinforces some of the key concerns that have been identified as part of the 2RLDP evidence base, including the imbalance in the population with an ageing population and declining working and school age population, and the high average household size, which is linked to the affordability of housing.</p> <p>The Census is only a snapshot of the population and is not a forecast, although comparisons and trends will undoubtedly be drawn between this data and previous Censuses. The fact that the population is lower than the 2RLDP is planning for is a concern as the reasons for it are not understood, but this in itself does not undermine the validity of the scenarios that the plan has considered, as ultimately, the 2RLDP considers the land use implications of population, household and dwelling change over time. This change is influenced by policy decisions on the level of growth that should be accommodated to address the challenges faced and Caerphilly's location within a Future Wales Growth Area, rather than simply allowing past trends to continue. As a consequence, the preferred level of growth is considered to remain appropriate.</p>	
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<p>Support for a higher growth option of Scenario H.</p> <p>Disagree that Scenario J is the most desirable, realistic and robust option to base the 2RLDP on as this comprises a mid-point figure, which is working age population led.</p> <p>Post-pandemic population and housing projections have not been considered.</p> <p>PS4 evidence base document was written prior to the release of the 2021 census data. This newly released data should be considered and included within the RLDP to identify if a further increase in population growth has taken place.</p>		
<p>Additional land should be identified in the event of any delivery issues occurring with Maesycwmmer, and amongst current supply, which accounts for a substantial amount of the</p>	<p>It is accepted that a significant proportion of the housing growth for the plan period is identified at the Strategic Site in Maesycwmmer and it is accepted that the delivery of the site is fundamental to the delivery of the strategy overall. However, the allocation of a strategic site provides the opportunity to generate a level of development capital that could be used to provide benefits to the existing communities in a wider area than just within the site boundaries, including sustainable transport issues, education and health provision. These considerations are set out in more detail in paragraphs 7.8 to 7.14 of the Preferred Strategy and PS1 - Strategy Options Assessment.</p>	<p>No amendment is required.</p>

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homes needed in the plan period.	The consortium that is proposing the site has provided a wide range of evidence supporting the allocation of the site, which includes viability evidence that demonstrates that the site is both viable and deliverable.	
The right sites in the right locations should be allocated based on their sustainable locations.	Proposed site allocations for all land uses will be required to meet the principles of sustainable development as set out in Planning Policy Wales.	No amendment is required.

**Policy PS2: The Preferred Strategy for the 2RLDP**

<b>Comments in Support</b>	<b>Council Response</b>
<p>The range of options set out for the Preferred Strategy is reasonable and the inclusion of Option 4 is broadly supported.</p> <p>Support the identification of a Strategic Site at Maesycwmmmer.</p> <p>Support the Concentration of development at metro stations.</p> <p>Support the Town centres first approach.</p> <p>Agree the strategy is appropriate.</p> <p>Support the Council's approach to the distribution of housing and economic growth across the County Borough using a hybrid option.</p> <p>Support the approach taken which provides flexibility for site selection.</p>	<p>The comments made in support are noted.</p>

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>The reliance on option 3 (a single strategic site) represents a significant risk to the deliverability of the plan.</p>	<p>It is accepted that a significant proportion of the housing growth for the plan period is identified at the Strategic Site in Maesycwmmmer and it is accepted that the delivery of the site is fundamental to the delivery of the strategy overall. However, the allocation of a strategic site provides the opportunity to generate a level of development capital that could be used to provide benefits to the existing communities in a wider area than just within the site boundaries, including sustainable transport issues, education and health provision. These considerations are set out in more detail in paragraphs 7.8 to 7.14 of the Preferred Strategy and within PS1 - Strategy Options Assessment. The consortium that is proposing the site has provided a wide range of evidence supporting the allocation of the site, which includes viability evidence that demonstrates that the site is both viable and deliverable.</p>	<p>No amendment is required.</p>

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<p>Empty properties and brownfield land should be prioritised.</p> <p>Objection to the development of brownfield sites on the grounds of flooding, accessibility, transport and environmental impact.</p>	<p>Paragraph 3.55 of PPW states: “Previously developed (also referred to as brownfield) land . . . should, wherever possible, be used in preference to greenfield sites where it is suitable for development.” As national policy the emerging LDP will need to reflect this position and as such the Preferred Strategy correctly seeks to utilise viable and deliverable brownfield sites (and buildings) before greenfield sites.</p> <p>There is not a significant level of long-term empty properties in the County Borough and the Council has a dedicated team addressing these properties, bringing them back to beneficial use. Due to the low number of long-term empty houses the contribution such buildings would make to the overall land supply is very small. It should also be noted that a healthy housing market would see a natural empty property level of around 3%, so some empty properties are required to enable market churn.</p> <p>Caerphilly has the lowest dwelling vacancy rate of all local authorities in South East Wales, with the ratio for the South-East Wales region equating to 1.045. For the purposes of calculating the number of dwellings for households, an assumption of 1.037 as a conversion ratio for vacancies has been factored in account for vacant stock.</p>	<p>No amendment is required.</p>
<p>There is too much development proposed in mid-valley area and Ystrad Mynach basin.</p> <p>Places additional strain on infrastructure, population, nature.</p> <p>Increase in traffic and pollution making roads less safe.</p>	<p>The only development proposed as part of the Preferred Strategy is the development associated with the Strategic Site at Maesycwmmmer, and the identified amount of development for the plan period amounts to around 18% of the total new housing requirement. The remainder of the allocations to deliver the requirement will be identified in the Deposit Plan. With over half of the remaining housing requirement and the other land use requirements to be identified in the Deposit Plan it is not possible to say that there is too much development in this area.</p> <p>The level of growth set out in the Preferred Strategy will require new sites to be allocated to accommodate the development required to meet it. These sites will be assessed to ensure that their allocation does not impact upon road safety, increase pollution levels, increase flood risk, or lead to the loss of valuable open space, recreational assets and areas of importance for</p>	<p>No amendment is required.</p>

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<p>Increasing flood risk with some sewers already overloaded.</p> <p>Will result in the loss of green spaces/recreation areas affecting people's health.</p> <p>Concerns raised in respect of the loss of countryside and effect on wildlife and the environment, lack of brownfield development, increased congestion and overburdening public-transport networks, prioritising the reuse of empty buildings and increasing pressure on health services.</p> <p>Question emphasis on development at all costs.</p>	<p>biodiversity. The Council is required to deliver sustainable development and to deliver the Biodiversity and Socio-Economic Duties and the 2RLDP will need to contribute towards this. In addition, the plan seeks to tackle climate change, promote the transport and energy hierarchies and improve the health and well-being of the communities in the County Borough as well. Sites will only be identified where they meet all of these requirements. Consequently the 2RLDP will accommodate the proposed levels of growth and meet these requirements.</p>	
<p>Ness Tar site may be unsuitable for development because of contamination.</p>	<p>The Preferred Strategy sets out the overarching framework within which more detailed policies and sites will be identified in the Deposit Plan. The only site identified as part of the Preferred Strategy is the Strategic Site at Maesycwmmmer and this has been identified because of its importance in delivering the overall strategy. All sites being considered for the 2RLDP are being assessed for the suitability for allocation and once this process has been completed the Deposit Plan will identify sites that will meet the strategy requirements. The Ness Tar site is currently being assessed as part of this process and the issues of the site's suitability for development will be considered in due course.</p>	<p>No amendment is required.</p>





**Policy PS3 : Settlement Hierarchy**

Objections raised	Council Response	Recommendation
<p>The designations of the principal towns and local centres listed is accepted. However, greater consideration needs to be given to the distribution of growth below tier 1 and 2 than is offered by the 'Residential Settlements' designation that captures 50 settlements. Currently, the diverse range of Residential Settlements is considered too broad to form part of the same tier. 2RLDP evidence document PS3 recognises that not all of the Residential Settlements are suitable for future growth and that there are clear differences between the places identified within tier three of the hierarchy. This should be outlined within the policy.</p>	<p>Although not specified in Policy PS3, the Functional Analysis Background Paper recognises that residential settlements have different capabilities in terms of accommodating future development and have been categorised accordingly. Policy PS3 is an overarching policy that establishes the basic concept of the hierarchy, as required by national policy. The more refined categorisation that is set out in the background paper will be used to inform more detailed policy to be included within the Deposit Plan, and to influence candidate site assessments and considerations regarding site allocations. It is considered that the approach taken by the Preferred Strategy, in conjunction with the background documentation that is clearly referenced in paragraph 6.2, is sufficient in order to provide a framework for more detailed policy/site considerations relating to the settlement hierarchy.</p>	<p>No amendment is required.</p>

**Policy PS4: Areas of Growth**

Objections raised	Council Response	Recommendation
<p>Plans for growth do not follow settlement hierarchy.</p> <p>Over-reliance on strategic site.</p>	<p>The extension of Maesycwmmmer would maintain the adopted LDP’s hierarchy of settlements.</p> <p>Paragraphs 7.8 to 7.14 of the Preferred Strategy discuss the Strategic Site in detail. Because of its size, a strategic site has the potential to ‘generate significant development capital and associated benefits’ (see paragraph 5.11 of PS1 - Strategy Options Assessment). The site’s inclusion within the plan, and the success of the strategy, are dependent on the deliverability and viability of the site, which must be evidentially demonstrated and will be tested by the inspector during the examination of the plan. An LDP is subject to annual monitoring and periodic review, thereby ensuring a mechanism for addressing the delivery of housing development where this may become an issue.</p>	<p>No amendment is required.</p>

**Policy PS5: Strategic Site, Maesycwmmmer**

Representations made to Policy PS5 are considered within **Annex 4**, which provides a summary of comments received in respect of the proposed Strategic Site, Parc Gwernau, Maesycwmmmer.

**Policy PS6: Climate Change**

Comments in Support	Council Response
Support for Policy.	The comments made in support are noted.

Objections raised	Council Response	Recommendation
<p>Large scale housing site at Maescwmmmer is a huge retrograde step regarding the climate crisis.</p> <p>Policy is weak, allowing developers too wide a scope for interpretation, policy to 'require' and 'mandate'.</p> <p>Should include a requirement that no homes are to be built, or properties refurbished, with fossil fuel heating systems, this is precisely the sort of practical detail the plan lacks.</p> <p>If air source heat pumps and solar panels were to be made mandatory, this</p>	<p>The issue of climate change and its implications are a key consideration, and mitigating for climate change effects as well as reducing emissions contributing toward climate change are fundamental elements in the development strategy. The Preferred Strategy contains Policy PS6: Climate Change which aims to ensure all development proposals make a positive contribution towards addressing the causes of, and adapting to the impacts of, climate change.</p> <p>The Council has undertaken a Regional Low Carbon Energy Assessment, PS13 - Regional Low Carbon Energy Assessment. On the basis of this assessment and in accordance with PPW, the Council will be setting targets for renewable energy deployment in the Deposit Plan and in order to support attainment of the targets set it will require supportive, clear criteria-based policies for all renewable energy technologies.</p> <p>Furthermore, work will be undertaken prior to Deposit Plan stage to consider the integration of renewable energy into strategic developments within the 2RLDP.</p>	<p>No amendment is required.</p>

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would boost renewable energy sector.		
The Council could plan to put solar panels on all offices and Council homes.	The Council has produced a Decarbonisation Strategy: Reduce, Produce, Offset and Buy and accompanying Prospectus and Action Plan. This strategy sets out how the Council intends to reduce its own carbon footprint and deliver the overarching objective of being a net carbon neutral authority by 2030. The accompanying Action Plan details the actions the Council will take, including maximising renewal energy generation on Council homes and buildings. However, much of this falls outside of the planning process.	No amendment is required.
Clarification required on the definition of "local materials". Only 4% of Welsh timber is used in construction, and locally sourced aggregates and building stone adhere to the local vernacular.	The inclusion of 'local materials' supports PPW, which advocates the use of locally sourced materials, as this can lead to emissions reductions from transport and will also protect and enhance local distinctiveness.  To ensure consistency with PPW, Policy PS6, point A, should be amended to read 'locally sourced materials.'	Policy PS6, point A, should be amended to read 'locally sourced materials.'

**Policy PS7: Renewable Energy Generation**

<b>Comments in Support</b>	<b>Council Response</b>
<p>Support for Policy.</p> <p>Council could take a simpler, wider and more agile approach to energy generation, including solar panels on all their south facing buildings, including housing and tree-planting on Council land.</p>	<p>The comments made in support are noted.</p> <p>The Council has produced a Decarbonisation Strategy: Reduce, Produce, Offset and Buy and an accompanying Prospectus and Action Plan. This strategy sets out how the Council intends to reduce its own carbon footprint and deliver the overarching objective of being a net carbon neutral authority by 2030. The accompanying Action Plan details the actions the Council will take, including maximising renewal energy generation on Council homes and buildings and tree planting.</p>

## Policy PS8 – Placemaking Principles

Objections raised	Council Response	Recommendation
<p>Recent decisions have not taken cumulative impact into consideration despite multiple layers of heritage. Potential allocations around the Ruperra site will significantly impact upon the integrity of the heritage, ecological and landscape designations at this location. This approach does not conform with the Well-Being of Future Generations Act as the proposals are not sustainable development and are within open countryside. Propose the renumbering of policy PS11 as PS8 H which would recognise heritage assets contribution towards both managing tourism growth and placemaking. Proposed wording "Protection of the County Borough's natural, historic and landscape</p>	<p>The Council is committed to protecting its heritage assets throughout the County Borough. Heritage is a key component of strategic placemaking, and it is vital that such elements are protected and integrated within communities. The Council notes comments made in relation to amending Policy PS11. However, it is considered that the policy as presently worded will ensure adequate protection for natural and built heritage assets and allows such assets to be taken into account depending on the specific characteristics of a particular proposal along with other relevant policy considerations.</p> <p>All candidate sites for which a stage 2 assessment has been undertaken have been subject to an initial examination from a heritage perspective. However, the status of all candidate sites is subject to change pending further assessment. The Council will publish its final list of sites considered acceptable for allocation at the Deposit stage of the plan.</p>	<p>No amendment is required.</p>

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<p>assets that give it a unique identity, with more weight being given to this protection where there are multiple designations”.</p>		
<p>Cycle lanes required to not isolate communities, these must be accessible for all residents to use the sustainable transport network.</p>	<p>The Council is committed to delivering sustainable and accessible communities for all its residents. Cycle lanes will remain an extremely important part of the active travel network and will also play a key role in meeting modal shift targets. The Council intends to make cycling safer and easier for people. It has recently updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and new routes. The Welsh Government has approved the ATNM.</p>	<p>No amendment is required.</p>

**Policy PS9 – Green and Blue Infrastructure**

Comments in Support	Council Response
<p>Support for GI policy</p> <p>Support for protection of SINCS.</p> <p>Avenue of trees which ascends the public right of way from Maesycwmmer toward Bedwas is preserved</p>	<p>The comments made in support are noted.</p>

Objections raised	Council Response	Recommendation
<p>Preferred Strategy failure to identify areas for ecological protection at this stage, reliance on development proposals to not cause ecological damage.</p> <p>Protection of Llanbradach Field / Colliery Field for ecological value.</p> <p>Llanbradach Field / Colliery Field should be designated as public open space.</p> <p>Llanbradach Field / Colliery Field should be developed as a Nature reserve.</p>	<p>The Preferred Strategy does not designate specific areas for safeguarding, recreation, or community use at this stage. However, the evidence base of the Council’s Green Infrastructure Assessment will inform which areas will be protected due to their ecological value, community benefits and general health and well-being benefits. These areas will be consulted on during the Deposit stage of the 2RDLP. The Council notes several areas of ecological and recreational concern within the Llanbradach area, which will be assessed and considered for the Deposit Plan.</p> <p>The Council notes concern regarding the protection of former rail lines for recreation and community use. The routes identified above of specific concern are part of the national cycle network, which will continue to be protected. PPW outlines the importance of active travel and requires local authorities to produce active travel route maps and identify new opportunities. The Council has recently updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and future routes.</p>	<p>No amendment is required.</p>



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<p>Protection of Bluebell Field / Coed Margaret Shon for ecological value.</p> <p>Protection and maintenance of community field for recreation.</p> <p>Bluebell Field / Coed Margaret Shon should be protected and allowed to regenerate as a Bluebell field.</p> <p>Old Railway Lines between Maesycwmmmer and Bedwas should be protected for community and recreational use.</p>		
<p>Greenspace provision threatened by development, residents require open spaces for recreation and dog walking etc.</p>	<p>Green and open spaces are essential for health and well-being as well as providing benefits for sport, recreation, and community use. The 2RLDP will ensure that all residents have access to green and open spaces and will protect valuable open spaces from development where appropriate</p>	<p>No amendment is required.</p>
<p>Preferred Strategy and Strategic Site does not conform to PS9.</p>	<p>The Preferred Strategy and Strategic Site centre around the implementation of sustainable development. All developments in line with national policy, guidance and legislation must have equal regard for the social, economic, environmental, and cultural functions of the local area. Policy PS9: Green and Blue Infrastructure will function at different scales within the local authority. In the first instance it seeks to protect and maintain the most significant sites of ecological importance.</p>	<p>No amendment is required.</p>

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	<p>Secondly it seeks to identify new opportunities to enhance areas of low ecological value to create areas of biodiversity and habitat connectivity. This will be implemented into new development proposals as a principle of strategic placemaking. All development proposals will be required to protect and maintain existing green infrastructure and provide satisfactory mitigation where this is not possible. In addition, development proposals will be required to implement sustainable drainage systems from the outset, provide areas of green and open space and connect areas of ecological importance.</p>	
<p>Proposals would result in the loss of many mature trees.</p>	<p>Trees, woodland, and hedgerows are of great importance for wildlife and habitats as well as their contribution to the landscape. PPW requires them to be protected where possible and outlines that any unavoidable impacts because of development should be mitigated against. The retention and enhancement of trees, woodland and hedgerows, as well as the requirement for mitigation, will be addressed within the Deposit Plan.</p>	<p>No amendment is required.</p>

## Policy PS10: Managing Employment Growth

Objections raised	Council Response	Recommendation
<p>The provision of employment land does not guarantee take-up, especially in a weak economic climate. Businesses will need encouragement to invest.</p>	<p>The area of land proposed to be allocated for employment use has been determined by calculating the employment land requirement over the period of the 2RLDP (2020-235) using the method(s) set out in Technical Advice Note 23: Economic Development, and the associated practice guidance. This process takes account of projected employment growth, or decline, on a sectoral basis over the course of the plan period. The findings of this are summarised in the PS14 - Employment Background Evidence Paper.</p> <p>The role of the 2RLDP is to set the policy framework, at the local level, for the regulation of development. Insofar as it is able to convey a degree of certainty in terms of the suitability of particular sites for particular uses, it can help encourage business development. However, in addition to this, the Council will continue to assist this process through the exercise of its economic development functions.</p>	<p>No amendment is required.</p>
<p>Policy PS10 allocates 44.5 ha of employment land but is silent on what sites will be allocated to meet the need. The Council must ensure that employment sites are deliverable and explain how they are sustainably located and how they relate to proposed housing allocations.</p>	<p>Policy PS10 is a strategic policy and, as such, does not allocate specific sites. Suggested allocations (as well as a suite of policies designed to complement PS10) is set out in PS14 - Employment Background Evidence Paper. Those sites identified have been assessed by the Employment Land Review (PS16) although it is accepted that further assessment work will be required in some instances. It is intended that this will be undertaken in order to inform the Deposit Plan.</p>	<p>No amendment is required.</p>

## Policy PS11: Managing Tourism Growth

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<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>It is agreed that the Deposit Plan should include policies that demonstrate the role sustainably accessed heritage has in contributing to “Managing Tourism Growth”. However, it is considered that the policy relating to this should be more nuanced. iii. the new policy PS11 D should read “Reducing impacts on the County Borough’s natural environment, heritage and landscape while providing benefit to the foundational economy and the well-being of tourists and local communities”. This new policy would recognise the wider contribution of a well-managed natural environment, heritage and landscape.</p> <p>Thought needs to be given to those tourist attractions for which provision will be made.</p>	<p>Policy PS11 criterion D presently mentions “the protection and enhancement of the County Borough’s natural and historic assets”. This is not considered to be discernibly different from the proposed amendment, certainly in terms of practical application. The concept of the foundational economy is a cross-cutting one that potentially impacts upon economic development, housing, infrastructure, energy generation and other areas. Therefore, Policy PS11 is not considered the most appropriate place for reference to it. Criteria A-C, as presently worded, refer to those local economic and infrastructural elements that have a clear relationship to tourism.</p> <p>While Policy PS11, along with national policy and Future Wales, will establish the context for more detailed proposals concerning the provision, protection and enhancement of tourism-related facilities, which will be set out within the Deposit Plan.</p>	<p>No amendment is required.</p>



**Policy PS12: Managing Housing Growth**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Renovate existing houses instead of building new houses.</p> <p>Preferred Strategy should put more emphasis on reusing vacant buildings and previously developed land.</p> <p>Housing provision should be on brownfield sites and re-purposed buildings.</p>	<p>There is not a significant level of long-term empty properties in the County Borough and the Council has a dedicated team addressing these properties, bringing them back to beneficial use. Due to the low number of long-term empty houses the contribution such buildings would make to the overall land supply is very small. It should also be noted that a healthy housing market would see a natural empty property level of around 3%, so some empty properties are required to enable market churn.</p> <p>Caerphilly has the lowest dwelling vacancy rate of all local authorities in South East Wales, with the ratio for the South-East Wales region equating to 1.045. For the purposes of calculating the number of dwellings for households, an assumption of 1.037 as a conversion ratio for vacancies has been factored in account for vacant stock.</p> <p>Environmental issue En5 (in the 'Key Land Use Issues' section) looks to utilise brownfield land before greenfield land in the first instance. This approach is consistent with national policy.</p>	<p>No amendment is required.</p>
<p>Local young people should be prioritised for housing.</p> <p>The Council should give preferential status to local builders.</p>	<p>While there are specific measures that the Council may be able to take in respect of housing provision for young people and assisting local enterprise, these are beyond the remit of the 2RLDP. Nonetheless, it is considered that the housing land requirement put forward in the Preferred Strategy, and the allocation of sites to enable this to be realised, will play a major role in satisfying demand for new housing, and addressing housing need in communities across the County Borough for all age groups.</p>	<p>No amendment is required.</p>
<p>Proposed housing figures not supported by evidence. Too much growth proposed for Ystrad Mynach.</p>	<p>The level of housing growth in the plan was identified through the engagement process. The evidence and considerations associated with this are set out in detail in PS4 - Population and Housing Growth Options.</p> <p>The only development proposed as part of the Preferred Strategy is the development associated with the Strategic Site at Maesycwmmer, and the</p>	<p>No amendment is required.</p>

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	<p>identified amount of development for the plan period amounts to around 18% of the total new housing requirement. The remainder of the allocations to deliver the requirement will be identified in the Deposit LDP. With over half of the remaining housing requirement and the other land use requirements to be identified in the Deposit Plan it is not possible to say that there is too much development in this area.</p>	
<p>Housing requirement is too small. Preferred Strategy cannot be considered a 'growth strategy'. Council should reconsider growth scenarios with FW's national growth area in mind.</p>	<p>The level of housing growth in the plan was identified through the engagement process. The evidence and considerations associated with this are set out in detail in PS4 - Population and Housing Growth Options. This includes the County Borough's position within the Cardiff, Newport and the Valleys national growth area as set out within Future Wales, as well as the implications of the Cardiff Capital Region's aspirations for job creation and economic growth.</p>	<p>No amendment is required.</p>

**Policy PS13: Affordable Housing Target**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>So-called affordable housing should take account of local needs.</p> <p>Need to build more houses of every kind to get more affordable houses.</p>	<p>The level of housing growth in the plan was identified through the engagement process. The evidence and considerations associated with this are set out in detail in, PS4 - Population and Housing Growth Options.</p> <p>The process taken with regard to determining the level of housing growth overall, as well as affordable housing, is set out in PS4 - Population and Housing Growth Options, although the affordable housing target may change as a result of viability work and the preparation of the up-to-date Local Housing Market Assessment. It is a requirement that the Council demonstrates that its allocations are viable and can be delivered during the plan period and as such the delivery of the housing and affordable housing requirements should be met. It is envisaged that some sites will be delivered by registered social landlords, or through the Council house-building programme being undertaken by Caerphilly Homes. This is a consideration of the candidate site assessment process.</p>	<p>No amendment is required.</p>



**Policy PS14: Sustainable Transport Hierarchy**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Make it easier and safer for people to cycle in the Borough.</p> <p>Road networks cannot accommodate more cyclists.</p>	<p>The Council intends to make cycling safer and easier for people. It has recently updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and new routes. The Welsh Government has approved the ATNM.</p> <p>Neither the Council nor the Welsh Government believe that road networks cannot accommodate more cyclists. Cycling is three tiers above private motoring in the 'sustainable transport hierarchy for planning' (see p. 48 of Planning Policy Wales, Edition 11, February 2021). Cyclists are entitled to use most public highways, and it sometimes makes sense to reallocate road space to a method of transport that is comparatively safe, clean, quiet and healthy.</p>	<p>No amendment is required.</p>
<p>Electric vehicles may not be cheap to run.</p>	<p>While the cost of using electric vehicles is not directly related to the 2RLDP, any policies included within the plan, once adopted, will be subject to monitoring. This will allow future iterations of the plan to have regard to underlying factors that may have an impact on policy implementation, and to take account of these through the review process.</p>	<p>No amendment is required.</p>

**Policy PS15: Modal Shift**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Make it easier and safer for people to cycle in the Borough.</p>	<p>The Council intends to make cycling safer and easier for people. It has recently updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and new routes. The Welsh Government has approved the ATNM.</p>	<p>No amendment is required.</p>

**Policy PS16: Transport Improvement**

<b>Comments in Support</b>	<b>Council Response</b>
<p>Cycle/footpath – Establish a north-south route using the former railway line to link the cycle paths going east-west at Maesycwmmmer and Caerffili, also linking in to Llanbradach.</p> <p>There is an explicit need for active travel routes between Caerphilly and Ystrad Mynach. this is the perfect opportunity to use the old Brecon/Merthyr railway line from Maesycwmmmer to Trethomas to link up with the current route to Machen.</p> <p>Active-travel routes and public transport should connect the borough to Newport.</p>	<p>The comments made in support and the suggestions made are noted. The Council will review its updated Integrated Network Map (INM) after several years. Cross-boundary routes, however desirable, may take some time to create.</p>

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Strategic site: proposal to close Pandy Road to vehicular traffic in the interests of pedestrian and cyclist safety.</p> <p>Ban cars in town centres to 'incentivise' people to change their transport habits.</p> <p>Public-transport projects need not always be Metro-sized.</p>	<p>With respect to the Strategic Site, aspects such as highways safety have been considered as part of the candidate site assessment. However, specific proposals will be subject to the planning application process and will be considered in detail at this juncture.</p> <p>A number of internal and external stakeholders have been involved in preparation of the Preferred Strategy, including Transport for Wales and the Council's Highways department. Discussions are ongoing in respect of specific proposals that may come forward, either through the Metro initiative or by other means, and the 2RLDP will seek to give effect to such proposals in land-use terms as appropriate. This may include improvements to existing stations.</p> <p>The Metro will play a key role in terms of increasing the frequency of journeys on the Rhymney Valley Line and, in this way, will have a positive impact on Caerphilly Basin in terms of increasing regional connectivity. Allied to this, the Caerphilly Town 2035 proposals continue to be progressed, central to which is</p>	<p>No amendment is required.</p>

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<p>Improve cycling facilities on trains and at railway stations.</p> <p>South Wales Metro will have no positive effect on the Caerphilly basin.</p>	<p>the development of a new public transport interchange in Caerphilly town centre.</p> <p>Any proposal to ban or restrict cars from a particular location would fall outside the remit of the 2RLDP.</p>	
<p>Caerphilly-Newport railway unlikely to be reopened.</p>	<p>PS11 - Transport Background Evidence Paper sets out that as part of the Sewta Rail Strategy Review (2013), the opportunity to review the feasibility of bringing the former Caerphilly to Newport rail line (Machen Line) back to beneficial use was undertaken. This study concluded that it was possible and the issue of protecting this route for future use needed to be considered, noting that further work should be undertaken to optimise the business case for the scheme. The reinstatement of this line also meets the aspirations of the South Wales Metro concept which includes a metro link from Caerphilly to Newport as one of its longer-term projects. As a result, Policy PS17 provides the policy basis for safeguarding former rail routes for future transport use and Policy PS18 seeks to protect the Caerphilly to Newport rail line for the reinstatement of passenger services.</p>	<p>No amendment is required.</p>

**Policy PS17: Safeguarding Former Rail Lines**

<b>Comments in Support</b>	<b>Council Response</b>
<p>Support for protecting former rail lines. There needs to be increased connectivity between Caerphilly and Ystrad Mynach and Caerphilly and Newport for sustainable transport and active travel. The conversion of the old railway lines for cycling/walking routes provides the best chance of this.</p> <p>Support for protecting former rail lines:</p> <ul style="list-style-type: none"> <li>○ Propose a footpath/cycleway on sections of old railway between Maesycwmmmer and Trethomas and between Machen and Caerphilly.</li> <li>○ Protect land east of Llanbradach as a cycle/walking path.</li> </ul>	<p>The comments made in support are noted.</p> <p>The Active Travel Act makes provision for the mapping of active travel routes and related facilities through the Active Travel Network Maps (ATNM). The ATNM for Caerphilly County Borough forms part of the evidence base for the 2RLDP.</p> <p>Policy PS17 safeguards the routes of former railway lines that have the potential for transport related development particularly those that facilitate walking, cycling, rail freight or passenger movements.</p>

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<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
Protect land east of Llanbradach as a cycle/walking path.	The Council has recently updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and new routes. The Welsh Government has approved the ATNM. The Council will review the map after several years.	No amendment is required.

**PS18: Protecting Strategic Transport Routes**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Cross-valley rapid transport route from Pontypool to Pontypridd is essential.</p> <p>Need a passenger rail service between Machen and Newport.</p>	<p>As referenced in PS11 - Transport Background Evidence Paper, Transport for Wales have commissioned a study to improve public transport connectivity in the Mid Valleys area, from Bridgend, through Pontypridd and Blackwood towards Cwmbran. The focus of the study will be on public transport options including bus and Bus Rapid Transit (BRT), rail, including heavy rail and light rail such as trams, and interchange opportunities and improved integration. If there is a need for protection of land as the study progresses, this will be considered as part of the Deposit Plan.</p> <p>PS11 - Transport Background Evidence Paper also sets out that as part of the Sewta Rail Strategy Review (2013), the opportunity to review the feasibility of bringing the former Caerphilly to Newport rail line (Machen Line) back to beneficial use was taken. This study concluded that it was possible and the issue of protecting this route for future use needed to be considered, noting that further work should be undertaken to optimise the business case for the scheme. The reinstatement of this line also meets the aspirations of the South Wales Metro concept which includes a metro link from Caerphilly to Newport as one of its longer-term projects. As a result, Policy PS17 provides the policy basis for safeguarding former rail routes for future transport use and Policy PS18 seeks to protect the Caerphilly to Newport rail line for the reinstatement of passenger services.</p>	<p>No amendment is required.</p>

**Policy PS19: Road Hierarchy**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Road hierarchy needs to ensure that active travel is prioritised.</p> <p>Should try to reduce reliance on private cars by allocating more road space to cycling.</p>	<p>The establishment of a road hierarchy as identified in Policy PS19 will facilitate the efficient use of the highways network by ensuring that traffic is channelled onto the most appropriate routes in order to maintain appropriate environmental, amenity and safety conditions. Maintaining an efficient and safe highway network will assist public transport services in the form of buses, maintaining their frequency and ensuring that they run to schedule.</p> <p>The Preferred Strategy contains a number of other policies intended to reduce reliance on private cars and encourage active travel, namely:</p> <ul style="list-style-type: none"> <li>• Policy PS14: Sustainable Transport Hierarchy that ensures proposals prioritise walking and cycling over other forms of transport;</li> <li>• Policy PS15: Modal Shift which supports and encourages modal shift;</li> <li>• Policy PS16: Transport Improvement which lists a number of measures to improve the transport network, including improving sustainable transport provision and the active travel network.</li> </ul>	<p>No amendment is required.</p>



**Policy PS22: Minerals**

<b>Comments in Support</b>	<b>Council Response</b>
<p>A planning authority's requirement to protect its known mineral resource is highlighted; in addition, a flexible policy approach is suggested to ensure a plan is positively prepared and supports applications for new mineral development and continuity in aggregate supply. PPW makes clear the importance of safeguarding known mineral resource within Local Plans and highlights the role in which mineral plays in the wider plan goals and economy. We welcome future discussion with the Council regarding Hafod Fach Quarry.</p>	<p>The comments made in support are noted. The Council looks forward to future discussion regarding specific minerals sites.</p>

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Amend 7.38 to take account of PPW requirements, and to reflect differences between mineral reserves and mineral resources:</p> <p>"It is a statutory requirement for the Council to maintain an adequate supply of minerals and maintain a minimum 10-year land bank of permitted aggregate reserves throughout the plan period. To do this, the Council will protect existing minerals resources, reserves and</p>	<p>The Council is aware of its statutory requirements as regards the supply of aggregates. However, it is accepted that there is a distinction between mineral reserves and resources. The changes to para. 7.38 illustrate this as well as being consistent with Policy PS22, and the proposed amendment is therefore considered acceptable.</p>	<p>Make amendments to para 7.38, to read as follows:</p> <p>"It is a statutory requirement for the Council to maintain an adequate supply of minerals and maintain a minimum 10-year land bank of permitted aggregate reserves throughout the plan period. To do this, the Council</p>

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<p>infrastructure from inappropriate development and ensure sufficient reserves have been permitted to provide the 25 years' worth that would ensure a minimum 10-year land bank at the end of the plan period."</p>		<p>will protect existing minerals resources, reserves and infrastructure from inappropriate development and ensure sufficient reserves have been permitted to provide the 25 years' worth that would ensure a minimum 10-year land bank at the end of the plan period."</p>
<p>PS22 should make reference to high specification aggregate (HSA) to ensure it remains available in the national interest and should also refer to the need for local materials to adhere to the local vernacular. The policy should read: "The Council will contribute to local, regional and national demand for a continuous</p>	<p>The proposed amendment to Policy PS22 concerns specific reference being made to the safeguarding of minerals infrastructure, as well as minerals themselves; the maintenance of HSA reserves; and the supply of local construction materials. It is accepted that PPW makes reference to "national, regional and local demand" and therefore it is considered appropriate for the "regional" reference to be deleted, thereby ensuring that demand in a general sense is addressed, without replicating national policy. PPW also requires that minerals infrastructure is safeguarded and therefore criteria a) and b) as worded above are considered acceptable.</p> <p>PPW affords significant weight to the need for HSA aggregates and requires potential HSA resources to be identified. However, it is considered that this can be accomplished within the existing terms of the policy. There is no requirement for a 10-year land bank of HSA aggregates as distinct from the land bank required for crushed rock. Therefore, it is considered that the inclusion of proposed criterion c) is unnecessary.</p>	<p>Policy PS22 be amended to read as follows: "The Council will contribute to demand for a continuous supply of minerals by: a) Safeguarding known resources of sand, gravel, crushed rock and minerals infrastructure;</p>

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<p>supply of minerals by: a) Safeguarding known resources of coal, sand, gravel, hard rock and minerals infrastructure; b) Maintaining a minimum 10-year land bank of permitted aggregate reserves throughout the plan period; c) Maintaining a minimum 10-year land bank of nationally important high specification aggregate reserves throughout the plan period; d) Maintaining a supply of local construction materials; e) Encouraging the efficient and appropriate use of high quality minerals and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary land-won resources."</p>	<p>Proposed criterion d) concerning the supply of local construction materials does not take account of the fact that the aggregates market operates on a regional or national basis, and therefore while LDP policy can help ensure a local supply of aggregates, it cannot intervene with respect to the geographical distribution of market-led transactions. Consequently, it is not considered that the inclusion of this criterion would be particularly effective in practical terms, either in its own right or by means of influencing more detailed policies/proposals that might be set out in the Deposit Plan. However, the importance of local vernacular is not to be diminished, and placemaking/design policies will be able to consider how best it might be incorporated.</p>	<p>b) Maintaining a minimum 10-year land bank of permitted aggregate reserves throughout the plan period; c) Encouraging the efficient and appropriate use of high-quality minerals and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary land-won resources." In addition to the proposed changes, there is no longer any requirement to safeguard coal resources. Therefore, reference to "coal" in criterion a) should be deleted. Reference to "hard</p>
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		rock” should be changed to “crushed rock.”)
Some extant planning permissions are due to expire in 2042. The Council needs to consider the implications of this in its evidence base and ensure there is policy support to maintain supply and production capacity for a minimum of ten years beyond the end of the plan period.	The Council is aware of the expiry dates of those minerals permissions that remain extant within the County Borough. The implications of this will be taken account of in terms of the evidence base.	No amendment is required.

**Background Evidence, PS1 - Strategy Options Assessment**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
Too little emphasis on development in the north of the Borough.	The socio-economic issues associated with the Heads of the Valleys area of the County Borough are an important consideration for the policy framework. In considering the strategy to be used for the emerging 2RLDP the Council considered 6 alternatives, one of which was to focus development within the HoVRA to stimulate growth and regeneration in the area. However, it is a requirement that the Council can demonstrate that the sites it allocates in the plan are viable and deliverable. As considered in PS1 - Strategic Options Assessment, Option 2 – Heads of the Valleys Regeneration Area (HOVRA) Focus, the disadvantages note that low land values and house prices in the area mean that there are significant issues in respect of its viability and deliverability, and it would not be possible to allocate significant land in this area and demonstrate that it can	No amendment is required.

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	<p>be delivered. The plan acknowledges this and whilst it would not be possible to include sites whose viability and deliverability is questionable within the formal land requirements; sites can be identified in this area as desire sites that would not form part of the overall land requirement calculations. Consequently, whilst the Preferred Strategy does not specifically direct development to the HOVRA the Deposit Plan will allocate sites in this area to seek to address its issues.</p>	
<p>Housing built for commuters will increase pollution.</p>	<p>The housing land requirement proposed by the Preferred Strategy is aligned with the level of proposed employment land. Approaches to the calculation of each are set out in the respective background papers. As a result, the level of new housing is not intended to be “housing built for commuters” but, instead, to serve the needs of an economically sustainable resident population, benefitting from the provision of local employment opportunities.</p> <p>While it is accepted that a degree of out-commuting will remain due to the regional nature of the economy and the primacy of Cardiff and, to a lesser degree, Newport, the opportunities provided within the County Borough for employment development will seek to reduce this. In addition, improvements to the public transport network as a result of the Metro initiative and improvements to the active travel network while increasing connectivity, will reduce reliance on car-borne travel and have a positive environmental impact.</p>	<p>No amendment is required.</p>

## Background Evidence, PS4 - Population & Housing Growth Options

Objections raised	Council Response	Recommendation
<p>PS4 - Population and Housing Growth Options was prepared before the results of the 2021 census were released.</p> <p>Latest population figures do not support proposal for strategic site.</p>	<p>Whilst PS4 - Population and Housing Growth Options was produced before the first outputs from the 2021 Census were released in June 2022, a further background paper PS18 - Census 2021 and the implications for the 2nd Replacement Local Development Plan was produced in October 2022 and this sets out the potential implications of the lower base population and number of households on the evidence base for the 2<sup>nd</sup> Replacement LDP.</p> <p>It concludes that The Census 2021 reinforces some of the key concerns that have been identified as part of the 2RLDP evidence base, including the imbalance in the population with an ageing population and declining working and school age population, and the high average household size, which is linked to the affordability of housing.</p> <p>The Census is only a snapshot of the population and is not a forecast, although comparisons and trends will undoubtedly be drawn between this data and previous Censuses. The fact that the population is lower than the 2RLDP is planning for is a concern as the reasons for it are not understood, but this in itself does not undermine the validity of the scenarios that the plan has considered as ultimately, the 2RLDP considers the land use implications of population, household and dwelling change over time. This change is influenced by policy decisions on the level of growth that should be accommodated to address the challenges faced and Caerphilly's location within a Future Wales Growth Area, rather than simply allowing past trends to continue. As a consequence, the preferred level of growth is considered to remain appropriate.</p>	<p>No amendment is required.</p>

**Background Evidence, PS9 - Candidate Sites Register (Part 1)**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
<p>Objection to proposed housing sites on greenfield land in Ystrad Mynach, Maesycwmmmer, Penpedairheol, Hengoed, Penybryn and Cefn Hengoed due to lack of infrastructure, traffic, drainage, ecology, value of green spaces, capacity of health services and schools. Brownfield sites should be used first.</p> <p>Objection to any further development in Caerphilly Basin due to air quality, congestion, lack of infrastructure, poor water pressure and impact on health and well-being.</p> <p>Object to land near Van mansion CB027.</p>	<p>PPW outlines that development on brownfield sites should be prioritised over greenfield development where possible and the 2RLDP has been prepared in accordance with this. However, while PPW is clear that previously developed land should be utilised in preference to greenfield (paragraph 3.55), it also states that not all such sites will be suitable for redevelopment due to contamination, its unsustainable location or the potential for constraints to be imposed upon existing, adjacent activities. The adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land and, as a result much of the remaining brownfield land is either unviable, poorly located or inappropriate for redevelopment. Therefore greenfield land release is also required in order to meet the growth requirements for the County Borough over the plan period.</p> <p>The Preferred Strategy sets out the overarching framework within which detailed sites will be identified to meet the plan requirements. The detailed sites will be set out in the Deposit plan. Consequently the only site identified for development in the Preferred Strategy is the Strategic Site at Maesycwmmmer due to its size and importance. The sites that are being considered for inclusion in the Deposit Plan are the subject of ongoing assessment work that will address the issues raised in the objections and the sites will only be identified in the plan if they are the most suitable for development.</p>	<p>No amendment is required.</p>

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**Background Evidence, PS10 - Candidate Site Assessment Summary**

<b>Objections raised</b>	<b>Council Response</b>	<b>Recommendation</b>
Preferred Strategy needs to take a clearer approach to the protection of BMV agricultural land.	<p>The implication of a hybrid approach strategy which seeks to focus development in relation to town centres and public transport nodes will be that more rural, peripheral parts of the County Borough (where agricultural undertakings are more prevalent and where 'best and most versatile' (BMV land may exist) are protected from 'urban' land uses.</p> <p>Furthermore, the assessment of candidate sites has considered the issue of (BMV) agricultural land as part of the assessment questionnaire. All sites were assessed, and where necessary, an Agricultural Land Classification Survey was requested to evidence whether the land was BMV land.</p>	No amendment is required.



**Background Evidence, PS10 - Candidate Site Assessment Summary Appendix 1**

Objections raised	Council Response	Recommendation
Object to land near Van Mansion being used as housing CB027.	The Preferred Strategy sets out the overarching framework within which detailed sites will be identified to meet the plan requirements. The detailed sites will be set out in the Deposit plan. Consequently the only site identified for development in the Preferred Strategy is the Strategic Site at Maesycwmmer due to its size and importance. The sites that are being considered for inclusion in the Deposit Plan are the subject of ongoing assessment work that will address the issues raised in the objections and the sites will only be identified in the plan if they are the most suitable for development.	No amendment is required.

**Background Evidence, PS14 - Employment Background Evidence Paper**

Comments in Support	Council Response
The continued safeguarding of EM2.30 is supported.	The comment made in support is noted.

**Appendix 1: Preferred Strategy Policies - Wider Policy Fit**

Objections raised	Council Response	Recommendation
<p>The wider fit policy needs to cover the cultural aspects of the Well-Being Act and the preservation of old railway lines for sustainable transport routes.</p>	<p>Appendix 1 seeks to identify how the Preferred Strategy Policies reflect and accord with higher level policies and objectives, to demonstrate that they are an integral part of the policy framework. The Appendix considers the Preferred Strategy Policies against the following, identifying what elements the policy framework covers:</p> <ul style="list-style-type: none"> <li>• Future Wales Policies</li> <li>• National Sustainable Placemaking Outcomes</li> <li>• Building Better Places Issues</li> <li>• Well-Being Act Goals</li> <li>• Well-being Plan Objectives</li> <li>• Corporate Plan Objectives</li> </ul> <p>Policies PS17 and PS18 provide the policy basis for protecting former rail routes for future transport use under Paragraph 7.34, whilst the Well-being Cultural Goals and Objectives are included under relevant policies in the Appendix, e.g. PS11.</p>	<p>No amendment is required.</p>

## ANNEX 3: COMMENTS ON INTEGRATED SUSTAINABILITY APPRAISAL (ISA)

In total 4 representations were made in respect of the Initial ISA Report and the ISA Scoping Report. Of those, 1 was in support and 3 raised an objection. Appendix 2 lists the representor and representation numbers.

A response to the issues raised is provided as follows:

### Initial ISA Report and ISA Scoping Report

Comments in Support	Council Response
<p>The Integrated Sustainability Appraisal Scoping Report encompasses a variety of elements which contribute to the area as a whole, including archaeology and the historic environment, in Chapter 9. The ISA takes into account the strategic cascade of legislation and policy, and the inclusion of these into the LDP to ensure that the measures to protect and enhance the historic environment are undertaken. It is noted that further reference to current legislation and policy relating to the historic environment: the Historic Environment (Wales) Act 2016; and TAN24: The Historic Environment, is included, as well as statutorily protected (Scheduled and Listed) designated historic assets.</p>	<p>Support for the historic environment elements of the ISA undertaken to date is noted.</p>

Objections raised	Council Response	Recommendation
<p>One of the ISA objectives (Table 3.1) is 'To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and protecting, where possible, higher grade agricultural land'. This objective should give 'considerable weight' to protecting best and most versatile (BMV) agricultural land as per PPW 3.58. The appraisal of the spatial strategy options is unclear as to how</p>	<p>It would not be expected that an issue such as BMV land, which, by nature, is site specific and particularly localised, would inform the development or consideration of strategic options other than where sites arising as a result of those options are to be considered. However, this does not mean that the issue has been overlooked. Indeed, the implication of a hybrid approach which seeks to focus development in relation to town centres and public transport nodes will be that more rural, peripheral parts of the County Borough (where agricultural undertakings are more prevalent and where BMV land may exist) are protected from 'urban' land uses.</p>	<p>No amendment is required to the ISA Scoping Report or Initial ISA Report. Within the subsequent version of the ISA Report, amend objective to read as follows:</p>

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<p>BMV policy has been considered in practice.</p> <p>ISA Scoping Report - Section 7.14 notes the distribution of agricultural land classification (ALC) grades (as per Predictive map) for the County Borough - this is welcome. However, WG disagrees with paragraph 7.30 (6th bullet point) - 'The majority of land in the County Borough is not suitable for agricultural uses due to its lower quality agricultural grading; however, there are some small areas of higher quality land at Draethen'. The ALC system reflects the limitations in the capability of land for agricultural uses – land in lower grades would still be suitable for agricultural use, but flexibility and cropping choice may be limited.</p> <p>There is concern how land quality information is also considered for Strategic Policy EN9 (Minerals – 10yr land bank) and EN1 (Renewable Energy). This needs to be considered and evidenced together with all other allocations in terms of impacts on the BMV resource over the plan period and how PPW 3.58 and 3.59 is applied.</p>	<p>In relation to the ISA objective, it is not considered that the wording presently used is counter to national policy as set out in PPW. However, the respondent's position is noted and the wording of the objective in the subsequent version of the ISA Report will be amended.</p> <p>Disagreement with para. 7.30 of the Scoping Report is noted. It is not the Council's intention to amend the Scoping Report, which was consulted upon prior to the Pre-Deposit Plan consultation stage. However, comments made in relation to the ISA will influence the ISA process and be reflected, where necessary, in the subsequent version of the ISA Report.</p> <p>EN1 and EN9 are environmental issues that help to provide the context for the strategic policies which, in this case, are represented by PS7 (Renewable Energy) and PS22 (Minerals) respectively. These are not detailed policies but merely transpose <i>the requirements of national policy and Future Wales to the local scale and, in the case of PS22, highlight statutory and national policy requirements</i>. Clearly, the 2RLDP is being prepared within the context of PPW and land quality information, where relevant, will be considered as part of the evidence base in terms of the formulation of more detailed policies that may be set out within the Deposit Plan, and associated site allocations and designations.</p>	<p>"To make the best use of previously developed land and existing buildings to minimise pressure for greenfield development and to give considerable weight to the protection of the best and most versatile (BMV) agricultural land.</p>
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## **ANNEX 4: COMMENTS ON THE STRATEGIC SITE (PARC GWERNAU, MAESYCWMMER)**

In total 468 representations were made in respect of the Parc Gwernau strategic site. Of those, 8 were in support and 460 raised an objection.

Appendix 2 lists the representor and representation numbers.

The representations are grouped into the following key issues and an initial response is provided under these key issue headlines.

- General Issues
- Vision, Aims and Objectives
- Strategic Growth and Strategy Options
- Settlement Hierarchy
- National, Regional and Local Context
- Greenfield Development
- Stages/Timing of Development
- Design and Visual Impact
- Effect on character of village and other settlements
- Amenity
- Housing
- Traffic and Transport
- Climate, Energy and Environment
- Green Infrastructure
- Biodiversity, Ecosystem Resilience and Habitats
- Landscape
- Trees, woodland and hedgerows
- Public Footpaths/rights of way
- Flooding and Drainage
- Health Infrastructure

- Education
- Sports/Recreation/Tourism
- Heritage and Historical Assets
- Waste
- Minerals
- Mining history
- Other

## General

Issues Raised	Council Response
<p>Not a fully integrated plan – no clear, costed and coordinated plan to develop infrastructure.</p> <p>Proposal lacks detail.</p> <p>Maesycwmmmer should be ‘planned as a single village’.</p> <p>Danger of over-urbanisation.</p> <p>Site is at odds with policies relating to co-location of different uses.</p> <p>Plans do not show proposals already approved near the site.</p>	<p>The purpose of the 2RLDP, with respect to the allocation of the Maesycwmmmer Strategic Site, will be to establish the principle of development on that site for the uses proposed. This does not imply or pre-suppose the granting of planning permission, and the planning application process will still need to be followed with respect to proposals that may come forward following the site’s allocation. However, in ensuring that the site is capable of incorporating a complementary and sustainable mix of uses and the relevant infrastructure, engagement has taken place between the site promoters, the Council and external service providers such as the health board. Proposals will be required to ensure that all applicable planning considerations are satisfied and will be assessed in relation to national and local policies regarding environmental impact, infrastructure provision and amenity, as well as the role and function of Maesycwmmmer within the settlement hierarchy.</p> <p>Where planning permission has been granted in relation to adjacent sites, this has been factored into the 2RLDP evidence base in terms of the spatial options considered and, where relevant, the housing land requirement. Such sites will also be considered in respect of the review of settlement boundaries, which will be undertaken prior to consultation on the Deposit Plan.</p>

## Vision, Aims and Objectives

Issues Raised	Council Response
<p>Strategic site goes against 'vision' and 'aims' of Preferred Strategy ('town centres first', for instance).</p>	<p>At the heart of the vision and aims of the Preferred Strategy is the need to maintain a sustainable economic population structure in order to support local communities and foster economic growth, and the provision of sufficient market and affordable housing in sustainable locations. Allied to this is an increased emphasis on the delivery of green and blue infrastructure and the protection of landscape and biodiversity for both health and well-being and nature conservation purposes.</p> <p>The proposed strategic site is located in the A472 corridor and is considered to be a sustainably located site being within walking distance of a railway station and cycling distance to 2 Principal Town Centres and 1 Local centre and in easy reach of 2 railway stations, one on the Rhymney Valley rail line and one on the Ebbw Vale rail line. It therefore is a sustainable location and adheres to each element of the hybrid approach that was chosen for the Preferred Strategy, as well as the vision and aims. While details of any proposed scheme will be dependent on the planning application process, the need for green infrastructure and the protection of biodiversity will be key considerations.</p>

## Strategic Growth and Strategy Options

Issues Raised	Council Response
<p>No justification why GB022 warrants a strategic site allocation other than to deliver a new road.</p> <p>The 51 other candidate sites that are considered 'suitable' should be considered as an alternative strategy.</p> <p>Development should be 'focused north of Bargoed'.</p> <p>Over reliance on strategic site as part of the proposed replacement plan.</p> <p>Disproportionately large proposal, not justified by latest census.</p>	<p>The Strategic Site has been identified as such because of its size and its importance in delivering the overall strategy, not because it provides a much-needed highway improvement for the Maesycwmmmer stretch of the A472.</p> <p>While the allocation of the Strategic Site would enable a highway improvement to address the issue of congestion on the A472, it is also a sustainably located site that is being considered for inclusion in the plan. In addition to this the Strategic Site will provide a level of development capital that will enable community benefit to be delivered across a much wider area than just the site itself, including facilitating improvements to health provision, education provision and actively delivering modal shift through a range of sustainable transport measures. As a result the site closely accords with the Town Centre First and Metro Focus pillars that comprise the other elements of the overall hybrid strategy.</p> <p>In considering the strategy to be used for the emerging 2RLDP the Council considered 6 alternatives, one of which was to focus development on the Heads of the Valleys area to stimulate growth and regeneration in the area. However, it is a requirement that the Council can demonstrate that the sites it allocates in the plan are viable and deliverable. As considered in PS1 – Strategic Options Assessment, Option 2 – Heads of the Valleys Regeneration Area (HOVRA) Focus, the disadvantages note that low land values and house prices in the area mean that there are significant issues in respect of its viability and deliverability, and it would not be possible to allocate significant land in this area and demonstrate that it can be delivered. The plan acknowledges this and whilst it would not be possible to include sites whose viability and deliverability is questionable within the formal land requirements; sites can be identified in this area as desire sites that would not form part of the overall land requirement calculations. Consequently, whilst the Pre-Deposit Plan does not specifically direct development to the HOVRA, the Deposit Plan will allocate sites in this area to seek to address its issues.</p>



It is accepted that a significant proportion of the housing growth for the plan period is identified at the strategic site in Maesycwmmmer and it is accepted that the delivery of the site is fundamental to the delivery of the strategy overall. However, the allocation of a strategic site provides the opportunity to generate a level of development capital that could be used to provide benefits to the existing communities in a wider area than just within the site boundaries, including sustainable transport issues, education and health provision. These considerations are set out in more detail in paragraphs 7.8 to 7.14 of the Pre-Deposit Plan and inPS1 – Strategy Options Assessment. The consortium that is proposing the site has provided a wide range of evidence supporting the allocation of the site, which includes viability evidence that demonstrates that the site is both viable and deliverable.

The evidence base in respect of the 2RLDP’s proposed level of growth, and the associated housing land requirement, is set out in PS4 - Population and Housing Growth Options. A series of growth scenarios were considered which used the 2018-based Welsh Government population and household projections as their starting point. Scenario J was ultimately chosen as the preferred scenario as it aims for a sufficient increase in the working age population, over and above that set out in the projections, to support the Council and the Cardiff Capital Region (CCR) jobs target for South East Wales and represents a mid-point between the adopted LDP’s annual housing requirement and the past build rates figure. Relying on the projections alone would amount to planning for economic decline, which would not be sustainable.

Whilst PS4 - Population and Housing Growth Options was produced before the first outputs from the 2021 Census were released in June 2022, a further background paper PS18 - Census 2021 and the implications for the 2nd Replacement Local Development Plan was produced in October 2022 and this sets out the potential implications of the lower base population and number of households on the evidence base for the 2RLDP.

It concludes that the 2021 Census reinforces some of the key concerns that have been identified as part of the 2RLDP evidence base, including the imbalance in the population with an ageing population and declining working and school age population, and the high average household size, which is linked to the affordability of housing.

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	<p>The Census is only a snapshot of the population and is not a forecast, although comparisons and trends will undoubtedly be drawn between this data and previous Censuses. The fact that the population is lower than the 2RLDP is planning for is a concern as the reasons for it are not understood, but this in itself does not undermine the validity of the scenarios that the plan has considered as ultimately, the 2RLDP considers the land use implications of population, household and dwelling change over time. This change is influenced by policy decisions on the level of growth that should be accommodated to address the challenges faced and Caerphilly County Borough's location within a Future Wales Growth Area, rather than simply allowing past trends to continue. As a consequence, the preferred level of growth is considered to remain appropriate.</p>
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### Settlement Hierarchy

Issues Raised	Council Response
<p>The site is not an extension to Maesycwmmmer, but rather a new settlement which would be much larger than the existing village.</p> <p>Not a sustainable site given Maesycwmmmer is neither a principal nor a local centre.</p>	<p>The Strategic Site is not a new settlement as it builds on the existing settlement of Maesycwmmmer and as such is an, albeit significant, extension of the settlement. It is not uncommon for small settlements to grow into much larger ones, in fact all of the large towns in the county borough have done just that.</p> <p>PS3 – Settlement Role, Function and Sustainability Analysis sets out the reasoning behind the allocation of a Strategic Site at Maesycwmmmer and how it fits in with the settlement hierarchy and how it relates to the existing centres and Metro nodes. The site in Maesycwmmmer represents the only realistic opportunity to deliver a scheme that can address a wide range of issues that are wider than just the site itself and the wider benefits that a large development can deliver.</p>

### National, Regional and Local Context

Issues Raised	Council Response

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<p>The plan contradicts legislation and policy (inc. PPW and Future Wales) and does not conform with its own preferred strategy.</p>	<p>No specific examples of where the plan contradicts legislation, policy or where the plan does not conform to its own strategy have been identified by the respondent. Appendix 1 of the Pre-Deposit Plan sets out how the policies in the plan address the wider legislative and policy framework, identifying where the plan addresses the respective elements of them.</p> <p>The Strategy for the plan has been developed through the engagement process that assisted in developing the plan to date. The plan is the vehicle for setting out the strategy, so it is difficult to understand how the respondent considers that the plan does not accord with it. The plan has been developed on a procedural basis that considered the following steps in turn, building on from the previous stage in each case:</p> <ul style="list-style-type: none"> <li>• Level of growth for the plan period;</li> <li>• The Vision Aims and Objectives that will deliver that growth;</li> <li>• The overall Strategy approach for the plan; and</li> <li>• The policy Framework and Strategic Site Allocations</li> </ul> <p>Given this, it is clear that far from being contradictory, the plan is wholly targeted at delivering the identified level of growth for the plan period and consequently the plan seeks to deliver the same outcomes.</p>
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### Greenfield Development

Issues Raised	Council Response
<p>Objection to greenfield development. Previously developed land should be used before undeveloped land.</p> <p>Greenfield development contrary to PPW and GI strategy.</p>	<p>The general assertion that greenfield development is bad and brownfield development is good is incorrect. Brownfield land contain some of the most important and diverse habitats that we have in the County Borough. Conversely a significant amount of the greenfield land surrounding our settlements is comprised of improved agricultural grassland which has little if any importance for nature conservation or biodiversity, with the exception of field boundaries, where they are comprised of stone walls or hedgerows (and these can be maintained and enhanced as part of</p>

	<p>development proposals). To assume a general presumption against development on greenfield land would, therefore, lead to the loss of some of the most important and diverse brownfield habitats and preserve greenfield sites with much less importance for biodiversity. This position does not deliver sustainable development.</p> <p>While PPW is clear that previously developed land should be utilised in preference to greenfield (paragraph 3.55), it also states that not all such sites will be suitable for redevelopment due to contamination, its unsustainable location or the potential for constraints to be imposed upon existing, adjacent activities. The adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, and those sites that remain fall into this category. Sites proposed for inclusion within the 2RLDP will be assessed in terms of deliverability and viability, which are important considerations in the site selection process and are factored into candidate site assessments.</p> <p>Green infrastructure is an important consideration for the 2RLDP as set out in the Preferred Strategy's vision and aims. However, the Green Infrastructure Strategy for the county borough and the emerging Green Infrastructure Assessment for the plan are tools that are used to identify the most suitable and appropriate sites for development, whilst maintaining and enhancing the important areas of land. Consequently, far from being contrary to the Green Infrastructure Strategy, sites are allocated in accordance with it. Furthermore, PPW Paragraphs 6.2.4 and 6.2.5 set out how green infrastructure can be integrated into developments, improving well-being and helping deliver placemaking outcomes.</p>
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### Stages/Timing of Development

Issues Raised	Council Response
Need to ensure that developers will build the entire project (danger: less profitable parts won't be finished).	The Council will not be able to adopt the 2RLDP until it has undergone a public examination process overseen by an independent planning inspector, who will determine whether the plan is 'sound' as assessed against a series of tests. As part of this, the Council, and site proponents, will need to demonstrate both deliverability and viability of particular sites (and each element thereof, where applicable, including

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<p>Doubt over whether the site could be finished in the suggested timescale.</p> <p>Developer's plans do not show full extent of development.</p> <p>Concerns over the delivery of 40% housing in one location.</p> <p>Delivery will be complicated with multiple land ownership, consortium and existing constraints.</p> <p>No plan for construction, phasing and the costs involved.</p> <p>Concerns regarding funding for the development and/or the new road.</p> <p>Detailed viability evidence and scrutiny is required.</p> <p>What guarantees can be given regarding financial viability?</p> <p>Bias towards larger properties as opposed to smaller affordable units.</p>	<p>phasing), information relating to which was sought during the call for candidate sites. Beyond that, the details of any proposal will be subject to the planning application process and will be assessed at that stage.</p> <p>It is accepted that, due to the scale of the site, development will continue beyond the lifetime of the 2RLDP, and this is factored into the housing land requirement.</p> <p>The site promoters have submitted viability evidence that confirms that the site is viable and deliverable in its entirety, and the Council will put in place measures to ensure that all elements of the strategic site are built and will include trigger points that will determine when specific elements of the development will need to be delivered.</p> <p>There is not a requirement for 40% affordable housing on this site. The affordable housing targets for different spatial areas within the county borough has yet to be determined having regard to site viability and housing need as identified by the Local Housing Market Assessment.</p>
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### Design and visual impact

Issues Raised	Council Response
<p>Road-dominated layout.</p> <p>Effect on landscape (may damage tourism industry, too).</p> <p>Development fails at placemaking.</p>	<p>The Council does not accept that the development is a road-dominated development. The access road will provide access to the site that, due to its size, would be required to have 2 access points. The opportunity has been taken to utilise the Crown and Duffryn Roundabouts as access points and this affords the opportunity to provide congestion relief to the A472. The site has been identified as it offers the opportunity</p>

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	<p>to meet a significant proportion of the requirements of the 2RLDP (and subsequent plans) whilst generating a level of development capital that can address a wide range of issues across a wider area than just the site and the settlement of Maesycwmmmer alone, e.g. modal shift, health and education provision.</p> <p>As part of the evidence prepared to support the Strategic Site the promoters have prepared landscape and ecological reports that address the impacts the development has in these terms. The initial Masterplan layout has been informed by this information and there are significant opportunities for biodiversity and landscape enhancement as part of the proposals.</p> <p>The Council share the concerns over how the Initial Masterplan addresses Placemaking both on site and across the wider settlement pattern. However, the Initial Masterplan is the first iteration of the Masterplan, and this will develop over time and take account of the concerns raised in respect of Placemaking, among other considerations.</p>
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### Effect on character of village and other settlements

Issues Raised	Council Response
<p>Effect on 'sense of place' and character of village.</p> <p>Coalescence of settlements leading to loss of identity, detrimental to sense of community.</p>	<p>The village of Maesycwmmmer would become larger, but the proposal would not change any of the older buildings or streets. It is accepted that development of this scale would have an impact, on the overall character of the settlement as a whole. However, matters such as Placemaking and residential amenity are key considerations, and will be addressed through the development plan process and also through the development management process, in consultation with the community.</p> <p>The Strategic Site is an extension of the existing settlement to the south-east. As such the Strategic Site would not join any other settlements and so coalescence is not an issue here.</p>

### Amenity

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<b>Issues Raised</b>	<b>Council Response</b>
<p>Effect on 'adjoining bungalows'.</p> <p>Detrimental impact in terms of noise.</p> <p>Development will bring about an increase in crime, e.g. speeding and theft.</p> <p>Who will buy the proposed houses? New houses are often limited in terms of scale.</p> <p>Detrimental impact on air quality.</p>	<p>The impacts of the proposed development will be considered and assessed as part of the plan preparation process and also as part of the development management process when formal proposals are brought forward. Any adverse impacts will be addressed during the plan preparation process and where necessary appropriate mitigation will be identified to minimise them.</p> <p>The site forms part of the overall land allocations to meet the identified level of growth for the plan period and therefore the mix of type and tenure of housing on this site will meet those requirements.</p>

## Housing

<b>Issues Raised</b>	<b>Council Response</b>
<p>Instead of building new houses, the Council should spend more money on the established village of Maesycwmmmer.</p> <p>Empty housing stock should be used instead.</p> <p>New housing should be near Metro proposals.</p> <p>No evidence to suggest that lots of new houses are needed.</p> <p>The proposal, with its through road and poor links to the established village, would create a divided community.</p> <p>Proposed density of housing is 'unrealistic and unfair'.</p>	<p>The evidence base in respect of the 2RLDP's proposed level of growth, and the associated housing land requirement, is set out in PS1 - Population and Housing Growth Options. A series of growth scenarios were considered which used the 2018-based Welsh Government population and household projections as their starting point. Scenario J was ultimately chosen as the preferred scenario as it aims for a sufficient increase in the working age population, over and above that set out in the projections, to support the Cardiff Capital Region (CCR) jobs target for South East Wales and represents a mid-point between the adopted LDP's annual housing requirement and the past build rates figure. Relying on the projections alone would amount to planning for economic decline, which would not be sustainable. It should be remembered that the 2RLDP covers the period between 2020 and 2035, therefore a medium to long term economic forecast has been taken, going beyond the current economic climate, through the Employment Land Review (ELR). This is set out in the PS14 - Employment Background Evidence Paper and taken account of in the consideration of growth scenarios. Sites with extant planning permission are taken into account when arriving at the housing land requirement, though neither this</p>

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<p>Where will the new residents come from?</p> <p>Level of housing will not support the local economy and is unsustainable given current economic climate.</p> <p>Insufficient affordable housing will be provided.</p> <p>Sufficient planning permissions for housing already exist.</p> <p>Development appears to be for profit rather than to address housing need.</p> <p>Detrimental impact (of road) on value of existing houses.</p> <p>Will the planning permission on Gellideg Heights (18/0289/NCC) remain valid as a result of the CCR grant application? The latter is for an increased number of dwellings which will impact the green wedge.</p>	<p>proposal, nor the 2RLDP, affects the validity of those schemes for which permission has been granted. While the Council is active in terms of bringing empty dwellings back into beneficial use, these represent a tiny proportion of the number required to satisfy the future housing land requirement over the plan period.</p> <p>The Strategic Site is justified on the basis of it being a sustainable location within the context of the hybrid approach chosen for the Preferred Strategy due to its location in the A472 corridor, within walking distance of Hengoed Railway Station and cycling distance to the Principal Town Centres of Blackwood and Ystrad Mynach and the Local Centre of Newbridge and also its cycle distance from Ystrad Mynach and Newbridge railway stations and Blackwood Bus Interchange. It is also within cycling distance of the County Borough's primary employment centre at Oakdale/Penyfan, and in walking/cycling distance of Duffryn industrial estate, making the site well suited to maximise local employment opportunities. As such the site is considered to be a sustainably located site for consideration for inclusion in the plan.</p> <p>While the Preferred Strategy establishes the affordable housing target for the County Borough, detailed viability work is being undertaken which will refine the approach taken and will influence the Deposit Plan. The impact of the proposed development in terms of matters such as accessibility, connectivity and residential amenity has been taken into account during the candidate site assessment process, with input from relevant Council departments as well as external stakeholders. Detailed proposals that come forward at planning application stage will be required to ensure that all applicable planning considerations are satisfied, including the provision of affordable housing, and will be assessed in relation to relevant national and local policies. While the value of existing dwellings is not a material planning consideration, issues that directly affect it (including those listed above) are, and these will be evaluated accordingly.</p>
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## Traffic and Transport

Issues Raised	Council Response
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<p>Proposed road inadequate.</p> <p>People will continue to prefer driving to active travel and public transport.</p> <p>Proposed road won't help existing residents, or at least not until it's finished.</p> <p>Houses won't be within walking distance of main towns or railway stations.</p> <p>Proposal will create parking problems.</p> <p>Concern over funding arrangements for road and the timescale for building it.</p> <p>Junctions near, and routes to, the site would be inadequate.</p> <p>Proposed road goes against policies on climate change and decarbonisation.</p> <p>Proposal would need to use land owned by somebody other than the applicants/site promoters.</p> <p>Effect of the proposal on rail services and infrastructure.</p> <p>Effect of the proposal on road safety, traffic levels and pollution.</p> <p>Doubts over new transport initiatives.</p> <p>Proposal won't 'address' out-commuting or improve routes to employment centres.</p>	<p>The site promoters' transport vision statement identifies that the developed site will be a '15-minute neighbourhood' i.e. one where residents can meet many of their everyday needs without having to drive to other places. The site promoters want future residents to have a choice about their transport methods and are proposing a range of measures that can bring about significant modal shift.</p> <p>The candidate site submission sought to illustrate how the land <i>could</i> be used and how development <i>might</i> affect the surrounding area. The Council continues to examine evidence in respect of transport infrastructure, although detailed elements of any proposal are subject to the planning application process, including engagement with external stakeholders such as Transport for Wales (TfW). This will address such issues as the capacity of local roads, traffic forecasts and implications, points of access, routes between the site and the established village of Maesycwmmmer, road design, active-travel routes, bus services, parking arrangements, air quality, land ownership, funding arrangements for the proposed road, and a timetable for building the road.</p> <p>The issue of climate change and its implications are a key consideration for the 2RLDP, and mitigating for climate change effects as well as reducing emissions contributing toward climate change are fundamental elements in the development strategy. The Preferred Strategy contains Policy PS6: Climate Change which aims to ensure all development proposals make a positive contribution towards addressing the causes of, and adapting to the impacts of, climate change. The Transport Vision Statement prepared by the promoters of the site identify a range of measures to promote sustainable transport and reduce car borne travel through sustainability hubs within the proposed development. These measures will deliver significant modal shift and will provide more realistic modal shift increases than purely locating a site next to a town centre or transport node. Furthermore the site's location on the A472 is ideally located to maximise the benefits from the Mid-Valleys Rapid Transit Route that is currently being investigated by TfW as part of the Metro network.</p>
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**Climate, Energy and Environment**

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<b>Issues Raised</b>	<b>Council Response</b>
<p>Contravenes energy policy, won't lower carbon emissions.</p> <p>Concern over global warming.</p> <p>Air quality and pollution needs to be considered and addressed.</p> <p>CCBC declared a climate emergency in 2019, this development is excessive and does not conform with this declaration.</p>	<p>The Council notes concern regarding the impacts of climate change and global warming. The 2RLDP outlines that all development proposals will need to make a positive contribution towards adapting to and mitigating against the impacts of climate change. Policy PS6 of the Pre-Deposit Plan outlines the specific criteria that all development proposals must adhere to in regard to this. In addition, the Strategic Site will provide opportunities for low carbon homes with EV charging infrastructure and encourage residents to pursue measures such as ownership of low carbon and electric vehicles.</p> <p>The Strategic Site, due to its sustainable location, can deliver significant modal shift through a range of measures that are set out in the Transport Vision Statement prepared by the site promoters. Consequently the site will reduce the level of emissions and assist in delivering the Council's and Welsh Government's targets on decarbonisation and modal shift.</p> <p>The issue of climate change and its implications are a key consideration for the 2RLDP, and mitigating for climate change effects as well as reducing emissions contributing toward climate change are fundamental elements in the development strategy. The Preferred Strategy contains Policy PS6: Climate Change which aims to ensure all development proposals make a positive contribution towards addressing the causes of, and adapting to the impacts of, climate change.</p>

**Biodiversity, Ecosystem Resilience & Habitats**

<b>Issues Raised</b>	<b>Council Response</b>
<p>CCBC Biodiversity target.</p> <p>Detrimental environmental damage and decline of biodiversity.</p>	<p>Concerns have been raised about the Council's biodiversity target and the decline of areas of ecological importance. The Strategic Site is not within proximity of national designations such as Sites of Special Scientific Interest (SSSIs) so there are no concerns regarding the potential impact of development with regards to this. However, there are three Sites of Importance for Nature Conservation (SINCs)</p>

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<p>Biodiversity and habitats should be safeguarded.</p> <p>Loss of carbon sink close to two SSSIs.</p> <p>Loss of site's ecological value.</p> <p>Detrimental impact on biodiversity.</p> <p>Loss of site's ecological value and protected species such as red kites.</p> <p>Has biodiversity assessment been carried out?</p>	<p>within, and adjoining, the site which are non-statutory designations put in place by the adopted LDP 2010. The sites promoters have prepared a significant amount of evidence that has supported the development of the initial Masterplan for the site, and this includes ecological assessments. It should be noted that only half of the overall site is being proposed for development and this provides the opportunity for significant biodiversity enhancement.</p> <p>In addition to this the Council is undertaking a Green Infrastructure Assessment (GIA) to identify new opportunities for green infrastructure and areas for enhancement within the County Borough, including sites for biodiversity, ecosystem resilience and habitat connectivity. The GIA will be published during the Deposit Plan consultation stage and will include more detail surrounding the specific protection of key areas, opportunities for GI enhancement and corridors for ecosystem connectivity.</p>
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## Landscape

Issues Raised	Council Response
<p>Impact on/loss of green spaces/landscape.</p> <p>Distinctive landscapes and sense of place are important.</p> <p>Loss of 'greenbelt' land, areas identified as greenbelt (sic) in the Wales National Plan should not be included as a matter of course.</p>	<p>The Strategic Site has been identified to help meet the requirement for housing for the County Borough for the plan period. It should be noted, however, that only around half of the total area of the site is proposed for development. The remaining land will be the subject of enhancement both in terms of biodiversity and landscape quality. Currently the land can only be accessed and used on the existing footpaths. Much of the undeveloped land associated with the development will be open to the public to use and access, improving the recreational and well-being value of the land. As a result the proposed development will provide enhanced open spaces for public use, rather than result in the loss of landscape and green space.</p> <p>The sites promoters have prepared a significant amount of evidence that has supported the development of the initial Masterplan for the site, and this includes ecological, landscape and placemaking assessments. Whilst the Council has concerns over the general placemaking elements of the Masterplan, this is only the first version of the Masterplan, and the Council will work with the promoters to</p>

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	<p>address these concerns and ensure the proposed development meets all of the strategic placemaking principles.</p> <p>While large parts of the site constitute greenfield development under the definition set out in Planning Policy Wales, none is identified as green belt land, which is a specific planning designation designed for the long-term protection of land. Future Wales sets out the need for the Strategic Development Plan to identify a green belt in the Cardiff Capital Region, however the potential area for this green belt does not relate to, nor come close to, this site. Consequently this site does not result in the loss of green belt land.</p>
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**Trees, Woodlands, and Hedgerows**

<b>Issues Raised</b>	<b>Council Response</b>
<p>Concerns over scale large deforestation, the loss of trees and hedgerows for development.</p> <p>Ancient woodland should be protected.</p> <p>WG tree planting schemes should be prioritised over large residential developments.</p>	<p>The purpose of the development plan is to consider the principle of the land use for sites that allocate specific land uses. It is not the role of the development to address proposal specific details that will be the subject of consideration through the development management process when detailed proposals are submitted in a planning application. Consequently the development plan will consider the broad issue of trees woodland and hedgerows but will not consider how each individual tree or hedgerow will be affected. However, the impacts that the proposed development can have on these landscape assets has been considered as part of the Candidate Site Assessment process as set out in the PS8 – Candidate Site Methodology.</p> <p>The sites promoters have prepared a significant amount of evidence that has supported the development of the initial Masterplan for the site, and this includes ecological, and landscape assessments. These assessments have been used to inform the initial Masterplan that seeks to protect and enhance the trees, woodland and hedgerows across the site. Whilst the initial Masterplan will be refined throughout the plan preparation process the protection of these assets will continue to be a key requirement. As the Masterplan is refined opportunities for the enhancement of these landscape features will also be identified.</p>

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	<p>Consequently the proposed development seeks to reinforce the trees, woodlands and hedgerows across the site to provide significant biodiversity and landscape enhancements rather than look to remove these assets as part of any development. With regards to tree planting programs, the Council's Green Spaces Group, in collaboration with Natural Resource Wales (NRW), is actively identifying areas of land within the County Borough to plant new trees to tackle the climate crisis and provide new ecosystems. Planting programs are already underway at Ynys Hywel and the Darren Valley with many more locations planned over the plan period, although no land currently has been identified on the Strategic Site. However, as the plan preparation process progresses opportunities for tree planting opportunities across the site will be considered and proposed to the Council's Green Spaces Group.</p>
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### Public footpaths/rights of way

Issues Raised	Council Response
<p>Proposal will 'infringe on public footpaths and statutory rights of way'.</p>	<p>While this issue has been assessed as part of the candidate sites process, detailed proposals that come forward at planning application stage will be required to ensure that all applicable planning considerations are satisfied, including the protection of public footpaths and rights of way, and will be assessed in relation to relevant national and local policies.</p>

### Flooding & Drainage

Issues Raised	Council Response
<p>Strain on already struggling drainage system. Village already floods.</p>	<p>Flood risk is an issue associated with coastal areas, rivers and surface water from developed and undeveloped land alike. Due to the location of the Strategic Site surface water flooding is the key flood risk issue associated with the site. Surface water flooding occurs from undeveloped land and development on such land can</p>

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<p>Not clear where additional surface water would go.</p> <p>Not enough detail about proposed sewers.</p> <p>Effect of sewage on Rhydney River.</p> <p>No plan for 'improvement and integration of sewerage and drainage systems.</p> <p>Llanbradach will be flooded.</p> <p>Seeks assurances that the development will not cause flooding due to historic mining works in the vicinity.</p>	<p>address the flooding issues and remedy the situation. All new development is required to have an appropriate drainage system that is based upon Sustainable Drainage System (SuDS) principles and prioritise natural methods rather than artificial ones. Any drainage system for a development needs to get SuDS Approval Body (SAB) approval for their system before development can commence. The SAB will seek to ensure that the surface water run-off from a site will be less than it was as an undeveloped site and will ensure that the development will reduce or eliminate any surface water flood risk to adjoining land.</p> <p>The Council work closely with Welsh Water in respect of the development plan and Welsh Water input into the process to ensure that the allocations coming forward in the plan do not give rise to issues with the existing sewerage network. Where issues are raised developers will be required to deliver upgrades to the system in order to allow development to proceed. It is acknowledged that the area has a history of mining works, and this issue has been the subject of evidence reports prepared by the promoters of the site and have been considered in the design and layout of the initial Masterplan. The issues of the historic mining activity and its implications will be considered fully as the site progresses and any issues arising from the proposed development will be the subject of mitigation measures to minimise any impacts.</p>
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### Health Infrastructure

Issues Raised	Council Response
<p>Local doctors and dentist surgeries will be overwhelmed.</p> <p>Two closest surgeries are closed to new patients.</p> <p>Officers stated this is a Health Authority problem.</p>	<p>The Council has been liaising with the Aneurin Bevan University Health Board over health provision across the County Borough and the impacts that proposed development will have. As part of these discussion the promoters of the Strategic Site have agreed to accommodate improved health provision on site that could address not only the health requirements arising from the proposed development, but to address a number of issue that also exist outside the site in the wider area. Consequently, far from having adverse impacts on health provision, the development of the site will result in a wider benefit in health provision.</p>

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<p>Need provision in place before problem occurs.</p> <p>Emphasis on health and wellbeing, large developments impact on mental health.</p> <p>Oakfield surgery requires expansion and is not adequate for existing requirements.</p> <p>No mandatory requirement imposed in relation to provision of health services.</p> <p>Contrary to well-being goals.</p> <p>Effect of additional traffic on local air quality.</p> <p>Detrimental impact on health and well-being; green spaces should be preserved for this reason.</p>	<p>The Strategic Site will maintain, enhance and improve significant areas of open access landscape and open space, increasing public access to useable open space which will improve the health and well-being of the residents of Maesycwmmmer and the wider area in accordance with the well-being act.</p> <p>The access road for the site will provide a highway improvement for the Maesycwmmmer stretch of the A472 which is currently the subject of significant congestion. Reducing traffic levels on the A472 by diverting some of the traffic onto the access road will remove the congestion and will improve air quality as traffic will no longer be idling and stationary causing a potential build-up of air pollution.</p>
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## Education

Issues Raised	Council Response
<p>Current school system is operating at maximum capacity.</p> <p>Immense pressure from new residents for primary and secondary.</p> <p>Provision must be put in place as development is being built, not after.</p> <p>Village already has too few youth facilities.</p> <p>Clarity required on delivery of school.</p>	<p>The Strategic Site will require the provision of a new primary school to address the number of pupils that will be generated through the development. The Council has been in discussion with the promoters of the Strategic Site, and they have agreed to release land for the provision of 3-18 age group school if a need for such a facility is required. This facility could address issues that the Council has in education provision across a wider area. Consequently, far from adversely impacting upon education provision in the area, it provides an opportunity to address issues in education provision across a wider area than just the site.</p> <p>There are currently no plans to close the existing primary school in Maesycwmmmer with any new facility intended to complement, rather than replace, it.</p>

## Sports, Recreation and Tourism

Issues Raised	Council Response
<p>Fields are used by all residents of Maesycwmmmer for recreation.</p> <p>Council has recognised how important green spaces are for physical and mental health.</p> <p>Village needs sports fields (six-acre standard).</p> <p>Loss of jobs at golf course.</p> <p>Effect on local leisure facilities, detrimental impact on tourism.</p> <p>Development will have significant impact on the routes of walkers and cyclists.</p>	<p>Firstly it should be noted that the Strategic Site is largely comprised of agricultural land over which there is no general public access. The only legal way to access this land is via the public footpath network and access is limited to the extent of the footpath only. These fields are not accessible for general recreational purposes.</p> <p>It should also be noted that only around half of the total area of the Strategic Site is proposed to accommodate development. The remaining land will be the subject of enhancement both in terms of biodiversity and landscape quality. Currently the land can only be accessed and used on the existing footpaths, but much of the undeveloped land associated with the development will be open to the public to use and access, providing enhanced accessibility and recreational opportunities for residents which will benefit residents' well-being and mental health. As a result the proposed development will provide enhanced open and recreational spaces for public use, rather than result in the loss of recreational land and opportunities.</p> <p>The hotel and leisure facilities at Bryn Meadows are privately owned and operated and are not under the control of the Council. Whilst the existing golf course will be part of the proposed development, the hotel and conference facilities will be retained and enhanced through the development. There are also opportunities that the owners of the Bryn Meadows could utilise to redevelop the golf course on adjoining land, but that is an issue outside of the Strategic Site. As a result employment opportunities will be generated through the development of the commercial enterprises at the golf club.</p>

## Heritage and Historical Assets

Issues Raised	Council Response



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Loss of historical features e.g., tramway tracks, quarry entrances	The site promoters have prepared a significant amount of evidence that has supported the development of the initial Masterplan for the site, and this includes heritage and archaeological assessments. Whilst the initial Masterplan will be refined throughout the plan preparation process the protection of the important heritage assets will continue to be a key requirement. As the Masterplan is refined opportunities for the enhancement of these heritage assets will also be identified.
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### Waste

Issues Raised	Council Response
<p>Concern over disposal of waste.</p> <p>Lack of clarity of how waste services will be impacted by another development.</p> <p>Concerns over additional sewage.</p>	<p>The impact of the proposed development in terms of matters such as environmental impact, amenity, infrastructure provision and highways has been taken into account during the candidate site assessment process, with input from relevant Council departments as well as external stakeholders such as Natural Resources Wales and Dwr Cymru Welsh Water. Waste generated from the uses on the development will be collected and disposed of in accordance with the Council's waste operations.</p> <p>Dwr Cymru Welsh Water has been liaising with the Council in respect of the sites being considered for inclusion in the plan and the Council will continue to work with them to ensure that all identified sites can be appropriately serviced. To date no significant issues have arisen in respect of the Strategic Site.</p>

### Minerals

Issues Raised	Council Response
<p>Concern over sandstone safeguarding area.</p>	<p>Planning Policy Wales (PPW) requires that development plans provide for the safeguarding and working of minerals. However, safeguarding does not indicate an acceptance of mineral working; merely that the location and quality of the mineral is</p>

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	known and that the environmental constraints associated with extraction have been considered.
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**Mining history**

<b>Issues Raised</b>	<b>Council Response</b>
<p>Concern over previous mine workings.                      Site contains infilled and unstable land.                      Concern over ground conditions.                      Concern over steepness of site.</p>	<p>The site promoters have prepared a significant amount of evidence that has supported the development of the initial Masterplan for the site, and this includes ground investigation surveys and reports. The Masterplan has taken account of the findings of this evidence and the issues of the mining legacy and filled, and unstable land have been addressed. Whilst the initial Masterplan will be refined throughout the plan preparation process the issues associated with ground conditions will continue to be addressed appropriately.</p>

**Other**

<b>Issues Raised</b>	<b>Council Response</b>
<p>Consideration of additional community facilities e.g. religious institutions, veterinary surgeries.                      Increased maintenance costs for CCBC with respect to community infrastructure.                      Increased demand on utilities.                      Loss of good agricultural land.                      The Council has failed to engage with residents on alterations to existing road.</p>	<p>The purpose of the Local Development Plan is to consider the principles of development rather than the specifics of any particular layout or design. Consequently the plan will consider the general landuses to be contained within the Strategic Site rather than any specific use. The site does identify community and sustainability hubs across the site where ancillary facilities and infrastructure will be located. These hubs can accommodate a range of local services and facilities and the promoters of the site are open to consider what uses should be incorporated within them. The Council are acutely aware that the proposed development will need community facilities, and these will be provided as part of the overall scheme. Furthermore, other uses can be accommodated within the site as appropriate and to reflect this, a recent response to the Pre-Deposit consultation has sought provision</p>

## Initial Consultation Report

<p>No discussion with those most impacted by the proposed development.</p> <p>Little to hold developers accountable. Inadequate consultation period – needed to be extended, not enough people notified.</p>	<p>for a new church facility as part of the development and this has been forwarded to the promoters for consideration.</p> <p>The issue of maintenance for the facilities provided on the site will be a matter for the respective Council service areas and provision through the development will be made for the expense of this maintenance. Where facilities are operated by other bodies it will be for these bodies to consider how they are maintained.</p> <p>None of the land constitutes Grades 1, 2 or 3a agricultural land and therefore the proposal does not adversely affect the best and most versatile agricultural land which is in accordance with national guidance.</p> <p>The Strategic Site is being appropriately promoted through the Local Development Plan and as a result the proposals for the site and any infrastructure associated with it will be the subject of statutory consultation and engagement as part of the plan preparation process. Consequently it is inaccurate to state that there is no discussion regarding the proposal when comments have been received in respect of the site as part of the Pre-Deposit Consultation.</p> <p>It should also be noted that in terms of the Strategic Site the Council has invited Maesycwmmmer Community Council to take part in the engagement process set up to inform the preparation of the plan, although the Community Council did not take up this opportunity to input their views into the process. The Council did meet with the Community Council prior to the Pre-Deposit Consultation and discussed the Strategic Site proposals with them. It should also be noted that Council and the site promoters attended a public exhibition in Maesycwmmmer and Officers and the promoters were present to answer any questions and to discuss the issues surrounding the Strategic Site. It is incorrect to state that the Council has not afforded people the opportunity to discuss and comment on the emerging plan.</p> <p>Consultation on the Pre-Deposit Plan is subject to the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 (as amended). Regulation 16 sets the requirement that comments on the Pre-Deposit Consultation must be received within 6 weeks of the commencement date of the consultation. Consequently the consultation period for the Pre-Deposit Plan can only be 6 weeks, otherwise comments received after the 6-week period cannot be considered.</p>
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## Initial Consultation Report

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	<p>The Council sought to notify as many people as possible and the measures adopted included a leaflet drop to all households in the County Borough, notification sent through all of the Council's social media channels, notification of everyone on the consultation database and to local business forums to name but few. The measures undertaken by the Council far exceed the measures required by the planning regulations.</p>
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## ANNEX 5A: COMMENTS RELATING TO CANDIDATE SITES

In total 1,641 representations were made in respect of Candidate Sites during the statutory consultation period.

Table 1 identifies the number of representations made in support and the objections raised to sites within each Masterplan area.

**Table 1 - Masterplan Areas**

<b>Masterplan Area</b>	<b>Support</b>	<b>Object</b>	<b>Total Representations</b>
Caerphilly Basin (CB)	26	453	479
Greater Blackwood (GB)	17	640	657
Heads of the Valleys (HOV)	5	12	17
Lower Ebbw and Sirhowy Valleys (RNC)	14	232	246
Ystrad Mynach (YM)	15	227	242
<b>Total</b>	<b>77</b>	<b>1,564</b>	<b>1,641</b>

The following tables detail all sites, by area:

- Table 2 - Caerphilly Basin (CB)
- Table 3 - Greater Blackwood (GB)
- Table 4 - Heads of the Valleys (HOV)
- Table 5 - Lower Ebbw and Sirhowy Valleys (RNC)
- Table 6 - Ystrad Mynach (YM)

**Table 2 – Caerphilly Basin (CB)**

<b>Caerphilly Basin (CB)</b>	<b>Support</b>	<b>Object</b>	<b>Representations</b>
CB001 - Land south of Cefn llan, Abertridwr	0	1	1
CB002 - Ness Tar, Caerphilly	2	35	37
CB003 - Land at The Oaks, Rudry	0	2	2
CB004 - Land at Energlyn, Caerphilly	0	0	0
CB005 - Catnic, Caerphilly	0	0	0
CB006 - Gwaun Gledyr, Caerphilly	0	24	24
CB007 - Land at Starbuck Street, Rudry	1	1	2
CB008 - Land at Ty Nula, Rudry	0	0	0
CB009 - Land at Lower Brynhyfryd Terrace, Senghenydd	0	0	0
CB010 - Welsh Egg Farm, Caerphilly	1	6	7
CB011 - Land at Colliery Road, Llanbradach	0	0	0
CB012 - Windsor Colliery, Abertridwr	0	4	4
CB013 - Land at Pandy Mawr Road. Bedwas	0	1	1
CB014 - Ty Isaf Farmlands (Site 1), Caerphilly	0	0	0
CB015 - Ty Isaf Farmlands (Site 2), Caerphilly	0	0	0
CB016 - Former Tinworks, Waterloo	2	0	2
CB017 - Land at Pandy Road (phase 2), Bedwas	1	26	27
CB018 - Land at Watford Road, Caerphilly	0	43	43
CB019 - Land west of Mill Close, Caerphilly	0	0	0
CB020 - Land at Watford Park, Caerphilly	0	28	28
CB021 - Land west of Colliery Road, Llanbradach	0	1	1
CB022 - Gwem y Domen, Caerphilly	1	6	7
CB023 - Land south of Rudry Road, Caerphilly	2	51	53
CB024 - Land at Porset Row, Caerphilly	0	0	0
CB025 - Land at Nantycalch Farm (Option A), Caerphilly	2	83	85
CB026 - Land at Garth View, Bedwas	0	0	0
CB027 - Land near Van Mansion, Caerphilly	2	59	61
CB028 - Land East of Railway Terrace, Caerphilly (Former Ness Tar and Pesci Sites)	5	23	28
CB029 - Land East of School Street, Llanbradach	0	0	0
CB030 - Land north of James Street, Trethomas	0	6	6
CB031 - Land at Bedwas Colliery, Bedwas	2	4	6
CB032 - Land at Nantycalch Farm (Option B), Caerphilly	2	25	27
CB033 - Land at Nantycalch Farm (Option C), Caerphilly	2	24	26
CB034 - Gelli Wastad Farm, Machen	0	0	0
CB035 - Land to the south of Sunnybank Terrace, Machen	1	0	1
<b>Total</b>	<b>26</b>	<b>453</b>	<b>479</b>

**Table 3 - Greater Blackwood (GB)**

<b>Greater Blackwood (GB)</b>	<b>Support</b>	<b>Object</b>	<b>Representations</b>
GB001 - Land and garage buildings north of Main Road, Maesycwmmmer	0	1	1
GB002 - Land adjoining Old Junction House, Commercial Street, Pontllanfraith	0	1	1
GB003 - Trinant Sports & Social Club, Trinant	0	1	1
GB004 - Land west of Seda, Hawtin Park	0	0	0
GB005 - Land at The Gwrhay, Argoed	0	1	1
GB006 - Land at Oakdale Terrace, Oakdale	1	7	8
GB008 - Land at Ty Mawr, Croespenmaen	1	19	20
GB009 - Land at Gellideg, Maesycwmmmer	1	1	2
GB010 - Land at Nant Gau, Oakdale	1	16	17
GB011 - Land at Gellideg Heights, Maesycwmmmer	0	2	2
GB012 - Land at Heol y Cefn, Blackwood	1	23	24
GB013 - Land east of Oakdale Golf Club,	1	5	6
GB014 - Land off Summerfield Hall Lane, Gellihaf	0	1	1
GB015 - Trelyn Scrapyrd, Blackwood	0	0	0
GB016 - Land at Parkway, Penyfan, Croespenmaen	0	0	0
GB017 - Pen Rhiw Fields, North of Central Avenue, Oakdale	0	26	26
GB018 - Land at St David's Avenue, Blackwood	0	0	0
GB019 - 1 Pentref-Y-Groes Farm, Croespenmaen	0	0	0
GB020 - 1 Pentref-Y-Groes Farm, Croespenmaen	0	0	0
GB021 - Former Gellideg Industrial Estate, Maesycwmmmer	1	9	10
GB022 - Land at Parc Gwernau, Maesycwmmmer	8	460	468
GB023 - Pantysgawen Farm, Croespenmaen	0	22	22
GB024 - Tir Filkins Colliery	0	1	1
GB025 - Land South of Heol Y Dderwen, Blackwood	2	0	2
GB026 - Land East of Heol Y Dderwen, Blackwood	0	0	0
GB027 - Brierly House, Aberbeeg, Abertillery	0	0	0
GB028 - Former Pontllanfraith School	0	6	6
GB029 - Former Oakdale Comprehensive	0	2	2
GB030 - Land at Cwmgelli Farm, Blackwood	0	7	7
GB031 - Land off Woodfield Park Lane	0	5	5
GB032 - Land at Penrhiw Bengi Lane, Oakdale	0	21	21
GB033 - Land at Pencoed Fawr Farm, off Beaumaris Way, Blackwood	0	3	3
<b>Total</b>	<b>17</b>	<b>640</b>	<b>657</b>

**Table 4 - Heads of the Valleys (HOV)**

<b>Heads of the Valleys (HOV)</b>	<b>Support</b>	<b>Object</b>	<b>Representations</b>
HOV001 - Land adjacent to McLaren Cottages, Abertysswg	0	0	0
HOV002 - Land at Markham Colliery, Markham	1	0	1
HOV003 - Land south of Springfield Terrace, Hollybush	0	0	0
HOV004 - Land at Coed-y-Brain House, Aberbargoed	0	1	1
HOV005 - Land at 60 Abernant Road, Markham	0	0	0
HOV006 - Land at Coed-y-Brain House (site 2), Aberbargoed	0	5	5
HOV007 - Land at Coed-y-Brain House (site 3), Aberbargoed	0	1	1
HOV008 - Land north of Camo Street, Rhymney	0	0	0
HOV009 - Land at former Station House, Rhymney	0	0	0
HOV010 - Land at Abernant Road, Markham	0	0	0
HOV011 - Land to the east of the A4048, Hollybush	0	0	0
HOV012 - Land at Heol Pen Rhiw'r Eglwys, Bedwellty	0	0	0
HOV013 - Land at Gelliwen Farm, Markham	0	1	1
HOV014 - Land south of Hillside Park, Bargoed	0	0	0
HOV015 - Land at Park Estate, Bargoed	0	0	0
HOV016 - Land opposite Heolddu Grove, Bargoed	0	0	0
HOV017 - Land East of Brynhyfryd, Pontlottyn	0	0	0
HOV018 - Land south of Greensway, Abertysswg	0	0	0
HOV019 - Aberbargoed Plateau, Aberbargoed	3	4	7
HOV020 - Former Aldi Site, Rhymney	1	0	1
HOV021 - Land off Manmoel Road, Manmoel (South of Village Hall)	0	0	0
<b>Total</b>	<b>5</b>	<b>12</b>	<b>17</b>



**Table 5 - Lower Ebbw and Sirhowy Valleys (RNC)**

<b>Lower Ebbw and Sirhowy Valleys (RNC)</b>	<b>Support</b>	<b>Object</b>	<b>Representations</b>
RNC001 - Land adjoining 66 Llanfach Road, Abercam	0	1	1
RNC002 - Land at Gelli-Unig Place, Pontywaun	1	3	4
RNC003 - Land between Twyn Gwyn Road & Mount Pleasant, Ynysddu	0	2	2
RNC004 - Land at Sofrydd Road, Hafodyrynys	0	0	0
RNC005 - Former Cwmcarn High School	0	1	1
RNC006 - Former allotments, Wattsville	1	3	4
RNC007 - Land at Inn on the Park, Fields Park, Newbridge	0	2	2
RNC008 - Land west of Albertina Road, Newbridge	5	49	54
RNC009 - Land north of Ramping Road, Cwmcarn	0	1	1
RNC010 - Land north of Tribute Avenue, Cwmcarn	0	3	3
RNC011 - Penyfan Farm, Risca Road, Risca	0	57	58
RNC012 - Penyfan Farm (site 2), Risca Road	0	8	8
RNC013 - Glanhowy Road, Wyllie	0	3	3
RNC014 - Land south of the Glade, Wyllie	1	2	3
RNC015 - Land at cycle path, Wyllie	0	2	2
RNC016 - Land west of Pen y Cwarel Road, Wyllie	0	2	2
RNC017 - Land at Snowdon Close, Ty Melyn, Risca	1	5	6
RNC018 - Land North of Holly Road, Penrhiw, Risca	0	13	13
RNC019 - Land south of Holly Road (West), Risca	0	6	6
RNC020 - Land south of Holly Road (East), Risca	1	3	4
RNC021 - Land at Tynewydd Park, Risca	1	5	6
RNC022 - Land at Ty Darren, Risca	0	2	2
RNC023 - Council Service Site, Brookland Road, Risca	0	34	34
RNC024 - Land next to Risca Leisure Centre	1	10	12
RNC025 - Land at Elm Drive, Pontymister	0	8	8
RNC026 - Twyn Gwyn Farm, Newbridge	0	1	1
RNC027 - Land rear of Holly Road flats, Risca	1	4	5
RNC028 - Land at Pen-y-Cwarel Road, Wyllie	1	2	3
<b>Total</b>	<b>14</b>	<b>232</b>	<b>246</b>

**Table 6 - Ystrad Mynach (YM)**

Site Name	Support	Object	Representations
YM001 - Land north of Cae Ysbugar, Cefn Hengoed	0	1	1
YM002 - Land North of Brooklands, Nelson	0	1	1
YM003 - Land West of Bwl Road, Nelson	0	0	0
YM004 - Land adjacent to 18 Haulwen Road, Penpedairheol	0	0	0
YM005 - DCWW Depot, Pentwyn Road, Nelson	0	0	0
YM006 - Land at Caerphilly Road, Tredomen	0	1	1
YM007 - Land south of Gelligaer Court, Penpedairheol	0	3	3
YM008 - Land at Mountain Way, Nelson	0	0	0
YM009 - Land off Twyn Road, Ystrad Mynach	1	2	3
YM010 - Land at Rhos Farm, Penpedairheol	1	6	7
YM011 - Land north of A472, Tredomen	0	11	11
YM012 - Land south of A472, Tredomen	0	12	12
YM013 - Land at Glyngaer Road, Penpedairheol	1	17	18
YM014 - Gelligaer Uchaf Farm, Gelligaer	1	1	2
YM015 - Land to north and east of Cefn Hengoed, Cefn Hengoed	2	26	28
YM016 - Gelligaer Uchaf Farm, Gelligaer (Site 2)	0	0	0
YM017 - Land at Cefn Llwynau Farm, Penallta Road, Penybryn	3	30	33
YM018 - Land at Forest Avenue, Cefn Hengoed	1	2	3
YM019 - Land at Hengoed Avenue, Cefn Hengoed	0	1	1
YM020 - Land at Myrtle Grove, Hengoed	0	51	51
YM021 - Land East of Maes-y-Onen, Maes Mafon Estate, Nelson	0	0	0
YM022 - Land south of Gwaun Fro, Penpedairheol	1	6	7
YM023 - Land South of Kestrel View, Hengoed	0	23	23
YM024 - Land West of West Road, Penallta	0	1	1
YM025 - Land east of Penybryn Tce, Penybryn	0	1	1
YM026 - Land at Ty Du Farm, Nelson	0	3	3
YM027 - Land adjacent to Tir y Berth Farm, Hengoed Road, Penpedairheol, Hengoed	0	15	15
YM028 - Land at Tir Jack Farm, Penpedairheol	0	13	13
YM029 - Partmart Automotive Recycling	4	0	4
<b>Total</b>	<b>15</b>	<b>227</b>	<b>242</b>

**ANNEX 5B: CANDIDATE SITES RECEIVING NO REPRESENTATIONS**

In total 41 sites received no representations. These are listed as follows:

CB004 - Land at Energlyn, Caerphilly
CB005 - Catnic, Caerphilly
CB008 - Land at Ty Nula, Rudry
CB009 - Land at Lower Brynhyfryd Terrace, Senghenydd
CB011 - Land at Colliery Road, Llanbradach
CB014 - Ty Isaf Farmlands (Site 1), Caerphilly
CB015 - Ty Isaf Farmlands (Site 2), Caerphilly
CB019 - Land west of Mill Close, Caerphilly
CB024 - Land at Porset Row, Caerphilly
CB026 - Land at Garth View, Bedwas
CB029 - Land East of School Street, Llanbradach
CB034 - Gelli Wastad Farm, Machen
GB004 - Land west of Seda, Hawtin Park
GB015 - Trelyn Scrapyard, Blackwood
GB016 - Land at Parkway, Penyfan, Croespenmaen
GB018 - Land at St David's Avenue, Blackwood
GB019 - 1 Pentref-Y-Groes Farm, Croespenmaen
GB020 - 1 Pentref-Y-Groes Farm, Croespenmaen
GB026 - Land East of Heol Y Dderwen, Blackwood, Caerphilly
GB027 - Brierly House, Aberbeeg, Abertillery
HOV001 - Land adjacent to McLaren Cottages, Abertysswg
HOV003 - Land south of Springfield Terrace, Hollybush
HOV005 - Land at 60 Abernant Road, Markham
HOV008 - Land north of Carno Street, Rhymney
HOV009 - Land at former Station House, Rhymney
HOV010 - Land at Abernant Road, Markham
HOV011 - Land to the east of the A4048, Hollybush
HOV012 - Land at Heol Pen Rhiw'r Eglwys, Bedwellty
HOV014 - Land south of Hillside Park, Bargoed
HOV015 - Land at Park Estate, Bargoed
HOV016 - Land opposite Heolddu Grove, Bargoed
HOV017 - Land East of Brynhyfryd, Pontlottyn
HOV018 - Land south of Greensway, Abertysswg
HOV021 - Land off Manmoel Road, Manmoel (South of Village Hall)
RNC004 - Land at Sofrydd Road, Hafodyrynys
YM003 - Land West of Bwl Road, Nelson
YM004 - Land adjacent to 18 Haulwen Road, Pedpedairheol
YM005 - DCWW Depot, Pentwyn Road, Nelson
YM008 - Land at Mountain Way, Nelson
YM016 - Gelligaer Uchaf Farm, Gelligaer (Site 2)
YM021 - Land East of Maes-y-Onen, Maes Mafon Estate, Nelson

## ANNEX 6: 2nd CALL FOR CANDIDATE SITES

In total 22 sites were submitted as part of the 2<sup>nd</sup> Call for Candidate Sites. These are listed as follows:

CB101	Land at former Water Treatment Works, Rudry
CB102	Land south of Sunnybank Tce, Machen
CB103	Land at Gwaun Gledyr
CB104	Colliery Road, Bedwas (site 1)
CB105	Colliery Road, Bedwas (site 2)
GB101	Lower Lodge, Woodfield Park, Penmaen
GB102	Land east of Heol y Dderwen, Blackwood
GB103	Ty Llwyd Quarries, Pontllanfraith
HOV105	Argoed Fawr farm
HOV106	Ty Rhosyn, Bedwellty Road, New Tredegar
HOV107	Land at Heol Pen Rhiw'r Eglwys, Bedwellty
HOV108	Land south east of Sunny View, Pontlottyn
HOV109	Heolddu Comprehensive School
HOV110	Land at Coed y Brain, Aberbargoed
RNC101	Land at Commercial Street, Ynysddu
RNC102	Land adj. to 1 Pontgam Tce, Ynysddu
RNC103	Land at Glanhwy Road, Ynysddu
RNC104	Land at Homeleigh, Newbridge
RNC105	Land south of Commercial Street, Risca
RNC106	Land south of Chapel Farm Ind Est, Cwmcarn
RNC107	Land at Upper Mount Pleasant Farm, Risca
YM101	Ty Du, Nelson

## **APPENDIX 1: LIST OF CONSULTATION BODIES**

### **Specific Consultation Bodies as defined in LDP Regulation 2 (including UK Government Departments):**

- Welsh Government
- Natural Resources Wales
- Network Rail Infrastructure Ltd
- Office of Secretary of State for Wales
- Telecommunication Operators – EE, Vodafone and O2, BT, Virgin Media, Mobile Operators Association
- Aneurin Bevan Health Board
- Gas and Electricity Licensees – National Grid, Wales & West Utilities, Western Power Distribution, British Gas, SSE
- Sewerage and Water Undertakers – Dŵr Cymru Welsh Water
- Department for Transport (including Secretary of State for functions previously exercised by the Strategic Rail Authority)
- UK Government Departments – Department of Business, Energy and Industrial Strategy
- Home Office
- Ministry of Defence
- CADW

### *Neighbouring and other Local Authorities within the Cardiff Capital Region:*

- Blaenau Gwent County Borough Council
- Brecon Beacons National Park
- Bridgend County Borough Council
- Cardiff Council
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- Newport City Council
- Rhondda Cynon Taf County Borough Council
- Torfaen County Borough Council
- Vale of Glamorgan Council

### *Local Community and Town Councils:*

- Aber Valley Community Council
- Argoed Community Council
- Bargoed Town Council
- Bedwas, Trethomas & Machen Community Council
- Blackwood Town Council
- Caerphilly Town Council
- Darran Valley Community Council
- Draethen, Waterloo & Rudry Community Council
- Gelligaer Community Council
- Llanbradach & Pwllpant Community Council
- Maescwmmer Community Council

- Nelson Community Council
- New Tredegar Community Council
- Penyrheol, Trecenydd & Energlyn Community Council
- Rhymney Community Council
- Risca East Community Council
- Risca Town Council
- Van Community Council

*Neighbouring Community and Town Councils:*

- Abertillery & Llanhilleth Town Council
- Bedlinog Community Council
- Cwmbran Community Council
- Graig Community Council
- Henllys Community Council
- Lisvane Community Council
- Michaelstone-Y-Fedw Community Council
- Pontypridd Town Council
- Rogerstone Community Council
- St Mellons Community Council
- Taffs Well Community Council
- Tongwynlais Community Council
- Tredegar Town Council

**General Consultation Bodies**

***Voluntary Bodies whose activities benefit any part of the authority's area:***

- GAVO
- Caerphilly Parent Network
- Caerphilly 50+ Forum

***Equalities Organisations:***

*Bodies which represent the interests of different Age groups in the authority's area:*

- Age Cymru
- Caerphilly County Borough Youth Forum

*Bodies which represent the interests of disabled persons in the authority's area:*

- Action on Hearing Loss Cymru
- Caerphilly People First
- Changing Faces
- British Deaf Association (BDA)
- Caerphilly County Borough Access Group
- Deafblind Cymru
- Disability Can Do
- Disability Wales
- Disabled Persons Transport Advisory Committee
- Gwent Hearing Impairment Service
- Gwent Visual Impairment Service

- Learning Disability Wales
- Mencap Cymru
- Mind Cymru
- Royal National Institute of Blind People
- The Stroke Association
- Wales Council for Deaf People
- Wales Council for the Blind

*Bodies representing the interests of different racial, ethnic or national groups in the authority's area:*

- The Equality and Human Rights Commission
- Travelling Ahead
- Association of Gypsies and Travellers In Wales
- Cardiff Gypsy and Traveller Project
- The Showmen's Guild of Great Britain
- Race Equality First

*Bodies which represent the interests in different religious groups in the authority's area:*

- Church in Wales
- Siloh Christian Centre
- Catholic Church in Wales
- Kingdom Hall Jehovah's Witnesses
- Muslim Council for Wales
- South Wales Baptist Association
- United Reform Church
- Salvation Army
- Cardiff Buddhist Centre
- UK Islamic Mission
- Gwent Association of the Baptist Union of Wales
- East Glamorgan Association of the Baptist Union of Wales

*Bodies which represent the interests of lesbian, gay, bisexual and transgender groups in the authority's area:*

- Stonewall Cymru
- Bi Cymru Wales
- Guys and Gals
- Rainbow Group
- Umbrella Gwent

*Bodies which represent the interests of persons carrying out business in the authority's area:*

- Caerphilly Business Club
- Careers Wales
- Business Wales (South Wales Regional Centre)
- Federation of Small Businesses in Wales
- Welsh ICE

*Bodies which represent the interests of Welsh culture in the authority's area:*

- Glamorgan Gwent Archaeological Trust Ltd
- Royal Commission on Ancient and Historic Monuments

- Welsh Historic Gardens Trust
- Ancient Monument Society

*Bodies which represent the interests of Welsh language in the authority's area:*

- Menter Iaith Caerffili
- RhAG – Rhieni dros Addysg Gymraeg
- Canolfan Cymraeg i Oedolion @ Coleg Gwent
- Mudiad Ysgolion Meithrin
- Cymraeg for Kids
- Yr Urdd
- Caerphilly Family Information Service
- Caerphilly Welsh Language Forum

### **Other Consultees**

The Council will consult with the following other consultees, where appropriate, in accordance with the Delivery Agreement. This list is not exhaustive and may be added to as appropriate:

- Arts Council of Wales
- British Horse Society
- Bus Users Cymru
- Campaign for the Protection of Rural Wales
- Capital Region Tourism
- Chartered Institute of Housing (Cymru)
- Chartered Management Institute (Cymru)
- Children's Commissioner for Wales
- Civic Trust Cymru
- Coed Cymru
- Coleg Gwent
- Coleg y Cymoedd
- Community Transport Association
- Confederation of Passenger Transport
- Crisis
- District Valuer Services
- Fields in Trust
- Freight Transport Association
- Future Generations Commissioner for Wales
- Institute of Civil Engineers
- National Library of Wales
- One Voice Wales
- Open Spaces Society
- Planning Aid Wales
- Planning Inspectorate
- Rail Freight Group
- Road Haulage Association Ltd
- Royal Institute of Chartered Surveyors
- Royal Town Planning Institute (Wales)
- RSPB Cymru
- Ruperra Conservation Preservation Trust



- Shelter Cymru
- South Wales Trunk Road Agency
- Sport Wales
- Stagecoach
- Sustrans
- The Energy Saving Trust
- The Georgian Group
- The National Trust
- The Older People's Commissioner for Wales
- The Woodland Trust
- Transport for Wales
- Wales Council for Voluntary Action
- Welsh Language Commissioner
- Wildlife Trust
- WWF Cymru

**Housing Associations**

**Local House Builders**

**Planning Consultants and Local Planning Agents**

**Political including Local Assembly Members and Members of Parliament**

## APPENDIX 2: REPRESENTOR AND REPRESENTATION NUMBERS

Appendix 2 lists Representor and Representation Numbers for all representations received:

1. Representations on the Pre-Deposit Plan (Preferred Strategy) And Supporting Information
2. Representations on the ISA
3. Representations on the Strategic Site (Parc Gwernau, Maesycwmmmer)
4. Representations relating to Candidate Sites
5. Withdrawn Representations
6. Representations that were not duly made

### 1. Representations on the Pre-Deposit Plan (Preferred Strategy) And Supporting Information

**Support** (Representor Number-Representation Number)

55-1822	819-1966	1169-1157	1610-1980	1951-1447	2018-1656	2103-1879
55-1823	819-1967	1227-1384	1610-1987	1951-1448	2018-1657	2103-1882
233-1970	839-1400	1261-307	1660-1965	1951-1450	2022-1978	2103-1887
233-1971	902-805	1291-2004	1660-927	1951-1451	2040-1734	
233-1972	939-1123	1295-359	1660-928	1951-1453	2044-1940	
233-1973	966-358	1295-414	1660-930	1951-1961	2044-1943	
233-1974	1059-105	1307-401	1660-931	1961-2006	2052-1804	
233-1975	1102-1702	1307-402	1667-933	1961-2009	2055-1793	
670-1043	1150-227	1317-1219	1793-1207	1961-2011	2057-1797	
670-1045	1150-228	1459-626	1793-1239	1974-1543	2066-1806	
812-1104	1150-231	1467-1356	1793-1703	1994-1586	2069-1809	
812-1107	1150-233	1472-654	1806-1221	2007-1945	2069-1811	
812-1114	1150-235	1472-666	1830-1250	2007-1948	2079-1833	
812-1115	1150-574	1472-667	1925-1362	2013-1642	2085-1843	
812-1118	1150-575	148-1828	1935-1402	2015-1651	2103-1876	
819-1633	1150-577	1489-674	1951-1446	2018-1652	2103-1877	

Initial Consultation Report

**Objection (Representor Number-Representation Number)**

55-1821	821-357	1169-1154	1489-1546	1924-1353	1996-1590	2040-1951
55-1824	840-1584	1169-1155	1489-1836	1924-1354	1997-1935	2040-1952
139-1525	847-1632	1169-1156	1560-760	1924-1355	1997-1936	2040-1953
139-1526	857-1937	1291-1958	1610-1571	1925-1373	2000-1598	2040-1954
148-1827	857-1938	1291-1990	1610-1979	1930-1382	2005-1612	2044-1939
233-1636	881-607	1291-1991	1610-1981	1931-1387	2006-1613	2044-1941
233-1637	883-395	1291-2003	1610-1982	1932-1389	2007-1944	2044-1942
233-1964	885-1381	1291-345	1610-1983	1932-1390	2007-1946	2048-1769
423-1794	891-1629	1291-346	1610-1984	1932-1391	2007-1947	2049-1770
670-1038	902-808	1291-347	1610-1985	1932-1392	2007-1949	2051-1781
670-1039	902-809	1291-348	1610-1986	1932-1393	2010-1635	2061-1801
670-1041	919-1026	1291-902	1610-1988	1932-1394	2013-1641	2069-1808
670-1044	919-1027	1295-420	1660-1962	1934-1401	2013-1643	2069-1810
800-765	919-1028	1306-400	1660-1963	1936-1403	2013-1644	2069-1960
800-768	919-1029	1310-407	1660-924	1939-2000	2014-1646	2070-1812
812-1106	919-1030	1310-422	1660-925	1951-1449	2014-1647	2070-1813
812-1109	966-421	1317-1388	1660-926	1951-1452	2014-1648	2071-1814
812-1110	1010-50	1317-423	1660-929	1961-1489	2014-1649	2071-1815
812-1111	1010-51	1318-424	1664-916	1961-2005	2014-1959	2076-1826
812-1112	1015-55	1319-425	1667-935	1961-2007	2018-1653	2078-1830
812-1113	1026-65	1347-470	1667-936	1961-2008	2018-1654	2079-1831
812-1117	1026-66	1368-504	1704-1021	1961-2010	2018-1655	2079-1832
812-1119	1051-96	1463-647	1704-1023	1964-1495	2022-1659	2079-1834
812-1719	1105-1701	1467-1357	1708-1035	1973-1542	2022-1660	2090-1862
812-2002	1150-207	1472-643	1753-1135	1989-1572	2022-1661	2103-1873
819-1615	1150-225	1472-645	1793-1236	1990-1573	2022-1662	2103-1874
819-1627	1150-226	1472-650	1793-1237	1994-1585	2022-1976	2103-1875
819-1968	1150-229	1472-652	1806-1220	1994-1587	2022-1977	2103-1878
819-1969	1150-568	1472-653	1843-1263	1994-1955	2023-1667	2103-1880
821-351	1150-572	1472-661	1924-1350	1994-1956	2027-2001	2103-1881
821-352	1150-573	1472-664	1924-1351	1996-1588	2028-1696	2103-1883
821-353	1169-1152	1472-665	1924-1352	1996-1589	2040-1950	2137-1931

**2. Representations on the ISA**

**Support (Representor Number-Representation Number)**

1051-95						
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**Objection (Representor Number-Representation Number)**

2103-1884	2103-1884	2103-1884				
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**3. Representations on the Strategic Site (Parc Gwernau, Maesycwmmer)**

Initial Consultation Report

**Support** (Representor Number-Representation Number)

809-206	1088-1921	1295-413	1472-660
966-416	1132-216	1361-485	2109-1889

**Objection** (Representor Number-Representation Number)

286-1410	1209-224	1401-522	1501-693	1720-1055	1827-1247	1916-1342
577-406	1215-1047	1403-525	1502-694	1722-1054	1829-1248	1917-1343
800-767	1215-249	1404-535	1503-695	1724-1057	1833-1253	1918-1344
844-290	1227-1383	1408-545	1504-696	1729-1062	1835-1254	1919-1345
857-1583	1236-888	1409-546	1505-697	1730-1066	1837-1255	1921-1347
857-932	1253-292	1410-547	1506-698	1731-1068	1838-1259	1922-1348
881-605	1255-298	1412-550	1507-699	1732-1073	1838-1892	1923-1349
902-1180	1256-299	1413-551	1508-702	1733-1074	1839-1260	1925-1372
902-1317	1256-300	1427-566	1509-701	1735-1076	1840-1261	1926-1361
902-1318	1258-304	1430-571	1510-703	1736-1077	1841-1262	1928-1375
902-1899	1259-305	1432-587	1512-705	1737-1078	1844-1264	1939-1411
902-336	1260-306	1434-593	1513-706	1738-1080	1845-1265	1948-1441
919-1031	1265-312	1435-595	1515-708	1742-1083	1849-1268	1959-1481
949-1580	1296-368	1436-599	1519-713	1743-1084	1850-1269	1972-1539
962-3	1298-378	1437-600	1536-737	1744-1086	1856-1276	1976-1547
969-1444	1302-394	1438-601	1537-738	1744-1173	1857-1277	1978-1552
969-344	1303-396	1439-602	1538-739	1758-1147	1858-1279	1979-1553
974-399	1304-397	1440-603	1540-741	1765-1174	1859-1280	1980-1554
983-43	1305-398	1441-604	1542-743	1767-1176	1860-1281	1983-1559
986-31	1309-405	1442-606	1544-745	1768-1177	1861-1282	1984-1560
988-35	1322-428	1443-608	1545-746	1769-1178	1862-1283	1985-1561
988-486	1323-431	1444-609	1546-747	1770-1179	1863-1284	1985-1568
995-41	1324-429	1445-610	1547-748	1771-1181	1865-1286	1986-1562
998-293	1325-430	1446-611	1548-749	1771-1197	1867-1287	1991-1579
998-42	1326-447	1447-612	1549-750	1772-1183	1869-1289	1992-1581
998-487	1326-620	1448-613	1552-751	1773-1184	1871-1291	1993-1582
1002-44	1327-432	1450-614	1553-752	1775-1186	1872-1292	1997-1591
1013-513	1328-433	1451-616	1554-754	1777-1188	1873-1293	1999-1597
1013-53	1331-437	1454-619	1556-755	1778-1189	1874-1294	2007-1616
1020-57	1340-449	1455-621	1557-756	1779-1190	1875-1295	2007-1625
1021-182	1340-450	1456-623	1558-757	1781-1192	1877-1296	2008-1630
1021-302	1343-452	1457-624	1559-758	1783-1194	1878-1298	2009-1631
1021-303	1346-455	1458-625	1560-759	1785-1198	1879-1299	2027-1692
1021-59	1348-457	1460-627	1571-1234	1786-1199	1879-1309	2029-1700
1022-1704	1350-462	1462-630	1571-770	1787-1200	1880-1300	2034-1720
1022-61	1351-464	1463-632	1581-1544	1788-1201	1881-1301	2036-1725
1024-62	1352-465	1464-631	1595-807	1789-1202	1882-1302	2039-1733
1028-419	1353-466	1465-634	1603-819	1790-1203	1883-1303	2040-1743
1028-598	1354-467	1466-636	1604-820	1791-1204	1884-1304	2041-1746
1031-74	1355-469	1467-637	1609-835	1792-1205	1885-1305	2044-1758
1034-493	1357-472	1468-640	1641-883	1794-1206	1886-1306	2049-1778
1035-635	1359-474	1469-638	1651-893	1795-1208	1887-1307	2051-1789
1035-76	1367-481	1470-641	1654-898	1796-1209	1888-1308	2053-1790
1040-83	1369-482	1471-642	1655-899	1797-1210	1891-1312	2059-1796
1041-85	1370-483	1472-649	1655-900	1798-1211	1892-1313	2061-1997

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1043-87	1371-484	1472-651	1660-923	1799-1212	1893-1314	2063-1800
1053-100	1376-494	1472-657	1661-913	1799-1319	1894-1315	2064-1803
1069-139	1377-495	1472-658	1662-914	1800-1213	1895-1316	2065-1805
1072-123	1378-496	1472-920	1663-915	1802-1215	1896-1320	2088-1856
1089-1497	1379-497	1472-990	1665-919	1805-1218	1897-1321	2091-1867
1098-1496	1380-498	1475-644	1681-981	1808-1222	1898-1322	2108-1888
1099-1408	1381-499	1476-646	1682-969	1809-1224	1899-1323	2110-1890
1106-946	1382-500	1476-648	1685-988	1811-1226	1902-1326	2111-1891
1113-144	1383-501	1477-656	1689-995	1813-1228	1903-1327	2112-1893
1119-1161	1385-503	1484-668	1691-999	1814-1229	1904-1330	2113-1894
1119-149	1386-506	1485-669	1693-1000	1815-1230	1905-1331	2114-1895
1123-280	1387-507	1486-671	1701-1017	1816-1231	1906-1332	2115-1896
1140-156	1388-508	1487-672	1706-1032	1816-1232	1907-1333	2116-1897
1140-677	1390-509	1488-673	1706-1168	1817-1233	1908-1334	2117-1898
1150-570	1391-512	1490-675	1707-1033	1818-1235	1909-1335	2120-1902
1152-1607	139-1530	1492-679	1711-1040	1819-1238	1910-1336	2125-1911
1160-1069	1392-511	1494-683	1711-1042	1820-1240	1911-1337	2126-1912
1160-1071	1393-514	1497-688	1712-1046	1821-1241	1912-1338	2127-1913
1160-175	1394-515	1498-690	1715-1048	1822-1242	1913-1339	2128-1914
1191-1130	1395-516	1499-692	1717-1051	1825-1245	1914-1340	
1198-218	1397-518	1500-691	1717-1915	1826-1246	1915-1341	

## 4. Representations relating to Candidate Sites

### Caerphilly Basin (CB)

#### **Support** (Representor Number-Representation Number)

55-1825	1610-1569	1727-1089	1727-1099	1727-1711	1889-1310	2022-1663
819-1614	1610-1570	1727-1091	1727-1708	1727-1712	1889-1487	2024-1677
856-109	1657-1604	1727-1093	1727-1709	1750-1116	1925-1370	
1115-147	1718-1065	1727-1097	1727-1710	1750-1125	1925-1371	

#### **Objection** (Representor Number-Representation Number)

148-1673	1191-1127	1404-527	1669-937	1890-1311	1963-1493	2025-1672
148-1674	1221-253	1404-528	1669-938	1925-1363	1963-1494	2027-1685
148-1675	1221-254	1404-529	1678-965	1925-1364	1965-1498	2027-1686
148-1676	1221-255	1404-530	1678-966	1925-1365	1965-1499	2027-1687
795-242	1224-257	1414-1842	1678-968	1925-1366	1965-1500	2027-1688
801-796	1224-258	1432-578	1681-970	1925-1367	1967-1502	2027-1689
801-797	1224-259	1432-580	1681-971	1925-1368	1968-1515	2030-1705
801-798	1226-261	1432-581	1681-972	1925-1369	1968-1516	2030-1706
801-799	1226-262	1432-582	1681-973	1929-1378	1968-1517	2030-1707
810-773	1234-269	1432-583	1681-974	1929-1379	1968-1518	2033-1713
810-774	1234-270	1433-594	1681-975	1931-1385	1968-1519	2033-1714
816-659	1237-276	1433-596	1681-976	1931-1386	1969-1522	2033-1715
816-662	1238-277	1433-597	1681-977	1937-1404	1970-1523	2033-1716
838-354	1267-316	1461-2012	1688-991	1937-1405	1970-1524	2033-1717
838-355	1272-1022	1461-2013	1688-992	1937-1406	1972-1531	2035-1721
838-356	1272-1024	1461-628	1688-993	1937-1407	1972-1532	2035-1722
839-1397	1272-1034	1461-629	1688-994	1939-1412	1972-1533	2035-1723
839-1398	1272-1095	1478-655	1703-1019	1939-1413	1972-1534	2035-1724
839-1399	1272-1096	1478-663	1703-1020	1939-1414	1972-1535	2037-1726
845-952	1279-556	1483-676	1718-1058	1939-1415	1977-1549	2037-1727
845-954	1286-333	1483-680	1718-1075	1939-1416	1977-1550	2037-1728
845-956	1286-334	1496-689	1726-1067	1940-1421	1981-1555	2037-1729
845-957	1286-335	1516-709	1726-1070	1940-1422	1981-1556	2038-1730
845-959	1287-1256	1518-711	1728-1060	1940-1423	1982-1557	2038-1731
845-960	1287-1257	1518-712	1728-1061	1940-1424	1982-1558	2040-1735
845-961	1287-1258	1539-740	1728-1063	1942-1426	1990-1574	2040-1736
845-962	1288-337	1567-764	1734-1079	1943-1427	1990-1575	2040-1737
845-963	1288-338	1573-775	1741-1085	1943-1428	1990-1576	2040-1738
856-110	1291-579	1573-777	1741-1087	1943-1429	1990-1577	2040-1739
856-111	1291-589	1575-780	1741-1088	1943-1430	1990-1578	2040-1745
856-113	1291-590	1575-781	1750-1120	1944-1433	1998-1592	2043-1748
856-13	1291-591	1576-778	1750-1121	1944-1434	1998-1593	2043-1749
856-14	1291-592	1576-779	1750-1122	1944-1435	1998-1594	2044-1750
909-940	1291-633	1577-782	1751-1124	1944-1436	1998-1595	2044-1751
909-945	1291-639	1577-783	1753-1129	1946-1437	1998-1596	2044-1752
945-1329	1291-897	1587-792	1756-1133	1946-1438	2000-1599	2044-1753
956-25	1291-901	1597-811	1756-1134	1946-1439	2000-1600	2044-1754

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973-18	1291-903	1597-812	1756-1136	1947-1440	2000-1601	2044-1762
984-30	1291-904	1597-813	1756-1137	1953-1455	2000-1602	2047-1763
1010-92	1296-360	1605-1196	1756-1138	1953-1456	2000-1603	2047-1764
1010-93	1296-361	1605-821	1756-1139	1953-1457	2002-1605	2048-1765
1056-103	1296-362	1607-824	1756-1140	1953-1458	2002-1606	2048-1766
1068-119	1296-363	1608-825	1758-1141	1954-1459	2003-1608	2048-1767
1068-120	1296-364	1609-1010	1758-1142	1954-1460	2003-1609	2048-1768
1069-127	1298-370	1609-827	1758-1143	1954-1461	2003-1610	2050-1779
1069-128	1298-371	1609-828	1758-1144	1954-1462	2007-1617	2050-1780
1069-129	1298-372	1609-829	1758-1145	1955-1463	2007-1618	2058-1795
1069-130	1298-373	1609-830	1760-1153	1955-1464	2007-1619	2061-1799
1069-131	1298-374	1609-831	1760-1160	1955-1465	2007-1620	2061-1802
1069-132	1308-1409	1611-838	1761-1158	1955-1466	2007-1621	2061-1992
1069-133	1308-403	1611-839	1761-1159	1958-1469	2012-1639	2061-1993
1069-134	1308-404	1612-842	1762-1164	1958-1470	2012-1640	2061-1999
1069-135	1308-823	1612-843	1762-1165	1958-1483	2023-1664	2067-1807
1069-136	1316-801	1614-845	1762-1166	1958-1484	2023-1665	2087-1849
1069-137	1316-802	1614-846	1762-1871	1958-1485	2023-1666	2087-1850
1069-140	1320-426	1616-850	1764-1169	1959-1471	2023-1679	2088-1851
1069-141	1320-427	1617-848	1764-1170	1959-1472	2023-1680	2088-1852
1069-142	1332-438	1617-849	1764-1171	1959-1473	2023-1681	2088-1853
1106-1101	1332-439	1624-860	1764-1172	1959-1474	2023-1682	2088-1854
1106-1103	1334-441	1624-862	1766-1175	1959-1475	2023-1683	2088-1855
1106-1105	1374-491	1627-1025	1766-1565	1959-1476	2024-1668	2092-1868
1119-221	1374-492	1629-864	1766-1566	1959-1477	2024-1684	2092-1869
1147-162	1396-520	1629-865	1766-1567	1962-1490	2025-1669	2092-1870
1164-177	1396-521	1636-875	1803-1216	1963-1491	2025-1670	
1174-185	1404-526	1636-878	1828-1249	1963-1492	2025-1671	

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**Greater Blackwood (GB) - Excluding Strategic Site**

**Support** (Representor Number-Representation Number)

809-206	966-416	1295-413	1672-1008	2074-1820	2080-1835	
819-1628	1088-1921	1361-485	2018-1658	2075-1818	2109-1889	
819-1634	1132-216	1472-660	2074-1817	2075-1819		

**Objection** (Representor Number-Representation Number)

748-10	1069-138	1218-251	1298-376	1643-884	1900-1324	2040-1741
748-67	1113-143	1218-252	1298-377	1649-890	1901-1325	2040-1742
748-9	1113-145	1225-260	1298-379	1651-892	1939-1417	2040-1744
800-766	1113-146	1230-265	1404-532	1651-894	1939-1418	2044-1755
828-950	1122-317	1231-266	1404-533	1658-906	1939-1419	2044-1756
857-40	1122-318	1246-284	1404-534	1658-910	1939-1420	2044-1757
962-1	1122-319	1248-286	1404-536	1659-907	1956-1467	2044-1759
962-2	1122-320	1249-287	1432-584	1659-909	1959-1478	2061-1994
962-4	1122-321	1249-288	1432-585	1675-1108	1959-1479	2061-1995
962-5	1123-281	1251-289	1432-586	1675-1718	1959-1480	2061-1996
967-15	1161-176	1274-322	1432-588	1677-951	1959-1482	2061-1998
988-32	1183-187	1274-323	1550-753	1681-978	1968-1520	2077-1829
988-33	1193-195	1275-324	1569-769	1681-979	1968-1521	2085-1844
988-34	1193-196	1276-325	1570-771	1681-980	1972-1536	2085-1845
989-36	1193-197	1277-326	1572-772	1681-982	1972-1537	2085-1846
1007-125	1193-198	1280-328	1579-785	1697-1007	1972-1538	2085-1847
1007-126	1209-313	1281-329	1588-793	1745-1090	1972-1540	2088-1857
1007-47	1209-314	1282-331	1593-804	1745-1092	2007-1622	2088-1858
1007-48	1209-315	1292-1098	1609-832	1755-1128	2007-1623	2088-1859
1011-54	1211-232	1293-349	1609-833	1758-1148	2007-1624	2088-1860
1021-58	1211-234	1293-622	1609-834	1758-1149	2007-1626	2090-1863
1022-60	1211-236	1296-365	1609-836	1758-1150	2027-1690	2090-1864
1041-84	1211-237	1296-366	1620-852	1758-1151	2027-1691	2090-1865
1048-89	1211-238	1296-367	1632-868	1799-1328	2027-1693	2090-1866
1050-91	1211-239	1296-369	1639-880	1804-1217	2027-1694	
1054-99	1218-250	1298-375	1642-882	1855-1275	2040-1740	

**Heads of the Valleys (HOV)**

**Support** (Representor Number-Representation Number)

821-382	821-383	918-841	1670-942	1671-944
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**Objection** (Representor Number-Representation Number)

918-837	1613-844	1638-873	1638-876	1670-941	1957-1468	
1339-448	1625-861	2638-874	1638-879	1671-943	2089-1861	



Initial Consultation Report

**Lower Ebbw & Sirhowy Valleys (RNC)**

**Support** (Representor Number-Representation Number)

1121-151	1136-153	1138-155	1338-859	1541-742	1672-1132	2072-1816
1135-152	1137-154	1139-158	1384-505	1672-1009	1676-1548	2082-1837

**Objection** (Representor Number-Representation Number)

821-384	1066-117	1263-308	1411-549	1525-721	1618-869	1699-1014
828-272	1067-118	1266-311	1415-552	1525-722	1619-851	1699-1015
828-273	1070-122	1278-327	1415-553	1525-723	1619-853	1714-1053
828-274	1071-121	1283-330	1417-555	1525-724	1619-854	1716-1050
828-275	1073-124	1284-332	1418-559	1525-725	1619-855	1721-1059
828-947	1120-150	1299-381	1419-1380	1525-726	1621-856	1721-1064
912-70	1132-208	1300-391	1419-557	1526-727	1623-858	1739-1081
970-16	1132-209	1329-435	1420-558	1526-728	1628-1432	1747-1100
971-17	1132-210	1333-440	1421-560	1527-729	1628-867	1748-1102
975-20	1132-211	1335-442	1423-561	1528-730	1630-877	1757-1131
977-21	1132-212	1336-443	1423-562	1530-733	1631-1376	1774-1185
978-22	1132-213	1336-444	1424-563	1530-917	1631-866	1776-1187
978-27	1132-215	1336-445	1425-564	1530-918	1634-870	1780-1191
979-23	1143-160	1336-446	1426-565	1531-734	1635-872	1782-1193
979-24	1144-159	1341-451	1431-576	1532-735	1637-871	1784-1195
980-26	1165-178	1349-458	1449-1163	1533-736	1640-881	1784-1551
981-28	1165-179	1349-459	1449-615	1563-762	1644-885	1801-1214
982-29	1165-180	1349-460	1482-670	1564-763	1645-887	1807-1223
992-37	1165-181	1349-461	1491-678	1578-784	1652-895	1810-1225
994-39	1186-350	1349-463	1491-681	1582-788	1652-896	1823-1243
1004-45	1200-220	1384-502	1491-686	1583-1377	1664-1910	1824-1244
1005-46	1214-243	1389-510	1491-687	1583-1645	1668-1486	1834-1252
1008-49	1214-244	1400-523	1493-682	1583-789	1668-934	1847-1267
1014-52	1214-245	1405-1445	1493-684	1585-790	1674-1002	1927-1374
1014-94	1214-246	1405-537	1493-685	1586-791	1681-983	1941-1425
1036-77	1214-247	1406-538	1520-714	1591-800	1681-987	1950-1443
1042-86	1214-248	1406-539	1521-715	1592-803	1684-984	1952-1454
1045-88	1239-1162	1406-540	1522-1182	1594-806	1684-985	2026-1678
1049-90	1239-278	1406-541	1522-1541	1596-810	1690-996	
1058-104	1239-554	1406-542	1522-716	1598-814	1696-1005	
1061-112	1239-997	1406-543	1523-717	1601-815	1696-1006	
1062-114	1240-279	1407-544	1525-718	1602-816	1699-1011	
1063-115	1242-731	1411-1695	1525-719	1602-817	1699-1012	
1064-116	1262-310	1411-548	1525-720	1615-847	1699-1013	

Initial Consultation Report

**Ystrad Mynach (YM)**

***Support (Representor Number-Representation Number)***

49-1872	579-1513	1088-1920	1157-170	1366-480
233-1638	768-1545	1118-148	1190-193	1660-922
579-1503	821-390	1157-169	1358-473	2014-1650

***Objection (Representor Number-Representation Number)***

108-818	1025-64	1156-1918	1228-263	1364-479	1700-1016	2028-1699
139-1527	1028-69	1158-171	1229-264	1365-478	1702-1018	2036-1732
139-1528	1029-71	1159-172	1232-268	1372-488	1709-1037	2042-1747
139-1529	1029-72	1159-173	1233-267	1373-489	1719-1052	2045-1760
579-1504	1030-73	1159-174	1235-271	1375-490	1723-1056	2046-1761
579-1505	1033-75	1163-190	1243-283	1398-519	1740-1082	2049-1771
579-1506	1037-78	1163-191	1244-282	1399-524	1746-1094	2049-1772
579-1507	1037-79	1166-417	1247-285	1402-531	1752-1126	2049-1773
579-1508	1037-80	1168-183	1254-294	1428-567	1759-1146	2049-1774
579-1509	1037-81	1172-184	1257-301	1429-569	1763-1167	2049-1775
579-1510	1037-82	1178-1278	1264-309	1452-617	1812-1227	2049-1776
579-1511	1052-97	1179-186	1289-342	1453-618	1832-1251	2049-1777
579-1512	1052-98	1180-291	1289-343	1511-704	1846-1266	2051-1782
821-385	1055-101	1187-188	1290-339	1514-707	1851-1270	2051-1783
821-386	1055-102	1189-189	1290-340	1517-710	1852-1271	2051-1784
821-387	1060-107	1190-192	1290-341	1543-744	1852-1272	2051-1785
821-388	1060-108	1192-194	1297-380	1561-761	1852-1358	2051-1786
821-389	1088-1922	1193-199	1301-392	1574-776	1853-1273	2051-1787
832-11	1088-1923	1193-200	1301-393	1580-786	1854-1274	2051-1788
832-12	1088-1924	1193-201	1311-408	1589-794	1864-1285	2054-1791
848-295	1088-1925	1193-202	1312-409	1589-795	1866-1288	2054-1792
848-296	1088-1926	1193-203	1312-517	1606-822	1870-1290	2083-1838
848-297	1088-1927	1193-204	1313-410	1622-857	1876-1297	2084-1839
848-826	1088-1928	1193-205	1314-411	1633-891	1920-1346	2084-1840
872-732	1141-157	1195-214	1315-412	1646-889	1933-1395	2084-1841
962-6	1145-161	1196-217	1330-436	1656-905	1933-1396	2086-1848
962-7	1146-167	1199-219	1342-456	1656-912	1949-1442	2130-1916
962-8	1148-949	1204-222	1344-453	1673-948	1966-1501	2131-1917
972-19	1149-163	1205-223	1345-468	1679-955	1987-1563	2132-1919
985-1003	1149-164	1210-230	1356-471	1680-964	1987-1564	
993-38	1151-165	1212-240	1360-475	1683-986	2004-1611	
1017-56	1153-166	1212-241	1362-476	1686-989	2028-1697	
1025-63	1154-168	1223-256	1363-477	1694-1001	2028-1698	

## 5. Withdrawn Representations

*(Representor Number-Representation Number)*

579-1514	Representation withdrawn at request of Representor.
579-1989	Representation submitted without permission.
1582-787	Representation withdrawn at request of Representor.
2062-1904	Representation withdrawn at request of Representor.

## 6. Representations that were not duly made

*(Representor Number-Representation Number)*

955-1905	All of these representations were received late, after 30 <sup>th</sup> November 2022.
1668-1930	
2118-1900	
2119-1901	
2119-1908	
2121-1903	
2122-1906	
2123-1907	
2124-1909	
2136-1929	
2137-1931	
2138-1932	
2139-1933	
2140-1934	