

SD17



Dyngor Bwrdeistref Sirol

Blaenau Gwent

County Borough Council

Regeneration Division



Local Development Plan

Issues Paper

Draft Report of Consultation



September 2007

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1. Background

The Issues Paper was prepared as a discussion document intended to promote debate on the issues of strategic significance for the authority. The document was placed on the Council's website and sent to Members, key officers, statutory consultees and interested parties. In total, 176 individuals/organisations were consulted. Although the formal consultation period took place over a 4-week period between 6th July and 8th August 2007, late responses were accepted.

The following is a summary of the 14 responses received, it should be noted that not all respondents answered every question.

2. Summary of Consultation

GENERAL

Question 1.1

Should the Community Plan provide the vision and objectives?

The overwhelming majority of respondents recognised that there is a need to identify a suitable vision (and objectives) for the LDP and that this should link to the Community Plan.

How addressed

The draft LDP vision reflects the Community Plan vision as suggested by the respondents.

Question 1.2

How can the Plan ensure that new development is sustainable and encourage the wider use of sustainability principles?

A number of useful comments were received on how this could be achieved reflecting different interest points. Overall it was considered possible to achieve this through strong, realistic, unambiguous policies that are deliverable. The right balance between protecting the environment and delivering economic and social sustainability was seen to be key and an integrated approach was considered necessary to achieve this.

How addressed

The SEA/SA will ensure that the plan itself is sustainable but when specific policies are written the Council will endeavour to take these responses into account and will work with key organisations to ensure policies are appropriate.

HOUSING

Question 2.1

***Do you agree with the assessment of the population situation?
Is it acceptable to use the SE Wales Strategic Planning Group figure (200) as one option for growth? What other options might be put forward?***

Five out of six respondents agreed with the assessment but one pointed out that population trends are difficult to predict, and continuation of past trends should not be assumed.

Of the six responses received, two agreed with the growth figure and three disagreed, the other stated it was a possible option. One disagreed saying that the Housing Market Assessment has demonstrated a need for 250 houses per annum.

Another suggested alternative was to provide more than 250 houses per annum, whilst another response suggested establishing a moving target and to use upper and lower control limits that lead to triggers if targets are not being met.

How addressed

It is accepted that population trends, particularly the migration element is difficult to predict, indeed, it is not our intention to assume the continuation of past trends. Further detailed work will be undertaken on this area and will be reported in a Housing Background Paper.

As there was no clear agreement, the options put forward for discussion, at the Vision and Option stage, will include three different growth options each including a range. There will be wider discussion on this issue and further background work undertaken.

Question 2.2

If a growth area is proposed, how should future growth be distributed throughout the Plan area? – Should it be based on the UDP Settlement Strategy or are there more sustainable patterns that should be considered?

Three out of seven respondents believed that future growth should be based on the UDP Settlement Strategy whilst the remaining four preferred an alternative sustainable strategy.

How addressed

A number of settlement strategy options have been included in the options.

Question 2.3

Are there settlements or areas where future development should be controlled differently?

It was accepted that some settlements are too small to accommodate growth in a successful and sustainable way. One respondent considered that key towns, such as Blaina, should be the focus for growth.

How addressed

This level of detail will be addressed in the Preferred Strategy.

Question 2.4

Are there settlements or areas where future development should be encouraged and if so, explain where and why?

The majority of responses favoured sustaining existing community areas in line with the current settlement strategy as all but the smallest settlements will benefit from the provision of new dwellings. Population increase would support local bus services, education and health provision.

How addressed

The options put forward for discussion include the current settlements strategy as one option.

Question 2.5

In view of the preference for the development of Brownfield sites before Greenfield sites should the Plan look at identifying all Brownfield sites regardless of their location and the needs of the various communities?

Three out of nine respondents agreed that all Brownfield sites should be identified but the remaining six disagreed saying it may be inappropriate. Those who disagreed emphasised that some Greenfield sites may be more sustainable and as such they should be used before previously developed land. Also it was pointed out that some Brownfield sites are richer in terms of ecological interests and should not be identified in preference to Greenfield sites. On the other hand, one respondent commented that all Brownfield sites should be exhausted especially after the loss of heavy industry in this area.

How addressed

These views will be taken into consideration when determining the detail of the Preferred Strategy.

Question 2.6

Should the Plan look at increasing housing densities generally or cater for a range of densities according to the location of the site in relation to public transport?

88% of comments received were in favour of catering for a range of densities and only 12% preferred increasing densities generally. One person stated that raising densities is in line with national planning policy and sustainable development objectives. The majority viewed that catering for a range of densities could meet a range of needs and demands.

How addressed

These views will be taken into consideration when determining the detail of the Preferred Strategy.

Question 2.7

How can the Plan cater for the Housing Needs of the ageing population?

The general consensus referred to the need for the provision of suitable housing, either by updating sub-standard dwellings (publicly or privately owned) that are occupied by elderly people or by providing housing (extra-care accommodation and smaller properties or new care homes). The housing should be provided in close proximity to existing centres, which provide day-to-day shopping needs and healthcare and also be situated where visitors can readily access them by bus, walking or cycling.

One respondent advocated incorporating a requirement for ‘lifetime homes’ design standards when building all new housing stock. Two respondents felt it important to ensure that the Older People Strategy is incorporated effectively, and the ‘need’ mapped out.

How addressed

These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 2.8

How can the Plan assist in the delivery of high quality schemes that are sustainable?

A number of useful comments were received on how this could be achieved reflecting different interest points. Overall it was considered possible to achieve this through promoting development in and adjoining the main settlements to ensure that they contribute to creating sustainable patterns of development and make best use of existing facilities, services and infrastructure. Comments received emphasized the importance of delivering high quality designed schemes, and the use of sustainable building techniques including the promotion of energy efficiency measures. Another comment received stated that the density of schemes should be raised to make more efficient use of land.

How addressed

These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 2.9

Should the threshold of 30 be reduced to ensure that the affordable housing needs of the population are met?

50% of respondents stated that the threshold should be reduced, whilst 38% preferred for it to remain at 30. The remainder (12%) commented that more work needs to be undertaken in order to ascertain a suitable affordable housing threshold and target.

How addressed

These views will be taken into consideration when determining the detail of the Preferred Strategy.

Question 2.10

What percentage of a housing site should be affordable?

Half of all respondents answered that the percentage of a housing site that should be affordable should be dependent on viability while the remaining 50% stated ‘other’. One respondent added that it may be appropriate to provide flexibility in any LDP policy to allow lower provision to ensure that the wider challenges and objectives of the LDP are realised.

How addressed

These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 2.11

What should the approach of the new LDP be in relation to the provision of new facilities?

A wide range of comments was received as follows:

- Opportunities should be maximised to associate new facilities with existing or planned facilities.
- The ‘new LDP’ should adopt a broad based approach to social facilities provision. Each section of the community should be catered for in line with its reasonable requirements, age groups projections being used to inform decision-making.
- Community facilities should be provided in locations close to a critical mass of population.
- This plan needs to take account of the Clinical Futures programme, which aims to modernise and re-shape the delivery of healthcare services across Gwent.

How addressed

These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

EMPLOYMENT

Question 3.1

Should we be looking to reallocate employment land identified in the UDP?

57% of respondents said we should reallocate employment land and 43% disagreed. One respondent stated that there is a need to identify new sites, that are appropriate and not suffering from constraints. Another commented that employment growth and economic growth are critical to the regeneration of Blaenau Gwent and that the LDP should focus on how to deliver employment growth and unlock the potential that exists. The majority of respondents indicated that if there is an over allocation of employment land, it seems reasonable to allocate surpluses for other purposes for which there is demand and the location is suitable.

How addressed

A mixed response was received on this issue. The options put forward at the Vision and Strategic Option stage provide a choice of strategies including reallocating land for employment use, as identified in the Unitary Development Plan.

Question 3.2

What type of employment land is needed?

43% of those answering thought the focus should be on diversification of our employment base, and that strong focus should be given to our service industry opportunities, such as office based employment. One respondent was concerned with the suitability of existing

land allocations and suggested that sites that do not suffer from constraints need to be identified. Another respondent pointed out that the LDP should ensure that suitable land is available for a range of employment types and provide sufficient flexibility for change in employment patterns, industries and markets. One person stated that the type of employment land needed depends upon the development of the broad Vision.

How addressed

A varied response was received on this issue. It is recognised that the economy has experienced a shift away from manufacturing to service sector and technological services and the options put forward at the Vision and Strategic Option stage provides a choice of strategies to enable wider discussion on this issue.

Question 3.3

Should existing employment sites continue to be retained for employment use with a presumption against alternative uses or should a more flexible approach be adopted?

A more flexible approach was favoured by 75% of respondents, who generally considered that it might be more appropriate to develop the sites for other uses.

How addressed

One of the options identified as part of the Vision and Preferred Strategy stage implies that employment opportunities will be catered for through the identification of mixed-use opportunity areas, with the relaxation of uses allowed on certain sites.

TOWN CENTRES

Question 4.1

What are the future roles and functions of the current retail centres in Blaenau Gwent?

A wide range of answers were received including one suggesting that the retail centres should be diversified to include service/social facilities such as libraries, health centres and leisure activity venues. It was proposed that a regional centre should be identified and promoted, whilst another answer referred to the possibility of the retail centres 'specialising' due to the difficulty of sustaining a viable retail sector in all the large towns. One respondent considered it critical that the function and role of Blaina town centre is retained and strengthened. Two respondents emphasised the role of town centres as being a focus for community interaction and a source of civic pride. Safe and attractive town centres, with well-maintained, accessible green spaces, that provide a range of amenities (retail, arts, leisure) contribute to wellbeing and positive views of the local area.

How addressed

No definitive view was received. The need to find a role and function for the town centres has been highlighted as a key issue for the County Borough and the options put forward for the Vision and Option stage provides a choice of strategies for wider discussion on this issue.

Question 4.2***Should we look to identify which towns have the most potential for retail?***

57% of respondents considered that we should look to identify those towns with the most retail potential, with 43% of respondents disagreeing. One suggested that the retail role of the five towns identified should be consolidated as they currently serve the population and should be retained and strengthened rather than dispersing development to other settlements. Another stated that the Wales Spatial Plan would promote an Ebbw Vale focus. One comment received referred to the recognition that to maintain five equally vibrant towns within the Borough is not a realistic proposition but conversely, to concentrate on the three largest towns only, would be to neglect a duty of care to the smaller towns.

How addressed

A varied response was received on this issue. The Options put forward provide a choice of alternatives for wider discussion on this issue.

Question 4.2***Should we look to reassess the retail hierarchy and retail boundaries of the town centres?***

57% of respondents agreed with the above question, whilst 43% disagreed. One specified that boundary changes might lead to more town centre shops and other facilities being readily accessible to users who walk or cycle.

How addressed

A mixed response was received on this issue. The Options put forward provide a choice of strategies including retaining the five town centres of Tredegar, Ebbw Vale, Brynmawr, Abertillery and Blaina to be the focus of shopping, commercial, cultural, social and leisure activity. Alternatively, another option looks to developing a new hierarchy for the town centres.

Question 4.3***How can we promote vibrant and vital town centres?***

According to 43% of respondents environmental improvement and enhancement is a way in which to promote town centres. Other suggestions received were to develop an attraction to entice people into the town centre, (such as a market, museum, a cinema or street entertainment), to increase the population living in and close to the town centres, and to create a clean, safe and pleasant environment.

How addressed

A mixed response was received on future approaches to promoting vibrant and vital town centres. It is agreed that environmental improvements and enhancements and encouraging a mix of uses into the town centre will create a safe and pleasant environment that people will want to live, work and visit.

Question 4.4***Should the Plan encourage a mix of uses in the town centre?***

83% agreed that a mix of uses should be encouraged whilst 17% disagreed. There was a general recognition that providing a mix of uses is an important policy tool in promoting vibrancy and vitality in town centres.

How addressed

It is accepted that providing a mix of uses is an important policy tool in promoting vitality and viability in town centres. These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 4.5

Does the plan need to identify additional retail space?

All respondents agreed that there was no justification in terms of demand to allocate more retail space as the current town centres are struggling. A comment was received that existing opportunities, such as vacant units should be exploited before further development is allowed.

How addressed

There appears to be no justification in terms of demand to allocate more retail space. However, a study may be required to clarify this issue.

Question 4.6

Should the Plan aim to protect local shopping facilities?

All respondents agreed that the essential day-to-day functions within all towns should be protected to help reduce the need to travel to other centres outside the local neighbourhood.

How addressed

It is agreed that local neighbourhood centres provide a very important role within the shopping hierarchy. These facilities are important to those with limited access to transport and provide an important source for people's day-to-day needs. These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

TRANSPORT

Question 5.1

What policies can be put in place to ensure that the new rail access and facilities proposed at the former steelworks site aid the regeneration of the wider area?

A number of useful comments were received on how this could be achieved. It was considered that policies were required to ensure integrated transport options including bus, cycleway and footpath links to stations. The provision of adequate parking and a park and ride service was proposed by several respondents. Also, bus links to peripheral employment areas, e.g. industrial estates would be a useful way to regenerate the wider area. Other ideas put forward were to use the new railway station as a central hub and link other important sites to it, including the town centre and to locate housing development close to public transport routes (such as the new railway), the main road

network and the key settlements. The design and build of the rail access and facilities should minimise harm to the environment.

How addressed

These views will be taken into consideration when determining the detail of the Preferred Strategy.

Question 5.2

Are there specific measures, which could be taken to encourage the use of a range of different forms of transport?

89% of respondents indicated that measures could be introduced to encourage a range of transport modes. It was felt this could be achieved by providing a high quality transport system, including promoting bus provision (possibly using mini-buses) for commuters to larger industrial estates. Also, development should be located near other land uses that currently benefit from public transport and good road access. Other potential measures cited were to reduce the provision for cars, to introduce safe routes to stations (bus and rail), schools and workplaces, to promote walking and cycling for shorter trips (by providing cycle tracks, cycle hire and secure parking). Education of the public, through climate change warnings, could encourage them to reduce their travel, especially by car and it would be useful to encourage workplace car-share.

How addressed

These views will be taken into consideration when determining the detail of the Preferred Strategy and detailed policies in the Deposit Plan.

Question 5.3

Are there specific road, rail or other infrastructure improvements that are required?

67% of respondents identified improvements, which are required. These were:

- Ebbw Vale Town Bypass.
- A return to an integrated rail and bus transport system
- Consideration will need to be given to requirements in relation to both the new Ysbyty Aneurin Bevan hospital and also the planned Specialist and Critical Care Centre.

How addressed

These views will be taken into consideration when determining the detail of the Preferred Strategy and detailed policies of the Deposit Plan.

Question 5.4

How should transportation policies influence the future location of development?

The majority of views received emphasised that the location of existing and future transport routes should be a key determinant of where future development is located. As such policies should support frequent and convenient bus and rail networks, cycle paths and pedestrian routes being located in the vicinity of existing and proposed developments. Also, it was felt that transportation policies should target communities where there is low private car ownership to overcome the problems associated with isolation.

How addressed

The distance to public transport will be one of the considerations taken into account in assessing the suitability of sites. These views will also be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 5.5

What actions/policies are needed to create safer neighbourhoods for people to walk and cycle?

Respondents indicated that the following measures could be taken to improve safety for people to walk and cycle:

- The presence of Urban and Countryside Wardens contribute to personal safety and to the perception of security, as does Police patrolling on foot;
- Footpaths and cycle tracks through residential areas should be well, but not excessively illuminated after dark, and should be overlooked by residences;
- The urge to close off alleyways that are claimed to harbour criminal activities should be resisted; it does not always result in crime reduction, and interferes with the rights of walkers;
- Footpaths and cycleways should be separated from roads, and as far as possible, the two uses should be segregated;
- Directing growth to areas close to services and infrastructure can promote walking and cycling trips;
- To have an appropriate network of local routes across the 3 main valleys of the Borough and links to regional routes;
- Improved design in terms of safer neighbourhood planning; and
- By converting old railway lines to cycle paths.

How addressed

These views will be taken into consideration when determining the detailed policies for inclusion in the Deposit Plan.

ENVIRONMENT**Question 6.1**

How can we ensure that biodiversity is protected and enhanced within the County borough?

It was generally felt important to protect the land of greatest biodiversity merit from undesirable development. Many respondents thought that protection could be afforded by promoting the designation of more Sites of Importance for Nature Conservation locally. It is considered crucial to include policies in the LDP that make it difficult for developers to gain planning permission for works that will have an unacceptably adverse impact on areas designated for their ecological importance. Policies should be aimed at protecting local landscapes of high value for their visual and historic qualities with the use of LANDMAP. Biodiversity can also be enhanced by establishing wildlife corridors and seeking to reverse the fragmentation of habitats. One respondent believed that development should be regarded as an opportunity and not as a threat and that

biodiversity could be linked to development. Also, the Council should seek enhancements as part of developments, for example the creation of ponds and wetland areas.

How addressed

These views will be taken into consideration when determining the detailed policies for inclusion in the Deposit Plan.

Question 6.2

How can policies in the LDP identify, protect and enhance local landscape?

Responses indicated that this was achievable by ensuring development (design, use of materials etc.) is sympathetic to the locality. Enhancement, where appropriate, should find a place in protective policies and in those designed to regulate development in these designated areas. Another comment received was that policies should take a holistic view of landscape and promote the idea of green connectivity, that is, green corridors that can provide ecological links, such as river corridors, hedgerows and woodlands. One respondent felt that planning policies should be used that are criteria based as blanket designations can put high quality land at risk from development and restrict development on land that could be released to help achieve the aims of the LDP. Another felt that policies should be adopted to ensure adequate protection against potentially undesirable schemes, possibly wind development and waste disposal.

How addressed

These views will be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 6.3

Is the countryside within the Plan afforded too much/too little or sufficient protection from development?

50% of respondents said there is sufficient protection, 33% said too little and 17% believed there to be too much. One respondent thought there is a need to identify more sites for protection, (SINCs), whilst another commented that limited development in the countryside could have positive results. One stated that there are other considerations, such as the social and economic aims of the LDP.

How addressed

Generally the current level of protection was considered sufficient which indicates that current urban boundary policies and environmental policies are working. This will be taken into consideration when determining the detailed policies of the Deposit Plan.

Question 6.4

Should the existing boundaries of such areas be examined to determine their accuracy?

83% of responses agreed that the boundaries should be reviewed. It was felt that as SINCs are currently being identified there is a clear need to determine their boundaries and adequacy. A respondent commented that the use of Special Landscape Areas within

the LDP need to be reassessed using LANDMAP. A further comment was that the Green Wedge designation should be re-examined and adjusted accordingly.

One stated that it would be difficult to comprehensively reassess the adequacy of all land and boundaries and that it may be more appropriate to use criteria based policies that require development proposals to consider the quality of the landscape etc.

How addressed

It is the Council's intention to review the boundaries of the Special Landscape Areas through the use of LANDMAP information.

Question 6.5

Is the UDP approach to identifying Mineral Exclusion Zones acceptable?

The approach was found to be acceptable by 50% of respondents and unacceptable by the remaining 50%. It was regarded as unacceptable because the reference to current mineral exclusion zones includes areas 'where there would be an undue impact on the environment', does not specifically mention the water environment or water resources. Another disagreed stating that the approach should be amended to bring it into line with existing minerals planning guidance.

How addressed

No definitive answer was received on whether the approach is acceptable. When specific policies are written the Council will work with key organisations to ensure this issue is dealt with appropriately.

Question 6.6

How can renewable energy resources be harnessed without causing undue harm to the environment or the quality of life for local communities?

A wide range of comments were received:

- A suitably worded policy should be adopted to assist in embracing any developments that are appropriate and refusing those which are not.
- Some work on identifying suitable locations for renewable energy production could be conducted to help inform future use. LANDMAP could be used to identify suitable locations for future wind energy production.
- More extensive community involvement, particularly with small-scale schemes may help to extend their use and avoid harm to the environment and quality of life.
- In locating and constructing renewable energy projects, consideration should be given to the protection and enhancement of water features in the area, including wells, springs and watercourses.
- One respondent recommended a full assessment of renewable energy projects.

How addressed

When specific policies are written the Council will take these responses into account and will work with key organisations to ensure policies are appropriate.

LEISURE, RECREATION & TOURISM

Question 7.1**Is there adequate protection of open spaces?**

71% of respondents believed there is adequate protection, whilst 29% thought there was not adequate protection. One respondent suggested that there was not enough adequate protection for existing open spaces and that local designations should be encouraged, for example nature reserves, or parks for these areas, in addition to the National Park. Another commented that the protection and enhancement of green corridors and the countryside should be given sufficient weight.

How addressed

These views will be taken into consideration when determining the detailed policies for inclusion in the Deposit Plan.

Question 7.2***Should local standards be further developed or examined against NPFA standards?***

The majority of those answering said that local standards should be applied and one respondent commented that the Council should consider local need, and policies requiring the provision of open space should provide this flexibility. Also, it was considered that in the light of recently proposed NPFA changes, it is desirable that local recreational space standards should be examined.

How addressed

It is the Council's intention to judge local provision against NPFA standards and reassess local standards if appropriate.

Question 7.3***If a need for more land is identified in the open space assessment where should this be located?***

A range of comments were received and it was thought that new facilities should be provided close to large populations, where there is a clear current deficiency and close to public transport routes to minimize environmental impact. Open space should be accessible and integral part of local communities. There should be connectivity between local green space and the wider countryside e.g. Common Land. One respondent was concerned that recreational open space areas should not compromise areas that might have sensitive ecological value and argued that the development of new open space land would require ecological assessment

How addressed

No specific examples of locations were received but comments will be taken into account when allocating sites.

Question 7.4***In addition to current provision are there additional opportunities for developing tourism within the Plan area?***

The overwhelming majority agreed that opportunities for tourism did exist. Several comments referred to the potential of Bryn Bach Park suggesting that a high quality hotel and chalets should be located there. Another respondent stipulated that the prevention of inappropriate developments would positively affect Blaenau Gwent's potential for developing as a tourist area. It was also considered that policies could promote freshwater fishing as a form of tourism and the following local ponds were proposed to be suitable for developing opportunities for angling: Blue Lake (top) St Ives Lake (middle) and McHardings pond (bottom) map ref SO 15410.

How addressed

Two of the three options put forward at the Vision and Option stage refer to expanding and encouraging tourism facilities.

Question 8.1

Are there any other issues?

A number of other issues were indicated by respondents. Waste management was identified in 43% of the answers received, both in terms of how we intend to accommodate disposal of our own wastes (particularly municipal), and also in terms of policy for the appropriate manner for dealing with commercial proposals of this nature.

Another suggested issue was that the development of education and skills for the viability of future communities needs to be recognised. One respondent said it might be helpful to consider 'vulnerable community sites' as a specific issue because some communities are more vulnerable than others to the effects of surrounding land use.

It was also considered that environmental issues such as forestry and agriculture (in particular protection of valuable soil areas) and water (in particular consideration of water resources, consumption and flooding) need to be taken into consideration. One suggestion as an issue was that viability and flexibility should be taken into account when creating the policies to be included within the LDP.

How addressed

These issues will be taken into account in determining the detail of the Preferred Strategy and Deposit Plan.

3. Next Stage

Where appropriate these responses have been taken into consideration in the preparation of options which are to be discussed at Vision and Options workshops in November 2007. Following this the Council will draft the 'Preferred Strategy' for consultation in September 2008.

Appendix A: List of Consultees

NAME	ORGANISATION
	Blaenau Gwent County Borough Council
Alan Reed	Environment
Alison Hoskins	Soc Services
Alun Evans	Environment
Alwyn Hughes	Environment
Alyson Tippings	Environment
Andrew Long	Environment
Andrew Parker	Governance
Angela Chard	Resources
Bernadette Elias	Governance
Bethan Cartwright	Environment
Bridget Powell	Environment
Chris Engel	Environment
Clive Rogers	Environment
Colin Cheesman	Environment
Dave R Cook	Environment
Dave Thompson	Environment
Dave Watkins	Environment
Deborah Beeson	Environment
Eirlys Hallett	Environment
Frank Olding	Environment
Ged Mchugh	Environment
Hayley Selway	Environment
Jenny Turner	Environment
Jim Allen	Environment
Joanna Rhead	Resources
John Howells	Education
John Parsons	Environment
Julian Bosley	Environment
Keith Chaplin	Environment
Keith Rogers	Environment
Leanne Connor	Environment
Louise Horner	Estates
Lyn Evans	Environment
Lynn Phillips	Community Services
Mark Hopkins	Environment
Mark Price	Environment
Michelle Evans	Education
Nick Landers	Environment
Paul Miles	Governance
Phil Hodgson	Social Services
Phillip Hackling	Environment
Richard Crook	Corus Project Team
Roderic Jenkins	Environment
Ruth Sinfield	Social Services

Appendix A: List of Consultees

Sharn Annett	Education
Simon Dobbs	Environment
Steve Smith	Environment
Tony Chivers	Environment
	External Organisations
Elaine Ancrum	National Assembly for Wales
Jackie Walters	Environment Agency
Tracy Nettleton	Brecon Beacons National Park
Mr N Davies	Merthyr Tydfil County Borough Council
Mr R Murray	Torfaen County Borough Council
Mr Steve Bartlett	Nantyglo and Blaina Town Council
Dr J Evans	Tredegar Town Council
Richard Jones	Countryside Council for Wales
	Cadw
Mrs Rhian Kyte	Caerphilly County Borough Council
	Powys County Borough Council
Mr G Bartlett	Abertillery & Llanhilleth Community Council
Mrs A Davies	Brynmawr Town Council
Mr J P Williams	Rhymney Community Council
Mrs D Gronow	New Tredegar Community Council
Local Network Planning	British Telecom
	NTL
	Virgin Mobile
	Lattice Property
	British Wind Energy Association
	Celtic Energy Ltd
Mr Rhian Deakin	Blaenavon Town Council
Mr Ryan Bowen	Hyder Consulting Ltd
	Mobile Operators Association
Richard Bevan	Blaenau Gwent Local Health Board
Mr Neil Dalley	British Gas (TRANSCO)
Mr K Ferguson	Coal Authority
	Confederation of UK Coal Producers
Dr Emma Wilson	Innogy plc
Mr Ed Wallace	Powergen
	SWALEC
	Dwr Cymru Welsh Water
	Department for Transport
	The Home Office
Mr Jonathon Jones	Wales Tourist Board
	National Grid Transco plc
	RWE npower
	Western Power Distribution
	Wales and West Utilities
	Department of Trade & Industry
Mr Allan Fogg	Defence Estates
	Glamorgan Gwent Archaeological Trust Ltd

Appendix A: List of Consultees

Stuart Newland	S. East Wales Regional Waste Group
Dr Jane Layzell	N.P.H.S
Mr A J Jenkins	Rhyd Developments Ltd.
Adrian Drew	A.H.D Designs
PC Andy Harris	Police Architectural Liaison Officer
	Friends of the Earth (Cymru)
Michael J Harris & Assoc	Local Planning Agent
Peter Barnes &	Local Planning Agent
Graham Worthington	Local Planning Agent
Mike Cuddy	Department of Enterprise, Innovation & Networks
	LDP Forum
Jeff Harris	ARPP
Darren Wright	Capita Symonds
Sarah Fotheringham	Glamorgan & Gwent Housing Association
Richard Jones	Countryside Council for Wales
Mr Richard Bevan	Health Board
Ernie Pitt	Base Handling Products
Kerry Diamond	Continental Teves
Mike Garland	M & J Europe
Matthew Simon	Environment Agency
Jane Layzell	Local Health Board
John Hopkins	BGCBC Leader
Dennis Owens	BGCBC Executive Member
Jane Mcneil	BGCBC - Community First
Patrick Lewis	Heads of the Valleys Programme
John Morgan	Tredegar Town Council
Victoria King	Coleg Gwent
Frank Callus	Coleg Gwent
Wayne Thomas	RISE
Jeremy Gass	University of the Valleys
Pat Tagg	Job Centre Plus
John Davies	Ebbw Vale & District Development Trust
Huw Lewis	GAVO
Anita Thomas	Princes Trust
Brian Kember	Tredegar Development Trust
Chris Jarvis	Venture Wales
Gareth Matthews	Working Links
Clair Stonelake	Department of Enterprise and Innovation Network
Stephen Byrne	Spatial Support and Regeneration Branch
Margaret Hunt	CPRW
Neil Maylan	Glamorgan and Gwent Archaeological Trust
Richard Price	The Home Builders Federation
Jeff Pride	Herian

Appendix B: Detailed Consultation Responses

Comment	Respondent
1.1 Should the Community Plan provide the vision and objectives?	
Too many guidelines & strategies in place already. One cancels or contradicts the other.	A.H.D Designs
The Community Plan is the framework for service delivery and the LDP needs to support this. However, this does not mean that the Vision and Objectives cannot be reviewed (along with the Community Plan itself). No Plan should restrict this need to re-evaluate objectives if considered necessary.	B.G.C.B.C. (Assistant Director of Education)
More work. The LDP should respect both, ideally - there are obviously a variety of local factors, specific to the needs of Blaenau Gwent, that will be accommodated by the Community Plan; the LDP, however, needs also to reflect wider policy, in order to ensure that we do not suffer any loss of opportunity via being too parochial, particularly in an economic sense. Liaison with relevant representatives for the bodies listed above, together with others, will be essential if the LDP is both to be underpinned (in a strategic sense), as well as to underpin, wider objectives, as part of a regional/ sub regional effort. Two way inter-relation, for mutual benefit.	B.G.C.B.C. (Business Environment Local Coordinator)
More work. The LDP sits one level below the Community Plan in Plan Rationalisation therefore there does need to be direct links between them. However, the LDP can have its own vision, which sets out what it will deliver and links in a 'spatial context'. It should however, be closely linked to the overall vision contained in the Community Plan. As for the aims and objectives of the exercise, these should be focused specifically on the purpose of the LDP and build up the detail. Whereas the Community Plan will have broader strategic aims and objectives that summarise not only LDP aims, but also the other plans identified through Plan Rationalisation.	B.G.C.B.C. (Research Officer)
The key relationship between the Community Strategy and LDP is that the latter should give the spatial expression to the elements of the LDP that relate to the use and development of land. The Community Strategy should provide the overarching steer for the vision and objectives of the LDP. However, it will be necessary to ensure that the Community Plan as currently written is appropriate for this purpose. Therefore, more work may be required to ensure compatibility with National	C.C.W

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<p>guidance including recent policy changes. As you will be aware all Community Plans are due to be reviewed in 2008. The plan should also take into account the objectives and targets of the Wales Environment Strategy.</p>	
<p>(1) The Community Plan 'vision and objectives' must be relevant to the LDP policy if they are to be carried over into the latter document. They must also be consistent with national guidelines. (2) It is probable that more work should be undertaken.</p>	C.P.R.W.
<p>DTZ appreciate the vision and objective. However, the Community Plan has a timeframe of 2005-2009, whereas the LDP timeframe extends to 2021. Regard should therefore be had to the post 2009 objectives, and the need for sustainable growth for example.</p>	D.T.Z.
<p>We accept the aim with regards to the environment and agree with this. As the LDP process progresses we are likely to request additional detail on environmental issues and input into policies with relation to flood risk, foul drainage, land contamination and biodiversity, for example. We would welcome the opportunity to discuss this in more detail with you.</p>	Environment Agency
<p>The Vision should incorporate objectives from a wide range of relevant and up-to-date guidance documents. The Council should also ensure that the Vision is realistic and deliverable, in light of the policy approaches that will aim to achieve it. Therefore the HBF believes that more work should be to identify a suitable vision for the LDP.</p>	Home Builders Federation
<p>The aim of the LDP should be to ensure that the natural and built environment supports the implementation of the Community Plan by maximising opportunities for:</p> <ul style="list-style-type: none"> • economic development • community development • transport • community safety • heritage and culture • health and wellbeing • play, leisure and recreation • natural habitats and biodiversity 	NPHS

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<p>It is recognised that each of these may have competing priorities with others, but all can potentially contribute positively to health and wellbeing. The LDP should therefore strive to find an acceptable balance between them that prioritises a positive impact on health and well-being.</p>	
<p>Provide the vision and objectives, however, circumstances change and I think yearly recommendations could be made.</p>	Rhyd Developments Ltd.
<p>1.2 How can the Plan ensure that new development is sustainable and encourage the wider use of sustainability principles?</p>	
<p>My view is that it can't.</p>	A.H.D Designs
<p>Issues need to be considered in relation to the general vision for the area. Emphasis may need to be given to 'Quality of Life' issues and matters such as the extent of Housing Development Density, Industrial development etc. Development can support sustainability and bio-diversity through an integrated approach.</p>	B.G.C.B.C. (Assistant Director of Education)
<p>In part from the Environment Agency, on an early & ongoing basis, throughout development of the LDP. Plagiarism of "best practice" from other, "flagship" authorities, where local & national policies are being seen to be successfully interpreted & implemented (perhaps via their "Community Plans", or some other, appropriate vehicle). Adherence and adoption of core environmental concepts, Such as the Waste Hierarchy & the proximity principle, particularly in terms of their incorporation into any local developments and proposals as a core pre-requisite.</p>	B.G.C.B.C. (Business Environment Local Coordinator)
<p>Firstly, it is important to recognise that the plan will need to ensure there is economic, social and environmental sustainability, and not just focus on the environment implication as has often been the case. Even so, sustainability is a key principle that should cut across all Council business and is being considered as a key part of the 3-year Business Planning Model/Financial Strategy the Council is moving towards. The Council through its WPI requirements will be considering sustainable performance, as this will inevitably affect service provision. All strategic processes should therefore, be subject to critical sustainable appraisal. One possible option is for the LDP to drive the Council's Environment Assessment Policies, and mirror this for Sustainability.</p>	B.G.C.B.C. (Research Officer)
<p>Whilst the Plan itself will be subject to SA and SEA, it will be important that individual site allocations are assessed to see how they contribute to or affect socio-economic and environmental considerations. A sustainability checklist should be used to assess individual allocations.</p>	C.C.W

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<p>Sustainability appraisal must be built into the plan-making process from the outset. Strong and unambiguous policies must be agreed that are not easy to challenge by opposing interests.</p>	<p>C.P.R.W</p>
<p>The Plan and the SA/SEA should embrace the full economic, social and physical aspects of sustainable development in addition to the land use planning considerations. This should include supporting, strengthening and growing existing communities, businesses and key settlements.</p>	<p>D.T.Z.</p>
<p>We would seek to ensure that all environmental issues are considered, including in any strategic sites, allocated sites, policies, Strategic Planning Guidance (SPGs) and SEA work.</p> <p>We would recommend that opportunities for environmental improvement be sought through positive enhancement measures. Any resulting environmental betterment should be maintained.</p> <p>The outcomes of the SEA process should be taken into account within the LDP with an emphasis on environmental issues.</p> <p>There is one SAC located within Blaenau Gwent: Usk Bat Site SAC. We advise that you consult with CCW regarding the need for an appropriate assessment under the Habitats Regulations as part of the plan.</p> <p>The LDP should focus on key environmental issues. We have identified the five key environmental priorities in Blaenau Gwent to be:</p> <ul style="list-style-type: none"> • Flood risk • Urban regeneration/ land contamination • Waste • Air emissions • Sewage infrastructure 	<p>Environment Agency</p>
<p>The Plan must recognise the whole meaning of the term sustainability. Sustainability not only focuses on protection of the environment and natural resources, but also aims to develop the social and economic progress of the people living within Blaenau Gwent. Therefore, it is essential that the Plan includes realistic and deliverable policies in order to achieve the right balance of development. In the</p>	<p>Home Builders Federation</p>

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<p>context of housing, considering the housing crisis in Wales at present and the problem of increasing property prices throughout the UK, the HBF would encourage the Authority to produce housing policies that are viable and that encourage schemes to proceed. The Plan should also create policies that aim to capitalise on areas that are most attractive to investment, in order for them to flourish and spread wider benefits throughout the Local Authority.</p>	
<p>Regular monitoring, polls, especially as the area also houses commuters, which I feel is new to the area but essential.</p>	<p>Rhyd Developments Ltd.</p>
<p><u>HOUSING</u></p>	
<p>2.1 Do you agree with the assessment of the population situation?</p>	
<p>Yes</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Yes. Although the answer is 'yes' the plan should set initial targets that set out the stabilisation of the population. As noted, population loss is not a new trend in Blaenau Gwent, but historical. Therefore, with this in mind the initial aim could be stabilising the population, followed by more optimistic policy statements to increase our population.</p> <p>Even so, further analysis should be undertaken to investigate patterns of internal migration within Blaenau Gwent, to estimate how much of the proposed increase in housing stock will be met by people already living within the area. (Using the Victoria Site as a prime example).</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>No. CPRW basically agrees with the 'assessment of the population situation', but has answered NO. I elaborate below Pages 8/9, 3rd and 4th paragraphs under The COUNTY BOROUGH PICTURE - there is an apparent discrepancy between the statement 'population loss is being stemmed' (3rd paragraph) and the information as to the declining population in the 1st sentence in the 4th paragraph. Page 9, under Housing Strategy for Blaenau Gwent (2004-2009) 1st paragraph, 3rd sentence – there seems to be up to 10% housing type unaccounted for. Into what classes do these fall; blocks of flats, accommodation above shops, mobile homes, other?</p>	<p>C.P.R.W</p>

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<p>Page 9, under the above heading, 2nd paragraph, 2nd sentence- there is confusion about 'unfit' dwellings in that both the 1 in 12 and 1 in 5 categories relate to the 'private' sector. Does the 1 in 5 figure represent owner-occupied unfit residences?</p> <p>Page 9, under Local Housing Assessment (2007), 1st sentence – it has to be assumed that since low wage earners in Blaenau Gwent cannot afford higher-priced houses, it would appear that prices have either been forced up by national market trends, or houses for sale have recently been purchased by more affluent newcomers to the area, replacing some of those who have out-migrated.</p>	
<p>Yes.</p>	<p>D.T.Z.</p>
<p>Population trends are difficult to predict, and continuation of past trends should not be assumed. The 'Heads of the Valleys' strategy and the opening of the new railway could result in an influx of working age people seeking cheaper housing and a more rural environment with good transport links to employment in Cardiff and the M4 corridor.</p>	<p>NPHS</p>
<p>Yes.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.1 Is it acceptable to use the SE Wales Strategic Planning Group figure as one option for growth?</p>	
<p>No. Possibly not all issues are yet clearly identified, for example, the extent and pace of labour migration.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Possibly, but care needs to be taken if we set stretched targets that are undeliverable. It is highly likely that demand will continue to be fluid, particularly for a Plan that will cover of a period over 15 years. If we considered our completions rates over the last 9 years (average 100/year), achieving the targets set by UDP is proving to be difficult, increasing this by double would obviously have significant implications, not only for housing land but also appropriate amenities. Setting a target of 200 per year would indicate a positive and forward thinking vision, which would need a considerable amount of planning and monitoring.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Yes. CCW feel that this is an appropriate starting base that may be refined at a later date.</p>	<p>C.C.W</p>
<p>Yes.</p>	<p>C.P.R.W</p>
<p>No. The Housing Market Assessment has demonstrated a need for 250 houses per</p>	<p>D.T.Z.</p>

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<p>annum. It is important that the County Borough meet this need given the aim of increasing and improving housing stock and choice. This aim is set in the context of an increasing population, and in particular, an increasing number of households.</p>	
<p>No. Because we are a different type of population and needs differ.</p>	Rhyd Developments Ltd.
<p>2.1 What other options might be put forward?</p>	
<p>Use of statistical information already available and more local analysis of need.</p>	B.G.C.B.C. (Assistant Director of Education)
<p>Consider establishing a moving target and use upper and lower control limits that lead to triggers if targets are not being met.</p>	B.G.C.B.C. (Research Officer)
<p>Another option the Council may wish to consider would be to provide more than 250 houses per annum. This would help to address issues such as increasing the population, housing affordability and improving the quality of the housing stock.</p>	D.T.Z.
<p>We have no comments on these questions. Any option for population growth should consider the capacity of other factors, such as the environment, to meet such growth, for example, there should be planned infrastructure for sewerage disposal and adequate water supply should be in existence.</p>	Environment Agency
<p>The HBF understands the Council's concerns relating to raising the housebuilding rate and stemming out-migration, however the Federation is concerned with the relatively high housebuilding rates quoted within the Issues Paper and the effect they might have on the overall housing apportionment figure for South East Wales. The option for a housebuilding target figure within the Issues Paper of 200 units per annum far surpasses any housebuilding rate that has been achieved in the County Borough over the last 10 years.</p> <ul style="list-style-type: none"> • Over the last 5 years the annual build rate was – 120 average • Over the last 10 years the annual build rate was – 96.4 average • Over the last 10 years the highest build rate was 136 houses. <p>In addition to this, the UDP aimed to stem the tide of out migration and has thus far failed to do so, despite the many policy approaches included within the document. The HBF acknowledges that the work proposed within the Heads of the Valleys</p>	Home Builders Federation

Regeneration Programme will have certain effects on the regeneration of the area, but those effects are not yet quantified and the Federation believes that more work needs to be undertaken in order to propose a housebuilding figure for Blaenau Gwent that will be realistic and achievable.

In terms of the housing apportionment exercise conducted under the requirements of the Ministerial Interim Planning Policy Statement 01/2006 – Housing, the Issues Paper states that the housebuilding rate has been ‘agreed’ for Blaenau Gwent at 200 units per annum. However, the apportionment exercise is still considered to be in draft form and none of the individual Local Authority figures proposed by the SEWSPG have been finalised. The HBF also has serious concerns with the apportionment process itself and believes that it is flawed from many perspectives and requires more weight and statutory status in determining housebuilding requirements at a local authority level. The HBF also considers the proposed apportionment to be incorrect for many of the different LAs, particularly Cardiff, which has proposed a housebuilding rate that is not representative of recent trends, need and demand, proposed economic development rates or the market. In this context, the HBF believes that the Issues Paper should take account of these points and should recognise that the figure of 200 units per annum has not been ‘agreed’ as a realistic and deliverable housebuilding target for Blaenau Gwent, but is an aspirational figure that is still subject to challenge in relation to its regional context.

Notwithstanding this, even though the proposed apportionment at a local level is subject to a certain amount of challenge, the overall WAG regional apportionment has been agreed by the South East Wales Strategic Planning Group, and therefore the figure of 108900 dwellings remains a major consideration when discussing the level of housing proposed for each Local Authority. If a level of housebuilding to the extent of 200 units per year can be sustained within Blaenau Gwent, the HBF agrees that the area has the potential to reduce out migration in line with the Council aspirations. However if it cannot, the HBF is concerned with the implications this would have to the overall housing projection for SE Wales and the fact that it has the potential to take a proportion of the allocation away from places that will require and indeed sustain higher levels of housebuilding. This may have detrimental effects on the SE Wales region as a whole and the objectives of the City Region concept as prescribed within the Wales Spatial Plan. It may also have

knock-on effects to the social and economic regeneration of Blaenau Gwent and the success of the Heads of the Valleys regeneration project.

In terms of the housing figure derived from the Blaenau Gwent Local Housing Market Assessment (250 units p/a), the HBF has concerns with the way in which the Assessment has been undertaken. Page 6 of the Blaenau Gwent Local Housing Market Assessment gives an account of the Strategic Policy Context the report has been related to, however, the text seems to omit several guidance documents from the Welsh Assembly Government that are considered essential when carrying out Local Housing Market Assessments. The key document missing from the text is The Local Housing Market Assessment Guide (March 2006).

The Local Housing Market Assessment Guide (March 2006) states that Local Housing Market Assessments reflect the Governments objective in developing sustainable communities. The guide also states that accurate information and a sound evidence base are essential to inform planning and housing policies and to ensure the most appropriate and cost-effective use of public funds. One of the key criteria of the LHMA is that the work should be undertaken in partnership with key stakeholders, particularly private developers. This is echoed in the Ministerial Interim Planning Policy Statement 01/2006 – Housing, which states that Local Authorities Planning and Housing Functions MUST combine in partnership with local stakeholders, including private housebuilders, to produce Local Housing Market Assessments. The HBF has no record of any correspondence from the Council in relation to forming a partnership with private developers to undertake the work involved in the Blaenau Gwent Local Housing Market Assessment, and the Council has confirmed that no such consultation procedures have been initiated. Therefore, as that the Assessment has not been subject to necessary the stakeholder involvement as indicated above, the Federation believes it is contrary to the Welsh Assembly Government Guidance in relation to providing a robust assessment of the housing market. As a consequence, any figures generated from this Assessment should not be used within the Issues Paper as a potential housing requirement for Blaenau Gwent.

Conclusion

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<p>Considering the information above, the HBF believes that more work needs to be done in order to arrive at a housebuilding figure that would be realistic and deliverable for Blaenau Gwent. The Federation believes it is essential for the success of the South East Wales City Region that the overall housing apportionment figure is distributed based on sound evidence and justification, and the Federation believes the Council should seriously consider the context of the wider region when proposing a suitable housebuilding figure for the area.</p> <p>In terms of the Local Housing Market Assessment, the Federation believes that this should be re-visited and undertaken with the appropriate amount of consultation as required by the myriad of Welsh Assembly Guidance documents on the subject, in order to produce a robust and credible evidence base to inform the Issues Paper and LDP.</p>	
<p>On the lines of the old key worker strategy I still think would help the valley</p>	<p>Rhyd Developments Ltd.</p>
<p>2.2 If a growth area is proposed, how should future growth be distributed throughout the Plan area? - Should it be based on the UDP Settlement Strategy or are there more sustainable patterns that should be considered?</p>	
<p>Other sustainable strategy. The Development guide should be to encourage the competitiveness to improve status. All individuals have the need to improve. Affordable in the traditional valley housing freed up by people wanting to improve & move up the housing ladder.</p>	<p>A.H.D Designs</p>
<p>Opportunities for growth in Valley areas are limited and are usually confined to Valley floors. Careful consideration needs to be given to the most appropriate uses of this limited space to provide sustainable communities where 'quality of life' and personal opportunity are given a high priority.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Other sustainable strategy. As stated earlier stabilisation should be a drive factor, and further analysis should be done to investigate areas of heavy population loss, and how these effect the local situation.</p> <p>As well as this growth we should take into consider National and Regional focus, e.g. those outlined in the Spatial Plan and Heads of the Valley Strategies.</p> <p>Growth needs to be sustainable.</p>	<p>B.G.C.B.C. (Research Officer)</p>

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<p>Other sustainable strategy. Growth needs to take account of whole of the Borough area and needs to consider geographical spread. This needs to take into account the connections to retail centres and other local services including requirements to have sustainable and integrated transport options to allow access to these services.</p>	C.C.W.
<p>Strategy outlined. The current Settlement Strategy is a sound one – all but the smallest settlements will benefit from the provision of new dwellings. It is also sustainable. While a good case can be made for large-scale housing provision on the Steelworks site at Ebbw Vale as a component of mixed-use development, this must not be allowed to override the Settlement Strategy principle.</p>	C.P.R.W
<p>Strategy outlined. The most sustainable option is to direct growth to the main urban settlements. They currently provide the services and infrastructure the populations require. The more efficient use of land and sustainable urban extensions can help to support and strengthen local services and infrastructure. Blaina is one of the main towns and has a range of services and shops and is well integrated into the public transport and road network. However, it is clear that the town is struggling to retain shops and services. It is critical that the population of Blaina is increased to maintain its role in the settlement hierarchy and fulfill the aims of the Councils Settlement Strategy. Planning Policy Wales seeks to locate housing in areas accessible by public transport and within easy access to employment and services.</p>	D.T.Z.
<p>We have no comments on these questions. Any option for population growth should consider the capacity of other factors, such as the environment, to meet such growth, for example, there should be planned infrastructure for sewerage disposal and adequate water supply should be in existence.</p>	Environment Agency
<p>The HBF believes a strategy that promotes regeneration in areas of need, whilst still encourages the more successful areas to thrive, would be a suitable option for the future development of Blaenau Gwent. If areas that are attractive to potential investment are allowed to grow and prosper, they can radiate benefits to other areas that require investment. Therefore, the HBF believes it is important to build on the success of areas that have the potential to draw further investment into Blaenau Gwent, as these areas can be the catalyst to successful regeneration throughout the County Borough.</p>	Home Builders Federation

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<p>Strategy outlined. However, if a brownfield site or a chance of making a better use of a problem site arises, as long as it doesn't affect the countryside, I feel there should be a voting system.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.3 Are there settlements or areas where future development should be controlled differently?</p>	
<p>No. Large settlement areas only help to separate communities. Due to the choice of market leveling for the type of housing offered drives a wedge through areas.</p>	<p>A.H.D Designs</p>
<p>Yes. Careful consideration should be given to the density of development in existing urban areas where there is already considerable pressure on local infrastructure and limited scope to improve this. In some instances alternative use of existing developed areas should be considered.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Yes. Appropriate development and control on infringement on town's green fringes. As well as this growth should take into consideration National and Regional focus, e.g. those outlined in the Spatial Plan and Heads of the Valley Strategies.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>No comments expect that consideration should take account of services and connection to these services as outlined in 2.2 above.</p>	<p>C.C.W.</p>
<p>Yes. CPRW's somewhat oblique response is to suggest that housing development in 'third category' settlements, as described on page 11, final paragraph, will only be environmentally sustainable if it caters for the needs of local people who are currently living in shared accommodation. Additional commuting by car to access services must be avoided.</p>	<p>C.P.R.W</p>
<p>Some settlements are too small to accommodate growth in a successful and sustainable way. Key towns such as Blaina should be the focus for growth. Urban extensions to such settlements on greenfield land is likely to be more sustainable than brownfield land development in many cases. This is due to the proximity to services and infrastructure and the need to retain these services. This is critical for the regeneration of key settlements and the realisation of the settlement strategy. Not all development should be focused at the Ebbw Fawr Valley. The railway line is just one facet of sustainability and it is important that the whole of the County Borough benefits and is regenerated. It is important that existing settlements are improved in order to provide a better quality of life for existing residents.</p>	<p>D.T.Z.</p>
<p>Overall flooding/ Flood Risk has been identified as a strategic environmental issue in Blaenau Gwent. A precautionary framework should be used when considering</p>	<p>Environment Agency</p>

the siting of development; if there is potential environmental risk in a certain area, development should not be considered until it can be demonstrated that the environmental risk has been fully assessed and the consequences of that risk can be managed. For example, when there may be a threat of flooding, lack of full certainty should not be used as a reason for allowing development to go ahead. Rather, this lack of certainty should prompt relocation of development away from the area of risk, or investigation into the risks and whether they can be managed.

In terms of flood risk, the LDP and SEA should explain the positive steps, which have been taken to promote development in Zones A and B of the development advice maps. To this end the Local Authority should consider undertaking a broad level assessment of the consequences of flooding.

In addition, the LPA should, apply the justification test contained with TAN15, when selecting any strategic sites and site allocation located Zone C. We would also wish to be involved in discussions and agree the scope of such assessments with your Authority.

We would encourage new development to be situated away from areas affected by flooding. In instances where this is not possible, please note that any proposed development areas that are identified to be within areas affected by flooding i.e. our own flood maps and the zones of the development advice maps (dam) referred to under TAN 15 Development and Flood Risk - July 2004, may need to be supported by Flood Consequences Assessments (FCAs) that show that the risks and consequences of flooding can be adequately managed.

For small-scale extensions to existing properties that cannot be located outside the flood plain, we recommend we advise that the developer should be made aware of the potential flood risks, and be advised to install flood-proofing measures as part of the development.

We would encourage development to be concentrated in former brownfield sites (where available) along the new rail route up the Ebbw Fawr valley. Land contamination matters must be adequately addressed, in that land affected by

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<p>contamination should be remediated so that it is suitable for use and poses no threat to controlled waters.</p> <p>When development is proposed adjacent to watercourses, we would also encourage the retention of continuous buffer zones along the watercourse, in order to maintain a wildlife corridor.</p> <p>Future development should be directed to areas where there is planned sewage infrastructure. Planning Policy Wales advises that Local Planning Authorities should consider the capacity of existing and potential infrastructure (foul water) and phasing of development. We would be concerned for potential adverse environmental impacts where there are no planned improvements. The sewerage undertaker should be consulted with regard to the adequacy of existing sewerage infrastructure. This should ensure that there is adequate capacity in the sewer in order to cope with increased flows from increased development. This should be carried out in conjunction with sewerage providers for the area.</p> <p>In controlling surface water runoff from the development it is essential that the development proposals include suitable provision to ensure satisfactory long-term maintenance of the system/structure installed.</p> <p>The Environment Agency's Catchment Abstraction Management Strategies (CAMS) sets out how we will manage water resources in catchments and provides information about how we will manage existing abstraction licences and the availability of water for further abstraction. Meanwhile, the LPA should consider the availability of water resources availability when expanding development in any particular area.</p>	
<p>The HBF believes a strategy that promotes regeneration in areas of need, whilst still encourages the more successful areas to thrive, would be a suitable option for the future development of Blaenau Gwent. If areas that are attractive to potential investment are allowed to grow and prosper, they can radiate benefits to other areas that require investment. Therefore, the HBF believes it is important to build on the success of areas that have the potential to draw further investment into Blaenau Gwent, as these areas can be the catalyst to successful regeneration</p>	<p>Home Builders Federation</p>

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throughout the County Borough.	
Yes. Obvious reason would be to access and nuisance situations but also if a town or village can gain with jobs or low, reasonable cost housing I think these should be taken into account.	Rhyd Developments Ltd.
2.4 Are there settlements or areas where future development should be encouraged and if so, explain where and why?	
Yes. All brownfield sites should be redeveloped irrespective of their location. Selective Greenfield sites should be released for locals to develop.	A.H.D Designs
Yes. In some instances, changes to local population through changes to the housing stock can have a negative impact on local service and economic activity. Some schools become non-viable because the population has moved elsewhere. Development should be considered in the context of sustaining community areas.	B.G.C.B.C. (Assistant Director of Education)
Should take into consideration National and Regional focus, e.g. those outlined in the Spatial Plan and Heads of the Valley Strategies	B.G.C.B.C. (Research Officer)
No comments expect that consideration should take account of services and connection to these services as outlined in 2.2 above.	C.C.W.
Strategy outlined. The current Settlement Strategy is a sound one – all but the smallest settlements will benefit from the provision of new dwellings. It is also sustainable. While a good case can be made for large-scale housing provision on the Steelworks site at Ebbw Vale as a component of mixed-use development, this must not be allowed to override the Settlement Strategy principle.	C.P.R.W
Yes. We consider that development in and adjoining Blaina should be encouraged. Blaina is a key settlement, yet it is clear that shops and businesses are struggling to survive. Housing growth is vital to encourage the organic economic growth of Blaina and, in turn, stimulate the social and physical regeneration of Blaina. Population increase would support local bus services, education and health provision. Housing at Blaina would accord with the Wales Spatial Plan and the major themes of the Draft Regeneration Strategy of ‘unlocking the potential of our people, unlocking the potential of our places and building a confident future’.	D.T.Z.
See 2.3 for comments	Environment Agency
The HBF believes a strategy that promotes regeneration in areas of need, whilst	Home Builders Federation

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<p>still encourages the more successful areas to thrive, would be a suitable option for the future development of Blaenau Gwent. If areas that are attractive to potential investment are allowed to grow and prosper, they can radiate benefits to other areas that require investment. Therefore, the HBF believes it is important to build on the success of areas that have the potential to draw further investment into Blaenau Gwent, as these areas can be the catalyst to successful regeneration throughout the County Borough.</p>	
<p>The focus of future development should be on reducing inequalities. Priority should therefore be given to settlements or areas where the underlying health determinants are currently unfavourable. These areas are characterised by, for example:</p> <ul style="list-style-type: none"> • high levels of unemployment • poor housing • isolation • poor access to services and amenities (e.g. food, leisure, healthcare) • high levels of crime 	<p>NPHS</p>
<p>Growth within already developed areas is progress. Nobody should hold back a developing town where jobs could be created just because its policy.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.5 In view of the preference for the development of Brownfield sites before Greenfield sites should the Plan look at identifying all Brownfield sites regardless of their location and the needs of the various communities?</p>	
<p>Yes. All brownfield sites should be redeveloped irrespective of their location. Selective Greenfield sites should be released for locals to develop.</p>	<p>A.H.D Designs</p>
<p>No. Development should be related to local need. It would seem preferable to develop the LDP around the need to plan for specific communities or community groupings. Of course there will also be Authority-made aspirations to be met.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>No. Are all BG's Brownfield sites in areas appropriate for housing and other facilities? Full investigation of their potential should be investigated before committing them to redevelopment, particularly for housing. This should however, not be done at the expense of Greenfield Sites.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>No. Overall emphasis should be on development of brown field land. However, some brown field sites will have developed ecological interests. Therefore, there may be some locations that it would be more appropriate to develop on green field</p>	<p>C.C.W.</p>

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<p>site of low value in preference to a brown field site of high value.</p>	
<p>Yes. On a forward looking basis, it could be useful to identify 'all Brownfield sites' for (regularly reviewed) safeguarding for housing development, even if the need for them during the lifetime of the LDP is not currently apparent.</p>	<p>C.P.R.W</p>
<p>No. Brownfield status is just one aspect of planning policy and the wider sustainability issue. Whilst it should be preferable to develop brownfield sites first, it is important to recognise that some greenfield sites may perform more highly in terms of sustainable and development, and therefore be sequentially preferable. Furthermore, greenfield sites may also better help to achieve aims of the LDP such as regeneration, strong service centres, settlement hierarchy and community facility improvement. Planning Policy Wales places emphasis on promoting resource efficient settlement patterns and locating development so as to minimise the demand for travel for example.</p>	<p>D.T.Z.</p>
<p>We suggest that the plan could be integrated with the Local Authority's Part IIa (EPA 1990) inspection strategy. The inspection strategy will give an indication of where many brownfield sites within the Local Authority have been prioritised in relation to potential land contamination. This will indicate land contamination issues that will need to be dealt with through the planning system. Additionally it will inform which brownfield sites are near the top of the prioritisation list and are likely to be dealt with through the Part IIa Contaminated Land regime in the future i.e. brownfield sites which are potentially highly contaminated and are located in an area not ideal for redevelopment can therefore be dealt with through the Part IIa regime.</p> <p>Concentrating development on brownfield sites can help to clean up the site through appropriate remediation, make the best use of existing services such as transport and waste management. Some brownfield land has become important wildlife habitat and a valuable part of public green space. Brownfield redevelopment must be balanced with wider amenity interests.</p>	<p>Environment Agency</p>
<p>The HBF disagrees that the Plan should identify all 'brownfield' sites regardless of their location and needs of the various communities. This policy approach could generate many problems. I.E.</p> <ul style="list-style-type: none"> • There may be a lack of availability of 'brownfield' sites in areas that require 	<p>Home Builders Federation</p>

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<p>more development than those with an oversupply.</p> <ul style="list-style-type: none"> • The fact that the site is labelled ‘brownfield’ does not automatically make it a more sustainable place for development over a ‘greenfield’ site. Many ‘brownfield’ sites may be rich with species that are worthy of protection over simple areas of grassland, therefore assumptions should not be made without proper investigation. • The priorities of the neighbourhood must be taken into account when assessing land that is suitable for development. It may be the case that an area of ‘greenfield’ land may be more suitable for development in some areas than ‘brownfield’ sites. In addition, the ability to develop a ‘greenfield’ site, may provide more options for regeneration and improvements than if the development was restricted to a ‘brownfield’ site merely to satisfy LDP Policy. <p>In light of the above, the HBF believes that a policy that allocates all ‘brownfield’ land regardless of its characteristics, or the area within which it is situated, is unnecessary and restrictive. It also removes the option to explore the most appropriate development for the area and has the potential to ignore the needs of communities before they have had the chance to be assessed.</p>	
<p>Brownfield sites should not be developed regardless of location and the needs of local communities. As mentioned in Question 1.1 a balance needs to be struck between competing social, economic and environmental objectives. This can be achieved through on-going engagement and consultation with the local community about their needs and aspirations. Careful consideration should also be given to the use of land adjacent to housing developments to ensure that residents have a clean, safe and pleasant environment in which to live and are not adversely affected, for example, by noise or environmental pollution.</p> <p>There is strong evidence for the positive impact of pleasant green spaces on mental health, especially where these spaces can be easily accessed and utilised by residents (Mind, 2007. See also Question 4.1 – 4.5). Consideration should be given as to how housing and town centre developments can be integrated with the natural environment and green spaces (e.g. integrating parks and gardens into the layout of the development). A Green Space Audit has recently been completed in the County Borough.</p>	<p>NPHS</p>

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<p>Given that empty and derelict retail and residential properties have a negative impact on the well-being of the local population as well as the image of the area, a solution may be to utilise these properties as residential dwellings.</p>	
<p>Yes. All brownfield sites should be exhausted especially after the loss of heavy industry, surely this would be a bonus.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.6 Should the Plan look at increasing housing densities generally or cater for a range of densities according to the location of the site in relation to public transport?</p>	
<p>Cater for a range of densities. Small development sites work from every aspect (20 max). They are more respectable, they generate good relationships, they are safer & better managed.</p>	<p>A.H.D Designs</p>
<p>Cater for a range of densities. Planning for maximum densities will work against other objectives, particularly sustainability and 'quality of life issues'. Excessive pressure may be placed on local infrastructure. Smaller sites in existing urban areas should be used for lower density housing such as extra care or properties at the higher end of the housing market.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Cater for a range of densities. A changing population dynamic warrants a move away from a historical family based community approach, and would also go some way to helping realise population increase targets. Even so, any change in the housing options should be controlled appropriately to keep valley character, BUT also promoted effectively to achieve a forward thinking direction.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Cater for a range of densities. Catering for a range of densities would allow for incorporation of undeveloped land that would contribute to providing natural green space for residents and generally improving the environment in which to live. (Please refer to CCW's Natural Green Space Toolkit). In addition, this approach would help to identify and protect habitats and contribute to providing ecological connectivity in the wider landscape (see comments under Q6.1)</p>	<p>C.C.W.</p>
<p>Cater for a range of densities. CPRW accepts that there is a case to be made for varying housing densities to cater for a range of demands. The Planning Policy Wales policy referred to in the final sentence in the text above the question should be firmly adhered to. The charity is of the incidental opinion that <u>all</u> new housing 'estates', regardless of building density, should be accessed by a public transport system that is sufficiently</p>	<p>C.P.R.W</p>

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convenient to lead to reduction in travel by private car.	
Increase densities generally. Raising densities is in line with national planning policy and sustainable development objectives. However, densities should only be raised significantly in locations that are appropriate, such as at transport interchanges, town centres and key settlements.	D.T.Z.
The decision about housing density should be based on the accessibility of public transport and aim to attenuate the outward migration of the working-age population.	NPHS
Cater for a range of densities. However difficult high density housing in the affordable range usually causes different social problems. I feel mixed housing is now probably more favoured on a lower density.	Rhyd Developments Ltd.
2.7 How can the Plan cater for the Housing Needs of the ageing population?	
By identifying specific sites in existing communities for extra-care accommodation and smaller properties. This should also place less pressure on the local highways network. This should also help release larger properties for larger families.	B.G.C.B.C. (Assistant Director of Education)
Ensure the Older People Strategy is incorporated effectively, and need mapped out.	B.G.C.B.C. (Research Officer)
(1) One way of catering for 'the Housing Needs of the ageing population' is to update sub-standard dwellings (publicly or privately owned) that are occupied by elderly people, so that they are enabled to remain comfortably in these homes if they choose to do so. (2) Where needed, and an appropriate site is available, small sheltered units should be developed. The ideal location is near to mainstream housing occupied by people from all age groups, thus allowing the sheltered accommodation residents to see themselves (and be perceived by others) as being part of the community. (3) New Care Homes, if required should be situated where visitors can readily access them by bus, walking or cycling.	C.P.R.W
Provide housing in close proximity to existing centres, which provide day-to-day shopping needs and healthcare for example. Blaina is such a location where the elderly could take advantage of the facilities on the High Street. The Southlands site is within 10-minute walking distance of the High Street.	D.T.Z.
Requirement for 'lifetime homes' design standards in building all new housing stock could have many benefits for young families and disabled people, as well as older people. This plan needs to support the Living Independently in Blaenau Gwent in the 21st	NPHS

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<p>Century strategy. Its development should also support the Strategy for Older People which aims to:</p> <ul style="list-style-type: none"> • Improve access to life long learning opportunities for older people • Assist older people to remain / return to active employment for as long as they wish • Enable older people to live independently in a suitable and safe environment (including the use of assistive technology) • Prevent isolation and ensure that older people maintain links with the community • Create strong social networks for older people <p>The Older People's Strategy Group has established a number of mechanisms for engagement, involvement and participation of older people. These would enable on-going consultation on the LDP to establish the needs of the ageing population in Blaenau Gwent.</p>	
<p>This is a must. Instead of land being sold off to big developers I feel that the same land price could be achieved to be offered for secure village type fully secured and manned residential units.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.8 How can the Plan assist in the delivery of high quality schemes that are sustainable?</p>	
<p>The Development guide should be to encourage the competitiveness to improve status. All individuals have the need to improve. Affordable in the traditional valley housing freed up by people wanting to improve & move up the housing ladder.</p>	<p>A.H.D Designs</p>
<p>- sustainable communities should be encouraged - the density of development needs to be reasonably limited - biodiversity issues need to be linked to development - a good quality local environment should add to property values. Ensure appropriate open space and green corridors where possible.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Strong Planning Requirements</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Ensuring that development is in the right location, close to services and with integrated transport links to those services. Location of new housing should take into account the surrounding landscape and be in keeping with the landscape in terms of location and design. The information gathered through the Landmap process should help to identify important landscape character areas within the County Borough and this information should be used to help deliver high quality schemes.</p>	<p>C.C.W.</p>

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<p>In addition, the sustainability of house build in terms of energy efficiency and use of renewable energy sources should be incorporated (CCW publication, 'Building in Green' refers).</p>	
<p>The relevant Plan policies and supporting text in respect of the 'delivery of high quality designed schemes' must be drawn up on the basis of the latest guidance on the subject from all sources.</p> <p>Sustainability must be factored into design from the earliest drawing board stage, taking into account such matters as building orientation, economy of energy and water use, penetration by public transport and safety for walkers and cyclists.</p>	C.P.R.W
<p>The density of schemes should be raised to make more efficient use of land. The plan should also promote development in and adjoining the main settlements, such as Blaina, to ensure that they contribute to creating sustainable patterns of development and make best use of existing facilities, services and infrastructure. The plan could also encourage the use of sustainable building techniques.</p>	D.T.Z.
<p>We welcome policies and SPGs/ topic papers that promote the following:</p> <p>New neighbourhoods should be designed to encourage kerbside recycling and collection. Community composting schemes and the necessary waste handling facilities should be developed as part of the essential infrastructure of new neighbourhoods.</p> <p>We would welcome policies that promote energy efficiency measures, such as energy efficient appliances, passive solar gain, and natural ventilation.</p> <p>The Plans should consider the life cycle of buildings. Many buildings will be adapted for a different use later on in their life. Although it is not possible to anticipate what this will be for, it is more practical to renew and adapt buildings if they were originally built of good materials and to an appropriate quality for their anticipated lifetime. Quality is a benefit to the built environment. Building to a high quality will reduce wasting resources.</p> <p>We welcome new policies that promote sustainable water management techniques and technologies. These include:</p>	Environment Agency

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<ul style="list-style-type: none"> • water-efficient appliances and fittings, such as ‘A-rated’ washing machines, low-flow taps and showers and low or dual-flush toilets; • leak-detection systems for major supplies; • rainwater harvesting and re-use systems; • drought-resistant landscaping; • grey water recycling. <p>We would welcome policies that encouraged Sustainable Urban Drainage techniques (SUDS) to ensure that surface water run-off is controlled as near to its source as possible. This approach involves using a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, ponds and wetlands to reduce flood risk by attenuating the rate and quantity of surface water run-off from a site. This approach can also offer other benefits in terms of promoting groundwater recharge, water quality improvement and amenity enhancements. Approved Document Part H of the Building Regulations 2000 sets out a hierarchy for surface water disposal, which encourages a SUDS approach. Further information on SUDS can be found in Appendix 4 of TAN15 and in the CIRIA C522 document Sustainable Urban Drainage Systems-design manual for England and Wales and the Interim Code of Practice for Sustainable Drainage Systems. The Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SUDS. The Interim Code of Practice is available on both our web site at: www.environment-agency.gov.uk and CIRIA's web site at www.ciria.org.uk.</p>	
<p>Obviously infrastructure and now with the new Heads of the Valleys promotion is priority, including tourism.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.9 Should the threshold of 30 be reduced to ensure that the affordable housing needs of the population are met?</p>	
<p>Yes. 20 threshold in one location but more separate locations are necessary. Developers should also include expansion space within each property.</p>	<p>A.H.D Designs</p>
<p>No. Setting prescriptive guidelines may not be appropriate for specific areas. It may be better to maintain some flexibility so that local circumstances can be assessed. High density can act against sustainability and ‘quality of life’.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Yes. Affordability fluctuates, and will do so in the future if BG’s population dynamics change. More migration into the area would affect the affordability, and consideration needs to be given to the affect in-migration would have on</p>	<p>B.G.C.B.C. (Research Officer)</p>

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<p>affordability and how this effects the significant majority of our population that already live here.</p>	
<p>Yes. Though CPRW has answered YES to this question, it does so with reservations, bearing in mind the arguments as to differing housing densities given in the text above Question 2.6 Where the need for affordable dwellings arises, and viability is not an issue, 'the threshold of 30 (should) be reduced', notwithstanding the desirability of providing choice of house types.</p>	C.P.R.W
<p>No. Maintaining the threshold at 30 would help to deliver growth that is necessary to sustain and improve the County Borough. It is important to recognise that encouraging housing growth would help to address affordability and provide the population necessary to provide a labour pool for business and create a critical population mass to sustain services.</p>	D.T.Z.
<p>Question 2.9/10 The HBF believes that more work needs to be undertaken in order to ascertain a suitable affordable housing threshold and target for the LDP. As described above, the Federation believes that the Blaenau Gwent Local Housing Market Assessment has not been undertaken in line with guidance from the Welsh Assembly Government and therefore any affordable housing figure derived from it should not be included within the LDP.</p>	Home Builders Federation
<p><i>Question 2.9 and 2.10</i> The plan should maximise the percentage of affordable housing to stem the outward migration. Evidence suggests that stress and anxiety can be caused by excessive debt, mortgage arrears and repossessions in owner occupied accommodation (BMA, 2003). The level of affordable housing should therefore be commensurate with the plans for economic development and associated household income. In order to stem outward migration and to close the inequalities gap, consideration should also be given to a mechanism for protecting affordable housing stock for existing local residents. Child poverty also needs to be considered in relation to affordable housing. Children should have a suitable home environment that provides security stability, space to play and do homework. Children living in temporary accommodation may be affected by developmental delay and psychological problems.</p>	NPHS
<p>No.</p>	Rhyd Developments Ltd.

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<p>A small developer would be pushed out and these are the people that employ locals.</p>	
<p>2.10 What percentage of a housing site should be affordable?</p>	
<p>Other. Percentages should be based on community-based assessments to ensure a balanced housing stock. The balance of housing will significantly influence the viability (or otherwise) of local communities.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Dependent on viability. All housing should aim to be affordable depending on situation. BG Housing is affordable to people outside the area, and will stimulate migration. However, this has a negative effect on those already living as house prices rise. Therefore, when allocating affordable housing consideration should be given to invoking a 'local clause' to ensure affordable housing is available to BG residents in the first instance. However, consideration would need to be given to the legality of this approach.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Dependent on viability. The choice of 'Dependent on viability' is based upon a realistic approach. Level of need for affordable homes in a given area also has a part to play (see 2nd comment upon Question 2.9 above). Avoidance of a set figure allows for flexibility in respect of adaptation to changed circumstances.</p>	<p>C.P.R.W</p>
<p>Other/depend upon viability Viability should take into account the merits of the development, such as its location. For example housing growth should be promoted in sustainable locations such as the main settlements and it may be appropriate to provide flexibility in any LDP policy to allow lower provision to ensure that the wider challenges and objectives of the LDP are realised. Increasing the overall provision of housing growth (i.e. 250 per annum or more) can also increase the total number of affordable houses being built.</p>	<p>D.T.Z.</p>
<p>Other. Depends from site to site, if one small site is looking to attract directors of blue chip companies obviously a mix here would defeat the object.</p>	<p>Rhyd Developments Ltd.</p>
<p>2.11 What should the approach of the new LDP be in relation to the provision of new facilities?</p>	
<p>Maintaining the existing to the quality & standards expected.</p>	<p>A.H.D Designs</p>

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<p>Opportunities should be maximised to associate these with existing or planned facilities. Welsh Assembly Government promotes schools as a focus for community engagement and support. This already happens particularly in relation to leisure and recreation.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Changes in population distribution would need to be mapped out to identify its effects on transport, education provision etc. Large-scale housing development in isolation would lead to pressures on the transport infrastructure, as the population lives their life's, e.g. work and school traffic etc.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>All new developments should be assessed against the provision of facilities in the local area and if deemed inadequate new facilities should be provided as part of the scheme. This should include consideration of access to natural green space and access links including footpaths to the wider countryside.</p>	<p>C.C.W.</p>
<p>The 'new LDP' should adopt a broadly based approach to social facilities provision. Each section of the community should be catered for in line with its reasonable requirements, age groups projections being used to inform decision-making.</p>	<p>C.P.R.W</p>
<p>Community facilities should be provided in locations close to a critical mass of population. Therefore, facilities would best be provided at the main settlements. Furthermore, in order to make the most efficient use of facilities, future housing growth should be located at key settlements. For example, the primary school at Blaina has school places available and other facilities such as the library need to be sustained.</p>	<p>D.T.Z.</p>
<p>See 2.3 for comments</p>	<p>Environment Agency</p>
<p>This plan needs to take account of the Clinical Futures programme, which aims to, modernised and re-shape the delivery of healthcare services across Gwent. In addition to the development of Ysbyty Aneurin Bevan the LHB are working in partnership with Blaenau Gwent County Borough Council and Gwent Healthcare NHS Trust to improve "out of hospital" services; set out the strategic vision – Blaenau Gwent 2010. The health and social care needs of an ageing population is one of the factors that has stimulated this move to integrate the provision of community services (see also Question 2.7). Sites are still being identified for the planned four Primary Care Resource Center 'hubs', which will contain not just GPs, but a wide range of other primary health and social care services. A key component of the vision for the Heads of the Valleys Strategy is the creation of "culturally rich, dynamic network of vibrant, safer communities". Any new</p>	<p>NPHS</p>

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<p>developments should therefore give priority to facilities that allow cultural, leisure and religious activity. Greater social participation and networks is a key component of social capital, which contributes to improved health and wellbeing within the population.</p>	
<p>Large new sites should contribute per roof.</p>	<p>Rhyd Developments Ltd.</p>
<p><u>EMPLOYMENT</u></p>	
<p>3.1 Should we be looking to reallocate employment land identified in the UDP</p>	
<p>? Yes as current plan</p>	<p>A.H.D Designs</p>
<p>Yes. The extent of employment land needs to be related to the broad vision for the Authority. If the aim is to encourage people to move to an area which has a quality environment and facilities to support families e.g. education, leisure, recreation, land allocations should support this. A large manufacturing base may be harder to sustain (also applies to the need for housing land).</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>No. Although, on paper, BG appears to have 'enough' employment land allocated for future use (particularly looking at figures being worked to by SEWEF of others), the truth is very much the opposite. Large areas of seemingly available land are host to a variety of issues & problems, including aspects of a political, geological, geotechnical & infrastructural nature (amongst others). Whilst we need to earmark certain sites for appropriate future needs, in correlation to forecast demands for warehousing, offices etc, there is also a need to ensure that we are able to meet the requirements of manufacturing – based inward investors & also to be able to service the demand for expansion in any of our existing BG companies. We are struggling to do this at present! Rather than reallocate employment land, we actually need to identify new sites, that are appropriate & not suffering from constraints.</p>	<p>B.G.C.B.C. (Business Environment Local Coordinator)</p>
<p>Yes. More focus on the service industry should be given. Our historical dependence on primary and manufacturing industries has meant that when national pressures and related closures occur, BG suffers due to an overdependence of one type of industrial base. As a consequence, we should have long-term targets to diversify our employment base.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Yes. CCW feel that it may be appropriate to consider whether some of the existing</p>	<p>C.C.W.</p>

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	allocations should be used for other uses.	
	Yes. CPRW cannot give a direct answer to this question. It is however, of the view that given a sufficiency of employment land within the county borough, it seems reasonable to allocate surpluses for other purposes for which there is demand and the location is suitable in terms of its changed use.	C.P.R.W
	No. Employment growth and economic growth are critical to the regeneration of Blaenau Gwent. The LDP should focus on how to deliver employment growth and unlock the potential that exists.	D.T.Z.
	<p><i>Question 3.1 – 3.3</i></p> <p>The LDP should support the objectives with the Blaenau Gwent Regeneration Strategy and Heads of the Valleys Strategy. Changing patterns of life, work and leisure have a significant impact on health. Work and leisure should be a source of health for people and working conditions should (in so far as is possible) be safe, stimulating, satisfying and enjoyable. The transport infrastructure surrounding employment land should encourage walking and cycling ('active commuting') to and from work. Where new businesses are developed there should also be adequate public transport links that correspond as far as is possible with working hours. This may involve some negotiation between business developers and transportation companies to re-schedule or re-route existing services.</p> <p>Work is an increasingly sedentary occupation for many people – sitting at a desk or computer for much of the time. This makes opportunities for active travel – walking or cycling to work – increasingly important for health improvement, particularly as many of the traditional jobs in the County Borough involved a high level of physical activity. Active travel is one of the best ways to improve physical activity, as it is automatically undertaken as part of everyday life.</p>	NPHS
	No. Any chance of new employment should override the UDP.	
3.2 What type of employment land is needed?		
	Small units with land space to develop with business groups.	A.H.D Designs
	Depends upon the broad development of the Broad Vision – are we going to move away from a focus on manufacturing towards the leisure sector, leisure, tourism and 'white collar' activities?	B.G.C.B.C. (Assistant Director of Education)
	As eluded to within the previous section, we need to service two broad types of development, but need to identify areas accordingly. Sites that do not suffer from	B.G.C.B.C. (Business Environment Local Coordinator)

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<p>the constraints described above need to be identified, ideally with good logistical linkages. This will not be easy within BG – as a very small local authority, very few areas lend themselves to this in an obvious manner; survey work, to support this vital economic aspect of the LDP, should be carried out, to identify & evaluate our best options for escaping this quandary. Given the timescales involved with adopting land for future employment use within the forthcoming LDP, action is <u>urgently needed</u>, if we are to be protected.</p>	
<p>Our focus should be on diversification of our employment, and strong focus should be given to our service industry opportunities, such office based employment, tourism.</p> <p>Even so, this needs to be a realistic transition, and we should continue to support and maximise opportunity for the employment base we currently have.</p>	B.G.C.B.C. (Research Officer)
<p>If the accompanying text represents the factual situation, 'employment land' to accommodate businesses in the service sector would appear to be needed.</p>	C.P.R.W
<p>The LDP should ensure that suitable land is available for a range of employment types, and provide sufficient flexibility for change in employment patterns, industries and markets.</p>	D.T.Z.
<p>Overall flooding/ Flood Risk has been identified as a strategic environmental issue in Blaenau Gwent. A precautionary framework should be used when considering the siting of development; if there is potential environmental risk in a certain area, development should not be considered until it can be demonstrated that the environmental risk has been fully assessed and the consequences of that risk can be managed. For example, when there may be a threat of flooding, lack of full certainty should not be used as a reason for allowing development to go ahead. Rather, this lack of certainty should prompt relocation of development away from the area of risk, or investigation into the risks and whether they can be managed.</p> <p>In terms of flood risk, the LDP and SEA should explain the positive steps, which have been taken to promote development in Zones A and B of the development advice maps. To this end the Local Authority should consider undertaking a broad level assessment of the consequences of flooding.</p> <p>In addition, the LPA should, apply the justification test contained with TAN15, when</p>	Environment Agency

selecting any strategic sites and site allocation located Zone C. We would also wish to be involved in discussions and agree the scope of such assessments with your Authority.

We would encourage new development to be situated away from areas affected by flooding. In instances where this is not possible, please note that any proposed development areas that are identified to be within areas affected by flooding i.e. our own flood maps and the zones of the development advice maps (dam) referred to under TAN 15 Development and Flood Risk - July 2004, may need to be supported by Flood Consequences Assessments (FCAs) that show that the risks and consequences of flooding can be adequately managed.

For small-scale extensions to existing properties that cannot be located outside the flood plain, we recommend we advise that the developer should be made aware of the potential flood risks, and be advised to install flood-proofing measures as part of the development.

We would encourage development to be concentrated in former brownfield sites (where available) along the new rail route up the Ebbw Fawr valley. Land contamination matters must be adequately addressed, in that land affected by contamination should be remediated so that it is suitable for use and poses no threat to controlled waters.

When development is proposed adjacent to watercourses, we would also encourage the retention of continuous buffer zones along the watercourse, in order to maintain a wildlife corridor.

Future development should be directed to areas where there is planned sewage infrastructure. Planning Policy Wales advises that Local Planning Authorities should consider the capacity of existing and potential infrastructure (foul water) and phasing of development. We would be concerned for potential adverse environmental impacts where there are no planned improvements. The sewerage undertaker should be consulted with regard to the adequacy of existing sewerage infrastructure. This should ensure that there is adequate capacity in the sewer in

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<p>order to cope with increased flows from increased development. This should be carried out in conjunction with sewerage providers for the area.</p> <p>In controlling surface water runoff from the development it is essential that the development proposals include suitable provision to ensure satisfactory long-term maintenance of the system/structure installed.</p> <p>The Environment Agency's Catchment Abstraction Management Strategies (CAMS) sets out how we will manage water resources in catchments and provides information about how we will manage existing abstraction licences and the availability of water for further abstraction. Meanwhile, the LPA should consider the availability of water resources availability when expanding development in any particular area.</p>	
<p>Again supply and demand, i.e. if a large blue chip company needs space this should take priority.</p>	<p>Rhyd Developments Ltd.</p>
<p>3.3 Should existing employment sites continue to be retained for employment use with a presumption against alternative uses or should a more flexible approach be adopted?</p>	
<p>Existing use only. Retained not to lose identity.</p>	<p>A.H.D Designs</p>
<p>More flexible approach. It will depend on the development of the broad vision. It is desirable to maintain as much flexibility as possible to address emerging needs.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>More flexible approach</p> <p>In correlation to the previous question (and answer), some sites with BG do not, in their present state, lend themselves to typical industries development. It may be that by looking for more appropriate (currently non-allocated), employment sites, that a 'swap' of different areas might become evident as being a sensible way forward, in terms of their uses of potential users. Should no other sites (or not enough land mass), be identifiable for employment purposes & the demands to be fulfilled, then this flexibility would not be so beneficial – mechanisms for dealing with the constraints affecting the current employment allocations should instead be sought, although there is an obvious likelihood of significant financial implications</p>	<p>B.G.C.B.C. (Business Environment Local Coordinator)</p>

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with this approach, that will have to be fully & properly considered, to inform decision making & planning.	
More flexible approach. If appropriate.	B.G.C.B.C. (Research Officer)
More flexible approach. In certain situations it may be more appropriate to develop site for housing, recreation, tourism or conservation related use.	C.C.W.
More flexible approach. There is nothing to add to the selection of the 'More flexible approach' option regarding retention of employment sites for employment use.	C.P.R.W
Existing use only. Employment growth and economic growth are critical to the regeneration of Blaenau Gwent. The LDP should focus on how to deliver employment growth and unlock the potential that exists.	D.T.Z.
See 3.2 for comments	Environment Agency
More flexible approach. Again supply and demand, i.e. if a large blue chip company needs space this should take priority.	Rhyd Developments Ltd.
<u>TOWN CENTRES</u>	
Role and hierarchy of town centres	
4.1 What are the future roles and functions of the current retail centres in Blaenau Gwent?	
All town centres should be maintained. It is my view that pedestrian retail areas do not work for the retailer	A.H.D Designs
It doesn't seem that all our large towns can effectively sustain a viable retail sector (at least in the general sense). However, it may be possible to sustain viable specialist retail centres e.g. Blaenavon book town.	B.G.C.B.C. (Assistant Director of Education)
We should identify and promote a regional centre and ensure the infrastructure is planned to allow this.	B.G.C.B.C. (Research Officer)
CPRW sees it as desirable that 'retail centres' should be diversified, as appropriate, to include such service/social facilities such as libraries, health centres and leisure activity venues. 'Living over the shop' should be encouraged, in order to create an enlivening presence of local people during the evening.	C.P.R.W

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<p>Blaina is identified as one of 5 town centres in the County Borough. The town centre serves its population but is struggling, and it is therefore critical that the function and role of Blaina town centre is retained and strengthened. Housing growth at Blaina would generate a critical population mass that would help to sustain local services and shops.</p>	<p>D.T.Z.</p>
<p><i>Question 4.1 – 4.5</i></p> <p>Town centres should be a focus for community interaction and a source of civic pride. Safe and attractive town centres that provide a range of amenities (retail, arts, leisure) contribute to wellbeing and positive views of the local area. Siting interactive spaces, meeting places, weather shelters and places for people to congregate within the town centre are ways of creating attractive and community-based places that people want to visit. All this also contributes to increasing social capital, and hence mental health and wellbeing.</p> <p>Pedestrianised town centres that are supported by good public transport can reduce car use resulting in improved air quality, reduced risk of accidents and promoting active living. Well-maintained, accessible green spaces within town centres are important for well-being and can encourage people to be more active. Where green spaces are not sited directly in the town, they should be signposted so that people can find them easily. There is mounting evidence for the impact of green spaces on mental and physical health. Major studies have indicated that being near accessible green spaces can increase levels of physical activity (Giles-Corti & Donovan, 2003), and other studies show that regular contact with the natural environment enhances physical and mental well-being, no matter what the setting (e.g. open countryside, parks, gardens, allotments or trees) (Mind, 2007). Green spaces can provide an environment for people to relax and unwind, recharge their batteries and engage in social contact, as well as providing a space for physical activity such as walking or gardening. Studies have shown that the presence of green spaces reduces levels of stress in urban areas and shortens recovery times for post-operative hospital patients (Mind, 2007).</p> <p>Fear of crime is an important factor in reducing social capital, and again this is something that can be designed out (or into) to town centres.</p> <p>The design, layout and facilities (e.g. bicycle racks, public conveniences, wheelchair access, signage, parking, baby changing) should enable equal access to town centres for all ages and abilities. Specific consideration should be given to</p>	<p>NPHS</p>

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<p>the needs of older people, people with physical disabilities and visual/sensory impairments.</p> <p>Economies of scale allow food sold in supermarkets to be cheaper and to cover a wider range than that in smaller high street stores. Furthermore, there is a paradox in that a "healthy" basket of food has been found to cost more in disadvantaged areas than in affluent areas. The increasing tendency to out of town supermarkets has led to the creation of "food deserts" where cheap and varied food is only accessible to those who have private transport or are able to pay the costs of public transport, if this is available (Acheson, 1998). The Public Health Team has recently done some work on mapping food deserts in the County Borough, which may be useful here.</p> <p>Transient retail markets, including enterprises such as Farmers Markets, can bring healthier, and sometimes cheaper, food into town centres, and also create a more social atmosphere and encourage visitors.</p> <p>People on low income, and in particular women and older people, are less likely to be able to drive or have access to a car, and price is a significant determinant of their ability to utilise public transport. The cost of transport may add a considerable amount to the cost of food shopping. Thus access to a cheaper and wider range of food is most restricted for some of the groups who need it most. Policies should ensure that development of retail food outlets do not have an adverse effect on those most vulnerable to poor nutrition (Acheson, 1998).</p>	
<p>The town centre of any town can be regarded as the focal point of the locality, it provides the community with a commodity service centre and as a meeting place for social activities. Additionally the town centre should have an individual identity that distinguishes that town, in some unique way from that of its neighbours.</p> <p>This source of identity could be by way of illustration of the towns history and in so doing contribute to the education of future generations of the culture of the locality and the events that brought about its existence.</p> <p>Within Blaenau Gwent the separate identities could be identified according to the historic links to the town e.g. Abertillery and Llanhilleth –Coal mining, Engineering and Tin works Brynmawr – Boot making and Tram-roads development Ebbw Vale –Iron and Steel Nantyglo and Blaina – Chartism, Scotch Cattle, Brass band and Education. <i>Rev W.</i></p>	<p>Nantyglo and Blaina Town Council</p>

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<p><i>Roberts of Salem Chapel promoted education in this area and was the first Inspector of schools in Wales</i> Tredegar – National Health service, Bedwellty House and Tredegar Clock.</p>	
<p>Out of town stores are inevitable, we should cash in and give incentives for the big names perhaps to perimeter the town centres. A good modern leisure facility would bring in people.</p>	Rhyd Developments Ltd.
<p>4.2 Should we look to identify which towns have the most potential for retail?</p>	
<p>No. All towns have the same needs.</p>	A.H.D Designs
<p>Yes. The possibility of ‘specialist ‘ retail centres and ‘events’ centres could be explored e.g. markets linked to other activities. However, success or otherwise would be determined by market forces and the ability to attract ‘foot fall’.</p>	B.G.C.B.C. (Assistant Director of Education)
<p>The spatial plan would promote an Ebbw Vale focus. The other 4 centres should have plans for regeneration, and appropriate downscaling and consolidation on their functions.</p>	B.G.C.B.C. (Research Officer)
<p>Yes</p>	C.P.R.W
<p>Yes. The retail role of the 5 towns identified should be consolidated. These centres, such as Blaina, currently serve the population and should be retained and strengthened rather than dispersing development to other settlements. Furthermore, the wider benefits of consolidation to help promote physical, social and economic regeneration of these settlements should be recognised.</p>	D.T.Z.
<p>Blaenau Gwent has a population of just over 70,000, which is served by five towns and numerous out of town or edge of town shopping outlets. Members of the town council recognise that to maintain five equally vibrant towns within the borough is not a realistic proposition. Conversely, to concentrate on the three largest towns only, would be to neglect a duty of care to the smaller towns. The residents of the smaller towns such as Nantyglo and Blaina, are mostly elderly and live in areas of the greatest degree of deprivation. The Welsh Index of Deprivation informs that of the 100 most deprived wards in Wales Nantyglo is 28th, Llanhilleth 47th, Cwmtillery 89th and Blaina as 98th. The shopping centres of these communities justify a special consideration. Potential retail development of the town centres could be based on a variable scale</p>	Nantyglo and Blaina Town Council

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according to community population/need as illustrated below: Wide-ranging Development – in town centres that serve a population in excess of 15,000. Comprehensive Development – in town centres that serve a population of less than 15,000.	
No. Things change from year to year.	Rhyd Developments Ltd.
4.2 Should we look to reassess the retail hierarchy and retail boundaries of the town centres	
No. Keep and sustain the current.	A.H.D Designs
Yes. Possibly alternative use of the existing property stock needs to be considered and possible groupings of properties into multi-retail centres.	B.G.C.B.C. (Assistant Director of Education)
Yes. This should be considered for towns that are struggling.	B.G.C.B.C. (Research Officer)
Yes. It could be beneficial to change 'retail boundaries for the town centres', provided care is taken to avoid disturbance to out-of-centre residents. Boundary changes might lead to more town centre shops and other facilities being readily accessible to users who walk or cycle.	C.P.R.W
Yes. The Council should review the success of past policies and consider the objectives for the next plan period. However, any assessment should take account of Planning Policy Wales which seeks further development to be located in existing settlements, make town centres more accessible, stimulate the viability and vitality of town centres, and provide a mix of uses in and around retail centres.	D.T.Z.
No.	Nantyglo and Blaina Town Council
No. Difficult with the areas already not taken.	Rhyd Developments Ltd.
4.3 How can we promote vibrant and vital town centres?	
Keep the current well maintained.	A.H.D Designs
They need to be developed as a safe and pleasant environment, particularly in the evenings. We need to move away from the sale of alcohol as the basis of social activity.	B.G.C.B.C. (Assistant Director of Education)

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<p>Opportunity to look for specialist town focus, however there is a need to be realistic, for example could anywhere in Blaenau Gwent offer similar facilities as Cowbridge or Hay on Wye do. However, we should look to ensure that our towns at least offer essential services.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>The 'environmental improvement and enhancement ', where necessary, mentioned in the text above the question is an extremely important means of increasing town centre vibrancy and vitality. It is hoped that town areas outside centres will also be targeted for environmental interventions. CPRW takes the opportunity to suggest that it would be useful for shop owners/occupiers to be actively encouraged to devise attractive displays. This may especially apply to retailers who occupy charity outlets.</p>	<p>C.P.R.W</p>
<p>Increase the population living in and close to the town centres Direct growth to the main settlements in accordance with the Settlement Strategy. Planning Policy Wales seeks to locate housing development close to, and promote access to, employment, shopping, education, health and community facilities.</p>	<p>D.T.Z.</p>
<p>Some towns may become important wildlife habitat and a valuable part of public green space. We would welcome policies that encourage town centres to include green pockets / corridors to soften urban landscapes and provide ecological links to suburb areas, particularly along river corridors. Such areas of green space can be used both by wildlife and people as movement corridors.</p>	<p>Environment Agency</p>
<p>To promote a vibrant shopping and town centre, a useful addition would be the development of an attraction to entice people into the town centre, this may take the form of a market, museum, a cinema or street entertainment. A further requirement for successful attraction would be to create a clean safe environment offering the elderly members of society a secure sense of well-being.</p>	<p>Nantyglo and Blaina Town Council</p>
<p>Employing one or two persons to keep on top of the state of each town, i.e. graffiti etc. before any promotion work can take place, and obviously networking.</p>	<p>Rhyd Developments Ltd.</p>
<p>4.3 Should the Plan encourage a mix of uses in the town centre?</p>	
<p>No. Keep them as they are.</p>	<p>A.H.D Designs</p>
<p>Yes. They need to provide a range of activities for local communities.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Yes.</p>	<p>B.G.C.B.C. (Research Officer)</p>

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<p>CPRW sees it as desirable that 'retail centres' should be diversified, as appropriate, to include such service/social facilities such as libraries, health centres and leisure activity venues.</p> <p>'Living over the shop' should be encouraged, in order to create an enlivening presence of local people during the evening.</p>	C.P.R.W
<p>Yes.</p> <p>Planning Policy Wales seeks to promote vibrancy and vitality in town centres. Providing a mix of uses is an important policy tool. Different uses can have different hours of use, thus ensuring that town centres remain a vibrant place. Providing a mix of uses can also contribute to creating sustainable patterns of growth by creating the opportunity for linked trips which can be made on foot or by public transport. However, the retail role of town centres should also be protected.</p>	D.T.Z.
<p>Yes.</p> <p>I think this has proved successful in other modern towns.</p>	Rhyd Developments Ltd.
<p>4.4 Does the plan need to identify additional retail space?</p>	
<p>No</p>	A.H.D Designs
<p>No.</p> <p>Doesn't seem to be justified by current demand. Probably best to look at existing town/village centres if there is a need.</p>	B.G.C.B.C. (Assistant Director of Education)
<p>No.</p> <p>Blaenau Gwent Towns are in desperate need of consolidation and stabilisation; some of the towns are set up to serve larger population. As well as this the retail dynamics have changed significantly in the last 20 years with a significant shift away from concentrated town centres. This is evident in every town in Blaenau Gwent, yet our towns still hold their historical boundaries and usage. In fact, through the development of new modern shopping centres, e.g. Ebbw Vale and Tredegar the problem have only been exaggerated.</p>	B.G.C.B.C. (Research Officer)
<p>Housing growth should be complimented by retail growth.</p> <p>However, we have not answered yes or no because assessing the need for additional retail floorspace should be informed by a comprehensive retail study. This is because identifying new retail floorspace in the plan is not necessarily required to improve the amount and quality of retail provision.</p> <p>We consider that existing opportunities (such as vacant units or the more efficient</p>	D.T.Z.

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<p>use of land) should be exploited before further development is allowed. For example, the main shopping street in Blaina is struggling, and the LDP should explore strategies for creating a thriving retail area. Such strategies could include encouraging high levels of housing growth and phasing further development until later in the plan period.</p>	
<p>No. Again, For Marks and Spencers or a large employer expressed an interest and it was good for the town, needs must.</p>	<p>Rhyd Developments Ltd.</p>
<p>4.5 Should the Plan aim to protect local shopping facilities?</p>	
<p>No. It should help to support these where it can, but success or otherwise will be determined by commercial factors.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Yes. The essential day-to-day functions within all towns should be protected</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Yes. Yes where these are viable to help reduce the need to travel to other centres outside the local neighbourhood.</p>	<p>CCW</p>
<p>Yes. For the reasons given in the associated text, the LDP should 'aim to protect local shopping facilities'. No CPRW explanation is needed. Shops should carry as large a range of goods as possible, and should be tidy and welcoming in appearance.</p>	<p>C.P.R.W</p>
<p>Yes. The Issues paper rightly recognises the role and importance of providing shopping areas close to populations and therefore to this end, housing should be located near to existing shopping areas.</p>	<p>D.T.Z.</p>
<p>Yes. Retail must be protected in town centres for the use of elderly and people without transport.</p>	<p>Rhyd Developments Ltd.</p>
<p><u>TRANSPORT</u></p>	
<p>5.1 What policies can be put in place to ensure that the new rail access and facilities proposed at the former steelworks site aid the regeneration of the wider area?</p>	
<p>Reduction in car use will never come about in the current situations. Previous</p>	<p>A.H.D Designs</p>

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<p>policies for multi-storey car parks in the valley towns do not work. The need is for one level & local too the retail and community areas – this is why the large stores work.</p>	
<p>Ideally a viable public transport link, but probably adequate parking facilities at the rail link is more likely to be achievable.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>Free buses fro the station to be provided for those on 'lower incomes' (if not all people). Although unlikely & cost ineffective, this would be desirable. If not free, then obviously, inclusion of the station as part of the Bus Stop route, providing regular access from all BG areas (even if at cost) would be essential.</p> <p>Incorporation of peripheral industrial estates upon the pick – up/ drop off route would be ideal and would serve a doubly beneficial purpose (if financially viable).</p>	<p>B.G.C.B.C. (Business Environment Local Coordinator)</p>
<p>Use the new rail station as a central hub and link other important site up to it. As the town is not directly linked it is key that infrastructure is put in place to maximise the opportunity e.g. Park and Ride.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>Policies to ensure integrated transport options including bus, cycleway and footpath links to stations. Provision of a park and ride service?</p>	<p>CCW</p>
<p>In order for 'the new rail access and facilities provided at the former steelworks site aid the regeneration of the wider area', complementary bus services, where they are currently poor or non-existent, will need to be put into place.</p>	<p>C.P.R.W</p>
<p>We support the Councils recognition that the LDP should facilitate the dispersion of benefits arising from the redevelopment of the steel works site across the wider area. Public transport routes, especially buses, should be linked to the railway station. The LDP can make a positive contribution to the usage and retention of public transport by locating housing development close to public transport routes, the main road network and the key settlements.</p>	<p>D.T.Z.</p>
<p>We would seek to ensure that any new rail access and facilities provided at the former steelworks site are designed and built to minimise harm to the environment. In considering their location and means of construction we would request that pollution to controlled waters should be minimised. If the proposed site is affected by contamination, it should be remediated. Any risks and consequences of flooding should be managed and biodiversity interests should be protected.</p>	<p>Environment Agency</p>
<p>Park and ride and free transport to the train station.</p>	<p>Rhyd Developments Ltd.</p>

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5.2 Are there specific measures, which could be taken to encourage the use of a range of different forms of transport?		
No.		A.H.D Designs
Yes. A contentious possibility would be to reduce provision for cars, but this would need to be linked to considerable improvements to existing public transport.		B.G.C.B.C. (Assistant Director of Education)
Adoption of bio-fuels for all council vehicles & public transport (to include private taxi's, if at all possible), rather than continued reliance upon the standard range of fossil fuels.		B.G.C.B.C. (Business Environment Local Coordinator)
Yes. Speed Awareness Signs, as opposed to Restrictive Calming Measure. Promotion cycle track and appropriate storage.		B.G.C.B.C. (Research Officer)
Yes. Measures should be aimed at reducing the need to travel by private car, by locating development near other land uses to encourage multi purpose trips and where there is good access by walking and cycling. There should be provision of high quality public transport, necessary infrastructure improvements and traffic management measures. Promotion of walking and cycling for shorter trips. Cycling routes should utilise off-road routes as far as possible to help encourage use.		CCW
(1) Education of the public, through climate change warnings, encouraging them to reduce their travel, especially by car. (2) Improving the public transport system, ensuring that all residents have access to at least basic services without being obliged to travel them by car. (3) Encouraging workplace car-share and cycle-hire schemes. (4) Where appropriate, promoting bus provision (possibly using mini-buses) for commuters to larger industrial estates. CPRW recognises that three of the four suggested actions are outside the direct scope of the land-use based LDP.		C.P.R.W
Yes. Locate housing growth at key settlements.		D.T.Z.

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<p>Areas that currently benefit from public transport and good road access can reduce the number and distance of car journeys. Directing growth to areas close to services and infrastructure can promote walking and cycling trips.</p>	
<p>The Welsh Assembly launched its national Walking and Cycling Strategy in December 2003. Specific measures to promote active travel should include safe routes to stations (bus and rail), schools and workplaces. The location of cycle and footpaths should make active travel the most convenient option for local residents and link key amenities (e.g. shops, surgery, schools). These routes should not be situated adjacent to the main carriageways, but should provide safe and well-maintained short cuts to local facilities and meeting places. Road traffic accidents are a major cause of injuries among residents in Blaenau Gwent. Epidemiological information regarding the incidence of accidents in particular communities can provide a focus for investment in traffic calming measures. Vehicle use and congestion can contribute to worsening air quality and climate change.</p>	NPHS
<p>Yes. Park and ride and free transport to the train station. Free parking, also cycle tracks with secure parking.</p>	Rhyd Developments Ltd.
<p>5.3 Are there specific road, rail or other infrastructure improvements that are required?</p>	
<p>No.</p>	A.H.D Designs
<p>Yes. A return to an integrated rail and bus transport system would be desirable but is unlikely to be achievable.</p>	B.G.C.B.C. (Assistant Director of Education)
<p>Yes. Ebbw Vale Town Bypass. Opportunity existed via Steelworks</p>	B.G.C.B.C. (Research Officer)
<p>Yes. As part of the plan existing and new developments should maximise the use of transportation infrastructure improvements. For example, ensuring that local communities have a wide choice of transport modes to get to and from work.</p>	C.C.W
<p>CPRW is not in a position to indicate a 'specific road, rail or other infrastructure improvements'. It accepts those listed in the text above the question, provided that they do not actively encourage additional travel by motor vehicle.</p>	C.P.R.W

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Yes. The LDP should reflect and support relevant regional transport strategies and the Wales Spatial Plan. It should also recognise the integrated nature of development and seek to locate housing development close to existing centres and transport routes. This strategy would best enable public transport providers to plan for and deliver efficient and regular services that are well used as a result.	D.T.Z
Consideration will need to be given to requirements in relation to both the new Ysbyty Aneurin Bevan hospital (which will provide mainly outpatient, rehabilitation and minor injury services) and also the planned Specialist and Critical Care Centre. The site for the SCCC is not yet determined, but this hospital will provide a full range of emergency services 24/7, as well as specialist planned surgery and investigations.	NPHS
No.	Rhyd Developments Ltd.
5.4 How should transportation policies influence the future location of development?	
It doesn't.	A.H.D Designs
Excessive development pressures need to be avoided within existing urban areas, which may not have the infrastructure to cope with this.	B.G.C.B.C. (Assistant Director of Education)
Changes in population distribution would need to be mapped out to identify its effects on transport, education provision etc. Large-scale housing development in isolation would lead to pressures on the transport infrastructure, as the population lives their life's, e.g. work and school traffic etc.	B.G.C.B.C. (Research Officer)
The location of existing and future transport routes should be a key determinant of where future development is located.	C.C.W
Traffic-generating development must be located in close proximity to established public transport corridors. Where this is not feasible. Maybe because of environmental constraints, a useable bus service, complementing those by rail where available, should be made available before the development is occupied. This applies to residential, business, major retail and large-scale recreational developments.	C.P.R.W
Future development should be located close to existing public transport routes. Development at key settlements would enable the improvement of public transport.	D.T.Z.
The location of future development should be such that it encourages the use of existing or proposed public transport facilities, and cycle and pedestrian routes. We would welcome policies that support frequent and convenient bus and rail networks,	Environment Agency

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<p>cycle paths and pedestrian routes being located in the vicinity of existing and proposed developments.</p>	
<p>Transportation policies should target communities where there is low private car ownership to overcome the problems associated with isolation. Residents in these areas, particularly older people and those with physical disabilities, require transport to and from health and social care facilities (day centres, clinics, hospital outpatients). Not only are these groups heavily reliant on public transport they tend to utilise these services more frequently than other sectors of the population.</p>	<p>NPHS</p>
<p>I feel development should influence transportation, these are easy to adjust.</p>	<p>Rhyd Developments Ltd.</p>
<p>5.5 What actions/policies are needed to create safer neighbourhoods for people to walk and cycle?</p>	
<p>Consider 'Defensible Space' Theory (Oscar Newman 1971) and how it has influenced safer neighbourhood planning.</p> <p>Consider promoting 'Natural Surveillance' whereby communities have the confidence and ability to act as critical eyes.</p> <p>Improve facilities for young people.</p>	<p>B.G.C.B.C. (Research Officer)</p>
<p>To have an appropriate network of local routes across the 3 main valleys of the Borough.</p> <p>Ensure that there are links to regional routes into neighbouring authority areas.</p> <p>For cycling off-road routes should be sourced wherever possible to avoid conflict with car users.</p>	<p>C.C.W</p>
<p>CPRW's suggestions, leading to actions are:</p> <p>(1) The presence of Urban and Countryside Wardens contribute to personal safety and to the perception of security, as does Police patrolling on foot.</p> <p>(2) Footpaths and cycle tracks through residential areas should be well, but not excessively illuminated after dark, and should be overlooked by residences.</p> <p>(3)The urge to close off alleyways that are claimed to harbour criminal activities should be resisted; it does not always result in crime reduction, and interferes with the rights of walkers.</p> <p>(4) Footpaths and cycleways should be separated from roads, and as far as possible, the two uses should be segregated.</p>	<p>C.P.R.W</p>
<p>Increasing the population of settlements and adding to their vitality can help to</p>	<p>D.T.Z.</p>

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<p>increase activity in an area and reduce the fear of crime. Settlements need to promote the opportunity of walking in the first instance, by locating housing development in close proximity to services and infrastructure. Directing growth to areas close to services and infrastructure can promote walking and cycling trips.</p>	
<p>The valleys most having old railway lines could easily be converted for cycle paths.</p>	<p>Rhyd Developments Ltd.</p>
<p><u>ENVIRONMENT</u></p>	
<p>6.1 How can we ensure that biodiversity is protected and enhanced within the County borough?</p>	
<p>Landscape areas are good features. However, they are hard to maintain after and generally become run down or untidy.</p>	<p>A.H.D Designs</p>
<p>By avoiding high density residential development By linking biodiversity to development and viewing development as an opportunity and not as a threat</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>As a small & exposed local Authority, there is a significant need to protect BG from inappropriate forms of development (although obviously, the planning process is designed to perform this). Due to electrical infrastructure upon Rassau Industrial estate, repeated attempts at developing various forms of power station, whether renewable or otherwise, are consistently being forwarded. The forthcoming LDP should orient suitable of appropriate protection against undesirable schemes through adoption of a purposefully prescribed policy, as a ‘sword’ for the Planning Team to wield, (should it be considered necessary). Similarly, BG’s topography lend itself to medium – scale wind developments & of a suitably worded policy should be adopted to assist us in embracing any such developments that are appropriate & refusing those which are not. Small scale & embedded application of RE forms should be looked at on a regular basis, typically, as part of the Planning Assessment process.</p> <p>This questionnaire does not appear to cater for the needs of Waste Management, both in terms of our Waste Strategy – how we intend to accommodate disposal of our own wastes (particularly municipal), and also in terms of policy for the appropriate manner for dealing with commercial proposals of this nature. Over recent years, legislation & policy have driven waste management further up the agenda; as a result, a plethora of private sector, “waste management” companies, are forever looking to “find a home”. Many of these are undesirable in nature & do</p>	<p>B.G.C.B.C. (Business Environment Local Coordinator)</p>

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<p>not correspond directly to the needs for dealing with BG's own waste arisings. Suitable protection needs to be incorporated into the LDP, in order to aid protection of BG – its communities, environment & its tourism potential may all potentially suffer, where an inappropriate proposal is manifested.</p>	
<p>Ensure that key Biodiversity sites are not allocated within the LDP for development. In addition to protecting the environment it is also important that the Plan allows for the opportunity to enhance.</p> <p>With increased fragmentation of habitats as a result of development, it will become increasingly difficult for flora and fauna to move and occupy habitats across the countryside. For certain species, the reduction and fragmentation of habitats means that their populations will become increasingly unviable. This effect is likely to be compounded by the anticipated effects of climate change. Increases in average temperatures will lead to changes in the extent and location of habitats in turn leading to the migration or extinction of species.</p> <p>The Plan should therefore include the need to maintain and create ecological connectivity through a dedicated network of ecological corridors throughout the County Borough.</p> <p>Additionally as local authorities have a duty under Regulation 37 of the Conservation (Natural Habitat &c) Regulations 1994 to include policies encouraging the management of features of the landscape which are of major importance for wild flora and fauna.</p> <p>Biodiversity should include identification and protection of those areas important for geological conservation.</p>	C.C.W
<p>(1) A crucial means of protecting and enhancing biodiversity within the county Borough is to include policies in the LDP that make it difficult for developers to gain planning permission for works that will have an unacceptably adverse impact on areas designated for their ecological importance.</p> <p>(2) Another important way of proceeding to institute a comprehensive educational programme, with the aid of the Wildlife Trust and other environmental organisations. The aim should be to foster an interest and knowledge of local wildlife and the wish to protect it and the place it occupies.</p> <p>(3) Support should be given to the establishment of wildlife corridors where these are not in existence and to seeking to reverse the fragmentation of habitats.</p>	C.P.R.W
<p>By trying to protect the land of greatest biodiversity merit and taking biodiversity into</p>	D.T.Z.

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	consideration in conjunction with other costs and benefits.	
	<p>Biodiversity can be protected and enhance within Blaenau Gwent by:</p> <ul style="list-style-type: none"> • Endorsing the LBAP (Local Biodiversity Action Plan) and views expressed by the Environmental Partnership group that advises on ecological issues. • Fully protecting known UK BAP species and habitats. • Following TAN 5 guidelines. • Maintaining adequate buffer zones and corridors between new developments and surface watercourses and existing ponds / lakes. • Reducing culverting of watercourses and promoting the opening of old culverts where feasible. • Promoting the designation of more SINC's (Sites of Importance for Nature Conservation) locally. This would require more ecological surveying to identify existing interests that might not be known. • Seeking enhancements as part of developments, for example the creation of ponds and wetland areas. 	Environment Agency
	Obviously green belt is protected and I feel there is plenty of land in the borough to develop away from these areas.	Rhyd Developments Ltd.
6.2 How can policies in the LDP identify, protect and enhance local landscape?		
	Not possible as most of it is in private ownership.	A.H.D Designs
	By ensuring appropriate access to the landscape By ensuring development (design, use of materials etc.) is sympathetic to the locality.	B.G.C.B.C. (Assistant Director of Education)
	As a small & exposed local Authority, there is a significant need to protect BG from inappropriate forms of development (although obviously, the planning process is designed to perform this). Due to electrical infrastructure upon Rassau Industrial estate, repeated attempts at developing various forms of power station, whether renewable or otherwise, are consistency being forwarded. The forthcoming LDP should orient suitable of appropriate protection against undesirable schemes through adoption of a purposefully prescribed policy, as a 'sword' for the Planning Team to wield, (should it be considered necessary). Similarly, BG's topography lend itself to medium – scale wind developments & of a suitably worded policy should be adopted to assist us in embracing any such developments that are appropriate & refusing those which are not. Small scale & embedded application of	B.G.C.B.C. (Business Environment Local Coordinator)

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<p>RE forms should be looked at on a regular basis, typically, as part of the Planning Assessment process.</p> <p>This questionnaire does not appear to cater for the needs of Waste Management, both in terms of our Waste Strategy – how we intend to accommodate disposal of our own wastes (particularly municipal), and also in terms of policy for the appropriate manner for dealing with commercial proposals of this nature. Over recent years, legislation & policy have driven waste management further up the agenda; as a result, a plethora of private sector, “waste management” companies, are forever looking to “find a home”. Many of these are undesirable in nature & do not correspond directly to the needs for dealing with BG’s own waste arisings. Suitable protection needs to be incorporated into the LDP, in order to aid protection of BG – its communities, environment & its tourism potential may all potentially suffer, where an inappropriate proposal is manifested.</p>	
<p>Policies should be aimed at protecting local landscapes of high value for their visual and historic qualities. The information from Landmap and other relevant sources should be used to identify Special Landscape areas in the County Borough. CCW would be happy to advise further on this issue.</p>	C.C.W
<p>In order to improve the ease with which Special Landscape Areas are identified, they should be listed under the relevant policy in the LDP (the UDP only lists local Landscape Areas).</p> <p>Enhancement, where appropriate, should find a place in protective policies and in those designed to regulate development in these designated areas.</p>	C.P.R.W
<p>The use of planning policies that are criteria based. Blanket designations can put high quality land at risk from development and restrict development on land that could be released to help achieve the aims of the LDP.</p>	D.T.Z.
<p>Policies should take a holistic view of landscape and promote the idea of green connectivity, that is, green corridors that can provide ecological links, such as river corridors, hedgerows and woodlands. New developments should not adversely impact on existing green corridors and should look to provide missing links where appropriate. We are likely to comment further on relevant policies.</p>	Environment Agency
<p>By putting pressure on developers to model buildings to suit the surrounding areas.</p>	Rhyd Developments Ltd.
<p>6.3 Is the countryside within the Plan afforded too much/too little or sufficient protection from development?</p>	

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<p>Not possible as most of it is in private ownership.</p>	<p>A.H.D Designs</p>
<p>Too much. The countryside needs to be protected, but limited development within countryside areas can have positive benefits if undertaken sympathetically.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>As a small & exposed local Authority, there is a significant need to protect BG from inappropriate forms of development (although obviously, the planning process is designed to perform this). Due to electrical infrastructure upon Rassau Industrial estate, repeated attempts at developing various forms of power station, whether renewable or otherwise, are consistency being forwarded. The forthcoming LDP should orient suitable of appropriate protection against undesirable schemes through adoption of a purposefully prescribed policy, as a ‘sword’ for the Planning Team to wield, (should it be considered necessary). Similarly, BG’s topography lend itself to medium – scale wind developments & of a suitably worded policy should be adopted to assist us in embracing any such developments that are appropriate & refusing those which are not. Small scale & embedded application of RE forms should be looked at on a regular basis, typically, as part of the Planning Assessment process.</p> <p>This questionnaire does not appear to cater for the needs of Waste Management, both in terms of our Waste Strategy – how we intend to accommodate disposal of our own wastes (particularly municipal), and also in terms of policy for the appropriate manner for dealing with commercial proposals of this nature. Over recent years, legislation & policy have driven waste management further up the agenda; as a result, a plethora of private sector, “waste management” companies, are forever looking to “find a home”. Many of these are undesirable in nature & do not correspond directly to the needs for dealing with BG’s own waste arisings. Suitable protection needs to be incorporated into the LDP, in order to aid protection of BG – its communities, environment & its tourism potential may all potentially suffer, where an inappropriate proposal is manifested.</p>	<p>B.G.C.B.C. (Business Environment Local Coordinator)</p>
<p>Too little. Only a comparatively small part of the County Borough is afforded legal protection. For example only 3 Sites of Special Scientific Interest have been notified. However there are habitats and species of Biodiversity importance not afforded site protection. Therefore, it is important that Sites of Importance for Nature</p>	<p>C.C.W</p>

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Conservation (SINCs) are identified and adequately protected as part of the LDP.	
Sufficient. CPRW is firmly of the view that if it is the case that the countryside has succumbed to development pressure since the UDP was adopted in 2006, more stringent policy-making is needed.	C.P.R.W
Sufficient. The countryside should be retained for its intrinsic values. However, it is also important to weigh this aim with the other sustainability, social and economic aims of the LDP. For example, the LDP seeks significant housing growth. This growth should be provided at key settlements and this growth should not be unduly restricted by the need to protect the countryside, as this could result in development on inappropriate sites which run counter to sustainability issues and the wider aims of the LDP.	D.T.Z.
The protection and enhancement of green corridors and the countryside should be given sufficient weight within the planning system now, in order to protect and maintain the habitat and the species for future generations.	Environment Agency
Sufficient. Again, enough other land available.	Rhyd Developments Ltd.
6.4 Should the existing boundaries of such areas be examined to determine their accuracy?	
No Why yes	A.H.D Designs
Yes. Possibly a more flexible approach should be considered if, overall, it helps to reduce the density of development in other areas. Artificial boundary lines may not help in addressing wider needs.	B.G.C.B.C. (Assistant Director of Education)
Yes. SINCs are currently being identified so there is a clear need to determine their boundaries and adequacy. The use of Special Landscape Areas within the LDP need to be reassessed using Landmap.	C.C.W
CPRW has answered YES to this question, but qualifies it by saying the Green Wedges designation should be re-examined and its coverage adjusted if it proves to have been affording insufficient protection against settlement coalescence.	C.P.R.W
Yes.	D.T.Z.

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<p>However, it would be difficult for the Council to comprehensively reassess the adequacy of all land and boundaries. It may be more appropriate to use criteria based policies that require development proposals to consider the quality of the landscape etc. This element of flexibility should be afforded where it can be demonstrated that land is not of sufficient quality to warrant retention or where other aims such as sustainability development outweigh the loss. The need to expand settlements in order to promote sustainable growth should also be taken into account.</p>	
<p>Yes. Green wedges provide vital buffers between developments and have aesthetic and ecological value. We support strong protection of these areas.</p>	<p>Environment Agency</p>
<p>No. At the moment no need.</p>	<p>Rhyd Developments Ltd.</p>
<p>6.5 Is the UDP approach to identifying Mineral Exclusion Zones acceptable?</p>	
<p>No Not necessary.</p>	<p>A.H.D Designs</p>
<p>No. This proposal goes well beyond existing minerals planning guidance and is thus not acceptable. Nowhere in such guidance is a 500m buffer zone stipulated. Existing minerals planning guidance also permits minerals extraction in most, if not all, of the areas identified in the approach as being areas where extraction will not be permitted provided strict conditions are met. The approach should be amended to bring it into line with existing minerals planning guidance.</p>	<p>CoalPro</p>
<p>Yes. CPRW is satisfied that the 'UDP approach to identifying Mineral Exclusion Zones' is acceptable</p>	<p>C.P.R.W</p>
<p>We have not answered yes or no because the UDP approach may be acceptable, but the Council should still consider whether it is appropriate to plan on this basis over the next plan period.</p>	<p>D.T.Z.</p>
<p>The reference to current mineral exclusion zones includes areas 'where there would be an undue impact on the environment', does not specifically mention the water environment or water resources. The following should be taken into consideration, when identifying Mineral Exclusion Zones: Local minerals (Millstone Grit and karstic limestone) form the basis of aquifers in</p>	<p>Environment Agency</p>

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<p>Blaenau Gwent, which are drawn upon for public water supply as well as providing baseflow to local rivers. These aquifers should be protected.</p> <p>In particular, it should be noted that virtually all of the Carboniferous limestone outcrop and associated overlying Millstone Grit that is present in the northwest corner of the Local Authority area lies within the designated Source Protection Zone for Shon Sheffrey. This is a public water supply abstraction, which draws upon two springs discharging from the Carboniferous limestone into the reservoir at the top of the catchment for the Sirhowy River. No mineral extraction should take place in this area.</p> <p>Proximity to aquatic features such as rivers, ponds, marshes, wet woodland etc needs to be taken into consideration when designating areas for mineral extraction. Hydrological implications of mineral working activity would need to be fully assessed.</p>	
<p>Yes. For the protection of landscape and peoples rights.</p>	<p>Rhyd Developments Ltd.</p>
<p>6.6 How can renewable energy resources be harnessed without causing undue harm to the environment or the quality of life for local communities?</p>	
<p>I am all for it (wind farms would benefit this area & they don't have to be on our doorstep.</p>	<p>A.H.D Designs</p>
<p>The use of wind and water power needs to be considered sympathetically together with other methods of power generation which have a low environmental impact.</p>	<p>B.G.C.B.C. (Assistant Director of Education)</p>
<p>As a small & exposed local Authority, there is a significant need to protect BG from inappropriate forms of development (although obviously, the planning process is designed to perform this). Due to electrical infrastructure upon Rassau Industrial estate, repeated attempts at developing various forms of power station, whether renewable or otherwise, are consistency being forwarded. The forthcoming LDP should orient suitable of appropriate protection against undesirable schemes through adoption of a purposefully prescribed policy, as a 'sword' for the Planning Team to wield, (should it be considered necessary). Similarly, BG's topography lend itself to medium – scale wind developments & of a suitably worded policy should be adopted to assist us in embracing any such developments that are appropriate & refusing those which are not. Small scale & embedded application of</p>	<p>B.G.C.B.C. (Business Environment Local Coordinator)</p>

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<p>RE forms should be looked at on a regular basis, typically, as part of the Planning Assessment process.</p>	
<p>CCW would promote the use of renewable energy resources including wind power, hydro-electric and biomass production where this is compatible and does not significant harm the local environment. Each proposal would need to be assessed on its own merits.</p> <p>Some work on identifying suitable locations for renewable energy production could be conducted to help inform future use. For example, Landmap could be used to identify suitable locations for future wind energy production.</p>	C.C.W
<p>As a national charity with the principal remit that of seeking to safeguard the Welsh landscape from development that has an adverse visual impact, CPRW has a strong objection to wind power development in the most prominent and scenic countryside. This stance is echoed by the Newport and Valleys branch.</p> <p>Sensitively sited small renewable energy generation of all varieties, is, however, supported.</p> <p>It is important that biomass feedstock is produced in the closest possible proximity to generation plants.</p>	C.P.R.W
<p>The LDP should be informed by consultation with local communities and other stakeholder.</p>	D.T.Z.
<p>During construction of renewable energy projects, watercourses must be protected, as must soils and emissions to air. Any waste generated during the production of energy should have an identified disposal route, preferably a reuse or recycling option to reduce amount going for final disposal. We would recommend full assessment of renewable energy projects.</p> <p>When considering the siting of renewable energy projects, please note that water abstraction may be necessary. Schemes should therefore ensure that adequate water is available for abstraction when needed.</p> <p>In locating and construction renewable energy projects, consideration should be given to the protection and enhancement of water features in the area, including wells, springs and watercourses.</p>	Environment Agency
<p>Renewable energy resources are important in ensuring future wellbeing, but considerable need for community education remains. More extensive community involvement, particularly with small scale schemes may help to extend their use and avoid harm to the environment and quality of life.</p>	NPHS

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With Blaenau Gwent's terrain wind farms are a must.	Rhyd Developments Ltd.
<u>LEISURE, RECREATION & TOURISM</u>	
7.1 Is there adequate protection of open spaces?	
Open spaces should be reduced due to the fact that we have so much of it	A.H.D Designs
Yes. The need to protect open spaces should be recognised. However, open spaces and green corridors, as well as access to existing open space need to be considered in the context of the wider re-development strategy and other priorities.	B.G.C.B.C. (Assistant Director of Education)
No. The current work commissioned by Blaenau Gwent on the assessment of natural green space in the County Borough should help with this issue. This work should provide information on the amount, location and condition of natural green space and its availability against CCW's green space toolkit.	C.C.W
CPRW considers that UDP Policy R6, together with Policy EN20, provides 'adequate protection of open spaces', taking latest Welsh Assembly Government (draft) guidelines into account.	C.P.R.W
Yes. Planning policies are an effective tool for protecting open spaces.	D.T.Z.
We are of the opinion that there is not enough adequate protection for existing open spaces. Their value as recreational, ecological and aesthetic features is often under-estimated. They are important buffers for often stressful urban areas. The areas also provide ecological refuges to some extent and play a part in green corridor connectivity. They are crucial in contributing to environmental well being by providing a recreation and aesthetic resource. We would encourage local designations, for example nature reserves, or parks for these areas, in addition to the National Park. The protection and enhancement of green corridors and the countryside should be given sufficient weight within the planning system now, in order to protect and maintain the habitat and the species for future generations.	Environment Agency
<i>Questions 7.1 and 7.4</i> Many residents do not currently access green spaces for leisure and recreation. Creating easier access to such spaces would allow people to make the most of their natural environment and perhaps take part in walking or other activities, with	NPHS

<p>all the associated health benefits that this brings. As an example for comparison, the 'Beacons Bus' service shuttles people on a route around the national park, giving them the option to walk or cycle as far as they wish before taking the bus back to their destination. This would not only enable residents to access a natural environment not previously available to them, but could also be a potential tourist attraction.</p> <p>Careful consideration should be given to the development of any recreational spaces, ensuring that they meet the actual needs of the population. Planning policies should ensure that applications for the development of recreational facilities are supported by locally identified need, and provision for the organisation and development of activities once the facility is in place. This would prevent such facilities being under-used or problematic to maintain (e.g. due to vandalism). Where recreational space is available but not in use, communities should be supported and enabled to take ownership of it in order to develop an amenity that serves their needs. Enabling communities to take ownership of their environment in this way makes it more likely that the facility will be valued, regularly used and informally policed by the community. Planning policy will also need to make provision for informal recreation and play spaces (for young and old) as well as those for competitive sports, as it is these which are most likely to improve the overall activity levels of the population.</p> <p>Biodiversity and 'wild' open spaces are also beneficial to general wellbeing, but in order to maintain this, there needs to be channeling of recreational use of open spaces, to ensure appropriate sites are left sufficiently undisturbed</p> <p>If the planned development of the old works offices at the Corus site as a visitor centre goes ahead, then access to the nearby mountain top plateaux should be considered. This could enable both local residents and visitors to gain easy access to relatively level, signposted walking routes at a higher altitude, with views over the nearby valleys area.</p> <p>Facilities for cycle hire and repair at the new rail station in Ebbw Vale could again benefit both residents and visitors by enabling active travel for both leisure and employment or domestic use.</p> <p>At present there are few small catering outlets providing refreshments aimed at visitors, particularly during evenings and weekends. Many of the outlets that do exist have a limited range of healthier options. Improving this situation would again</p>	
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	benefit both local residents and visitors.	
	Yes. However, developers on large sites should create these areas.	Rhyd Developments Ltd.
7.2 Should local standards be further developed or examined against NPFA standards?		
	We can't sustain what we have.	A.H.D Designs
	No. Recreational and leisure needs are changing. Grass playing fields are not necessarily the highest priority. The opportunity to enhance or provide a wide range of alternative provision associated with development should be considered, particularly associated with school sites.	B.G.C.B.C. (Assistant Director of Education)
	Yes. The NPFA are recognised national standards against which recreation provision should be assessed.	C.C.W
	Yes. Given that Blaenau Gwent County Borough Council adopted its UDP standards in 1996, and in the light of recently proposed NPFA changes, it is desirable that local recreational space standards should be examined at this juncture.	C.P.R.W
	Yes. The Council should consider local need and policies requiring the provision of open space should provide this flexibility. More importantly, the LDP should develop a clear position on the need for recreation land to give information to developers early in the planning process.	D.T.Z.
	No. But yes if they are policed correctly.	Rhyd Developments Ltd.
7.3 If a need for more land is identified in the open space assessment where should this be located?		
	There is a vast amount of open space (generally above 1,200 feet). The ability to access and develop this (in terms of tourism and recreation) needs to be considered.	B.G.C.B.C. (Assistant Director of Education)
	Open space should be accessible and integral part of local communities. There should be connectivity between local green space and the wider countryside e.g. Common Land.	C.C.W
	While it is not possible to pinpoint geographical locations for 'open space' provision (if required), CPRW agrees with the statement made in the text above this question.	C.P.R.W
	New facilities should be provided close to large populations, where there is a clear	D.T.Z.

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current deficiency and close to public transport routes.	
Recreational open space areas should not compromise areas that might have sensitive ecological value. Therefore development of new open space land would require ecological assessment.	Environment Agency
No. We have enough open space in the valleys.	Rhyd Developments Ltd.
7.4 In addition to current provision are there additional opportunities for developing tourism within the Plan area?	
Tourism for BGCBC means day-trippers only. No accommodation. No caravan sites. Arguably nothing to bring tourism to the area.	A.H.D Designs
Yes. This needs to be considered in the context of a regional strategy, including heritage attractions, the countryside and potential development opportunities within the countryside. This relates to 'quality of life' issues.	B.G.C.B.C. (Assistant Director of Education)
As per answer to sub-section 6.6 – prevention of inappropriate developments will positively affect BG's potential for developing as a tourist area. Similar sentiments are considered appropriate for raising, relative to sub-section 8.1 overleaf. Iso – a high quality hotel should be located upon Parc Bryn Bach (although many people have been beating this drum for years now...).	B.G.C.B.C. (Business Environment Local Coordinator)
No direct response is made. Organisations such as HERIAN will, no doubt, have answers to the question as to 'additional opportunities for developing tourism within the Plan area'. Tourism development must be accompanied by sustainable means of travel to these new facilities – to be put in place if not already in existence. The value of connectivity between tourism destination –within and outside the County Borough – should be borne in mind.	C.P.R.W
Yes. Tourism can contribute to the economy of the area, and particularly rural areas, and its growth should be encouraged.	D.T.Z.
Freshwater fisheries have an important role to play in developing angling and getting more people to take up the sport. We would welcome policies that promote freshwater fishing as a form of tourism, in particular by encouraging the following: - more fishing opportunities on rivers, lakes and canals and more information available about them;	Environment Agency

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<p>-more people from a wider range of backgrounds (such as the disabled) to go fishing. In particular, we consider the following local ponds to be suitable for developing opportunities for angling: Blue Lake (top) St Ives Lake (middle) and McHardings pond (bottom) map ref SO 15410</p>	
<p>Yes. For example, Bryn Bach Park should have chalets, hotel and leisure facilities.</p>	Rhyd Developments Ltd.
<p>8.1 Are there any other issues?</p>	
<p>Consultation to landowners affected by the U.D.P. line. This has never been done in the past.</p>	A.H.D Designs
<p>The fundamental importance of the development of education and skills for the viability of future communities needs to be recognised, particularly in terms of maximising the potential of local people but also in terms of making Blaenau Gwent appealing to those who may consider moving to the area.</p>	B.G.C.B.C. (Assistant Director of Education)
<p>This questionnaire does not appear to cater for the needs of Waste Management, both in terms of our Waste Strategy – how we intend to accommodate disposal of our own wastes (particularly municipal), and also in terms of policy for the appropriate manner for dealing with commercial proposals of this nature. Over recent years, legislation & policy have driven waste management further up the agenda; as a result, a plethora of private sector, “waste management” companies, are forever looking to “find a home”. Many of these are undesirable in nature & do not correspond directly to the needs for dealing with BG’s own waste arisings. Suitable protection needs to be incorporated into the LDP, in order to aid protection of BG – its communities, environment & its tourism potential may all potentially suffer, where an inappropriate proposal is manifested.</p>	B.G.C.B.C. (Business Environment Local Coordinator)
<p>None.</p>	B.G.C.B.C. (Research Officer)
<p>Waste management. Forestry and agriculture; in particular protection of valuable soil areas. Water; in particular consideration of water resources, consumption and flooding.</p>	C.C.W
<p>Conspicuous for its absence is a section upon WASTE MANAGEMENT, which is only mentioned, as far as CPRW has discovered, as a brief reference to ‘land (is) needed for waste facilities’ - in the 2nd paragraph under the Land Requirement heading on page 16 of the Issues Paper.</p>	CPRW
<p>We consider that the key issues informing the production of the Blaenau Gwent</p>	D.T.Z.

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<p>Local Development Plan have been successfully identified.</p>	
<p>This process is also new to stakeholders and we welcome the opportunity of discussing the LDP and SEA process with the LPA further. This is in relation to the robust evidence required including assessments to meet test of soundness of the Plan such as Strategic Flood Consequence Assessment and Drainage (foul water assessments). We would also welcome further dialogue on the content of Policies, and Supplementary Planning Guidance/Topic Papers to be included in the Plan.</p>	<p>Environment Agency</p>
<p>The Federation would like assurances that viability and flexibility will be taken into account when creating the policies to be included within the LDP. The Federation would like to stress that the availability of land for development may be placed in jeopardy, if the requirements placed on developments are not properly considered alongside land costs and site viability. The availability of land is the key element for the council to achieve its housing and indeed affordable housing targets and LDP policies must be flexible enough to allow for these issues to be accounted for, in order for the appropriate amount of land to come forward for development. The LDP should clarify its priorities and aim to create policies that achieve a sensible balance with what is viable and realistically achievable on the ground. As a result, the HBF would like an assurance that the LDP and its policies will promote a flexible and pragmatic approach to the requirements placed on developments and that the viability of the development will be a key priority when creating policies that require developer contributions.</p>	<p>Home Builders Federation</p>
<p>Some communities are more vulnerable than others to the effects of surrounding land use, and it may be helpful to consider ‘vulnerable community sites’ as a specific issue. This may include schools (large quantities of children and young people in regular attendance), Traveller sites (concentration of young families, often marginalised by other local communities), housing designed for specific groups, e.g. frail elderly, the disabled (may have greater issues with access, fear of crime, etc). Once recognised, many potentially adverse factors can be designed out of these sites, even where the site is already in existence.</p> <p>It may be useful to involve a few other groups in the consultation in addition to the Local Public Health Team:</p> <ul style="list-style-type: none"> • The Children and Young People’s Partnership • The Older People’s Partnership • Communities First Partnerships (who have done some extensive mapping 	<p>NPHS</p>

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	and consultation work at grass roots level with local communities)	
	No everything seems to be covered.	Rhyd Developments Ltd.
9.1 Do you wish to attend the Vision, Objectives and Options workshops in October/November 2007?		
	No	A.H.D Designs
	Yes	B.G.C.B.C. (Assistant Director of Education)
	Yes	B.G.C.B.C. (Business Environment Local Coordinator)
	Yes	B.G.C.B.C. (Research Officer)
	Yes	C.C.W
	No reply	CoalPro
	Yes	CPRW
	No reply	Home Builders Federation
	Yes	D.T.Z.
	Yes	Environment Agency
	No reply	Local Health Board
	No reply	Nantyglo and Blaina Town Council
	No reply	NPHS
	Yes	Rhyd Developments Ltd.
General Comments		
	<p>Key elements of our partnership working will need to focus on the following areas: Ensuring that the Health, Social Care and Well Being Strategy links effectively with the County Borough's Community Plan and Local Development Plan and delivers in an integrated way to meet the known and future needs of local people. To work together in what are changing national and local contexts for public services and maximising the opportunities that might be brought through initiatives such as the development of a Local Service Board for Blaenau Gwent. Work together to utilize nationally agreed approaches in relation to sustainable development. Working with tools provided by the Welsh Assembly Government such as 'A Healthy Sustainable Wales'. This will need to form an important part of strategies such as the Health, Social Care and Well Being Strategy linked to the Local Development Plan Plans are already well advanced for the development of a new hospital for Blaenau</p>	Local Health Board

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<p>Gwent – Ysbyty Aneurin Bevan. The hospital is to be built as a key element of the regeneration Master Plan for the former steelworks site in Ebbw Vale. This is an exciting and important project for health services and health care in Blaenau Gwent. The LHB hopes we can continue to build on our positive partnership through this development and link with the Council further in the future to identify appropriate land throughout the County Borough as the LHB implements its Primary Care Strategy and the development and reconfiguration of primary care estate and facilities.</p>	
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BLAENAU GWENT COUNTY BOROUGH
COUNCIL



**LOCAL DEVELOPMENT PLAN 2006-2021
QUESTIONNAIRE ON ISSUES PAPER**

Developing the Vision and Objectives

Question 1.1 Should the Community Plan provide the vision and objectives or should more work be undertaken to develop new objectives based on National Planning Guidance, the Wales Spatial Plan, the Heads of the Valleys Strategy, the UDP, the Community Plan and the issues identified?

- Provide the vision and objectives
- More work

Please explain your answer below

Delivering Sustainable Development

Question 1.2

How can the Plan ensure that new development is sustainable and encourage the wider use of sustainability principles?

Appendix C: Questionnaire on Issues Paper

Level of Growth

Question 2.1 Do you agree with the assessment of the population situation?

Yes

No

If No, please explain why not below

Is it acceptable to use the SE Wales Strategic Planning Group figure as one option for growth?

Yes

No

If No, please explain why not below

What other options might be put forward?

Location of Development

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Question 2.2 If a growth option is proposed, how should future growth be distributed throughout the Plan Area? Should it be based on the UDP Settlement Strategy, described above, or are there more sustainable patterns that should be considered?

- Strategy outlined
- Other sustainable strategy (*please explain below*)

Question 2.3 Are there settlements or areas where future development should be controlled differently?

Yes

No

Please explain where and why below

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Question 2.4 Are there settlements or areas where future development should be encouraged and, if so, explain where and why?

Yes

No

If Yes, please explain where and why below

Question 2.5 In view of the preference for the development of Brownfield sites before Greenfield sites should the Plan look at identifying all Brownfield sites regardless of their location and the needs of the various communities?

Yes

No

Please explain your answer

Creating Mixed and Balanced Communities

Question 2.6 Should the Plan look at increasing housing densities generally or should it attempt to cater for a range of densities according to the location of the site in relation to public transport?

Increase densities generally

Cater for range of densities

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Please explain your answer

Meeting the needs of an Ageing Population

Question 2.7 How can the Plan cater for the Housing Needs of the ageing population?

Improving the Design and Sustainable credentials of new development

Question 2.8 How can the Plan assist in the delivery of high quality schemes that are sustainable?

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Delivering Affordable Housing

Question 2.9 Should the threshold of 30 be reduced to ensure that the affordable housing needs of the population are met?

Yes

No

Please explain your answer below

Question 2.10 What percentage of a housing site should be affordable?

10%

20%

30%

40%

Other

As set out in the HMA

Dependent on viability

Please explain your answer below

Provision of Community Facilities

Question 2.11 What should the approach of the new LDP be in relation to the provision of new facilities?

EMPLOYMENT

Land Requirements

Question 3.1 Should we be looking to reallocate employment land identified in the UDP?

Yes No

If Yes, how much land should be retained for employment use?

If No, please explain why not.

Type of Employment Land

Question 3.2 What type of employment land is needed? *(please explain below)*

Protection of Employment Sites

Question 3.3 Should existing employment sites continue to be retained for employment use with a presumption against development for alternative uses or should a more flexible approach be considered?

Existing use only More flexible approach

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Please explain your answer below

TOWN CENTRES

Roles and Hierarchy of Town Centres

Question 4.1 What are the future roles and functions of the current retail centres in Blaenau Gwent? (*Please explain below*)

Question 4.2 Should we look to identify which towns have the most potential for retail?

Yes

No

Please explain your answer

Should we look to reassess the retail hierarchy and retail boundaries for the town centres?

Yes

No

Please explain your answer

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Declining Town Centres

Question 4.3 How can we promote vibrant and vital town centres? *(Please explain below)*

Should the Plan encourage a mix of uses in the town centre?

Yes

No

Please explain your answer in the box below

Need for more retail space

Question 4.4 Does the plan need to identify additional retail space?

Yes

No

If Yes, where should it be located?

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Protecting Local Neighbourhood Centres

Question 4.5 Should the plan aim to protect local shopping facilities?

Yes

No

Please explain your answer in the box below

TRANSPORT

Spreading the benefits of regeneration through integrated transport

Question 5.1 What policies can be put in place to ensure that the new rail access and the facilities to be provided at the former steelworks site aid the regeneration of the wider area? *(Please explain below)*

Improving accessibility

Question 5.2 Are there specific measures, which could be taken to encourage the use of a range of different forms of transport?

Yes No

If Yes, please explain

Improving Connectivity

Question 5.3 Are there specific road, rail or other infrastructure improvements that are required?

Yes No

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If Yes, please explain

Reducing the need to travel

Question 5.4 How should transportation policies influence the future location of development? *(Please explain below)*

Safer Neighbourhoods for people to Walk and Cycle

Question 5.5 What actions or policies are needed to create safer neighbourhoods for people to walk and cycle? *(Please explain below)*

ENVIRONMENT

Protecting Biodiversity

Question 6.1 How can we ensure that biodiversity is protected and enhanced within the County Borough? *(Please explain below)*

Protection of the Landscape

Question 6.2 How can policies in the LDP identify, protect and enhance local landscape? *(Please explain below)*

Levels of protection given to the Countryside

Question 6.3 Is the countryside within the Plan afforded too much/too little or sufficient protection from development?

Too much

Too little

Sufficient

Please explain your answer below

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Question 6.4 Should the existing boundaries of such areas be examined to determine their adequacy?

Yes No

Please explain your answer below

Protection of Mineral Reserves

Question 6.5 Is the UDP approach to identifying Mineral Exclusion Zones acceptable?

Yes No

Please explain your answer below

Harnessing Renewable Energy Resources

Question 6.6 How can renewable energy resources be harnessed without causing undue harm to the environment or the quality of life for local communities?

Please explain your answer below

LEISURE, RECREATION AND TOURISM

Protection of Open Space

Question 7.1 Is there adequate protection for open spaces?

Yes

No

Please explain your answer below

The need for more land for recreation

Question 7.2 Should local standards be further developed or examined against NPFA standards?

Yes

No

Please explain your answer below

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The Location of New Facilities

Question 7.3 If a need for more land is identified in the open space assessment where should this be located?

Please explain your answer below

New Tourism Facilities

Question 7.4 In addition to current provision are there additional opportunities for developing tourism within the Plan area?

Yes

No

If Yes please explain what they are and where should they be located.

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Other Issues

Question 8.1 Are there any other issues, which have not been previously identified? If so, please identify any issues below

Workshops

Question 9.1 Do you wish to attend the Vision, Objectives and Options Workshops, which will take place between October and November 2007?

Yes

No

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Your Details

Name

Organisation

Thank you for your time and valuable response.

PLEASE RETURN THE COMPLETED QUESTIONNAIRE TO THE FOLLOWING ADDRESS BY 8TH AUGUST 2007:

Lynda Healy
Development Plans Manager
Blaenau Gwent County Borough Council
Business Resource Centre
Tafarnaubach Industrial Estate
Tredegar
NP22 3AA

Or e-mail: planningpolicy@blaenau-gwent.gov.uk