

LDP Review Report

Adroddiad Adolygu CDLI



Cyngor Bwrdeistref Sirol

Blaenau Gwent

County Borough Council

Replacement Local Development Plan 2018-2033
Cynllun Datblygu Lleol Newydd 2018 - 2033

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1.0 INTRODUCTION

- 1.1 The adopted Blaenau Gwent Local Development Plan (LDP) sets out the Council's priorities for the development and use of land in the County Borough and its policies to implement them over a fifteen year period up to 2021. The LDP was adopted on 22nd November 2012 and its delivery and implementation has been monitored on an annual basis with the publication of three Annual Monitoring Reports (AMRs) to date.

Need for a Full Review of the LDP

- 1.2 Up to date LDPs are an essential part of a plan-led planning system, providing certainty, rational and consistent decision making, and a reduction in misconceived planning applications and appeals. In order to ensure that there is a regular and comprehensive assessment of whether LDPs remain up to date, Section 69 of the Planning and Compulsory Purchase Act 2004 requires a full review of an LDP to be undertaken at intervals not longer than every 4 years from the date of adoption (Regulation 41). Accordingly, a full review of the adopted Blaenau Gwent County Borough Council LDP was required to commence by 22nd November 2016.

What is involved in a Full Review of the LDP?

- 1.3 A plan review should be based upon the findings of published AMRs, significant contextual changes and updates to the evidence base and on-going surveys. The views of key stakeholders can also make an important contribution to deliberations on what factors should be considered, what changes are required to the LDP and how the LDP should be taken forward.
- 1.4 Targeted engagement with key stakeholders has been undertaken, including both internal engagement with specialist council officers and external engagement with a range of local organisations and agencies that operate or have an interest in Blaenau Gwent. The latter involved both formal consultation on the Review Discussion Paper and the holding of a stakeholder workshop.

Purpose of this Report

- 1.5 The plan review culminates with the production of this Review Report which sets out what has been considered, which key stakeholders have been engaged and what needs to change and why based on evidence. Importantly, this Report makes a conclusion on whether the short form or full revision process should be followed in preparing a revision of the LDP.

Structure of this Report

1.6 This Report is structured as follows:

- **Section 2** sets out the targeted engagement undertaken as part of the full review process. In particular, an overview is given of the method of internal and external engagement, and a summary is provided on the purpose of, and stakeholder responses to, the Review Discussion Paper.
- **Section 3** provides an overview of what has been considered as part of the full review process, with a particular focus on the key findings of the most recent AMR (October 2016), the role of Topic Based Background Papers, and the implications of the Welsh Government Population and Household Projections and national, regional and local planning policy requirements.
- **Section 4** sets out the changes required to the LDP and the reasons why. The LDP's vision, strategic objectives, strategy, policies, allocations and designations are all considered within this section.
- **Section 5** makes a recommendation on the revision process that should be followed in preparing a revised LDP.
- **Section 6** provides an overview of whether the evidence base remains up to date and considers further work that will be required in preparing a revised LDP. In particular, the need to update the sustainability appraisal, the habitats regulations assessment and topic based studies in order to address requirements over an extended plan period is highlighted.
- **Section 7** considers potential opportunities to work with neighbouring local planning authorities in preparing a revised LDP.

2.0 WHO HAS BEEN INVOLVED?

- 2.1 Stakeholders can make a valuable contribution to the review of the Local Development Plan (LDP), helping identify what factors need to be considered and what changes are required to the Plan. The views of stakeholders can also make an important contribution to the deliberations on whether the extent of changes required to the LDP are capable of being undertaken through the short form revision procedure, or whether the changes are significant enough for a full revision of the LDP to be undertaken.
- 2.2 Targeted engagement of key stakeholders has therefore been undertaken, including both internal engagement with specialist council officers and external engagement with a range of local organisations and agencies that operate or have an interest in Blaenau Gwent. Appendix A provides a list of internal and external stakeholders consulted.
- 2.3 Internal engagement focussed on whether LDP policies are functioning effectively or whether they should be revised or removed entirely. Consideration was also given to whether the LDP's reliance on national planning policy in certain areas has proved successful, or whether a specific local policy is required. In addition, information was gathered on current programmes and strategies that will help bring undelivered sites forward and the potential land use requirements of upcoming regeneration initiatives.
- 2.4 External engagement comprised of both consultation on the Review Discussion Paper and the holding of a Stakeholder Workshop. The purpose of the consultation on the Review Discussion Paper was to seek stakeholder's views on whether:
- the main areas of where the LDP is not working have been identified;
 - all significant contextual changes and changes to the evidence base have been identified; and
 - they agree with the suggested changes to the LDP and the recommendation to revise the LDP following the full revision process.
- 2.5 The purpose of the stakeholder workshop was to:
- share information on the full review of the LDP and the work undertaken to date;
 - provide stakeholders with the opportunity to share their views on the Revision Discussion Paper, particularly in respect of relevant contextual changes, key findings, suggested changes to the LDP and the approach to revising the LDP; and
 - address any queries and questions.
- 2.6 Approximately 80 key stakeholders were invited to participate in the review process, which resulted in 13 stakeholders attending the workshop and 6 written consultation

responses being received as part of the consultation exercise. The latter was undertaken between 8th June and 6th July 2017.

2.7 Stakeholder's views are set out in the Review Consultation Report and the Council's response to the written comments received is also included. A summary of the main outcomes from the stakeholder engagement are as follows:

- The majority of stakeholders agreed that the LDP's level of growth should be reconsidered, although it was also recognised that there is a need to maintain a level of growth aspiration in the LDP.
- The majority of stakeholders agreed that the LDP's housing requirement should be reconsidered in light of the Welsh Government's updated population and household projections. However, views were also expressed that any revised housing requirement should not be as low as the forecast and other local factors will need to be taken into account.
- The majority of stakeholders agreed with a continuation of the LDP's current spatial distribution of development.
- The majority of stakeholders agreed that the deliverability of all undelivered allocations should be re-assessed along with affordable housing, brownfield land and housing density targets. It was, however, also recognised that deliverability and viability were not the only factors that need to be considered in determining the aforementioned targets.
- The majority of stakeholders agreed that the approach to town centres needed to be reviewed in order to ensure that they diversify and thrive.
- The majority of stakeholders agreed that the main areas of where the LDP is not working have been identified, although the need to reconsider open space requirements was highlighted during the stakeholder workshop.
- Stakeholders generally agreed with the findings of the review of policy effectiveness, but specific changes to certain policies were also suggested.
- Stakeholders generally agreed that the main changes to planning policy and the evidence base had been considered, along with the main contextual changes. It was, however, indicated that the main changes are difficult to determine and the situation needs to be kept under review. A small number of additional policy documents and contextual changes were also highlighted for potential consideration.
- The majority of stakeholders agreed that it was appropriate to revise the LDP following the full revision process.

3.0 WHAT HAS BEEN CONSIDERED?

3.1 Introduction

3.1.1 The Council has, amongst other things, analysed the findings of preceding Annual Monitoring Reports (AMRs) and prepared a range of topic based background papers which consider in more detail changes in national policy, other key contextual changes and the success or failure in the implementation and delivery of various elements of the Local Development Plan (LDP).

3.1.2 This section sets out the findings of the most recent AMR (September 2016) and provides an overview of the topic based background papers. A more detailed consideration is also given to the implications of the Welsh Government Population and Household Projections and national, regional and local planning policy requirements that have come into effect since the preparation and adoption of the LDP.

3.2 Findings of the Annual Monitoring Report

3.2.1 The most recent AMR (September 2016), which covers the period from 1st April 2015 to 31st March 2016, assesses the extent to which the LDP's strategic objectives are being met through the delivery of the LDP's strategy, policies and allocations. Each LDP strategic objective falls under one of the four key themes, which are used below to highlight those aspects of the LDP that are not working as intended. The delivery of the LDP's Strategy is, however, initially considered in terms of the level of growth anticipated.

Delivering the LDP's Strategy

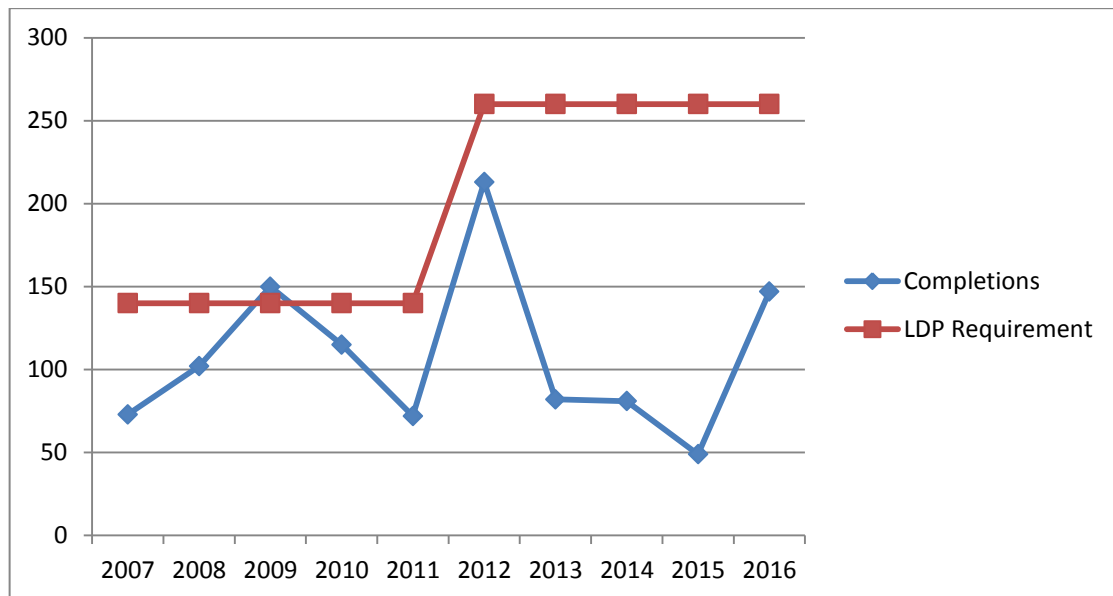
3.2.2 The LDP is now two thirds of the way through the plan period and it is clear that the delivery of the LDP's Strategy is behind target, with only 45% of LDP allocations having been granted planning permission.

Housing

3.2.3 Between 2006 and 2016, 1,084 new dwellings were built which is well below the target of 1,900. Annual housing completions have been below the LDP requirement for all but one year since 2007 (see Figure 1) and, as a consequence, nearly 500 dwellings per annum would need to be delivered over the next five years in order to meet the LDP's housing target of 3,500 dwellings by 2021. This level of housing delivery is considered unachievable and as such, the housing element of the LDP's Strategy will not be delivered by 2021.

3.2.4 It is also important to note that the slow progress in housing allocations coming forward has resulted in the Council having a housing land supply of just 1.35 years in 2016.

Figure 1 – Housing Completions in Blaenau Gwent 2007-2016



Employment

3.2.5 The REGAIN building, located on ‘The Works’ site, is the only development to have been delivered on an employment allocation to date. The building provides just 500 square metres of office (B1) floorspace and covers a wider site area of 0.18 hectares. A further 3.6 hectares of new employment floorspace has also been delivered elsewhere in the County Borough since 2006, in the form of extensions and new industrial units at existing employment sites.

3.2.6 The amount of employment land delivered therefore falls significantly short of the monitoring target of delivering 23.8 hectares of employment land by 2016. Moreover, the likelihood of achieving the longer term target of delivering 50 hectares of employment land by 2021 appears unachievable, given that planning permission has only been granted for a further 2.4 hectares and approximately 0.2 hectares of employment land at allocated and existing employment sites respectively.

Retail

3.2.7 The LDP identifies an overall convenience and comparison retail need of 2,445 and 10,200 square metres respectively. This need was expected to be met through the delivery of a range of retail commitments (sites with planning permission), allocations and redevelopment schemes within existing town centres.

3.2.8 To date, no retail commitments or allocations have been delivered, and the only significant retail development delivered within a town centre has been the 227 square metres extension to the Aldi store in Ebbw Vale. The target of delivering 9,100 square metres of retail floorspace by 2016 has not therefore been met, and it also appears unlikely that the longer term target of delivering 11,500 square metres will be met with only a small number of retail applications granted planning permission.

Theme 1: Create a Network of Sustainable Vibrant Valley Communities

Affordable Housing

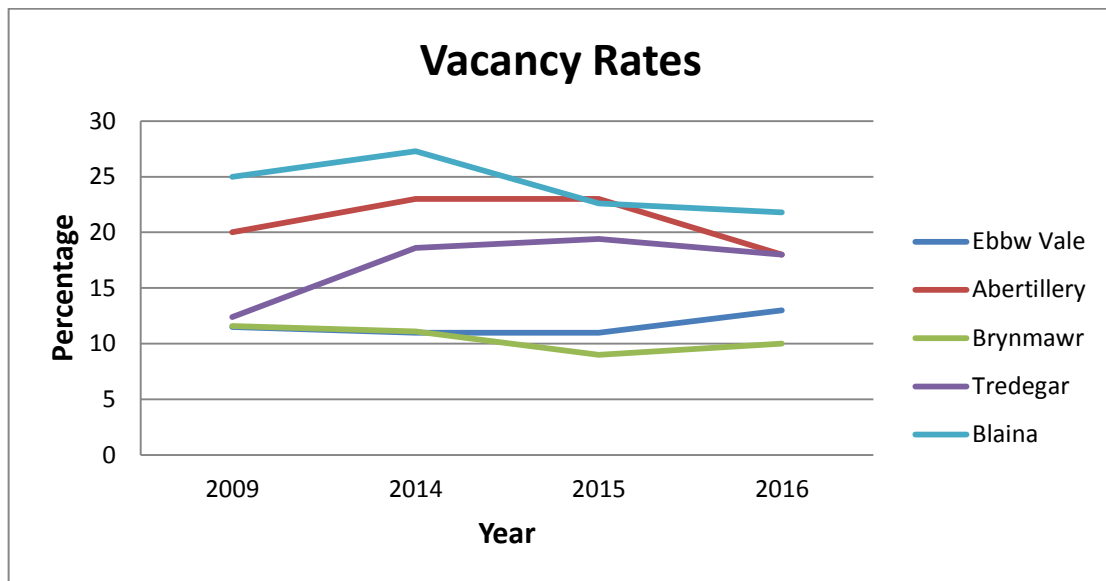
3.2.9 In respect of affordable housing, the LDP aims to deliver 1,000 affordable dwellings by 2021, 335 of which will be through Section 106 agreements. To date, only 428 affordable dwellings have been delivered with just 74.5 dwellings either secured or in the process of being secured by Section 106 agreement. The interim target of delivering 224 affordable dwellings through Section 106 agreements by 2016 has therefore been missed and it is very unlikely that the 2021 affordable dwelling target will be met based on the current performance.

Thriving Town Centres

3.2.10 A key challenge for the LDP was the need to define new roles for town centres in order to reduce the amount of competition between them and to enable them to adapt to the impact of out of town centres and internet shopping. Accordingly, new roles were identified, a retail hierarchy was established and appropriate town centre uses identified. In doing so, it was anticipated that the high vacancy rates would reduce from the 2009 base figure of 15%.

3.2.11 The level of success in reducing the vacancy rate has varied between town centres over the monitoring period (2009 to 2016), ranging from an overall reduction of 3.2% in Blaina to an increase of 5.6% in Tredegar (see Figure 2 below). The average vacancy rate for Blaenau Gwent's town centres was however 0.9% higher in 2016 than in 2009 and 2.2% higher than the Welsh average.

Figure 2 – Vacancy Rates in Blaenau Gwent between 2009 and 2016



Efficient Use of Land

3.2.12 The LDP seeks to achieve the most efficient use of land by delivering the majority of development (80%) on brownfield land, achieving average housing densities of 35 units or more per hectare on all mixed use sites and facilitating four land use reclamation schemes that will bring derelict land back into beneficial use.

3.2.13 In 2016, the target for development on brownfield land was missed with a figure of 74% recorded. While it was not possible to calculate housing density figure for mixed use sites due to no planning permissions granted over the monitoring period, it is worth noting that the average density on permitted allocated sites was 19 units per hectare, which is particularly low. The land reclamation schemes have also not come forward as anticipated, with two schemes missing their delivery target for 2016 and no progress on the other two schemes which are expected to be delivered by 2021.

Theme 2: Create Opportunities for Sustainable Economic Growth and Promote Learning and Skills

3.2.14 The LDP aims to ensure that sufficient employment land is provided to increase employment activity. As indicated above, the amount of new employment land delivered is not meeting the targets set by the LDP. Employment activity related indicators are also showing mixed results. For instance, the target of increasing the employment rate to 66.05% by 2016 has been exceeded, while the target of reducing the percentage of economically inactive wanting a job to 23.95% by 2016 has been missed. Limited progress is also being made on diversifying the local economy since 2008, with a smaller than anticipated increase in the number of service jobs (+100),

no change in the number of construction jobs and a decline in the number of manufacturing jobs (-1000).

Theme 3: Create Safe Healthy and Vibrant Communities and Protect and Enhance the Unique Natural and Built Environment

- 3.2.15 The LDP seeks to progress towards the FIT standard of 2.4 hectares of recreational open space per 1000 of the population in order to meet the monitoring aim of increasing opportunities for people to participate in active and healthy communities. The amount of recreational open space per 1000 of the population for Blaenau Gwent was calculated at 1.11 hectares in 2012, and has actually declined to 1.02 hectares in 2016, resulting in the monitoring aim not being achieved.

Theme 4: Create Opportunities to Secure an Adequate Supply of Minerals and Reduce Waste

- 3.2.16 The percentage of municipal waste reused and recycled/composted in Blaenau Gwent was 49% in 2015/16, which was well below the national target of 58%. This underperformance occurred despite improvements to the waste collection service, the successful delivery of an expanded waste bulking and transfer facility at Silent Valley, and new sub regional residual waste procurement contracts which result in municipal waste being treated at facilities outside the County Borough.

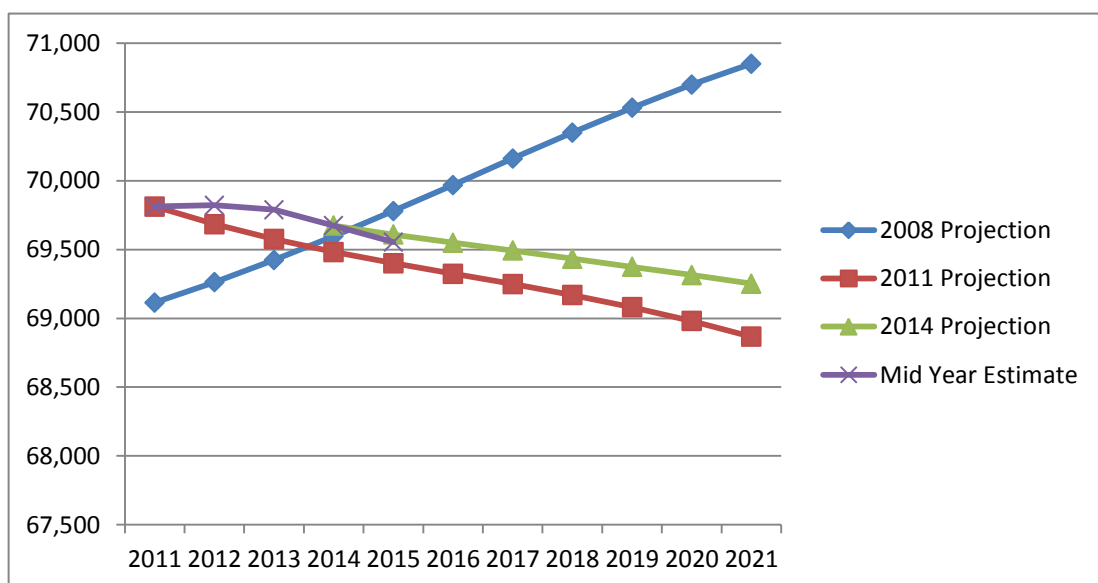
3.3 Topic Based Background Papers

- 3.3.1 Eleven background papers have been prepared and reviewed in order to inform this Review Report. These cover the topic areas of housing, affordable housing, economic development, retail, environment, leisure, tourism, renewable and low carbon energy, transport, waste and minerals. Each background paper sets out significant changes in national policy and other key contextual changes at a national, regional and local level. They also consider the delivery of the LDP's strategy and allocations, and the effectiveness of policies in more detail. Finally, they make a conclusion on which aspects of the LDP are likely to require some form of revision and the reasons why.
- 3.3.2 The findings and conclusions of the background papers have contributed to the suggested changes to the LDP's objectives, spatial strategy, policies, allocations and designations set out in Section 4. Whilst reference is also made to certain elements of the background papers throughout the remainder of this Report, individual topic papers should be reviewed in order to identify all factors that have been considered as part of the review process.

3.4 Welsh Government Population and Household Projections

- 3.4.1 Since the preparation and adoption of the LDP, there have been changes to the evidence base which indicate that the LDP may need to be revised in order to remain appropriate for the area. Most significantly, the Welsh Government has released new population and household projections.
- 3.4.2 The LDP is based on the Welsh Government's 2008 population projections which estimated that Blaenau Gwent's population would increase from 68,914 to 70,849 between 2006 and 2021. The corresponding household projections indicated a need for an additional 3,925 households to meet this growth in population.
- 3.4.3 Since the LDP was adopted, the Welsh Government has released new population projections based on the 2011 census (published 2013), population projections based on mid-year population estimates for 2014 (published 2016) and mid-year population estimates (published annually). The key changes for Blaenau Gwent are as follows:
- The 2011 based projections suggest that the population will fall from 69,812 in 2011 to 68,867 by 2021.
 - The 2014 based projections indicate that population levels will continue to fall from 69,674 to 69,252 between 2014 and 2021.
 - The mid-year estimates for the period 2011 to 2015 identify a steady decline from 69,812 to 69,554, which equates to a 0.11% decline per year over the last four years.
- 3.4.4 The population loss identified above is in contrast to the 2008 based population projections (see Figure 3 below) on which the LDP's Strategy is based. The switch from a projection of population increase to population decline is explained by the trend based nature of the projections: the 2008 based projections reflect a period of economic growth, while the 2011 and 2014 based projections reflect a period of economic decline.

Figure 3 – Comparison of Welsh Government’s 2008, 2011 and 2014 based Population Projections and Mid-year Estimates for Blaenau Gwent

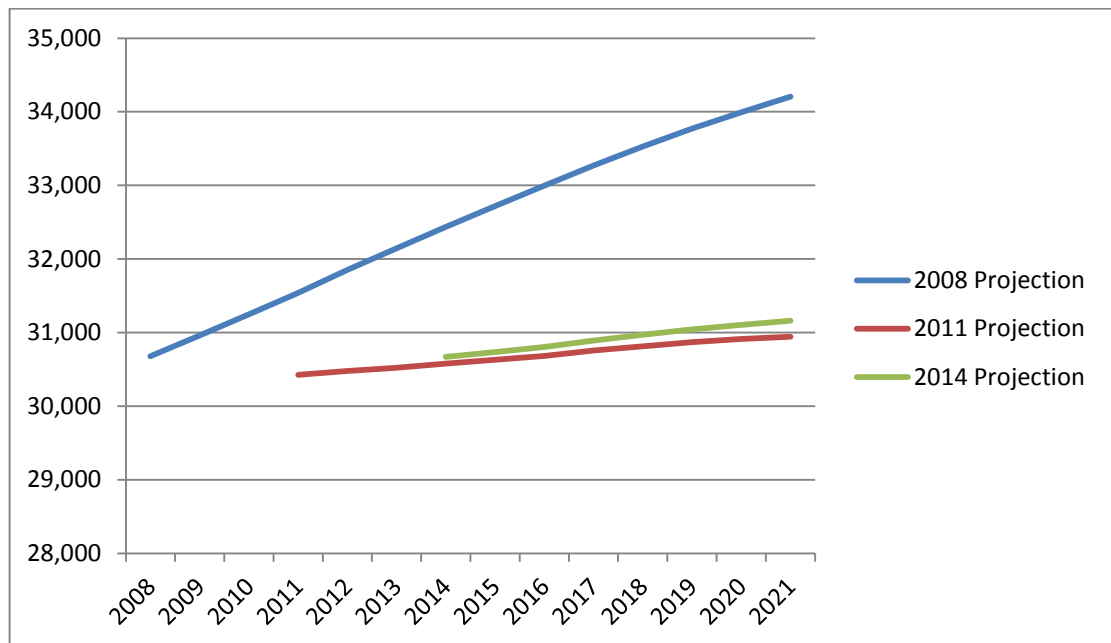


3.4.5 Corresponding household projections have also been released by the Welsh Government based on 2011 Census data (published 2014) and the 2014 population projections (published 2017). The key changes for Blaenau Gwent are as follows:

- The 2011 based projections estimate that the number of households will increase from 30,426 to 30,943 between 2011 and 2021. This suggests that approximately 52 dwellings need to be built per year.
- The 2014 based projections estimate that the number of households will increase from 30,670 to 31,160 between 2014 and 2021. This suggests that approximately 70 dwellings need to be built per year.

3.4.6 The latest Welsh Government household projections indicate a much lower increase in household numbers than the 2008 based projection which has informed the LDP’s Strategy (See Figure 4 below). The LDP’s current housing requirement of delivering 233 dwellings per annum is significantly higher than the 52 and 70 dwellings per annum required by the 2011 and 2014 based projections respectively. It is therefore considered appropriate to reconsider the LDP Strategy’s level of housing growth as part of the preparation of a revised LDP.

Figure 4 – Comparison of Welsh Government’s 2008, 2011 and 2014 based Household Projections for Blaenau Gwent



3.5 National Policy Requirements

3.5.1 Over recent years there have been a number of revisions to Planning Policy Wales (PPW), Technical Advice Notes (TANs) and the publication of new or updated Welsh Government practice guidance that can be used to prepare an evidence base for the LDP. Four policy areas that have been directly affected by these changes are: economic development, renewable and low carbon energy, the Welsh language and waste.

Economic Development

3.5.2 Chapter 7 of PPW has been revised and TAN 23: Economic Development (2014) has been published along with practice guidance on building an economic development evidence base. The latter provides advice and a methodology to assist local planning authorities in undertaking employment land studies at both a local and larger than local level. New requirements that make the existing evidence base out of date include the need to work more closely with neighbouring authorities and other stakeholders to plan strategically for employment land provision, and the need to identify separate land provision targets for B1 and B2/B8 uses separately (paragraph 7.5.1).

Renewable and Low Carbon Energy

3.5.3 The Welsh Government’s best practice guidance on renewable and low carbon energy was refreshed in 2015 in order to update data sources and include

consideration of solar farm developments as a stand-alone technology. The revised toolkit also provides new advice on how to translate renewable energy assessments into policies which guide appropriate renewable and low carbon energy development to the most suitable locations.

- 3.5.4 The renewable energy assessment, which informed the policies within the LDP, was based on the Welsh Government's best practice guidance, and will therefore need to be updated to address the new requirements identified above.

Welsh Language

- 3.5.5 Chapter 4 of PPW has been updated to reflect the requirements of Sections 11 and 31 of The Planning (Wales) Act 2015, which relate to the consideration of the Welsh language in on-going surveys and the preparation of an LDP, and the determination of a planning application respectively. The Welsh Government also published practice guidance in 2014 to assist Local Planning Authorities (LPAs) with the consideration of Welsh language issues during the preparation, monitoring and review of LDPs.

- 3.5.6 PPW states that LPAs must consider the likely effects of their development plan on the use of the Welsh language in the Sustainability Appraisal of their plans, and should keep under review the extent to which the Welsh language is used in their area (paragraph 4.13.3). Moreover, TAN 20: Planning and the Welsh Language (2013) also indicates that all LDPs should include a short reasoned justification of the regard had to the needs and interests of the Welsh language, and an explanation of how any policies relating to the Welsh language interact with other plan policies (paragraph 3.7.2).

Waste

- 3.5.7 Chapter 12 of PPW and TAN 21: Waste (2014) have been revised to reflect changes to the waste policy context set out in the revised Waste Framework Directive (Directive 2008/98/EC on waste) and Welsh Government policy *Towards Zero Waste* (TZW) and the *Collection, Infrastructure and Markets Sector* (CIMS) Plan. These changes have been made to update the way in which the planning process facilitates the delivery of sustainable waste management infrastructure. It also takes into account specific principles central to sustainable waste management, including the waste hierarchy, self-sufficiency and the concept of the nearest appropriate installation.

- 3.5.8 PPW indicates that LPAs need to have particular regard to the aspirations and requirements of TZW and the CIMS Plan, information within waste planning monitoring reports and waste management priorities relevant to the local area (paragraph 12.6.1). In addition, LDPs should identify suitable locations for

accommodating sustainable waste management facilities (paragraph 12.6.2) and secure opportunities to reduce or recycle waste as part of the design, construction and operation of buildings (paragraph 12.6.3).

- 3.5.9 Amongst other things, TAN 21: Waste (2014) sets out regional annual monitoring arrangements which culminate with the publication of waste planning monitoring reports (see Section 3). The intention of waste monitoring is to enable both Welsh Government and LPAs to take a strategic overview of issues and trends in the waste sector to help inform local development plans and decisions on planning applications. Regional waste plans, which informed the preparation of the adopted LDP, no longer have effect.

3.6 Regional Policy Requirements

- 3.6.1 Minerals and waste are policy areas where a regional approach is taken to the identification of requirements for LDPs. Changes have occurred in both policy areas since the preparation and adoption of the LDP.

Minerals

- 3.6.2 The *Regional Technical Statement (RTS) on Aggregates*, which informed the LDP, was reviewed and updated in 2014. The *RTS 1st Review* (2014) provides updated recommendations to mineral planning authorities on, amongst other things, the quantities of aggregate which need to be supplied from their area (apportionments) and the tonnage of any new allocations which may need to be made in their LDP to ensure that adequate provision is maintained throughout the relevant plan period.
- 3.6.3 Blaenau Gwent's annualised apportionment for the future provision of land won-primary aggregates is 0.17 million tonnes per year. This equates to 4.25 million tonnes of crushed rock over the 25 year period covered by the RTS (up to 2036). This compares with an existing landbank of 3 million tonnes of crushed rock (as of 31st December 2010).
- 3.6.4 In order to address the resulting crushed rock shortfall, new allocations totalling at least 1.25 million tonnes need to be identified within the LDP. This requirement is higher than the 0.76 million tonnes identified by the original RTS and will need to be met over an extended plan period. Whilst the 'Preferred Areas' identified within the LDP have the potential to provide amounts of crushed rock well in excess of this new requirement, the likelihood of planning applications for new and/or extended quarries coming forward in the near future should be kept under review.

Waste

- 3.6.5 As indicated in paragraph 3.5.9 above, Regional Waste Plans, which set out the land requirements for new waste management facilities, no longer have effect. Waste

monitoring reports are now intended to enable both Welsh Government and local planning authorities to take a strategic overview of issues and trends in the waste sector to help inform LDPs and decisions on planning applications for waste related developments.

3.6.6 The *Interim Progress Report: Waste Planning Monitoring – South East Wales (2013/14)* states that:

- There is no further need for landfill capacity within the South East region.
- Any proposals for further residual waste treatment should be carefully assessed to ensure that the facility would not result in overprovision. There are a number of planning consents for the recovery of residual waste within the region which, if all implemented, would result in an overprovision of recovery capacity.

3.6.7 As there is currently no requirement for new regional waste management facilities within Blaenau Gwent, the related waste management policies should be reconsidered.

3.7 Local Policy Requirements

3.7.1 A number of local plans, strategies and assessments have been revised or replaced since the preparation and adoption of the LDP. Of particular importance to local policy requirements are the *South East Wales Local Transport Plan (January 2015)* and the *Gypsy & Traveller Accommodation Assessment (2015)*, which are discussed in more detail below. The *Blaenau Gwent Single Integrated Plan (2013)* is also considered within Section 4.

3.7.2 Other local plans, strategies and assessments that have been reviewed and will help inform the preparation of a revised LDP include the following: *More than Homes – A Local Housing Strategy for Blaenau Gwent 2013-2018*, *Blaenau Gwent Local Service Board: Strategy for Older People 2015-2017*, *Local Flood Risk Management Strategy (2013)*, *Flood Risk Management Plan (2015)*, *Blaenau Gwent Play Sufficiency Assessment and Action Plan 2016-2019*, *Caerphilly and Blaenau Gwent Local Development Strategy – LEADER 2014-2020 (2014)* and *Blaenau Gwent Destination Management Plan 2016-2019*.

South East Wales Valleys Local Transport Plan (January 2015)

3.7.3 In 2015, the South East Wales Transport Alliance was disbanded and guidance was published by Welsh Government requiring local transport authorities to produce Local Transport Plans. In response, Blaenau Gwent, Caerphilly, Merthyr Tydfil, Rhondda Cynon Taf and Torfaen have collaboratively prepared a joint plan. The latter sets out the vision and objectives for transport in the South East Wales Valleys area and provides a short and long term programme of interventions to work towards

achieving those goals. The short term programme sets down those schemes that are priorities for the next 5 years up to 2020, while the longer term programme identifies aspirations up to 2030.

- 3.7.4 The majority of Blaenau Gwent related schemes are identified in the LDP. Two additional schemes need to be facilitated through a revised LDP, namely, the cycle route between Sirhowy Valley, Bedwellty Pits and Hollybush and the bus rapid transport corridor between Aberdare and Abergavenny. A further scheme needs to be amended, namely, the bus priority corridor improvement between Abertillery, Blackwood and Newport as the LDP currently starts the improvement at Brynmawr.

Gypsy & Traveller Accommodation Assessment (2015)

- 3.7.5 The *Gypsy & Traveller Housing Needs Assessment* that informed the adopted LDP was produced in 2011 and identified the need for a further 4 pitches in Blaenau Gwent. In 2015, the Council updated the *Gypsy and Traveller Accommodation Assessment* in order to meet statutory requirements under the Housing Wales Act 2014. The updated assessment identifies the need for 12 new pitches in the plan period, which will need to be addressed as part of the preparation of a revised LDP.

4.0 WHAT CHANGES ARE REQUIRED AND WHY?

4.1 Vision and Strategic Objectives

4.1.1 The Vision of the LDP provides a clear expression of what the County Borough should look like in 2021, and it is essential that it remains relevant to local needs and aspirations beyond the current plan period. The LDP Vision was developed through collaboration with key stakeholders and was informed by a range of plans and strategies, including the Council's *Community Strategy*. The LDP's Vision states that:

Through collaborative working, by 2021, Blaenau Gwent will become a network of sustainable, vibrant valley communities, where people have the skills, knowledge and opportunities to achieve a better quality of life and residents will live in safe, healthy and thriving communities, with access to a range of good quality affordable homes and thriving town centres. Its unique environment, cultural and historic identity will be protected and enhanced to create a place where people want to live, work and visit.

4.1.2 Since the adoption of the LDP in 2012, the *Community Strategy* has been supplemented by the publication of the *Blaenau Gwent Single Integrated Plan (SIP)* which was published in 2013. The SIP provides a shorter term four year 'action plan' on how the overarching vision for the County Borough will be worked towards and what the priorities will be between 2013 and 2017.

4.1.3 Given that the overarching vision of the *Community Strategy* remains unchanged, it is not considered that the LDP's vision currently requires revision. Moreover, the LDP's themes and objectives have been considered against the updated themes and outcomes of the *SIP*, and it has been found that they are broadly compatible with no significant revisions required at this time to improve alignment.

4.1.4 Notwithstanding the current compatibility between the LDP and *Community Strategy/SIP*, it is acknowledged that the latter will shortly be replaced by a Local Well-Being Plan (LWBP) for the County Borough, which is a requirement of the Well-being of Future Generations Act (2015). The latter places a duty on public bodies, including local authorities, to carry out sustainable development and to set objectives which maximise its contribution to achieving each of the seven well-being goals. Each public body must take all reasonable steps, in exercising its function, to meet those objectives.

4.1.5 An assessment of whether the LDP contributes to the achievement of the well-being goals has therefore been undertaken by considering how closely they align with the key themes of the LDP. It has been found that all seven well-being goals are already embedded within the LDP, aligning closely with one or more of the LDP's key themes.

4.1.6 The Well-being of Future Generations Act (2015) Act also establishes Public Service Boards (PSBs) for each local authority area in Wales who must improve economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals. PSBs are responsible for preparing and publishing a Local Well-being Plan (LWBP) which sets out its objectives and the steps it will take to meet them. The Blaenau Gwent PSB has already undertaken a local Well-being Needs Assessment and the Well-being Plan is anticipated to be in place by April 2018. A revised LDP will therefore need to complement the LWBP and ensure that it expresses, in appropriate land use terms, those elements of the LWBP that relate to the development and use of land.

4.1.7 An assessment of whether the LDP's strategic objectives require amending was also undertaken as part of the wider LDP review work. It has been found that minor amendments will be required to the majority of strategic objectives to update the reference to the plan period, and more specific changes will be required to the following strategic objectives:

- Strategic Objective 1 may require updating depending on the outcome of the reassessment of undelivered retail commitments and allocations and the revised retail strategy.
- Strategic Objectives 2 and 3 will need to be updated in line with a revised strategy, population and household projections.
- Strategic Objective 3 will need to be updated in line with a revised affordable housing and gypsy and traveller accommodation need requirement.
- Strategic Objective 9 will need to be updated in line with a revised employment land requirement.
- Strategic Objective 10 will need to be updated to reflect the successful delivery of the 'Learning Zone' on 'The Works' site.
- Strategic Objective 15 needs to be updated to reflect the apportioned tonnage of aggregates required by the most up-to-date regional technical statement.

4.2 Spatial Strategy

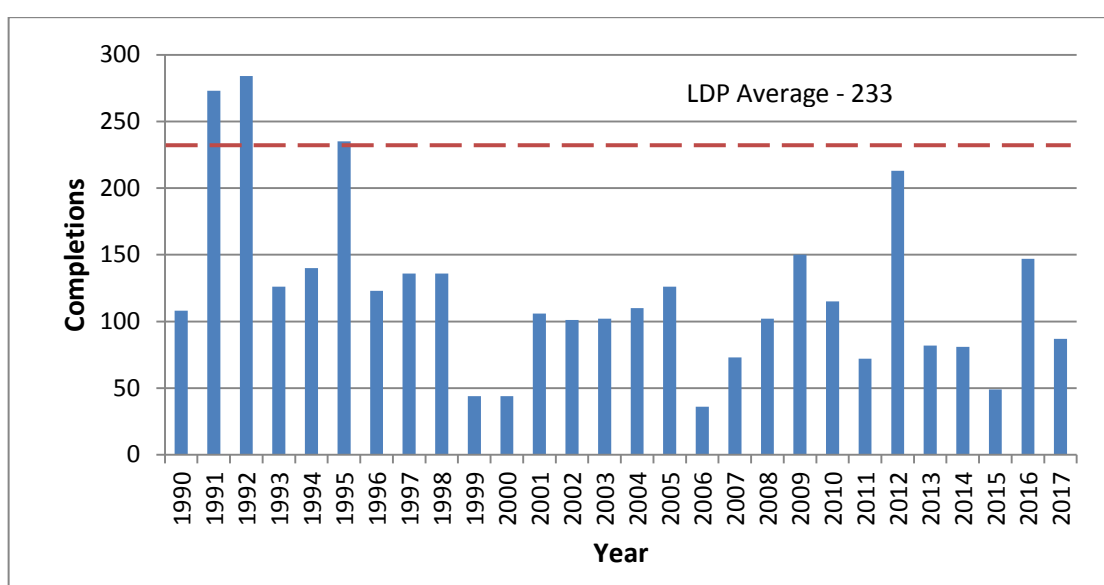
4.2.1 The LDP is based on the 'Spatial Strategy of Growth and Regeneration' which seeks to regenerate the area through building a network of district hubs around the principal hub of Ebbw Vale, whilst recognising that there is a north south divide in terms of opportunities for growth. Essential to the success of this Strategy is the need to ensure good connectivity between the principal hub of Ebbw Vale and the district hubs of Tredegar, Brynmawr and Abertillery, and good accessibility between the hubs and the areas that they serve. In the case of the Upper Ebbw Fach area, the Brynmawr District Hub is also supported by the Local Town Centre of Blaina.

Level of Growth

Housing

- 4.2.2 The LDP's strategy seeks to deliver 3,500 dwellings by 2021 in order to meet an increase in the population to 70,849 by 2021. This equates to an average build rate of 233 dwellings per annum. Whilst this average build rate has been exceeded in the past, most notably during the first half of the 1990s, the LDP's level of housing growth is ambitious when compared to the level of dwelling completions experienced in the years leading up to the start of the plan period in 2006 (see Figure 5 below).

Figure 5 – Dwelling Completions in Blaenau Gwent 2001 -2017



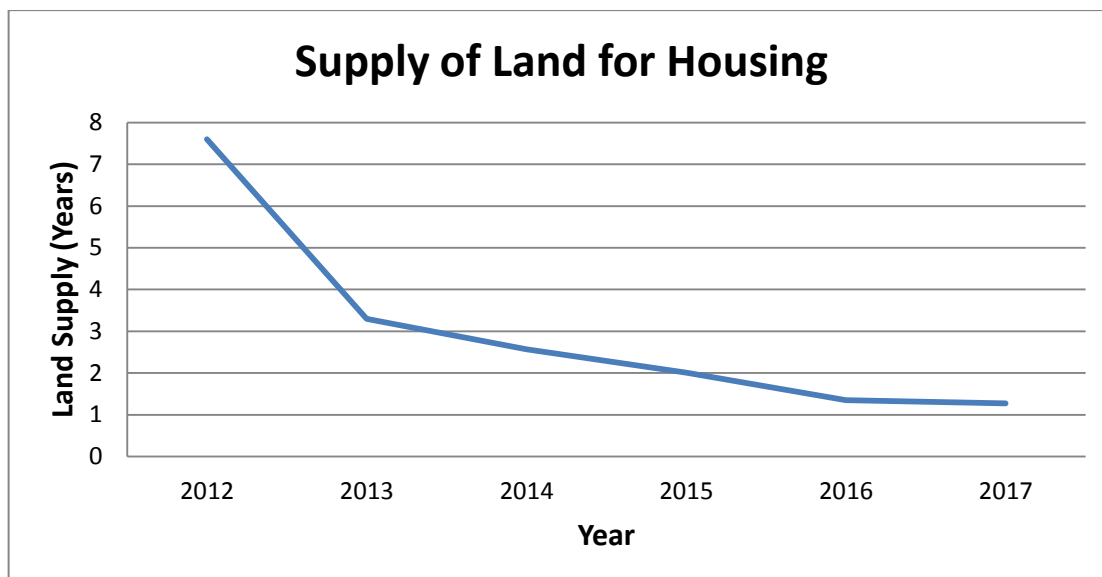
- 4.2.3 As of 1st April 2017, 1,171 dwellings had been delivered within the County Borough, which represents approximately a third of the housing requirement (3,500) anticipated to be delivered by 2021. Whilst this represents a significant number of dwellings, the LDP is now in its final phase (2016-2021) and it is therefore apparent that the LDP's housing requirement will not be met. It can also be seen from Figure 5 above that housing delivery has been below the average annual housing requirement (233) every year over the plan period to date, with 2012 being the only year when the number of dwelling completions was reasonably close (213) to the requirement. All other years have been less than half of the housing requirement.
- 4.2.4 The failure to deliver the high levels of housing growth is primarily attributable to the impact of economic recession on the operations of the housing and commercial markets. In particular, the recession resulted in housing developers contracting their

operations and focussing their interests in areas that offered more secure prime market opportunities, such as Cardiff and the M4 Corridor.

- 4.2.5 Whilst the recession officially ended in 2009, a period of weak growth was experienced for a number of years with quarter falls in growth experienced in to 2012. A period of economic growth has however been experienced post 2012 and the national economy has performed better than expected in the aftermath of the referendum result to leave the European Union.
- 4.2.6 Despite the improved economic conditions, Blaenau Gwent has not experienced a positive trend in increasing housing delivery post 2012 (see Figure 5 above) and viability issues remain as a result of low house price values, a perceived lack of demand by the housing industry and the recent requirement to install sprinklers in new houses. As a consequence, Davies Homes is the only regional housebuilder currently operating within the County Borough and the last major national housebuilder to develop a site was Redrow Homes at the Old 45 Yard in Ebbw Vale. Housing Development at this site commenced prior to the economic recession and was completed in 2012.
- 4.2.7 In the short term, the local economy is unlikely to experience a significant boost from wider economic improvements given the uncertainties surrounding the 'Brexit' negotiations. There is, however, local evidence indicating that the local housing market is improving with increases in sales values noted on local housing developments, such as the Peacehaven site in Tredegar. Interest from national housebuilders is also emerging with a number of planning applications for housing development within the Ebbw Vale area anticipated in the near future.
- 4.2.8 Public sector investment could also help build upon these positive signals within the local housing market, with interventions such as the £1.2 billion Cardiff Capital Region City Deal potentially providing funding to stimulate the delivery of undelivered housing allocations within the County Borough. The South East Wales Valleys Metro, which will receive a significant amount of City Deal funding, also has the potential to make Blaenau Gwent more attractive to housing developers by improving transport connectivity within the Region. It is however recognised that the City Deal aims to improve economic conditions over a 20 year period and the Metro's planned improvements to the rail network will initially focus on the "core valleys network" which lie outside the County Borough. It therefore appears unlikely that these significant public sector investment programmes will stimulate housing delivery to a level sufficient to meet the requirements of the LDP's strategy in the short term.
- 4.2.9 Planning Policy Wales Edition 9 (November 2016) states that local planning authorities must ensure that sufficient land is genuinely available or will become

available to provide a 5 year supply for housing (paragraph 9.2.3). The Council has not achieved a 5 year land supply for housing since the LDP was adopted in 2012. Moreover, since 2012, it has decreased year-on-year to its current figure of 1.27 years in 2017 (see Figure 6 below).

Figure 6 – Supply of Housing Land between 2012 and 2017



4.2.10 It is important to note that the ability to maintain a 5 year land supply is one of the key factors in determining how the LDP should be revised. Furthermore, where the housing land supply figure is below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications for housing provided that the development would otherwise comply with the development plan and national policies (Paragraph 6.2 of Technical Advice Note 1 – Joint Housing and Land Availability Studies (January 2015)). Given that the Council only has a 1.27 year housing land supply, considerable weight has to be given to any speculative housing development that meets the aforementioned criteria. This situation has the potential to undermine the plan-led planning system, increasing uncertainty for developers and the public about the type development that will be permitted at a particular location.

4.2.11 The inability to meet the LDP’s housing requirement and the resulting failure to maintain a 5 year housing land supply indicates that the level growth required by the LDP’s Strategy needs be reconsidered. Moreover, all undelivered housing allocations within the LDP will need to be re-assessed to ensure that development on these sites remains viable and deliverable over an extended plan period. This could result in certain housing allocations being removed from the LDP and new sites being allocated to meet local housing needs over an extended plan period.

Employment

- 4.2.12 In order to ensure that sufficient employment land is provided to increase employment activity and economic development needs, the LDP allocates 50 hectares of new employment land (B use class). As highlighted in Section 3 above, the amount of employment development delivered since the start of the plan period in 2006 has not been sufficient to meet the requirements of the LDP's strategy. By the end of March 2016, just 0.18 hectares of allocated employment land had been delivered, with a further 35,861.5 3.6 hectares of new employment floorspace delivered elsewhere in the County Borough. The target of delivering 23.8 hectares of employment land by 2016 was therefore missed, and it appears very unlikely that the target of delivering 50 hectares of employment land by 2021 will be achieved when the amount of employment development either under construction or with the planning permission is taken into account.
- 4.2.13 There are a number of positive contextual changes that have the potential to be a catalyst for economic development within County Borough, including the Cardiff Capital Region City Deal, the South East Wales Metro, Enterprise Zones, and the on-going dualling the A465. The City Deal is anticipated to deliver £25,000 new jobs across the region and leverage an additional £4 billion of the private sector funding over its 20 year lifespan, while the Enterprise Zones will be the focus of a £100 million Welsh Government investment in an automotive business park over a 10 year period. In combination with the proposed transport infrastructure improvements, these public sector investments in the regional and local economy should stimulate economic development within the County Borough, facilitating the delivery of allocated employment sites and enabling the expansion of existing businesses over the longer term.
- 4.2.14 Notwithstanding the opportunities presented by the above public sector interventions, it should be noted that it appears unlikely that the Circuit for Wales development will be taken forward in light of the Welsh Government's decision to not provide financial support for the project. The economic outlook also remains uncertain while the future relationship between the UK and European Union is negotiated.
- 4.2.15 All undeveloped employment sites should therefore be reassessed as part of the preparation of a revised LDP to ensure that they are deliverable over an extended plan period. A reconsideration of the overall supply of employment land will also need to form part of this work to ensure that the level of provision is not wholly out of sync with the level of housing growth and the needs of the employment market, and that the development of employment sites for other land uses is not being frustrated.

Retail

- 4.2.16 In order to maintain thriving town centres and ensure that future retail needs are met in a co-ordinated and sustainable manner, the LDP establishes a retail hierarchy and identifies land for 10,200 square metres and 2,445 square metres of comparison and convenience floorspace respectively, over the plan period. This need was expected to be met through the delivery of a range of retail commitments (sites with planning permission), allocations and redevelopment schemes within existing town centres.
- 4.2.17 As indicated in Section 3 above, retail commitments have not come forward as anticipated despite having planning permissions in place. In addition, no planning applications have been received in respect of allocated retail proposals and it remains uncertain as to whether they will be delivered by 2021.
- 4.2.18 The LDP also anticipates that 585 square metres of convenience floorspace and 1,060 square metres of comparison floorspace will be met through redevelopment schemes within town centres. To date, just one development has been delivered, relating to a 227 square metre extension to the Aldi Store in Ebbw vale. Three other edge of centre retail developments have also been granted planning permission within the Brynmawr area, with a combined floorspace of 2,756.5 square metres.
- 4.2.19 The delivery target for 2016 (9,100 square metres) has therefore been missed, and it appears very unlikely that the longer term target of delivering 11,500 square metres of retail floorspace by 2021 will be achieved. All undeveloped retail commitments and proposals should therefore be reassessed as part of the preparation of a revised LDP to ensure that they are viable and deliverable when economic conditions improve. The retail evidence base will also need to be updated in order to identify the comparison and convenience retail floorspace requirements over an extended plan period, taking into account, amongst other things, future levels of population and expenditure growth, shopping patterns and expenditure retention rates.

Spatial Distribution

- 4.2.20 The LDP's strategy recognises that there is a north south divide in terms of opportunities for growth and, accordingly, splits the County Borough into a Northern Strategy Area (NSA) – Growth and Regeneration and a Southern Strategy Area (SSA) – Regeneration. The NSA includes the three hub areas of Tredegar, Ebbw Vale and Upper Ebbw Fach, and emphasises sustainable growth and regeneration with most of the growth concentrated on the principal hub area of Ebbw Vale. The SSA covers the lower Ebbw Fach Valley and focusses on regenerating the area and maximising the potential offered by the area's unique setting and cultural qualities.

Housing

- 4.2.21 The LDP focusses the majority of housing development within the NSA (2,853 dwellings), with more limited housing growth in SSA (228 dwellings). To date, both areas are behind target on the delivery of housing, although the NSA (58% of dwellings delivered) is faring better than the SSA (49% of dwellings delivered).
- 4.2.22 Within the NSA, the percentage share of housing developments delivered in the hub areas has been higher in Tredegar and Upper Ebbw Fach and lower in Ebbw Vale than anticipated (see Table 1 below). This is considered to be primarily due to Ebbw Vale's reliance on the delivery of larger, regeneration sites for housing, which have not come forward as anticipated in the second phase of the Plan; it is not considered to be a result of the Tredegar and Upper Ebbw Fach areas demonstrating higher levels of deliverability. Development viability work across housing sub-markets within the County Borough has indicated that the Ebbw Vale housing sub-market is the most viable, followed by the Brynmawr/Rassau sub-market and, finally, Abertillery/Blaina and Tredegar sub-markets.
- 4.2.23 It therefore appears that whilst the level of housing growth is not being delivered, future housing development should continue to be directed towards the NSA with the majority of the growth concentrated on the principal hub area of Ebbw Vale.

Table 1 – Percentage of housing developments delivered in hub areas in accordance with the LDP's phasing

Area	Number of Houses Delivered from April 2006 to April 2021	Percentage	Expected Outcome by 2016
Ebbw Vale	405	37%	55%
Tredegar	340	31%	25%
Upper Ebbw Fach	232	22%	10%

Employment

- 4.2.24 The majority of employment allocations are also located within the NSA (48.5 ha) with just one allocation in SSA (1.5 ha). As indicated above, just one employment allocation has been delivered to date in the NSA, which suggests that the employment market is weak across the entire County Borough. There is no evidence to suggest that more employment land would be delivered if it were located in the SSA and regard must be had to the targeted support and investment through Enterprise Zone designations and the proposed £100 million investment in an automotive business park within the NSA. Accordingly, as with housing development, it is considered that future employment development should continue to be focused on the NSA.

Retail

- 4.2.25 All retail proposals are allocated within Ebbw Vale Town Centre and all retail commitments fall within the wider Ebbw Vale area. The LDP's proposals and commitments reflect the LDP's Strategy, which places Ebbw Vale at the top of the retail hierarchy as the Principal Town Centre.
- 4.2.26 The prevailing economic conditions are considered to be the primary reason for the failure to deliver the LDP's retail commitments by 2016 and the limited progress on bringing LDP allocations forward. Moreover, the Wales Spatial Plan continues to identify Ebbw Vale as a key settlement that has a critical role to play in the success of the Capital Region, and key regeneration initiatives remain focussed on the Town. It is therefore considered that future retail growth should continue to be directed towards Ebbw Vale, particularly the Town Centre.

4.3 Policies, Allocations and Designations

- 4.3.1 The full review has involved consideration of the findings of preceding annual monitoring reports, changes in national policies and other key contextual changes. External and internal engagement has also been undertaken with a range of key stakeholders and specialist council officers, focussing on, amongst other things, LDP policy effectiveness and the potential need to revise, remove or add a policy. The findings of this work are set out in the Topic Based Background Papers and the Review Consultation Report.
- 4.3.2 The following tables provide an overview of whether an LDP policy, allocation or designation is being delivered or functioning effectively, or whether some form of revision or removal is likely to be required based on the analysis undertaken. The analysis undertaken to date is not however considered to be definitive and further consideration will be given to revising or removing LDP policies as part of the preparation of a revised LDP. The latter will also consider the appropriateness of additional policies that have been recommended as part of the review process, which are not identified below.

Table 2 – Strategic Policies

Strategic Policies	Comment
SP1 Northern Strategy Area – Sustainable Growth and Regeneration	Remains broadly appropriate but should be reviewed as part of the reconsideration of the growth and regeneration strategy.
SP2 Southern Strategy Area –	Remains broadly appropriate but should

Regeneration	be reviewed as part of the reconsideration of the regeneration strategy.
SP3 The Retail Hierarchy and Vitality and Viability of the Town Centres	Revise to reflect any change in approach to town centres and updated retail requirements over an extended plan period.
SP4 Delivering Quality Housing	Revise to reflect the reconsideration of the development strategy, viability of housing allocations, affordable housing requirements and gypsy and traveller need.
SP5 Spatial Distribution of Housing Sites	Revise to reflect the reconsideration of the development strategy and housing requirement over an extended plan period.
SP6 Ensuring Accessibility	Functioning effectively – minor amendments required to reflect contextual changes.
SP7 Climate Change	Functioning effectively – minor amendments required to reflect the varying success on the delivery of district heating networks on strategic sites.
SP8 Sustainable Economic Growth	Revise to reflect the reconsideration of the development strategy and employment land requirement over an extended plan period.
SP9 Active and Healthy Communities	Functioning effectively – minor amendments required to reflect contextual changes.
SP10 Protection and Enhancement of the Natural Environment	Functioning effectively – minor amendments required to reflect contextual changes.
SP11 Protection and Enhancement of the Historic Environment	Revise to ensure consistency with national policy.
SP12 Securing an Adequate Supply of Minerals	Revise to reflect apportionment requirements identified in the most up-to-date Regional Technical Statement.
SP13 Delivering Sustainable Waste Management	Revise to reflect changes in national policy and advice.

Table 3 – Development Management Policies

Development Management Policies	Comment
DM1 New Development	Revise to reflect changes in national policy and improve clarity.
DM2 Design and Placemaking	Functioning effectively – minor amendments required to improve clarity.
DM3 Infrastructure Provision	Functioning effectively – further consideration should be given to the prioritisation of different types of infrastructure provision.
DM4 Low and Zero Carbon Energy	Revise to reflect the need to change specific criterion and address standalone low and zero carbon energy developments.
DM5 Principal and District Town Centre Management	Revise to reflect any change in approach to town centres.
DM6 Management of Blaina Town Centre	Revise to reflect any change in approach to town centres.
DM7 Affordable Housing	Revise, if necessary, as part of the reconsideration of housing allocation viability and affordable housing requirements and improve effectiveness in addressing extensions to housing sites.
DM8 Affordable Housing Exceptions	Functioning effectively.
DM9 Caravan Site for Gypsies and Travellers	Revise to improve clarity.
DM10 Use Class Restrictions	Revise, if necessary, as part of the reconsideration of the degree of flexibility in the type of uses allowed on primary and secondary employment sites.
DM11 Protection of Community and Leisure Facilities	Functioning effectively – additional guidance on defining ‘surplus to requirements’ would assist with interpretation of policy.
DM12 Provision of Outdoor Sport and Play Facilities	Revise, if necessary, as part of the reconsideration of development thresholds and reassessment of local standards.
DM13 Protection of Open Space	Functioning effectively - additional guidance on defining ‘surplus of such facilities in the locality’ would assist

	with interpretation of policy.
DM14 Biodiversity Protection and Enhancement	Revise to address undesignated sites that meet SINC criteria.
DM15 Protection and Enhancement of the Green Infrastructure	Revise to improve effectiveness.
DM16 Trees, Woodlands and Hedgerows Protection	Revise to improve clarity.
DM17 Buildings and Structures of Local Importance	Functioning effectively.
DM18 Criteria for the Assessment of Mineral Applications	Revise to improve clarity.
DM19 Mineral Safeguarding	Revise to improve clarity.
DM20 Waste	Revise or potentially remove as result of changes to national policy and advice.

Table 4 – Allocations and Designations

Allocations and Designations	Comment
SB1 Settlement Boundaries	Revise to provide greater clarity on appropriate types of development in the countryside
MU1 Ebbw Vale Northern Corridor	Remains broadly appropriate but should be reviewed alongside all undelivered allocations to ensure that it remains deliverable over an extended plan period.
MU2 'The Works	Revise – certain allocations have been delivered and undelivered allocations should be reviewed to ensure that they remain deliverable over an extended plan period.
MU3 NMC Factory and Bus Depot	Remains broadly appropriate but should be reviewed alongside all undelivered allocations to ensure that it remains deliverable over an extended plan period.
AA1 Action Area	Remains broadly appropriate but should be reviewed to ensure that allocations remain deliverable over an extended plan period, taking into account updated retail requirements.
R1 Retail Allocations	Remains broadly appropriate but should be reviewed in the context of the potential loss of commitments, the need

	for allocations to remain deliverable over an extended plan period and updated retail requirements.
H1 Housing Allocations and H2 Housing Commitments	Revise – certain housing sites have been delivered and a review of undeveloped allocations and commitments is required taking into account updated housing requirements.
GT1 Gypsy and Traveller Accommodation	Revise to address additional Gypsy and Traveller need.
T1 Cycle Routes	Revise – certain cycle routes have been delivered, a review of undelivered routes is required and new cycle and active travel routes need to be added.
T2 Rail Network and Station Improvements	Revise – certain rail improvements have been delivered and a review of undelivered rail improvements is required.
T3 Safeguarding of Disused Railway Infrastructure	Functioning effectively.
T4 Improvements to Bus Services	Revise – certain bus improvements have been delivered, a review of undelivered bus improvements is required and new bus improvements need to be added.
T5 New Roads to Facilitate Development	Remove – new roads delivered.
T6 Regeneration Led Highway Improvements	Revise – certain highway improvements have been delivered and a review of undelivered highway improvements is required.
EMP1 Employment Allocations	Revise – an employment allocation has been delivered and a review of undelivered employment allocations is required taking into account updated employment land requirements.
EMP2 Employment Area Protection	Revise to reflect any change in the status of sites within the employment hierarchy.
ED1 Education Provision	Revise – education allocation has been delivered, another is coming forward as anticipated and any new education provision needs to be added.
CF1 Community Centre	Remove – planning permission has been granted and one of the two community centre buildings is now in operation.
TM1 Tourism and Leisure	Revise – tourism related activities have been delivered on certain sites and a

	review of undelivered allocations is required.
L1 Formal Leisure Facilities	Retain or Remove – this undelivered allocation needs to be reviewed to determine whether it remains deliverable over an extended plan period.
ENV1 Green Wedges	Functioning effectively.
ENV2 Special Landscape Areas	Functioning effectively. An overall review is however required to reflect updated Landmap information and a need for greater cross boundary consistency with neighbouring authorities.
ENV3 Sites of Importance for Nature Conservation	Revise – new SINCS to be added and SINC boundary changes required as a result of development.
ENV4 Land Reclamation Schemes	Retain or remove - undelivered allocations need to be reviewed to determine whether they remain deliverable over an extended plan period.
ENV5 Cemeteries	Revise – certain cemetery extensions have been delivered, undelivered extensions need to be reviewed and any new cemetery provision needs to be added.
M1 Safeguarding of Minerals	Functioning effectively.
M2 Minerals Buffer Zone	Revise to reflect up-to-date planning permissions and the ceasing of mineral operations.
M3 Areas where Coal Working will not be Acceptable	Revise to reflect a consistent regional approach.
M4 Preferred Areas	Remains broadly appropriate but should be reviewed in the context of recent planning decisions and developer proposals for quarry extensions.
W1 Land for Waste Management	Revise – waste facilities have been delivered on certain sites and new requirements need to be added.

5.0 WHAT REVIEW PROCESS IS RECOMMENDED?

- 5.1 Based on findings of preceding annual monitoring reports together with the review of the evidence base and contextual changes, it is considered appropriate to revise the LDP following the full revision process. The majority of stakeholders have also agreed that this is the most appropriate approach to LDP revision.

- 5.2 Important factors in reaching this conclusion include the inability to deliver the levels of growth required by the LDP's Strategy of 'Growth and Regeneration' and the resulting failure to maintain a 5 year land supply. The level of growth therefore needs to be reconsidered which could result in a significant change to the LDP's Strategy. In addition, the extent of changes required to the evidence base in order to extend the plan period could result in a plan significantly different from the adopted LDP.

6.0 IS THE EVIDENCE BASE UP-TO-DATE?

6.1 Introduction

6.1.1 Since the preparation and adoption of the LDP, there have been a number of changes to the evidence base which indicate that the LDP will need to be revised in order for it to remain appropriate for the area. It is also recognised that other elements of the evidence base will need to be updated as part of preparing a revised LDP. The most significant updates to the evidence base are highlighted below.

6.2 Topic Based Studies

6.2.1 The plan period will need to be extended to ensure that the revised LDP has operational life of at least 10 years after adoption. In light of the time it will take to prepare a revised LDP (either 12-18 months or within 4 years depending on the form of revision) it is considered that the revised LDP is likely to extend beyond 2030. Updates to topic based studies will therefore be required, including updated needs assessments (such as housing, employment, and retail) and additional land requirements.

6.3 Sustainability Appraisal

6.3.1 A Sustainability Appraisal (SA) is a mandatory requirement in the preparation of LDPs, covering the social, economic and environmental effects of the LDP. A Strategic Environmental Assessment (SEA) is also a statutory requirement with the aim of improving the environmental performance of the plan and providing strategic environmental protection. SA, incorporating SEA, was fully integrated into the preparation of the adopted LDP.

6.3.2 SA monitoring is undertaken on an annual basis to check whether the LDP is contributing to the achievement of sustainable development and to identify any unforeseen adverse effects. Since the adoption of the LDP, opportunities have been taken to improve the SA monitoring process and certain indicators and data sources have been amended and updated, where appropriate.

6.3.3 By keeping such matters under review it has been possible to identify trends and incrementally update the baseline data that informed the preparation of the LDP. A further reconsideration of the baseline data, along with a review of other plans, policies and programmes, will however be required as part of preparing a revised LDP following the full revision process. The SA framework will also need to be reviewed to ensure that it remains appropriate for the assessment of a revised LDP.

6.4 Habitats Regulations Assessment

- 6.4.1 Part 6 Chapter 8 of the Conservation of Habitats and Species Regulations 2010 requires the screening and appropriate assessment of a plan in order to ascertain whether it is likely to have a significant effect on the integrity of European protected sites, such as a Special Area of Conservation, a Special Protection Area and a Ramsar site. A screening assessment and appropriate assessment was undertaken during the preparation of the adopted LDP, and will require reconsideration as part of the full revision process.

7.0 ARE THERE OPPORTUNITIES TO WORK WITH OTHER LPAs?

- 7.1 Welsh Government's commitment to reforming Local Government has been reinforced by the recent statement given by Mark Drakeford (Assembly Minister for Local Government). He intends to proceed with proposals which would see regional working becoming, over time, the norm in many areas of local government activity. This is to build on the City Deal work and will require economic development, strategic transport and strategic land use planning to be on this footprint. This will operate under the discretion of a Joint Governance Committee for the area, comprising elected members of the constituent local authorities. A Local Government Bill is to be introduced into the Assembly during 2018 to give effect to these reform proposals and mandate that a Strategic Development Plan (SDP) is prepared.
- 7.2 The Cardiff Capital Region is committed to regional working across the ten South East Wales Authorities and as part of the City Deal offer gave a commitment to prepare an SDP for the region. Notwithstanding this, there has been a reluctance to commence work on an SDP and as a result 7 of the 10 local planning authorities need to commence work on reviewing their LDPs or risk not having a Plan in place at the end of 2021.
- 7.3 Whilst there is general support for the preparation of an SDP, even if a decision is taken now to commence its preparation it would be 2023 before it is adopted. It would then take another 18 months to 2 years to adopt an LDP 'lite' to guide development at the local level. This means that it will be 2025 before a Plan is in place to guide development and protect the environment at a local level. As a result, Blaenau Gwent will not have a Plan in place for 4 years from the end of 2021 to 2025.
- 7.4 To address the issue work would need to commence on preparing a revised Plan immediately. Blaenau Gwent is therefore in discussion with Torfaen, Monmouthshire and Caerphilly regarding possible joint working arrangements. These arrangements vary from working collaboratively to prepare individual replacement Plans through joint working on the preparation of key areas of the evidence base and the sharing of expertise, to full collaboration and preparation of a Joint Local Development Plan.
- 7.5 At present no decision has been made on a way forward, however it is anticipated that a decision will be made during the autumn of 2017.

APPENDIX A – List of Internal and External Stakeholders Consulted

Name	Organisation/Section
John Payne	Local Agent
Michael Harris	Local Agent
Adrian Reed	Local Agent
Peter Barnes	Peter Barnes & Associates
Chris Meredith	Local Agent
Graham Worthington	Worthington Enterprises
Adrian Drew	Local Agent
Terry Morgan	Local Agent
Liz Heron	Heron Associates
Stefan Morgan	Morgan & Horowskyj
Mr Garner	EOS Architects
KJ Lloyd	KJ Lloyd Architect
Roger Field	FTAA Ltd
-	BB Design Services
Philip Tucker	Local Agent
Gwyn Humphreys	Local Agent
Owen Davies	Owen Davies Consulting Ltd
Mr Dallimore	C2J Architects and Town Planners
-	Atkins
-	Boyer Planning
-	Savills
-	Litchfields
-	Peacock & Smith
-	RPS Group
-	Tony Thorpe Associates
-	WYG
-	Land Access & Recreation Association
-	BNP Paribas Real Estate
-	DLP Planning
Martin Dolan	Capita Property
Louis Chicot	Louis Chicot Associates
Alys Thomas	Cushman and Wakefield
Michael Rees	LRM Planning Ltd
Richard Gwinnell	Abertillery & Llanhilleth Community Council
Mrs A Davies	Brynmawr Town Council
Mrs T Hughes	Nantyglo & Blaina Town Council
-	Tredegar Town Council
-	Blaenavon Town Council
Rhys Evans	Dwr Cymru Welsh Water
Gemma Beynon	Natural Resources Wales
-	Cadw
Alun Davies	AM

Nick Smith	MP
Mark Harris	Home Builders Federation Wales
Catlin Ritchie	Abertillery Retailer Action Group
-	Ebbw Vale Business Forum
Mrs D Wallbank	Blaenau Gwent Business Forum/ Chairman of Brynmawr Business Forum
-	Tredegar Business Forum
Gerrard Williams	Melin Homes
Richard Hallet	Linc Cymru
Richard Mann	United Welsh
Andrew Cooke	Tai Calon Community Housing
Vic Warren	Campaign for the Protection of Rural Wales (Newport and Valleys)
Jessica Tippins	Gwent Police
Verronika Brannovic	Gwent Wildlife Trust
-	Glamorgan Gwent Archaeological Trust
-	South Wales Fire Service
Diane Kirkland	Local Health Board
Huw Lewis	GAVO
Steve Smith	Blaenau Gwent County Borough Council
Eirlys Hallet	Blaenau Gwent County Borough Council
Alun Evans	Blaenau Gwent County Borough Council
Carl Powell	Blaenau Gwent County Borough Council
Jim Allen	Blaenau Gwent County Borough Council
Francis Williams	Blaenau Gwent County Borough Council
Bethan McPherson	Blaenau Gwent County Borough Council
Nicola Somerville	Blaenau Gwent County Borough Council
Leanne Connor	Blaenau Gwent County Borough Council
Andrew Parker	Blaenau Gwent County Borough Council
Helena Hunt	Blaenau Gwent County Borough Council
Chris Engel	Blaenau Gwent County Borough Council
Bernadette Elias	Blaenau Gwent County Borough Council
Dave Watkins	Blaenau Gwent County Borough Council
Clare Gardner	Blaenau Gwent County Borough Council
Lisa Jones	Blaenau Gwent County Borough Council
Mark Congreave	Blaenau Gwent County Borough Council
Frank Olding	Blaenau Gwent County Borough Council
Michelle Church	Blaenau Gwent County Borough Council
Louise Horner	Blaenau Gwent County Borough Council
Andrew Long	Blaenau Gwent County Borough Council
Andrew Fleming	Blaenau Gwent County Borough Council
Wayne Jervis	Blaenau Gwent County Borough Council
Mark Hopkins	Blaenau Gwent County Borough Council
Katie Partington	Blaenau Gwent County Borough Council

APPENDIX B – List of Background Documents

- **Annual Monitoring Report (September 2016)**
- **Topic Based Background Papers**
 - Housing
 - Affordable Housing
 - Economic Development
 - Retail
 - Environment
 - Leisure
 - Tourism
 - Renewable and Low Carbon Energy
 - Transport
 - Waste
 - Minerals
- **Discussion Paper – Review (June 2017)**
- **Consultation Report – Review (July 2017)**

