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Blaenau Gwent

County Borough Council

Regeneration Division

Local
Development
Plan
Issues Paper

July 2007

Looking Beyond 2006 – Key Issues

INTRODUCTION



The Blaenau Gwent Local Development Plan is a statutory plan that will set the strategy and policies to guide development and use of land and to safeguard the environment up to 2021. It will be prepared over the next 4 years, in consultation with stakeholders and the general public, in accordance with the Delivery Agreement.

The Issues Approach

This Issues Paper is the first step in preparing the 'Preferred Strategy' for the Local Development Plan. It is a discussion document intended to promote debate focused on the issues of strategic significance. From an analysis of information on national, regional and local trends and policies, a number of potential issues begin to emerge. These are identified in a way that will inform discussion and decisions on strategic options.

Your Role

The Issues Paper sets out a range of issues and series of questions considered relevant to the future planning of the Borough.

The feedback from this stage will enable the Council to clearly identify the issues relevant to the Borough and develop possible visions, objectives and options for development.

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What Happens Next?

The next stage will be to firm up these issues and look at options in terms of addressing them. A consultation exercise will take place in Autumn 2007 where an in-depth local engagement exercise will focus on local stakeholders; discussing and developing a vision, objectives and options that can address the identified issues.

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1. BACKGROUND

AREA PROFILE

Blaenau Gwent County Borough is situated in South East Wales. It is 20 miles north of Newport and 30 miles north of Cardiff, borders the Brecon Beacons, and is well placed to take advantage of the Heads of the Valleys road network. Most of 70,600 population and 29,585 households (2001 Census) can be found in the towns of Abertillery, Brynmawr, Ebbw Vale Nantyglo and Blaina, and Tredegar.

The Index of Multiple Deprivation (2005) indicated that 26% of the lowest standard output areas (LSOAs) fall within the 10% most deprived in Wales. Nearly 90% of the lowest standard output areas fall within the 50% most deprived in Wales.

There are above average LSOAs for:

- Employment (32%)
- Overall deprivation (26%)
- Health (23%)
- Income (19%)

Below average numbers of LSOAs for:

- Environment

No LSOAs for

- Housing
- Geographical Access to Services

More detailed information on the area is provided in the following sections on: housing; employment; town centres; transport; the environment; and Leisure, Recreation and Tourism.

POLICY CONTEXT

The Blaenau Gwent Local Development Plan must have regard to current national and regional guidance and will be influenced by a number of other national and regional policies and initiatives.

National Policy

Local planning authorities are required, under the Planning and Compulsory Purchase Act 2004, to undertake their functions with a view to contributing to the achievement of sustainable development.

The Welsh Assembly Government also has a duty under the Government of Wales Act 1998 to promote sustainable development in the exercise of its functions. Both the Assembly's Sustainable Development Scheme and the UK Government's Strategy (DETR 1999) stress that working towards sustainable development means pursuing four broad objectives at the same time:

- Social progress which recognises the needs of everyone;
- Maintenance of high and stable levels of economic growth and employment;
- Effective protection of the environment; and
- Prudent use of natural resources.

The Assembly Government's national land use planning policies are set out in Planning Policy Wales and Minerals Planning Policy Wales supplemented by Technical Advice Notes (TANs), Circulars and Ministerial Interim Policy Statements. These include guidance in relation to areas such as, renewable energy, affordable housing, and transportation.

People and Places: The Wales Spatial Plan

Local authorities in Wales must have regard to the national policy framework outlined above, as well as the Wales Spatial Plan. This document attempts to integrate the spatial aspects of national strategies; including social inclusion and economic development, health, transport and environment policy, and seeks to translate into practice the Assembly's sustainable development duties.

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The Wales Spatial Plan provides a framework for the future spatial development of Wales. Blaenau Gwent, along with neighbouring authorities, has been identified as part of the South East – Capital Network Zone. The vision for the Capital Network is:

"An innovative skilled area offering a high quality of life – international yet distinctively Welsh. It will compete internationally, be increasing its global viability through stronger links between the Valleys and the coast and the UK and Europe, helping spread prosperity within the area and benefiting other parts of Wales."

The strategy for the Wales Spatial Plan for the Capital Network is:

- To strengthen and reintegrate the existing system of towns and cities within South East Wales so that the area functions as a coherent urban network, and can compete internationally. Integrated transport is crucial to this; and
- To work with our partners to develop an ambitious programme of joined up regeneration action along the Heads of the Valley corridor which will complement the upgrade of the A465. The aim of this will be; to improve the quality of life, retain and attract residents, and increase prosperity of the whole area focusing, initially, on unlocking the potential of Merthyr Tydfil and Ebbw Vale.

Further work is being undertaken to identify the actions required to enable South East Wales to function as a city region. One of these key projects is intended to provide a regional context for the development of LDPs by providing:

- An agreed role and function for settlements

- An agreed definition of strategic sites for the area
- The identification of areas where strategic development is required.

The outcome of this work is due later in 2007.

Heads of the Valleys Strategy

'Heads – We Win' is the consultation document for the Strategic Framework for the development of the Heads of the Valleys area.

The vision of the Strategic Framework is that, by 2020, the Heads of the Valleys area will be:

- A culturally rich, dynamic network of vibrant, safer communities;
- A place where people want to live, work and play-with a sustainable, high quality of life and a thriving population;
- Helping to drive the success of South East Wales as an internationally recognised Capital Region.

This was followed in June 2006 by 'Turning Heads.... A Strategy for the Heads of the Valleys 2020'. The strategy builds on the framework and provides a context for regenerating communities in Blaenau Gwent. The focus of the strategy is on 5 priority themes;

- An attractive and well-used natural, historic and built environment;
- A vibrant economic landscape offering new opportunities;
- A well-educated, skilled and healthier population;
- An appealing and coherent tourism and leisure experience; and
- Public confidence in a shared bright future.

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LOCAL POLICY CONTEXT

Blaenau Gwent Community Plan 'proud past, bright future' 2005-2009

The Community Strategy provides the overarching strategic framework for all other plans and strategies for the local authority. Local Development Plans should express, in appropriate land use planning terms, those elements of the Community Strategy that relate to the development and use of land provided that they are in conformity with national and international policy obligations.

The Community Strategy sets out the vision of making Blaenau Gwent a better place to live, work and visit. The plan aims to develop new ways of working by building partnerships with local communities, voluntary and business sectors, the local authority and other agencies in order to change the areas and meet community needs and ambitions.

The Community Plan identifies key action areas and aims:

Regeneration: Through partnership and participation we will work to deliver improvements in jobs, the environment and communities.

Health, Social Care and Well-being: Working together to improve the well-being of all people living and working in Blaenau Gwent.

Lifelong Learning: To offer people of all ages engaging learning opportunities for leisure and work.

Environment: To protect and enhance the environment to meet the needs of present and future generations.

Housing: To ensure that quality affordable accommodation is available within sustainable communities for all residents.

Transportation: To provide a sustainable/reliable and safer transport network.

Culture and Sport: Through partnership we will promote cultural and sporting opportunities for all.

Each key theme identified has; key projects, key strategies and a monitoring body. A list of what is to be achieved, how progress will be monitored, the lead organisation and target dates are also identified for each action area.

The LDP will play an important role in assisting the delivery of many of the projects particularly in regeneration, environment, housing, transportation, culture and sport.

Regeneration Strategy

A Draft Regeneration Strategy for the area was prepared in 2005 using the structure of the Heads of the Valleys Draft Strategy. It identified 11 Action Programmes under 3 Major Themes:

Unlocking the Potential of Our People

Improving Health
Spreading Opportunity
Improving Skills

Unlocking the Potential of Our Places

Benefiting from Housing Renewal
Improving the Built Environment
Making better Use of Physical Resources
Improving the Transport System
Promoting Innovation and Growing Business

Building a Confident Future

Putting the Community First
Improving Awareness
Helping Change Perceptions

An Interim Regeneration Strategy was agreed in 2006. Blaenau Gwent has since commissioned Shared Intelligence to prepare a 10-year Regeneration Strategy for the Borough. This will be completed by September 2007 and will provide an impetus for the area to maximise and fulfil its potential. The Local Development Plan will need to express, in appropriate land use

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terms, those elements that relate to the development and use of land.

Town Centre Action Plans

Town Centre Action Plans have been prepared for each of the Town Centres. These will be taken into consideration in preparing policies and allocations for the Town Centres.

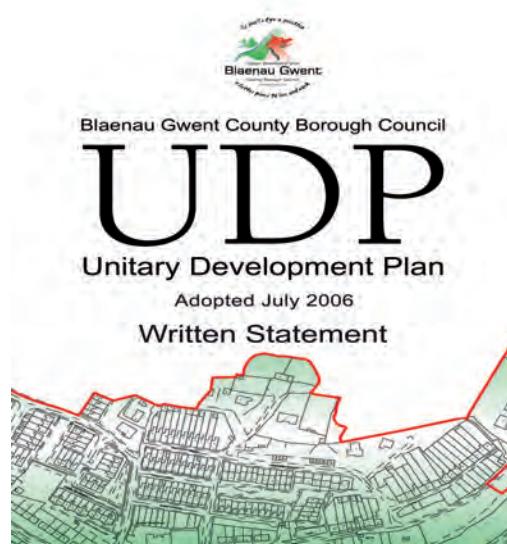
Five Counties Regeneration Framework and Detailed study of Blaenau Gwent

The final reports published in 2002 summarised how best to regenerate the Five Counties Economy and the local economy of Blaenau Gwent. This was supported by the preparation of a more detailed Masterplan by Llewelyn Davies specifically for the Former Steelworks site which included extensive public consultation. The purpose of the master planning exercise was to respond to the significant job losses and turn the site into a vibrant new urban quarter for Ebbw Vale. The Masterplan contained options identifying how the former Steelworks site could be utilised in helping to regenerate Ebbw Vale and contribute towards improving the economic, social and quality of life of the wider community.

In 2005, the Council commissioned further work to review the Masterplan. The new Masterplan has established new standards for sustainability and urban design quality, with the aim of providing an internationally recognised exemplar in this context. This will place Ebbw Vale at the forefront of national, and international efforts to create more sustainable places for people to live work and relax in. In doing so, the Masterplan has sought to create the conditions for a new future for Ebbw Vale, which will benefit not only the town itself but Blaenau Gwent and the wider Heads of the Valleys area.

Proposals for the site include a passenger rail line from Ebbw Vale to Cardiff and Newport, business premises capable of accommodating nearly half a million square feet of office space, development of a new Learning Campus incorporating arts, a Library, Leisure Centre, Theatre, a new Local District Hospital, 720 new homes and refurbishment of the former steelworks general office building.

The Unitary Development Plan



The Adopted Unitary Development Plan sets out a number of objectives which may be relevant to the new Local Development Plan. These are:

- To ensure that development and land use change reflects the principle of sustainable development
- To improve, encourage and safeguard the provision of education, health and social welfare and leisure facilities
- To improve the main north and south routes within the three valleys in the County Borough and the strategic Heads of the Valleys route (A465)
- To safeguard and to enable the introduction of a passenger rail service on the existing railway line from Newport to Ebbw Vale

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- To move towards an integrated land use and transport strategy, encouraging alternative means of travel and transport which have less environmental impact
- To encourage high standards of design in urban and rural environments
- To consolidate and enhance the vitality and viability and attractiveness of existing retail centres
- To protect and manage landscape and implement biodiversity measures
- To enhance and protect the urban and rural environment
- To provide a framework for securing funding and implementation of projects
- To control mineral development in order to meet the industry's needs whilst minimising harm to the environment and local communities
- To encourage the re-use and recycling of materials and achieve waste minimisation

The Local Development Plan needs to include a vision and a set of strategic objectives to guide development in the Borough up to 2021. These need to take account of national and regional planning guidance, and should be influenced by the Community Strategy.

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?

The Local Development Plan will be subject to a Sustainability Appraisal / Strategic Environmental Assessment to ensure that the Plan is sustainable

and has no adverse effect on the environment. The Plan will need to ensure that the principles of sustainable development are taken into consideration in the development and use of land in the Borough.

Question 1.2

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

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2. HOUSING

NATIONAL AND REGIONAL CONTEXT

National Planning Policy

National Planning Policy Guidance in respect of housing provision is contained in the Ministerial Interim Planning Policy Statement (MIPPS) 01/2006, TAN 1 Joint Housing Land Availability Studies and Tan 2: Planning and Affordable Housing.

This new policy advice introduced a number of new requirements for planning in terms of how the authority identifies its housing requirement and how the authority deals with affordable housing.

The Assembly Government's vision for housing is for everyone in Wales to have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families.

The objectives are to provide:

- Homes that are in good condition, in safe neighbourhoods and sustainable communities; and
- Greater choice for people over the type of housing and the location they live in, recognising the needs of all, including those in need of affordable or special needs housing in both urban and rural areas.

Population and Household Projections

The MIPPS states that the latest Assembly Government National and Sub National Household Projections for Wales should form the starting point for assessing housing requirements. Within each region local planning authorities are required

to work together collaboratively, and with appropriate stakeholders as necessary, to apportion to each authority the Assembly Government's household projections, or agree their own regional policy-based projections.

In accordance with the MIPPS the Authority, as part of the South East Wales Regional Planning Group (SEWPG) has agreed to apportion the Assembly Government's National and Sub National Household Projections for Wales (2006), for South East Wales.

The National and Sub National Population Projections for Wales (2005) indicate that there are likely to be a number of significant changes in the profile of the population of Wales and South East Wales for the period up to 2023. The projection forecast that:

- Wales's population will increase by approximately 6% over the next 20 years, reaching 3 million by 2009.
- The population of South East Wales is projected to increase by 7.8% in the next 20 years, a rise of 110,000 in the population.
- The population of people aged between 25 and 44 is set to increase by 6.2 % in South East Wales.
- There will be an increase in the number of people aged 45 and above across Wales, with the largest increase in the oldest age group – 75 and over, reflecting improvements to life expectancy.

The National and Sub National Household Projections for Wales (2006) reflect these projected changes in the population. The projection identifies that:

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- The total number of households is projected to increase by 20% to 1,478,500.
- The number of Households in South East Wales will increase by 22%.
- In general the average household size is expected to continue to fall from 2.34 persons to 2.09.

Affordable Housing

Local Housing Market Assessments are to provide the evidence base to support policies to deliver affordable housing through the planning system. It is now desirable that new housing development should incorporate a reasonable mix and balance of house types and size to cater for a range of housing needs and contribute to the development of sustainable communities. For affordable housing it is now considered important for the authority to have an appreciation of the demand for different dwelling sizes and types of housing in relation to supply, so that they are well informed in negotiating with the required appropriate mix of dwellings on new developments. Local planning authorities are required to include an affordable housing target in the Local Development Plan derived from the local housing assessment and to indicate how the target will be achieved using the policy approaches identified in the development plan.

Regional Context

The Wales Spatial Plan identifies the Valleys as areas that need to be strengthened as desirable places to live, work and visit – combining a wider mix of types of housing and good access to jobs and services – in distinctive communities set in an attractive environment. The aim is to maximise the potential of the A465 corridor. Ebbw Vale is one of the two main towns listed where investment

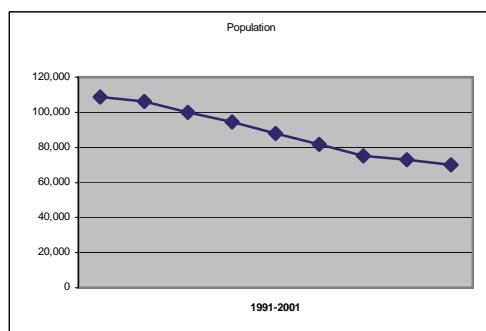
will be targeted to drive regeneration in the Heads of the Valleys area. 'Turning Heads' sees the Heads of the Valleys Programme as offering a once-in-a-generation chance to change the area for better by capitalising on its unique potential and links to the wider region. Housing is one area where opportunities exist and inaction is not seen to be an option.

THE COUNTY BOROUGH PICTURE

The population of Blaenau Gwent has been in decline since 1921. This loss of population was caused mainly by the decline of the coal and steel industries, leading to movements out of the Borough for people to find employment elsewhere. The latest major closure to hit Blaenau Gwent was in 2002 when the Ebbw Vale Steelworks closed.

The Unitary Development Plan aimed to stem this decline and projected that population decline would be halted by 2006 and that by 2011 there would be an increase in population. A comparison between the 1991 and 2001 census results shows that Blaenau Gwent witnessed a 3% population decline between 1991 and 2001 the third highest in Wales, only Merthyr (5.6%) and Anglesey (3.4%) lost more population.

Although population loss is being stemmed the population is lower than forecast by the Unitary Development Plan.



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The latest mid-year estimate for the population of Blaenau Gwent is 68,400 (2005 Mid Year Estimate) down from 70,064 in 2001, which shows that Blaenau Gwent is continuing to lose population. One of the main problems with net outward migration is that it tends to be biased towards those people most mobile and economically active such as those falling into the younger age groups. The problem with this is that both the active labour market and the disposable income that is likely to be spent in the community declines. This leaves an older and less mobile population structure which is more dependent on the provision of social services and health facilities within the area and thus tends to be beyond the capacity of the local community to support such services.

Due to the declining average household size even if the population continued to fall at past rates (reaching 61,782 in 2021) 158 houses would be required to accommodate the population. This is because in Blaenau Gwent the average household size is expected to fall from 2.3 in 2006 to 2.1 in 2021.

Housing Strategy for Blaenau Gwent (2004-2009)

Blaenau Gwent has the lowest owner occupancy rate of all Welsh local authorities (63% of the housing stock). The remainder of the housing is split between 24% Council, 5% RSL and 6% private rented. Nearly 60% of properties are terraced houses, 24% are semi-detached and 9% detached.

An extremely high proportion (93%) of the private rented properties are Pre 1919 and a high proportion (71%) of owner occupied are also Pre 1919. One in 12 houses in the private rented sector are unfit whilst 1 in 5 are unfit in the private sector. The Council is working to regenerate the worst of these areas and have declared

Renewal Areas in Six Bells and Llanhileith.

The Housing Strategy explores the relationship between health and housing as the Council has some of the worst health statistics in Wales, Great Britain and Western Europe. In Wales, Blaenau Gwent records the worst physical health score, the second worst mental health score (Digest of Welsh Local Area Statistics 2003) and the third worst score for the number of persons with limiting long-term illness. Blaenau Gwent also has the second highest proportion of permanently sick and disabled people in Wales.

The 2001 Census identified that Blaenau Gwent had a high vacancy rate well above the national average. The situation has changed since this time and housing professionals are confident that there is no longer an issue with low demand. Although vacancy rates have since reduced there is still an issue with approximately 271 dwellings that are long term vacant. There are also a high proportion of voids in town centres.

The Council is currently looking at options for stock transfer to enable it to meet the Assembly Governments Welsh Housing Quality Standard. This will help raise the standards of the housing and the environment of 24% of the houses in the Borough. It may also provide some opportunities for new development of housing.

Local Housing Assessment (2007)

House prices in Blaenau Gwent have more than doubled since 2002 and as a result of low average wages in the area Affordable Housing is now an issue. The Local Housing Assessment identifies that there is a need for 250 houses per annum over the next 5 years. Of these 66% are for private dwellings, 18% for Social Rented and

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16% Intermediate. The Housing Market Assessment identifies that in the Affordable sector the need is for 1-bedroom dwellings whilst in the private sector the need is for 1, 2 and 4+ bedrooms.

Current Situation:

- Underlying population decline
- Losses of 200 per annum as a result of natural change
- Net out migration in the 0-45 age group
- An ageing population structure
- High proportion of houses built pre 1919
- High proportion of private houses in poor state of repair
- High vacancy rate

Issues for next 15 years:

- The need to stem out migration
- The need to create a more balanced population.
- The unknown impact of international migration patterns
- The implications of Welsh Housing Quality Standard on Council stock
- Ensuring a range of house types are built to meet aspirations and retain residents
- Tackling problem vacant buildings and making the most of voids in the town centres
- Improving the unfitness levels in private sector housing
- Delivering affordable housing solutions

Land position/take-up in the UDP Plan period

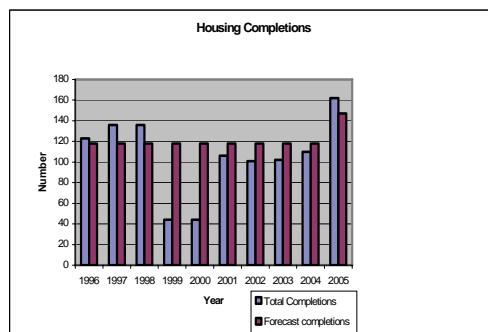
The UDP identified a housing requirement figure of 1,779 houses to be built between 1996 and 2011, that is approximately 118 houses per annum.

Year	Total Completions
1996	123
1997	136
1998	136
1999	44
2000	44
2001	106
2002	101
2003	102
2004	110
2005	62*

* Includes Jan-Apr 2006

From 1996 to 2006 1,064 houses have been built compared to 1,216 houses suggested by the Unitary Development Plan housing requirement figure. The build rate is running at 87% of what was forecast.

Although, to date the completion rate has not reached the forecast figure this is likely to change when the development of the former Steelworks site starts.



ISSUES

Level of Growth

The regional picture is one of population growth whereas the local picture is one of a declining population. There is an opportunity here to make sure that Blaenau Gwent accommodates a share of the population growth. Population decline has negative impacts and allowing this to continue would not be in line with the Wales Spatial Plan or the 'Turning Heads', Strategy for the Heads of the Valleys. Both strategy documents

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identify the area as an area of regeneration.

In line with these key strategic documents Blaenau Gwent proposes to halt population loss and turn it around to a population gain for the authority by the end of the plan period.

One option that is to be put forward as a Strategic Option for growth is a housing completion figure of 200 per annum, which is nearly double what has been achieved in the past but isn't as high as the Housing Market Assessment figure of 250 per annum. In accordance with the MIPPS, Blaenau Gwent has, with the other ten constituent local planning authorities and a broad range of stakeholders (including the Home Builders Federation, utility companies and environmental organisations) given extensive consideration to the issue of regional housing apportionment, and have agreed a figure of 200 for Blaenau Gwent.

Other options may be for a higher level of growth such as the 250 figure identified in the Housing Market Assessment or a lower figure such as the continuation of the UDP figure of 118 houses.

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 as one option for growth? What other options might be put forward?

Location of Development

The current housing strategy sought to make provision for housing in all major settlements within the County Borough. The intention was that the provision of land for residential development would provide housing

choice and opportunity throughout the Borough, and encourage and facilitate existing residents to remain in their local communities.

Blaenau Gwent is characterised by the concentration of its population in urban settlements (the valley towns of Tredegar, Ebbw Vale, Brynmawr, Nantyglo/Blaina and Abertillery). These urban settlements contain a wide range of services and facilities, and have town centres comprising concentrations of retail and commercial premises. The spatial strategy is aimed at concentrating a high proportion of the new housing demand in these centres where they can assist and sustain the regeneration of these towns and also benefit from their close location to the existing services and facilities.

Blaenau Gwent also has settlements that can be classed as peripheral or town extensions which whilst located within the town environs are sufficiently distant from the centre as to not benefit from easy access to the services provided there. These settlements include areas such as Waundeg, Rassau, Garnlydan, Beaufort, Victoria, Waunlwyd, Roseheyworth and Six Bells. The UDP strategy identified housing opportunities within these settlements where there were appropriate sites, easily accessible by public transport, which had potential to sustain or assist the growth of these communities.

The final category of settlement includes small independent settlements, which are too small to support a diverse range of facilities, and are physically separated from existing centres. Such settlements include the villages of Pochin, Bedwelty Pits, Trefil, Cwm, Llanhileth, Bryntithel and Swffryd. Growth in these areas is greatly limited to small expansion based on local need.

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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?

Are some of the third category settlements too small to enable sustainable development? Some of the settlements listed are only hamlets and more work may be needed to identify how growth should be dealt with in these areas.

Question 2.3

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

Another alternative is to concentrate development in and around the main towns where people have best access to jobs, facilities and services, including public transport. Given the new railway line planned for the Ebbw Fawr valley, perhaps most development should be focused in this area. The former Steelworks site, which is in the Ebbw Fawr valley, will be able to accommodate nearly a third of the 3,000 proposed houses if a figure of 200 per annum was taken forward.

Question 2.4

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

Another issue is that some towns may not have sufficient Brownfield capacity to meet local need and may require the release of Greenfield sites.

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?

Creating Mixed and Balanced Communities

One of the main themes of the MIPPS is that the plan should cater for a range and choice of housing to meet local needs and demand. The 'Heads We Win' Strategy aims to provide executive and other high quality and affordable housing to attract professionals and key workers, especially younger buyers and first time buyers. In order to ensure that new development can accommodate a range and choice within a site it may not be appropriate to increase densities by much. It is worth noting that our existing settlement patterns produce some of the highest densities in Wales and to set a high density on all new sites may not enable the Authority to meet these wider needs. Planning Policy Wales encourages higher densities, near public transport nodes or near corridors well served by public transport (or with the potential to be served).

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?

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Meeting the needs of an Ageing Population



The area has an ageing population and even if a growth strategy based around attracting younger age groups is successful there will still be a high proportion of older people in Blaenau Gwent. The authority is already putting in place a strategy for 'Older People' but are there specific policies the Local Development Plan can put in place to support the Council's Older People Strategy?

Question 2.7

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

Improving the design and sustainable credentials of new developments

The quality of the design and sustainable credentials of new developments is an issue that is high on the agenda of the Assembly and also forms an element of the Heads of the Valleys Strategy.

Question 2.8

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

Delivering Affordable Housing

The Housing Market Assessment for Blaenau Gwent has identified that the

Borough now has an affordable housing problem. The UDP included a policy to address affordable housing but this will need to be updated in line with the new TAN 2 advice. One of the key issues is the threshold at which we should ask for affordable housing. The UDP has a threshold of 30 units. Most authorities are now looking to reduce this figure in order to ensure that the affordable requirement is met. In the current UDP 12 out of the 27 sites allocated are below the threshold. If a similar range of sites were allocated in the Local Development Plan this would mean that far more affordable houses could be delivered if the threshold was reduced.

In view of the fact that the Local Development Plan will have to identify the number of houses it is to deliver there is likely to be greater pressure to deliver high percentages if a smaller number of sites are to cater for the need. Therefore one of the main issues in terms of affordable housing is the threshold figure to be adopted in the new development plan.

Question 2.9

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

The other major issue as far as affordable housing is concerned is the target figure that is to be set in the Local Development Plan. The housing Market Assessment states that 34% should be affordable. Is this a realistic requirement given the lack of Social Housing Grant that will be available and the relatively lower land prices that are achieved in the area?

Question 2.10

What percentage of a housing site should be affordable?

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Development Plans are required to include provision of land for schools, further and higher education, places of worship, recreation and other community facilities.

The quality of everyday life is greatly influenced by the nature and extent of local community facilities as local schools, community buildings, and medical services play an important role in the life of an area.

Land is safeguarded in the current adopted Unitary Development Plan for strategic sites such as schools. As part of the Local Development Plan process there is a need to review the allocated sites to ensure that they remain up-to-date with any changing circumstances and development needs.

In addition the preferred option, which is chosen for the population and household projections, is likely to influence the provision of community facilities within Blaenau Gwent. Existing population trends show that Blaenau Gwent has an ageing population. Should this trend continue there could be increased pressure on extra health care facilities for the elderly within the County Borough.

Should the option of attracting a younger migration profile be preferred, it may present an increase in population in the school age ranges. This may result in the need to safeguard additional land in the Local Development Plan for school expansion.

Question 2.11

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

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3. Employment

Maintaining and improving the economic well being of the Borough is important. A thriving economy will help create a better quality of life. The planning system identifies the quantity and location of land required for employment development, seeking to locate employment development closer to where people live and close to good public transport routes. It also has an important function in balancing economic needs with environmental considerations so that the environment is protected.

NATIONAL AND REGIONAL CONTEXT

National Planning Policy guidance in respect of supporting the economy is contained in Planning Policy Wales (2002).

The Council has a statutory responsibility to ensure that sufficient employment land is available to meet identified need. Paragraph 7.1.7 of Planning Policy Wales states that local planning authorities should ensure that:

- Sufficient land suitable for development for enterprise and employment use and well served by infrastructure is designated for employment to meet both identified and as yet unidentified needs; and that
- New development for enterprise and employment uses is located and implemented in accordance with sustainability principles.

Change in Industry

The last forty years have seen a dramatic change in the national economy. The 1970s and 1980s was a period of economic recession with high levels of unemployment and inflation.

During this period the economy of the South Wales Valleys deteriorated significantly due to the decline in the manufacturing sector particularly the traditional coal and steel industries.

The UK economy has experienced a significant shift in favour of the service sector and technological industries.

Regional Context

The Wales Spatial Plan identifies the Heads of the Valley Corridor as an area to be strengthened as an attractive location for people to live and for development, to help secure more balanced prosperity across the area. The Wales Spatial Plan considers Ebbw Vale to be one of the key centres on the corridor, providing the population size and strategic development opportunities necessary for sustained economic development.

'Turning Heads' sees the Heads of the Valley Programme as offering a once-in-a-generation chance to change the area for the better by capitalising on the unique potential and links to the wider region. However, the report identifies that there are a number of key challenges facing the Heads of the Valley area. There is a shortage of office space and smaller business units in much of the area and existing premises are often too large for SMEs, sometimes remaining empty for considerable periods of time. Many of the more skilled jobs within the area are currently filled by individuals who live outside the Heads of the Valleys, while many residents commute to low-skilled and low paid jobs outside the area.



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THE COUNTY BOROUGH PICTURE

Some employment facts and figures for Blaenau Gwent are given below:

- 70% of Blaenau Gwent's working age population is economically active, compared to around 75% in Wales and a GB figure of 78%.
- The employment rate is only 64% compared with 71% for Wales and 74% for GB
- Average residents earnings are only 77% of the GB figure.
- Compared to one in six in Wales, around one in four of the working age population of Blaenau Gwent have no qualifications

ISSUES

Land Requirement

A total of 12.9 hectares of employment land was developed between 2000 and 2005. This gives an annual take up of 2.0 hectares, according to a recent study commissioned. If this trend were projected forward, without taking other considerations into account, only 30 hectares of employment land would be required over the Plan period.

The UDP allocated 180 hectares of employment land for development for the period of 1996 to 2011. Between 1996 and 2006, 16 hectares of that allocated employment land has been developed during this period. Taking into account that land is needed for waste facilities and that the County Borough is moving towards population growth, should we be looking to reallocate sites that are allocated in the Unitary Development Plan.

Question 3.1
Should we be looking to reallocate sites for employment land? If so, how much land should be retained for employment use?

Type of Employment Land



In Blaenau Gwent, the manufacturing sector accounts for nearly twice the percentage of jobs as it does nationally, and proportionally fewer jobs are in the service sector. However, it is predicted that the decline in employment in the agriculture and manufacturing industry is likely to continue and employment growth will be generated by growth in the service sector. Therefore, the main growth area in employment is likely to be for B1 use, which will require additional office space and business parks.

Question 3.2
What type of employment land is needed?

Protection of Employment Sites

The adopted Plan seeks to protect many of the existing employment areas within the Borough from change of use to other non-employment uses, in order to maintain their attractiveness for business. However, there is often pressure for change of use of such sites to other uses, including retail.

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?

4. Town Centres



Town centres are the ideal locations for a number of different activities, not just shopping. They can provide a central destination for other uses such as leisure, employment and homes.

NATIONAL AND REGIONAL CONTEXT

National Planning Policy

National Planning Policy guidance in respect of planning for retail and town centres is contained in the Ministerial Interim Planning Policy Statement (MIPPS) 02/2005 – Planning for Retail and Town Centres.

The new policy advice places emphasis on enhancing the role and mixed-use nature of town, district, local and village centres and focussing new development within them. Out-of-town shopping is discouraged where it could compete with the town centre and affect its vitality and viability.

The Changing Retail Scene

Change in the retail environment of Britain has been a continuous feature since the mid 1960's, where many town centres have suffered, due to:

- The attractiveness of alternative shopping and leisure facilities in out of town locations;

- The supply system increasingly becoming dominated by multiple retailers in all sectors of the market. This process of change has been particularly evident in grocery and convenience goods and service retailing. Consumers, therefore, no longer shop at the nearest centre offering the types of goods and services required. Instead shopping trips focus on a wide range of good quality products in out of town retail facilities;

- New shopping facilities such as larger shopping outlets, superstores, retail warehouses, retail parks, and sub-regional and regional malls have all added to the retail hierarchy of the UK;
- Changes in consumer expectations and the move towards retailing as a leisure activity; and
- Increased use of the internet as a way of purchasing goods.

Regional Context

The Wales Spatial Plan identifies the Heads of the Valleys corridor as areas to be strengthened as an attractive location for people to live and for development, to help secure more balanced prosperity across the area. The Wales Spatial Plan considers Ebbw Vale to be one of the key centres on the corridor, providing the population size and strategic development opportunities for retailing.

'Turning Heads' sees the Heads of the Valley Programme as offering a once-in-a-generation chance to change the area for the better by capitalising on its unique potential and links to the wider region. However, the report identifies that there are key challenges facing the Heads of the Valleys. In terms of retail, only two towns within the Heads of the Valleys (Merthyr Tydfil and Aberdare) were included in the list of

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the 700 most significant retail centres in the UK, while many people travel to Cardiff for everything except food shopping. Towns in the area need significant investment, as they are often run-down and offer little in the way of entertainment, culture and leisure.

THE COUNTY BOROUGH PICTURE

The County Borough has 5 town centres – Abertillery, Blaina, Brynmawr Ebbw Vale and Tredegar.

All settlements in Blaenau Gwent grew out of the iron and coal mining communities established during the industrial revolution. These communities were close knit with a strong local identity and very self-contained. The economic realities are very different today; large supermarkets have replaced the plethora of small shops while shoppers are increasingly prepared to travel outside their immediate communities to obtain the goods they wish to purchase. Whilst these competing facilities are more accessible to the more mobile members of the community, the impact upon these existing centres is likely to be continued decline leaving less mobile people with less choice. These changes reflect national trends in retail.

To further demonstrate the changes in retailing in Blaenau Gwent, in 1997 Wales first factory outlet shopping centre was opened on part of the former Garden Festival Site, Ebbw Vale.

Running in parallel with these trends is the high vacancy rates that several of the town centres are facing. Further changes in the town centres have seen the reintroduction of residential uses within retail areas both 'above the shop' and in converting retail premises to residential uses.

There is also a risk of the town centres continuing to decline in the face of competition from nearby retail centres outside the County Borough such as Cardiff, Newport, Merthyr, Blackwood and Abergavenny.

Town Centre Action Plans have been prepared for each of the town centres and progress has been made in improving the environment particularly in terms of shop fronts, parking and pedestrianisation schemes. Improving Town Centres is seen as a key way to improve the image and regenerate the area. Funding for such schemes is to be made available by the Welsh Assembly Government through the Heads of the Valleys Programme. Town Centre Managers have recently been appointed by the Council to co-ordinate the efforts, resources and interests of all stakeholders to enhance the attractiveness of the Town Centres and to promote them as vibrant and safe places.

ISSUES

Roles and Hierarchy of Town Centres

To rediscover the potential of town centres, it is useful to identify appropriate roles or functions for each centre. This may mean looking beyond retailing to develop other, equally important roles.

Question 4.1

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

A survey of all ground floor units in the 5 town centres of Blaenau Gwent has been conducted. Some of the town centres are performing relatively well, with a lower than national average vacancy rate, while others have a vacancy rate which is more than double the 10% national average.

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Question 4.2

Should we look to identify which towns have the most potential for retail? Should we look to reassess the retail hierarchy and retail boundaries for the town centres?



Current plan policies focus the shopping, commercial, cultural, social and leisure activity in town and local centres and are the priority locations for environmental improvement and enhancement.

Question 4.3

How can we promote vibrant and vital town centres?

Mixed use developments, for example combining retailing with entertainment, restaurants and housing promote lively centres as well as reducing the need to travel to visit a range of facilities.

Question 4.4

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

Question 4.5

Does the plan need to identify additional retail space? If so where should it be located?

Protecting Local Neighbourhood Centres

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.

Question 4.6

Should the plan aim to protect local shopping facilities?

Need for more Retail Space

The Unitary Development Plan allocated 11.65 hectares of land for office/retail development to be built between the period of 1996 and 2011. From 1996 to 2006, approximately 50%, that is 5.85 hectares of the allocated retail and office land was developed.

5. TRANSPORT



NATIONAL AND REGIONAL CONTEXT

National Context

Planning Policy Wales (March 2002) and TAN 18: Transport provides the national planning policy context for Wales. In responding to the challenges of creating an efficient and sustainable transport system for a modern, prosperous and inclusive society, integration is recognised as the key.

To improve accessibility, build a stronger economy, improve road safety and foster more sustainable communities the answer is seen to be integration:

- Of transport and land use planning;
- Between different types of transport;
- Of transport policy with policies for; the environment, education, social justice, health, economic development and wealth creation.

Regional Context

The Wales Spatial Strategy for the South East area aims to strengthen and reintegrate the existing system of towns and cities within South East Wales so that the area functions as a coherent urban network, and can compete internationally. An integrated transport system is seen as crucial to achieving this.

Another area where transport is to play a major part is the ambitious programme of joined-up regeneration action along the Heads of the Valleys corridor, which will complement the planned upgrading of the A465. The aim of this will be to improve quality of life, retain and attract residents, and increase the prosperity of the whole area focussing initially on unlocking the potential of Merthyr Tydfil and Ebbw Vale.

The Wales Spatial Plan area actions for South East Wales, state that the integrated transport strategy for the area will:

- Target improved bus, rail, inter-modal and park and ride services and facilities for commuting to provide real options and reduce dependency on the car;
- Provide incremental improvements to rail services in the Valleys, which will double and in some cases quadruple the capacity;
- Increase the transport capacity of the corridors and gateways to Europe and beyond, including capacity enhancements on the M4 and A465 corridors through the Trunk Road Forward Programme as well as development of routes from Cardiff International Airport.

The Transport (Wales) Act 2006 gives the Assembly the powers to require local authorities to work together on a regional basis. The Act also allows the Assembly to require local authorities to prepare a Regional Transport Plan (RTP) to replace the earlier individual Local Transport Plans. The Regional Transport Plan for this area, is being produced by the consortium of 10 local authorities within Sewta (the South East Wales Transport Alliance). The Plan's outline vision is:

"to provide a modern, integrated and sustainable transport system for South East Wales that increases opportunity, promotes prosperity and

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protects the environment; where public transport, walking, cycling and sustainable freight provide real travel alternatives”.

The Plan's Strategy has five cornerstones:

- Reducing the demand to travel through better land use planning and local service provision;
- Providing safer neighbourhoods for people to live in and to walk and cycle;
- Providing a much improved public transport system for medium and longer distance travel;
- Getting the best out of the existing highways, particularly the core highway network;
- Working with others to seek joint solutions to problems.

THE COUNTY BOROUGH PICTURE

Current Position

- There is currently no rail service in Blaenau Gwent (rail link to Cardiff due to open 2007)
- The average number of cars per household is the lowest in Wales
- The car is the main mode of transport for journeys to work (80%)
- 64% of work journeys are within Blaenau Gwent
- 22% of Blaenau Gwent's workforce travel from outside the Borough
- There is a comprehensive bus service throughout the day although evening and Sunday services are poor
- There are limited facilities for walking and cycling

Issues for the Plan period

- To improve access to services facilities and employment,

particularly by public transport, walking and cycling

- To provide a transport system that increases the use of sustainable modes of travel.
- To reduce the demand for travel
- To provide a transport system that encourages healthy and active lifestyles, is safer and supports local communities.
- To make better use of the existing transport system
- To improve the transport system to assist in the regeneration of the area.
- To reduce emission of greenhouse gases and air pollution from transport

Land position/take-up in the UDP

The major highway schemes identified in the Unitary Development Plan were: the dualling of the A465 Heads of the Valleys Road; Park and Ride Facilities in relation to the re-opening of the Ebbw Vale - Newport / Cardiff passenger railway line; A4046 Cwm-By-Pass and A4046 Ebbw Vale Town Centre public transport improvements.

To date the Cwm-By-Pass has been completed, the reopening of the rail line is imminent and the Dualling of the Heads of the Valleys road has commenced.

ISSUES

Spreading the benefits of regeneration through integrated transport

The main issue in terms of transport is how the transport system can ensure that the whole area benefits from the new rail link to Cardiff/Newport. The other main issue is to ensure that the whole borough has good access to the new facilities to be provided at the former steelworks site, such as the hospital, college, leisure centre, theatre and employment. These two

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issues can be addressed as one given their close proximity.

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?

Improving Accessibility

Lack of access to a car denies a person anything like the mobility afforded to the car driver. Addressing this huge disparity of social exclusion should be one of the main objectives of this Plan. Also many areas within Blaenau Gwent suffer from the negative impact of the increasing car use, such as car parking problems and high pedestrian accident rates. The Council needs to improve accessibility, encourage greater use of sustainable modes of travel that will lead to a reduction in car use.

Question 5.2

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



Improving Connectivity

Connectivity is a main theme in terms of the Wales Spatial Plan and the need to improve regional and local connectivity and accessibility, especially by sustainable modes of

travel, is key to the successful regeneration of Blaenau Gwent. The dualling of the Heads of the Valleys Road and the proposed rail service will no doubt improve connectivity to the wider region and beyond and should bring with it economic reward. But there are more local issues in terms of the connectivity of the area with the mid-valleys area and south to the M4, Cardiff and Newport. Although good progress has been made, there are still a number of improvements needed in the south of the Borough such as the A4048 between Tredegar and Blackwood; the A4046 between Cwm and Aberbeeg; and the A467 from Abertillery to Aberbeeg. There is also an issue of ensuring that more people have access to sustainable forms of transport in particular the rail service.

Question 5.3

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

By controlling the location of development, planning policies are able to reduce the need for people to travel and provide opportunities for people to use modes other than the private car.

Question 5.4

How should transportation policies influence the future location of development?

Safer Neighbourhoods for people to Walk and Cycle

There are currently limited facilities for walking and cycling allowing access to employment, services, key leisure and tourism facilities. If the Council is to reduce the need to travel and improve people's health walking and cycling is one area that could play an important

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part. Safe cycle and pedestrian routes could reduce the use of cars for journeys to work, for services and for recreation.

Question 5.5

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

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6. Environment



NATIONAL AND REGIONAL CONTEXT

The Assembly Government's objectives for the conservation and improvement of the built and natural environment as well as biodiversity have to be reflected in the Local Development Plan. This will help ensure the proper protection of designated sites and species and the implementation of international obligations, without imposing unnecessary constraints on development. In the face of heavy pressure for development in 'green areas' it is important to ensure adequate protection is afforded to the natural environment as well as the built environment.

Climate change is high on the political agenda, at the moment, as it affects rainfall patterns and increases the risk of flooding. Due to the topography of Blaenau Gwent there are only very limited areas that are affected by flooding and therefore it is not regarded as a strategic issue but will be dealt with through the allocation of land and a policy in the Plan.

THE COUNTY BOROUGH PICTURE

The County Borough has 57 listed buildings and 1 Conservation Area. There are 7 Scheduled Ancient Monuments of National Importance and 1 site included on the register of Parks and Gardens of historic Interest.

Blaenau Gwent benefits from a good quality environment based upon a strong natural heritage. It has 3 Sites of Special Scientific Interest and more than 60 Candidate Sites of Importance for Nature Conservation. There is also 1 Local Nature Reserve with a further 8 proposed.

ISSUES

The LDP should reflect the Blaenau Gwent Local Biodiversity Action Plan by safeguarding and promoting ecological diversity in its development strategy. It is important that new development should not place undue pressure on the natural environment. Also, it is imperative to ensure that the range of habitats and species present in the County Borough are not further reduced and should, in fact, be increased to provide a more diverse range.

Question 6.1

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

The dramatic and stunning landscape is an important feature in improving the quality of life for local people. Local Landscape Areas and Special Landscape Areas are identified in the Council's Unitary Development Plan. It will be important to continue to protect the landscape of the County Borough.

Question 6.2

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

As development pressure grows in green areas throughout the County Borough the UDP must be examined to determine whether the level of protection given to the countryside is appropriate.

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Question 6.3

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

Green wedges have an important function as they prevent the merging of neighbouring settlements, which would otherwise lose their distinctive identities. Special Landscape Areas are designated as such because it affords protection to the high quality visual amenity they provide.

Question 6.4

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

Protection of Mineral Reserves

Minerals Planning Policy Wales advises local authorise to include policies for the maintenance for non-energy minerals which are currently in demand. Landbanks are determined using average production figures over the previous 3 years and dividing the reserves by the annual average production.

The LDP will address the requirements of the emerging Regional Technical Statement (currently being prepared by the South Wales Regional Aggregates Working Party) by ensuring that a landbank for aggregates is maintained. It will also seek to identify potential resource areas for sand and gravel and high quality hard rock resources. Coal resources will also be safeguarded where viability or reserves can be demonstrated.

The UDP currently identifies Mineral Exclusion Zones, that is areas where mineral extraction will not be permitted, as: sites of or areas designated for protection for nature

conservation reasons; SLA's and Green Wedges; areas of archaeological or historic interest; areas in close proximity to housing, recreational or tourist attractions or where there would be an undue impact on the environment. A buffer zone of 500m is considered necessary in relation to an acceptable distance from the defined urban area for mineral workings.

Question 6.5

Is the UDP approach to identifying Mineral Exclusion Zones acceptable?



Harnessing Renewable Energy Resources

The provision of electricity and heating from renewable sources coupled with energy efficiency and conservation are key elements of the UK energy policy and the Wales Environment Strategy. For Blaenau Gwent the issue is how schemes to harness renewable energy from a range of sources including biomass, anaerobic digestion, wind farms and small hydro schemes can be achieved without impacting on local communities, the landscape and ecological interests. The wider issue of more sustainable use of energy will also need to be considered.

Question 6.6

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

7. RECREATION, LEISURE AND TOURISM



NATIONAL AND REGIONAL CONTEXT

National

Climbing Higher is the Welsh Assembly Government's long-term strategy for sport and physical activity setting out its strategic direction for the next 20 years. Its ambitious targets focus on communities in greatest need. It is a significant part of Health Challenge Wales, a national focus which calls on organisations and individuals in Wales to do more to prevent ill health. Some of Climbing Higher's main aims are to:

- Increase the amount of physical activity to make a massive difference to people's health and well-being
- Help reduce occurrences of conditions such as heart diseases, strokes and diabetes.

From a planning perspective the Welsh Assembly Government also has concerns with the protection of Open Space. To address this they are proposing that an Open Space Assessment is carried out to identify any shortfall/excess of provision in the area.

The Government also recognises that Tourism is a major element in the

Welsh economy and should be promoted. One of the objectives of the *Wales Spatial Plan* is promoting tourism, which respects the environment and cultural heritage.

Regional

The regional perspective is provided by the '*Turning Heads... A Strategy for the Heads of the Valleys*', in which one of the five priority themes is to establish an 'appealing and coherent tourism and leisure experience'. The Strategy highlights the intention that the tourism and leisure sector will play a more significant role in the economic prosperity of the area and some large regional-scale projects, such as the Valleys Regional Park should be promoted.

The priorities in the Regional Tourism Strategy for South East Wales are to develop urban and business cultural and heritage tourism, golf and luxury breaks.

THE COUNTY BOROUGH PICTURE

There are a diverse number of opportunities for recreation, leisure and tourism in the area. These include 4 leisure centres, an Indoor Bowls Centre, several theatres, a country park of regional significance, a cinema, an 18-hole golf course (with a nine-hole course due to be completed in 2008), country walks and playing fields.

The Unitary Development Plan allocated 243 hectares of land for playing fields and other recreational facilities to be built between 1996 and 2011. From 1996 to 2006, approximately 78%, that is 224 hectares of the allocated land was developed. The UDP also earmarked play area facilities for 4 locations (75% have been developed), a multisports centre (completed) and identified 3 sites for rollerblading (all have been developed).

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There are plans for a 44-bed hotel in Ebbw Vale and a driving range and golf course to be built at Bryn Bach Park, Tredegar.

ISSUES

Protection of Open Space

The Welsh Assembly Government is concerned about the protection afforded to open space provision.



Question 7.1

Is there adequate protection to open spaces?

The need for more land for recreation

An increase in leisure time available to individuals and an increase in the variety of recreational pursuits could contribute to the health and quality of life of the local community. Planning Policy Wales charges the planning system with ensuring adequate provision of land (and water) resources for formal and informal sport and recreation. If it is discovered that there is a shortage of recreational land then land should be allocated in the LDP to ensure that the deficit is met.

The Welsh Assembly Government recognises the importance of the setting of local standards of provision instead of the national NPFA standards being applied. Current standards applied by the Council include 1 play area per 250 children aged 0-14; 1 visitor play area per 250 children; 1 MUGA per ward; 1 wheeled sports area per ward.

Question 7.2

Should these local standards be further developed or examined against NPFA standards?

The Location of new facilities

The choice of location for the development of recreation is important because of the need to be close to the population they are meant to serve but also due to the potential threat to the environment and residential amenity.

Question 7.3

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

Tourism can be of great economic benefit to the county borough and will therefore be encouraged where possible. It is important that sufficient land is allocated for tourism in the county borough and the most appropriate sites should be selected.

Question 7.4

In addition to current provision are there additional opportunities for developing tourism within the Plan area? If so, what are they and where should they be located?