

Committee: **Regeneration Scrutiny Committee**
Date of meeting: **14th November 2019**
Report Subject: **Replacement Local Development Plan Preferred Strategy**
Portfolio Holder: **Cllr D Davies, Executive Member – Regeneration & Economic Development**
Report Submitted by: **Lynda Healy, Team Manager – Building Control and Development Plans**

Reporting Pathway								
Directorate Management Team	Corporate Leadership Team	Portfolio Holder / Chair	Audit Committee	Democratic Services Committee	Scrutiny Committee	Executive Committee	Council	Other (please state)
15/10/19	22/10/19	05/11/19			14/11/19		12/12/19	

1. Purpose of the Report

- 1.1 The Council will require a new Local Development Plan (LDP) from 2021. Preparatory work has begun. This report seeks approval of the Preferred Strategy (Appendix 1) to be taken forward for consultation. This is a key document in the process and sets the strategic framework for the new replacement LDP.

2. Scope and Background

Background

- 2.1 In October 2018 the Council agreed to prepare a Replacement Local Development Plan (RLDP) on the basis that the current Local Development Plan (LDP) was failing to deliver and would cease to exist at the end of 2021.
- 2.2 The Delivery Agreement, between the Council and Welsh Government, sets out the process and timetable for the preparation of the RLDP (agreed in October 2018). The Preferred Strategy represents the culmination of a period of pre-deposit plan preparation and engagement (Stage 1).
- 2.3 This stage has involved extensive engagement with stakeholders to build consensus on the preferred strategy. Two sets of workshops were held; the first sought to identify the challenges the Borough faced and agree a Vision of where the Borough should be by the end of the Plan period (2033). The second workshop looked to agree the level of growth, the spatial distribution of that growth and the settlement hierarchy to locate the growth.
- 2.4 Invitations to the workshops were sent to everyone on our consultation database (166), members and internal officers. Over 80 people attended with representatives from all target groups. Targeted workshops were also held with the Children's Grand Council, the Youth Forum and representatives of the business community.

- 2.5 A report of consultation identifies how stakeholders have influenced the selection of the Preferred Strategy. Two reports have been prepared one on the Issues and Vision and another on the Spatial Strategy Options both are available [on line](#).
- 2.6 Informal consultation with Welsh Government on the draft Preferred Strategy identified concerns with the level of growth and the level of flexibility that was being proposed. They considered the growth level too ambitious and undeliverable based on past build rates. This has resulted in the setting of a slightly lower housing requirement figure (117 rather than 141) than that which was generally supported by stakeholders. Similarly the flexibility was reduced from 27% to 21%.
- 2.7 Welsh Government also raised a fundamental concern with the preferred spatial strategy, which sought to disperse growth across the Borough with all main settlements all classed as Tier 1. This was considered to be contrary to Planning Policy Wales (Edition 10) and the principle of delivering sustainable development. To address this concern the settlement hierarchy was increased from 3 tiers to 5 and the spatial distribution of growth is being focussed on the most sustainable settlements Tiers 1 and 2. Whilst the growth is spread across the Borough it is not equally spread as was generally supported by stakeholders.
- 2.8 Whilst the proposed strategy is a compromise in terms of what stakeholders generally supported it is a more deliverable and sustainable strategy and maximises existing opportunities.

Scope

- 2.9 The Preferred Strategy is the first formal consultation in the RLDP preparation process and sets out how the County Borough is to evolve over the period to 2033. It provides the strategic framework for more detailed policies, proposals and land use allocations which will be included in the Deposit RLDP.
- 2.10 The Preferred Strategy sets out the Council's vision, outcomes, objectives and Spatial Strategy to guide the level and distribution of future growth and development. It is supported by a number of Strategic Policies which set out how the strategy outcomes are to be delivered.
- 2.11 The Preferred Strategy has been guided by a framework of key inputs that comprises:
- National legislation and policy;
 - Local and regional policies and strategies;
 - An evidence base relating to key issues for the Plan to address.

2.12 Content

The Preferred Strategy (See Appendix 1) document includes:

- An **introduction** explaining what the Preferred Strategy is (section 1)
- A summary of the **Context** of Blaenau Gwent and its regional and legislative context (section 2)
- A summary of the **Challenges** the area faces and the **Drivers** for change (section 3)
- The **Strategic Framework** in the form of a **vision** for the future development of the Borough with clear **outcomes and objectives** for the preferred

strategy to meet. This section also provides an overview of the growth and spatial strategy options that have been considered in determining the preferred strategy. It goes on to provide detail of the preferred strategy in terms of **growth and spatial distribution** (section 4)

- Strategic policies to **implement and deliver** the **Strategy** (section 5)
- The **Next Steps** for Candidate Sites and future stages (section 6)

- 2.13 The Preferred Strategy is for **Sustainable Economic Growth** with an aim to improve prosperity and close the employment gap with the rest of Wales (See Appendix 1: Strategic Policy 1 pp 25-26). This involves helping 3,375 people into work through increasing economic activity, reducing unemployment, reducing out-migration and out-commuting. This will be achieved by enabling good quality, secure and sustainable jobs. All this can be delivered through maximising opportunities from the City Deal, Valleys Task Force, Tech Valleys, Enterprise Zone and Metro proposals. To enable this, the Preferred Strategy identifies the need for 46 ha of employment land to be allocated in the deposit plan. It should be noted that this will not require any additional land allocations to those already identified in the current Plan.
- 2.14 The Strategy makes **provision** for an aspirational 2.9% (1,996) increase in population and a 6.5% increase in households (2,020) (based on a popgroup Short Term 2012-2017 scenario which is similar to the WG 'Principal' projection but includes the last 3 years statistics (See Appendix 1: pp 69-70)). This will be achieved by delivering **141** homes per annum totalling **2,115** over the Plan period. This is ambitious but achievable. A less ambitious **housing requirement** figure is set (based on a dwelling led scenario of 120 per annum) which the Plan **must** meet and this requires **117** homes to be built per annum totalling **1,755** over the Plan period (See Appendix 1 pp 76).
- 2.15 This growth is to be distributed across the Borough based on a new settlement hierarchy that has been derived from a sustainability assessment of settlements (See Appendix 1: pp 29). Nearly half the homes (45%) are to be delivered in the Primary Settlement, 50% in the Main Settlements and 5% in Secondary Settlements, Villages and Hamlets. Within the main settlements the homes are proportionally allocated based on the population size and capacity to deliver. The detail of this is set out in Strategic Policy 1 in section 4 of the Preferred Strategy (See Appendix 1: pp 26-27) and is summarised in the table below:

Settlement Tier	Name	Number (Share %)
Tier 1: Primary	Ebbw Vale	952 (45%)
Tier 2: Main	Tredegar	423 (20%)
Tier 2: Main	Brynmawr / Nantyglo / Blaina	423 (20%)
Tier 2: Main	Abertillery (including Cwmtillery and Six Bells)	211 (10%)
Tier 3: Secondary	Cwm	106 (5%)
Tier 4: Village	Aberbeeg / Brynithel / Llanhilleth	
Tier 5: Hamlets	Swfrydd	
	Trefil, Pochin and Bedwellty Pits	

- 2.16 To provide as much information as possible to the public at this stage, strategic mixed use sites are identified (See Appendix 1: pp 29-30). These are:
- The Works, Business Hub, Ebbw Vale (3.5ha employment land) and 250 homes
 - Ebbw Vale Northern Corridor - Rhyd y Blew (13.2 ha employment land) and Bryn Serth (10 ha employment land) and 805 homes
 - Nantyglo Comprehensive Site (220 homes) and other uses
- 2.17 Only a limited number of new housing allocations are required when completions to date (18/19); sites with planning permission; small and large windfalls; and strategic mixed use sites are taken into account. Additional allocations are only required in Tredegar (217 homes) and Abertillery (including Cwmtillery and Six Bells) (149 homes) (See Appendix 1: Strategic Policy 8 pp 44).
- 2.18 To ensure future developments are delivered in a sustainable manner and meet with Welsh Government requirements (Sustainable Key Planning Principles and National Sustainable Placemaking Outcomes) four sustainable outcomes are identified. These outcomes are then delivered by a set of Strategic Policies as follows:
- Outcome 1: Create a Network of Sustainable Vibrant Valley Communities (Placemaking)**
Strategic Policy 2: Sustainable Placemaking and Design
Strategic Policy 3: Climate Change
- Outcome 2: Create Opportunities for a Prosperous Low Carbon Economy and Promote Learning and Skills**
Strategic Policy 4: Employment and Growth
Strategic Policy 5: Growing Tourism
Strategic Policy 6: Sustainable Minerals Management
Strategic Policy 7: Sustainable Waste Management
- Outcome 3: Create Well-Connected, Active and Healthy Communities**
Strategic Policy 8: Delivery of Homes
Strategic Policy 9: Gypsy and Travellers
Strategic Policy 10: Retail Centres and Development
Strategic Policy 11: Sustainable Transport and Accessibility
Strategic Policy 12: Social and Community Infrastructure
- Outcome 4: Protect and Enhance the Distinctive Natural and Built Environment**
Strategic Policy 13: Protection and Enhancement of the Natural Environment
Strategic Policy 14: Preservation of the Built Environment
Strategic Policy 15: Environmental Protection
- 2.19 Another area of focus for stakeholders has been our town centres in terms of their hierarchy and future roles. As it has been difficult to build consensus on a way forward Strategic Policy 10: Retail Centres and Developments proposes that the existing retail hierarchy is reviewed based on the results of a new Retail Study (See Appendix 1: pp 46-48). As soon as the growth level is agreed a retail study will be commissioned which will undertake an assessment of key market trends; shopping patterns; and quantitative and qualitative retail need. Decisions on the retail hierarchy are technical matters based on evidence of the ranking, catchment areas and mix of uses along with an assessment of the likely future status of town centre

based on growth plans and availability of sites.

- 2.20 In order to ensure that the Preferred Strategy is sustainable it will be subject to an Integrated Sustainable Assessment including Strategic Environmental Assessment (SEA), Health Impact Assessment (HIA), Equality Impact Assessment (EqIA) and Welsh Language Impact Assessment (WLIA). A Habitat Regulation Preliminary Screening is also being undertaken. Both may result in changes to the Preferred Strategy but due to the tight timescales involved these **changes will be reported verbally to Scrutiny Committee.**

Next Steps

- 2.21 Subject to consideration of Scrutiny and approval by Council, the intention is to undertake a 6-week public consultation exercise on the Preferred Strategy and Initial Integrated Sustainability Report in January / February 2019. The consultation will be carried out in accordance with the procedures set out in the Delivery Agreement (October 2018) and will include:
- Email / letter to consultation database
 - Press Releases
 - Use of Social Media
 - Availability on Website
 - Drop in Exhibitions across the main towns
 - Making available deposit documents at Council offices and all public libraries
- 2.22 The intention is to work closely with the Communications Team to prepare a communications strategy which will include the preparation of an easy read Preferred Strategy and an animation to engage the public in the process.
- 2.23 Following the consultation exercise, responses will be reported back to Council. A consultation report will be prepared and published containing details of all the representations and the Council's responses. Where considered appropriate the responses will inform the preparation of the Deposit Plan.
- 2.24 A further call for Candidate sites and supporting information (viability and deliverability) for existing Candidate Sites that meet the Preferred Strategy will be sought in January 2020 (See Appendix 1 pp 59).
- 2.25 The Deposit Plan will then be prepared and considered by Council prior to public consultation in October 2020.

3. Options for Recommendation

- 3.1 Option 1: To support the Preferred Strategy for public consultation; and refer it on for approval by Council.

Option 2: Support amendments to the Preferred Strategy to be referred on for approval by Council.

Option 3: Do not support the Preferred Strategy.

4. **Evidence of how does this topic supports the achievement of the Corporate Plan / Statutory Responsibilities / Blaenau Gwent Well-being Plan**

Corporate Plan

- 4.1 The Preferred Strategy will enable the delivery of Economic Development & Regeneration, Strong & Environmentally Smart Communities and Education (improvements in school buildings).

Statutory Responsibilities

- 4.2 There is a statutory responsibility to prepare a Local Development Plan for the Borough and to keep that Plan up to date.

Blaenau Gwent Well-being Plan

- 4.3 The strategic policies in section 5 of the Preferred Strategy are cross referenced to the Well-being Plan objectives and address all 5 objectives.

5. **Implications Against Each Option**

Option 1: To support the Preferred Strategy for public consultation; and refer it on for approval by Council

Will enable the Preferred Strategy to be consulted on within 3 months flexibility of the timetable set out in the Delivery Agreement.

Option 2: Support amendments to the Preferred Strategy to be referred on for approval by Council

If changes do not require significant amendments and the Initial ISA can be updated then the Preferred Strategy can proceed within 3 months flexibility of the timetable set out in the Delivery Agreement. If the changes are significant it would lead to a delay which would lead to the need to renegotiate the Delivery Agreement with Welsh Government.

Option 3: Do not support the Preferred Strategy

This would lead to a delay due to the need for further engagement, a rewrite and an update to the Initial ISA and would take us over the 3 months flexibility. This would require a change to the Delivery Agreement which would need approval from the Council and Welsh Government.

5.1 ***Impact on Budget (short and long term impact)***

Further studies will be required on Retail, Special Landscape Areas, Renewable Energy Assessment, Viability of Affordable Housing provision, Viability work on sites, and an Update of the Ebbw Vale North Sustainable Framework. Also a student placement has been appointed to assist in the preparation of the Plan. These costs can be covered by the LDP Reserve (£192,166). In the longer term there will be a budget pressure in 2021/22 (**£132,388**) due to Examination costs.

5.2 ***Risk including Mitigating Actions***

- There is a risk that the Plan is not in conformity with the draft National Development Framework (NDF)

Work has been undertaken to align the strategy and policies with the draft NDF and comments have been made on some aspects of the NDF.

- There is a risk that Welsh Government raises issues with the Preferred Strategy. We have addressed the Welsh Government Officers concerns and they are confident that any other issues could be addressed by the Deposit Plan.
- There is a risk that Welsh Government raises issues with the lack of regional agreement on the growth figure.
We have worked with neighbouring LPAs to agree growth figures but in the absence of a SDP it is not possible to achieve agreement on a regional level. This is due to the fact that only 4 of the 10 LPAs are proceeding at present.
- There is a reputational risk to the Council if we do not meet set timescales.
A Member workshop has been held prior to scrutiny in order to identify and where possible address concerns.

5.3 ***Legal***

Regulations 15 and 16 of the Planning (Wales) Act 2015 requires public consultation over a statutory 6 week period on the Preferred Strategy and options; and to consider if changes are needed to the Preferred Option and Strategy for the replacement LDP.

5.4 ***Human Resources***

There are no HR resource issues.

6. **Supporting Evidence**

6.1 ***Performance Information and Data***

The Delivery Agreement sets out the timetable which we must adhere to. A slip of more than 3 months requires us to gain agreement from Council and Welsh Government.

6.2 ***Expected outcome for the public***

A clear indication of where development will take place and what is required from new developments.

6.3 ***Involvement (consultation, engagement, participation)***

Preparation of the RLDP provides a number of opportunities to engage with our stakeholders, residents and customers, including the business community. To ensure this we listened to a wide range of views to inform the plan and decision making process. The Pre-Deposit Engagement Stage has been all about engaging with our stakeholders including the business community to identify our challenges, vision and preferred strategy. The next stage is about consulting residents and customers.

6.4 ***Thinking for the Long term (forward planning)***

The RLDP is about planning for the future to ensure Blaenau Gwent is sustainable and that we address the future needs and demand for development in the area.

6.5 ***Preventative focus***

The RLDP provides an opportunity to understand the root causes of issues and prevent them by being proactive in our thinking and understanding the need to tackle problems at source.

6.6 ***Collaboration / partnership working***

We have worked in partnership with Monmouthshire and Torfaen in commissioning a number of studies and pieces of work to support the RLDP. We have also held regular meetings to ensure a consistency of approach. In addition all neighbouring LPAs and partners were invited to take part in a series of workshops.

6.7 ***Integration(across service areas)***

Key staff, from across the authority were invited to attend workshops and a number of these have been consulted on the draft preferred strategy.

6.8 ***EqlA(screening and identifying if full impact assessment is needed)***

A full impact assessment is currently being undertaken.

7. **Monitoring Arrangements**

- 7.1 There will be Annual Monitoring Reports to Scrutiny (information item) and Executive.

Background Documents /Electronic Links

- Appendix 1: Preferred Strategy
- Initial Integrated Sustainability Appraisal
- Habitat Regulation Preliminary Screening Report
- A full list of background documents is set out in Appendix 2 of the Preferred Strategy