

SD14



**BLAENAU GWENT COUNTY BOROUGH COUNCIL  
LOCAL DEVELOPMENT PLAN**

**STATEMENT OF COMMON GROUND BETWEEN  
COUNTRYSIDE COUNCIL FOR WALES AND  
BLAENAU GWENT COUNCIL**

**February 2012**

## Introduction

This Statement of Common Ground has been prepared to identify the areas of agreement between Countryside Council for Wales (CCW) on matters relating to the Blaenau Gwent Deposit Local Development Plan and the representations submitted by the Countryside Council for Wales concerning that document. A meeting was held on 27<sup>th</sup> October 2011 between CCW and Blaenau Gwent to discuss the main objections raised by CCW.

The changes and the Council's agreed response to each are included in Appendix 1 attached. The outstanding issues between Blaenau Gwent and Countryside Council for Wales are set out below.

## Outstanding Issues

### **(1) Lack of objective for the protection, enhancement and management of the Borough's unique landscape (Representation No: 10D.184)**

The Council have agreed to amend objective 12 as set out in FC5.A. Although the Countryside Council for Wales welcome the amended objective CCW recommend that FC5.A is amended to read 'The valuable landscape of Blaenau Gwent has been protected, enhanced and managed and together with *other elements* of the natural heritage...' It is considered that this is best dealt with through a written representation to the focussed changes consultation.

### **(2) Objective 7 to include a reference to County Residents also benefiting from the protection and enhancement of the natural environment (Representation No 10D.188)**

### **(3) Chapter 5.0: Spatial Strategy - The Strategy lacks reference to the environment (Representation No 10D.203)**

### **(4) Chapter 5.0: Spatial Strategy - SINC's are not covered (Representation No 10D.204)**

### **(5) Policy SP1 - Need for criterion on the natural environment (Representation No 10D.206)**

### **(6) Policy SP10 - General support but queries what is meant by 'important species' (Representation No 10D.216)**

To address this representation the Council amended Policy SP10 as set out in FC5.C. CCW object to the deletion of criterion c but suggest that there is a need to amend it and suggest the following: 'Giving appropriate consideration to European and nationally designated sites, legally protected species and species and habitats of principal importance for biodiversity conservation importance' or by deleting 'important' from the text. It is considered that this is best dealt with through a written representation to the focussed changes consultation.

**(7) Specific reference should be included in criterion 1 of policy DM1 for a requirement for biodiversity enhancement as set out in TAN 5 and 12 (Representation No 10D.225)**

**(8) Policy DM15 - Should clarify how proposals likely to result in disturbance or harm to legally protected species and their habitat will be assessed (Representation No 10D.239)**

To address this representation the Council agreed to amend Policy DM15 as set out in FC5.F. Whilst CCW welcome the intention to amend the policy to ensure that the Plan makes provision for protecting species, it is not considered that the proposed changes adequately reflect national planning policy. It is recommended that the policy is amended by:

- (i) Replacing priority habitats and species in the last line of criterion 2 with 'habitats and species of principle importance for biodiversity in Wales'
- (ii) Inserting a new criterion 3 which clarifies that proposals which are likely to result in disturbance or harm to a protected species or its habitat will be assessed in accordance with national planning policy.
- (iii) Additional text should be added to the policy amplification to expand on this and state that national policy is as set out in Chapter 5 of Planning Policy Wales and Chapter 6 of Technical Advice Note 5.

**(9) Policy DM16 - For improved clarity, it is recommended that the final sentence of paragraph 7.86 is amended by inserting 'other' before 'SINCs' (Representation No 10D.244)**

The Council have agreed to make this change as set out in MC19. However CCW require an additional statement at the end of the paragraph to confirm that there is no difference in the status of river SINCs and terrestrial SINCs. It is considered that this is best dealt with through a written representation to the focussed changes consultation.

**(10) Policy MU1 - Concern regarding the potential impact of development on Rhyd y Blew and Bryn Serth SINCs and the lack of reference to any provision for open space or the retention of the SINCs (Representation No 10D.255)**

To address this representation the Council have amended Policy MU1 as set out in FC5.H and FC5.I. CCW recommend that the proposed change set out in FC5.I is amended by inserting 'which protects the integrity of, and allows the effective integration...' after 'a network of green links'. It is considered that this is best dealt with through a written representation to the focussed changes consultation.

**(11) Policy MU1 - A significant area of Rhy-y-Blew and Bryn Serth SINCs will be lost to development. No details of how the loss of the biodiversity interests is proposed to be compensated for, and how fragmentation of the retained SINC will be avoided or mitigated (Representation No 10D.256)**

**(12) Policy TM1.2 - Detailed landscaping proposals should be designed to ensure that the ecological interests of the 3 SINCs are maintained (Representation No 10D.278)**

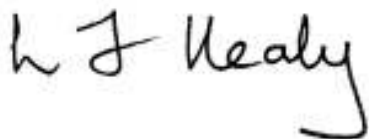
**(13) Policy TM1.3 - Blue Lakes site includes an area of Waun y Pound SINC. Concerned that development at this site will lead to the direct loss of SINC habitat, and that any retained habitat will be lost or damaged as result of increased recreational activity (Representation No 10D.279)**

**(14) SSSIs and LNRs are identified on the LDP Constraints Map, rather than on the proposals map. PPW (2011) and LDP Wales specify the need for local and national natural heritage designations to be clearly identified on the LDPs Proposals Map (Representation No 10D.291)**

**(15) Policy M4.1 - Concerns over the impact of any development on natural heritage interests given the extent of biodiversity and geodiversity interest at proposed Preferred Area Trefil quarry and its proximity to BBNP (Representation No 10D.296)**

At a meeting held between CCW, BGCBC and Harmers on the 27<sup>th</sup> October 2011 Harmers suggested an amendment to the Preferred Area. These changes were to take account of geological formations to the east of the site, biodiversity interests, visual impact and the boundary with BBNP. Further to the meeting CCW have suggested that they now wish to object to the site. Due to the timing of this and the fact that no formal notification had been received it was proposed that the amendment to the boundary is a more appropriate boundary and should be considered through the focussed change consultation (FC13.A).

**Signed:**



Lynda Healy  
Development Plans Manager  
Blaenau Gwent County Borough Council  
31<sup>st</sup> January 2012



Richard Jones  
Countryside Council for Wales  
31<sup>st</sup> January 2012

**APPENDIX 1 – BLAENAU GWENT AND COUNTRYSIDE COUNCIL FOR WALES AREAS OF AGREEMENT TO THE DEPOSIT LOCAL DEVELOPMENT PLAN**

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
187	Objective 3	Concerns raised regarding the realistic delivery of the level of housing proposed, and based on past completion rates is concerned that it doesn't meet Test of Soundness CE2	This is dealt with under rep. No. 210	Please see comments to Rep. 210
193	Obj 9	Although supporting the aims of delivering employment opportunities for local people, concerns raised about the reality of delivering 50has of employment land during the plan period, and whether objective 9 meets CE2	<b>Disagree.</b> It is accepted that the employment land figure is challenging but unless the Council plans to meet this figure the area will continue to decline. Evidence collected through the plan preparation identifies that job prospects are considered of primary importance and in most need of improvement in Blaenau Gwent. Based on this, the Council has taken into account growth in the working age population and the aim to reduce unemployment in identifying future employment requirements. The other issue to note is that a 5.0 ha tract of remediated land has outline planning permission at The Works site for a business hub. The other major source of completions is from the Ebbw Vale North site where some parts i.e. Bryn Serth has planning permission and the other significant parcel of land at Rhyd y Blew are already at pre-	We note the Council's comments

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			<p>application discussion stage. It should also be recognised that the following factors will assist in delivering the 50 ha of employment land:· The new Convergence Programme of EU funding 2015-2020 which is likely to provide funding for business property development · The recent designation of Blaenau Gwent as an Enterprise Zone with a combination of measures and funding which will prove attractive to businesses· Major improvements planned for the A465 Heads of the Valleys Dualling which will improve connectivity for the area. It will run through Rassau Industrial Estate and is therefore very close to some of the employment designations.</p>	
205	SP1	<p>Emphasis on regeneration and growth in Northern Corridor giving perception that the Plan is all about development not sustainability. No reference to natural environment i.e. 2 SINCs in Northern Corridor.</p>	<p><b>Agree.</b> Para 6.6 amended (see FC5.B)</p>	<p><b>Agree</b> to the proposed focussed change (FC5.B)</p>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
207	SP2	Suggests improved wording for criterion (f) of SP2. It should be amended to read ' by protecting and enhancing the built heritage and natural environment'	<b>Agree.</b> SP2, criterion f amended (see MC.5)	<b>Agree.</b> We consider that the proposed changes meets ToS CE1.
210	SP4 & SP5	Concerns regarding the proposed level of housing provision and its delivery during the plan period. Annual average completion rate from 1980 - 2009 was 140 units but 244 units required per annum to meet target of 3,666 houses for LDP period	It is accepted that the housing level is challenging but unless the Council plans to meet these higher levels the area will continue to decline. It should be noted that until 2006 the area had seen very little in the way of completions from RSLs, this picture has now changed and RSL's are now more active in the area. If this trend continues and private sector housing completions reaches former levels then the area should see a marked increase in completions. Another point to note is that the higher completion figures were achieved when the Council released the former Garden Festival site in the 1980's; the release of 'The Works Site' should have a similar impact on housing completion rates. Large tracts of remediated land at 'The Works' are ready to be released on a phased basis. The other major source of completions is from the Ebbw Vale North site where some parcels are already at pre-application discussion stage. If the Council does not aim for the higher figure then it will be planning to fail in terms of addressing the declining population and its	<b>Noted.</b>

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			<p>associated problems. The Plan has had regard to national policy in setting the overall housing requirement, the officers have worked with neighbouring authorities, and the figure is considered to be deliverable.</p>	
212	SP7	<p>To ensure that developments for renewable and low carbon technologies do not cause undue harm to the natural and built environment, it is recommended that 'appropriately located' is inserted before 'renewable' in criterion 1a. (To meet ToS CE1).</p>	<p><b>Disagree.</b> Policy DM5 – Low and Zero Carbon Energy is the development management policy which ensures that renewable and low/zero carbon energy technologies are appropriately located.</p>	<p><b>Agree</b> Given the improved clarity to the Plan provided in the proposed change to Rep.224</p>



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218	SP10	To provide greater clarity to the text 'compensatory provision equivalent....' in the 9th line should be amended to read 'compensatory provision equivalent in value to that lost...'. (To meet ToS C2)	<b>Agree.</b> Paragraph 6.68 has been amended (See FC5.E)	<b>Agree</b> We consider that the proposed change meets Test of Soundness C2.
223	SP13	Given that national policy seeks to minimise the amount of waste being generated, such a high allocation of land (above RWP requirement) appears to contradict national policy, and be contrary to Test of Soundness C2.	<b>Disagree.</b> The idea that a high level of land for waste recycling facilities contradicts national policy is incorrect. The availability of land will not create waste generation, as in determining any future planning application Policy DM21 requires there is a proven local and regional need for any facility. The Plan is required to provide 4ha to accord with the Regional Waste Plan requirement for land to meet the needs of more than one authority. The site identified has been selected as part of the HoV organics project to be offered as an optional site for use for a facility(ies). It should be noted that the indicative developable area is 4.6 ha which is only slightly above the 4ha the Plan is required to make available. It should be noted that there are other requirements for sites for waste management facilities such as the need to relocate existing waste transfer businesses which the Plan needs the flexibility to address.It should also be noted	<b>Agree</b>

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			that the land is also identified for general employment use under policy EMP1.6 and if not required for a waste management facility can be used for B1, B2, B8 and appropriate Sui Generis uses in accordance with EMP1.	
224		Statement contained in paragraph 7.3 should be located for clarity (and to meet Test of Soundness CE1) nearer the start of the LDP in section entitled 'How to use this document'	<b>Agree.</b> Delete paragraph 7.3 in the Development Management Chapter and relocate to Chapter 1.0 to appear as the first paragraph under the How to Use this Document section	<b>Agree</b>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
242	DM15	Welcomes its general intention but recommend, for improved clarity, that the second sentence of this paragraph is amended by inserting at its start: "Proposals which are likely to have a significant effect on"	<b>Agree.</b> Para 7.82 amended (see FC5.G)	<b>Agree</b> We consider that the proposed change meets Test of Soundness CE1.
248	DM19	Paragraph 52 of the Minerals Planning Policy Wales (2001) also identifies nature conservation as an appropriate after-use. This should be reflected in paragraph 7.96	<b>Agree.</b> Para 7.96 amended (see MC.20)	<b>Agree</b> We consider that the proposed change meets of Test of Soundness C2.
251	DM21	Recommends that criterion 6(a) is amended by replacing "alternative transport modes" with "sustainable transport modes" (to meet Test of soundness CE1)	<b>Agree.</b> Policy DM21 criterion 6a amended (See MC.21)	<b>Agree</b> We consider that the proposed change meets Test of Soundness CE1.

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252		<p>The plan contains no policies on landscape Protection and enhancement; Historic landscape, or developments in proximity to the BBNP and no logical flow from the plan's vision through to its policies, or recognition of cross boundary issues -</p>	<p><b>Disagree.</b> There is already a policy in the LDP which deals with the protection and enhancement of the Natural Environment. This covers the landscape (including historic landscapes) of Blaenau Gwent. Policy SP10 Protection and Enhancement of the Natural Environment states that ...' designated landscapes will be protected and, where appropriate, enhanced'. It is acknowledged that there was no specific reference to BBNP previously in the Deposit Plan but policy SP10 paragraph 6.66 has been amended (see below) to refer to BBNP in response to another representation (46D.44). Designated landscapes include local designations such as Special Landscape Areas as well as national designations such as national parks. Relevant authorities have a legal duty under section 62(2) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated. Thus any development within Blaenau Gwent should not have an unacceptable impact on the setting of Brecon Beacons National Park which is in close proximity. It should be noted that objective 12 has been amended (see below) in response to another CCW representation (10D.184) regarding a failure for the objectives failing to flow logically overall from the plan's Vision. "The valuable landscape and natural heritage of Blaenau Gwent has</p>	<p><b>Agree</b> Subject to the focussed changes being taken forward, we consider that landscape is addressed in various parts of the plan.</p>

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			<p>been protected, enhanced and managed. Together they have helped foster sustainable tourism and promoted community pride.” Cross boundary issues have been addressed in the Plan. This is evident from the amendment made to SP10 paragraph 6.66 as explained above. The cross boundary issue regarding SLAs is recognised and is now explained (see below) in paragraph 8.73 of policy ENV2 Special Landscape Areas: “Brecon Beacons National Park do not identify any Special Landscape Areas. Blaenau Gwent’s SLA boundaries match Caerphilly’s SLAs and VILLs but do not reflect those identified in Torfaen as they used a different approach by relying entirely on LANDMAP. Although Blaenau Gwent used LANDMAP it supplemented this with additional local criteria.”</p>	
257	MU1	<p>Significant reduction in the area of green open space at N.W wedge of Ebbw Vale as a result of allocations MU1, EMP1.8 and T6.1. 1 has the potential to impair ecological connectivity. Inconsistent with policies DM15 and DM16.</p>	<p>Following a meeting with CCW it has been agreed that the green wedge will be widened in this area. It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, EMP1.8, EMP1.5 and T6.1. These changes together with the wording changes being suggested to MU1 addresses the concerns raised by CCW (See FC10.B)</p>	<b>Agree.</b>

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258	MU1	Concerned about the potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC into countryside to the W & S of Ebbw Vale	<b>Disagree.</b> Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. The change requested is therefore not appropriately located in this table. This issue is to be addressed in the survey requirement table where we identify that a project level HRA will be required.	We welcome the proposed changes to Chapter 9 to clarify the need for a project level HRA.
259	R1.1	In combination with the Rhyd y Blew SINC, the site provides an important link within the area for ecological connectivity. Concerns raised about cumulative loss of connectivity resulting from this and the proposed allocations MU1 and EMP1.8.	<b>Disagree.</b> This issue is to be addressed in the survey requirement table where we identify that a project level HRA will be required.	We welcome the proposed changes to Chapter 9 to clarify the need for project level HRA.

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260	H1.6	Concerns regarding the potential loss of this urban green space (H1.6) and the connectivity it provides within the area, and considers that the allocation is contrary to Test of Soundness CE1.	Policy DM16 'Protection and Enhancement of the Green Infrastructure' will serve to protect and enhance the Green Infrastructure including connectivity between green spaces. The Green Infrastructure includes natural green spaces such as this development area. Whilst some open space will be undeniably lost in the event of this development the connectivity will remain because of the embankment, which acts as a green corridor. The Sites Description document explains that the broadleaved woodland to the west of the site needs to be protected and buffered as it provides an ecological corridor. Further information on the Green Infrastructure is available in the Environment background Paper.	<b>Agree.</b>
262	H1.15	Any development at H1.15 should protect the integrity of the Six Bells Colliery Site SINC and the detailed design of the development and any open space provision will be critical to its protection.	<p><b>Disagree.</b> Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. At the end of the chapter is a Survey Requirements table which requires a full ecological survey and a biodiversity constraints and enhancement plan as part of any future planning application at this site. Policy DM15 also seeks to protect and enhance sites designated as SINCS or those in close proximity.</p> <p>The level of detail required from the representor is considered more appropriately located within the site</p>	We welcome the intention to update the site descriptions to protect the integrity of the SINC.

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			<p>descriptions document.</p> <p>Agree to update the site description for allocation H1.14, H1.15 and T2.4 to reflect that any development of the site should protect the integrity of the SINC and that the detailed design of the development and any open space provision will be critical to its protection.</p>	
263	H1.18	<p>Recommends that that any development at Hillcrest View should avoid the area of Greenmeadow Farm SINC which is within the allocation boundary. Detailed design of the developments and any open space provision will be critical to protection.</p>	<p><b>Disagree.</b> Since the base date of 2009, the site was granted full planning permission for 22 affordable units in June 2010. A small section, located to the south east of this site is designated as a SINC. The approved scheme avoids development within the SINC designation. However, the site description should be strengthened to reflect that any development of the site should protect the integrity of the SINC and any open space provision will be critical to its protection.</p>	<b>Agree.</b>
264	H1.20	<p>Recommends that that any development at H1.20 should avoid the area of Cefn Bach SINC which the site encroaches onto. The detailed design of the development and any open space provision will be critical to the protection of the SINC.</p>	<p><b>Disagree.</b> As covered in Policy DM15 and the national policy framework, the non-statutory SINC designation should not unduly restrict acceptable development. Compensatory provision will be made equivalent to that lost to the development. The part of the site that is designated as a SINC is a former playing pitch. It is therefore not considered appropriate to state this requirement. However, the site description should be strengthened to reflect that any development of the site</p>	<b>Agree.</b>



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			should protect the integrity of Cefn Bach SINC and that the detailed design of the development and any open space provision will be critical to its protection.	
266	T2.4	Welcomes the extension of the rail link but recommends that the LDP include a provision within 'Chapter 9.0 to protect the integrity of the adjacent River Ebbw Fach SINC, and landscape features which supports its role as an ecological corridor.	<b>Disagree.</b> Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. Policy DM15 also seeks to protect and enhance sites designated as SINC's or those in close proximity. The level of detail required from the representor is considered more appropriately located within the site descriptions document. Agree to update the site description for allocation T2.4 to reflect that the extension of the rail link should protect the integrity of the adjacent River Ebbw Fach SINC and landscape features which supports its role as an ecological corridor.	<b>Agree.</b>

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269	T5 & T6	<p>Recommends that Council ecologists, and Highway Verge Management Plan are consulted, where proposals involve improvement works to existing routes, to ensure there are no adverse impacts on highway verge SINC's and their biodiversity interests.</p>	<p><b>Disagree.</b> Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. The change requested is therefore not appropriately located in this table. It is considered more appropriately located within the site descriptions document. Agree to update the site descriptions for policies T5 and T6 to ensure that appropriate consultation is undertaken with ecologists and the Highways Verge Management Plan.</p>	<p><b>Agree.</b></p>
270	EMP1.5	<p>Concerns about the potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC into the countryside W. of Ebbw Vale.</p>	<p>Following a meeting with CCW it has been agreed that the green wedge will be widened in this area (see FC10.A, B &amp; C). It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, MU1, EMP1.8 and T6.1. These changes together with the wording changes being suggested to MU1 (see FC10.B) addresses the concerns raised by CCW.</p>	<p><b>Agree.</b></p>

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271	EMP1.8	Consider that development at this site & the proposed roadside services (part of allocation 'MU1') will undermine the existing physical separation between Tredegar & Ebbw Vale & increase the potential for & perception of coalescence between them.	Following a meeting with CCW it has been agreed to widen the green wedge in this area. The boundary of the green wedge should be amended to extend to the HoV Road, incorporate part of EMP1.8 employment allocation, an area of open space immediately south of the HoV Road, together with land identified as open space at Bryn Serth. The revised boundary will reinforce the buffer between the two settlements of Ebbw Vale and Tredegar and improve connectivity. The amendments to the employment allocation and green wedge boundary is shown on the Maps 5 and 6 attached at Appendix 3. See FC10B & FC10.C	<b>Agree.</b>
272	EMP1.8	Concerns about cumulative impact from development at allocations; MU1, EMP1.8 and T6.1 on significantly reducing the area of green open space and potentially impairing ecological connectivity EMP1 not consistent with DM15 & DM16	Following a meeting with CCW it has been agreed that the green wedge will be widened in this area (see FC10.A, B & C). It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, MU1, EMP1.5 and T6.1. These changes together with the wording changes being suggested to MU1 (see FC10.B) addresses the concerns raised by CCW.	<b>Agree.</b>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
273	EMP1.8	Concerned about potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 & T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC to area W and S of Ebbw Vale.	Following a meeting with CCW it has been agreed that the green wedge will be widened in this area. (see FC10.A, B & C).It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, MU1, EMP1.5 and T6.1. These changes together with the wording changes being suggested to MU1 (see FC10.B) addresses the concerns raised by CCW.	<b>Agree.</b>
274	EMP2.13	To ensure ecological connectivity, consistent with DM16, it is recommended that any development at this allocation (Cwm Draw Industrial Estate) should avoid the area of woodland within the site.	<b>Disagree.</b> The purpose of policy EMP2 is to protect sites for employment use in line with their status in the employment hierarchy. The sites are therefore not listed within Chapter 9.0 or the site descriptions document. Any future development within the site boundary of EMP2.13 will be subject to the development management policies of the Plan. DM16 and DM17 cover the protection and enhancement of the green infrastructure and trees, woodland and hedgerow. Therefore the suggested amendment is considered unnecessary.	<b>Agree.</b>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
275	EMP2.14	Any development at EMP2.14 (Marine Street Industrial Estate) should seek to maintain the integrity of the adjacent 'Ebbw River South Section' SINC, and retain landscape features which also provide ecological connectivity.	<b>Disagree.</b> The purpose of policy EMP2 is to protect sites for employment use in line with their status in the employment hierarchy. The sites are therefore not listed within Chapter 9.0 or the site descriptions document. Any future development within the site boundary of EMP2.14 will be subject to the development management policies of the Plan. DM15 and DM16 cover the protection and enhancement of the natural environment. Therefore the suggested amendment is considered unnecessary. .	<b>Agree.</b>
276	ED1.2	With reference to policies DM15 and DM16, recommends that any development at 'Lower plateau Six Bells Colliery Site' should avoid the River Ebbw Fach SINC, and ensure that a landscape buffer is retained along the edge of the SINC.	<b>Disagree.</b> The part of the site that is designated as a SINC is the River Ebbw Fach, therefore development is not appropriate in this location. However in terms of providing appropriate landscaping buffering this should be reflected in the site description of ED1.2. The purpose of Chapter 9.0 is to identify the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations rather than specific site requirements such as landscaping.	<b>Agree.</b>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
277	TM1.1	<p>Serious concerns about the proposed environmental improvements and tree planting at Eastern Valley Slopes. 9 SINCS could be lost or degraded as a result of poorly planned tree planting operations. Appropriate buffer zones should be provided.</p>	<p><b>Disagree.</b> It should be noted that this project is being driven by the Countryside Section with input from the Ecologist in recognition of the high ecological value of the land. Ecological surveys have been carried out which have informed the environmental improvements and tree planting at the Eastern Valley Slopes. All woodland planting has now been completed Any future environmental improvements will be carried out to enhance access to the site for educational and recreational purposes and would be subject to ecological surveys to protect the integrity of the SINCS. The value of the SINCS (including the ponds) is well recognised and they will be managed and enhanced.</p>	<p>We welcome the clarification that further works will be subject to ecological surveys, and SINCS will be enhanced and managed.</p>
280	ENV1.2	<p>Concerned at limited northern area of green wedge between Ebbw Vale and Tredegar, ENV 1.2 Designation should be broader &amp; extend further northwards up to the southern edge of the HoV Road (a logical physical boundary) to prevent coalescence.</p>	<p><b>Agree.</b> Boundary of Green Wedge extended (see FC10.A)</p>	<p><b>Agree.</b></p>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
295	M3	<p>Recommends that the LDP states that although outside a site designated for its national or international importance, development can still have a significant impact on such sites &amp; any proposals will need to be considered for environmental impact.</p>	<p><b>Disagree.</b> This policy identifies the areas where coal working is not acceptable. Policy DM19 will be used to guide where coal working may be acceptable and the impact on designated sites will be taken into consideration at this stage. An additional sentence within the reasoned justification of this policy will not improve the soundness of the Plan.</p>	<p><b>Agree.</b> Subject to the retention of DM19 and a clear statement that the Plan should be read as a whole.</p>
297	M4.2	<p>There are a number of issues with the access to the site within Torfaen, which is likely to result in the loss of an area of ancient woodland. Additional detail outlining the constraints of the site more fully is provided in the LDP.</p>	<p><b>Disagree.</b> CCW request that the issues regarding the access of the site which involve the loss of an area of ancient woodland should be covered in the reasoned justification. The reasoned justification makes it clear that the development of this site is dependent on Torfaen granting planning permission although it is accepted that this is one outstanding issue to be addressed there may be other issues which may lead to a refusal by Torfaen County Borough Council. It is therefore suggested that no additional information should be included.</p>	<p>We agree that no additional information is required.</p>

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298		Recommend that the trigger point (in Appendix 1 Objective 12) to consider review of the policy for Indicator 'LI19' should be lowered to a figure that more accurately recognises the significance of biodiversity losses in the County Borough.	<b>Agree.</b> Reduce the trigger point in LI 19 from '-25%' to '-10%'.	<b>Agree.</b>
299		Recommends that the trigger point to consider review for Indicator 'LI20' should be amended to:- any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010.	<b>Agree.</b> Delete 'no trigger' and replace with 'any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010''	<b>Agree.</b> We consider that the proposed change meets Tests of Soundness C2.