

Blaenau Gwent County Borough Council
Cyngor Bwrdeisdref Sirol Blaenau Gwent



**(Updated) Environment
Background Paper**
Papur Cefndirol Amgylchedd
(Wedi'i Ddiweddarau)

Deposit Local Development Plan
Cynllun Adeneuo Datblygu Lleol

UPDATED ENVIRONMENT BACKGROUND PAPER

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1.0 INTRODUCTION

Aim of this Paper

- 1.1 To set out the background and evidence for how objectives, allocations and policies have been identified and developed.

Overview of how this Paper fits into Plan preparation

- 1.2 This paper will provide information for Officers and Members of the Authority, stakeholders, members of the public and the Inspector to help explain the approach taken on the Environment.

Context

- 1.3 The Environment Strategy for Wales (2006) considers that the landscape and its historic character is a reflection of our culture and history and our continuous interaction with the environment and the resources it provides. Our landscapes must provide real places for people to live, work, enjoy recreation and may provide the scenic backdrop that attracts tourism and enhances the quality of life of the people of Wales. The quality and diversity of the natural and historic landscape should be maintained and enhanced.
- 1.4 This Paper aims to set out how the LDP is able to protect, safeguard and develop the natural and built environment of Blaenau Gwent.

The topic paper addresses:

2. **The National Policy Context** for the environment,
3. **The Regional Policy Context** for the environment
4. **Local Policy Context** for the environment
5. **Key Issues in Blaenau Gwent**, which relate specifically to the environment;
6. **Preferred Strategy**, policy in respect of the environment, representations to the Strategy and proposed policy response, and
7. **Draft LDP Policy**, which provides the proposed planning policy context for the environment in Blaenau Gwent.

2.0 NATIONAL POLICY CONTEXT

People, Places, Futures – The Wales Spatial Plan (Update 2008)

- 2.1 The Wales Spatial Plan (WSP) provides a framework for the future spatial development of Wales. Blaenau Gwent along with the neighbouring authorities of Merthyr Tydfil, Torfaen, Caerphilly, Rhondda Cynon Taf, Cardiff, Bridgend, Newport and the Vale of Glamorgan have been identified as part of the South East – Capital Network Zone. The vision for the area is:

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

- 2.3 The importance of the environment is recognised in the 'Valuing our Environment' theme in the Wales Spatial Plan which states that 'The quality of our natural environment has an intrinsic value as a life support system, but also promotes wellbeing for living and working and contributes to our economic objectives. Safeguarding and protecting our natural and historic assets, and enhancing resilience to address the challenges of climate change, will enable us to attract people to our communities and provide the wellbeing and quality of life to encourage them to stay and preserve the foundations for the future'.

Planning Policy Wales (Edition 4, 2011)

- 2.4 Welsh Assembly Government Environment policy is contained in chapters 5 and 6 of Planning Policy Wales (2011). Supplementary guidance in relation to the natural environment is contained in Planning Guidance (Wales), Technical Advice Note 5 – Nature Conservation and Planning 2009 and Technical Advice Note 6 'Planning for Sustainable Rural Communities' (2010). The Assembly Government's objectives for the conservation and improvement of the natural heritage are to;
- *Promote the conservation of landscape and biodiversity, in particular the conservation of native wildlife and habitats;*
 - *Ensure that action in Wales contributes to meeting international responsibilities and obligations for the natural environment;*
 - *Ensure that statutorily designated sites are properly protected and managed; and to safeguard protected species.*
- 2.5 PPW goes on to state that *a role of the planning system is to ensure that society's land requirements are met in ways, which do not impose unnecessary constraints on development whilst ensuring that all reasonable steps are taken to safeguard or enhance the environment. However, conservation and development can often be fully integrated. With careful planning and design, not only can the potential for conflict be minimised, but new opportunities for sustainable development can also*

be created. For example, new development on previously developed land provides opportunities to restore and enhance the natural heritage through land rehabilitation, landscape management and the creation of new or improved habitats.

- 2.6 According to paragraph 5.5.13 of PPW 'Local authorities have a duty to ensure that adequate provision is made for the planting or preservation of trees by imposing conditions when granting planning permission and/or by making Tree Preservation Orders (TPOs)'.
- 2.7 In terms of the historic environment WAG's objectives in this field are to:
- preserve or enhance the historic environment, recognising its contribution to economic vitality and culture, civic pride and the quality of life, and its importance as a resource for future generations; and specifically to
 - protect archaeological remains, which are a finite and non-renewable resource, part of the historical and cultural identity of Wales, and valuable both for their own sake and for their role in education, leisure and the economy, particularly tourism;
 - ensure that the character of historic buildings is safeguarded from alterations, extensions or demolition that would compromise a building's special architectural and historic interest; and to
 - ensure that conservation areas are protected or enhanced, while at the same time remaining alive and prosperous, avoiding unnecessarily detailed controls over businesses and householders.
- 2.8 Paragraph 13.5.1 of PPW explains that the planning system should guide development to lessen the risk from natural or human-made hazards, including risk from land instability and land contamination. The aim is not to prevent the development of such land, though in some cases that may be the appropriate response. Land Reclamation can enable unstable and contaminated sites to be suitable for new development.

Technical Advice Note 5 'Nature Conservation And Planning' 2009

- 2.9 The revised TAN outlines the aims and objectives of the Welsh Assembly Government to promote the Natural Environment, taking into consideration further guidance and the increased importance of the topic area in the interim period since 1996. The document aims to develop an ambitious but achievable vision of the environment, including healthy, functioning ecosystems, a wealth of native wildlife and natural features and the habitats and natural processes on which they will depend. The TAN outlines how this vision is achieved through considering a range of international and national legislation and developing local policy and designations.

European Legislation and Designated Sites

- 2.10 The EC Birds and Habitats Directives, and the Ramsar Convention guided the Conservation (Natural Habitats &c.) Regulations 1994, which has been consolidated and updated by The Conservation of Habitats and Species

Regulations 2010 (the “Habitats Regulations”). This legislation gives protection to European sites (SACs and SPAs) and also protects certain wild plants and animals (European Protected Species)

National Legislation and Designated Sites

- 2.11 National Nature Reserves (NNRs) are declared under Section 19 of the National Parks and Access to the Countryside Act, 1949 or Section 35 of the Wildlife & Countryside Act, 1981. Sites of Special Scientific Interest (SSSIs) are notified under Section 28 of the Wildlife & Countryside Act 1981. Section 40 of the Natural Environment and Rural Communities Act 2006 (NERC) places a duty on all local authorities and other public authorities in England and Wales to have regard to the conservation of biodiversity in exercising their functions (biodiversity duty). Section 42 of this Act places a duty on the National Assembly for Wales to publish a list of the species and habitats of principal importance in Wales. All local authorities must have particular regard to this list when carrying out it's functions, including determining planning applications.

Local Sites

- 2.12 Policies in Local Development Plans should also provide for the protection of Sites of Interest for Nature Conservation (SINCs), Local Nature Reserves (LNRs) and Regionally Important Geological Sites (RIGs). Locally designated sites should be subject to the application of rigorous criteria to ensure their designation is justified on biological or geological grounds. The process of designating and maintaining the sites should be transparent. Where development proposals may affect national or local BAP habitats or species the same principles apply as to locally designated sites above.

Technical Advice Note 6 'Planning for Sustainable Rural Communities' 2010

- 2.13 The revised PPW includes amendments made as a result of consultation on Technical Advice Note 6 (TAN 6) and both documents should be read together

TAN 6 deals with the following issues:

- sustainable rural communities;
- sustainable rural economies;
- rural affordable housing;
- rural enterprise dwellings;
- One Planet Developments;
- sustainable rural services; and
- sustainable agriculture.

- 2.14 One of the key issues that LDPs need to address is how the land use planning system can be used to create sustainable rural communities. PPW and TAN 6 both emphasise the importance of affordable housing in sustainable rural

communities, and that the growth of rural businesses should be encouraged where they do not impact unacceptably on local amenity. In terms of housing the principle of rural enterprise dwellings is established, and the TAN sets out the requirements for second dwellings on an established farm and identifies the need for a rural enterprise dwelling appraisal to support planning applications for new permanent and temporary rural enterprise dwellings in the open countryside.

Technical Advice Note 10: Tree Preservation Orders, 1997

- 2.15 Under the Town and Country Planning Act 1990 (Section 198) Local Planning Authorities are empowered, in the interests of amenity, to protect trees and woodlands by making Tree Preservation Orders (TPOs). As such, any tree or woodland that has a TPO attached to it is legally protected from cutting down, uprooting, topping, lopping, willful damage or destruction without consent from the LPA.
- 2.16 Tree Preservations Orders should be considered where provision should be made for the preservation of trees or woodlands in the interest of amenity (para 14). TPOs should be made where the removal of trees and woodlands whose removal would have a significant impact on the environment and its enjoyment by the public. TPOs cannot be made on bushes, shrubs or hedgerows.

A Living Wales- a new framework for our environment, our countryside and our seas - Consultation document (December 2010)

- 2.17 WAG is developing a Natural Environment Framework, which will have a stronger focus on sustainable land and marine management in Wales and will adopt an ecosystems approach i.e. taking a truly integrated approach to the management of our environment that promotes conservation and sustainable use equitably. The purpose of the framework is to ensure that the true long-term value of ecosystems and their services (for example, food, fuel, clean air and water and social benefits such as recreation) is fully reflected in WAG's decision-making, policies and delivery programmes.

3.0 REGIONAL POLICY CONTEXT

Turning Heads – A Strategy for the Heads of the Valley 2020 (June 2006).

- 3.1 In June 2006, the Heads of the Valley Strategy was launched to help tackle the issues faced by the Heads of the Valleys communities. The Heads of the Valleys Programme area covers the whole of Blaenau Gwent.
- 3.2 The objectives of the programme reflect those of the Wales Spatial Plan in seeking to ensure:
- 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.
- 3.3 **Strategic Programme 2:** A perception Changing Landscape, sets out the aim to develop and implement a number of key strategic landscape-scale environmental enhancements, concentrating on key corridors and gateways such as the Heads of the Valleys Road and Hirwaun. The programme will also seek to protect, enhance and manage the natural and semi-natural environment, its resources and biodiversity.
- 3.4 **Strategic Programme 9:** Linked Local and Regional Attractions and Facilities aims initially to establish the area as a successful day visitor destination, then to encourage its development into a short break location. It is intended to make the most of the existing offer attractions such as Big Pit and some large regional-scale projects, such as a Valleys Regional Park, will be promoted.

4.0 LOCAL POLICY CONTEXT

- 4.1 As a corporate document, the Local Development Plan must have regard to other documents produced by the Council. The relevant documentation in terms of the environment is set out below.

Making a Difference – A Community Strategy for Blaenau Gwent 2010-2030

- 4.2 The Community Strategy builds on the work undertaken by the Community Plan and takes forward the vision of making: Blaenau Gwent a better place to live, work and visit. The Community Strategy has 7 key themes and each theme has its own vision.

 **Lively and Accessible Communities**

Creating communities that people enjoy and want to live in

 **Fair and Safe Communities**

Making people feel safer and included in our communities

 **Healthy Communities**

Helping people to be healthy and get the right care and support when they need it

 **Leading Communities**

Working with, and for our communities

 **Thriving Communities**

Offering the opportunities, support and resources in our communities for people to thrive

 **Learning Communities**

Giving people the skills to succeed

 **Green & Sustainable Communities**

Improving our environment today for tomorrow

- 4.3 Of the seven themes identified in the Community Strategy one specifically relates to the environment. Under the theme 'Green and Sustainable Communities' one of the aims is to protect and enhance the natural environment, which will be achieved by:

- a) Getting people to value and use what we have
- b) Enhancing access to and quality of our parks, open spaces and countryside
- c) Protecting our plants and animals

Draft Healthier Future 3, Blaenau Gwent Health, Social Care and Well-Being Strategy (2011-2014)

- 4.4 Healthier Future 3 is the third Health, Social Care and Well-being Strategy for Blaenau Gwent, developed in partnership between the Aneurin Bevan Health Board, Blaenau Gwent County Borough Council and its partners. The Strategy sets out a continued commitment working together to improve the health, social care and well-being of people living and working in Blaenau Gwent.
- 4.5 This strategy recognizes that the LDP is crucial for ensuring the right facilities and environments are available and developed in Blaenau Gwent to support a range of

activities that improve health and well-being for the local population, for example, leisure facilities. It refers to the growing appreciation of the mental and physical health benefits of the natural environment and that at present we have a rich resource locally, which should be preserved.

Blaenau Gwent Regeneration Strategy and Action Plan (2010) (Draft first revision)

- 4.6 The Regeneration Strategy identifies an overarching aim and six principles along with proposals to translate them into action. The overarching aim is to 'Share Benefits of Regeneration Widely' and this will be achieved by ensuring that the benefits of regeneration are shared by all those in Blaenau Gwent. The six principles are: -

Principle 1: Diversify the Economy and Develop Manufacturing
Principle 2: Boost Business Support and Enterprise
Principle 3: Promote Learning and Modern Skills
Principle 4: Focus Investment in Key Communities
Principle 5: Deliver The Works as a National flagship
Principle 6: Develop the Transport Infrastructure

Principle 1 recognises the opportunity to improve tourism and leisure offer in connection with the natural and built environment and at the Works with the new leisure centre and theatre.

Blaenau Gwent Local Biodiversity Action Plan (LBAP) (2010)

- 4.7 The LBAP has been produced by the Council, as a partner of the Blaenau Gwent Biodiversity Partnership which consists of an alliance of private, public and voluntary groups, organizations and individuals to ensure the national targets for species and habitats, as specified in the UK Action Plan, are translated into effective action at the local level. The LBAP identifies the breadth of important biodiversity that exists in Blaenau Gwent and sets out programmes and actions to ensure their conservation and enhancement. The LBAP will be a key document in providing evidence for locally designated sites.

Supplementary Planning Guidance Biodiversity and Geodiversity (2010)

- 4.8 The purpose of this Supplementary Planning Guidance (SPG) is to assist those submitting and determining planning applications in Blaenau Gwent to ensure that biodiversity, and where relevant, geodiversity, is protected, conserved and enhanced when development is proposed.
- 4.9 The SPG is in accordance with advice set out within national planning guidance and will build on policies in the Council's Local Development Plan and the Local Biodiversity Action Plan for Blaenau Gwent. It will be reviewed in conjunction with future local development plan reviews.

5.0 CURRENT AND FUTURE ALLOCATIONS/DESIGNATIONS

NATURAL ENVIRONMENT

BIODIVERSITY

Special Areas of Conservation

- 5.1 Special Areas of Conservation (SACs) are strictly protected sites designated under the EC Conservation (Natural Habitats &c.) Regulations 1994 (Council Directive 92/43/EEC of 21 May 1992). The UK is bound to the terms of the Habitats Regulations, which are translated into the Wildlife and Countryside Act 1981, as amended by the Countryside Rights of Way Act, 2000. The legislation focuses not only on protection, but also on management.
- 5.2 Planning Policy Wales defines SACs as Statutory Nature Conservation Designations. The Assembly will seek to ensure that the *“international responsibilities and obligations for conservation are fully met, and that, consistent with the obligations of the designation, statutorily designated sites are protected from damage and deterioration, with their important features conserved by appropriate management”* (para. 5.3.9)
- 5.3 TAN 5 highlights the UK’s obligations and international responsibilities to protect statutory protected sites from damage and deterioration, with their important features to be conserved by appropriate management.
- 5.4 In planning law, SACs are afforded the highest possible biodiversity protection. Wales contains 90 SACs or candidate SACs and although none of them fall within the boundary of Blaenau Gwent, several are in close proximity.
- 5.5 Under Article 6(3) of the Habitats Directive and Regulation 48(1) of the Habitats Regulations 1994, a ‘Habitat Regulation Assessment’ needs to be undertaken by law on all European protected sites. ‘Habitat Regulation Assessments’ in essence, assesses the likelihood of significant effect on a site as a result of development, including the cumulative impact of other plans, strategies, allocations or individual development proposals. Where significant effects are identified, alternative options should be examined. It is important to note that the effect of the plan on protected sites outside of the County Borough boundaries also have to be taken into consideration when preparing the LDP.
- 5.6 Capita Symonds was commissioned to undertake a Habitats Regulations Assessment/ Appropriate Assessment (AA) in respect of the Deposit Local Development Plan. Their Screening Report identified the potential for the Deposit Local Development Plan to have a negative impact on 5 European sites identified within a 15km search area around the Blaenau Gwent County Borough Council’s (BGCBC) Planning Authority boundary. The 5 sites identified were Cwm Clydach Woodlands, Usk Bat Site, Aberbargoed Grasslands, Sugar Loaf Woodlands and the River Usk.
- 5.7 The Appropriate Assessment identified that, before the consideration of mitigation measures, **4 European sites could potentially be affected** by the delivery of the

LDP when considered on its own. However, after the introduction of mitigation measures the AA **did not identify any** of the European sites, which could potentially be affected by the delivery of the LDP.

- 5.8 Capita Symonds recommended the inclusion, as an LDP strategic policy, or a clear statement that the proposed LDP and its components will meet the specific requirements of Habitats Directive (Council Directive 92/43/EEC) and will not adversely affect the integrity of the sites concerned.
- 5.9 Policy SP10 was included in the Deposit Plan which protects national, European and international nature conservation sites in line with national planning policy;

Sites of Special Scientific Interest

- 5.10 Sites of Special Scientific Interest (SSSI) are areas of land that have been notified and designated under the Wildlife and Countryside Act 1981 (as Amended) because it contains wildlife, geological or landform features that are considered to be of special importance at the national level. SSSIs are protected to safeguard these important assets for the benefit of current and future generations.
- 5.11 PPW identifies SSSI's as a statutory designated site, which makes a vital contribution to protecting biodiversity. Local Planning Authorities should have regard to the relative significance of national important nature conservation sites. The assembly government will *"ensure that the international responsibilities and obligations for conservation are fully met, and that, consistent with the objectives of the designation, statutory protected sites are protected from damage and deterioration, with their important features conserved by appropriate management."* (para 5.3.9)
- 5.12 TAN 5 covers the requirements associated with SSSIs and their place within the planning system and all development considerations to be taken into account.
- 5.13 The designation of a SSSI does not preclude development on or near the site, as highlighted in PPW (para 5.5.8), TAN 5 (para 21) and Draft Revised TAN5 (Para 5.2.3). However, Local Planning Authorities have a duty to protect the integrity and valuable features of the site under the Habitats Regulations, 1994 and the Wildlife and Countryside Act (as amended), 1981. Where development will have an unacceptable significant direct or indirect impact on the SSSI, the development would not be permitted, unless the reasons for the development clearly outweigh the value of the site itself and the national policies set to safeguard the designation.
- 5.14 The Wildlife and Countryside Act 1981, (as amended) and Schedule 9 to the Countryside and Rights of Way (CROW) Act, 2000 imposes an important new duty on public bodies that require them to take reasonable steps to further the conservation and enhancement of the features for which the site is of special

interest. This gives local authorities more powers to ensure better protection and management of SSSI's and safeguard their existence into the future.

- 5.15 There are two Sites of Special Scientific Interest (SSSI) within the Planning authority boundary:
- Cwm Merddog Woodlands / Coed Ty'n y Gelli
 - Brynmawr Sections (geological site)
- 5.16 The Countryside Council for Wales (CCW) is responsible for selecting and designating SSSIs, which are identified under scientific criteria published by the Joint Nature Conservation Committee (JNCC).
- 5.17 The inclusion of a policy within the LDP that refers specifically to the SSSI is not considered necessary due to the protection it has within national legislation. The inclusion of a policy within the local development plan would be repeating national legislation and guidance.

Sites of Importance for Nature Conservation (SINCs)

- 5.18 SINCs comprise one category of nature conservation designation that are recognised throughout the UK under a wide range of differing titles, and which are collectively known as '*local wildlife sites*'.
- 5.19 SINCs are a non-statutory wildlife site designation covering a wide range of semi natural habitats of substantive value within a regional, county or district context and protecting and enhancing these sites is an essential part of sustaining the biodiversity resource of Blaenau Gwent.
- 5.20 They are found on both public and private land and vary in size and shape, from small ponds to much larger areas of habitat such as ancient woodland, upland, and species rich grassland.
- 5.21 Selection of these sites is a matter for local authorities and local wildlife organisations. Selection takes into consideration the most important, distinctive and threatened species and habitats within a national, regional and local context, making them some of our most valuable urban and rural wildlife areas. Guidelines on the identification of SINCs in South Wales are set out in published scientific criteria '*Guidelines for the Selection of Wildlife Sites in South Wales*' and '*Mid valleys Criteria for the selection of SINCs*' (Gwent Wildlife Trust, 2004 and 2008). They are approved by a Panel of Experts, which includes the Countryside Council for Wales, Gwent Wildlife Trust, SEWBReC, the Blaenau Gwent Biodiversity Partnership, the Council's Ecologist and other bodies.
- 5.22 Over the past three years, the Council in partnership with Gwent Wildlife Trust and the South East Wales Biodiversity Records Centre (SEWBReC) have worked on a major partnership project to identify SINCs across the borough. In November 2009 the Council approved the designation of a first tranche of sites, which had been identified as worthy of protection through ecological surveys as SINCs. In September 2010 a second tranche of SINCs was approved bringing the total of

SINCS to be included in the LDP to 137. Both tranches are shown on the Proposals Map.

- 5.23 The identification and review of SINCS is an ongoing process with sites being identified as and when ecological survey data becomes available. Further tranches of sites will therefore be submitted to Committee as and when the ecological data becomes available and sites are approved for designation by the SINC Expert Panel. As soon as a site has been assessed and qualifies as a SINC under the guidelines, then its status as a SINC will be honoured. It does not necessarily feature in the LDP as a SINC as they can be identified and designated at any time although they will have the same status as those included in the LDP. SINC records will be updated at the first review of the Plan.
- 5.24 SINCS constitute an important ecological resource providing both an important haven for local wildlife and recreational green spaces for the local community to enjoy. River corridors which are designated as SINCS form part of the Strategic Green Infrastructure and other SINCS are part of the Local Green Infrastructure.
- 5.25 In a Borough with a lack of statutory wildlife site protection, (for instance, there are only 2 designated Sites of Special Scientific Interest (SSSIs)) there is a need for greater recognition and increased action for SINCS in order to conserve the County's biodiversity resource.
- 5.26 The designation of these SINCS and their protection ensures that a green network is maintained across the borough. This provides many services, some of which are listed above, benefiting our local community as well as the species and habitats that are found within them. Today the protection of these resources is vitally important, as it will ensure a resilient countryside that can stand up many of the issues facing our society such as a growing population and changing climate.
- 5.27 Since the implementation of the Natural Environment and Rural Communities Bill in 2006, Local Authorities now have a key role to play in the conservation of biodiversity. This is recognised under Section 40, which states:
'...Every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity...'
- 5.28 SINC status is a non-statutory designation (no protection in law) but they will be afforded protection from development under policies DM15 and ENV3 within the LDP. Whilst it is important to protect the biodiversity and geodiversity of these sites from inappropriate development it should be noted that in accordance with national planning policy the designation of non-statutory sites such as SINCS will not preclude appropriate socio-economic activities.

Local Nature Reserves

- 5.29 Local Nature Reserves (LNRs) are designated by Local Authorities under the unique powers of Section 21 of the National Parks and Access to the Countryside

Act 1949 in consultation with the Countryside Council for Wales. They are statutory designated sites of local biodiversity or geological interest which are managed to protect their natural interest and enhance it if possible, and are of particular value for community enjoyment, involvement and education.

- 5.30 The important role of Local Nature Reserves is also recognised in Biodiversity – the UK Action Plan (HMSO 1994) which encourages Local Authorities to make reasonable provisions for Local Nature Reserves and green spaces in local plans and countryside strategies. Local Authorities also have a legal responsibility for delivering biodiversity conservation under the Natural Environment and Rural Communities Bill (NERC) 2006.
- 5.31 PPW states that the designation of LNRs should be based on sound scientific assessment and are considered to add value to the planning process (para 5.3.11).
- 5.32 Local Nature Reserves are identified and designated using the same guidelines and criteria as SINCs, however to establish a LNR the declaring local authority must first have a legal interest in the land concerned, for example, they could own it, lease it or have a nature reserve agreement with the owner. The land must lie wholly within the area, which the declaring authority controls.
- 5.33 Blaenau Gwent County Borough currently has the following 6 LNRs, which are shown on the Constraints Map:
- Silent Valley
 - Parc Nant-Y-Waun
 - Sirhowy Hill Woodlands and Cardiff Pond
 - Cwmtillery Lakes
 - Beaufort Hills pond and woodland
 - Parc Bryn Bach
- 5.34 It is hoped to designate the following five sites (which will be put on the Constraints Map) as Local Nature Reserves by the end of 2012.
- Six Bells
 - Roseheyworth
 - Trevor Rowson
 - Cwmcelyn
 - Garden city
- 5.35 Policy DM15 in the Local Development Plan will seek to maintain, enhance and provide mitigation for any loss to LNRs.

Green Infrastructure

- 5.36 The Welsh Assembly Government recognises the important role of Green Infrastructure in terms of promoting sustainable development. At the heart of the Wales Spatial Plan is 'improving wellbeing and quality of life by integrating social,

economic and environmental objectives in the context of more efficient use of natural resources'. The Wales Spatial Plan is built upon five themes, all of which are supported by Green Infrastructure. The "Valuing our Environment" theme is particularly relevant when considering how the region's green infrastructure can contribute to implementing the Spatial Plan vision for South East Wales. The Valuing our Environment theme focuses on:

- High quality urban living and close proximity to stunning countryside
- Managing development pressures to safeguard and enhance the high quality landscape and countryside
- Sustaining and developing places that are safe for people to walk and cycle, and reducing crime
- Protecting environmentally sensitive areas, such as the Gwent Levels
- Identifying opportunities to manage, restore and create other sites which will safeguard and enhance the area's biodiversity
- South East Wales as a networked environment region.

5.37 Integrating environmental planning into spatial planning is a key aim for South East Wales and the concept of a networked environment region focuses on planning for Green Infrastructure in a similar way to more traditional planning of 'grey' infrastructure such as developing a road network. Recognising that the Green Infrastructure provides essential ecosystem services such as clean water, clean air, good quality soils, pollination and wildlife habitats allows planning for sustainable developments which is the organising principle of the Welsh Assembly Government.

5.38 In simple terms the Green Infrastructure is a network of green spaces and natural elements, which provides multiple benefits for people and nature. It comprises numerous individual components, including open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside. Individually these elements are GI assets and when appropriately planned, designed and managed, they have the potential to deliver a wide range of social, environmental and economic benefits.

5.39 The benefits of Green Infrastructure strategic planning are:

Social:

Green space enhances social cohesion and quality of place through improving the environment of local communities – both key components for sustainable regeneration strategies. It can also result in multiple health benefits through;

- reducing the urban heat island effect through evaporative cooling, shading and providing corridors for cooler air to flow into urban areas
- improving air quality by filtering out pollutants
- providing free, easy opportunities for recreation such as walking and cycling
- helping to reduce stress and improving mental health through enjoyment of open space and nature

- providing safe, easily accessible green routes for walking and cycling
- providing space to grow fresh food.

These contribute to a reduction in obesity levels, stress related illnesses, coronary heart disease and related illness and illness associated with poor air quality e.g. asthma.

CCW's innovative Green Space Toolkit is designed to help local authorities plan and improve natural green areas for people in towns and cities to ensure that people have places to enjoy nature close to their homes, partly because it is so important for physical and mental well-being. The CCW standards have been used to determine the current level of provision of accessible natural green space in Blaenau Gwent and the results are shown as part of the open space assessment in the Leisure Background Paper.

Environmental:

- The conservation and creation of wildlife habitats and corridors, reductions in air and water pollution. Connected GI assets provide the framework within which species migration can more readily occur in response to environmental pressures such as climate change - the river corridors and mountain ridges in Blaenau Gwent act as ecological corridors and have an important role to play. GI assists in combating climate change, for example, if it is well-designed and managed it can encourage people to travel in a more sustainable way, such as cycling and walking.

Economic:

- The tangible benefits that an attractive environment and investment in green spaces brings in terms of attracting and retaining both business and a skilled workforce. Green Infrastructure additionally creates real opportunities for new commercial activity, for instance in tourism, conservation, agriculture and the renewable energy sectors, creating new employment in and around our towns and cities.

5.40 Understanding multifunctionality is central to the GI approach to land use planning. Where land performs a range of functions it affords a far greater range of social, environmental and economic benefits than might otherwise be delivered. An example of a multi-functional green asset in Blaenau Gwent is Parc Bryn Bach, which serves an important environmental role as a Local Nature Reserve and provides an opportunity for recreation in terms of walking and cycling, with corresponding health benefits. As a major tourist attraction in Blaenau Gwent, Parc Bryn Bach also provides a boost to the local economy.

5.41 The regeneration of the Works is an example of a large development where green infrastructure principles have been integrated. For example, the Central Valley Wetland area will provide new pedestrian and cycle routes; open recreational spaces; new grassland and woodland and wetland habitats. It will link the General Offices, which is a grade II listed building, in the north to the lower sidings in the

south, thereby providing an attractive green corridor running through the site. The Green Bridge cycle and walkway will connect The Works to Tŷ Llwyn village.

- 5.42 The benefits of the Green Infrastructure can clearly be seen at the Works as the pedestrian and cycle routes provide the opportunity for recreation with corresponding health benefits and also connect to a local community. They make the historic environment more accessible by establishing a link to the iconic General Offices which plays an important role in the heart of the community, and is now being transformed into a major visitor attraction that will showcase the heritage of the valleys, thereby providing an economic boost. Linear GI (the central wetland area which acts as a green corridor) running through the site is integral in securing connectivity for wildlife as well as accessibility for people.
- 5.43 The Ebbw Vale Sustainable Development Framework has been produced to guide and facilitate the regeneration of Ebbw Vale town centre and the Northern Corridor, in conjunction with the ongoing development of the Works. The Framework identifies a clear opportunity to provide a network of green links between the Northern corridor sites to allow the effective integration of the SINCS and other key habitat areas such as Parc Bryn Bach and the Brecon Beacons National Park.
- 5.44 Connectivity between different GI assets will help maximise the benefits that they generate. This connectivity can be visual or notional; however physical connections make the most impact. Although these individual sites are important in their own right it is the resulting connectedness that brings considerable added value. Policies will be included in the Deposit Plan to ensure there is no loss of connectivity within the Strategic GI (mountain ridges and river corridors) and to ensure that where appropriate development proposals facilitate connections to Strategic and Local GI (including parks, woodland, informal open spaces and nature reserves) as well as creating natural open space to enhance linkages between the GI.
- 5.45 The landscape of Blaenau Gwent is characterised by the mountain masses that are intersected by the three narrow river valleys. It is the mountain ridges and river corridors that form the Strategic GI in Blaenau Gwent. The former are designated as Special Landscape Areas (SLA), and protected under Policy ENV2 whilst the river corridors are designated as Sites of Importance for Nature Conservation (SINCs) and are afforded protection under Policy ENV3. Below this strategic level there is Local GI such as cycle paths, informal open space, parks, other SINCS (i.e. non-river SINCS which are also protected under Policy ENV3) and local nature reserves, which are protected under Policy DM15.
- 5.46 The Valleys Regional Park comprises numerous individual green assets in Blaenau Gwent, including strategic sites such as Parc Bryn Bach, the Works, Bedwellty House and Park and the Garden Festival. An important element of the VRP in Blaenau Gwent is the Ebbw Fach Trail, an 8-mile cycling and walking trail

through the Ebbw Fach valley from Brynmawr to Llanhilleth. It links 13 community green spaces and numerous local heritage sites and environmental sites and is an example of the Green Infrastructure. VRP is an essential component of Blaenau Gwent's Green Infrastructure and acts as a principal delivery vehicle in achieving a networked environment region in SE Wales.

- 5.47 Blaenau Gwent's Green Infrastructure is shown in Appendix 1 and it will be protected and enhanced through Policy DM16.

LANDSCAPE

Special Landscape Areas

- 5.48 Special Landscape Areas (SLA's) are non-statutory designations applied by local authorities to define areas of high landscape importance.

5.49 Landmap

Planning Policy Wales advocates the use of LANDMAP as the formally adopted methodology for landscape assessment in Wales. The Countryside Council for Wales has developed 'LANDMAP', which is a programme that assesses the diversity of landscapes within Wales. It identifies and explains their most important characteristics and qualities – such as an area's geological, ecological, visual, cultural and historic character.

Regional SLA framework.

- 5.50 In March 2007 consultants 'TACP' were appointed by a consortium of south-east Wales local authorities, including Blaenau Gwent, to develop criteria for the designation of Special Landscape Areas (SLAs). **(See report – Development of criteria for Special Landscape Area designation for South East Wales Local Authorities (2007)).** A detailed approach and methodology was discussed and agreed amongst the S.E.Wales group to use the new Landmap aspect area evaluation criteria.

5.51 SLA designation in Blaenau Gwent

In May 2008 Bronwen Thomas Landscape Architect was appointed by Blaenau Gwent County Borough Council to carry out a review of the Special Landscape Areas (SLAs) in the county using the methodology set out in the Countryside Council for Wales' (CCW's) LANDMAP Information Guidance Note 1 – **(see report - Proposals for Designation of Special Landscape Areas in Blaenau Gwent (2009)).** The objective of this study was to identify and justify a revised set of SLAs for use in the Local Development Plan. Planning Policy Wales (Section 5.3.11) states that SLAs should be based on assessment of nature conservation, landscape or geological value of the site, thereby advocating a more holistic approach than the previous assessment for SLAs. Both the use of overall evaluations and of all 35 evaluations have been tested against the *LANDMAP* information for Blaenau Gwent. The resulting Landscape Value maps appear to give a more balanced overview as a basis to define broad search areas. It was identified, however, that the Landmap data was not sufficient alone for providing the basis for identifying the proposed SLAs. In addition to the *LANDMAP* data, the

Development of Criteria report allowed for other more specific or local needs to be identified at stage 1, and therefore included at all later stages.

These local criteria are:

- Prominence,
- Spectacle – dramatic topography and views,
- Unspoilt areas - Pre-industrial patterns of land use
- Unspoilt areas – Remoteness and Tranquility
- Vulnerability & sensitivity to change
- Locally rare landscape
- Setting for special landscapes

5.52 In total 8 Special Landscape Areas have been designated and these are shown on the Proposals Maps. The report 'Proposals for Designation of Special Landscape Areas in Blaenau Gwent (2009) contains a full explanation of how SLAs have been designated in Blaenau Gwent.

Green Wedges

5.53 Green wedges are a local non-statutory designation that primarily prevents the coalescence of individual settlements and maintain important open green spaces between and within settlement boundaries.

5.54 The purpose of green wedges according to Planning Policy Wales (4.7.3) is to:

- prevent the coalescence of large towns and cities with other settlements;
- manage urban form through controlled expansion of urban areas
- assist in safeguarding the countryside from encroachment;
- protect the setting of an urban area; and
- assist in urban regeneration by encouraging the recycling of derelict and other urban land.

5.55 PPW recommends green wedges for inclusion in the LDP where it can be demonstrated that normal planning and development control policies cannot provide the necessary protection (para. 4.7.11).

5.56 PPW provides no specific survey methodology for the designation of Green Wedges and consequently methodology must be defined at the local level. The Council has determined that the purpose of a green wedge is to:

- Protect vulnerable undeveloped land;
- Protect urban form;
- Prevent coalescence between and within settlements, and
- Protect open nature of the land.

5.57 A desk study was undertaken to review each of the 4 green wedges designated in the Unitary Development Plan to determine whether they met the above definition of the purpose of green wedges and were worthy of protection. The study also involved identifying areas of development pressure and reviewing the extent of each existing green wedge.

5.58 The results of the assessment are shown in Table 1 below. It is considered that 2 (Beaufort and Brynmawr; Tredegar and Ebbw Vale) serve an important function and should therefore be retained, although the latter requires modifications to the original boundary. The boundary of the Green Wedge between Tredegar and Ebbw Vale has been reduced considerably to that previously designated in the UDP as some land has been afforded sufficient protection because it has been designated as a Special Landscape Area. It was not considered necessary to retain the Green Wedges at Rassau and housing areas to the south and Tafarnaubach and housing areas to the east because they fail to meet the criteria of the green wedge policy, as their role was to act as a buffer between employment and housing. The Green Wedges are reflected on the Proposals Map.

TABLE 1: An Assessment of Existing Green Wedge Allocations in the Adopted Unitary Development Plan

GREEN WEDGES	Protect vulnerable undeveloped land	Protect urban form	Prevent coalescence between and within settlements	Protect open nature of the land
Beaufort and Brynmawr	✓	✓	✓	✓
Tredegar and Ebbw Vale	✓	✓	✓	✓
Rassau and housing areas to the south				
Tafarnaubach and housing areas to the east				

Trees, Woodlands and Hedgerows

5.59 Planning Policy Wales identifies trees, woodlands and hedgerows as being of great importance both as wildlife habitats and in terms of their contribution to the landscape character beauty of an area. They benefit not only the rural environment, but also the built environment by enhancing townscapes and providing a sense of place and local distinctiveness. Our ancient trees and woodland provide a living piece of natural history that also enhances our link with the past and our sense of place.

5.60 PPW recommends that local planning authorities should seek to protect trees and groups of trees (para. 5.2.9). PPW goes on to state that local planning authorities should make full use of their powers to protect and plant trees to maintain and improve the appearance of the countryside and built up areas (para 5.2.10). This is endorsed by the Town and Country Planning Act, 1990 (as amended) which states that "*it shall be the duty of the local planning authority to ensure, whenever*

it is appropriate, that in granting planning permission for any development adequate provision is made, by the imposition of conditions, for the preservation or planting of trees" (Section 197).

- 5.61 Currently, only trees and woodlands that are protected under Tree Preservation Orders (TPOs) or are within a conservation area are legally protected. *Technical Advice Note 10: Tree Preservation Orders, 1997* highlights the fact that protected trees are a material planning consideration (Town and Country Planning Act, 1990 Section 197).
- 5.62 Hedgerows are often seen as key defining features of the British and Welsh landscape character. However, the loss of hedgerows through removal, dereliction and general lack of management has been a key feature in recent decades to the detriment of our natural environment.
- 5.63 With this in mind, the Hedgerow Regulations, 1997, which were made under the Environment Act 1995 were introduced in England and Wales to protect hedgerows for the contribution they make to the natural heritage. The legislation protects hedgerows that qualify as 'important' under the hedgerow regulations criteria. When a hedgerow qualifies as important there is a strong presumption that it will be protected.
- 5.64 Policy DM17 will ensure that development proposals do not cause unacceptable harm to trees, woodlands and hedgerows.
- 5.65 Draft Supplementary planning guidance has been prepared, entitled "*Trees and Development: A Guide to Incorporating Trees, Woodlands & Hedgerows into Development Proposals*". This SPG provides a reference for developers, including a step-by-step guide in how to incorporate trees in proposals for development.

GEOLOGY

Regionally Important Geological Sites (RIGS)

- 5.66 Regionally Important Geological Sites are a non-statutory geodiversity designation. The RIGS in Wales are supported by the Countryside Council for Wales and are designated by regional RIGS groups. A Wales-wide network of audited RIGS is nearing completion with the South-East Wales region (including Blaenau Gwent) being carried out by the South Wales RIGS group. The roll-out of an all-Wales RIGS database is anticipated to commence in 2011, as soon as the All-Wales RIGS audit is completed.
- 5.67 Brynmawr Sections SSSI is currently the only designated Geological site in Blaenau Gwent. It will remain protected under SSSI Status, which is of a higher level of protection in policy terms than RIGS, and as such it is not considered necessary to replicate this protection by formally adopting it as a RIG within the LDP

- 5.68 Policy SP10 ensures that development retains, protects and enhances features of ecological or geological interest, and provides for the appropriate management of these features.

BUILT ENVIRONMENT

Listed Buildings

- 5.69 Under the provisions of the Planning (Listed Building and Conservation Areas) Act 1990, the Secretary of State for Wales is required to produce a list of buildings of special architectural or historic interest for the guidance of local planning authorities. This responsibility is undertaken by Cadw (an executive agency of the Welsh Assembly Government). Buildings and structures are classified in grades (I, II* and II) to indicate their relative importance. All listed buildings and structures are awarded the same level of protection regardless of their grading. The effect of listing is that proposals to alter, extend or demolish such a building require listed building consent, in addition to the requirement for planning permission. There are currently 53 listed buildings or structures within the County Borough, They are shown on the Constraints Map and include Tredegar Town Clock, Sirhowy Ironworks, the General Offices and Nantyglo Roundhouse Towers.
- 5.70 The listing process provides a layer of protection that exists outside of the remit of the planning system. Aside of this, it is the subject of national planning policy as contained within Planning Policy Wales (PPW). Consequently there is no need for the LDP to address the issue at the local level, which would amount to repetition of national policy.
- 5.71 Heritage tourism will also be promoted through Policies SP11 and TM1. The latter policy allocates Bedwellty Park and Nantyglo Roundhouse Towers, which have potential for heritage tourism. More details are contained in the Tourism Background Paper.
- #### **Buildings and Structures of Local Importance**
- 5.72 There are a number of buildings within the County Borough that, although not statutorily listed by Cadw, are considered to have local importance by virtue of their historic, cultural or architectural merit. Such buildings are at risk of being altered or changed with no regards for their local importance, since this has not been recognised. In several cases these buildings may even be demolished, resulting in their loss.
- 5.73 As there is no protection afforded to them it is appropriate to safeguard such buildings on a local basis, using development plan policy to ensure that features of cultural, architectural and/or historic importance are maintained for their own purposes, or until recognised and listed by Cadw. Policy DM18 will ensure that development proposals affecting such buildings or structures will only be permitted where the building's distinctive appearance, architectural integrity, and its setting would not be significantly adversely affected.

- 5.74 The Council does not have a list of such buildings and structures however, but a local list will be compiled from visual surveys and consultation with local interest groups. SPG will set out methodology for such a list.

Conservation Areas

- 5.75 Under the Planning (Listed Buildings and Conservation Areas) Act and Regulations 1990, local authorities have a statutory duty to identify areas of special architectural or historic interest, the character of which it is desirable to preserve or enhance, and designate them as conservation areas. These are afforded statutory protection by the Act, which provides that within these areas, local authorities are duty bound to prepare proposals for their preservation and enhancement, and to have special regard for proposals that may affect its character. The Act further provides control over the total or substantial demolition of a building within a conservation area and enables local authorities to affect repairs and make available grants and loans for repairs or restoration of buildings.
- 5.76 The two conservation areas in Blaenau Gwent are both located in Tredegar and shown on the Constraints Map. The second conservation area has been declared as part of the Tredegar Townscape Initiative and it adjoins the other conservation area at Bedwellty Park.
- 5.77 As the Council does not intend to depart from or add to the position as laid down by legislation or national guidance conservation areas are not considered relevant for inclusion in the LDP

Historic Parks and Gardens

- 5.78 Cadw, in association with the International Council on Monuments and Sites and the Countryside Council for Wales, has prepared a Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales. The register has been prepared in two parts. The first part covering historic parks and gardens lists Bedwellty Park. Tredegar. This designation is reflected in the LDP Constraints Map.
- 5.79 The designation is given to parks and gardens for their historic interest, contents and features, condition, and historical associations. They are graded on a similar grading system to listed buildings and Bedwellty Park is evaluated as Grade II.
- 5.80 The effect of development upon historic parks and gardens, and their settings is regarded as a material consideration with respect to the determination of planning applications. As such the inclusion of Bedwellty Park within the register provides the protection afforded by the designation and the inclusion of a policy in the LDP is unnecessary.

Historic Landscapes

- 5.81 In Wales, the most important and best surviving historic landscapes have been identified on the Register of Landscapes, Parks and Gardens of Special Historic Interest in Wales, which was referred to in the above paragraph. The first part

covers historic parks and gardens whilst the second part is a register of Landscapes of Historic Interest in Wales. The register identifies two types of historic landscape:

- Outstanding Historic Landscape Areas;
- Special Historic Landscape Areas.

5.82 Part 2.1 of the Register of Landscapes of Outstanding Historic Interest in Wales lists Blaenavon, part of which falls within Blaenau Gwent.

5.83 Part 2.2 of the Register of Landscapes of Special Historic Interest in Wales lists Clydach Gorge, part of which is also in Blaenau Gwent.

5.84 Both Historic Landscapes are shown on the Constraints Map

5.85 The effect of development upon historic landscapes (as in the case of historic parks and gardens), and their settings is regarded as a material consideration with respect to the determination of planning applications. As such the inclusion of the two historic landscapes within the register provides the protection afforded by the designation and the inclusion of a policy in the LDP is unnecessary.

Scheduled Ancient Monuments

5.86 Scheduled ancient monuments (SAMs) are nationally important archaeological sites that are protected under the Ancient Monuments and Archaeological Areas Act 1979. The Welsh Assembly Government, through CADW, compiles and maintains the Schedule of Ancient Monuments of National Importance. 13 sites are designated within the County Borough and these are shown on the Constraints map. The effect of scheduling is that proposals to damage, demolish, remove, repair, alter, add to, flood or cover up a SAM require scheduled monument consent, on top of the requirement for planning permission.

5.87 As SAMs are protected independently of the planning system, there is no requirement for such protection to be included within the LDP.

Land Reclamation

5.88 One of the key principles of Minerals Technical Advice Note 2: Coal (2009) is to achieve high standard restoration and beneficial after-use of land following coal extraction and provides best practice on land reclamation schemes.

5.89 Due to the area's industrial legacy a number of sites were allocated for land reclamation. The 15 sites allocated for Land Reclamation in the adopted Unitary Development Plan were reviewed by a group of officers in order to determine whether any of them needed to be allocated in the LDP. At the same time any potential new land reclamation sites were assessed. Some of the allocated sites had already been reclaimed or had reverted back to nature and did not present any safety issues so it was decided to leave such sites undisturbed. Therefore such sites did not require any reclamation works to be carried out. Others were of archaeological value (being potentially considered for scheduling) and it was not necessary to allocate them. Parc Bryn Bach has been allocated in order to reclaim

part of the lake and create a wetland. Llanhilleth Pithead Baths is another newly allocated site and the removal of the derelict industrial building, which is considered to be an eyesore will enable the land to be developed. In total 4 sites have been allocated for land reclamation and they are shown on the Proposals Map. The results of the review are shown in the following table.

TABLE 2: An Assessment of Existing Land Reclamation Allocations in the Adopted Unitary Development Plan

Site	Allocate in LDP	Justification/comments
Ty Pwcca to Beaufort, Ebbw Vale	No	Site of archaeological importance
Ty Pwcca to Beaufort, Nantyglo	No	Site of archaeological importance
Caban Gwyn Nantyglo	No	Site of archaeological importance
Racehorse–Brynmawr-Clydach	No	Site of archaeological importance
Blaenavon Road, Brynmawr	No	Site of archaeological importance
Blaenant Farm, Brynmawr	No	Site of archaeological importance
Cwmcrachen. Brynmawr	Yes	Some land still requires reclamation/remediation works but the site has been reduced considerably to that allocated in the UDP as part has been developed
Hafod-y-coed	No	Site reverted back to nature
Vale Terrace	No	Site reverted back to nature
Pennant Street	Yes	Some land still needs reclamation but the site has been reduced to that allocated in the UDP as land has either already been reclaimed or reverted back to nature
West of Aneurin Crescent	No	Site of archaeological importance
Blaina Plastics	No	Site reverted back to nature/developed
Six Bells Colliery site	No	Site already developed
Dunlop Semtex, Nantyglo	No	Site already developed
Land west of Bryn Serth	No	Site has been reclaimed already and a large part of it is now designated as a SINC or Green Wedge
Llanhilleth Pithead Baths	Yes	This site was not allocated for land reclamation in the UDP but is allocated in the LDP for the purpose of demolishing the former industrial building to permit the site to be developed for housing
Parc Bryn Bach	Yes	This site was not allocated for land reclamation in the UDP but is to be allocated in the LDP as it is proposed to reclaim part of lake and establish a wetland

6.0 KEY ISSUES IN BLAENAU GWENT

6.1 Pre-deposit participation undertaken between July and August 2007 has provided a clear indication of those land use issues that key stakeholders consider to be of primary importance in Blaenau Gwent.

The Issues Paper (July 2007)

6.2 The Issues Paper (July 2007) identified key issues that the Plan needed to address:

- To protect and enhance local landscape in the face of competing development uses
- Maximise the natural environment for health and well-being.

6.3 A consultation exercise on the Issues Paper asked the following questions in relation to the environment:

Question 6.1

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

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

How addressed

These views have been taken into consideration when determining the detailed policies for inclusion in the Deposit Plan,

Question 6.2

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

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

could be released to help achieve the aims of the LDP. Another felt that policies should be adopted to ensure adequate protection against potentially undesirable schemes, possibly wind development and waste disposal.

How addressed

These views have been taken into consideration when determining the detailed policies of the Deposit Plan.

Question 6.3

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

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

How addressed

The current level of protection was considered sufficient by half the respondents, which may indicate that current urban boundary policies and environmental policies are working to a degree. It is noted that a third of respondents were dissatisfied and this has been taken into account by ensuring extra protection has been afforded to the countryside through the designation of 137 SINCS in Blaenau Gwent.

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

Question 6.4

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

83% of responses agreed that the boundaries should be reviewed. It was felt that as SINCs are currently being identified there is a clear need to determine their boundaries and adequacy. A respondent commented that the use of Special Landscape Areas within the LDP need to be reassessed using LANDMAP. A further comment was that the Green Wedge designation should be re-examined and adjusted accordingly. One stated that it would be difficult to comprehensively reassess the adequacy of all land and boundaries and that it may be more appropriate to use criteria based policies that require development proposals to consider the quality of the landscape etc.

How addressed

The Council has reviewed the boundaries of the Special Landscape Areas through the use of LANDMAP information.

- 6.12 Deposit plan policies have, where appropriate, take these views into account.

Sustainability Appraisal / Strategic Environmental Assessment Scoping Exercise

- 6.13 The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) Scoping Exercise was undertaken between March – December 2007. The process identified key strategic problems, objectives and issues for sustainability. 18 key sustainability issues were identified 2 of which are related to the environment:

- Protection of ecological resources and biodiversity; and
- Under appreciation and protection of heritage

7.0 THE PREFERRED STRATEGY

- 7.1 The Preferred strategy provided the following policy framework for the environment in Blaenau Gwent:

Objectives

12 Protect, enhance and manage the diversity of the biodiversity resource of Blaenau Gwent through the identification of ecological corridors

13 Raise the standard of design to improve the quality of the physical and natural environment; and protect and enhance Blaenau Gwent's historic and cultural environment.

- 7.2 Three comments were made on Objective 12

Issue – key wildlife areas

- 7.3 1 comment recommended the rewording of objective 12 to read, "Protect, enhance and manage the diversity of the biodiversity resource of Blaenau Gwent through the identification of key wildlife areas and linking to form wildlife corridors."

Response

- 7.4 Agree to identify and protect wildlife sites in the Deposit Plan

Issue - Connectivity of ecological networks

- 7.5 1 comment objected to the wording of objective 12 and suggested the following alternative 'Protect, enhance and manage the biodiversity resource of Blaenau Gwent and identify, protect and increase the connectivity of ecological networks'.

Response

- 7.6 Objective 12 has been amended and now refers to the connectivity of ecological networks. The importance of ecological networks is reflected in the Deposit Plan through the inclusion of policies relating to the Green Infrastructure.

Issue – key wildlife areas

- 7.7 1 comment considered that objective 12 should also explicitly identify an intention to protect, and where appropriate enhance biodiversity, including designated sites

and protected species generally, and where appropriate through the design of new development/ regeneration schemes.

Response

7.8 The Deposit plan will refer to the protection and enhancement of biodiversity including designated sites and protected species.

7.9 Two comments were made on Objective 13

Issue – Design

7.10 One comment recommended the rewording of objective 13 to read, “Ensure the standard of design is good quality, sustainable, appropriate to its context, and will improve the quality of the physical and natural environment; and protect and enhance Blaenau Gwent’s historic and cultural environment”.

Response

7.11 Policy DM1 in the Deposit Plan will encourage good quality sustainable design in new developments. Policy DM2 will ensure that development proposals are appropriate to the local context in terms of type, form, scale, mix, and density.

Issue – Biodiversity Features

7.12 1 comment recommended the clarification of objective 13 and suggested referring to incorporating existing biodiversity features into new development, and providing ecological enhancements, as well as respecting the physical and historic setting.

Response

7.13 Policy DM2 refers to incorporating biodiversity features in new developments. It recognises that the landscape and the natural environment are amongst the most important local resources and needs to be protected and enhanced. Policy DM2 explains that the key is to incorporate areas of established importance and ensure these are protected and enhanced, for example through their management and the incorporation of new features such as native trees and plants.

SP16- Environmental Protection

7.14 The County Borough’s distinctive character, natural environment and designated landscape will be protected, preserved and enhanced. Of particular importance are:

- Those attributes and features which make a significant contribution to the character, quality and amenity of the landscape;
- Ecology, wildlife, habitats and the linkages between them;
- Geological and heritage interests; and
- The quality of natural resources, including water, air and soil.

Two comments were made on Strategic Policy 16.

Clarity

- 7.15 One comment recommended the inclusion of the following for clarity and to encourage ongoing management and ownership of nature conservation features; 'biodiversity and ecological networks' and 'minimisation of air, soil, water, noise and light pollution'.
- 7.16 Policy SP10 refers to ecological networks whilst DM1 states that new developments will not be permitted where there is unacceptable risk of harm to health and/or amenity from unacceptably high levels of noise, vibration, odour or light pollution. In addition, under Policy DM3 development will only be allowed where adequate provision is made for the necessary infrastructure to protect water quality and quantity. Also, under this policy development will not be permitted where it is considered that the resultant emissions to air will have an unacceptable impact on the existing and/or future air quality within the Borough or where there will be an unacceptable adverse impact on public health and/or the environment.

Protection

- 7.17 One comment reflected that the strategic policy should also contain an explicit intention to protect, and where appropriate enhance sites designated for their nature conservation interest, and protected species.
- 7.18 Agreed. SP10 states that national and international nature conservation sites will be protected in line with national policy.

SP 17 The distinctive built environment of the County Borough will be protected and enhanced. Development proposals should:

- Respect local character and distinctiveness of the area; and
- Enhance sites protected for their historic or archaeological value.

- 7.19 One comment was made on Strategic Policy 17
- 7.20 It was commented that the importance of local landscape character should be considered, possibly as part of policy SP17, as a complement to SP16's concern with the designated landscape.
- 7.21 The importance of Local landscape character is taken into account in SP10, which relates to 'protecting those attributes and features which make a significant contribution to the character, quality and amenity of the landscape'.

8.0 DRAFT LDP POLICY

8.1 To address the issues raised with the objective and policies the following is proposed.

Objective 12 The unique landscape and natural heritage, has helped foster sustainable tourism and promoted community pride.

Objective 13 By 2021, the biodiversity resource of Blaenau Gwent has been enhanced and the connectivity of ecological networks have been improved from 2006 levels.

Objective 14 Blaenau Gwent's historical and cultural environment has been protected and enhanced and has contributed to the regeneration of the area.

SP10 Protection and Enhancement of the Natural Environment

Blaenau Gwent's unique, natural environment and designated landscape will be protected, preserved and, where appropriate, enhanced. This will be achieved through:

- a. Protecting national, European and international nature conservation sites in line with national planning policy;
- b. Protecting those attributes and features which make a significant contribution to the character, quality and amenity of the landscape;
- c. Giving appropriate consideration to European and nationally designated and other important species and habitats identified as priorities for nature conservation, in line with national planning policy;
- d. Maintaining and enhancing the Green Infrastructure including creating a network of local wildlife sites and wildlife corridors, links and stepping stones;
- e. Ensuring that development retains, protects and enhances features of ecological or geological interest, and provides for the appropriate management of these features; and
- f. Ensuring development seeks to produce a net gain in biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for.

The local natural environment has seen considerable changes over the past 30 years. As the pressures put upon it by heavy industry have subsided, the visual and wildlife qualities that are unique to the area have significantly increased. The Strategy aims to protect and enhance the local landscape, biodiversity and geodiversity. This will be achieved through the identification, protection and enhancement of international, European, national and locally important sites as well as habitats and species across the Borough.

This Policy aims to protect key recreational and green assets (Green Infrastructure) including ecological networks and landscape features that are important for biodiversity. It is important to maintain and enhance ecological networks of natural and semi-natural habitats that have a high degree of connectivity. One way of achieving this will be through the designation of important ecological networks that have been identified as part of the process of designating SINC's and Local Nature Reserves. The identifying, protecting and linking of ecological corridors will assist in enabling wildlife to cope with climate change. Policy DM16 provides further information in support of this Policy.

SP11 Protection and Enhancement of the Built Environment

Blaenau Gwent's distinctive built environment will be protected, preserved and, where appropriate, enhanced. This will be achieved through:

- a. Safeguarding nationally designated sites from inappropriate development in line with national planning policy and guidance and also protecting locally designated buildings of significant importance and conservation areas;**
- b. Enhancing sites of historic or archaeological value; and**
- c. The promotion of heritage tourism.**

The natural environment is diverse and widespread including specific biodiversity protection for areas and habitats and species including national and local designations. It is important that these are protected from inappropriate development but, where the need for the development outweighs the nature conservation importance of the site and it can be demonstrated that the development cannot reasonably be located elsewhere, mitigation and/ or compensation will be required to ensure that there is no net loss of biodiversity. Mitigation will be necessary to offset any negative effects and where this is not possible, compensatory provision equivalent to that lost as a result of the development will be necessary. Mitigation may mean on-site or off-site mitigation and will be delivered through S106 agreements and planning conditions. However, development will be encouraged to result in a net improvement in terms of biodiversity by taking account of it as part of any development.

Blaenau Gwent boasts ancient monuments, historical buildings and landscapes that reflect its unique archaeology and social history. The area has 13 scheduled ancient monuments, 53 listed buildings, 2 conservation areas, 2 registered historic

landscapes (which fall partially within its boundary) and 1 registered historic park and garden. Also, there are a number of buildings, which are of local importance, but are not protected by National Policies, and a list of such buildings will be compiled during the Plan period and they will be afforded protection under this Policy.

A second conservation area has been designated in Tredegar, which provides the opportunity to encourage and promote the conservation of the architectural heritage of the designated area. The LDP considers the historic built environment as a valuable resource that should primarily be protected for its own sake in line with national planning policy but can be harnessed in a sustainable manner, for example, through promoting heritage tourism, for the purposes of regeneration. The Tourism Strategy intends to develop heritage sites as tourism attractions by developing tourism trails to heritage locations, providing on site interpretation and improving the marketing of the sites. Nantyglo Roundhouse Towers, the General Office building at Ebbw Vale and Bedwellty House and Park are three major projects, which could increase the visitor numbers to the area. The built heritage provides an important cultural and historical identity that if protected and enhanced could provide tourism opportunities. The LDP will ensure that sites are preserved and enhanced and that a framework is put in place to promote tourism opportunities.

Natural Environment

DM15 Biodiversity Protection and Enhancement

- 1. Development proposals within 10 km of the Usk Bat Sites SAC that would have an impact on connectivity corridors or cause direct or indirect disturbance to the features must be subject to a project level HRA.**
- 2. Development proposals will only be permitted within, or in close proximity to sites designated as Sites of Importance for Nature Conservation (SINCs), and Local Nature Reserves (LNRs), or that affect ecological corridors and Priority Habitats and Species, where either:**
 - a. It maintains or enhances the ecological or geological importance of the designation, or**
 - b. The need for the development outweighs the nature conservation importance of the site and it can be demonstrated that the development cannot reasonably be located elsewhere and compensatory provision will be made equivalent to that lost as a result of the development.**

Development proposals on land which although a considerable distance away (10km), could impact upon the Usk Bat Sites SAC. A key aspect of the lesser horseshoe bat is its mobility, which means that it could potentially travel many kilometres from Usk Bat Sites SAC. Therefore mitigation measures are necessary

in respect of potential development in all areas with the exception of the very southern parts of the Borough. Consequently any potential development proposals that would have an impact on connectivity corridors or cause direct or indirect disturbance to the features (such as light, noise etc.) must be subject to a project level HRA.

Blaenau Gwent is an area with a rich and diverse natural environment, including specific biodiversity protection for areas and habitats and species including international, national and local designations. International and nationally designated sites will be assessed in accordance with national planning policy. This element of the Policy applies to locally designated sites, for example, the 137 Sites of Importance for Nature Conservation (SINCS) and 6 Local Nature Reserves. It also applies to sites which contain habitats and species identified as priorities in either the UK or Local Biodiversity Action Plan (LBAP) and landscape features which may provide ecological corridors or 'stepping stones' between habitats.

The aim of the Policy is to maintain or enhance the biodiversity or geological interest of the respective site including its habitats and species. Whilst it is important to protect the biodiversity and geodiversity of these sites from inappropriate development, it should be noted that in accordance with national planning policy the designation of non-statutory sites such as SINCs will not preclude appropriate socio-economic activities.

Where development is proposed which may cause unacceptable harm, information will be required to enable a full assessment of the proposal and its impacts on biodiversity and geodiversity. Such assessments, including ecological surveys will need to be undertaken at the appropriate time of the year and by appropriately qualified persons. If the need for the development outweighs the nature conservation importance of the site then the Council will seek to secure reasonable measures to offset any impacts or loss of habitat features or species present on a site that may occur as a result of the development. Such measures will be agreed prior to commencement of development and will be secured through appropriate planning conditions and/or planning obligations. The Council's Supplementary Planning Guidance on Biodiversity and Geodiversity, includes further information and guidance to support this Policy.

DM16 Protection and Enhancement of the Green Infrastructure

Development proposals will be permitted provided:

- 1. There is no loss in connectivity within the Strategic Green Infrastructure network which comprises:
 - a. River Corridors**
 - b. Special Landscape Areas****
- 2. Where appropriate, they facilitate connections to Strategic and Local Green Infrastructure; and**
- 3. Where appropriate, they create natural open space and features to enhance linkages between the Green Infrastructure**

Green Infrastructure (GI) is a network of connected, accessible, multi-functional sites (including parks, woodland, informal open spaces, and nature reserves) as well as linkages (such as river corridors and wildlife corridors) that can bring about multiple social, health, economic and environmental benefits to the area. The sites are multi-functional in that apart from their ecological value they can be used for various purposes, for example, leisure activities and promoting tourism with associated benefits in terms of health and the economy.

The Strategic GI in Blaenau Gwent (see Appendix 1 in Environment Background Paper) consists of the mountain ridges and river corridors. The mountain ridges are designated as Special Landscape Areas (SLA), and protected under Policy ENV2 whilst the river corridors are designated as Sites of Importance for Nature Conservation (SINCs) and are afforded protection under Policy ENV3. Below this strategic level there is Local GI such as cycle paths, informal open space, parks, SINCs and nature reserves.

The main purpose of this Policy is to ensure that development does not lead to loss of connectivity between the sites forming the Strategic Green Infrastructure because although these individual sites are important in their own right it is the resulting connectedness that brings considerable added value and enables a response to climate change.

Another aim of this Policy is to increase connections to Strategic and Local GI to help maximise the benefits that the GI generates. The community cycle network and SINCs forms the basis of linkages between the Local and Strategic GI. An example of how connections within the Local GI are being improved is the Ebbw Fach Trail which links together 13 community green spaces that provide a variety of amenities from Beaufort to Llanhilleth, a total distance of almost 16 kilometres. Development proposals should, where possible, facilitate connections between the Local GI and the Strategic GI. A report prepared by consultants highlighted that at present 65% of the population in Blaenau Gwent live within 400m of their nearest green space but the Plan aims to increase this to 80%.

The Green Infrastructure will also be enhanced by creating new open space and natural features as part of new development or through developer contributions. This whole approach integrates biodiversity interests, provides a response to climate change and enables more sustainable and healthy lifestyles by incorporating interests of cyclists and walkers. This infrastructure will be developed and enhanced in accordance with the aims and objectives of the Valleys Regional Park (VRP).

DM17 Trees, Woodlands and Hedgerow Protection

Development proposals will be permitted provided there would not be unacceptable harm to trees, woodlands and hedgerows that have natural heritage value or contribute to the character or amenity of a particular locality.

Trees, woodlands and hedgerows are a key part of the landscape, making a positive contribution to both the natural and built environment. In order to retain trees, woodlands and hedgerows of natural heritage and conservation value and minimise any adverse effects of development, applicants are required to assess all trees and woodlands, on and adjoining their site, using the recommendations of the current British Standard 5837 for trees in relation to construction in conjunction with the Council's Supplementary Planning Guidance 'Trees and Development: A Guide to Incorporating Trees, Woodlands & Hedgerows into Development Proposals'. The assessments should be used to inform the design, and will be used by the Council in fulfilling its statutory obligations in respect of protecting trees and woodlands. In considering hedgerows, the Council will have regard to their landscape, historic and nature conservation value, as well as their function as boundaries.

A number of trees, woodlands and hedgerows are protected through Tree Preservation Orders (TPO's), Conservation Area Status and the Hedgerow Regulations. In such instances there is national policy and guidance, which protects them. This policy relates to trees, woodlands and hedgerows which are a key part of the landscape and make a positive contribution to both the natural and built environment but are not protected through Acts or Regulations.

Built Environment

DM18 Buildings and Structures of Local Importance

Development proposals affecting buildings or structures which make an important contribution to the character and/or interest of the local area will only be permitted where the building's distinctive appearance, architectural integrity, and its setting would not be significantly adversely affected.

There are a number of buildings within Blaenau Gwent that, although not statutorily listed by Cadw, are considered to be of significant local importance by virtue of their historic, cultural or architectural merit. Such buildings are at risk of being altered or even demolished with no regards for their local importance, since this has not been recognised. These buildings should be retained, and appropriate uses sought to maintain their essential character. A local list of such buildings will be compiled from visual surveys and consultation with local interest groups. SPG will set out methodology for such a list.

ENV1 Green Wedges

Green Wedges have been identified at the following locations in order to prevent coalescence between settlements:

- 1. Beaufort and Brynmawr**
- 2. Tredegar and Ebbw Vale**

The extent of these areas is shown on the LDP Proposals Map and within these areas development that prejudices the open nature of the land will not be permitted.

The need to define and maintain open spaces between and within urban areas and settlements to prevent coalescence is considered important for the County Borough to protect the integrity of the built and natural environment. Rural Exception Sites will not be acceptable within Green Wedges.

Although other Policies in the Plan are aimed at restricting development in the countryside, it is considered necessary to provide additional protection to areas of important and vulnerable open land by restricting development on the urban fringe and between settlements. Each of the Green Wedges has been identified following consideration of factors such as development pressure, urban form and the potential for eventual coalescence of settlements.

ENV2 Special Landscape Areas

Special Landscape Areas are identified and will be protected at the following locations:

- 1. St Illtyd Plateau and Ebbw Eastern Sides**
- 2. Eastern Ridge and Mynydd James**
- 3. Cwm Tyleri and Cwm Celyn**
- 4. Mynydd Carn-y-Cefn and Cefn yr Arail**
- 5. Mynydd Bedwellty, Rhymney Hill and Sirhowy Sides**
- 6. Cefn Manmoel**
- 7. Trefil and Garnlydan Surrounds**
- 8. Beaufort Common**

Development within the defined Special Landscape Areas will be expected to conform to the highest standards of design, siting, layout and materials appropriate to the character of the area.

Special Landscape Areas (SLAs) are shown on the LDP Proposals Map and have been designated to protect areas that are considered to be important to the overall landscape, history, culture, biodiversity and geology of the County Borough. The designation of these landscape areas has been undertaken at a local level, using a regionally agreed methodology. The methodology used to identify the SLA's in Blaenau Gwent builds on the Countryside Council for Wales LANDMAP methodology and considers factors such as:

- Prominence;
- Spectacle – dramatic topography and views;
- Unspoilt areas - Pre-industrial patterns of land use;
- Remoteness and tranquility;
- Vulnerability and sensitivity to change;
- Locally rare landscape; and
- Special landscapes.

In order to protect the visual qualities of each SLA, development proposals within these areas will be required to conform to the highest possible design standards.

Details of the SLAs are contained in the Blaenau Gwent Special Landscape Areas Report (2009).

ENV3 Sites of Importance for Nature Conservation

Sites of Importance for Nature Conservation are identified at the following locations:

Policy Number	Site Name	Policy Number	Site Name
Ebbw Vale Area			
1.	Beaufort Hill Ponds & Woodland	21.	Waun-Lwyd species rich grassland
2.	Bryn Serth	22.	Waun y Pound
3.	Bwlch-y-Garn North	23.	Pond Group 1
4.	Bwlch-y-Garn South	24.	Pond Group 3
5.	Castell-coryn Grassland	25.	Pond Group 5
6.	Craig y Deri Pond	26.	Rassau Pond
7.	Eastville Road Meadow	27.	Rhyd y Blew
8.	Festival Lake	28.	Ebbw River
9.	Slopes of Mynydd Carn-y-Cefn (West) (1 of 2)	29.	Slopes of Mynydd Carn-y-Cefn (West) (2 of 2)
10.	Garden City	30.	Tarren y Trwyn Pond
11.	Garden City Pond	31.	Ty Llwyn Pond
12.	Garn-Cam-Isaf	32.	Land at Park View, Beaufort
13.	Garnlydan	33.	Land at Parkhill Crescent
14.	Hillside with acidic flushes	34.	Adjacent to Drysiog Farm
15.	Land Surrounding Wetland Centre	35.	Rear of New Cwm Terrace
16.	Gorse Bank Field	36.	Nant-y-Croft Rassau
17.	Meadowbank Field	37.	Cwm Slopes, Festival Park
18.	Pond 1709/045 Bwlch-y-Garn	38.	Old Allotments
19.	Land to the rear of Glwyndr Road, Rassau	39.	East of Penrhiwgwingi
20.	Mynydd Carn-y-Cefn and Cefn-yr-Arail Ebbw Vale & Upper Ebbw Fach	40.	Mynydd Manmoel, Ebbw Vale & Tredegar

Policy Number	Site Name	Policy Number	Site Name
Tredegar Area			
41.	Sirhowy Hill Woodlands & Cardiff Pond	61.	Tredegar Leisure Centre Grasslands
42.	Garn-ddu Meadow	62.	Bedwellty Pits Field
43.	Hirgan Fields Grassland	63.	Bryn-Bach School
44.	Industrial Estate Grasslands	64.	Cefyn Pyllau-duon Pond
45.	Lower Farm Field	65.	Nant Trefil Pond
46.	Lower Troedrhiwgwair	66.	Chapel House Field
47.	Parc Bryn Bach	67.	Darren Ddu
48.	Trefil Las Pond	68.	Trefil Ddu Pond (1 of 4)
49.	St. James Reservoir	69.	Trefil Ddu Pond 2 (2 of 4)
50.	Mynydd Bedwellte	70.	Trefil Ddu Pond 3 (3 of 4)

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51.	Nine Arches Grassland	71.	Trefil Ddu Pond 4 (4 of 4)
52.	North Pen-y-Lan Grassland	72.	Trefil Village Grassland
53.	Milgatw Farm Grassland	73.	Pyllau-duon Pond
54.	Fairview Field	74.	Upper Troedrhigwair Grasslands
55.	Pine Tree House Grassland	75.	Scotch Peter's Pond
56.	River Sirhowy	76.	South of Troedygwair
57.	Sheepfold Grasslands	77.	Highlands Grassland
58.	Shon Sheffrey's Reservoir Banks	78.	The Ducky/ The Small Ducky
59.	South Pen-y-Lan Grassland	79.	Tredeggar Patch Grassland
60.	The Fountain Inn Meadows		
Upper Ebbw Fach Area			
80.	Adjacent to Blaen-y-Cwm School	93.	Adjacent to Noble Square
81.	Blaenafon Road Pond 1	94.	Clydach River
82.	Blaenafon Road Pond 2	95.	Coalbrookvale
83.	Bourneville Slip	96.	Coed Troestre
84.	Bryn Farm	97.	Cwmcelyn East
85.	Brynawelon Pond	98.	Brynawelon Pond
86.	Pen y Waun Pond	99.	Cwmcelyn West
87.	Semtex Pond	100.	Edge of the Mulfran
88.	River Ebbw Fach	101.	Embankment Grassland
89.	Parc Nant y Waun	102.	Golf Course Pond
90.	Troestre Pond	103.	Llwydcoed Pond
91.	Pond Group 2, Brynmawr/Beaufort Hill	104.	Land to the east of Pant View Houses, Coed Cae
92.	Nantyglo Meadow		
Lower Ebbw Fach			
105.	Arail Farm Slopes North	115.	Cefn Bach, Abertillery
106.	Arail Farm Slopes South	116.	Coed y Gilfach
107.	Arail Pond	117.	Craig Swffryd
108.	Blaentillery Farm North	118.	Tirpentwys Cut
109.	North of Hendre Gwyndwr	119.	Cwm Farm Pond
110.	River Tyleri	120.	Coedcae Coch
111.	Six Bells Colliery Site	121.	Land to the east of Bournville Road
112.	Swffryd Wood	122.	Cwmtillery Lakes
113.	Blaentillery Farm South	123.	East of Gwastad Farm
114.	Swffryd-fach	124.	Hafod-y-Dafal acid grassland
Policy Number	Site Name	Policy Number	Site Name
125.	Mulfran, Mynydd Coity, Mynydd James & Gwastad	132.	Greenmeadow Farm
126.	Cwm Big North	133.	Cwmtillery Reservoir
127.	Swffryd Ganol Pond	134.	Llanerch Padarn West
128.	Coetgae Pond	135.	Roseheyworth Community Woodlands
129.	West of Blaentillery Farm	136.	Llanerch Padarn East
130.	Cefn Bach	137.	Coed Argoed
131.	Quarry at Gilfach Wen Farm		

The current provision of SAC's and SSSI's alone is not sufficient to maintain the biodiversity of Blaenau Gwent. It is therefore important to identify locally designated wildlife sites such as Sites of Importance for Nature Conservation (SINC). Blaenau Gwent currently has 137 SINC's which are shown on the Proposals Map. Work is in progress to designate a number of other SINCS. As soon as a site has been assessed and qualifies as a SINC under the '*Guidelines for the Selection of Wildlife Sites in South Wales*' and '*Mid valleys Criteria for the selection of SINCS*' (Gwent Wildlife Trust, 2004 and 2008), then its status as a SINC will be honoured and it will be covered by this Policy.

ENV4 Land Reclamation Schemes

Land reclamation schemes are proposed at the following locations:

1. **Pennant Street, Ebbw Vale**
2. **Parc Bryn Bach, Tredegar**
3. **Cwmcraehen, Brynmawr**
4. **Llanhilleth Pithead Baths, Llanhilleth**

As a consequence of the industrial history of Blaenau Gwent there are a number of derelict sites. However, not all derelict land requires reclamation as some have reverted to nature; it is in the public interest to leave such sites undisturbed. Many of the sites are in highly visual areas and land reclamation will enable the removal of eyesores, which currently blight the landscape. It will also enable the restoration of areas to their natural appearance, thereby improving the visual environment. At the same time such sites may be of high biodiversity value and as ecological surveys are normally required on brownfield sites one will be required prior to any reclamation works.

9.0 DEPOSIT PLAN CONSULTATION RESPONSES

Objective 12

Issue – Omission of an objective for the protection, enhancement and management of the County Borough's landscape

Response

- 9.1 This is agreed and the Inspector is recommended to amend the Objective through a Focussed Change.

Policy: SP10 Protection and Enhancement of the Natural Environment

Issue – Policy drafting is at odds with Planning Policy Wales

9.2 The requirement to 'preserve' in SP10 is at odds with the requirements of PPW

Response

9.3 The Council recommends to the Planning Inspector that Policy SP10 be amended and the reference to preserve be removed.

Issue – Lack of clarity in policy justification

9.4 Policy justification should be sufficiently clear to enable identification of the sites that it relates to, for example, no mention of the 2 SSSI's in Blaenau Gwent.

Response

9.5 It is agreed that there is a lack of clarity within the justification. It is recommended to the Inspector that the following sentences should be added to Paragraph 6.66 to improve clarity.

9.6 Blaenau Gwent does not contain any European sites, although several SACS are in close proximity. It does, however, contain 2 SSSI's, which are sites of national importance.

Issue - Repetition of national policy in criterion a and c

Response

9.7 It is considered that the reference in criterion a to national policy should not be deleted in order to comply with the requirements of the HRA. However, it should be amended to include text from criterion c, which is to be deleted. It is recommended to the Inspector that this issue be addressed through a Focussed Change

Issue - Questions what is meant by 'important' species in criterion c

Response

9.8 It is agreed that to conform to national policy the word 'important' should be deleted from criterion c. As criterion c is being deleted and some text being relocated this change is now reflected in criterion a. It is recommended to the Inspector that this issue be addressed through a Focussed Change.

Issue - Seeks clarification of paragraph 6.68

Response

9.9 To add clarity to the Plan it is recommended to the Inspector that the sentence below in paragraph 6.68 to be amended as follows:

9.10 Mitigation will be necessary to offset any negative effects and where this is not possible, compensatory provision equivalent *in value* to that lost as a result of the development will be necessary.

Issue - The landscape north of Trefil needs protection and enhancement

Response

- 9.11 In recognition of its high landscape importance a Special Landscape Area (ENV2.7 Trefil and Garnlydan Surrounds) has been designated to the north of Trefil. The extent of the Special Landscape Area is shown on the LDP Proposals Map. Special Landscape Areas are non-statutory designations applied by local authorities to define and protect areas of high landscape importance and further information on Special Landscape Areas is contained in paragraphs 5.48 – 5.52 of the Environment Background Paper.
- 9.12 In respect of the potential for the area to be used as a film location this is supported by Policy SP11 criterion C which encourages the promotion of heritage tourism.

Issue – Fails to address water quality

Response

- 9.13 It is agreed that the plan does not facilitate improvements to water quality. To address this issue it is recommended to the Planning Inspector that a further criterion and supporting text be added to Policy SP10 and that this is addressed through a focussed change.
- 9.14 This representation has also been considered in Policy DM3, which has been amended accordingly.

Issue - Amendment required to criteria e) and f) as they contradict section 7.83

Response

- 9.15 Policy DM15 paragraph 7.83 explains that the designation of non-statutory sites such as SINCS does not preclude appropriate socio-economic activities. This is in line with national planning policy (PPW Edition 4 paragraph 5.4.4).
- 9.16 It is not considered that the wording of paragraph 7.83 contradicts criterion e and f of policy SP10. National planning policy is quite clear on this as paragraph 5.5.2 of PPW Edition 4, 2011 states:

When considering any development proposal (including on land allocated for development in a development plan) local planning authorities should consider environmental impact, so as to avoid, wherever possible, adverse effects on the environment. Where other material considerations outweigh the potential adverse environmental effects, authorities should seek to minimise those effects and should, where possible, retain and, where practicable, enhance features of conservation importance.

- 9.17 The suggested amendment of wording to criterion e and f is considered unnecessary.

Issue - Priority of development over SINCs

- 9.18 Statement in paragraph 6.68 has a get out clause where special species and habitats are concerned and gives priority to development. If a site is of special interest (such as the SINCs at Bryn Serth, Rhyd-y-Blew and Blue Lakes) then development should be limited to preserve some of the site.

Response

- 9.19 There are a variety of statutory (both national and international) and non-statutory designations that cover sites of nature conservation and wildlife value in Blaenau Gwent, which are a material consideration when determining planning applications. They are afforded different levels of protection, for example, locally designated sites such as SINCS are afforded less protection than statutory sites. Further information is contained in the Council's Supplementary Planning Guidance on Biodiversity and Geodiversity (see figure 4 p.26).
- 9.20 It should be noted that the intention is still to both protect and enhance biodiversity in Blaenau Gwent.

Issue – No reference to BBNP and clarity required to 'designated landscape'.

Response

- 9.21 It is recommended that paragraph 6.66 be amended to provide clarity. It is recommended to the Inspector that this issue be addressed through a Focussed Change.

Policy: SP11 Protection and Enhancement of the Built Environment

Issue – Questions title of policy

- 9.22 Policy and title called Built Environment but relates to broader historic environment

Response

- 9.23 it is recommended to the Inspector that the title of Policy SP11 be amended as through a Minor Change.

Issue – Repetition of National Policy

Response

- 9.24 It is agreed that to avoid repetition of national policy criterion a should be amended. It is recommended to the Inspector that this issue is addressed through a Focussed Change.

Issue – Tredegar’s uniqueness and historical importance should be preserved, enhanced and developed.

Response

- 9.25 Policy SP11 supports this as it relates to the protection and enhancement of the built environment. Blaenau Gwent’s (including Tredegar) distinctive built environment will be protected, preserved and where appropriate enhanced. This will be achieved by criteria a-c in this policy.

Issue – The landscape of Trefil needs to be developed for the film making industry.

Response

- 9.26 Policy SP11 criterion C which encourages the promotion heritage tourism. However, planning permission would probably not be required for such development as it is not normally required for temporary use of land for up to 28 days.

Issue – Guardian should be registered as a building of local and national importance

Response

- 9.27 Policy DM18 Buildings and Structures of Local Importance aims to protect buildings and structures of significant local importance, which are not statutorily listed by CADW and not currently afforded protection by law.
- 9.28 It is proposed that a register of buildings and structures of significant local importance will be compiled from visual surveys and consultation with local interest groups. Further information, including methodology to be used to assess whether a building or structure merits inclusion in the register will be available when Supplementary Planning Guidance is prepared. It is not known when this list will be compiled but it is likely to be after the Plan is adopted in 2013.
- 9.29 For the Guardian to be registered as a building of national importance it would have to be listed by CADW, who should be contacted for further information regarding the process.

Policy: DM15 Biodiversity Protection and Enhancement

Issue – Lack of Clarity

- 9.30 The justification should be sufficiently clear to enable identification of the sites the policy relates to.

Response

- 9.31 It is considered that Paragraph 7.82 states that international and national designations will be assessed in accordance with national planning policy. No

examples of such sites are provided in the justification text and WG argues that these sites need to be identified. A similar argument was made by WG in respect of SP10, which has been amended to take the representation into account. It is considered that as examples of international and national sites are now included in SP10 then there is no need to repeat them in this policy, as it would be repetition.

Issue - Lack of Clarity

- 9.32 Further clarification required of how proposals likely to result in disturbance or harm to legally protected species and their habitat will be assessed.

Response

- 9.33 It is agreed that further clarification is required and therefore it is recommended that criterion 2 be amended and that this be addressed as a Focussed Change.

Issue – Amend paragraph 7.82 for clarity

Response

- 9.34 It is agreed for clarity that 7.82 be amended and that this be addressed through a Focussed Change.

Issue – Lack of Clarity

- 9.35 Suggests rewording of DM15 to ensure it sits comfortably alongside the thrust of paragraph 7.3

Response

- 9.36 The current wording is considered appropriate and in keeping with the purpose of the policy i.e to maintain or enhance the biodiversity or geological interest of the respective site.

Policy DM16 Protection and Enhancement of the Green Infrastructure

Issue - Lack of Clarity

- 9.37 To improve clarity it is recommended that the final sentence of paragraph 7.86 is amended by inserting 'other' before SINC's.

Response

- 9.38 It is agreed for the purposes of clarity that the final sentence of paragraph 7.86 is amended by inserting 'other' before SINC's. It is recommended that this be addressed through a Minor Change.

Issue – Role of SBCF regarding Ebbw Fach Trail

- 9.39 Former colliery site at Six Bells and Guardian form a unique centrepiece of the Ebbw Fach trail which, it should be noted was actually a Six Bells Communities First development.

Response

- 9.40 Paragraph 7.88 highlights that the Ebbw Fach Trail has improved connectivity through its linking of 13 community groups from Beaufort to Llanhilleth. The representor explains that the former colliery site at Six Bells and Guardian form a unique centrepiece of the trail and suggests that it should be noted that the Ebbw Fach Trail was actually a Six Bells Communities First development. It is unclear whether the representor proposes that additional text should be added to paragraph 7.88 to reflect the role played by SBCF or whether it is a general comment. It is not considered necessary to add further text to the paragraph, as the reference to the importance of the Ebbw Fach Trail in terms of the Green Infrastructure is sufficient.

Issue – Need to Maintain and develop existing open spaces

- 9.41 Paragraph 7.89 explains that Green Infrastructure will be enhanced by creating new open spaces. SBCF outlines need to maintain and develop through careful planning existing open spaces such as the former colliery site at Six Bells.

Response

- 9.42 The importance of maintaining the Green Infrastructure is recognized and it will be maintained at the Six Bells site. The middle plateau will remain as open space with potential for further tourism development. It will continue to serve as an important green link both for people and in ecological terms.

Policy:DM18 Buildings and Structures of Local Importance

Issue - Sites and buildings should be conserved protected and restored. A register should be introduced for properties of local significance and importance.

Response

- 9.43 The aim of Policy DM18 Buildings and Structures of Local Importance is to protect such buildings that the Representor has identified i.e. those buildings and structures of significant local importance, which are not statutorily listed by CADW and not currently afforded protection by law. It is the intention that a list of buildings and structures of significant local importance will be compiled from visual surveys and consultation with local Interest groups. Further information, including methodology to be used to assess whether a building or structure merits inclusion in the register will be available when Supplementary Planning Guidance is prepared. Policy SP11 Protection and Enhancement of the Built Environment also makes reference to protection of buildings of local importance (see paragraph 6.69).

Policy: ENV1 Green Wedges

Issue – Lack of Clarity

- 9.44 The plan's written statement should clarify the relationship between this plan area and its neighbours. It would be useful for the plan to clarify its relationship with the existing and emerging LDPs of neighbouring plan areas with regard to the mapping of green wedges

Response

- 9.45 The two green wedges in Blaenau Gwent are not on the boundaries of any of the neighbouring authorities. Neither are there any green wedges on the boundaries of neighbouring authorities. Therefore there is no issue with green wedges and no need for the plan to clarify how the mapping of the green wedge areas meets with neighbouring authorities. It is therefore not considered necessary make any amendments.

Policy: ENV1.2 Tredegar and Ebbw Vale Green Wedge Alternative Site Ref: AS (A) 05

Deposit Issue – Need to extend the green wedge

- 9.46 Concerned at limited northern area of green wedge between Ebbw Vale and Tredegar, ENV 1.2. Designation should be broader & extend further northwards up to the southern edge of the HoV Road (a logical physical boundary) to prevent coalescence.

Response

- 9.47 It is agreed that the boundary of the green wedge should be amended and it is recommend to the Inspector that this issue be addressed through a Focussed Change.

Alternative Site Issue - Objection to site amendment

- 9.48 Disagree with altering the green wedge since the CCW's comments are very vague. CCW are supposed to protect rural Wales not allow unnecessary developments to be forced on the community via the back door.

Response

- 9.49 The representor appears to misunderstand the proposed amendment that would increase the green wedge.

Policy: ENV2 Special Landscape Areas

Issue – Lack of Clarity

- 9.50 The plan's written statement should clarify the relationship between this plan area and its neighbours. It would be useful for the plan to clarify its relationship with the existing and emerging LDP of neighbouring plan area with regard to the mapping of Special Landscape Areas.

Response

9.51 It is agreed for the purposes of clarity that an additional paragraph be added. It is recommended to the Inspector that this be addressed through a Minor Change.

Issue – Lack of consistency between SLA boundaries

9.52 Lack of consistency between SLA boundaries of Torfaen Council and BGCBC Blaenau Gwent SLA study details show the existing SLAS in the Adopted Torfaen Local Plan (2000) and not the updated and new boundaries developed for the LDP using the agreed methodology.

Response

9.53 In March 2007 consultants ‘TACP’ were appointed by a consortium of south-east Wales local authorities, including Blaenau Gwent, to develop criteria for the designation of Special Landscape Areas (See report – Development of criteria for Special Landscape Area designation for South East Wales Local Authorities (2007)).

9.54 In May 2008 the Council appointed a Landscape Architect to carry out a review of the Special Landscape Areas in Blaenau Gwent. The consultant used the criteria from the regional study but also applied local criteria, as there were issues with the Landmap data for Blaenau Gwent. The CCW Guidance Note 1 allows for local criteria to be used in defining proposed SLAs.

9.55 The report ‘Proposals for Designation of Special Landscape Areas in Blaenau Gwent (2009) contains a full explanation of how SLAs have been designated in Blaenau Gwent (see p. 7-13 for criteria used).

9.56 Therefore Blaenau Gwent used the agreed methodology i.e. LANDMAP to determine SLA coverage in the area but supplemented this with additional local criteria. This is considered acceptable as it is in accordance with CCW Guidance Note 1.

Policy:ENV3 Sites of Importance for Nature Conservation

Issue - SSSIs and LNRs should be identified on the Proposals Map

9.57 SSSIs and LNRs should be shown on Proposals Map not Constraints Map. PPW and LDP Wales both specify the need for local and national heritage designations to be clearly identified on the LDP’s Proposals Map.

Response

9.58 According to national planning policy (PPW Edition 4, 2011 and Paragraph 2.24 of LDP Wales (2005)) local and national heritage designations should be clearly identified on the LDP’s Proposals Map.

- 9.59 The approach taken by the Council is that the Proposals Map sets out local designations identified by the Council. Designations identified by separate legislation are identified on the Constraints Map. The advantage of this is that they can be updated when necessary and it does not give a false impression that the designations can be changed through the LDP process.

Policy:ENV3.2 Bryn Serth Sinc Alternative Site Ref AS (A) 04

Deposit Issue - Redraw boundary of SINC (ENV3.2) to exclude it from MU1 as it could ultimately be an unnecessary barrier to its development

- 9.60 The boundary of the designated SINC at Bryn Serth (ref ENV3.2) should be redrawn to exclude the land allocated as MU1 where there is an extant planning permission for mixed-use development as the duplication may be a barrier to development.

Response

- 9.61 Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely; 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. SINCS are approved by a Panel of experts, which includes the Countryside Council for Wales, Gwent Wildlife Trust, SEWBReC, the Blaenau Gwent Biodiversity Partnership, the Council's ecologist and other bodies. Further information on SINCS is available in the Environment Background Paper.
- 9.62 The representor has requested the boundary of the SINC to be amended as it covers an area of land where there is extant planning permission for mixed use but has not provided an ecological report to justify the proposed amendment. As the designation of SINCS was carried out on a scientific basis with supporting evidence there is no justification in amending the boundary.
- 9.63 It is acknowledged that an allocated site (MU1) falls within a SINC designation (ENV3.2) but whilst it is important to protect the biodiversity of SINCS from inappropriate development, it should be noted that in accordance with national planning policy, designation of SINCS will not preclude socio-economic activities. However, any development proposal will be informed by an ecological assessment to ensure protection and enhancement of biodiversity.
- 9.64 Therefore it is considered that the site should remain designated as a SINC, without any modification of its boundary

Alternative Site Issue – Would welcome meeting to discuss allocations

Response

- 9.65 A meeting was held with CCW where the allocation was discussed

Alternative Site Issue - Objection to amendment of SINC

- 9.66 It is not clear what the rationale is for amendment to boundary of the SINC. Site was designated for a particular reason using nationally agreed criteria and has an important role to play in biodiversity. Policies within LDP should provide protection.

Response

- 9.67 The objection is noted. Council proposes that the boundary of the SINC remains as in the Deposit Plan.

Issue – Objection to amendment of SINC

- 9.68 Disagrees with the boundary changes to permit housing, since the site is more vulnerable to preserve for the future, rather than for the profit of developers concerned.

Response

- 9.69 The objection is noted. Council proposes that the boundary of the SINC remains as in the Deposit Plan.

Policy: ENV3.104 Land to the east of Pant View Alternative Site – AS (D) 10

Deposit Issue – Objection to the SINC designation

- 9.70 Objects to the SINC designation at the Land East of Pant View and the findings of the survey carried out to designate the site as a SINC.

Response

- 9.71 All Sites of Importance for Nature Conservation were assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely; 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. SINCS are approved by a Panel of experts, which includes the Countryside Council for Wales, Gwent Wildlife Trust, SEWBRc, the Blaenau Gwent Biodiversity Partnership, the Council's ecologist and other bodies. Further information on SINCS is available in the Environment Background Paper. A copy of the authority's individual SINC site maps, corresponding site description and analysis are also available. The issue of allocating the site for housing in the Plan is dealt with under the report AS (N) 16.

- 9.72 It should be noted that an ecological report has not been provided to substantiate the respondent's disagreement with the SINC survey and it is considered that the site should remain designated as a SINC.

Alternative Site Issue – Objections to the deletion of the SINC

Response

- 9.73 All objections received during the alternative site consultation are noted. The Council proposes no change to the SINC.

Policy: ENV3.132 Greenmeadow Farm (SINC) Alternative Site AS (A) 17

Deposit Issue – The boundary of the SINC should be amended in the plan

- 9.74 The representation seeks to amend the SINC boundary of ENV3.132 to exclude Land at TY Pwdr Farm.

Response

- 9.75 The site was assessed and identified in accordance with a document produced by several South Wales Local Authorities, namely; 'Criteria for the selection of Sites of Importance for Nature Conservation in the County Boroughs of Blaenau Gwent, Caerphilly, Merthyr Tydfil and Rhondda Cynon Taff'. These criteria may be viewed in the document, which is part of the LDP evidence base. SINCS are approved by a Panel of experts, which includes the Countryside Council for Wales, Gwent Wildlife Trust, SEWBReC, the Blaenau Gwent Biodiversity Partnership, the Council's ecologist and other bodies. There is no proposed change to the boundary of the SINC.

Alternative Site Issue – Objections to the amendment of the SINC

Response

- 9.76 All objections received during the alternative site consultation are noted. The Council is not recommending the SINC be amended.

Policy: ENV4.2 PARC Bryn Bach (Land Reclamation) Alternative Site Ref AS (D) 07

Deposit Issue – The site should be deleted from the Plan

- 9.77 Land reclamation designation at Parc Bryn Bach will result in a detrimental effect on a key site and also there is a lack of consideration to environmental affect of marshy area

Response

- 9.78 The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site No.39). The site was allocated for land reclamation in order to reclaim part of the lake and create a wetland.

Deposit Issue – Detrimental effect on key site

Response

- 9.79 No evidence of the ‘detrimental effect’ has been provided. Therefore it is difficult to respond specifically. However, in general terms it is considered that the creation of a wetland will add to the biodiversity value of the site by creating additional habitats

Deposit Issue - Lack of consideration to environmental effect of marshy area

Response

- 9.80 The proposal is to convert an area of open water into a wetland, which would result in biodiversity gain through the creation of additional habitats.

Deposit Issue - Requests deletion of site due to loss of water feature

Response

- 9.74 The representor is concerned that draining part of the lake will have a detrimental impact on the overall site or diminish the enjoyment of visitors. As stated in the Environment Background Paper it is proposed to create a wetland. This will enhance the biodiversity of the area and complement the existing mosaic of habitats and increase overall enjoyment for visitors to Parc Bryn Bach

Alternative Site Issue - Support the deletion of the site from the Plan

- 9.81 The representor states that the site should not be allocated for land reclamation, as it is important for tourism and leisure, which should stimulate the already depressed economy. Parc Bryn Bach is recognised as a key tourism site in Blaenau Gwent. The purpose of the designation is to enable a wetland to be created, which will enhance the biodiversity of the area and complement the existing mosaic of habitats and increase overall enjoyment for visitors to Parc Bryn Bach.

Policy: ENV4.4 Llanhilleth Pithead Baths Alternative Site Ref: AS (D) 16

Deposit Issue – The site should be deleted from the Plan

- 9.82 The site was previously assessed and approved under the Candidate Site Assessment Process (Candidate Site No. D18).
- 9.83 The site was allocated for land reclamation in order to enable the removal of the derelict building, which is considered an eyesore, and to enable the land to be developed for housing.

:

Deposit Issue - Proposed use unknown

Response

- 9.84 The main concern raised by both representors relates to the proposed after use of the site. The site is currently occupied by the Llanhilleth Pithead Baths and will become vacant once the buildings are demolished. The proposed after use of the site is residential development and outline planning permission has previously been granted at this site (ref. 2006/ 0032) and a planning application was approved for demolition for residential development and realignment of the highway (ref. 2007/0578).
- 9.85 The proposed after-use was identified in the Environment Background Paper in Table 2 and an e-mail was sent to Mrs Joseph on 31st May 2011 explaining that *'The intention is to demolish the buildings on the site and carry out any remediation works necessary to permit the proposed after-use of the land. The site could offer an opportunity for Environmental Enhancement, Highway Improvement opportunity to realign severe bend, car park provision and limited housing development. As any potential development will be less than 10 units this site has not been identified for housing in the Deposit Local Development Plan'*.
- 9.86 The issue is with the after use of the site rather than the land reclamation scheme. As concerns on after use of the site have been raised rather than the actual allocation of the site for land reclamation being directly objected to then it is considered an acceptable allocation.

Alternative Site Issue - Support for demolition but after use should be a community facility

Response

- 9.87 The representation made by LTRA supports the demolition of the buildings but has suggested that a community facility be located on the site. No supporting evidence has been submitted such as a business plan for such a facility. When sites are allocated for land reclamation there must be a known after use and as planning permission has been previously granted at this site for residential development and demolition of buildings etc. then there is likelihood that such a development will take place.
- 9.88 It is considered that the land reclamation allocation should not be removed from the Plan in order to enable removal of the buildings.

Alternative Site Issue - Support for demolition but after use should be open space

Response

- 9.89 The representor has stated that the site should be deleted as a land reclamation allocation until its future use is known. Having said that her preferred after use is open space. She fails to understand that the buildings would need to be reclaimed for the site to be used for open space.

Policy: ENV5.2 Dukestown Cemetery
Alternative Site Ref: AS (D) 08

Deposit Issue - The site should be deleted from the Plan and retained for its current use as agriculture/ farmland

Response

- 9.90 The key policy document that relates to this issue is Planning Policy Wales, which requires local planning authorities to make adequate provision for community facilities, of which a cemetery is one such facility. In order to address demand in the County Borough it is necessary to allocate further cemetery provision.
- 9.91 The Council has undertaken a review of the current cemeteries capacity within Blaenau Gwent. Dukestown Cemetery has approximately 5 to 6 years burial capacity left at the cemetery based on existing burials. Also the proposed Heads of the Valleys dualling could result in the Council having to exhume a number of graves for re-burial, which would reduce future burial capacity. Therefore a future extension option is required to ensure there is continuity of burial service in Dukestown. The land is a logical extension to the existing cemetery.
- 9.92 Planning Policy Wales states that the best agricultural land (grades 1, 2 and 3a) should be preserved. The site in question consists of low-grade agricultural land (grade 5). Therefore, there is no requirement under national policy for it to be retained in its current use.

Alternative Site – No comments received

10.0 FOCUSSED CHANGES

FOCUSSED CHANGE 5 – IMPROVE THE PROTECTION OF THE ENVIRONMENT

FC5.A. Amend objective 12 to read as follows:

The **valuable** landscape of **Blaenau Gwent has been protected, enhanced and managed and together with the** natural heritage, helped foster sustainable tourism and promoted community pride

FC5.C: Amend Policy SP10 Protection and Enhancement of the Natural Environment by the deletion of the word preserved, the deletion of criterion c and the amendment of criterion a to read as follows:

Blaenau Gwent's unique, natural environment and designated landscape will be protected, and where appropriate, enhanced. This will be achieved through:

- a. Protecting national, European and international nature conservation sites in line with national planning policy **as well as other species and habitats identified as priorities for nature conservation;**
- b. Protecting those attributes and features which make a significant contribution to the character, quality and amenity of the landscape;

- c. Maintaining and enhancing the Green Infrastructure including creating a network of local wildlife sites and wildlife corridors, links and stepping stones;
- d. Ensuring that development retains, protects and enhances features of ecological or geological interest, and provides for the appropriate management of these features;
- e. Ensuring development seeks to produce a net gain in biodiversity by designing in wildlife, and ensuring any unavoidable impacts are appropriately mitigated for;

FC5.D: Amend paragraph 6.66 to read as follows:

The local natural environment has seen considerable changes over the past 30 years. As the pressures put upon it by heavy industry have subsided, the visual and wildlife qualities that are unique to the area have significantly increased. The Strategy aims to protect and enhance the local landscape, biodiversity and geodiversity. This will be achieved through the identification, protection and enhancement of international, European, national and locally important sites as well as habitats and species across the Borough. **In accordance with the Habitats Directive (Council Directive 92/43/EEC) development will not be permitted where it adversely affects the integrity of these sites. Blaenau Gwent does not contain any European sites, although several SACS are in close proximity. It does, however, contain 2 SSSIs which are sites of national importance.**

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.

FC5.E: Amend paragraph 6.68 to read as follows:

The natural environment is diverse and widespread including specific biodiversity protection for areas and habitats and species including national and local designations. It is important that these are protected from inappropriate development but, where the need for the development outweighs the nature conservation importance of the site and it can be demonstrated that the development cannot reasonably be located elsewhere, mitigation and/ or compensation will be required to ensure that there is no net loss of biodiversity. Mitigation will be necessary to offset any negative effects and where this is not possible, compensatory provision equivalent **in value** to that lost as a result of the development will be necessary. Mitigation may mean on-site or off-site mitigation and will be delivered through S106 agreements and planning conditions. However, development will be encouraged to result in a net improvement in terms of biodiversity by taking account of it as part of any development.

FC5.F: Amend Policy DM15 Biodiversity Protection and Enhancement criterion 2 to read as follows:

- a. It maintains or enhances the ecological or geological importance of the designation **and species**, or

b. The need for the development outweighs the nature conservation importance of the site/species and it can be demonstrated that the development cannot reasonably be located elsewhere and compensatory provision will be made equivalent to that lost as a result of the development.

FC5.G: Amend paragraph 7.82 to read as follows:

Blaenau Gwent is an area with a rich and diverse natural environment, including specific biodiversity protection for areas and habitats and species including international, national and local designations. **Proposals which are likely to have a significant effect on** international and nationally designated sites will be assessed in accordance with national planning policy. This element of the Policy applies to locally designated sites, for example, the 137 Sites of Importance for Nature Conservation (SINCS) and 6 Local Nature Reserves. It also applies to sites which contain habitats and species identified as priorities in either the UK or Local Biodiversity Action Plan (LBAP) and landscape features which may provide ecological corridors or 'stepping stones' between habitats

FOCUSSED CHANGE – 7 IMPROVING WATER QUALITY

FC7.A: Amend Policy SP10 Protection of the Natural Environment by the addition of a further criterion as follows:

f. **Ensuring development proposals do not have an unacceptable adverse impact upon the water environment and contribute to improving water quality where practicable**

FC7.B: Add an additional paragraph after paragraph 6.68 as follows:

The natural environment also covers water. This policy promotes the protection and improvement of the quality and quantity of controlled waters within the County Borough, including the surface and groundwater resource. Development will not be allowed if it is demonstrated that there is likely to be adverse impact on the water resources, both locally and regionally. Policy DM3 provides more detail and should be referred to when considering development proposals affecting the water environment.

FC7.C: Amend Policy SP10 cross reference box as follows:

Relevant Objectives, Development Management Policies, Allocations and Background Paper

- **Objectives**
- **Development Management Policies: DM3; DM15, DM16 and DM 17**
- **Allocations: ENV1, ENV2 and ENV3**
- **Background Paper: Environment**

FC7.G: Amend Policy DM3 cross reference box as follows:

Relevant Objectives, Strategic Policies and Allocations
<ul style="list-style-type: none">• Objectives: 5• Strategic Policies: SP10• Allocations: MU1, MU2, MU3, AA1, R1, H1, HC1, GT1, T1, T2, T4, T5, T6, EMP1, ED1, CF1, TM1, L1, M4, W1

FOCUSSED CHANGE 10: GREEN WEDGE BETWEEN TREDEGAR ABD EBBW VALE

FC10.A: Amend the boundary of Policy ENV1.2 on the proposals map to extend the Green Wedge as shown on map 4, attached at appendix 3

MINOR CHANGES

MC.11 Amend title of policy SP11 to refer to Historic Environment rather than Built as follows:

SP11 Protection and Enhancement of the **Historic Environment**

MC.12 Amend Paragraph SP11 through the deletion of:


in line with national planning policy and guidance

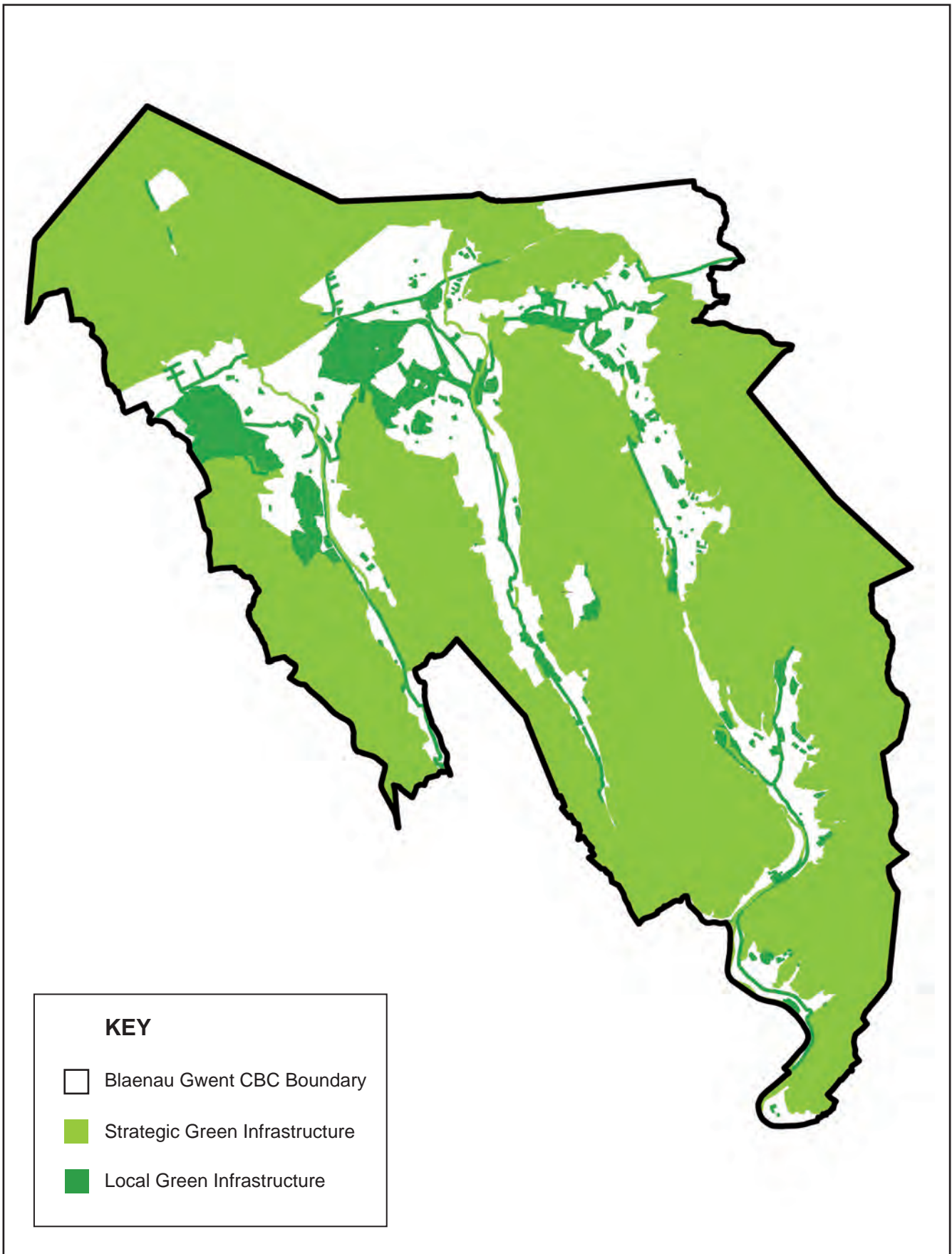
MC.19 Amend paragraph 7.86 to read as follows:

The Strategic GI in Blaenau Gwent (see Appendix 1 in Environment Background Paper) consists of the mountain ridges and river corridors. The mountain ridges are designated as Special Landscape Areas (SLA), and protected under Policy ENV2 whilst the river corridors are designated as Sites of Importance for Nature Conservation (SINCs) and are afforded protection under Policy ENV3. Below this strategic level there is Local GI such as cycle paths, informal open space, parks, **other** SINCs and nature reserves.

MC.28 Add the following text at the end of paragraph 8.73

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.

Date : 18/01/2010	Blaenau Gwent Environment Background Paper	 <p data-bbox="1273 197 1449 230">Blaenau Gwent</p> <p data-bbox="1273 230 1449 253">Cynghor Bwrdeistref Sion</p> <p data-bbox="1273 253 1449 277">Gwent's Borough Council</p> <p data-bbox="1273 277 1449 302">Regeneration Division</p>
Scale : 1:85000	Green Infrastructure	



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