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Dear Mr Maher

## MATTERS ARISING CHANGES TO THE BLAENAU GWENT COUNTY LOCAL DEVELOPMENT PLAN

Following our attendance at the Local Development Plan examination we welcome the opportunity to continue our involvement in the process and as such please accept the following comments in response to the focussed changes put forward by the Council following matters arising from examination.

### MAC S07 - POLICY DM1 DESIGN (P49)

Amendment to Policy DM1 to add criterion related to the amenity of new development; that that **'there would be no unacceptable adverse visual impact on townscape or landscape'**.

Use of visual impact assessment to determine the impact of any proposed development will ensure the Plan provides a coherent framework for the consideration of planning applications, which is logical and will be based on evidence. We support this addition.

### MAC C19 – POLICY DM1 DESIGN (P49)

Addition to Policy DM1 that **'development proposals will be permitted provided: - f) the proposal does not result in a net loss of biodiversity and provides where necessary mitigation and/or compensation measures'**

Allowing mitigation where necessary ensures consistency with other policies within the Plan to bring forward development on appropriate sites where compensation is agreed. We support this clarity for developers.

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#### MAC S08 – POLICY DM2 DESIGN AND PLACEMAKING (P53)

Removes 'density' from a) - '*Development proposals will be permitted provided: - a) they are appropriate to the local context in terms of type, form, scale and mix, ~~and density~~*'; adds comment on contribution to the local area to b) - '*Development proposals will be permitted provided: b) they are of good design which reinforces local character and distinctiveness of the area or ~~improves areas of poor design and layout~~; **or they positively contribute to the area's transformation and raise density, where appropriate***'; and adds comment to g) - '*Development proposals will be permitted provided: g) landscaping and planting, where appropriate, ~~is integral to the scheme and enhances the sites and~~ **achieves a suitable visual setting for the scheme and integrates it into the wider context***'.

This amendment allows for 'innovative development'. It will ensure proposals account for individual site characteristics and will support landscaping proposals which achieve a suitable visual setting and are integrated into the wider context which is consistent with other policies in the Plan. We support this addition.

#### MAC S09 – SUPPORTING TEXT AT PARA 7.17 - POLICY DM2 DESIGN AND PLACEMAKING (P53)

Addition at paragraph 7.17 that '*developments must be of an appropriate type, form, scale, **and mix, and density** for their location **or positively contribute to the area's transformation and raise density** as the Council is committed to raising the standard of design on all new development*' and that '***developers will be required to submit comprehensive masterplans for residential proposals of 50 dwellings and over which must have regard to the need to create high quality, sustainable and locally distinct places***'.

Flexibility on density will ensure new developments responds to the local area, consistent with other policies in the Plan.

The comment that developments should '*raise density*' conflicts with other policies within the plan which seek to integrate development and respond to the local context (e.g. PM2). Along with '*type, form, scale, and mix*', the supported density should be appropriate to the site. The council have sought to raise density levels to secure the housing numbers needed from the identified sites, but should not rely on an ambitious density level from sites which may conflict with other policies within the Plan. To ensure consistency, the comment on density should be as stated within Policy DM2, to '*raise density, where appropriate*'.

Comment that masterplans should '*create locally distinct places*' should not contradict other policies that seek to integrate new development into the surrounding area (e.g. MAC S08 related to Policy DM2 above).

#### MAC S10 – POLICY DM4 INFRASTRUCTURE PROVISION (P56) AND MAC S11 – SUPPORTING TEXT AT PARA 7.32 - POLICY DM4 INFRASTRUCTURE PROVISION (P57)

Amendment to policy DM4 that '*the Council will seek to ensure that, ~~where appropriate~~ **subject to viability**, the impact of new development is mitigated to ensure that it contributes the regeneration of local communities in Blaenau Gwent*'; and addition to paragraph 7.32 that '***where development has an impact on natural infrastructure, mitigation may be sought for the replacement and/or improvement of features of ecological or geological value***'.

We support the clarification that infrastructure provided by new development should be '*subject to viability*' to ensure development will come forward during the Plan period to contribute towards other aims, including



delivery of housing numbers. We also welcome clarity that, where development will have an impact on natural infrastructure, appropriate mitigation will be supported by the council.

MAC S18 – POLICY DM8 AFFORDABLE HOUSING (P63)

Addition to Policy DM8 that '**subject to viability and where there is evidence of need the Council will seek at least 10% affordable housing on all residential proposals that: a. Contain 10 or more dwellings; or b. Exceeds 0.28ha in gross site area, or c. Exceed the threshold in (a) or (b) above for adjacent sites**'.

Affordable housing calculations subject to viability will ensure deliverable development within the Plan period to contribute to other aims of the strategy, including housing delivery. We support this amendment.

We hope these comments will assist in your consideration of the amended Local Plan, and look forward to your report on the Plan and examination.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Clare Lucey', written over a faint circular stamp.

**Clare Lucey**  
Consultant – Development Consulting