

Amgylchedd a Datblygu Cynaliadwy
Environment and Sustainable Development



Llywodraeth Cymru
Welsh Government

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Your Ref: LFH/20.15
29 February 2012

Dear Lynda

**Blaenau Gwent Local Development Plan
- Consultation on Statement of Focussed Changes**

Thank you for your letter of 18 January and the related documentation you have provided. We note that the Statement of Focussed Changes is accompanied by an updated SA Report which includes consideration of the proposed changes.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. We have considered the proposed Focussed Changes in the light of the representations we made to the deposit plan and in accordance with the consistency and coherence & effectiveness tests (principally in accordance with whether satisfactory regard has been given to national planning policy - test C2). We have also taken account of the important updates and other additions made to the evidence base, especially with regard to population & housing, housing delivery, affordable housing, gypsy & travellers needs and minerals.

Accordingly, the annex includes:

1. representations with regard to five of the proposed changes;
2. three matters raised in our deposit representations that have not been adequately met by the proposed changes.

We have used the deposit representation reference numbers that you have provided in the LDP Report of Representations (submission doc: SD07b), together with the related reference contained in the originating WG deposit letter.

Yours sincerely

Mark Newey
Head of Plans Branch
(*enclosure – annex*)



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Annex to WG letter (29 February 2012) in response to the Blaenau Gwent LDP Statement of Focussed Changes

1. WG representations with regard to five of the proposed changes:

Focussed Change FC1.G (policy SP5) – the figure in part c of policy SP5 for 2006-11 (700) does not reflect the actual figure for completions (507) as provided in the new Housing Delivery Paper Feb2012 (submission doc: SD44). According to this new Paper, this also affects the figure for 2011-16. It is not clear how this actual completion figure for the first 5 years of the plan period will fit with the phasing and timing in the remainder of the plan period, and why the plan hasn't been amended to reflect this completion figure.

Focussed Change FC1.J (para 6.37) - FC1.J both provides a reference to phasing information contained at Chapter 9 Delivery and Implementation, and advises that the phased delivery figures and the phasing of sites are “only indicative”.

WG Deposit Rep 3D.405 is maintained in part – (re WG Deposit Letter Rep B.i.i.b. housing deliverability phasing; & submission doc: SD07b - Report of Representations – page 49).

Reason: FC1.J goes some way to meeting our deposit representation (rep 3D.405), but we consider that a further (minor factual) change is required to include the information contained in Table 3 of the new Housing Delivery Paper Feb2012 (submission doc: SD44) in order that the plan itself clarifies the overall spatial distribution of phased housing development (sites).

In addition, the statement about the phasing being “only indicative” fails to clarify what needs to happen to deliver the strategy.

Focussed Change FC2.F (para 7.62) – FC2.F addresses much of our deposit representation (reps 3D.135, 3D.136 & 3D.137).

However, **WG Deposit Rep 3D.137 is maintained in part** – (re WG Deposit Letter Rep B.ii.iii. affordable housing threshold – commuted sums; & submission doc: SD07b - Report of Representations, page 107).

Reason: The Updated Affordable Housing Background Paper Feb2012 (submission doc: SD43) says at paragraph 3.63 that no contribution is identified on sites under 10 units based upon on viability grounds and because the contribution from the 5-9 bracket would not achieve many new affordable homes. We do not consider the second point to be reasonable grounds given that it is important not to discount any reasonable contribution that would increase affordable housing provision. Affordable housing provision continues to be a priority Ministerial concern and the Welsh Government is keen to maximise the level of provision.

Focussed Change FC15 (monitoring framework) – FC15 does provide improvements to the proposed monitoring framework. **The WG Deposit Rep 3D.145 is maintained** (- re WG Deposit Letter Rep B.i.i.c. housing deliverability monitoring; & submission doc: SD07b - Report of Representations – page 322.)

Reason: Whilst FC15 does provide improvements to the proposed monitoring framework, we suggest that it is for the examination to consider the content.

Minor Change MC15 (para 7.32 - CIL) – MC15 provides limited clarification in relation to CIL. **WG Deposit Rep 3D.128 is maintained** (- re WG Deposit Letter Rep B.i.ii. deliverability infrastructure provision CIL; & submission doc: SD07b - Report of Representations – page 95).

Reason: MC15 fails to provide clarity on what mechanism is to be used for infrastructure delivery. The key question is whether it can be delivered by s106 planning obligations without falling foul of the CIL Regulations.

2. The following three matters raised in WG deposit representations have not been adequately met by the proposed changes:

WG Deposit Rep 3D.127 re WG Deposit Letter Rep B.i.i.a. **housing deliverability past build rates**; (submission doc: SD07b - Report of Representations –page 37).

No specific change is proposed – we recognise the reasoning provided in submission doc: SD07b and maintain that this matter should be considered at examination.

WG Deposit Rep 3D.138 re WG Deposit Letter Rep B.iii.i.a. **gypsies & travellers transit pitches**; (submission doc: SD07b - Report of Representations –page 37).

The majority of our deposit rep 3D.138 is met by FC3A-D and by clarification in updated background papers (SD43 & SD64). However, whilst the situation with regard to transit pitches is clarified in the Gypsy & Traveller Housing Needs Assessment Update Sep2011 (submission doc:SD64), it would be preferable to have brief clarification within the plan itself and the situation be monitored with triggers for review in the monitoring framework.

WG Deposit Rep 3D.153 re WG Deposit Letter Rep D.iii. policy wording **national policy repetition SP10**; (submission doc: SD07b - Report of Representations – page 70).

WG deposit rep 3D.153 cited Policy SP10(a) & (c) as examples of unnecessary national policy repetition and references within plan policy. This representation is maintained.
