



Caerphilly County Borough
2nd Replacement Local Development Plan 2020-2035

EB43: Initial Consultation Report (ICR)

May 2025

Caerphilly County Borough

2nd Replacement Local Development Plan

2020 - 2035

EB43

Initial Consultation Report

Pre-Deposit Plan (Revised Preferred Strategy)

May 2025

Introduction

This document represents the Initial Consultation Report that the Council is required to prepare for the purposes of Regulation 16 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 as amended by The Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015.

In accordance with the LDP Regulations, the Report identifies:

The steps taken to publicise plan preparation, and how this complies with the Community Involvement Scheme contained in the Delivery Agreement;

Bodies involved, notified or consulted at the Pre-Deposit public consultation stage;

The main issues raised, and how they have influenced the next stage of plan preparation;

A general summary of comments and the LPA's response;

A schedule of individual site related comments and new candidate site submissions.

Compliance with the Delivery Agreement

The Revised Preferred Strategy public consultation took place between 15th January and 26th February 2025. It should be noted that, as a result of a system issue with the consultation portal, representations that were received on 27th February 2025 were accepted as duly made representations.

The Approved Delivery Agreement (DA) details the stages involved in the plan-making process, the time each part of the process is likely to take, and it outlines the Council's approach to community engagement and involvement in the preparation of the 2RLDP. It is split into two key parts:

- The Timetable
- The Community Involvement Scheme

The Timetable

The timetable provides an indication of when various stages of plan preparation will take place. Definitive dates are provided up to the Deposit stage and indicative dates for later stages. The timetable allows for a marginal degree of flexibility, however, any amendments to the DA will require approval by the Council prior to Welsh Government agreement.

Community Involvement Scheme (CIS)

The CIS sets out the Council's principles, strategy and mechanisms for community and stakeholder engagement throughout the revision process. The Council will need to comply with the requirements for community engagement that are set out in the CIS and any deviation should be exceptional and fully justified. The consultation processes contained within the CIS have been followed.

Consultation Bodies

Each individual and organisation listed on the LDP Consultation Database, including anyone who provided their contact details in order to be informed of the 2RLDP, were notified by email or letter, based on their chosen preference, to inform them of the Pre-Deposit Public Consultation. In total, 1,708 representors were contacted and provided with background information, details on how to access the consultation documents as well as how to make comments and where to find information on the public engagement sessions.

The list is continually changing, but an indication of the range of bodies that were consulted is indicated by the lists of consultation bodies as detailed in Appendix 1 of the Delivery Agreement.

Consultation Methods

In an attempt to engage as wide an audience as possible in the Preferred Strategy public consultation, the Council used a variety of means of communication reflecting the CIS. The consultation methods used included:

- Emails / letters to all on the LDP Consultation Database;

- Posters advertising the public consultation and consultation events were displayed in all libraries and within selected shops.
- Consultation Portal displaying all consultation material, allowing direct, online comments to be made.
- Caerphilly County Borough Council website & Social Media Promotion:
 - CCBC LDP web pages - 3069 hits, CCBC LDP press release - 2538 hits.
 - Facebook post, 29th January 2025 – 13,495 views, Facebook post, 15th January 2025 – 23,310 hits)
- Gov Delivery email bulletin (January 2025 - 34,409 subscribers, February 2025 – 33,542 subscribers).
- A series of 6 engagement sessions, led by Planning Aid Wales, were held both online and at venues in Caerphilly, Risca/Pontymister and Bargoed;
- A static exhibition, based at Tredomen Business & Technology Centre, was staffed by officers every Tuesday to Thursday throughout the consultation;
- Officers were available at Blackwood Library on the morning of Wednesday 19 February;
- Officers were available via the LDP Hotline and on an appointment basis throughout the consultation period.

Public Engagement

The Council appointed Planning Aid Wales to prepare and deliver a series of community and stakeholder engagement events and a mixture of online and face to face events were carried out.

Six events were held, and stakeholders were invited to attend any of these six events. The date and format of the events is listed below:

- Wednesday 22nd January 2025: 10am –12pm Online
- Wednesday 29th January 2025: 6 –8pm Risca Primary School, Dan-y-Graig Road, Risca, NP11 6DB
- Monday 3rd February 2025: 6 -8pm Cwrt Rawlin School, Cae Croes Heol, Caerphilly CF83 1SN
- Wednesday 5th February 2025: 6 -8pm Bargoed YMCA, 12, Aeron Place, Bargoed,
- Thursday 13th February 2025: 2 -4pm Twyn Community Centre, Twyn Square, Caerphilly CF83 1JL
- Wednesday 19th February 2025: 6 –8pm Online

A total of 131 number of people attended the events. A report of the Planning Aid events is included as Annex 5.

In addition, officers were available at Tredomen Business and Technology Centre, Tuesday to Thursday, throughout the public consultation. A total of 28 people attended for pre-booked appointments or on a drop-in basis.

Officers were also available at Blackwood Library on the morning of Wednesday 19 February, one person attended.

Availability of Documents

The key consultation documents, including an Easy Read Summary, were available via the Council's website and hard copies were displayed in all libraries and at Ty Penallta and Tredomen Business and Technology Centre. Paper copies were provided in exceptional circumstances.

Representations could be made online via the consultation portal, via email or letter and paper versions of representation forms were also available.

The Revised Preferred Strategy Public Consultation

The Revised Preferred Strategy was published in January 2025, representing the completion of a period of Pre-Deposit plan preparation and engagement, which influenced its development. The following documents were available for public consultation:

- The 2nd Replacement Caerphilly County Borough Local Development Plan 2020 - 2035 Pre-Deposit Plan (Revised Preferred Strategy)
- The Initial Integrated Sustainability Appraisal (ISA) Report and ISA Scoping Report, Habitat Regulations Assessment: Initial Screening Report.

The Candidate Site Register and a Draft Candidate Site Assessment Summary were also published, and comments were invited on the submitted candidate sites.

- EB8 Candidate Site Methodology
- EB9, EB9.1 – EB9.5, Candidate Site Register
- EB10 Candidate Site Summary

Other supporting Evidence Base Documents.

- EB1 Strategy Options Assessment
- EB2 Pre-Deposit Engagement
- EB2.1 Pre-Deposit Engagement (Addendum)
- EB3 Settlement Role, Function and Sustainability Analysis
- EB3A Settlement Role, Function and Sustainability Analysis Supporting Tables
- EB4 Population and Housing Growth Options
- EB4.1 Population and Housing Growth Options (Addendum)
- EB5 Housing Land Supply and Affordable Housing Target
- EB5.1 Housing Land Supply and Affordable Housing Target (Addendum)

- EB6 Local Housing Market Assessment
- EB7 Gypsy and Traveller Accommodation Assessment
- EB11 Transport Background Evidence Paper
- EB12 Strategic Flood Consequences Assessment
- EB13 Regional Low Carbon Energy Assessment
- EB14 Employment Background Evidence Paper
- EB15 Larger than Local Employment Study
- EB16 Employment Land Review
- EB17 Retail Capacity Study
- EB20 Green Infrastructure Assessment
- EB21 Regional Assessment of Future Growth and Migration for the Cardiff Capital Region

Responses to the Public Consultation

A total of 1,003 individuals made representations on the Revised Preferred Strategy and its supporting documents. Many of the representors made more than one representation to the consultation by commenting on different policies and sites and/or more than one candidate site.

In total, 1,986 representations were received as part of the Public Consultation.

A total of 7 representations were not duly made as they were received after 27th February 2025. These will not be considered further.

The number of representations were as follows:

- Preferred Strategy – 346 representations, comprising 77 representations of support, 109 objections and 160 comments.
- Candidate Sites Register – 1,606 representations, comprising 44 representations of support, 1,391 objections and 171 comments.
- Integrated Sustainability Appraisal – 6 representations, comprising 1 representation of support, 3 objections and 2 comments.
- Other Supporting documents – 21 representations, comprising 2 representations of support, 12 objections and 7 comments.

Key Issues Raised

Welsh Government

Comments were made on the Revised Preferred Strategy by statutory consultees, including the Welsh Government. Welsh Government's comments are split into two separate parts, firstly comments in respect of General Conformity and secondly in respect of Core Matters that need to be addressed at Deposit Stage.

In respect of general conformity Welsh Government commented:

“The Welsh Government is of the opinion that the Caerphilly County Borough Council Replacement Local Development Plan (2020-2035) Revised Preferred Strategy is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3)”.

In addition to this Welsh Government also commented:

“On balance, (and subject to the comments in Annex 2), the Welsh Government considers that the Revised Preferred Strategy, including the scale and distribution of growth, is in general conformity with key policies in Future Wales namely (not exhaustive):

- Policy 1: Where will Wales grow
- Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
- Policy 6: Town Centre First
- Policy 18: Renewable and Low Carbon Energy Developments of National Significance
- Policy 33: National Growth Area – Cardiff, Newport and the Valleys
- Policy 36: South-East Metro”.

In respect of the Core Matters, Welsh Government raised comments in respect of the following areas:

- Housing and Economic Growth Levels – Regional Collaboration
- Settlement Hierarchy - Spatial Distribution and Clarity of Components of Housing Supply
- Viability Assessments
- Up-to-Date LHMA – Overall Need
- Deliverability of Sites & Infrastructure Requirements
- Best and Most Versatile Agricultural Land (BMV)

In summary, Welsh Government has confirmed that the Revised Preferred Strategy is in General Conformity with Future Wales and the comments in respect of the Core Matters relate to work that will be undertaken as the plan is progressed to Deposit Stage. Given this there is nothing in the Welsh Government comments that would preclude the Council from progressing the plan to Deposit stage.

Annexes 1a and 1b set out the Revised Preferred Strategy representations, an officer response to the representation and a recommendation for appropriate action.

Other Key Issues

The principal areas of representation in respect of the Revised Preferred Strategy and the supporting Evidence Base are:

- The Key Objectives (20 representations)
- Policy PS1: The Level of Growth for the 2RLDP (20 representations)
- Policy PS2: The Revised Preferred Strategy for the 2RLDP (22 representations)
- The Sustainable Settlement Hierarchy (18 representations)
- The Revised Preferred Strategy (18 representations)
- Policy PS11: Managing Housing Growth (17 representations)

Annexes 2a and 2b set out the Revised Preferred Strategy representations, an officer response to the representation and a recommendation for appropriate action.

Comments Relating to Candidate Sites

A total of 1,606 duly made representations were made in respect of Candidate Sites.

The publication of the Candidate Sites Register unsurprisingly generated a large number of responses in relation to individual sites; chief among these were:

- CB004 Land at Energlyn – 1 support, 62 objections, 1 comment.
- CB023 Land south of Rudry Road – 1 support, 327 objections, 1 comment.
- CB025 Nantycalch Farm (Option A) – 3 support, 167 objections, 1 comment.
- YM010 Land at Rhos Farm – 1 support, 231 objections, 1 comment.

Annex 3 contains a summary of the number of representations made on Candidate Sites, either in support, objection or comments made. The Candidate Sites Register and Draft Candidate Site Assessment Summary were published as part of the consultation for information, they were not formal consultation documents and whilst the representations submitted in respect of them have been accepted, they have not been addressed in this document.

For representations that raise particular matters of concern relating to Candidate Sites, due consideration will be given to the issues raised as part of the assessment process moving forward to Deposit stage.

3rd Call for Candidate Sites

A total of 63 sites were submitted as part of the 3rd Call for Candidate Sites, these are listed in Annex 4.

Annexes

Annex 1a – Welsh Government Revised Preferred Strategy representations

Annex 1b - Welsh Government Evidence Base representations

Annex 2a – Sets out the issues raised through the Revised Preferred Strategy representations and provides an officer response to them along with a recommendation on what action is needed, if any, in respect of them.

Annex 2b – Sets out the issues raised through the Evidence Base representations and provides an officer response to them along with a recommendation on what action is needed, if any, in respect of them.

Annex 3 – A summary of the number of representations made on Candidate Sites

Annex 4 – A list of sites submitted as part of the 3rd Call for Candidate Sites

Annex 5 – Planning Aid Report

Annex 1a: Welsh Government Pre-Deposit Plan (Revised Preferred Strategy) Representations

National Context

Summary of Representations:

The Welsh Government is of the opinion that the Caerphilly County Borough Council Replacement Local Development Plan (2020-2035) Revised Preferred Strategy is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

Response:

Comment is noted.

Action:

No amendment required.

3763 Comment

Policy PS1: The Level of Growth for the 2RLDP

Summary of Representations:

Moving forward to Deposit, further work would be beneficial to understand how the Revised Preferred Strategy has been developed within the wider regional context as Future Wales brings a new perspective that all LDPs have to embrace on how each plan sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP.

Response:

The comments from Welsh Government are noted.

The Council will continue to work with the authorities in the region to build on the evidence provided evidence Base document EB21: Regional Assessment of Future Growth and Migration for the Cardiff Capital Region as it moves forward to Deposit. This work will demonstrate how the 2RLDP strategy has been developed within a wider regional context and how its spatial strategy relates to the rest of the region.

Action:

No amendment required.

3764 Comment**Summary of Representations:**

The Welsh Government does not object in principle to the scale of housing growth.

Response:

The support for the scale of the growth proposed in the 2RLDP is welcomed.

Action:

No amendment required.

3765 Comment**Summary of Representations:**

It will be essential to demonstrate how the targeted increase in population/jobs can be achieved in a way which is compatible and consistent with the LDP strategies of the other LPAs in the CCR. It would be beneficial to provide information on the number of jobs created in the County Borough since the City Deal was agreed and what proportion of additional jobs can be attributed to it.

Response:

The Council will continue to work with the authorities in the region to build on the evidence provided evidence Base document EB21: Regional Assessment of Future Growth and Migration for the Cardiff Capital Region as it moves forward to Deposit. This work will demonstrate how the 2RLDP strategy has been developed within a wider regional context and how its spatial strategy relates to the rest of the region. It

will also consider how the aspirations for jobs growth are compatible and consistent with the other strategies in the region.

Action:

No amendment required.

3766 Comment

Policy PS2: The Revised Preferred Strategy for the 2RLDP

Summary of Representations:

It is unclear as to why Option 6, not necessarily as a focus, has been ruled out as the Council states that it is in 'strong conformity with national policy and guidance', in particular relation to the town centre focus and location to main transport nodes.

Response:

Strategy option 6: Caerphilly Basin Focus would seek to focus a significant majority of development to the Caerphilly Basin, at the expense of development in the other main settlements. This would require Caerphilly to accommodate a large amount of development that would be impractical given the constraints that it has. As such Option 6 has not been identified as a key element of the hybrid strategy.

Whilst Option 6 has not been included as part of the Hybrid Strategy, it most certainly is within the scope of the strategy as it is both a Principal Settlement and a major transport node, and as Policy PS3 sets out new development and growth will be focussed towards the principal and local centres in the first instance. Therefore, whilst not a principal element of the strategy, Caerphilly is most definitely a location being considered for new development and growth.

Action:

No amendment required.

3770 Comment

Summary of Representations:

The Council has chosen a 'Hybrid Strategy' (Policy PS2) comprised of Option 4 and Option 5 as the most appropriate for the LDP. It would be beneficial for further explanation of this hybrid option means with regard to the location and scale of growth across the settlements in the plan area.

Response:

The hybrid strategy is based on settlements rather than strategy areas as has been done in previous plans. As such it is more difficult to identify specific levels of growth due to the smaller scale of the locations. This is why the plan does not contain strategy areas, as the main settlements are dispersed throughout the County Borough and the transport nodes are strung along the main transport corridors. In addition to this the assessment of potential sites is ongoing and the exact levels of development for each settlement are still unknown.

The spatial distribution of development will be finalise during the preparation of the Deposit plan and the Council will prepare an evidence base document that will set out how the spatial distribution has been determined and how this relates to the Hybrid Strategy.

Action:

No amendment required.

An evidence base document will be prepared as part of the Deposit plan preparation to outline the spatial distribution of growth and new development.

3769 Comment**6 Sustainable Settlement Hierarchy****Summary of Representations:**

Paragraph 6.2 refers to four tiers in the settlement hierarchy, this should be amended to reflect that there are 5 tiers.

Response:

Paragraph 6.2 references 4 tiers of the settlement hierarchy, but omits the fifth category, rural settlements, of the bottom of the list.

Moving forward the Deposit plan will need to include all 5 categories when referencing the settlement hierarchy.

Action:

No amendment required.

The comment be noted and the Deposit plan refers to all 5 categories when referencing the settlement hierarchy.

3771 Object

Policy PS4: Areas of Growth

Summary of Representations:

The spatial distribution of housing components should relate to the settlement tiers identified in Policy PS3 to aid clarity to the plan and to understand the growth attributed to each settlement tier.

The plan should be clear how growth has been directed to more sustainable locations as defined in the Councils settlement hierarchy.

Response:

The allocation of specific sites will be a matter for the Deposit Plan. However, it is envisaged that the contextual basis for the allocation of sites will be made clear, in terms of its relationship to the hierarchy.

Action:

No amendment required.

3772 Comment

Summary of Representations:

In addition, the plan makes an allowance for 1379 windfall units, but it is not clear where (spatially) they may come forward.

Response:

By definition, the location of windfall sites is unknown until such time as proposals are submitted. The consideration of potential sites within the context of the hierarchy will be relevant to the determination of any such proposals.

Action:

No amendment required.

3773 Comment

Summary of Representations:

The Sustainability Appraisal references Welsh Language and its importance within the wider plan which is positive. The plan/evidence could be improved by explaining how locations for development align/support the Council's Sustainable Communities for Learning 9 year Strategic Outline Programme in terms of Welsh medium projects and developments and how the LDP will support these commitments. Consideration should also be given to surplus places data within Welsh medium schools in the LPA to ensure that any current issues are not exacerbated by the LDP.

Response:

While the allocation of specific sites will be a matter for the Deposit Plan, engagement will continue to be undertaken with colleagues, including those from Education, in order to ensure that interrelated corporate priorities can be supported and, where appropriate, given effect in land-use terms.

Action:

No amendment required.

3774 Comment

Policy PS8: Green and Blue Infrastructure

Summary of Representations:

It is the view of Welsh Government that the Authority has so far demonstrated a reasonable and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered at this stage.

Response:

The Council acknowledges the comments made by Welsh Government in respect of BMV land and will continue to develop its Green Infrastructure Assessment (GIA) to protect the best and most versatile areas of agricultural land.

Action:

No amendment required.

3780 Comment

Summary of Representations:

BMV is covered under the Stage 2 assessment process of Candidate Sites (D22) by use of a RAG status. Some candidate sites have been discounted at this stage due to BMV. Two sites progressing are noted to contain BMV, and surveys have been commissioned which is welcome. The Candidate site Guidance note for site promoters reflects the need for survey if BMV is identified the predictive map. This could be further supplemented by referring to the published department Predictive Map Guidance Note.

Response:

The comments in respect of BMV land and the candidate sites process are noted.

Action:

No amendment required.

3777 Comment

Policy PS9: Managing Employment Growth

Summary of Representations:

The Council must ensure that employment sites are deliverable and explain how they are sustainably located and how they relate to proposed housing allocations.

Response:

The allocation of sites will be a matter for the Deposit Plan, but the requirements of national policy in this regard, plus the guidance set out in the Development Plans Manual, are noted.

Action:

No amendment required.

3768 Comment

Policy PS12: Affordable Housing Target

Summary of Representations:

Need to ensure strong policy on affordable/social housing inclusion in new developments to ensure we meet this target. Provision of this target is probably more important than the overall housing provision target.

We require a high number of social/affordable housing so require very robust social/affordable housing clauses to ensure that our housing targets and community needs are met.

2018 LHMA is not the the new type of LHMA required by Welsh Government. Unclear as to the scale of affordable housing need over the plan period.

Response:

The affordable housing target will be reviewed as part of the preparation of the Deposit plan. It is intended that the LHMA, prepared using the latest methodology, will be included as part of the evidence base for the Deposit plan and the overall affordable housing target will therefore be revised for the Deposit LDP to take account of this as well as additional housing sites to be identified and to reflect updated viability evidence.

The target will reflect what the planning system can achieve. However, higher levels of affordable housing can be delivered through the Council's and RSL's own housebuilding programme.

Action:

No amendment required.

Provide further policy guidance on affordable housing and Include the updated LHMA as part of the evidence base for the Deposit plan.

3767 Comment

8 Next Steps

Summary of Representations:

Further Work Required by Deposit stage

- Undertake further regional collaboration to demonstrate how the emerging LDP aligns with the broader approach in the region of other LPAs
- Publish the most recent LHMA, identify an affordable housing need target over the plan period and assess any potential implications arising from the current and most recent assessments

- Breakdown the scale and spatial distribution of housing for each settlement tier
- Clearly articulate the spatial distribution of housing and other key land uses
- Specify a housing trajectory
- Identify the outstanding number of Gypsy & Traveller pitches with spatial allocations as per Policy PS20 (the evidence suggest it could be 8 pitches, less if permissions are granted)
- Specify the minerals landbank, identify any future requirements (if necessary) including buffer zones
- Undertake viability assessments to demonstrate sites can be delivered in line with the identified infrastructure requirements
- Identify infrastructure required for development
- Consider the need for masterplans for larger sites, where appropriate
- Include policies for all types of renewable energy generation both inside and outside pre-assessed areas
- The core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' should be followed.

Response:

The comments in relation to further work are noted. These will be addressed in the process of preparing the Deposit Plan.

Action:

No amendment required.

The additional evidence suggested by Welsh Government will be considered in the preparation of the Deposit Plan.

3781 Comment

Annex 1b: Welsh Government Evidence Base Representations

Integrated Sustainability Appraisal (ISA), Interim ISA Report

Summary of representations:

The WG does have concerns with the comments under bullet point 6, on p76 of the ISA; 'The majority of land in the county borough is not suitable for agricultural uses

due to its lower quality agricultural grading...'. This statement is factually incorrect and should be amended or removed. The ALC grading reflects the capability of land for a wide variety of agricultural cropping choices, not for its suitability for agricultural use.

Response:

The comment is acknowledged. This point will be amended to reflect the nature of the ALC grading system.

Action:

Amend bullet point in question to read:

"The majority of land in the County Borough is of limited value in terms of the range and yield of crops that can be sustained, due to its lower quality agricultural grading. However, there are some small areas of higher quality land at Draethen."

3776 Object

Evidence Base, EB13 Renewable and Low Carbon Energy Assessment

Summary of representations:

It is therefore unclear how impact to peat soils and peatland habitats (in the context of Chapter 6 of PPW 12) has been considered in the Renewable and Low Carbon Energy Assessment paper (2022), specifically in respect of Local Search areas proposed for wind generation (Fig 2). It is unclear how BMV policy has been considered in respect of local search areas proposed for solar PV generation (Fig 1). The WG will expect clarification for deposit stage on the above points regarding renewable energy search areas.

Response:

The comments from Welsh Government in respect of Evidence Base Document EB13 Renewable and Low Carbon Energy Assessment are noted. The Council acknowledges these comments and will update the evidence base for the Deposit stage of the plan.

Action:

No amendment required.

Evidence base document to be updated to inform the Deposit stage.

3779 Comment

Evidence Base, EB20 Green Infrastructure Assessment

Summary of representations:

The GIA and accompanying map (GI4.3) provide detail on the amount and distribution of BMV in the LPA area. The GIA provides some information on the importance of peatland and information on location and distribution in the LPA area. However, the source of this information is not clear. The WG considers the Peatlands of Wales Evidence Score map should be used as the evidence base.

Response:

The GIA outlines Peatland areas within the county borough. Supporting map GI4.3 includes the Peatlands of Wales Evidence data. This will be updated further to support the Deposit Plan.

Action:

No amendment required.

3778 Comment

Summary of representations:

The amount of BMV agricultural land within the LPA boundary is low, and therefore the risk is small. However, the Authority has demonstrated that the BMV Policy has been considered from the outset and throughout the process of developing the Preferred Strategy.

Response:

The GIA provides an overview of BMV land based on Welsh Governments 2019 ALC classifications. The Council acknowledges the comments made by Welsh Government in respect of the consideration of the best and most versatile agricultural land within the GIA.

Action:

No amendment required.

3775 Comment

Annex 2a: Pre-Deposit Plan (Revised Preferred Strategy) Representations

1The Consultation

Summary of Representations:

Reiterate the importance of resident's voices being heard as part of this consultation. It is important that there is communication with residents to clarify the situation and discuss what investigations have/will be undertaken, before any decisions are taken.

Response:

Engagement is a key aspect of the 2RLDP preparation process and details of this are contained within the Community Involvement Scheme (CIS) section of the Delivery Agreement (DA), which the Local Planning Authority must adhere to. In respect of Candidate Site Assessments, further information will be available as part of the Deposit plan public consultation.

Action:

No amendment required.

Continue engagement in accordance with the Community Involvement Scheme (CIS) section of the DA.

3533 Comment

Summary of Representations:

Please contact me in English only.

Response:

Under the Welsh Language (Wales) Measure 2011, the Council must meet the Welsh Language Standards outlined in its Compliance Notice. Failure on the Council's part to comply with any of these Standards, can lead to complaints and formal investigations by the Welsh Language Commissioner.

Standard 4 requires that we send a Welsh language version of the correspondence at the same time as we send any English language version.

Action:

No amendment required.

2292 Comment

2National, Regional and Local Context

Summary of Representations:

The LDP currently being developed is as recognised not an SDP with the absence of South-East Wales Corporate Joint Committee. However, a regional and strategic approach must be taken, or the plan will create issues for neighbouring communities and organisations. It appears difficult to assimilate a balanced development across the region when Local Authorities appear to be pulling in different directions on planning policy. A holistic overview is required in addition to required consultation.

Response:

The Revised Preferred Strategy, by its very nature, is indicative of a strategic approach, setting out a medium-to-long term framework for development in the County Borough. The plan is being prepared within the context of national planning policy and Future Wales, and is required to have regard to the development plans of neighbouring authorities.

Action:

No amendment required.

3416 Object

Summary of Representations:

We note that this chapter sets out the policy context for the RLDP. We advise that reference is made to State of Natural Resources Report (SoNaRR), which sets out and provides evidence of the current state of natural resources in Wales.

We consider that this could provide the evidence to support certain issues, aims, objectives, and ultimately policies in the RLDP.

Response:

Whilst the strategy has been prepared with regard to the aforementioned document, the objective of the sustainable management of natural resources that SoNaRR is concerned with is derived from the Environment Act 2016, which is specifically referenced. It is not considered, therefore, that specific reference to SoNaRR is required.

SoNaRR is explicitly referenced in the ISA Scoping Report, which forms the first stage in the integrated sustainability appraisal of the 2RLDP.

Action:

No amendment required.

3789 Comment

National Context

Summary of Representations:

The Welsh Government is of the opinion that the Caerphilly County Borough Council Replacement Local Development Plan (2020-2035) Revised Preferred Strategy is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

Response:

Comment is noted.

Action:

No amendment required.

3763 Comment

Summary of Representations:

A change to the primary legislation regarding archaeology and the historic environment occurred on 4th November 2024 when the Historic Environment (Wales) Act 2023 came into force. This has consolidated the existing range of primary legislation, and the supporting cascade of Policy, Guidance, Advice and Best Practice advice will be updated as a result. We note from the Plan document that the legislation referred to includes those replaced by the Historic Environment (Wales) Act 2023. The correct legislation and supporting Policy and Advice cascade should be included in the Plan.

Response:

The National, Regional and Local Context section makes specific reference to the following pieces of legislation:

The Well-Being of Future Generations (Wales) Act 2015;

The Planning (Wales) Act 2015;

The Environment (Wales) Act 2016;

The Active Travel (Wales) Act 2013;

The Socio-Economic Duty of the Equality Act 2010.

It is not clear which of these, or parts thereof, has been replaced by the Historic Environment (Wales) Act 2023 as the respondent has suggested. However, from the perspectives of consistency and accuracy, it is agreed that the aforementioned legislation should be referenced in the national policy context section.

Action:

Make reference to the Historic Environment (Wales) Act 2023 in the national policy context section, to read as follows:

"Historic Environment (Wales) Act 2023

This is the first consolidated legislation in the Welsh Government's initial five-year programme to improve the accessibility of Welsh law, and came into full effect in 2024. It provides for the effective protection and management of Wales's historic environment.

With the full commencement of the Act, earlier legislation that provided the legislative framework for the management and protection of the Welsh historic environment — principally the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990 — no longer applies in Wales. The 2023 Act will improve access to, and application of, the relevant legislation, but it will make no changes to the current management and protection of the Welsh historic environment."

3853 Comment

Well-being of Future Generations Act (Wales) 2015 (Well-Being Act)

Summary of Representations:

The Wellbeing of Future Generations Act is about more than housing - the issue with current developments is that, while housing is going up, access to amenities is lacking. My last GP appointment had a 6 week waiting list, I have no dentist due to no access, and the schools are full to capacity with teachers telling me they struggle to cope. We also have threats of leisure centres and libraries closing, which directly affect the wellbeing and health of our population.

Response:

Comments made in respect of the Well-Being of Future Generations Act and the provision of community infrastructure are noted. The Council will continue to work with external stakeholders to ensure that any new developments are delivered with the associated community infrastructure.

Action:

No amendment required.

2023 Comment

Active Travel (Wales) Act 2013

Summary of Representations:

This has come up before, and while great in theory, it's almost impossible to cycle anywhere in Caerphilly due to the hills and valleys, and also the dangerous roads

Response:

The Council has updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and new routes. The Welsh Government has approved the ATNM. The plan will seek to give effect to the provisions of these initiatives in land use terms, so far as it is able.

The advent of electric bikes means that topography is less of a barrier to cycling now.

Action:

No amendment required.

2024 Comment

Planning Policy Wales Edition 12 (2024)

Summary of Representations:

Planning Policy Wales states that previously developed land should be used first, there are a number of greenfield sites in scope as part of the plan.

Response:

PPW advises that previously developed land (brownfield sites) should be identified for development before greenfield sites, where brownfield sites are viable, deliverable and in sustainable locations. The Adopted LDP included a brownfield led strategy of the development of the southern connections corridor and this has been largely successful. Consequently, the brownfield sites that are still available within the area require significant public sector intervention to facilitate their redevelopment and the Council is working with the Welsh Government and the private sector to unlock these sites wherever possible.

This is also the case throughout the County Borough. Whilst there are a number of brownfield sites across the County Borough, these sites generally require significant remediation and reclamation before development can take place and this means that the development of most of these sites is not viable and so cannot be included in the emerging plan unless mechanisms to unlock them have been identified and can be achieved.

The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Greenfield development is essential to deliver the overall requirements of the plan.

Action:

No amendment required.

2037 Comment

Future Wales - The National Plan 2040 (Welsh Government, February 2021) (Future Wales)

Summary of Representations:

Policy 6 not followed: large developments proposed outside town centres.

Policy 7 not followed: new homes are no longer affordable for young people.

Policy 8 (flooding) not considered during a planning application, and drainage of sites is left to the developers.

Policy 9 not followed: development proposed on greenfield sites.

Response:

Policy 6 - Town Centre First: This does not apply to housing proposals. Also, the sequential approach allows some development to take place outside of town and city centres.

Policy 7 - Delivering Affordable Homes: Under 2RLDP policy PS12 (Affordable Housing Target), 1,360 affordable dwellings would be built before the end of 2035. Each 'affordable dwelling' would have to fit Welsh Government's definition of an 'affordable dwelling' (see section 5 of WG Technical Advice Note 2: Planning and Affordable Housing).

Policy 8 - Flooding: The Council does consider flooding when it assesses planning applications, and adheres to applicable national policy as set out in TAN 15.

Policy 9 - Resilient Ecological Networks and Green Infrastructure: This policy does not rule out development on 'greenfield' sites. While a matter for the Deposit plan, the site selection process will adhere to the prioritisation of previously developed land as set out in national policy.

Action:

No amendment required.

2038 Object

Summary of Representations:

Detailed boundaries of Green Belt established as part of SDP. Future Wales says that LAs shouldn't permit development in areas shown for consideration for Green Belts until SDP adopted.

Pre-Deposit plan lacks a policy that confirms the extent of the proposed Green Belt in Caerphilly (to include Ruperra Castle and its parkland). 2RLDP needs a policy on development proposals in what might become the Green Belt. CCBC will have a 'policy vacuum' without it.

Response:

Future Wales Policy 34 - Green Belts in the South East sets the requirement for the Strategic Development Plan to designate a green belt to the north of Cardiff, Newport and the eastern part of the region to manage urban form and growth. Future Wales Policy 19 - Strategic Policies for Regional Planning clearly identifies that the designation of the green belt and its boundaries is a matter for the SDP and are not a matter for local development plans. Given this the LDP does not have the power to pre-determine what the SDP will identify as green belt land and what it will not.

Furthermore the Regional Strategic Diagram for south-east Wales, which shows the area for consideration for green belt, does not identify a green belt boundary and is a diagram, not a plan or scale map. Consequently it cannot be assumed that the land comprising Ruperra Castle and its parkland would form part of the regionally designated green belt, and it would be inappropriate for the LDP to consider it to be. Consequently there is no basis to include the suggested changes or policy.

Action:

No amendment required.

2513 Comment

Building Better Places - The Planning System Delivering Resilient and Brighter Futures: Placemaking and the Covid-19 recovery (WG, July 2020)

Summary of Representations:

2.26 staying local, how is this promoted when out of town stores, local shops, banks are closing. Active travel and exercise not focused on - paths are dangerous, littered with glass and lack of lighting. Only sorted when request made to the council.

Response:

The detailed policies that will be included in the Deposit plan will address the issue of town centre vibrancy and vitality. Policy PS7: Placemaking Principles outlines areas of improvement for local communities in terms of walking distances, creating permeable networks of streets and encouraging green infrastructure development within local communities. These plans shall seek to create safer and more community-focused areas which promote active travel and exercise.

Action:

No amendment required.

2039 Comment**Prosperity for All: A Low Carbon Wales (2019)****Summary of Representations:**

Walking is not promoted. I only live 2 miles from my place of work but there are no safe routes to walk in the winter months due to unsafe pathways and lack of pavements on the roadways. Therefore have to have a car to travel two miles!!

Response:

Prosperity for All: A Low Carbon Wales (2019) has been referenced as part of the national context, and is a series of documents prepared by Welsh Government which have been taken into account. Welsh Government is responsible for the publication of this document and therefore no changes will be made.

However, the 2RLDP seeks to promote sustainable development and active travel, which will actively improve walking and cycling routes for local residents, reducing the need to travel by car for short trips.

Action:

No amendment required.

2040 Comment**Corporate Joint Committees****Summary of Representations:**

The HBF suggests that there is a lack on information on the role of the SDP and its likely trimmings. This should be included in the plan.

Response:

Reference is made to the corporate joint committees and their role in preparing Strategic Development Plans. Given that preparation of the Cardiff Capital Region SDP is yet to commence, it is not considered that there is a need for a substantial amendment. However, acknowledgement of the position of the SDP within the development plan hierarchy would be helpful.

Action:

In the Corporate Joint Committee section, the position of the Cardiff Capital Region SDP within the development plan hierarchy should be set out, along with an explanation of how the SDP will eventually relate to the 2RLDP.

3347 Comment**Regional Collaboration****Summary of Representations:**

HBF notes that the Welsh Government raised a number of concerns to the previous Deposit plan submitted in 2022 including 'Regional Collaboration - Further clarity required'. However it appears there has been little or no change to this section of the document, which runs the risk of another delay in the plans adoption.

Response:

The Welsh Government response to the Pre-Deposit plan in 2022 specifically addressed the issue of how the proposed growth for the County Borough, which was covered by the preparation of the Regional Assessment of Future Growth and Migration for the Cardiff Capital Region Report. This is set out in Evidence Base Document EB21.

As a result, Welsh Government has confirmed that the plan is in general conformity in their response to the Revised Preferred Strategy, Welsh Government has also identified that further explanation of the regional approach is required for the Deposit stage, but this comment is no longer a conformity objection. Addressing this Welsh Government representation will be the appropriate means of taking account of this matter.

Action:

No amendment required.

3346 Comment**Summary of Representations:**

Torfaen like Caerphilly is also within the 'South East Wales Strategic Growth Area'; and National Policy requires regional collaboration to show the issues and interactions between LPA's have been considered to ensure 'the right development

is provided in a sustainable manner in the right place'. Therefore, we suggest matters for a 'SubRegional Statement of Common Ground' with Blaenau Gwent, Caerphilly, Monmouthshire, Newport and Torfaen should include: -

- Proposed Housing and Economic Growth Levels in the sub-region - consideration of population & migration, proposed housing & employment growth, including comparative information on the main sustainable settlements where that growth is proposed or could be located (e.g. a SEWSPG methodology sustainable settlement assessment (to consider the level of sustainable transport & accessibility; the availability of facilities & services; and the level of employment provision / opportunities in each settlement), rolled forward LDP sites, existing planning permissions, available sites within the urban area (inc. 'brownfield'), affordable housing need / shortfall, proposed RLDP sites, etc.)
- Green Belt / Green Wedges and Special Landscape Areas; and
- Commuting Patterns and Transport, etc.

Response:

The strategy has been prepared within the context of the requirement to undertake regional collaboration, and this will continue. The Council will continue to work with the other authorities in the region in moving forward with the plan and will issue joint evidence to support the plan where appropriate.

Action:

No amendment required.

3818 Comment

Climate Emergency and The Decarbonisation Strategy

Summary of Representations:

2.44 offset with tree planting. So it is ok to use green land for housing and demolish the area including grassland and trees but how many trees will be replaced - not even near the number destroyed by developing green land.

Response:

The Decarbonisation Strategy has been referenced as part of the local context, and is one of a number of Council prepared documents that have been taken into account. However, the Decarbonisation Strategy was adopted by Council in November 2020 and therefore no changes will be made.

In terms of the loss of trees, national planning policy is clear in that for every tree removed or lost, three new trees of a similar type must replace them.

Action:

No amendment required.

2041 Object**Housing Strategy: An Agenda for Change 2021 – 2026
(Housing Strategy)****Summary of Representations:**

How will adding hundreds of homes to an area where it takes weeks to get a doctors appointment at present aid in promoting health and wellbeing and improving health outcomes.

Response:

The purpose of the Pre-Deposit plan is to identify the Revised Preferred Strategy that sets out the land requirements for the plan period and also provide a high-level policy framework within which detailed policies and site allocations can be developed. Consequently the Pre-Deposit plan does not set out detailed policies addressing how infrastructure issues will be addressed. This will be set out in the Deposit plan, which is the next stage in plan preparation.

The Council will continue to work with external stakeholders to ensure that any new developments are delivered with the associated community infrastructure.

Action:

No amendment required.

2042 Object**Summary of Representations:**

Suggest that the bullet point 'Delivering new homes' should be reworded to include the phrase 'across all tenures' to make it clear that the strategy is not just about delivering affordable homes.

Response:

The Housing Strategy: An Agenda for Change 2021 – 2026 (Housing Strategy) has been referenced as part of the local context, and is one of a number of Council prepared documents that have been taken into account. However, the Housing Strategy was approved by Council in October 2021 and therefore no changes will be made.

It should be noted that the plan clearly identifies that affordable and market housing needs to be delivered. The plan references this in Issue NR4, the Vision, Key Aim I and paragraph 7.17 of the preamble to Policy PS11.

Action:

No amendment required.

3345 Object

3Key Land Use Issues

Summary of Representations:

No objections to any plans for development on land which is available for consideration within the LDP. My rationale for my decision is that the area requires development for the future in terms of improved housing, industry, education, health, retail outlets, employment and recreation in order for the area & residents to prosper.

Response:

The comments made in support are noted.

Action:

No amendment required.

2293 Support

Summary of Representations:

I feel much of the land and green space, within the area have been under utilised for many years due to a reduction in the number of working farms related to crop and livestock agriculture.

Therefore the majority of the agricultural land and green spaces would be fully utilised with plenty of parkland, country walks and cycle and bridle ways available within the area for all the enjoy.

Response:

The comment is noted.

Action:

No amendment required.

2294 Support

Summary of Representations:

The plans again seem to centre on family homes not 1- or 2-bedroom properties. We have an ageing population plus other social factors created by austerity, family breakdowns, homelessness and bereavements etc all indicate an increased need for smaller properties.

Housing development in line with legislation seems out of sync particularly with PPW, WBFG and Environmental Acts, Active Travel Acts and Socio-Economic Duty Equality Acts. Plus, concepts of "Placemaking" seem skirted around and used as an when required as opposed to a central pillar of development and community wellbeing.

Population growth rates, (Welsh Government 2018) quoted in the plan indicates that CCBC, LDP is showing an overprovision on projections again. With some 2,355 more homes than expected requirements. Coupling this to the questions over the growth of population then again, the plan appears over exuberant.

If the candidate sites from the extant plan and some brownfield sites from the new plan are all advanced with void or underutilised premises brought back into use sufficient housing provision can be achieved. Without the need for Greenfields developments of medium size estates in out-of-town locations.

Response:

The strategy has been prepared, and candidate sites will be assessed, in accordance with national policy. A placemaking policy requiring that the principles of placemaking are considered is included (PS7).

The approach taken with regard to the population and household projections and use of scenarios, which take account of demographic factors and the impact on household size, is set out in background paper EB4 - Population and Housing Growth Options. As required, the most recent Welsh Government projections were used as a starting point but it is considered that the housing land requirement proposed is appropriate, given the plan's objective to assist in the perpetuation of an economically sustainable population structure.

Action:

No amendment required.

3403 Comment

Summary of Representations:

Objection to the use of greenfield sites for housing or employment for long-term health and economic reasons.

Response:

Preparation of the plan, and assessment of candidate sites, will be undertaken within the context of national policy, including that concerning the development of greenfield land.

Action:

No amendment required.

3716 Object**Summary of Representations:**

- The separation of this section into environmental, economic, social and cultural issues means that the interrelationship between issues has not been given sufficient weight E.g. economically viable, vibrant but also healthy town centres.
- This separation of issues also means that there is insufficient focus on a sense of place. Whilst the Placemaking Principles are referred to, they are not currently woven sufficiently into the plan.

Response:

National policy identifies environmental, economic, social and cultural factors as the four pillars of sustainability and the plan sets out issues on this basis.

Individual environmental, economic, social and cultural issues are implicitly interrelated and it should not be inferred that this is not the case, simply due to the method by which they have been presented. The plan is clearly prepared in accordance with national policy, which locates all development, and all topics, within the context of well-being, and which is the most appropriate means of addressing such interrelationships.

A more detailed application of the placemaking principles will be evident in the development management policies, which will be included in the Deposit plan.

Action:

No amendment required.

3718 Object**Summary of Representations:**

Suggest inclusion of additional Strategic Policy on Health.

This policy would recognise the contribution of the built and natural environment to the health and wellbeing of the whole population of Caerphilly County Borough, and would support the tackling of health inequalities.

Response:

Health is a consideration in, and is affected by, a range of issues. Clearly, there are implications for several policy areas for which explicit policies have been formulated, and the Council will work with the Health Board in terms of ensuring that its priorities are given effect in land-use terms through the 2RLDP. This will include the proposed allocation of sites for health-related facilities within the Deposit plan.

Action:

No amendment required.

3734 Object**Summary of Representations:**

We note that Chapter 3 sets out the key land issues facing the County. We advise that the nature emergency should be included as a key land issue, referencing the need to reverse the decline of biodiversity and the role the RLDP can play. We would suggest that this issue is either added to Key Issue NR1 or added as a separate issue.

Response:

It is agreed that the nature emergency recognised by the Senedd constitutes a national issue which has specific implications in land-use terms. While there is some overlap with issues EN1 and EN4, it is considered suitable to make reference to it in the same vein as climate change.

Action:

Amend NR1 to read as follows:

"Climate change is a global issue that will require action at all levels, and the loss of biodiversity on a national level has been recognised by the Senedd's declaration of a 'nature emergency'. The 2RLDP will need to address the issues causing climate change and biodiversity decline, and ensure appropriate resilience and mitigation measures are fundamental elements in the design and layout of all new development."

3790 Comment**Summary of Representations:**

The Key Issues, Challenges and Opportunities facing Caerphilly have been outlined and the position of the RLDP in addressing these issues, including the Vision and Objectives is understood.

Response:

The comments made are noted.

Action:

No amendment required.

3815 Comment**National and Regional Issues****Summary of Representations:**

NR4 if there is a housing shortage why is land that already has planning permission allowed to be left undeveloped.

Response:

The Council has limited power in respect of undeveloped sites, particularly those where development has 'commenced'. Sites with extant planning permission are taken into account when arriving at the housing land requirement. However, in calculating the components of housing supply, only sites with planning permission that are considered to be realistically likely to come forward during the plan period have been considered.

As part of candidate site assessments, site promoters will need to demonstrate both viability and deliverability for a site to be considered for allocation.

Action:

No amendment required.

2043 Object**Summary of Representations:**

General support for NR4, NR7, EC4 and S01 but concerned, however, that the growth ambitions set out later in the Revised Preferred Strategy will not fully address housing shortages in Caerphilly or provide a level of growth in line with the national growth designation.

Response:

The level of housing growth in the plan was identified through consideration of a wide range of issues and growth options and has been developed as part of the engagement process. The evidence and considerations associated with this are set out in detail in Evidence Base Document EB4 - Population and Housing Growth Options. This includes the County Borough's position within the Cardiff, Newport and the Valleys National Growth Area as set out within Future Wales, as well as the implications of the Cardiff Capital Region's aspirations for job creation and economic growth.

Action:

No amendment required.

3220 Support**Summary of Representations:**

HBF supports that the plan recognises the need and role of the market housing.

Response:

The comments made in support are noted.

Action:

No amendment required.

3344 Support**Summary of Representations:**

Introduce a new NR (8) confirming that minerals supply is essential to deliver, all elements of economic growth from housing to green infrastructure and flood alleviation; transport to schools and hospitals.

Response:

The pertinent point in relation to the representation is the need to recognise the desire for economic growth, which is already addressed through several key issues that underpin it, rather than explicit reference being made to economic growth itself. In that respect, it is considered appropriate to include a new EC9 recognising the role of aggregate supply. As a result, there is no need to include a new NR8 reference.

Action:

Include a new Key Issue EC9 to read:

"The supply of aggregates is necessary in order to help facilitate new development. The 2RLDP will ensure that the need for an appropriate level of supply is met, having regard for relevant environmental considerations."

3298 Object**Summary of Representations:**

National and Regional Issues (NR1- NR7)

Suggest need to include an additional point here on health inequalities.

Response:

While the ability of the 2RLDP to positively address health inequalities will be limited, it is accepted that the persistence of such factors is a national issue alongside the others set out.

Action:

Include a new Key Issue NR8 to read as follows:

"Health inequalities are a national issue in Wales, with people living in the most deprived areas having on average 17 fewer years of healthy life than people in the wealthiest ones. The 2RLDP should seek to give effect, insofar as it is able, to measures which contribute to addressing this, in land-use terms."

3719 Object**Environmental Issues****Summary of Representations:**

I support the inclusion of these issues clearly within the plan.

In general I would suggest that throughout this plan the word order in regards to climate change mitigation should take precedence. In most instances, it seems to come second i.e. after adaptation or resilience. This goes against the reality that mitigation is the priority in order to ensure that even more costly adaptation does not have to occur in future.

Response:

The comments made in support are noted.

The approach taken with regard to climate resilience will adhere to relevant legislation and national planning policy. The word order does not convey a prioritised list, but a set of equally contributing elements, combined with the policy framework that seeks to address the causes of climate change in planning terms.

Action:

No amendment required.

3146 Support**Summary of Representations:**

EN1 Cannot see any identified sites suitable for renewable energy proposals? Mine water heat maps for the borough are available and can be overlaid with brownfield sites suitable for development and may make brownfield sites more attractive.

EN5 states that you will consider development on greenfield sites where insufficient brownfield sites can be identified 'and are viable' yet there isn't anything within your 2LDP that proactively identifies brownfield sites. On the map of candidate sites it appears once again that many of the sites identified are greenfield not brownfield sites. Can more be done to identify brownfield sites?

Response:

EN1: The Council has undertaken a Regional Low Carbon Energy Assessment, EB13 - Regional Low Carbon Energy Assessment. On the basis of this assessment and in accordance with PPW, the Council will be setting targets for renewable energy deployment in the Deposit plan and in order to support attainment of the targets set it will require supportive, clear criteria-based policies for all renewable energy technologies.

EN5: Whilst there are a number of brownfield sites across the County Borough, these sites generally require significant remediation and reclamation before development can take place and this means that the development of many of these sites are unviable and so cannot be included in the emerging plan unless achievable mechanisms to bring them forward have been identified. The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Greenfield development is essential to deliver the overall requirements of the plan.

Action:

No amendment required.

2217 Comment

Summary of Representations:

The quantity of brownfield land versus greenfield land being considered should be published to show that EN5 is being followed.

Response:

The Adopted LDP included a brownfield led strategy of the development of the southern connections corridor and this has been largely successful. Consequently, the brownfield sites that are still available within the area require significant public sector intervention to facilitate their redevelopment and the Council is working with the Welsh Government and the private sector to unlock these sites wherever possible. This is also the case throughout the County Borough. Whilst there are a number of brownfield sites across the County Borough, these sites generally require significant remediation and reclamation before development can take place and this means that the development of most of these sites is unviable and so cannot be included in the emerging plan unless mechanisms to unlock them have been identified and can be achieved. An assessment of previously developed land within the County Borough has been undertaken and will be published to support the Deposit stage of the plan.

Action:

No amendment required.

2044 Comment**Summary of Representations:**

Policy PS8 would benefit from including reference to the importance of protecting designated SSSIs, landscapes and parks.

Response:

Policy PS8 as a strategic policy outlines the key functions which must be considered as part of maintaining and enhancing green and blue infrastructure assets. More detailed policies for each function will be set out within the Deposit plan.

SSSIs are legally protected by the Wildlife and Countryside Act 1981, and it would be inappropriate for the plan to include this.

The requirement to maintain a register of historic parks and gardens is set out in Section 192 of the Historic Environment (Wales) Act 2023. Whilst these sites receive protection through the planning system, this protection will be delivered through development control policies that will be included in the Deposit plan.

As the protection of all of these sites is set out in different legislation it would be inappropriate for the plan to include this.

Action:

No amendment required.

2515 Comment**Summary of Representations:**

EN4 - We consider to read as more of an aim or objective rather than an issue. We agree there is an issue within the County regarding the lack of, and the need to improve, green and blue infrastructure. We can help with referencing the relevant evidence to frame this issue, for example using national measurements such as SoNaRR, or on a local scale, such as Water Framework Directive status and protected sites assessments. Any local evidence on Resilience Ecological Networks can also support this issue.

Response:

The comments in regards to EN4 are noted. Detailed policies will be included within the Deposit plan which will address each of the key issues outlined within this section. The Council will consider the points raised as it moves towards the Deposit stage.

Action:

No amendment required. Provide further clarity on the key environmental issues at the Deposit stage.

3791 Comment**Summary of Representations:**

While we support the hierarchical approach under EN5 which seeks to utilize brownfield land before greenfield land, this too reads more as an aim or objective, rather than an issue. We also think it would be useful to reference that brownfield sites will often contain ecological value, which will also require maintaining and enhancing.

Response:

The comments in regard to EN5 are noted. The Council will consider the points raised as it moves towards the Deposit stage. The issue of ecological value and brownfield land will be further considered as part of the Green Infrastructure Assessment.

Action:

No amendment required. Provide further clarity on the key environmental issues at the Deposit stage.

3792 Comment**Summary of Representations:**

EN6 highlights that the county contains priority habitats that support ecological connectivity. However, ecological connectivity on a landscape scale needs to be improved and increased. The RLDP can help achieve this. We recommend referencing the Southeast Area Statement, and specifically the Linking Landscapes theme here. This issue can then be followed through into aims and objectives by stating how the RLDP should support and enhance priority habitats and their networks, maximize opportunities for net benefit for biodiversity and improve the ecological links through Resilient Ecological Networks (RENS).

Response:

The comments in regard to EN6 are noted. The Councils Green Infrastructure Assessment (EB20) has set out the key environmental issues facing the County Borough, in addition to highlighting the importance of priority habitats and ecological connectivity as outlined with the South East Wales Area Statement. The Council will consider the suggested amendments as it moves towards the Deposit stage.

Action:

No amendment required. Provide further clarity on the key environmental issues at the Deposit stage.

3793 Comment

Summary of Representations:

Local generation of renewable energy is needed, where biodiversity of peat uplands won't be harmed and Welsh homes and businesses can use it directly.

Response:

The Council will promote renewable energy schemes where they do not have an impact upon important areas for biodiversity and habitat. Peatlands are considered of high importance, and will be protected where they have been identified by the Councils Green Infrastructure Assessment (EB20).

Action:

No amendment required.

2093 Object

Summary of Representations:

Suggest this section includes a focus on trees. Trees will help to mitigate and adapt to climate change. Need to ensure trees are retained as part of new developments or replaced when this isn't possible.

Response:

Detailed policies will be included within the Deposit plan which will address the retention of trees.

Action:

No amendment required. Provide further policy guidance on the retention of trees at Deposit stage.

4059 Object

Summary of Representations:

EN4 – The 2RLDP will need to ensure the maintenance and enhancement of blue and green infrastructure is a fundamental element in the design of all development. Suggest this be about 'establishing' blue and green infrastructure in the design of all development – not just the maintenance and enhancement. We need to ensure that green and blue infrastructure and provision for nature are incorporated into new developments.

Response:

Green and blue infrastructure is set out under Policy PS8 which sets out the Councils approach towards maintaining and enhancing GBI assets within the County Borough. This is supported by EB20: Green Infrastructure Assessment. In addition,

green and blue infrastructure is a key consideration of placemaking which requires the delivery of sustainable developments which maximize and enhance green and blue infrastructure.

Action:

No amendment required.

4061 Object

Summary of Representations:

Suggest this section includes a focus on the role of local food production in addressing the climate change emergency –

e.g. the 2RLDP will look to support local food production; protecting best and most versatile agricultural land and maximizing opportunities for community food growing.

Response:

While a matter for the Deposit plan, the 2RLDP will seek to protect, as a general presumption, undeveloped land outside settlement boundaries and land within special landscape areas, which will have an implicit benefit for land in agricultural use. Beyond that, however, the ability of a land-use plan to positively address local food production is limited.

Action:

No amendment required.

4057 Object

Summary of Representations:

Suggest this section recognizes and acknowledges the shared agenda between health and environmental issues. Promoting modal shift to sustainable transport will have benefits for health and wellbeing as will delivering renewable energy generation schemes; tackling air quality; and protection and enhancement of greenspaces. Climate change is not only an environmental issue but is also the single biggest threat to public health.

Response:

Comments are noted in regard to the relationship between climate change and health. The Deposit plan will be further supported by updated evidence base documents such as the Green Infrastructure Assessment which will provide a detailed assessment of overall health and well-being and greenspace provision.

Action:

No amendment required.

3720 Object

Summary of Representations:

EN1: Need to highlight link between climate change and impact on health and the need to address the unequal impact across our communities. Exposure to extreme weather e.g. flooding, drought, heat, excess cold will have an unequal impact. People with pre-existing medical conditions, the elderly and those living in social deprivation will all have increased vulnerability and experience more adverse health outcomes relating to climate change. It is also the case that measures to tackle climate change e.g. improved energy efficient housing will also impact on e.g. fuel poverty.

Response:

The comments in regard to decarbonisation and health are noted. The Council will consider the points raised as it moves towards the Deposit stage.

Action:

No amendment required. Provide further policy guidance on decarbonisation and its impact upon health inequalities across the county borough.

4056 Object

Summary of Representations:

Suggest including 'active, safe and affordable' in description of sustainable transport.

Response:

It is implied that sustainable forms of transport combine to create, in a collective sense, an active, safe and affordable transport network.

Action:

No amendment required.

4058 Object

Summary of Representations:

Suggest this includes a focus on preventing air quality issues arising in the first place.

Response:

Suggestion accepted. EN2 will be reworded.

Action:

Environmental Issue EN2 be amended to read as follows:

The 2RLDP will seek to address air-quality problems, particularly those arising from transport-related activity, which has led to the creation of two Air Quality Management Areas (AQMAs).

4060 Object**Economic Issues****Summary of Representations:**

EC5, promoting retail centres does not promote the ability to walk or cycles as these are out of town.

Response:

It is considered that the locations to which EC5 refers are highly accessible in terms of public transport, situated as they are within existing settlements. Measures such as town centre boundaries and site allocations for relevant uses will be formulated and implemented within the context of Future Wales' 'town centre first' policy and Active Travel considerations, as well as the strategy itself which seeks to locate development in relation to existing settlements, in accordance with the settlement hierarchy.

Action:

No amendment required.

2045 Comment**Summary of Representations:**

I don't see Caerphilly council as having a positive impact on tourism or economic growth for the most part of the borough. Sadly it lacks any vision, concentrating solely on the White elephant which is Caerphilly town centre. Removing resources for health and well-being and leisure time, whilst set to build new houses, some of which are on allotments and green spaces, with no plan to increase business to these areas is both foolish and short-sighted.

Response:

The proposed strategy puts forward a framework for development that balances environmental, economic, social and cultural considerations, whilst attempting to ensure the continuation of an economically viable population over the course of the plan period. The level of housing and employment land proposed within the plan correlates with this overarching objective.

The plan will seek to give effect in land use terms to community facilities, leisure and tourism-related priorities through the means of regulatory policies, site allocations and environmental designations.

Action:

No amendment required.

3148 Comment

Summary of Representations:

Introduce a new EC (9) to recognise that minerals supply is essential to economic growth.

Response:

The pertinent point in relation to the representation is the need to recognise the desire for economic growth, which is already addressed through several key issues that underpin it, rather than explicit reference being made to economic growth itself. In that respect, it is considered appropriate to include a new EC9 recognising the role of aggregate supply.

Action:

Include a new EC9 to read:

"The supply of aggregates is necessary in order to help facilitate new development. The 2RLDP will ensure that the need for an appropriate level of supply is met, having regard for relevant environmental considerations."

3299 Object

Economic Issues

Summary of Representations:

EC1 - The County Borough has relatively high levels of economic inactivity, low levels of educational attainment and pockets of deprivation'

- Suggest a focus on 'inclusive economic growth' which could include a requirement for 'Employment and Skills' plans on major developments to support the transition out of manufacturing and with relation to social value.
- Suggest ambition is around 'reducing the gap in levels of economic inactivity and educational attainment'.

Response:

While the amendments suggested are laudible, it needs to be remembered that the 2RLDP is a land-use plan. Reducing the gap between economic inactivity and

educational attainment is an implicit objective. However, it is largely reliant on factors outside the range of influence that planning policies and site allocations possess.

Employment and skills plans are unlikely to bring about increased take-up of employment land, and would add an additional burden to the planning application process, especially in terms of the assessment of such plans.

Action:

No amendment required.

3721 Object

Summary of Representations:

EC2- The rate of employment land take up has been low over the course of the present plan period and there is a significant shortage of available employment land in the Caerphilly Basin to enable companies to expand and grow.

- Suggest could include a focus on 'affordable workspaces'.

Response:

It is considered that EC2, as presently written, implicitly recognises the need for a range of employment floorspace that meets the needs of a variety of sectors and occupiers.

Action:

No amendment required.

4048 Object

Summary of Representations:

EC5: Town and retail centres provide a significant level of employment within the County Borough and the 2RLDP will need to maximise the opportunities for employment within these centres in order to deliver economic benefit.

- Alongside the issue of ensuring that town centres maximise opportunities for employment and delivering economic benefit there are wider issues around the range of businesses and encouraging businesses that contribute to the vitality, viability and diversity of town centres. This should include for example the creation of healthy food environments (e.g. Healthy food retail, limiting new fast-food outlets near parks, schools and leisure centres) and avoiding the overconcentration of betting shops.

Response:

Regulation of commercial businesses in town centre locations is difficult where a level of refinement is proposed that goes beyond use class distinctions. It is considered that national policy (PPW, TAN 4) presently affords LPAs some flexibility in terms of assessing proposals for different uses within different parts of such centres e.g. through primary and secondary areas. Suitable policies regulating town centre uses will be included within the Deposit plan.

Action:

No amendment required.

4049 Object**Summary of Representations:**

EC6 – Tourism is an important part of the economy in terms of ongoing, long-term growth, as well as being a key factor in developing the identity of the County Borough.

- Suggest reference is made to Valleys Regional Park and the potential for this to be nationalised.

Response:

EC6 as presently written clearly recognises the role of tourism within the strategic approach set out. As the tourism evidence base will attest, the Valleys Regional Park forms an important regional consideration and will clearly influence any policies included in the Deposit plan, as well as related site allocations/designations.

Action:

No amendment required.

4050 Object**Summary of Representations:**

Beautiful iconic landscapes are being decimated to build giant renewable energy complexes on uplands. Tourists don't want to visit Wales to see a giant windfarm. The giant interlinked renewable energy development on Mynydd Maen will be visible from the Severn Crossing.

Cwmcarn Forest Drive and the views from Twmbarlwm will be permanently destroyed. The tourism industry will suffer badly. Renewable energy generation needs to be small and local

Response:

Detailed policies regarding particular land uses will be included within the Deposit plan. All proposals will be required to adhere to the renewable energy position set out in Future Wales, as well as national policy.

Action:

No amendment required.

2094 Object**Social Issues****Summary of Representations:**

SO1: If deaths will exceed births, why does the borough need so much housing? Will houses just sit empty? How will the council attract people to Cefn Hengoed?

Response:

The issue of a declining population raises very significant issues for the County Borough, not least the loss of population would mean that there would be a reducing working age population that would result in a decline in the County Borough's economy. This would mean that the Council would need to plan for economic recession. This would be at odds with the regional economic aspirations of the Cardiff Capital Region (CCR) that is seeking a 3.5% growth in jobs over the CCR City Deal period. The Council did not consider the option of recession to be one that it should pursue, and a range of alternative population projections were considered as options for the Preferred Strategy. These are set out in

Evidence Base Document EB4 - Population & Housing Growth Options. The Council considered the best projection for the County Borough to be one that addresses the need to ensure an economically active population to ensure that there are sufficiently economically active people to deliver the level in growth that the CCR are expecting across the region, namely an approximate 3.5% increase in jobs. The proposed level of growth underpinning the Preferred Strategy is above the Welsh Government MYEs for clear and obvious reasons, and the projections have been specifically selected to address the issues facing the County Borough, particularly to increase the number and level of jobs in the County Borough.

Action:

No amendment required.

2046 Object**Summary of Representations:**

Where will people go for their mental and physical health when the peat uplands are covered in giant interlinked energy developments, quarries and roads? When the

wildlife has left and all that is left is concrete and giant wind turbines? The local people highly value their open green moorlands. Renewable energy generation needs to be small and local, close to the point of usage - not in wild open spaces that people use for their health and wellbeing

Response:

National policy in Wales supports the generation of energy from renewable resources, including onshore wind power. Policy 17 of Future Wales states: "The Welsh Government strongly supports the principle of developing renewable and low carbon energy from all technologies and at all scales to meet our future energy needs."

A significant proportion of the County Borough has been identified as forming part of a Pre-Assessed Area for Wind Energy.

Future Wales policy 17 states "In Pre-Assessed Areas for Wind Energy the Welsh Government has already modelled the likely impact on the landscape and has found them to be capable of accommodating development in an acceptable way. There is a presumption in favour of large-scale wind energy development (including repowering) in these areas."

It is a national policy position to promote onshore wind energy, and with the Pre-Defined Areas there is a presumption in favour of it. The Objectives are correct in referencing the need for wind energy generation.

Future Wales Policy 17 also sets out support for renewable energy generation "at all scales" and this will support small and local generation also.

Action:

No amendment required.

2097 Object

Summary of Representations:

SO1: 'Natural Change has been a key element in the County Borough's growth throughout history.

The use of the terms 'natural change' and 'negative natural change' suggests that the number of deaths exceeding the number of births is a natural phenomenon, rather than something that can be influenced by e.g. healthcare or health enhancing communities. Suggest removal of word 'natural'.

Response:

'Natural population change' is an established term in demography and planning. Using an uncommon alternative might lead to confusion.

Action:

No amendment required.

3722 Object**Summary of Representations:**

Suggestion: Make various changes to SO2. Suggested re-wording:

The County Borough has a relatively high level of life limiting long-term illness and low life expectancy as well as significant inequalities in health. The 2RLDP should seek to enhance community health and wellbeing through the creation of healthy places and inclusive, equitable communities; ensuring that health is designed into the built environment, public realm, green spaces and infrastructure.

Response:

The suggested changes are noted, but it is considered that SO2 as presently written sufficiently summarises the capability of a land-use plan to address these matters.

It is agreed that reference should be included to 'significant inequalities in health'.

Action:

Amend the first sentence of issue SO2 to read as follows:

“The County Borough has a relatively high level of limiting long-term illness, low life expectancy and significant inequalities in health”.

3723 Comment**Summary of Representations:**

Suggestion: Make various changes to SO3.

Recognise the ‘changing needs of the town and retail centres’ in terms of the changing needs of the local community and the link with health and wellbeing, rather than just from an economic perspective – i.e. the changing needs of retailers / businesses.

Response:

The 'changing needs of town and retail centres' are made clear in national policy. The links between the social and economic role of town centres and their importance to community cohesion and personal well-being are implicitly understood.

Action:

No amendment required.

3724 Object

Summary of Representations:

Suggestion: Make various changes to SO4.

Suggest this includes 'enhancing opportunities to be active' rather than being limited to provision of sport and recreational space, and makes reference to 'accessible green space'.

Response:

It is agreed that the issue should make reference to access to formal green space, as well as provision, and also to accessible green space.

Action:

Issue S04 be amended to read as follows:

The 2RLDP will seek to protect and improve the provision of, and access to, formal urban natural green space; and accessible, informal green space; and seek to address issues in the provision of sport and recreational space across the County Borough to promote the well-being of residents.

3725 Object

Summary of Representations:

Suggestion: Make various changes to SO5.

Suggest health care services are included within the definition of 'community infrastructure'.

Suggest that in addition to the Council needing to work with public sector bodies to identify land there is the need for developers to engage with the Health Board at an early stage of developments so that impact on healthcare services can be fully assessed.

Response:

The inclusion of health care services within the term 'community infrastructure' should be implicitly recognised. Whilst it is agreed that developers should engage with the Health Board in terms of specific proposals, the issues set out measures that the LDP itself can take in terms of addressing pertinent matters, such as the identification of land, rather than procedural matters in respect of planning applications. There may be scope for the latter to be addressed, however, through the application of specific policies.

Action:

No amendment required.

3726 Object

Summary of Representations:

SO6 and SO7

SO6: Underpinning development with sound Placemaking Principles is the way to deliver sustainable development and resilient communities.

- Suggest that the division of the issues into social, environment, economic and cultural has made it harder to embed a sense of place into the RLDP. This has also meant that the interrelationships between issues and factors e.g. health and environment or health and economy have been missed.
- Suggest expanding on concept of Placemaking Principles to support understanding of the RLDP by public.
- Suggest further embedding the Placemaking Principles throughout the Issues / Aims and Objectives.
- Placemaking Principles do not currently include any references to sustainable food. Suggest that consideration be given to local food growing and access to food as part of Place Making.

SO7: The County Borough includes areas of high deprivation. The 2RLDP will need to facilitate measures that will alleviate deprivation through land allocations and a flexible policy framework.

- Needs greater clarity and elaboration on what is meant by this statement.
- Suggest replacing 'alleviate' with 'prevent'.

Response:

SO6: Individual environmental, economic, social and cultural issues are implicitly interrelated and it should not be inferred that this is not the case, simply due to the method by which they have been presented. The plan is clearly prepared in accordance with national policy, which locates all development, and all topics, within the context of well-being, and which is the most appropriate means of addressing such interrelationships.

A more detailed application of the placemaking principles will be evident in the development management policies, which will be included in the Deposit plan.

SO7: The 2RLDP is a land-use document and its likely impact in terms of alleviating deprivation is therefore limited. However, it can play a role in terms of providing a robust development framework that, among other things, gives effect in land-use terms to publicly-orientated priorities of partner organisations. Minor amendments with a view to assisting clarity are agreed.

Action:

Issue SO7 be amended to read as follows:

The County Borough includes areas of high deprivation. The 2RLDP will seek to assist in the alleviation of deprivation through the formulation of a robust, sustainable and pragmatic framework for development, and by giving effect in land- use terms to interrelated public priorities, where relevant.

3727 Object

Cultural Issues

Summary of Representations:

CU2: The 2RLDP should consider new development within the context of the variety of heritage assets, and their setting, that exist within the County Borough. This policy offers no protection for heritage assets - it merely refers to 'consideration' and does not take into account preservation or enhancement. Any new development should, at minimum, seek to preserve and enhance heritage assets.

CU4: Large number of heritage assets through reuse could provide housing and mixed-use economic resource. The 2RLDP should maximise opportunities for adaptive reuse of built heritage to assist town centre regeneration and increase potential for rehabilitation of empty sites housing and economic regeneration. Policy should refer specifically to listed buildings. Should also include a caveat about sensitive and appropriate reuse.

CU6: No draft heritage policy addressing the value of sites of multiple heritage, ecological and landscape designations and importance of protecting special character and value. Suggest further policy required to the effect: 'Protection of County Borough's natural, historic and landscape assets that give it a unique identity, with more weight being given to this protection where sites benefit from multiple designations.' Concern with recent decisions at Ruperra, namely the future of the site as an integrated estate. Recent decisions failed to take into account cumulative negative impacts despite multiple layers of designations.

Response:

Comments made in relation to heritage policies are noted. Detailed heritage policies addressing the protection of heritage assets and their consideration in the determination of planning proposals will form part of the Deposit plan policy framework.

Action:

No amendment required.

2517 Comment

2522 Comment

2528 Comment

Summary of Representations:

Concern that Llancaiach Fawr and The Winding House have been neglected for tourism and Caerphilly Castle the only focus. Council has missed an opportunity to connect heritage assets and nature attributes. Tourism sector is 'short- sighted'.

Response:

The comments are noted. Policy PS11, along with national policy and Future Wales, will establish the context for more detailed proposals concerning the provision, protection and enhancement of tourism-related facilities (which will be set out within the Deposit plan) and have regard to applicable initiatives such as the Valleys Regional Park.

Action:

No amendment required.

3149 Comment

Summary of Representations:

Landscape is a key part of our heritage. Views from local hills are iconic and there are ancient Bronze age barrows and cairns on the uplands. These will be destroyed by energy farms which will industrialise multiple hillsides. Need to move away from this and toward renewable energy in local areas.

Response:

The Deposit plan will include a detailed policy framework that will include policies that will seek to encourage the use of renewable energy and its technologies. Allied to this is an increased emphasis on the delivery of green and blue infrastructure and the protection of landscape and biodiversity for both health and well-being and nature conservation purposes.

Action:

No amendment required.

2098 Object

Summary of Representations:

Archaeology and historic environment are important to the County Borough. Includes designated and non-designated historic assets. Plan notes the historic assets which are statutorily protected (48 Scheduled Monuments, 376 Listed Buildings, 5

Registered Parks and Gardens and 1 Registered Historic Landscape of Outstanding Historic Interest) however these are a small proportion of the sites recorded in the Historic Environment Record, with 2112 core records and 90 event records (considered non-designated historic assets).

Response:

The Cultural Issues currently outlined within the Preferred Strategy considers heritage assets and their value to the County Borough.

Detailed heritage policies addressing the protection of heritage assets and the consideration of non-designated assets in the determination of planning proposals will form part of the Deposit plan policy framework.

Action:

No amendment required.

3854 Comment

Summary of Representations:

Range of archaeological remains includes large scale representation of minerals/metals exploitation, as well as prehistoric upland settlement patterns, information on isolated finds, which contribute to the heritage of the area. Should not be seen as constraints to development, planning land use change/non-planning use change, but viewed with Well Being of Future Generations Act 2015, contribute to well-being goals of culture/community and by understanding/enhancement of remaining goals.

Response:

The Cultural Issues outlined within the current Preferred Strategy consider the enhancement and understanding of heritage assets for the future well-being of the County Borough.

Detailed heritage policies addressing the protection of archaeological assets and their consideration in the determination of planning proposals will form part of the Deposit plan policy framework.

Action:

No amendment required.

3855 Comment

Summary of Representations:

CU5 and CU6 are key land use issues and recognise the significance and contribution of the historic environment to placemaking and the economy.

Response:

The comments on CU5 and CU6 are noted.

Action:

No amendment required.

3856 Comment**Summary of Representations:**

Balancing tourism and education regarding archaeology and the historic environment also needs to be considered from an impact viewpoint, such as increased visitor numbers. This is an issue being considered globally and can be mitigated where visits are limited by time, areas of access, and visitor tax. Also has impacts economically and on wellbeing, where outdoor walking, social prescribing, engaging with heritage and historic sites is being promoted.

Response:

The comments on balancing tourism and education regarding archaeology from an impact viewpoint are noted. The Cultural Issues outlined within the Preferred Strategy focuses on the enhancement of tourism through heritage assets.

However, the operation of tourist facilities, including time limitations, restricting access and taxes are not land use matters and cannot be addressed by the plan.

Action:

No amendment required.

3860 Comment**Summary of Representations:**

Commented on the Candidate Sites submitted to recommend mitigation that may be necessary for some sites, due to impacts on the archaeological deposits from proposed development. Climate change and its effects such as flooding, desiccation, leading to erosion and other severe weather events that have an impact on the historic environment should also be considered. Includes fragile finite remains which are anaerobically preserved, and evidence of prehistoric/early historic activity which is contained in peats, and in pollen and seed remains.

Response:

The Cultural Issues outlined within the Preferred Strategy highlight considerations of the setting of candidate sites in the context of heritage assets and how new developments may impact such.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3861 Comment

4The Strategic Vision, Aims and Objectives

Summary of Representations:

Broad support for Vision, Aims and Objectives.

Response:

The comments made in support are noted.

Action:

No amendment required.

3479 Support

3490 Support

3495 Support

3500 Support

3507 Support

The Vision

Summary of Representations:

Unclear what the vision/goals/aims are. Objectives not necessarily appropriate in terms of achieving the aims.

Response:

The Vision is clear . It is considered that the objectives represent a logical progression from the vision, by way of the goals and aims, in terms of establishing a practical framework for the formulation of policies.

Action:

No amendment required.

2337 Object

Summary of Representations:

Support for vision. However, it is impossible to achieve and the respondent does not agree with the approach to renewable energy.

Response:

The comments made in support are noted. While the vision sets out the overarching aspiration, the policy framework will be the means by which the Council will seek to realise it. The degree of success will be assessed through the monitoring framework.

The approach taken with regard to renewable energy will adhere to national policy and Future Wales.

Action:

No amendment required.

3236 Comment

Summary of Representations:

The HBF in particular supports the statement:

'Addressed the housing crisis through the provision of affordable and market housing, developed a wide range and choice of housing and ensured that all residents have access to a good quality home in the right locations'

Response:

The comments made in support are noted.

Action:

No amendment required.

3343 Support

Summary of Representations:

The Vision of the Caerphilly 2RLDP needs to accord with Policy 33 of Future Wales 2040 National Development Framework Plan which designates the valleys and associated authorities (including Caerphilly) as a National Growth Area and a priority area for development. It also needs to contribute to delivery of enhanced economic and social outcomes as sought by the CCR.

Response:

It is considered that the vision, as presently drafted, conforms with Future Wales and this is supported by the Welsh Government representation confirming that the plan is in general conformity with Future Wales. The implications of the National Growth Area are implicitly recognised and understood and the strategy reflects this.

Action:

No amendment required.

3597 Comment**Summary of Representations:**

Suggestion: Make various changes to the Vision.

Response:

It is considered that the vision, as written, is sufficiently aspirational and comprehensive in nature given the role of the 2RLDP as a land-use document, and the reference to 'well-being' implicitly covers health. While laudible, some of the suggested amendments regarding health go beyond what a land-use document can hope to achieve. It is not considered that the suggested changes to the Vision would make it easier to understand.

Action:

No amendment required.

3728 Object**Summary of Representations:**

Vision is generally supported. Further support given re. enhancement of recreation, leisure and business opportunities.

Response:

The comments made in support are noted.

Action:

No amendment required.

3865 Support**Summary of Representations:**

Generally supported. Further support given re. the need to develop a range and choice of housing.

Response:

The comments made in support are noted.

Action:

No amendment required.

3868 Support

The Vision for the 2RLDP

Summary of Representations:

A number of towns in Caerphilly are part of the conservation strategy, yet CCBC has not utilised the funding for villages to have these plans updated or used. Until this is in place, how can CCBC enhance our towns and villages?

And with CCBC threatening to close all of our recreational, wellbeing and education buildings, how will people manage to attend to improve their health and wellbeing? Not everyone drives, public transport is unreliable and our geography doesn't allow cycling and walking

Response:

Decisions taken on public funding under the aegis of the Conservation Strategy are not a matter for the 2RLDP.

While detailed policies and site allocations will be a matter for the Deposit plan, it is reasonable to expect the plan, in an implicit manner, to have a positive impact on health and wellbeing in the round, due to the consideration of a variety of factors including (but not limited to) active travel, formal and informal green space and the protection of community facilities from alternative uses.

Action:

No amendment required.

2025 Comment

Summary of Representations:

The current strategy of CCBC appears at odds to the aims of the plan.

Reducing local facilities such as libraries and leisure centres, and reducing bus services, yet wishing to provide better access locally recognising that many areas of the county have high levels of social deprivation.

The commitment to active travel appears to be a paper exercise. The plan has been in place for many years, yet very little of it has been implemented.

Response:

While detailed policies and site allocations will be a matter for the Deposit plan, it is reasonable to expect the plan to have a positive impact on health and wellbeing in the round, due to the consideration of a variety of factors including (but not limited to) active travel, formal and informal green space and the protection of community facilities from alternative uses.

The Council intends to make cycling safer and easier for people. It has updated its Integrated Network Map (INM) and created an Active Travel Network Map (ATNM) that shows existing walking and cycling routes and proposed improvements and new routes. The Welsh Government has approved the ATNM.

Action:

No amendment required.

2364 Comment**Summary of Representations:**

The section 'based on greener attitudes' is not strong enough in the face of climate and nature emergencies. Need to incorporate the Future Wales outcome of decarbonised and climate resilient places.

The attitudes section should seek to reduce car journeys through the increased use of public transport.

The current text does not refer to 'modal shift'. This should be reinstated. Emissions from travel are a major contributor to climate and change is urgently needed.

Response:

The 'greener attitudes' section is clear, reasonable and realistic.

The 2RLDP should not repeat the content of national policy or Future Wales. The Deposit 2RLDP, with its allocations and detailed policies, will be in 'general conformity' with national policy.

National policy promotes the use of low- and no-emission private motor vehicles and seeks to reduce the need to travel. It is not considered that the strategy itself, nor any aims or objectives thereof when considered as a whole, would serve to counteract to this approach

The 'greener attitudes' section explicitly mentions 'sustainable public transport' and the 'active travel network'. The plan specifically references 'modal shift' at issue EN1, paragraphs 7.3 and 7.26 and policy PS15, as well as the modal shift policy PS14.

Action:

No amendment required.

3064 Object

Summary of Representations:

Supportive of overall vision but notes that the Council should be targeting sustained growth more in line with medium- term trends and levels achieved during the 1990s/2000s. It is only at these levels that the housing crisis can properly be addressed in line with the issues identified at the outset of the RPS.

Response:

The 2RLDP adopts the growth levels set out in the Revised Scenario J: CCR Working Age population Growth scenario. The 2RLDP will plan for an increase in population of approximately 11,603 people, with an increase in the economic population of around 3,005 people. The current evidence does not support more ambitious growth plans.

The level of housing growth in the plan was identified through the consideration of a wide range of issues and growth options and has been developed as part of engagement process. The evidence and considerations associated with this are set out in detail in Evidence Base Document EB4 - Population and Housing Growth Options. This includes the County Borough's position within the Cardiff, Newport and the Valleys National Growth Area as set out within Future Wales, as well as the implications of the Cardiff Capital Region's aspirations for job creation and economic growth.

Action:

No amendment required.

3222 Comment

Summary of Representations:

Lidl supports the 2RLDP vision to address the housing crisis by providing affordable and market housing. The redevelopment opportunity for the existing Lidl site within Risca Town Centre is one such site that will assist in achieving the aim of the 2RLDP.

Response:

The comments made in support are noted.

Action:

No amendment required.

3273 Comment

Summary of Representations:

Support.

Response:

The comments made in support are noted.

Action:

No amendment required.

3592 Support**Summary of Representations:**

Support the Vision and Objectives of the PS, and consider that the proposed development site at Pengam Road (YM201) would be fully consistent with these and will help to realise the strategic ambitions of the PS.

Response:

The comments made in support are noted.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3605 Support**Summary of Representations:**

Support the Vision and Objectives of the PS, and consider that the proposed development site at Rudry Road (CB023) would be fully consistent with these and will help to realise the strategic ambitions of the PS.

Response:

The comments made in support are noted.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3612 Support

Summary of Representations:

Suggestion: 2nd bullet point - say 'Created, maintained and enhanced green and blue infrastructure...'

'Greener attitudes': include increased energy efficiency in buildings, reducing use of natural resources, and promoting a circular economy in construction.

Response:

CCBC will make the suggested change to the 2nd bullet point of the Vision.

The suggested additions to 'greener attitudes' may not sit comfortably in a land-use document. The first is more relevant to building regulations, the second is more like an outcome than an attitude, and the third would be difficult to measure.

Action:

Change the second bullet point of the Vision to read as follows:

Created, maintained and enhanced the blue and green infrastructure across the County Borough by incorporating it into the design of development and promoting the protection and enhancement of important areas for both nature conservation and the health and well-being of residents.

3794 Comment

The Key Aims and Objectives

Summary of Representations:

Aims should be more akin to the Welsh Govt well-being goals.

Response:

The 2RLDP should not repeat the content of national policy documents. The policies and proposals set out within the 2RLDP will adhere to national policy, which itself exists within the context of the well-being goals, and be in general conformity with Future Wales.

Action:

No amendment required.

2338 Object

Summary of Representations:

The population forecast will undermine the ability to achieve the aims. The respondent claims the County Borough is overpopulated, yet it would not be possible to attract sufficient people due to high levels of out-migration.

Response:

The view put forward is contradictory. The strategy is based on a requirement to ensure an economically sustainable level of population going forward, which will enable social, economic, environmental and cultural factors to be addressed in a balanced fashion.

Action:

No amendment required.

2339 Object**Summary of Representations:**

The aims are supported with the same qualifications offered re. the vision. However, land should not be allocated for unsustainable uses such as housing.

Response:

The comments made in support are noted. The strategy is based on a requirement to ensure an economically sustainable level of population going forward, which will enable social, economic, environmental and cultural factors to be addressed in a balanced fashion. This will require the provision of an appropriate amount of land for housing development.

Action:

No amendment required.

3237 Comment**Summary of Representations:**

It is not possible to meet the objectives, and more housing will exacerbate the situation.

Response:

The strategy is based on a requirement to ensure an economically sustainable level of population going forward, which will enable social, economic, environmental and cultural factors to be addressed in a balanced fashion. This will require the provision of an appropriate amount of land for housing development.

Action:

No amendment required.

3238 Object

Summary of Representations:

The aims and objectives are supported.

Response:

The comments made in support are noted.

Action:

No amendment required.

3642 Support

Summary of Representations:

Suggests various changes to the wording of the aims and objectives, specifically: 'Contribute to improving public health by designing wellbeing into the built environment, public realm, greenspaces and infrastructure to enable people to thrive.'

Response:

The suggested changes are surplus to requirements, and go beyond what a land-use document can hope to achieve.

Action:

No amendment required.

3729 Object

Summary of Representations:

Create an objective about the 'food environment'. Objectives 5, 11 and 15 also contribute to health (aim O). Objective 21 should include 'health infrastructure'.

Objective 25 should ensure that 'greenspace is safe, inclusive, and equitable'.

Response:

The 2RLDP may have an indirect and limited effect on the 'food environment', but an additional objective on this issue is not required.

Observations about objectives 5, 11 and 15 are noted.

Objective 21: The term 'community facilities' covers doctors' surgeries, health centres, and other health infrastructure.

Objective 25: The current wording is clear and realistic.

Action:

No amendment required.

3730 Object

The Key Aims

Summary of Representations:

Welcomes the mention at para 4.4. Key Aims (aim N, specifically).

Response:

The comments made in support are noted.

Action:

No amendment required.

2531 Comment

Summary of Representations:

Support for retail development on former Stagecoach Depot, Penmaen Industrial Estate.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3159 Comment

Summary of Representations:

- CCBC must have a realistic transport strategy.
- CCBC must recognise that some people will find it difficult to stop using private motor vehicles.

- Not everybody can walk or cycle with ease or rely on bus services.
- The county borough is hilly and gets a lot of rain. These things tend to discourage walking and cycling.

Response:

Observations noted. CCBC understands the points made.

Action:

No amendment required.

3189 Comment

Summary of Representations:

General support but that allocation of new development should be made in accordance with ‘the role and function of settlements in line with the settlement hierarchy’; a sentiment which Lichfields support.

Response:

The comments made in support are noted.

Action:

No amendment required.

3223 Support

Summary of Representations:

Include new Aim P about the supply of raw materials.

Response:

Policy PS21 covers this topic.

Action:

No amendment required.

3301 Object

The Key Aims

Summary of Representations:

The HBF in particular supports point I and the fact it recognises the need for both affordable and market housing.

Response:

The comments made in support are noted.

Action:

No amendment required.

3342 Support**Summary of Representations:**

Suggestion: Make 2RLDP's terminology consistent with that found in national policy. Specifically, replace 'protecting and enhancing' with 'maintaining and enhancing'.

Response:

CCBC accepts the suggestion.

Action:

Replace 'protecting and enhancing' with 'maintaining and enhancing' throughout the document.

3795 Comment

The Key Objectives

Summary of Representations:

Support for Key Objectives 12 and 13.

Response:

The comments made in support are noted.

Action:

No amendment required.

2320 Support**Summary of Representations:**

General support but that allocation of new development should be made in accordance with 'the role and function of settlements in line with the settlement hierarchy'; a sentiment which Lichfields support.

Response:

The comments made in support are noted. Comments made about new development being made in accordance with 'the role and function of settlements in line with the settlement hierarchy' are also noted.

Action:

No amendment required.

3225 Support**Summary of Representations:**

HBF supports points 1 and 10.

Response:

The comments made in support are noted.

Action:

No amendment required.

3341 Support**Summary of Representations:**

Support the Vision and Objectives of the PS.

- consider site at Pengam Road would be fully consistent with these and will help to realise strategic ambitions of the PS.

Response:

The comments made in support are noted.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3606 Support**Summary of Representations:**

Support the Vision and Objectives of the PS.

Consider proposed development site at Rudry Road (CB023) would be fully consistent with these and will help to realise the strategic ambitions of the PS.

Response:

The comments made in support are noted.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3613 Support**Summary of Representations:**

The 2RLDP does not make reference to the protection of open spaces or our landscapes.

Response:

Policy PS8 sets out that the Council will maintain and enhance green and blue infrastructure assets which includes green space provision, landscape and sense of place. More detailed policies will be included as part of the Deposit plan.

Action:

No amendment required.

2047 Object**Summary of Representations:**

The 2RLDP does not set out provision to encourage the use of previously developed brownfield land.

Response:

While the allocation of sites will be a matter for the Deposit plan, it will adhere to national policy with respect to the identification of previously developed land.

The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Greenfield development is essential to deliver the overall requirements of the plan.

Action:

No amendment required.

2048 Object

Summary of Representations:

-Advise that Key Objective 3 makes reference to 'creating new' blue and green infrastructure as well as maintaining and enhancing.

-It may also be useful to refer to nature-based solutions in this or another relevant Key Aim.

Response:

The comments made are noted.

Action:

No amendment required.

3796 Comment

Summary of Representations:

Key Objectives 23 and 24 reinforce the value of heritage to a number of varying factors of positivity in Caerphilly.

Response:

The comments made are noted.

Action:

No amendment required.

3857 Comment

Summary of Representations:

- Support of the principles of the objectives.
- Concern over candidate sites proposed 'appearing to largely be greenfield sites'.
- Brownfield sites are not 'encouraged' by this LDP.
- How is the Council planning to encourage developments on these areas and protect green infrastructure?
- Would be useful to overlay the candidate sites map with access to services, social, employment, infrastructure and green open spaces.

Response:

The comments made in support are noted. While the allocation of sites will be a matter for the Deposit plan, it will adhere to national policy with respect to the identification of previously developed land.

The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Greenfield development is essential to deliver the overall requirements of the plan. The comments made in relation to candidate site map improvements are noted.

Action:

No amendment required.

2218 Comment**Summary of Representations:**

The retail development of former Stagecoach Depot, Penmaen Industrial Estate will: support the delivery of multiple key objectives of the 2RLDP, further support the objectives by considering SuDS principals in the design and layout of the development and maintain and enhance the County Borough's retail opportunities in sustainable locations.

Response:

The comments made in support are noted.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3161 Comment**Summary of Representations:**

CCBC must have a realistic transport strategy, must recognise that some people will find it difficult to stop using private motor vehicles as not everybody can walk or cycle with ease or rely on bus services and must remember that the county borough is hilly and gets a lot of rain, which tends to discourage walking and cycling.

Response:

The comments made are noted. Overall the Preferred Strategy seeks to maximise modal transport shift in accordance with the Wales Transport Strategy targets.

Action:

No amendment required.

3190 Comment**Summary of Representations:**

Include a new aim: 'Aim P' focused on a sustainable supply of raw materials within the Key Objectives.

Response:

The aims are intended to be relatively broad, high-level statements that, in their totality, seek to realise the vision of the 2RLDP. Consequently, they express a high degree of interrelationship but also imply the continuation of underlying, contributory processes. It is considered that the aims that refer to the delivery of housing, infrastructure and other elements of the built environment, and the associated objectives that more directly address them, imply the ongoing supply of raw materials required in order to achieve this.

Action:

No amendment required.

3302 Object**Summary of Representations:**

Section 4.5 point 12 - how us the council going to reduce water consumption by building hundred and hundreds of new homes?

Response:

Dwr Cymru is a statutory consultee with respect to plan preparation, and the Council will continue to engage with respect to the process of policy formulation and the identification of specific sites.

Action:

No amendment required.

2049 Comment**Summary of Representations:**

Section 4.5 point 24 - this is not being done, prime example Llancaich Fawr closure.

Response:

Key Objective 24 is broad in nature. The 2RLDP is a land-use document and must reflect decisions that are taken beyond its remit.

Action:

No amendment required.

2052 Object**Summary of Representations:**

CCBC will not be able to police the planning conditions placed on energy developments. Biodiversity may suffer as a result.

Response:

The Council monitors and enforces planning conditions through the planning application process, which is separate to the 2RLDP.

Action:

No amendment required.

2099 Object**Summary of Representations:**

Key Objective 13 (flood risk):

-Remove specific reference to 'highly vulnerable development' as national policy seeks to avoid all development being located in areas at risk of flooding, in the first instance, regardless of its vulnerability.

-National policy does not refer to 'areas of medium and high risk flooding'. Replace this phrase with 'areas at risk of flooding'.

Response:

The objective will be amended to incorporate the suggested changes.

Action:

Amend Key Objective 13 to read as follows:

'As far as possible, direct development away from areas at risk of flooding and embed sound SuDS principles in the design and layout of development.'

3797 Comment

Summary of Representations:

Section 4.5 point 13 - areas do not reduce impact of flooding as sites are on steep ground which will lead to potential flooding at the bottom of steep slopes.

Response:

The objection made in regard to flood concerns with sites on steep ground is noted, while the allocation of sites is a matter for the Deposit plan. The plan will adhere to national policy with respect to flood risk.

Action:

No amendment required.

2050 Object

Summary of Representations:

Section 4.5 point 15 - would be interesting if the council carried out a survey to see how many people walk or cycle to work in different areas.

Response:

The comments are noted.

The Council are working with Transport for Wales in respect of active travel data and Evidence Base Document EB3 Settlement Role, Function and Sustainability Analysis will be revised with up-to-date information.

Action:

No amendment required.

2051 Comment

Summary of Representations:

Welcomes Key Objective 23; Protect, conserve, and increase the value of the Historic Environment by promoting heritage as an asset and encouraging adaptive reuse, sustainability, placemaking and regeneration (B, N), and Key Objective 2; Manage, preserve, and enhance the quality of valuable open space/landscape and safeguard them from inappropriate forms of development (D, M). However, these aims and objectives do not reflect value of places with multiple heritage, ecological and landscape designations - to protect their special character and value. Appears to be no strategic aim/objective to resist development in designated broad Green Belt. An omission.

Response:

The comments made in regard to Key Objectives 23 and 2 are noted. The concern regarding the lack of reflection on places with multiple heritage, ecological and landscape designations are also noted, along with the concern over development on Green Belt land. Further draft heritage policies looking at the protection, preservation and enhancement of heritage assets and the protection of sites of multiple designations shall be included at deposit stage.

The designation of the green belt will be a matter for the Strategic Development Plan.

Action:

No amendment required. Further draft heritage policies will be integrated at Deposit Stage.

2535 Comment**5 Strategic Growth and Strategy Options****Summary of Representations:**

The level of development proposed is unsustainable.

The Caerphilly Basin at present is seriously over-populated, growth is not an option.

Population decrease will release land that can be used for employment stemming the out-migration of the most talented people of working age.

Response:

The hybrid strategy sets out a growth strategy that seeks to deliver a population that will contribute towards the regional economic aspirations. This reflects the County Borough's location within the National Growth Area and Future Wales Policies 1 and 33. The strategy seeks to address a declining population, that would have significant adverse impacts on the economy and the provision of services and infrastructure throughout the County Borough. The strategy promotes a level of growth that sustains the economy and services throughout the County Borough.

The representor states that the Caerphilly Basin is seriously overpopulated, but there is no evidence to support this position. Caerphilly is a Principal Settlement in the settlement hierarchy and, as such, should be a focus for development. This accords with the County Borough's role in the National Growth Area and Future Wales Policies 1 and 33.

Population decrease would result in a corresponding decrease in the economic population that would have a significant adverse impact on the economy of the County Borough, potentially leading to economic decline. A declining economy could release land for redevelopment, but a shrinking economic population would mean there would be insufficient working age people to take up the jobs.

Action:

No amendment required.

2340 Object**Summary of Representations:**

The hybrid strategy is not appropriate as Metro investment is irrelevant and will bring about minimal improvement. It would result in the transport system being uneconomic and unsustainable

Response:

The Hybrid Strategy seeks to locate development close to transport nodes where possible. This is in accordance with Policies 12 and 36 of Future Wales that seek to maximise the benefit of the investment in the Metro by locating development close to transport nodes. To date significant improvements to the rail infrastructure have taken place with the provision of new rolling stock and widescale station improvements across the network. In addition further significant improvements, including improvements to bus services, are being considered for future phases of Metro Funding. The Hybrid Strategy will seek to support this through the location of proposed development.

Increasing modal shift is part of Welsh Government's strategy for addressing the causes of and adapting to climate change and the Hybrid Strategy reflects this. The provision of new rolling stock for the Rhymney Valley line, which operate electrically throughout the County Borough, will enhance the environmental benefits of modal shift to public transport, whilst increasing the use for active travel will also support this. Increasing the use of the public transport system through the strategy will increase the viability of the public transport rather than making it uneconomic.

Action:

No amendment required

2342 Object**Summary of Representations:**

Despite the removal of the strategic site, the settlement hierarchy taken forward supports an appropriately scaled allocation at Maesycwmmmer.

Response:

The Settlement Hierarchy identifies Maesycwmmmer as a Residential Settlement Suitable for Accommodating Growth and as such an appropriately scaled site would be acceptable in principle.

Action:

No amendment required.

3644 Comment**Summary of Representations:**

Support the principle of growth.

Caerphilly forms part of the CCR and is within Future Wales' National Growth Area and growth should be suitably ambitious. Question whether Scenario H might be more appropriate due to its level of growth.

Evidence Base Document EB4 and the Annual Monitoring Reports for the LDP identify a shortfall in housing delivery since 2008. Given this should the 2RLDP not seek to address this with a higher growth scenario.

Response:

The support for growth in the County Borough is noted.

The 2018 based Welsh Government projections identified a reducing population in the County Borough for the first time. A key element within this is the corresponding reduction in economic population which could have significant adverse impacts for the economy of the County Borough. A key consideration in assessing the alternative growth scenarios for the plan was addressing the declining economic population. The CCR originally aimed to create 25,000 jobs within the region, amounting to an increase of approximately 3.75%. Option J reflects this aim and seeks to ensure that the County Borough maintains an economic population to assist in delivering this aim. This was considered to be an ambitious, deliverable and robust target for the 2RLDP and as such this was adopted as the growth scenario for the plan.

It is correct that the annual delivery of housing in the County Borough has not reached the annual housing requirement of 575 dwellings per annum. This has resulted in a shortfall of housing in respect of the Adopted LDP. However, that target relates to the Adopted LDP and the 2RLDP takes its starting point of 2018 based projections. As such the shortfall in housing delivery has been taken into account by the Welsh Government projections, reflecting the position in 2018.

Consequently, whilst there is a shortfall in terms of the Adopted LDP strategy this does not translate to the 2RLDP strategy, which is a different strategy. The level of housing directly relates to Scenario J that has been used to address issues in the population structure to deliver the economic growth expected by the Council and the CCR over the plan period. As such the Council is satisfied that Option J represents the best growth scenario for the 2RLDP.

Action:

No amendment required

3869 Comment**Summary of Representations:**

Section 5 of the Preferred Strategy confirms there are six alternative strategy options which have been considered by the Council.

Strategy Option 1: Continuation of the LDP Strategy

Support the higher housing requirement and the focus of development within the strategic areas, in particular the Northern Connections Corridor (NCC).

Strategy Option 2: Heads of the Valleys Regeneration Area Focus

Do not support Option 2 as it would be inappropriate to concentrate and maximise development within the HoV to the detriment of the wider Borough. There are considerable concerns towards the deliverability of this approach.

Strategy Option 3: Key Strategic Site

Support is given to the ability for Maesycwmmmer to allow for significant growth and provided for new housing development.

Strategy Option 4: Metro Investment Focus

The approach to sustainable transport and supporting metro investments, in particular to the Rhymney Rail Line, is understood, but concern is raised in the potential for restricting sites that are sustainably located by other means of transport. Furthermore, no indication is given to the proximity of sites to the South-East Wales Metro. It would be inappropriate that sites have to be immediately adjoining the railway lines or the stations, given there are sites which are within appropriate walking distance.

Strategy Option 5: Town Centre First

In principle, this is supported, however appropriate consideration is needed to ensure that there are still sufficient allocations within the surrounding settlements where people want to live and to provide a range and choice in the open market.

Strategy Option 6: Caerphilly Basin Focus

Do not support the approach to solely maximise development opportunities in the Southern Connections Corridor. Whilst there are benefits to the significant investment in the regeneration of Caerphilly town, it is an overly restrictive option what would be to the detriment of the wider borough.

Response:

The support for strategy option 1 and the focus of development in the northern connections corridor is noted. However, it is not practical to continue with the Adopted LDP strategy as the strategy adopts a brownfield only approach to development in the Caerphilly Basin and delivery of housing has never reached the annual requirement. This is considered in paragraphs 5.2 to 5.7 of Evidence Base Document EB1.

The comments in respect of option 2 are noted. The comments in respect of option 3 are noted.

The comments in respect of option 4 are noted. Evidence Base document EB3 sets out the assessment of settlements in terms of their suitability to accommodate growth and, as part of this assessment, the proximity to train and bus nodes are considered. It is accepted that it would be inappropriate to only include sites that are immediately adjoining transport nodes, and policy PS4 reflects that, setting out a sequential approach to the allocation of sites. This sequential approach acknowledges that development will need to be allocated outside of the Principal and Local settlements in order to deliver the level of growth identified in the strategy.

The comments in respect of option 5 are noted. Policy PS4 sets out a sequential approach to the allocation of sites acknowledging that development will need to be allocated outside of the Principal and Local settlements in order to deliver the level of growth identified in the strategy.

The comments in respect of option 6 are noted.

Action:

No amendment required.

3870 Comment**Population****Summary of Representations:**

Paragraph 7.4 of the Development Plans Manual advises that a plan should have 10 years of its plan period left when adopted. Based on the Delivery Agreement the 2RLDP will only have 7.5 years left of its plan period when it is scheduled to be adopted. The plan period should be extended by a further 3 years to ensure the 10-year period on adoption.

Response:

Paragraph 7.4 of the Development Plans Manual (Edition 3) advises that a plan should have 10 years of its plan period left when it is adopted. It is acknowledged

that the Revised Delivery Agreement identifies the adoption of the plan in 2027, which is less than 10 years to the end of the plan period.

The options for progressing the plan preparation process, following the receipt of conformity objections, were set out in the Report to Full Council on 4 July 2023 (paragraphs 5.7 to 5.13 refer). The fundamental concern for considering how to progress was whether the proposed action would result in a significant change to the strategy that would require that the plan process be restarted from the beginning, significantly delaying the time till the adoption of the plan.

Changing the plan period would result in the Council having to revisit its evidence base including the underlying population and household projections and the assessment of strategy and growth options, major which are major parts of the preparation process for a plan prior to the Pre-Deposit Consultation. In essence this would require the Council to go back to the beginning of the plan making process.

In discussions with Welsh Government it was agreed that the deletion of the Strategic Site at Maesycwmmer would not be a change to the strategy that would be of such significance to warrant restarting the whole plan preparation process, although the plan would need to be the subject of a further Pre-Deposit Consultation. Whilst it was acknowledged that this option did not have the 10-years post adoption advised by the Development Plan Manual, the current position of the Adopted LDP outside of its plan period and the need to deliver development and regeneration in the County Borough outweighed this advice. Welsh Government officers confirmed that this was their preferred option for moving forward with the plan.

On 24 July 2024 the Council agreed with Welsh Government and resolved to continue preparation of the 2RLDP commencing with a Pre-Deposit Consultation on the Revised Strategy.

Action:

No amendment required.

4063 Object

Key issues in considering the Population and Housing Projections

Summary of Representations:

HBF supports the importance placed on the fact that Caerphilly County Borough is located within the Cardiff Capital Region and one of the National Growth Areas identified in Future Wales. We consider this is a very relevant consideration and if not followed would risk the plan not being in accord with National Policy.

Response:

The comments made in support are noted.

Action:

No amendment required.

3340 Support**Summary of Representations:**

If there is only any increase of 1800 people why are there so many developments considered?

Response:

The level of housing growth in the plan was identified through the consideration of a wide range of issues and growth options and has been developed as part of engagement process. The evidence and considerations associated with this are set out in detail in Evidence Base Document EB4 - Population and Housing Growth Options. This includes the County Borough's position within the Cardiff, Newport and the Valleys National Growth Area as set out within Future Wales, as well as the implications of the Cardiff Capital Region's aspirations for job creation and economic growth.

Action:

No amendment required.

2053 Object**Economic Requirements****Summary of Representations:**

We cannot rely on large industry or manufacturing. Mixed style industrial units linked to renewable energy opportunities in the borough - hydro, mine water heat on brownfield sites - which could be identified on a map of the borough overlaid with priority areas (WIMD) can help ensure developments take place in the right area. Jobs closer to home will help address some of the socio economic opportunities in the area. With the dualling of the HOV road this does open up more opportunities to the North of the borough - where the need is higher.

Response:

Land will be allocated in sustainable locations for a range of class B development - sufficient for the continuation of an economically active population within the County Borough going forward, and in order to provide for the needs of the local economy.

The approach taken with regard to renewable energy will be in accordance with Future Wales and national policy.

Action:

No amendment required.

2219 Support**Policy PS1: The Level of Growth for the 2RLDP****Summary of Representations:**

Support the selection of Growth Option J.

Response:

The support for Option J as the basis for the Revised Preferred Strategy is welcomed.

Action:

No amendment required.

3848 Comment**3198 Comment****Summary of Representations:**

The proposed level of growth does not reflect the ambitious vision of the plan set out in paragraphs 4.1 to 4.5 of the RPS or Policy 3 of Future Wales which defines the County Borough as part of the National Growth Area.

The scale of the delivery of homes required to assist in 'addressing the housing crisis' needs to be increased. The plan only reflects past delivery rates between 2001-2015 when Housing delivery between 2010-2020 hit historic lows due to chronic land supply shortages evidence base document EB4 demonstrates that when housing land is available, building rates do increase and delivery well above the level proposed in the plan is achievable. This reflects the ambitions set out for the growth area in Future Wales or by the CCR.

The low level of house building over the past fifteen years since 2010 will also have had an impact on Welsh Government population and household projections, which are trend based and if used to inform future growth they will just perpetuate the previous under delivery of homes.

Of the 4 growth options considered for the Plan, only two can be considered growth options and the preferred option (J) is only just above past build rates, so is not really growth. Options A and I are not growth options.

The interpretation of Future Wales and the Council's own preferred LDP Vision is that the Caerphilly County Borough will deliver levels of growth above those experienced over the past 15 years. The Vision as Lichfields understands it is to

deliver improved economic and social outcomes and not simply roll forward recent past trends.

Option J growth of 450 dwellings per annum is below the average housing delivery between 2001-2015 (460 dpa). The extent to which Option J really delivers growth above past longer-term trends or will deliver improved economic and social outcomes for the County Borough is questioned. The approach offering 11 growth options, ten of which fail to deliver housing growth above past medium-term trends (2001-2015) is deeply flawed and inconsistent with Future Wales. Several additional growth-led scenarios should have been assessed when formulating policy PS1.

Response:

The Representors assertion that growth is considered over and above what past trends has delivered is incorrect. Growth, in development plan terms is not an exponential increase in housing, which the assertion implies. Growth is an increase in population, housing and jobs over and above the current position, i.e. the start of the plan period. Having lower growth rates does not mean that there is not growth, it just means that the level of growth is less. Consequently, the representor's assertion is not accepted.

The representor states that 11 options were used for the LDP. However, 12 options were used, with the inclusion of Option K (Employment Led - Oxford Economics Employment Forecast). In terms of the options considered for the 2RLDP, four options were chosen for consideration. These options were:

Option A (WG 2018-based Principal Projection), Option H (Continuation of adopted LDP)

Option I (Long term housebuilding rates), and Option J (CCR Growth in Working age population).

The consideration of these Options and the reasoning for the selection of Option J for the 2RLDP is set out in evidence base document EB4: Population and Housing Growth Options.

The representor asserts that only 1 of the options considered represents growth against past building rates. Again, this is not accepted. It is agreed that Option A does not identify growth but, as set out in Evidence Base document EB4, the Welsh Government projection is the starting point for the process and, consequently, should be considered in the process (paragraph 9.12 refers) This is also set out in paragraph 4.2.6 of Planning Policy Wales Edition 12. Both Option I and the preferred Option J identify increases in population, households and jobs, albeit to different levels while Option H identifies the highest level of growth and is over the long-term trends. As such the 4 options considered for the plan are legitimate options, with three representing different levels of growth and Option A being the starting point for the process. The 3 growth options considered represented 3 different levels of growth relating to past trends, the CCR economic growth and the Adopted LDP. The latter option set out a dwelling requirement that has not been delivered since over a

17-year period (since 2008), longer than the plan period for the 2RLDP. Whilst the representor argues that higher build rates can be achieved with the release of land, there is little evidence to support this. With the current economic climate and the increased requirements that development now needs to accommodate, there is little confidence that very high levels of growth can be achieved. Therefore, it is considered inappropriate to consider further options that would identify unrealistic levels of growth.

Action:

No amendment required.

3226 Comment

Summary of Representations:

Option J is not supported as it does not adequately recognise or address the inherited deficiencies and the principle of balanced planning, which I based upon natural population changes, not deliberately, artificially and unsustainably increasing it.

Caerphilly is densely populated with the population not naturally increasing. A reducing, or static, population would benefit existing residents. By allowing scope to give the residents the amenities of job opportunities of which they have been deprived in the past.

Response:

Option J provides a growth scenario that provides a balance between the increase in population, housing requirement and jobs growth for the County Borough. As such it is a balanced approach to planning for the future of the County Borough. The representor asserts that balanced planning is based upon natural population change, which is currently identifying population decline for the first time. However, population change is not just based on natural change, it is also influenced by migration and as such the representor's assertion is incorrect.

Whilst Caerphilly is seeing a negative natural change, it is currently being offset by in-migration which sees a very small increase in population. If in-migration were to be stopped and the negative natural change allowed to carry on this would result in a reduction of overall population, and more importantly, a significant decrease in economic population and the number of children. The loss of economic population would reduce the economic base of the County Borough potentially resulting in economic decline. This position would not create jobs, rather jobs would be lost due to the loss of economic activity. The reduction in the number of children would raise very significant issues in the provision of education facilities in the future. Both of these scenarios are not acceptable to the Council. Therefore, the Council has agreed a growth strategy that delivers economic growth and increases both the economic population and the numbers of children.

Action:

No amendment required.

3240 Object**Summary of Representations:**

The HBF supports the Council choosing the highest growth option of the four options considered, due the Council being located within the City Region and National Growth Area.

Response:

The support is welcomed, although it is advised that the growth option for the plan is the second highest growth option behind Option H: Continuation of the LDP.

Action:

No amendment required.

3339 Support**Summary of Representations:**

Support the principle of the level of growth for the County Borough which is in line with CCR aspirations and Future Wales policies.

Question whether Scenario H: Continuation of the Adopted LDP might be more appropriate as it allows for a higher total dwellings requirement that is better suited to reflect the importance of CCBC within the National Growth Area and the CCR.

Evidence Base Document EB4 and the Annual Monitoring Reports for the LDP identify a shortfall in housing delivery since 2008. Given this should the 2RLDP not seek to address this with a higher growth scenario.

Response:

The support for growth in the County Borough is noted.

The 2018 based Welsh Government projections identified a reducing population in the County Borough for the first time. A key element within this the corresponding reduction in economic population which could have significant adverse impacts for the economy of the County Borough. A key consideration in assessing the alternative growth scenarios for the plan was addressing the declining economic population. The CCR originally aimed to create 25,000 jobs within the region, amounting to an increase of approximately 3.75%. Option J reflects this aim and seeks to ensure that the County Borough maintains an economic population to assist in delivering this aim. This was considered to be an ambitious, deliverable and robust target for the 2RLDP and as such this was adopted as the growth scenario for the plan.

It is correct that the annual delivery of housing in the County Borough has not reached the annual housing requirement of 575 dwellings per annum. This has resulted in a shortfall of housing in respect of the Adopted LDP. Scenario J has been used to address issues in the population structure to deliver the economic growth expected by the Council and the CCR over the plan period. As such the Council is satisfied that Option J represents the best growth scenario for the 2RLDP.

Action:

No amendment required.

3593 Comment

Summary of Representations:

The plan is seeking an overprovision of housing with too much development on greenfield land. There will be a significant overprovision of housing in this LDP, reducing the likelihood that brownfield sites identified will be prioritised for development, a problem encountered in the last LDP with numerous brownfield sites left undeveloped while greenspaces have been lost.

Concerned that the plan doesn't go far enough to protect precious green spaces, with significant proportions of the planned developments proposed on green field or biodiverse 'scrubland'.

While the key objectives state that the plan will look to prioritise and utilise brownfield land before greenfield land, there are very few brownfield sites identified for development across the borough. I urge CCBC to work closely with WG to find solutions to remedying brownfield land for development so that we can protect our much-valued greenfield sites.

Response:

The 2RLDP identifies a level of housing provision that is consistent with its aim of maintaining an economic population to assist in the delivery of the economic growth aspirations for the Cardiff Capital Region. Caerphilly County Borough is identified within the Cardiff, Newport and the Valleys National Growth Area identified by Future Wales. The National Growth Area is "the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure". As such it is expected that the County Borough will accommodate an appropriate level of growth for this designation. The level of housing provision set out in the plan reflects this position.

It should be noted that the Revised Preferred Strategy does not allocate any sites for any particular uses, rather it sets the overarching policy framework within which the detailed policies and allocations will be prepared. Whilst it does set an overall requirement for housing and other landuses, no decisions on where these requirements will be delivered.

Planning Policy Wales Edition 12 is clear that previously developed land should be utilised in preference to greenfield (paragraph 3.55). However, it also states that not all such sites will be suitable for redevelopment due to contamination, unsustainable locations or the potential for constraints to be imposed upon existing, adjacent activities. In addition to this the plan can only identify sites where it can be demonstrated that the proposed development is financially viable and can be delivered during the plan period. Unfortunately, the development costs for brownfield sites can be significantly higher and this makes much of the brownfield land in the County Borough unviable for development. So, whilst the plan will seek to identify brownfield land first, the plan will also need to identify greenfield land releases as well.

The representor asserts that the Adopted LDP has not developed brownfield sites and allowed greenfield sites to be developed. Whilst it is true that some of the Adopted LDP sites that have been developed were greenfield, it is also the case that the plan was very successful in developing brownfield sites, particularly in Caerphilly where the strategy sought a brownfield approach to development, which has been largely successful resulting in very few developable brownfield sites remaining in the Caerphilly basin.

The plan will also seek to protect the valuable green spaces throughout the County Borough as part of its overall policy approach.

Action:

No amendment required.

3631 Object

Summary of Representations:

Noting the County is within a National Growth Zone, as defined in Future Wales, this level of growth and spatial strategy appears reasonable to us.

Response:

The support for the level of growth is welcomed.

Action:

No amendment required.

3783 Comment

Summary of Representations:

Moving forward to Deposit, further work would be beneficial to understand how the Revised Preferred Strategy has been developed within the wider regional context as Future Wales brings a new perspective that all LDPs have to embrace on how each plan sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships in advance of the formal commencement of an SDP.

Response:

The comments from Welsh Government are noted.

The Council will continue to work with the authorities in the region to build on the evidence provided evidence Base document EB21: Regional Assessment of Future Growth and Migration for the Cardiff Capital Region as it moves forward to Deposit. This work will demonstrate how the 2RLDP strategy has been developed within a wider regional context and how its spatial strategy relates to the rest of the region.

Action:

No amendment required.

3764 Comment**Summary of Representations:**

The Welsh Government does not object in principle to the scale of housing growth.

Response:

The support for the scale of the growth proposed in the 2RLDP is welcomed.

Action:

No amendment required.

3765 Comment**Summary of Representations:**

It will be essential to demonstrate how the targeted increase in population/jobs can be achieved in a way which is compatible and consistent with the LDP strategies of the other LPAs in the CCR. It would be beneficial to provide information on the number of jobs created in the County Borough since the City Deal was agreed and what proportion of additional jobs can be attributed to it.

Response:

The Council will continue to work with the authorities in the region to build on the evidence provided evidence Base document EB21: Regional Assessment of Future Growth and Migration for the Cardiff Capital Region as it moves forward to Deposit. This work will demonstrate how the 2RLDP strategy has been developed within a wider regional context and how its spatial strategy relates to the rest of the region. It will also consider how the aspirations for jobs growth are compatible and consistent with the other strategies in the region.

Action:

No amendment required.

Summary of Representations:

A re-apportioned housing supply should be pursued to ensure the delivery of much needed housing in the Plan period to meet unmet need in the current LDP.

Response:

Supporting evidence papers EB5 Housing Land Supply and Affordable Housing Target and EB5.1 Housing Land Supply and Affordable Housing Target (Addendum) assess the components of housing supply, including the assumptions for windfall sites and provide justifications for the assumptions used.

The DPM (Table 18) states that “a ‘non-delivery allowance’ is factored into the land bank; discounting a proportion of the land bank based on local evidence. This may not be appropriate for all LPAs, but relevant for LPAs with a large number of land bank sites, not those with just a few sites, or in areas where the land bank is made up of numerous small sites which take a long time to complete. To be clear, a land bank non-delivery allowance is separate to the flexibility allowance (i.e. 10%) which is applied to the plan as a whole.”

The non-delivery rate has ranged between 20-50% in other areas in Wales, depending on local circumstances.

Sites with extant planning permission are taken into account when arriving at the housing land requirement. However, in calculating the components of housing supply, only sites with planning permission that are considered to be realistically likely to come forward during the plan period have been considered. These sites have been considered in consultation with the Housing Stakeholder Group which comprises representatives from the housebuilding industry.

The original calculation includes a non-delivery allowance of 25% which is within the range identified in the DPM. However, the Council will recalculate the Components of Housing Supply to reflect the latest available data, and ensure an appropriate non-delivery allowance is factored into the land bank, as part of the evidence base for the Deposit plan.

Action:

No amendment required.

Review the Components of Housing Supply to reflect latest available data. Review the land bank sites with the housing stakeholder group.

Consider an appropriate non-delivery rate for the Deposit plan.

3485 Object

3494 Object

3498 Object

3503 Object

3510 Object

3608 Object

3615 Object

Summary of Representations:

Supports the overall 2RLDP vision to facilitate an increased number of jobs, sustaining economic growth, and creating vibrant town centres with diverse uses. The proposal for a replacement modernised store to serve Risca is one such site that will assist in addressing the economic challenges facing the area.

Response:

The comments made in support are noted.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3601 Support

Summary of Representations:

Estimate additional 1500 houses may be required in the period of the new LDP and this required development can be accommodated on windfall or brownfield sites.

Why are so many Greenfield sites contained in the new LDP. This appears unnecessary and non-compliant with legislation.

Response:

The level of housing growth in the plan was identified through the consideration of a wide range of issues and growth options and has been developed as part of engagement process. The evidence and considerations associated with this are set out in detail in EB4 - Population and Housing Growth Options. This includes the County Borough's position within the Cardiff, Newport and the Valleys National

Growth Area as set out within Future Wales, as well as the implications of the CCR's aspirations for job creation and economic growth.

EB5.1 Addendum to Housing Land Supply and Affordable Housing Target (January 2025) identifies that the 2RLDP has an existing housing land supply, including windfall sites, of a little over 4,600 dwelling units, meaning that the Preferred Strategy needed to identify a land requirement for a little over 3,000 units. Very few of the submitted candidate sites are brownfield, and where these are considered suitable for further consideration, they would not meet the overall requirement.

While PPW is clear that previously developed land should be utilised in preference to greenfield (paragraph 3.55), it also states that not all such sites will be suitable for redevelopment due to contamination, its unsustainable location or the potential for constraints to be imposed upon existing, adjacent activities. The Adopted LDP has been largely successful in terms of bringing forward redevelopment of brownfield land, and those sites that remain fall into this category. Sites proposed for inclusion within the 2RLDP will be assessed in terms of deliverability and viability, which are important considerations in the site selection process and these considerations are factored into candidate site assessments.

The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Consequently, a proportion of greenfield release is required.

Action:

No amendment required.

3404 Object

Summary of Representations:

Paragraph 7.4 of the Development Plans Manual advises that a plan should have 10 years of its plan period left when adopted. Based on the Delivery Agreement the 2RLDP will only have 7.5 years left of its plan period when it is scheduled to be adopted. The plan period should be extended by a further 3 years to ensure the 10-year period on adoption.

Response:

Paragraph 7.4 of the Development Plans Manual (Edition 3) advises that a plan should have 10 years of its plan period left when it is adopted. It is acknowledged that the Revised Delivery Agreement identifies the adoption of the plan in 2027, which is less than 10 years to the end of the plan period.

The options for progressing the plan preparation process, following the receipt of conformity objections, were set out in the Report to Council on 4 July 2023 (paragraphs 5.7 to 5.13 refer). The fundamental concern for considering how to progress was whether the proposed course of action would result in a significant

change to the strategy that would require that the plan process be restarted from the beginning, significantly delaying the time till the adoption of the plan.

Changing the plan period would result in the Council having to revisit its evidence base including the underlying population and household projections and the assessment of strategy and growth options, which are major parts of the preparation process for a plan prior to the Pre-Deposit Consultation. In essence this would require the Council to go back to the beginning of the plan making process.

In discussions with Welsh Government it was agreed that the deletion of the Strategic Site at Maesycwmmer would not be a change to the strategy that would be of such significance to warrant restarting the whole plan preparation process, although the plan would need to be the subject of a further Pre-Deposit Consultation. Whilst it was acknowledged that this option did not have the 10-years post adoption advised by the Development Plan Manual, the current position of the Adopted LDP outside of its plan period and the need to deliver development and regeneration in the County Borough outweighed this advice. Welsh Government officers confirmed that this was their preferred option for moving forward with the plan.

On 24 July 2024 the Council agreed with Welsh Government and resolved to continue preparation of the 2RLDP commencing with a Pre-Deposit Consultation on the Revised Strategy.

Action:

No amendment required.

4065 Object

Strategy Options

Summary of Representations:

Why is Caerphilly Basin a specifically mentioned area, when the borough is made up of incredible communities which never get mentioned?

Response:

Future Wales makes Caerphilly town part of a National Growth Area (see FW policy 33) and says that the town will be a 'strategically important location on the South East Metro system'. It makes sense to pay special attention to Caerphilly and its 'basin' in a strategic land-use document.

The Heads of the Valleys Regeneration Area (HOVRA) was the subject of Strategy Option 2 (HOVRA Focus), but it does not figure in the Revised Preferred Strategy (policy PS2). Like other parts of the County Borough, however, it will play a role in the area's ongoing growth and development.

Action:

No amendment required.

2026 Comment

Summary of Representations:

Due to the excessive spending in Caerphilly basin, tourism, improvements to town and links to Cardiff, not to mention its multi-million-pound leisure centre facilities. This is where you should be maximizing your house building. The rest of the county is poorly serviced with amenities and leisure facilities being reduced. Blackwood also has no rail network.

Response:

Even though the 'Caerphilly Basin Focus' option does not figure in the 2RLDP's Revised Preferred Strategy, the Caerphilly Basin will be suitable for appropriately scaled and located development. Future Wales places the town of Caerphilly in a National Growth Area (see FW policy 33) and says that it will be a 'strategically important location on the South East Metro system'.

Action:

No amendment required.

3151 Object

Policy PS2: The Revised Preferred Strategy for the 2RLDP

Summary of Representations:

Town centres are saturated and lack infrastructure to meet placemaking principles, such as green space, recreation and leisure facilities traffic congestion and poor sewerage facilities.

Response:

In preparing the 2RLDP and identifying its allocations the plan will identify infrastructure that will be necessary to be provided to ensure development can be delivered appropriately and sustainably. The Council will work with infrastructure providers and statutory undertakers to ensure that the proposed development in the plan is appropriately serviced.

Action:

No amendment required.

2220 Comment

Summary of Representations:

Objection to development of greenfield land as they are highly valued and contain important wildlife.

Response:

Brownfield land contains some of the most important and diverse habitats that we have in the County Borough. Conversely a significant amount of the greenfield land surrounding our settlements is comprised of improved agricultural grassland which has little if any importance for nature conservation or biodiversity, with the exception of field boundaries, where they are comprised of stone walls or hedgerows (and these can be maintained and enhanced as part of development proposals). To assume a general presumption against development on greenfield land would, therefore, lead to the loss of some of the most important and diverse brownfield habitats and preserve greenfield sites with much less importance for biodiversity. This position does not deliver sustainable development.

In addition, in considering sites for allocation for development in the plan, the Council will look to utilise brownfield land before greenfield land. However, in order to allocate a site, the Council must be able to demonstrate that the proposed development is financially viable and can be delivered during the plan period. The costs of remediating brownfield land for development means that developing such land is often unviable and consequently the plan cannot identify it. There is a limited amount of brownfield land that can be allocated in the plan and, therefore, greenfield land will also need to be identified in order to deliver development to meet the needs of the County Borough. The plan will seek to identify only the most appropriate sites for development, whilst protecting areas of land with significant ecological and environmental value.

Action:

No amendment required.

2970 Object

Policy PS2: The Revised Preferred Strategy for the 2RLDP

Summary of Representations:

The retail development of former Stagecoach Depot, Penmaen Industrial Estate will help to achieve the strategic visions of the 2RLDP through the implementation of placemaking principles and increasing the number of jobs in a sustainable location.

Response:

This representation relates to a specific site and its future use. The plan is currently at Pre-Deposit stage and as such does not address specific sites, or their uses and as such this is not a comment on either the policies or the content of the pre-Deposit plan. This site has been submitted as a Candidate Site (GB204 refers) and these issues will be considered as part of its assessment.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3162 Comment**Summary of Representations:**

Option 6 should be included in the hybrid approach, and an element of development should be directed towards Caerphilly Basin.

Options 4 and 5, that comprise the main elements of the hybrid strategy, should reasonably be incorporated in any strategy, with Option 5 being required by the need to prioritise brownfield land and Option 4 being required by the PPW search sequence. In not including Option 6 as part of the strategy it follows that a substantial proportion of new housing is to be directed towards the Northern Connections Corridor.

Response:

It is acknowledged that the two elements of the hybrid strategy could be subsumed, to varying degrees, under other planning requirements. However, the hybrid strategy sets out the 2 elements to relate directly to Future Wales policy at the Caerphilly level. The intention of the hybrid strategy is to focus development as far as possible to the main settlements in the County Borough (the 5 principal and 4 Local settlements in the hierarchy) rather than focussing on any specific area of the County Borough.

Strategy option 6: Caerphilly Basin Focus would seek to focus a significant majority of development to the Caerphilly Basin, at the expense of development in the other main settlements. Whilst this would maximise the benefits of the regeneration work that is being undertaken in Caerphilly, it would not support the regeneration work that is also being undertaken in the other settlements, notably Blackwood and Bargoed. The hybrid strategy as it stands affords for a more even distribution of development throughout the County Borough that would have a wider positive impact than if it were restricted to the Caerphilly Basin.

It is fair to say that, as a result of the hybrid strategy, the mid valleys corridor will accommodate a proportion of the proposed growth identified in the plan, although the exact distribution of growth will be considered as part of the preparation of the Deposit stage of the plan.

Action:

No amendment required.

3199 Object

Summary of Representations:

Option 6 should be included in the hybrid approach, and an element of development should be directed towards Caerphilly Basin.

The strategy for the plan is unsound due to it not directing new housing towards the Caerphilly Basin and fails to respond to the sustainable locational analysis that is part of the evidence base as it identifies Caerphilly at the same level as other, far less sustainable settlements.

Response:

The representor's contention that the failure to include strategy option 6 in the hybrid strategy makes the strategy unsound is not accepted. The intention of the hybrid strategy is to focus development, as far as possible, to the main settlements in the County Borough (the 5 principal and 4 Local settlements in the hierarchy) rather than focussing on any specific area of the County Borough.

Strategy Option 6 would seek to focus the majority of development on the Caerphilly Basin, which is counter to the Hybrid strategy. As such Option 6 is not compatible with the Hybrid Strategy and should not be included.

The representor's contention that the plan is unsound as it does not direct new housing towards the Caerphilly Basin is also not accepted. The strategy seeks to focus all development, not just housing, to the main settlements and Metro nodes. Caerphilly is included in the Hybrid Strategy both as a Principal settlement and a transport node, so is a focus for development, albeit not the sole focus which would be the case under Option 6. The representor also contends that the strategy does not reflect the sustainable locational analysis as it identifies Caerphilly as one of five Principal settlements. The 5 Principal settlements all have strengths and weaknesses in terms of their sustainability and as such it is incorrect to assert that one is a better location than another. For example, Blackwood is better located than Caerphilly in terms of employment opportunities due to its proximity to the County Borough's main employment centre at Oakdale/Penyfan. The hybrid strategy seeks to focus development to the main settlements in accordance with Future Wales policy as well as affording scope for identifying the most appropriate sites for development to be identified throughout the County Borough. As such the Hybrid Strategy affords the best option to deliver sustainable growth for the County Borough.

Welsh Government's response to the Revised Preferred Strategy does not raise any conformity issues with the plan.

Action:

No amendment required.

3850 Object

Summary of Representations:

Broadly supportive of the hybrid strategy that allows for a distribution of development through the wider County Borough reflecting access to transport focal points and higher order centres with a range of facilities.

It is noted that a significant proportion of growth will need to extend beyond the Principal and Local settlements towards residential centres with reasonable access to facilities. It is requested that Policy PS2 makes specific reference to the role of suitable residential settlements in meeting growth requirements.

Response:

The broad support for the hybrid strategy is welcomed.

Policy PS2 sets out the policy for the hybrid strategy that seeks to direct development to the principal centres and the main transport nodes in the County Borough. Paragraph 7.4 expands on the principles of the strategy identifying that development should be located “close to, or within the County Borough's Principal and Local Settlements in the first instance.” It goes on to advise that these locations cannot accommodate all of the growth proposed in the plan due to constraints and development would then be directed to other settlements that are “located in the best locations in terms of the Metro and town centre focuses” and that “Development sites outside of the Principal and Local Settlements will be targeted to the residential centres that can accommodate growth.” Policy PS3 reflects this position. It is considered that this adequately address the role of suitable residential settlements in meeting growth requirements.

Action:

No amendment required.

3227 Support**Summary of Representations:**

Supports the hybrid option chosen and consider it the most sustainable and likely to deliver the homes identified as needed.

Response:

The support is welcomed

Action:

No amendment required.

3338 Support

Summary of Representations:

Overall, the hybrid strategy to be adopted for the 2RLDP is supported, in that it represents the most appropriate and sustainable option to apportioning development and growth in the new plan.

Response:

The support is welcomed.

Action:

No amendment required.

3480 Support

3491 Support

3496 Support

3501 Support

3508 Support

Summary of Representations:

Support the proposed spatial strategy which provides a robust and balanced approach to growth and a basis by which the Vision and Objectives of the emerging LDP can be achieved.

Response:

The support for the spatial strategy is welcomed.

Action:

No amendment required.

3609 Support

3616 Support

Summary of Representations:

Support the Preferred Strategy which includes key aims to address causes, encourage mitigation and build resilience to climate change, as well as balancing sustainable development with protecting and enhancing green and blue infrastructure through good placemaking and design.

Response:

The support for the strategy is welcomed.

Action:

No amendment required.

3782 Support**Summary of Representations:**

In broad terms, the Preferred Strategy appears to have regard to the Southeast Area Statement and seeks to deliver actions identified in the themes.

Response:

The comments in respect of the strategy are noted.

Action:

No amendment required.

3784 Comment**Summary of Representations:**

It is unclear as to why Option 6, not necessarily as a focus, has been ruled out as the Council states that it is in 'strong conformity with national policy and guidance', in particular relation to the town centre focus and location to main transport nodes.

Response:

Strategy option 6: Caerphilly Basin Focus would seek to focus a significant majority of development to the Caerphilly Basin, at the expense of development in the other main settlements. This would require Caerphilly to accommodate a large amount of development that would be impractical given the constraints that it has. As such Option 6 has not been identified as a key element of the hybrid strategy.

Whilst Option 6 has not been included as part of the Hybrid Strategy, it most certainly is within the scope of the strategy as it is both a Principal Settlement and a major transport node, and as Policy PS3 sets out new development and growth will be focussed towards the principal and local centres in the first instance. Therefore, whilst not a principal element of the strategy, Caerphilly is most definitely a location being considered for new development and growth.

Action:

No amendment required.

3770 Comment

Summary of Representations:

The Council has chosen a 'Hybrid Strategy' (Policy PS2) comprised of Option 4 and Option 5 as the most appropriate for the LDP. It would be beneficial for further explanation of this hybrid option means with regard to the location and scale of growth across the settlements in the plan area.

Response:

The hybrid strategy is based on settlements rather than strategy areas as has been done in previous plans. As such it is more difficult to identify specific levels of growth due to the smaller scale of the locations. This is why the plan does not contain strategy areas, as the main settlements are dispersed throughout the County Borough and the transport nodes are strung along the main transport corridors. In addition to this the assessment of potential sites is ongoing and the exact levels of development for each settlement are still unknown.

The spatial distribution of development will be finalise during the preparation of the Deposit plan and the Council will prepare an evidence base document that will set out how the spatial distribution has been determined and how this relates to the Hybrid Strategy.

Action:

No amendment required.

An evidence base document will be prepared as part of the Deposit plan preparation to outline the spatial distribution of growth and new development.

3769 Comment

Summary of Representations:

We welcome the hybrid strategy and its focus and agree that there are significant benefits from focusing investment and growth around key public transport nodes and existing town centres as these will give the best opportunity to create accessible neighbourhoods with local services and facilities in walking or cycling distance or by public transport.

Response:

The support for the hybrid strategy is welcomed.

Action:

No amendment required.

3731 Support

Summary of Representations:

While the strategic site is no longer in the plan, the Council is encouraged to recognise the general location south and east of Maesycwmmmer is suitable for residential development.

Response:

Evidence base document EB3: Settlement Role, Function and Sustainability Analysis assesses settlements for their suitability to accommodate new development and growth in respect of the emerging plan. Maesycwmmmer has been identified as a residential settlement suitable for growth in the document. As such Maesycwmmmer has been identified as a settlement that could accommodate an appropriately located and scaled development, if sufficient land cannot be identified in the Principal and Local settlements.

Action:

No amendment required.

3640 Comment

Summary of Representations:

The hybrid strategy is supported in principle.

Concerns that Option 4 will restrict consideration of sites that are sustainably located by means of transport other than rail.

Concerns that option 5 will restrict consideration of sites that are needed to ensure there are sufficient locations of sites that provide for the range and choice of where people want to live.

Maesycwmmmer is a sustainable settlement and has an active relationship with the Principal Settlements of Ystrad Mynach and Blackwood and the Local Settlement of Newbridge as well as being in close proximity to sustainable transport. It is in conformity with the preferred strategy and should be supported for residential development.

Response:

The support for the hybrid strategy is welcomed.

In respect of Strategy Option 4 it is often a misunderstanding that the Metro relates only to rail transport. The Metro includes bus transport as well and Evidence Base Document EB3: Settlement Role, Function and Sustainability Analysis considers settlements proximity to both rail and bus transport nodes. Therefore, consideration will be given to sites that are sustainably located to bus nodes as well as train nodes.

Paragraph 7.4 of the plan acknowledges that not all of the new development can be accommodated in the Principal and Local settlements and there is a need to allocate sites in sustainable locations in other settlements which are identified in document EB3 as residential settlements suitable for growth. As such there will be a range of locations to accommodate new development in the Deposit plan.

The comments in respect of Maesycwmmmer are noted. Evidence Base Document EB3 identifies Maesycwmmmer as a settlement suitable for growth and is a location that could be considered for an appropriately located and scaled development, if the Principal and Local settlements cannot accommodate all of the proposed growth.

Action:

No amendment required.

3594 Support

Summary of Representations:

The retail development at the former Bird Factory Site and the redevelopment of the existing Lidl Risca store for mixed- use residential and flexible commercial space support the hybrid strategy outlined in Policy PS2 as both sites are located within the Principal Town of Risca.

Response:

This is not a representation in respect of the preferred strategy but supports two sites submitted as Candidate Sites during the 3rd call for sites (RNC204 AND RNC207 refers).

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3276 Comment

Summary of Representations:

The spatial strategy has yet to identify any site-specific allocations or settlement designations. Therefore, it should be minded that the spatial strategy could encounter environmental constraints, particularly around flood risk, that must early consideration in the process of site selection.

Response:

As part of the site selection process all sites are assessed thoroughly, that includes the assessment of flood risk, and for environmental and ecological impacts. The Council has already undertaken the initial phase of the Strategic Level Flood Consequence Assessment, and the more detailed assessment of sites are providing the second stage of this process. If any of the sites that the Council are considering for allocation have flood risk issues and appropriate flood consequence assessment will be undertaken to inform the selection process. The Council will continue to liaise with NRW in relation to flood risk issues in respect of the site selection process.

Action:

No amendment required.

4064 Comment**6 Sustainable Settlement Hierarchy****Summary of Representations:**

Principle settlements having access to services and facilities is questionable. Youth and community facilities are sparse. Accessible green space. Playing fields and open access play provision.

Response:

Evidence base document EB3A: Functional Analysis of Settlements in Caerphilly County Borough: Sustainability Analysis Tables sets out the services and facilities that each of the settlements has (table 5 refers). This identifies that the Principal and Local settlements have the highest numbers and broadest range of facilities of the settlements in the County Borough. The document also sets out the accessibility of the settlements and also provides an overall score that takes account of both of these factors.

The representor has not provided any evidence to support the assertion questioning whether the Principal settlements have services and facilities. All 5 of the Principal settlements have multiple GP surgeries, and only Ystrad Mynach does not have a community centre. All settlements have access to green space and play provision to varying degrees.

Action:

No amendment required.

2221 Comment**Summary of Representations:**

Any proposed development south of Bedwas Colliery is concerning due to flooding and issues relating to retaining walls.

Response:

These comments are made in respect of a candidate site (CB030) and will be considered as part of the assessment of the site.

Action:

No amendment required.

3203 Comment**Summary of Representations:**

The three site at Maesycwmmmer seem to be for 395 houses. The main road through Maesycwmmmer is already at saturation point and access to the new sites will make this worse, even without considering increased traffic from other developments.

Response:

These comments are made in respect of three candidate sites (GB009, GB011 and GB021). The traffic implications of each of these sites will be considered as part of their assessment. This will include the submission of transport assessments that will address the traffic impacts of each site and any improvements to address any adverse impacts.

In general terms the deletion of the Strategic Site as part of the plan has removed the potential for significant road improvement to alleviate this situation. Given the current position with the Welsh Government road review, it is unlikely that funding will be available to deliver any meaningful improvements to the highway infrastructure. However, in accordance with national policy set out in Future Wales the plan will seek to maximise modal shift through the identification of sustainably located development sites that will promote active travel and sustainable transport. This will reduce overall car borne traffic levels that will reduce congestion in the County Borough.

Action:

No amendment required.

2777 Object**Summary of Representations:**

The more refined approach to the settlement hierarchy is welcomed. It now distinguishes between residential settlements suitable for accommodating growth and those not appropriate for accommodating growth.

Response:

The support for the revised settlement hierarchy is welcomed.

Action:

No amendment required.

3229 Support**Summary of Representations:**

Support the identification of and Penpedairheol as a settlement suitable for accommodating growth.

Response:

The support for the categorisation of Penpedarheol is welcomed.

Action:

No amendment required.

4053 Support**Summary of Representations:**

Support the identification of Bedwas as a Local Settlement.

Response:

The support for the categorisation of Bedwas is welcomed.

Action:

No amendment required.

4052 Support**Summary of Representations:**

The settlement analysis scoring for the settlement of Penpedairheol is flawed and it should score significantly higher due to its accessibility and sustainable location.

Response:

The sustainability analysis set out in Evidence Base Document EB3: Settlement Role, Function and Sustainability Analysis and its tables set out in document EB3A has been informed by a number of data sources, including information supplied by Transport for Wales. Moving forward to Deposit the Council will revisit the data and the analysis to update it. As part of this process the assessments for the settlements will be reviewed and the comments made in respect of this settlement will be taken into account.

Action:

No amendment required.

Evidence Base Documents EB3 and EB3A be revised as part of the preparation of the Deposit plan.

4054 Object**Summary of Representations:**

Broad support for proposed settlement hierarchy.

Response:

The support for the settlement hierarchy is welcomed.

Action:

No amendment required.

3481 Support**3492 Support****3497 Support****3502 Support****3509 Support****Summary of Representations:**

Support for Maesycwmmer's status as a 'residential settlement suitable for accommodating growth'.

Response:

The support for the categorisation of Maesycwmmer as a residential settlement suitable for growth is welcomed.

Action:

No amendment required.

3595 Support

Summary of Representations:

Support the proposed settlement hierarchy.

Response:

The support for the settlement hierarchy is welcomed.

Action:

No amendment required.

3614 Support

3607 Support

Summary of Representations:

While the settlement hierarchy is generally supported, it is important that it is not interpreted too rigidly, with suitable levels of development being directed to sustainable settlements such as Maesycwmmmer.

Response:

The support for the settlement hierarchy is welcomed.

The comments relating to the importance of not interpreting the hierarchy too rigidly are noted. An element of the proposed growth for the plan will need to take place outside of the Principal and Local settlements and this growth will take place in residential settlements suitable for growth. The location of this growth will be considered against a range of factors is that the most sustainable and appropriate locations are identified.

Action:

No amendment required.

3645 Comment

Summary of Representations:

Paragraph 6.2 refers to four tiers in the settlement hierarchy, this should be amended to reflect that there are 5 tiers.

Response:

Paragraph 6.2 references 4 tiers of the settlement hierarchy, but omits the fifth category, rural settlements, of the bottom of the list.

Moving forward the Deposit plan will need to include all 5 categories when referencing the settlement hierarchy.

Action:

No amendment required.

The comment be noted and the Deposit plan refers to all 5 categories when referencing the settlement hierarchy.

3771 Object**Summary of Representations:**

The identification of Maesycwmmmer as a suitable settlement for accommodating growth is accepted.

Response:

The support for the categorisation of Maesycmmer as a settlement for accommodating growth is welcomed.

Action:

No amendment required.

3872 Support**7The Revised Preferred Strategy****Summary of Representations:**

General support for preferred strategy.

Response:

The support for the Revised Preferred Strategy is welcomed.

Action:

No amendment required.

2205 Support**Summary of Representations:**

Concern about resilience on one large strategic site.

Response:

The concern regarding the reliance one large strategic site is noted.

It should be noted, however, that the strategic site has been deleted from the Revised Preferred Strategy and is not an allocation proposed in the plan.

Action:

No amendment required.

2329 Comment**Summary of Representations:**

The plan will have a negative effect on the Welsh language as it will result in the native population being replaced by people of an unknown demographic and geographic location.

There is no evidence to suggest that the LDP's in-migration policy will create a more multicultural community, nor is there the opportunity to determine which culture(s) should be imported into the County Borough.

Response:

As part of the preparation of the plan an Integrated Sustainability Appraisal has been prepared that assesses the impacts the plan would have if implemented. The ISA incorporates the Welsh Language impact assessment of the plan. The ISA found no adverse impacts in respect of the Welsh Language.

It should be noted that Caerphilly has grown over time due to people moving into the town from elsewhere. This is how Caerphilly has grown over the past 200 years. This in-migration has resulted in a thriving community and there is no evidence to suggest the continuation of this long-term trend would have any different outcome.

Action:

No amendment required.

2343 Object**Summary of Representations:**

The hybrid strategy is supported, provided new development is employment/leisure, not housing.

Response:

The hybrid strategy seeks to address the significant issues that would arise from a declining population should the recent demographic trends continue. Not least of these is to address a significant reduction in the economic population that would lead to the County Borough's economy declining. As a result the hybrid strategy proposes housing growth to deliver employment growth that would address these issues and assist the County Borough in delivering regional aspirations.

Focussing solely on employment uses would be inappropriate as it would not address the underlying demographic issues and the declining population would result in a workforce shortage for any jobs that may be created. It is essential that

employment is delivered with an appropriate level of housing and this is what the hybrid strategy seeks to do.

Action:

No amendment required.

3242 Comment

Summary of Representations:

The increase in population will have an adverse impact on the Welsh language.

Response:

As part of the preparation of the plan an Integrated Sustainability Appraisal has been prepared that assesses the impacts the plan would have if implemented. The ISA incorporates the Welsh Language impact assessment of the plan. The ISA found no adverse impacts in respect of the Welsh Language.

Action:

No amendment required.

3244 Object

Summary of Representations:

Supported in principle, though despite strategy option 3 no longer being followed, Maesycwmmer should still be considered a suitable location for development.

Response:

The support for the preferred strategy is welcomed.

Maesycwmmer has been identified as a residential settlement suitable for growth. As such Maesycwmmer is considered a suitable location for appropriately located and scaled development and will be considered as part of the process of identifying allocations for the Deposit plan.

Action:

No amendment required.

3871 Support

Summary of Representations:

A number of the issues facing the plan are interlinked, e.g. the need to promote and deliver both market and affordable housing in places where people want to live and the need to proactively attract people into the County Borough to deliver growth in

accordance with the Revised Preferred Strategy. It is, therefore, important that these matters are considered holistically to ensure an appropriate policy response through the RLDP

Response:

It is agreed that the plan will need to address the issues in a holistic way, and will need to provide housing and employment opportunities in sustainable locations that will assist in attracting people to the County Borough. The Revised Preferred Strategy has been prepared on this basis and will be further refined as part of the process for considering and identifying sites for landuses in the Deposit plan.

Action:

No amendment required.

3641 Comment

Summary of Representations:

The LDP should support and enhance nature networks and maximise opportunities for biodiversity net gain. Air quality issues will need to be addressed, particularly those arising as a result of transport related activity.

Response:

The Council has prepared the strategic stage of its Green Infrastructure Assessment (GIA) that accompanies the Revised Preferred Strategy. The GIA addresses the issue of Resilient Ecological Networks (RENs) and biodiversity net benefit. The GIA has been prepared in line with Guidance Note 42: GIAs produced by NRW. The GIA will be refined and revised to provide a more detailed level assessment and include site specific information in relation to green and blue infrastructure and RENs. The Council will continue to work closely with external stakeholders to develop the GIA for the Deposit plan.

Environmental issue EN02 specifically addresses the issue of air pollution, including its importance in respect of transport emissions. In moving toward the Deposit plan the Council will undertake transport assessments and modelling that will take account of, and mitigate for, the transport and air quality issues arising from the plan.

Action:

No amendment required.

3634 Comment

Summary of Representations:

Infrastructural provision will be required and the Council will need to work in conjunction with others. Despite the proposed level of new housebuilding, no new infrastructural facilities are mentioned.

Response:

Social Issue SO5 specifically addresses the need to provide community facilities and infrastructure to complement the proposed growth set out in the plan to meet the needs of the County Borough. There are no landuse allocations in the Revised Preferred Strategy and as such no formal facilities or sites for infrastructure provision have been identified.

These will be identified in the next stage of the plan, the Deposit plan.

In preparing the Deposit plan and identifying its allocations the plan will identify infrastructure that will need to be provided to ensure development can be delivered appropriately and sustainably. The Council will continue to work with infrastructure providers and statutory undertakers to ensure that the proposed development in the plan is appropriately serviced.

Action:

No amendment required.

3633 Comment

Summary of Representations:

The RPS is unsound and not fit for purpose, for the following reasons:

- The stated vision/aims appear to relate to new developments ignoring previous deficiencies and planning shortfalls. It is unlikely even new development would comply with the County's planning obligations, based on previous results. The RPS does not properly understand the planning meaning of sustainability i.e. meeting the needs of the present without compromising the ability of future generations to meet their own needs;
- The RPS fails to take a holistic approach to planning;
- Does not comply with Welsh Government planning policies;
- Fails to adequately comply with the Well-Being of Future Generations Act which places a duty on public bodies to carry out sustainable development, and requires an improvement in the delivery of all four aspects of well-being: social, economic, environmental and cultural. The planning system should create sustainable places which are attractive, sociable, accessible, active, secure, welcoming, healthy and friendly;
- Facilitating accessible and healthy environments by ensuring the appropriate balance of uses and density;

- Our communities need the right mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives;
- Natural, historic and cultural assets must be protected, promoted, conserved and enhanced;
- Consider short-term and long-term consequences...on a community, including composition, cohesion, character;
- Planning authorities must consider the likely effects...Welsh language...without adversely impacting its use.

Response:

Whilst the respondent has given reasons for considering the plan unsound and not fit for purpose, no evidence has been provided to support them.

The 2RLDP looks forward to 2035 as its plan period and seeks to address the issues that will arise over the plan period and plan accordingly. In doing so the plan will address the issues that exist, including any relevant issues arising from the Adopted LDP. The Revised Preferred Strategy fully encompasses the principle of sustainable development, which is the combination of Social, Economic, Environmental and Cultural factors, in fact the issues, aims and objectives of the plan are set out to reflect these. In delivering a plan that addresses the 4 pillars of sustainability the plan will deliver sustainable development.

The Revised Preferred Strategy sets out an overarching policy framework that addresses the issues facing the County Borough at a strategy level. Whilst further detailed policies and allocations will be introduced through the Deposit stage the Revised Preferred Strategy provides the framework for developing a comprehensive policy framework for considering future development proposals.

There is no foundation for the representor's assertion that the plan does not comply with Welsh Government planning policies. Welsh Government has responded on the Revised Preferred Strategy and has stated "The Welsh Government is of the opinion that the Caerphilly County Borough Council Replacement Local Development Plan (2020-2035) Revised Preferred Strategy is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3)."

As outlined above the Revised Preferred Strategy has addressed all 4 pillars of sustainability and addresses the requirements of the Well-being Act, providing a policy framework to deliver sustainable development in the future.

In preparing the Deposit plan the Council will prepare a detailed policy framework that will consider the issues of density and landuses across the County Borough. In addition to this, density and landuse will be considered through the Candidate Sites process as sites are identified for allocation. The Revised Preferred Strategy provides the framework for the more detailed policies to be produced as part of the Deposit plan.

The Revised Preferred Strategy provides the framework for the Deposit plan to identify the appropriate mix of good quality/well designed homes, jobs, services, infrastructure and facilities so that people feel content with their everyday lives;

In terms of historical and cultural assets Cultural Issues CU5, Key Aim N and Key Objectives 23 and 24 all address this issue. In terms of the natural environment Environmental Issues EN4 addresses blue and green infrastructure and EN6 addresses priority habitats and ecological connectivity.

In terms of consequences the Council has prepared an ISA that considers the impacts that the plan will have, identifies any issues arising and proposed actions and mitigations in respect of any significant adverse impacts.

The ISA also considers impacts upon health and the Welsh language.

Given the above there is no foundation to the representors assertion that the plan is unsound and not fit for purpose.

Action:

No amendment required.

3246 Object

Summary of Representations:

Some areas have good public transport links other areas have poor transport links. So, the LDP must seek to recognise such issues and additionally focus on development around and or linked to existing transport hubs/links.

It appears that in CCBC the trend is increasing car usage.

Such increase of car usage has a detrimental impact on communities.

Developing areas around established transport links appears to offer an alternative rather than out of town developments. Active travel particularly walking and cycling, is also welcomed as an alternative to car usage. But is limited in that facilities to do so safely and the locations for community facilities must be accessible. Here the LDP plan appears light weight.

Response:

The comments in respect of the transport network are noted. Policy PS 14 sets out the Council's position to promote modal shift, which includes active travel - particularly for short trips, to assist in meeting the national modal shift targets.

The Council is promoting and enhancing the active travel network through the proposals identified on the Council's Interactive Network Map and the relevant proposals from this will be identified in the Deposit plan as allocations.

Action:

No amendment required.

3406 Object**Summary of Representations:**

Many businesses in the area cite problems with business development or sustainability. Such issues include skills in the workforce, availability of suitable employees, business premises or movement to larger premises to facilitate growth.

Plus, support to businesses and or inducements to relocate to the area.

What appears evident is an absence or lack of start up or micro business premises/units across the area. Such should be offered within the LDP to seek local employment and higher paid jobs.

Also given comments above in transport section any workforce must be able to access work locations as and when required. So an interrelationship between business locations and transport is key to facilitate growth and or initial development.

Response:

The Council has prepared an evidence base for employment that has assessed the employment need for the County Borough and identified a quantum of land that is necessary to deliver the growth and development required to address the need. The assessment of need has taken account of the demand for start-up units for SMEs and also for larger sites to accommodate businesses that are looking to expand.

The Deposit plan will identify relevant allocations that will enable the provision of the land required to deliver growth and development.

Action:

No amendment required.

3408 Object**Summary of Representations:**

Housebuilding indiscriminately, traffic increase and pollution all create a deteriorating environment in the area. This will be exasperated in any loss of greenfield sites, green buffer zones, green corridors, SSSI, SPAs, SACs and other open areas must be protected with vigour by CCBC. More than a policy legislation demands it (PPW 6.2.28) "Planning authorities firstly must ensure that development avoids and then minimises impact on biodiversity and ecosystems".

Also (PPW 6.4.15) “The first priority for planning authorities is to avoid damage to biodiversity in its widest sense--- planning authorities will need to be satisfied that any reasonable alternative sites--- that would result in less harm, no harm or benefit have been fully considered”. Can this LDP satisfy such legal requirements?

It will be sited that the plethora of candidate sites, over exuberant building of the wrong type of premise, absence or lack of repurpose, reuse, refurbish of premises and slow return of void premises does not comply with the intent or legislative requirements in Wales.

We have demands of a climate emergency declared in Wales, (2019) and net zero targets. Yet some potential 4000 houses over and above identified need is contained in this LDP, Greenfields under threat, flooding risks increased and placemaking sidelined. So how can we reconcile the environmental needs against this plan.

Response:

The plan will adhere to the approach required by national policy with respect to the allocation of previously developed land.

The Council will allocate brownfield sites where they are viable, deliverable and in sustainable locations, but these sites will only deliver a small proportion of the requirements for the County Borough. Greenfield development is essential to deliver the overall requirements of the plan. It should be noted that Brownfield land contains some of the most important and diverse habitats that we have in the County Borough. Conversely a significant amount of the greenfield land surrounding our settlements is comprised of improved agricultural grassland which has little if any importance for nature conservation or biodiversity, with the exception of field boundaries, where they are comprised of stone walls or hedgerows (and these can be maintained and enhanced as part of development proposals).

There is no evidence to support the assertion that the plan identified 4000 houses more than is required, the plan identifies the appropriate level of development to meet the strategy.

The Council has prepared a Green Infrastructure Strategy that addresses the issue of blue and green infrastructure and its protection and enhancement.

As such the Revised Preferred Strategy provides a framework to deliver the growth for the strategy that is compatible with meeting the climate change emergency.

Action:

No amendment required.

3410 Object

Summary of Representations:

We see a concentration of housing development in the South of the area, with high pressure from developers for candidate sites near to arterial routes, (M4 and A470).

Having a disproportional impact on the Caerphilly basin which appears to run unabated to date.

Unfortunately, we see a limited development along the North of the area. It seems unclear from current performance what the strategy is.

Emerging and growing dis-satisfaction is evident in many communities in relation to building developments and housing. Comments concerning the perceived lack of engagement, listening, and reacting to community objections, ideas, local knowledge and the impacts expected on day to day lives are raised regularly

Response:

In preparing the 2RLDP the Council has to take account of national planning policy and the financial viability and deliverability of sites that it allocates for development.

Welsh Government policy seeks to locate development to the main towns and cities. In respect of the 2RLDP this means targeting development to the 5 Principal settlements and 4 Local settlements in the settlement hierarchy. In addition to this Welsh Government has, in its response to the Revised Preferred Strategy, sought clarification on how much development is being focussed on Caerphilly town.

The Council, when allocating sites for development in the plan, must be able to demonstrate that the sites are financially viable and can be delivered within the plan period. Land values in the north of the County Borough are very low and, as a result, the viability of development in this area is marginal at very best. This is why little development takes place in this part of the County Borough.

The Council will continue to try to promote and encourage development in the north of the County Borough, but will also need to allocate development in the southern and mid parts of the County Borough to demonstrate that it can meet the growth set out in the strategy.

Action:

No amendment required.

3414 Object

Summary of Representations:

If we turn to the issue of a holistic development policy, then where developments are planned and have been completed several factors should be evident.

Yet we see regular comments from communities that this is not the case. Often the outcomes appear to be of public concern. People report: ---

- Poor transport links.
- Flooding and pollution.

- School or higher education placements difficult.
- Health and care facilities difficult or remote.
- Increased crime and or ASB in an area.
- Congestion and travel times increased.
- Reliance on private cars.
- Air quality, noise, and dirt issues.
- Leisure facilities absent or oversubscribed.
- Damage or change to environmental factors in an area.
- General deterioration in the indigenous people's way of life and culture.

Response:

The 2RLDP will provide a comprehensive framework for considering development proposals in the future, which will address the issues identified by the representor. In preparing the Deposit plan, the Council will work with infrastructure providers and statutory undertakers to provide the commensurate level of infrastructure provision that supports the proposed growth in the plan.

It should also be noted that many elements of infrastructure, such as medical facilities and policing are outside the remit of the Council and whilst the Council will work with the providers and make allocations for their provision, it is not responsible for that provision.

Action:

No amendment required.

3415 Object

Summary of Representations:

The town centre strategy does offer a welcomed way forward which may actually have greater benefits than anticipated. Town and village centres often contain underutilised or void premises. Repurposing some underutilised premises to smaller high-density housing may offer several benefits. Such an approach may greatly negate the need for further urban sprawl. A focus of housing options near town/village centres and located on or near existing transport corridors may actually create good examples of placemaking in line with PPW.

Response:

The comments in respect of the town and village centres are noted.

The Revised Preferred Strategy seeks to focus growth on the main settlements in the County Borough and toward the main transport nodes. The Council will seek to identify appropriate sites in these centres that will support the retail strategy.

However, these settlements have significant restraints that will limit their ability to accommodate growth and development will need to go to other settlements as well.

Action:

No amendment required.

3419 Comment

Summary of Representations:

The reality in the UK is that there is a chronic and long-term decline of biodiversity and natural habitat disruption or loss across Wales. Such consideration must be a key element and overriding pillar in the development of the LDP. LDP must proactively identify sites of specific scientific interest, (SSSIs), special protection area, (SPAs) and special areas of conservation, (SACs) with as much vigour as they identify land banks.

Recognition and protection and regeneration of natural habitats not only has environmental benefits but is of practical value to developers in assistance with control of flooding, improvement of air quality, soundscapes, and support to protected species. All with community benefits. Additionally, some heavily contaminated sites may be better served by different approaches employing biodiversity options and creating a safe amenity space.

Response:

Biodiversity net benefit and sustainable development are requirements of development proposals and the planning system in Wales. As such these issues are key pillars for the development plan and have been incorporated into the Revised Preferred Strategy. It should be noted, however, that SSSIs, SPAs and SACs are all identified under separate legislation and the Council is not able to identify these or introduce them in their development plans.

The Council has prepared its Green Infrastructure Assessment (GIA) that is published as part of the consultation. The GIA considers the issues of blue and green infrastructure, including natural habitats, flooding and surface water. The GIA will be revised and updated as part of the process of preparing the Deposit plan, and will reflect that the plan will identify sites for development. It will also identify land important for biodiversity and habitat enhancement. As such these issues are at the heart of the 2RLDP.

Action:

No amendment required.

3421 Comment

Summary of Representations:

Flooding is a growing concern in areas of development. The geography of CCBC area creates some likelihood of flooding.

The very fact that developments are built changes the potential for flooding.

Additionally, climate change; indicates increased rainfall, storms and extreme weather patterns are predicted. Such factors must be considered for developments and for environmental issues. Water runoff from developments must be a key consideration in any LDP or subsequent development.

Response:

It is acknowledged that flooding is a growing concern and the impacts of climate change will increase the potential for flood risk. It should be noted, however, that a separate approval process that considers the flood risk issues and sustainable drainage approaches used on development operates in Wales and is overseen by the Sustainable Drainage Approval Body (SAB). This system looks to reduce the level of flood risk currently experienced through the use of sustainable drainage measures. The outcome of this process is that development will actually reduce the risk of flooding, not increase it.

In terms of the 2RLDP the Council has prepared the first stage in its Strategic Flood Consequence Assessment and the stage 2 part of the assessment is being delivered through the active involvement of the SAB authority in the assessment of Candidate Sites. All sites that are allocated in the plan for development will have been the subject of assessment for flood risk and , where appropriate, mitigation measures will be identified.

Action:

No amendment required.

3422 Comment

Summary of Representations:

Include a requirement for developers to undertake a Health Impact Assessment (HIA) on major development proposals at pre-application or application stage. A HIA will identify potential positive and negative impacts on wider determinants of health and health inequalities and enable recommendations to be made to address these impacts.

Response:

Detailed policies will be a matter for the Deposit plan. It should be remembered that the plan in its entirety is subject to HIA through the Integrated Sustainability Appraisal (ISA) process.

Action:

No amendment required.

4062 Comment

Areas of Growth

Summary of Representations:

Bedwas does not have rail or major bus stations. One of the buses (service H) is going to be terminated, so Bedwas will only be served by buses in the East and near Peters Pies. This is a 25 minute walk from the proposed housing estate West of Bedwas. This would also put more traffic on roads and cause even more congestion on the Peters pies junction where there is lots of queueing already at peak times. The West of Bedwas does not have sustainable transport routes.

Response:

Bedwas is the second largest centre in the Caerphilly Basin Masterplan Area, and it acts as a Local Settlement that provides services and retailing to the immediate area. The presence of the Gallagher Retail Park on the outskirts of Caerphilly, close to Bedwas has a significant effect, attracting major food retailing and other spend from the area.

Bedwas scored 33 on the Sustainable Location Analysis, primarily due to it being a Local Settlement and its employment function. It loses out on proximity to bus and rail stations, but these are located fairly closely in Caerphilly Town. Given its identification as a Local Settlement and its relatively high score, Bedwas is suitable for future growth, although appropriate land may be difficult to identify due to the fact that the settlement is largely constrained by other settlements. The constraints on Bedwas means that it is likely to accommodate only a small level of development.

Action:

No amendment required.

2190 Object

Summary of Representations:

Disappointment over a lack of proposed development in the north of the County Borough. Concentrating on the Mid Valleys will lead to an imbalance.

Response:

The allocation of specific sites will be a matter for the Deposit plan. Strategy Option 2: HOVRA Focus may not be a part of the Preferred Strategy, but the 2RLDP will seek to make provision for development in the north of the County Borough, having regard for viability and the requirement to demonstrate deliverability.

Action:

No amendment required.

3672 Object

Summary of Representations:

I agree with the concept of town centre regeneration, but the town centre of Caerphilly has been defined too tightly around the castle. This means that leisure activities in the Basin are excluded from investment (e.g. Caerphilly Miners Centre, a thriving community hub, cannot get town centre investment any more). A more robust strategic vision to underpin the LDP is needed. Not enough critical mass of activities to attract people to TC - especially as the draw of the castle isn't linked with the leisure needs of the community. Parking, disability access and bus routes all need review.

Response:

CCBC will publish the proposed commercial-centre boundaries in the Deposit plan. A typical commercial centre has a mix of commercial uses (as well as some housing) and is easy to reach on public transport. Not every commercial or community facility in a town can be in the defined commercial centre. Many facilities serve neighbourhoods instead of whole towns or villages. The fact that a facility may be outside a commercial centre does not make it ineligible for every type of funding.

Parking: Detailed policies of the Deposit plan, along with supplementary planning guidance (to be published after the 2RLDP has been adopted), will cover parking requirements.

Bus routes: Significant improvements to bus services are being considered for future phases of Metro Funding.

Need for an accessible built environment: Key Objective 15 seeks to 'promote accessibility for all'. Detailed policies of the Deposit plan will cover the design of the built environment too.

Action:

No amendment required.

2241 Comment

Summary of Representations:

Concerns over allocation of land ('Land parallel to Pengam Road, Penpedairheol') anticipated for submission regarding access and traffic congestion.

Response:

The allocation of specific sites will be a matter for the Deposit plan. Should a site be submitted for consideration in response to the call for candidate sites, it will be assessed in the appropriate manner.

Action:

No amendment required.

3761 Comment**3762 Comment****Summary of Representations:**

Support is given, in principle, to Policy PS4 specifically in relation to Maesycwmmmer being identified as a residential settlement suitable for accommodating growth due to the strong relationship with the Principal Settlements of Ystrad Mynach and Blackwood and the Local Settlement of Newbridge as well as being in close proximity to sustainable transport routes. It is clearly evidenced that Maesycwmmmer is capable of accommodating appropriate residential growth, in particular the Candidate Site at Boot Field.

Response:

The comments made in support are noted.

Part of this comment relates to a Candidate Site (3rd call - GB207: The Boot Field, Maesycwmmmer). For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3873 Support**Policy PS3: Settlement Hierarchy****Summary of Representations:**

West Bedwas should not be included as has poor transport links and will encourage more cars on the road. The day time bus serving this areas is being removed.

Response:

Bedwas is the second largest centre in the Caerphilly Basin Masterplan Area, and it acts as a Local Settlement that provides services and retailing to the immediate area. The presence of the Gallagher Retail Park on the outskirts of Caerphilly, close to Bedwas, has a significant effect, attracting major food retailing and other spend from the area. Bedwas scored 33 on the Sustainable Location Analysis, primarily due to it being a Local Settlement and its employment function. It loses out on proximity to bus and rail stations, but these are located fairly closely in Caerphilly Town. Given its identification as a Local Settlement and its relatively high score, Bedwas is suitable for future growth, although appropriate land may be difficult to

identify due to the fact that the settlement is largely constrained by other settlements. The constraints on Bedwas means that it is likely to accommodate only a small level of development.

Action:

No amendment required.

2191 Object

Summary of Representations:

The Principal settlements identified are already over developed. Ystrad Mynach has issues with flooding and inadequate sewerage infrastructure which cannot deal with current household requirements.

Response:

The Principal Settlements are considered the most sustainable locations for further development within the County Borough. Further detail is set out in EB3 (Settlement Role, Function and Sustainability Analysis). Sites proposed for further consideration are assessed against a range of relevant factors and constraints, including flood risk and sewerage infrastructure, and the plan will ultimately adhere to national policy with respect to these matters.

Action:

No amendment required.

2222 Comment

Summary of Representations:

Policy PS3 - Settlement Hierarchy - this hierarchy

- Principal Settlements: Bargoed, Blackwood, Ystrad Mynach, Caerphilly, Risca/Pontymister
- Local Settlements: Rhymney, Nelson, Newbridge, Bedwas
- Residential Settlements Suitable for accommodating Growth:
- Residential Settlements Not Suitable for accommodating Growth:
- Rural Settlements: All other settlements located outside defined settlement boundaries

This policy should include a clear statement indicating a presumption against any residential development beyond the above hierarchy.

Response:

Paragraph 3.60 of Planning Policy Wales (Edition 12, February 2024) addresses the matter of development outside defined settlements, and 2RLDP policy PS3 should not duplicate national policy or guidance. Other policies may cover particular forms of development outside defined settlements, though these will be a matter for the Deposit plan.

Action:

No amendment required.

2536 Comment**Summary of Representations:**

Bedwas is identified for growth based on criteria which include local facilities. Since this work the Council is looking to close several of the facilities which made it suitable, particularly the leisure centre and library. This makes it less suitable in regard to the Placemaking principles. This decision on the status of Bedwas should be reviewed in the light of these changes.

Response:

CCBC understands the point about the public facilities that may yet close. However, Bedwas is the second largest centre in the Caerphilly Basin Masterplan Area, and it acts as a Local Settlement that provides services and retailing to the immediate area. The presence of the Gallagher Retail Park on the outskirts of Caerphilly, close to Bedwas, has a significant effect, attracting major food retailing and other spend from the area. Bedwas scored 33 on the Sustainable Location Analysis, primarily due to it being a Local Settlement and its employment function. It loses out on proximity to bus and rail stations, but these are located fairly closely in Caerphilly Town. Given its identification as a Local Settlement and its relatively high score, Bedwas is suitable for future growth, although appropriate land may be difficult to identify due to the fact that the settlement is largely constrained by other settlements. The constraints on Bedwas means that it is likely to accommodate only a small level of development.

Action:

No amendment required.

3054 Comment**Summary of Representations:**

Support the additional tier in the settlement hierarchy of residential settlements suitable for accommodating growth. For the sake of clarity, the relevant settlements should be listed under the policy PS3.

Support is also given to the clarification that development in suitable residential settlements will be allowed where it accords with the function of the settlement, is based on sound placemaking principles and promotes sustainable transport.

Response:

The comments made in support are noted.

The need to specify the settlements in each of the tiers of the hierarchy is understood. The settlements under each tier of the hierarchy are set out under paragraph 6.2 of the Revised Preferred Strategy. Including them in the policy would make the policy overly long and unwieldy. It is considered that the settlements should be referenced in the reasoned justification to the policy in the Deposit plan.

Action:

No amendment required.

3231 Support

Summary of Representations:

Sufficient growth needs to be directed to tier 3 settlements, and their role must not be underplayed. PS3 and PS4 must be applied with sufficient flexibility to ensure the right development comes forward in the right places.

Response:

The Revised Preferred Strategy seeks to focus growth to the Principal and Local Settlements in the first instance. However, due to their constraints these settlements will not be able to accommodate all of the growth proposed in the plan. The tier 3 settlements will therefore need to accommodate a proportion of the growth. The distribution of the growth across the County Borough will be considered in preparing the Deposit plan, and the role of the tier 3 settlements will be given due consideration.

Action:

No amendment required.

3646 Comment

Summary of Representations:

We welcome the strategy of locating new development according to the hierarchical structure, with most residential development growth located in principal and local centres.

We suggest including a requirement for developers to undertake a Health Impact Assessment (HIA) on major development proposals at pre-application or application stage. A HIA will identify potential positive and negative impacts on wider

determinants of health and health inequalities and enable recommendations to be made to address these impacts.

Response:

The comments made in support are noted.

Action:

No amendment required.

3732 Comment

Summary of Representations:

As Caerphilly is in the Welsh Government's national development plan 'Future Wales's - SE Wales Strategic Growth Area', the proposed housing and employment growth figures appear reasonable; and without strategic sites the extension of existing sustainable settlements is a rational approach.

Response:

The comments made in support are noted.

Action:

No amendment required.

3817 Comment

Summary of Representations:

-The settlement of Caerphilly should be at the top of the settlement hierarchy as its own tier, perhaps re-instating the 'Sub-Regional Principal Town' tier that the now withdrawn 2016 Deposit RLDP sought to introduce.

-This would align with the expectations set in Page 175 of Future Wales: The National Plan 2040 which recognises the strategic importance of the settlement.

Response:

Whilst it is accepted that Caerphilly town is alone within the County Borough in terms of the explicit recognition of its sub-regional role, it is not considered that the settlement hierarchy, as presently constituted, is contrary to this, nor would it prevent Caerphilly from maximising its contribution in this regard.

The County Borough consists of a number of functional areas and, whilst it is conceded that different conclusions can be drawn in terms of their number and extent, depending on the factors being considered, this general point has long been accepted. The Adopted LDP employs a strategy of three areas, each with a principal town, whilst the 2RLDP seeks to utilise five insofar as the setting of the hierarchy is

concerned (although the principal towns proposed in the emerging plan are unchanged). It is considered that using this as a basis for the settlement hierarchy is equitable, allowing as it does a focus for development within each of the five areas whilst still ensuring that development can be targeted towards the more sustainable settlements located in each, as well as taking account of regionally important policy initiatives such as the South Wales Metro. None of this should prevent Caerphilly town from contributing to the development of the regional economy; from fulfilling its role in terms of facilitating regional and sub-regional interconnectivity; or from providing a location for a commensurate and sustainable quantum of development. Indeed, its status as the County Borough's largest town should ensure that it serves as the primary focus of development in local terms, in conjunction with the strategy proposed.

Action:

No amendment required.

3849 Object

Summary of Representations:

It is very surprising that Markham is listed as a Settlement not being suitable for growth. The village benefits from the following facilities and services: Commercial centre that includes hot food takeaways, pharmacy, public house, hairdresser and national retailer convenience store (OneStop) Doctors Surgery Primary school, District sports and community centre, Rugby/football pitches, Children's Park

As well as these facilities, Markham is served by a regular bus service and is located within 1.7 miles of Bargoed town centre (1.5 miles to Bargoed train station) and 3.0 miles of Blackwood town centre, both of which are listed as Principal settlements.

Section 6 of the Pre-Deposit Plan (Revised Preferred Strategy) relates to the 'Sustainable Settlement Hierarchy'. It states that to establish a settlement hierarchy, and where development would be supported (or not supported), settlements were assessed on a number of criteria including their size, the services they provide, and accessibility and their transport links.

Section 6 also lists the residential settlements suitable for accommodating growth (39no. villages listed), and residential settlements not suitable for accommodating growth (11no. villages listed - including Markham).

A settlement of note on the 'suitable for accommodating growth' list is Hollybush. Hollybush has no community facilities other than a Community Centre, and is located further away from the nearest Principal settlement, i.e. Blackwood, than Markham. It has no shops, doctors' surgery, school, etc. and is therefore far less sustainable than Markham.

Also on the list of settlements classed as not being suitable for growth is Abertysswg. However, the candidate site list that accompanies the revised preferred strategy identifies a candidate site (Ref: HOV101 - Land west of Carn y Tyla Terrace) as being able to accommodate 130-150 units. Therefore, despite being listed as a

settlement not suitable for growth, a large candidate site has been supported for allocation in Abertysswg, and it is considered that the Site put forward as part of this submission is also suitable and deliverable.

Response:

The sustainability analysis set out in evidence base document EB3: Settlement Role, Function and Sustainability Analysis and its tables set out in document EB3A has been informed by a number of data sources, including information supplied by Transport for Wales. Moving forward to Deposit the Council will revisit the data and the analysis to update it. As part of this process the assessments for the settlements will be reviewed and the comments made in respect of this settlement will be taken into account.

Action:

No amendment required.

Evidence base documents EB3 and EB3A be revised as part of the preparation of the Deposit plan.

4051 Object

Policy PS4: Areas of Growth

Summary of Representations: Further detail will be required.

Response:

Comment is noted.

Action:

No amendment required.

2324 Comment

Summary of Representations:

The local authority should seek early engagement with NGED to ensure that the proposed growth can be accommodated and the grid infrastructure can be maintained.

Response:

Comment is noted. The allocation of specific sites will be a matter for the Deposit plan.

Action:

No amendment required.

3124 Comment

Summary of Representations:

This is generally welcome. However, as PPW 12 states that brownfield sites should be reviewed before greenfield allocated, this policy may be difficult to achieve in Caerphilly basin. So much is very contaminated that some areas, like Bedwas, may only be developable if money is found to support the restoration and remediation of these sites. Allocating greenfield land makes brownfield land less economic viable. Squeezing land availability and working with others to help finance brownfield land would be most effective and good for local people's health.

Much brownfield has been undeveloped despite LDPs for last 15 years. New approach needed.

Response:

Comment in support is noted.

While the allocation of sites will be a matter for the Deposit plan, the process of site selection, including the assessment of candidate sites, will ensure compliance with national policy in terms of the prioritisation of previously developed land, as well as the requirement that sites proposed for allocation are demonstrably deliverable. The viability of particular sites remains an issue, and the Council will continue to explore means of bringing sustainably-located sites forward in appropriate instances.

Action:

No amendment required.

3216 Support

Summary of Representations:

Lichfields (on behalf of Llanmoor Homes) support the additional tier in the settlement hierarchy of residential settlements suitable for accommodating growth. For the sake of clarity, the relevant settlements should be listed under the policy PS3.

Support is also given to the clarification that development in suitable residential settlements will be allowed where it accords with the function of the settlement, is based on sound placemaking principles and promotes sustainable transport.

Response:

The comment in support is noted.

The need to specify the settlements in each of the tiers of the hierarchy is understood. The settlements under each tier of the hierarchy are set out under paragraph 6.2 of the Revised Preferred Strategy. Including them in the policy would

make the policy overly long and unwieldy. It is considered that the settlements should be referenced in the Reasoned Justification to the policy

Action:

No amendment required.

3232 Support

Summary of Representations:

- Support in principle.

-Maesycwmmer is a 'residential settlement suitable for accommodating growth' owing to its strong relationship with the Principal Settlements of Ystrad Mynach and Blackwood and the Local Settlement of Newbridge as

well as being in close proximity to sustainable transport routes.

-The continuation of Housing Allocation HG1.40 Land at Gellideg Heights and the surrounding land as per Candidate Site GB021 should be supported, especially given the fact that Pobl Housing Association

are progressing a planning application and are under contract.

Response:

Comment in support is noted.

In terms of the comment made in relation to the existing housing allocation and candidate site, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3596 Support

Summary of Representations:

We would welcome the opportunity to be involved in early discussions about the impact of proposed housing developments and the opportunity for Section 106 funding to be made available for necessary healthcare infrastructure that would arise from new developments.

The ABUHB Estates Strategy 2018-2028 set out the plan for modernising and developing this network of facilities.

Suggest including a principle of liaising with the Health Board at pre-application stage of major developments to fully assess the impact healthcare services, particularly primary and community care.

Suggest including a requirement that the local planning authority engage with the Health Board during the negotiation of Section 106 agreements with developers to secure additional benefits and contributions toward healthcare infrastructure.

ABUHB Pharmaceutical Needs Assessment.

The Health Board conducted a needs assessment including evaluating community pharmacy provision against projected population growth figures in 2021. Additional housing proposed within the RLDP will put additional pressure on pharmacy services.

Suggest a specific consideration of the impact of new developments on community pharmacy as set out in the Pharmaceutical Needs Assessment

Response:

Comment is noted. The allocation of sites will be a matter for the Deposit plan, but the Council welcomes the opportunity to engage with ABUHB on site-specific matters, and implications for the healthcare estate.

Planning applications are distinct from the 2RLDP and subject to discrete, though interrelated, statutory oversight. Though the 2RLDP can influence how policy matters are considered with respect to planning applications, it cannot impact on the regulatory procedures by which they are determined.

Action:

No amendment required.

3733 Comment

Summary of Representations:

The spatial distribution of housing components should relate to the settlement tiers identified in Policy PS3 to aid clarity to the plan and to understand the growth attributed to each settlement tier.

The plan should be clear how growth has been directed to more sustainable locations as defined in the Councils settlement hierarchy.

Response:

The allocation of specific sites will be a matter for the Deposit plan. However, it is envisaged that the contextual basis for the allocation of sites will be made clear, in terms of its relationship to the hierarchy.

Action:

No amendment required.

3772 Comment**Summary of Representations:**

In addition, the plan makes an allowance for 1379 windfall units, but it is not clear where (spatially) they may come forward.

Response:

By definition, the location of windfall sites is unknown until such time as proposals are submitted. The consideration of potential sites within the context of the hierarchy will be relevant to the determination of any such proposals.

Action:

No amendment required.

3773 Comment**Summary of Representations:**

The Sustainability Appraisal references Welsh Language and its importance within the wider plan which is positive. The plan/evidence could be improved by explaining how locations for development align/support the Council's Sustainable Communities for Learning 9 year Strategic Outline Programme in terms of Welsh medium projects and developments and how the LDP will support these commitments. Consideration should also be given to surplus places data within Welsh medium schools in the LPA to ensure that any current issues are not exacerbated by the LDP.

Response:

While the allocation of specific sites will be a matter for the Deposit plan, engagement will continue to be undertaken with colleagues, including those from Education, in order to ensure that interrelated corporate priorities can be supported and, where appropriate, given effect in land-use terms.

Action:

No amendment required.

3774 Comment**Summary of Representations:**

The settlement of Caerphilly should be at the top of the settlement hierarchy as its own tier, and policy PS4 should be changed accordingly.

Response:

Whilst it is accepted that Caerphilly town is alone within the County Borough in terms of the explicit recognition of its sub-regional role, it is not considered that the settlement hierarchy, as presently constituted, is contrary to this, nor would it prevent Caerphilly from maximising its contribution in this regard.

The County Borough consists of a number of functional areas and, whilst it is conceded that different conclusions can be drawn in terms of their number and extent, depending on the factors being considered, this general point has long been accepted. The adopted LDP employs a strategy of three areas, each with a principal town, whilst the 2RLDP seeks to utilise five insofar as the setting of the hierarchy is concerned (although the principal towns proposed in the emerging plan are unchanged). It is considered that using this as a basis for the settlement hierarchy is equitable, allowing as it does a focus for development within each of the five areas whilst still ensuring that development can be targeted towards the more sustainable settlements located in each, as well as taking account of regionally important policy initiatives such as the South Wales Metro. None of this should prevent Caerphilly town from contributing to the development of the regional economy; from fulfilling its role in terms of facilitating regional and sub-regional interconnectivity; or from providing a location for a commensurate and sustainable quantum of development. Indeed, its status as the County Borough's largest town should ensure that it serves as the primary focus of development in local terms, in conjunction with the strategy proposed.

Action:

No amendment required.

3851 Object**Summary of Representations:**

Generally supported.

The status of Maesycwmmmer and Pontllanfraith as sustainable settlements in terms of delivering development is supported.

Response:

Comment in support is noted.

Action:

No amendment required.

3866 Support

Policy PS5: Climate Change

Summary of Representations:

Support for the inclusion of Policy PS5: Climate Change.

Response:

The comments made in support are noted.

Action:

No amendment required.

2325 Support

3074 Support

Summary of Representations:

Representations made in regard to specific candidate sites and the associated design elements which are supported by policy PS5 climate change.

Response:

These comments relate to Candidate Sites. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3168 Comment

3277 Comment

Summary of Representations:

Suggest including reference to retention / replacement of trees within developments.

Response:

Detailed policies will be included within the Deposit plan which will address the retention of trees.

Action:

No amendment required. Consider the provision of further policy guidance on the retention of trees at Deposit stage.

3735 Object

Summary of Representations:

Support in principle for climate change policies. However, we would like to make the following comments.

Using locally sourced materials cannot always be ensured due to certain materials only being available in certain geographical locations. It is not clear from the policy what the definition of local is and therefore the policy is imprecise.

Care must be taken to ensure that the climate change requirements do not overly burden the financial viability of development schemes when taking account of other policy requirements such as affordable housing.

Response:

The support in principle for Policy PS5 is noted.

The policy seeks to maximise the use of locally sourced materials, which allows for circumstances where such materials are not available. The policy will be further refined and developed as part of the preparation of the Deposit plan.

Whilst the issue of the financial implications of climate change requirements is acknowledged, addressing the causes of and mitigating the impacts of climate change are important national policy priorities. As such the climate change requirements are important and will need to be considered in the round with other policy requirements and the viability of proposed developments.

Action:

No amendment required. Consider the provision of further policy guidance on climate change at the Deposit stage.

3233 Comment

Summary of Representations:

We welcome Policy PS5 which relates to Climate Change. We consider that overall this policy could be strengthened in its wording, particularly regarding the phrases 'taken account of the following', 'maximize opportunities' and 'promote'. We suggest that these could be strengthened and go further in their intention to mitigate the impacts of climate change. For example, they could be amended to 'deliver', 'require' and/or 'ensure provision is made...', where appropriate.

Response:

The comments in regard to PS5 Climate Change are noted.

It is accepted that policies are better for being worded positively with wording that conveys certainty. However, this is a Strategy Policy, and it addresses the issue globally, not on a site-by-site basis, and there may be circumstances whether the elements won't apply. The wording of the policy reflects this.

In preparing the Deposit plan more detailed development control policies will be developed that will cover these issues and will provide more definitive policy context.

Action:

No amendment required. Consider the provision of further policy guidance on climate change at the Deposit stage.

3798 Comment

Summary of Representations:

We note that point 7 of Policy PS5 states "...the development has taken account of the following: The development is not in an area at risk of flooding". This goes beyond national planning policy, insofar as national policy allows some types of development in an area of flood risk, subject to the consequences of flooding being acceptably managed. You may wish to consider this further prior to the finalizing your strategic policies for the RLDP.

Response:

The comments in regards to point 7 of PS5 are noted. It is acknowledged that the criterion goes above and beyond national planning policy. This will be revised for the Deposit plan.

Action:

Revise criterion 7 of Policy PS5 for the Deposit stage.

3799 Comment

Summary of Representations:

Point 8 of Policy PS5 refers to managing green infrastructure, stating "proposals promote resilience through maximizing the opportunities for enhancing green infrastructure as part of the design of the development". We consider this point could be stronger and clearer in terms of what is expected from developers. It should deliver 'increased resilience', while 'maximizing opportunities to create new green infrastructure and maintain and enhance existing green infrastructure'.

This would better reflect national policy, including Future Wales Policy 9. That said, you may wish to consider whether this element of the policy is better placed under Policy PS8: Green and Blue Infrastructure.

Response:

The comments made in regard to criterion 8 of PS5 climate change are noted. It is considered that retention of the reference to “promote” resilience will allow for greater flexibility in terms of assessing the merits of proposals, whilst still requiring developers to have regard for the need to take account of such requirements.

Criterion 8 will be amended to include reference to creation of new infrastructure, as well as maintenance and enhancement.

Action:

Amend the relevant part of criterion 8 to read “maximising the opportunities for creation, maintenance and enhancement of green infrastructure”.

Provide further policy guidance on green and blue infrastructure as part of climate change at the Deposit stage.

3800 Comment**Summary of Representations:**

Supportive of PS5 - however in order to encourage developments which will help the borough achieve net zero targets it would be useful to proactively encourage development. A map identifying brownfield sites, near potential hydro or mine water heat schemes would be a useful starting tool.

Response:

The support for policy PS5 climate change is noted.

The Council will seek to allocate brownfield sites where they are viable, deliverable and in sustainable locations.

In April 2024 The Coal Authority published “Caerphilly County Borough Council: Mine Water Heat Opportunities”, which is a strategic assessment of the opportunities for mine water heating across the county borough.

The Council is investigating potential opportunities for both mine water and hydro heat schemes.

The Deposit plan will include any schemes that have come forward at that time.

Action:

No amendment required.

2223 Comment

Decarbonisation - Renewable Energy Generation

Summary of Representations:

Support for renewable energy generation as part of decarbonisation.

Response:

The comments made in support are noted.

Action:

No amendment required.

2100 Support

Policy PS6: Renewable Energy Generation

Summary of Representations:

A map indicating brownfield sites which are near to hydro and mine water heat potential would be a useful tool to actively encourage these types of developments.

Response:

The Council will seek to allocate brownfield sites where they are viable, deliverable and in sustainable locations.

In April 2024 The Coal Authority published “Caerphilly County Borough Council: Mine Water Heat Opportunities”, which is a strategic assessment of the opportunities for mine water heating across the county borough.

The Council is investigating potential opportunities for both mine water and hydro heat schemes.

The Deposit plan will include any schemes that have come forward at that time.

Action:

No amendment required.

2224 Comment

Policy PS7: Placemaking Principles

Summary of Representations:

PS7 is supported.

Response:

The comments made in support of PS7 are noted.

Action:

No amendment required.

3647 Support**Summary of Representations:**

The policy should incorporate design as a tool to deliver attractive, stimulating and safe places to live and work.

Response:

Comments in relation to PS7 and crime prevention are noted. Proposals for developments will be assessed against this policy in order to create safe places to live and work, although it is maintained that design considerations are implicitly included within the policy as written. The concept of design will be considered for explicit reference within the Deposit plan.

Action:

No amendment required. Comments noted for Deposit Stage.

2945 Comment**Summary of Representations:**

The retail development of former Stagecoach Depot, Penmaen Industrial Estate will enhance well-being in the County Borough through the protection and enhancement of the economic, social, environmental and cultural aspects of the County Borough and contribute towards the listed strategic placemaking principles.

Response:

The comments made in support are noted.

Action:

No amendment required.

3163 Comment**Summary of Representations:**

Suggest includes focus on 'safe, attractive, durable and well managed' built environment.

Suggest includes reference to 'access to food'.

Response:

It is considered that the policy as written includes an implicit recognition of the qualities suggested.

Action:

No amendment required.

3736 Object

Summary of Representations:

Increasing population density, with development built at urban densities that can support public transport and local facilities is supported in principle but we would note that this should not be a blanket approach as there may be valid reasons why a low or medium density would be appropriate such as when there are heritage or green infrastructure constraints or where there is a need for a particular type of housing such as homes for the elderly.

Response:

The comments made in support are noted. The comments regarding a 'blanket approach' are also noted.

Action:

No amendment required.

3234 Comment

Summary of Representations:

Policy PS7 should be amended to include a criteria related to development and underground assets.

Response:

Detailed site-specific considerations relate to the candidate site assessment process and the process of allocating sites for specific uses, including the location of potential constraints, is a matter for the Deposit plan.

Policy PS7 is concerned with general principles underpinning the concept of placemaking. The suggested amendment relates to more detailed site-specific factors. Consideration could be given to the inclusion of such policy requirements as part of the preparation of the Deposit plan.

Action:

No amendment required.

2827 Object

Nature Based – Green and Blue Infrastructure

Summary of Representations:

This statement is welcome, there is a need for more clarity to implement Future Wales, Policy 9. The nature hierarchy should be adopted for all developments to avoid, and then compensate for unavoidable loss. This should include a clear statement from the Council that applies to developers. Suggestion to amend the strategy as follows "Developers will need to show that their proposals avoid damaging biodiversity and ecosystem functions where possible and if not, provide opportunities to maximize green and blue infrastructure as part of any development proposals to deliver net benefit for biodiversity."

Response:

The Council will seek to maintain and enhance biodiversity and improve ecological resilience in line with Policy 9: Resilient Ecological Networks and Green Infrastructure within Future Wales. This Nature Based approach is set out in the Council's Green Infrastructure Assessment (GIA) which underpins the policy framework contained within the plan. This will be further updated for the Deposit plan which will include additional evidence and mapping in relation to resilient ecological systems and green infrastructure. More detailed policies will be included within the Deposit plan. In addition, the Step-Wise approach and DECCA framework will be applied to all development proposals to ensure that net benefit is delivered for the County Borough in line with the Council's biodiversity duty.

Action:

No amendment required. Provide further policy guidance at Deposit stage.

3116 Object

Summary of Representations:

The paragraph for Green and Blue Infrastructure is very welcome, but please consider building-dependent wildlife such as red-listed bird species which inhabit buildings in Caerphilly. Therefore, please add: Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, in accordance with best practice guidance. In addition, existing nest sites for building-dependent species such as swifts and house martins should be protected.

Response:

Further detailed policies for biodiversity as part of green and blue infrastructure will be outlined at the Deposit stage of the plan. The protection of individual species will be outlined within the Green Infrastructure Assessment. The suggested policy

amendments regarding specific bird species is considered too detailed for a strategic level policy within the development plan.

Action:

No amendment required.

3218 Comment

Policy PS8: Green and Blue Infrastructure

Summary of Representations:

Support for Policy PS8 Green and Blue Infrastructure.

Response:

The comments made in support are noted.

Action:

No amendment required.

2326 Support

3134 Support

Summary of Representations:

Comments made in relation to green and blue infrastructure considerations and other supporting documents for the stagecoach depot in Penmaen which has been submitted as part of the third call for candidate sites.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process

Action:

No amendment required.

3164 Comment

Summary of Representations:

Request for the land west of Riverbank Court to be protected as open space.

Response:

More detailed policies for the protection of formal and informal areas of open space will be included as part of the Deposit plan. These will be informed by the Councils Green Infrastructure Assessment (GIA).

Action:

No amendment required.

3205 Comment**Summary of Representations:**

It is the view of Welsh Government that the Authority has so far demonstrated a reasonable and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered at this stage.

Response:

The Council acknowledges the comments made by Welsh Government in regards to BMV land and will continue to develop its Green Infrastructure Assessment (GIA) to protect the best and most versatile areas of agricultural land.

Action:

No amendment required.

3780 Comment**Summary of Representations:**

Policy PS8 would benefit from including clear reference to the protection of biodiversity, including designated areas such as SSSIs. The emphasis on enhancement risks overlooking the importance of protecting what is already there.

Response:

Policy PS8 as a strategic policy outlines the key functions which must be considered as part of maintaining and enhancing green and blue infrastructure assets. More detailed policies for each function will be set out within the Deposit plan.

Statutory designations such as SSSIs, and the protection afforded to them, exist under a separate regulatory framework. While it is important for the plan to have regard to them, putting in place specific policy requirements would be superfluous.

Action:

No amendment required. However, further consideration will be given to biodiversity when formulating the Deposit plans policy framework.

2537 Comment

Summary of Representations:

Paragraph 7.13 provides the reasoned justification for this policy and we would advise that the DECCA framework is referenced within this section. This would provide a link to national policy and ensure developers use the framework and attributes to evaluate ecosystem resilience within their site and development proposals.

We also advise that the reasoned justification reflects the fact that multi-functional green infrastructure and spaces may not always be compatible with the nature conservation requirements, for example certain habitats and/or protected sites will require dark corridors, whereas as green spaces or active travel routes often require lighting. Furthermore, it is important to highlight the potential opportunities for delivering Resilient Ecological Networks (RENs) as part of this policy.

Response:

Further detailed policies in regards to green and blue infrastructure will be outlined at the Deposit stage. However, the Council acknowledges the advice from NRW to include the DECCA framework within its policy framework. Further consideration will be given to this strategic policy for the Deposit stage.

Action:

No amendment required. Provide further policy guidance on green and blue infrastructure at the Deposit stage.

3803 Comment

Summary of Representations:

The Southeast Area Statement is also guiding the development of Resilient Ecological Networks (REN) spatial mapping in partnership with local and regional stakeholders. Developing RENs for Gwent is the main mechanism for delivering the Statement's theme 'Linking our Landscapes' (see Green Infrastructure Assessment advice below). This is being undertaken through the lens of the Area Statement Landscape Profiles. We are working in collaboration with Gwent Green Grid to deliver RENs in Gwent, and with other partners such as the Living Levels Partnership in the different Landscape Profile areas. The RLDP should look to incorporate this evidence base, ensuring that it influences site selection and design.

Response:

The Council has developed its Green Infrastructure Assessment in line with Guidance Note 42: GIAs produced by NRW, which takes into account the South East Wales Area Statement. As part of this work the GIA has set out a strategic level baseline review of green and blue infrastructure assets within the County Borough. The Council will continue to work closely with external stakeholders to develop the

evidence base further for the Deposit stage of the plan, which will include incorporating new and updated datasets regarding RENs as and when they become available.

Action:

No amendment required.

3785 Comment

Summary of Representations:

Overall, while supporting the principle of this policy, we consider it could be strengthened in its wording and provide further guidance and details within its reasoned justification. We consider the wording "...must maintain, and enhance green and blue infrastructure assets" aligns well with national policy and is sufficiently strong. However, we would recommend a stronger word than 'promote', for example 'deliver' or 'ensure'. In addition, as per our comment above, reference to creating new blue and green infrastructure would go some way in addressing the Plan's issues, aims and objectives.

Response:

The support from NRW in principle for this policy is noted.

It is acknowledged that policies are better for being worded positively with wording that conveys certainty. However, this is a Strategy Policy and it addresses the issue globally, not on a site-by-site basis, and there may be circumstances whether the elements won't apply. The wording of the policy reflects this.

In preparing the Deposit plan more detailed development control policies will be developed that will cover these issues and will provide more definitive policy context.

Action:

No amendment required. Provide further policy guidance on green and blue infrastructure at the Deposit stage.

3801 Comment

Policy PS8: Green and Blue Infrastructure

Summary of Representations:

BMV is covered under the Stage 2 assessment process of Candidate Sites (D22) by use of a RAG status. Some candidate sites have been discounted at this stage due to BMV. Two sites progressing are noted to contain BMV, and surveys have been commissioned which is welcome. The Candidate site Guidance note for site promoters reflects the need for survey if BMV is identified the predictive map. This could be further supplemented by referring to the published department Predictive Map Guidance Note.

Response:

The comments in regards to BMV land and the candidate sites process are noted.

Action:

No amendment required.

3777 Comment**Summary of Representations:**

As part of the key functions of green infrastructure, we consider its long-term provision, management and adaptive design would be important to highlight within this policy. For example, consideration of ongoing management should be referenced. Most semi natural habitats that would contribute to ecosystems resilience, RENS or net benefit for biodiversity require ongoing management. This is often the most difficult element of delivering biodiversity enhancement. We advise that this is referenced within the reasoned justification to ensure that developers are fully aware at an early stage of the likely need for an ongoing management commitment.

Response:

Further detailed policies in regards to green and blue infrastructure will be outlined at the Deposit stage. However, the Council acknowledges the advice from NRW regarding the importance of site management within the policy framework. Further consideration will be given to this strategic policy for the Deposit stage

Action:

No amendment required. Provide further policy guidance on green and blue infrastructure at Deposit stage.

3802 Comment**Summary of Representations:**

Disappointing to see many of the candidate sites are being proposed on green spaces rather than prioritising the use of brownfield sites. Prioritising town centre developments means even more people who will have less access to green spaces which are so important for health and well being. Still issues with sewerage affecting both green and blue infrastructure in Ystrad Mynach one of the priority sites for development.

Response:

Whilst a matter for the Deposit plan, the identification of specific sites will adhere to the approach taken by national policy with regard to the prioritisation of previously developed land.

Whilst there are a number of brownfield sites across the County Borough, these sites generally require significant remediation and reclamation before development can take place and this means that the development of some of these sites may not be viable and so cannot be included in the emerging plan unless mechanisms to unlock them have been identified and can be achieved. The Council will seek to allocate brownfield sites where they are viable, deliverable and in sustainable locations.

The Council recognises the importance of green spaces for health and well-being and will seek to protect important areas of formal and informal open space within the plan. More detailed policies regarding water management and blue infrastructure will be included at the Deposit stage. The Council will continue to liaise with the statutory undertakers to inform its policy framework.

Action:

No amendment required. Provide further policy guidance on green and blue infrastructure at Deposit stage.

2225 Comment

Employment & Tourism

Summary of Representations:

Beautiful iconic landscapes are being decimated to build giant renewable energy complexes on uplands. Tourists don't want to visit Wales to see a giant windfarm. The giant interlinked renewable energy development on Mynydd Maen will be visible from the Severn Crossing.

Cwmcarn Forest Drive, and the views from Twmbarlwm will be permanently destroyed. The tourism industry will suffer badly. Renewable energy generation needs to be small and local

Response:

Detailed policies regarding particular land uses will be included within the Deposit plan. All proposals will be required to adhere to the renewable energy position set out in Future Wales, as well as national policy.

Action:

No amendment required.

2101 Comment

Policy PS9: Managing Employment Growth

Summary of Representations:

PS9 supported although the capability of infrastructure to service new employment allocations will be assessed once potential demands are known.

Response:

Comment in support is noted.

Action:

No amendment required.

2327 Support

Summary of Representations:

The 44.5 ha of employment land proposed is too simplistic. Provision needs to be in the correct place. Instead, each community should be assessed using the environmental capacity method.

Response:

The employment land requirement has been arrived at by means of the forecasting process set out in Planning Policy Wales and TAN 23, and aligns with growth scenario J which forms the basis for the 2RLDP's strategic approach.

The allocation of sites will be a matter for the Deposit plan, but such allocations will adhere to the identified role and function of settlements, and their respective positions within the settlement hierarchy.

Action:

No amendment required.

2341 Object

Summary of Representations:

The larger than Local study raises concerns at further employment in Caerphilly causing congestion difficulties and suggests that surplus land elsewhere in the sub region would meet business demand satisfactorily. Additional car traffic is not in keeping with climate change mitigation policies and objectives.

Caerphilly Basin is not the right location for additional employment land.

Response:

The Larger than Local study recommends that 70.4 ha of employment land be allocated in Caerphilly to take account of its share of sub-regional demand, having regard for capacity issues and spatial dynamics between the constituent authorities. The Employment Land Review, undertaken subsequently, has refined this to a requirement for 44.5 ha (including flexibility buffer).

As regards car travel, the 2RLDP strategy explicitly seeks to locate development in conjunction with Metro routes/nodes, and in proximity to town centres, to promote modal shift.

Action:

No amendment required.

2968 Comment**Summary of Representations:**

Catnic site should be safeguarded for employment use.

Response:

The allocation and safeguarding of specific sites will be a matter for the Deposit plan.

Action:

No amendment required.

3056 Comment**Summary of Representations:**

The level of employment development is supported in sustainable locations, but sites should not be reallocated for housing.

Response:

Comment in support of sustainably located employment development is noted.

The allocation of specific sites will be a matter for the Deposit plan, but will be undertaken in compliance with national policy (including that relating to the release of employment land for alternative uses) and the underlying principles of the 2RLDP strategy.

Action:

No amendment required.

3241 Comment

Summary of Representations:

The LDP should promote economic activity, particularly in the north of the County Borough.

Response:

The premise of the comment is noted.

Whilst the allocation and safeguarding of specific sites will be a matter for the Deposit plan, it is likely that there will continue to be sites allocated/safeguarded in Rhymney for employment purposes. It is also important to recognise that the 2RLDP will exist within a regional context, and in this regard the north of the County Borough will benefit from strong interconnectivity due to the A465 dualling and improvements to network capacity and frequency brought about by the South Wales Metro.

Action:

No amendment required.

3632 Object

Summary of Representations:

The Council must ensure that employment sites are deliverable and explain how they are sustainably located and how they relate to proposed housing allocations.

Response:

The allocation of sites will be a matter for the Deposit plan, but the requirements of national policy in this regard, plus the guidance set out in the Development Plans Manual, are noted.

Action:

No amendment required.

3768 Comment

Policy PS10: Managing Tourism Growth

Summary of Representations:

PS10, Council will seek to expand and enhance the tourist potential of the Borough through:

Identification of tourism-appropriate land

- Facilitating development of visitor accommodation in appropriate locations;
- Improving accessibility to visitor attractions through sustainable transport and active travel;
- The protection, enhancement of the Borough's natural, historic assets that give the Borough its unique identity

RCPT agree that the 2RLDP should include policies that demonstrate the role sustainably accessed heritage has in contributing to managing tourism growth. The 2RLDP should encourage sustainable benefit from our heritage for current and future generations, including development of skills.

Response:

The comments are noted in regard to this policy. Detailed policies in respect of heritage and tourism will be a matter for the Deposit plan.

Action:

No amendment required.

2538 Comment

Housing

Summary of Representations:

Generally supportive - however it would have been good to ringfence areas of land which would be suitable for self build or community owned housing developments.

Response:

The comment in support is noted. The allocation of specific sites, and the formulation of more detailed policies, will be a matter for the Deposit plan. Consideration will be given to the development and inclusion of policies that seek to encourage smaller scale housebuilders, as well as alternative delivery mechanisms.

Action:

No amendment required.

Consider further policy guidance on specialist housing at Deposit stage.

2226 Comment

Policy PS11: Managing Housing Growth

Summary of Representations:

Once sites are identified, it will be possible to advise whether there is sufficient capacity within the water and sewerage networks to accommodate the growth proposed.

Response:

As part of Deposit plan preparation, the Council will engage with Dwr Cymru Welsh Water to ensure that there is sufficient capacity within the water and sewerage networks to accommodate the growth proposed.

Action:

No amendment required.

Continue to engage with Dwr Cymru Welsh Water as part of the Deposit plan preparation.

2328 Comment

Summary of Representations:

The 10% flexibility allowance should be revisited.

A 'non-delivery allowance' is factored into the land bank.

Would like further evidence regarding provision of windfall sites. Careful consideration needs to be given to the windfall allowance.

Response:

Evidence Base Documents EB5 Housing Land Supply and Affordable Housing Target and EB5.1 Housing Land Supply and Affordable Housing Target (Addendum) assess the components of housing supply, including the assumptions for windfall sites and provide justifications for the assumptions used.

With regards to flexibility, the Development Plan Manual (DPM) indicates that the level of the flexibility allowance is a matter for each LPA to determine based on local issues, but the starting point for such considerations could be a 10% flexibility allowance. Variation from this should be robustly evidenced. Whilst the Adopted LDP incorporated an over- allocation of 19% above the housing requirement, a key component of the strategy of the Adopted LDP was to target development to the Heads of the Valleys Regeneration Area to diversify the housing stock and retain and attract people to the area. Viability is more challenging in this part of the County Borough, and the higher flexibility allowance in the Adopted LDP was reflective of the greater uncertainty around the delivery of housing sites.

There has since been a significant change in national planning policy in respect of the evidence required to demonstrate the deliverability and viability of allocations and therefore only sites that are realistically likely to come forward in the plan period will be allocated in the plan. Having regard for this, it is considered appropriate to apply a 10% flexibility allowance to the housing requirement, rather than the higher level included in the Adopted LDP.

With regards to discounting/non delivery allowance, the DPM (Table 18) states that “a ‘non-delivery allowance’ is factored into the land bank; discounting a proportion of the land bank based on local evidence. This may not be appropriate for all LPAs, but relevant for LPAs with a large number of land bank sites, not those with just a few sites, or in areas where the land bank is made up of numerous small sites which take a long time to complete. To be clear, a land bank non-delivery allowance is separate to the flexibility allowance (i.e. 10%) which is applied to the plan as a whole.” The non-delivery rate has ranged between 20-50% in other areas in Wales, depending on local circumstances.

Sites with extant planning permission are taken into account when arriving at the housing land requirement. However, in calculating the components of housing supply, only sites with planning permission that are considered to be realistically likely to come forward during the plan period have been considered. These sites have been considered in consultation with the Housing Stakeholder Group which comprises representatives from the housebuilding industry.

The original Preferred Strategy calculation includes a non-delivery allowance of 25% which is within the range identified in the DPM. However, the Council will recalculate the Components of Housing Supply to reflect the latest available data, and ensure an appropriate non-delivery allowance is factored into the land bank, as part of the evidence base for the Deposit plan.

Action:

No amendment required.

Review the Components of Housing Supply to reflect latest available data. Review the land bank sites with the housing stakeholder group.

Consider an appropriate non-delivery rate for the Deposit plan.

3200 Object

3643 Comment

2330 Comment

2331 Comment

3235 Object

3602 Comment

3852 Object

4046 Object

Summary of Representations:

Scenario H might be more appropriate as a basis for the housing land requirement, due to the County Borough's location within the National Growth Area.

A minimum flexibility allowance of 15% should be used,

Response:

The evidence base in respect of the 2RLDP's proposed level of growth, and the associated housing land requirement, is set out in Evidence Base Document EB4 - Population and Housing Growth Options. A series of growth scenarios were considered which used the 2018-based Welsh Government population and household projections as their starting point. Scenario J was ultimately chosen as the preferred scenario as it aims for a sufficient increase in the working age population, over and above that set out in the projections, to support the Council and the Cardiff Capital Region (CCR) jobs target for South East Wales and represents a mid-point between the Adopted LDP's annual housing requirement and the past build rates figure.

With regards to flexibility, the Development Plan Manual (DPM) indicates that the level of the flexibility allowance is a matter for each LPA to determine based on local issues, but the starting point for such considerations could be a 10% flexibility allowance. Variation from this should be robustly evidenced. Whilst the Adopted LDP incorporated an over- allocation of 19% above the housing requirement, a key component of the strategy of the Adopted LDP was to target development to the Heads of the Valleys Regeneration Area to diversify the housing stock and retain and attract people to the area. Viability is more challenging in this part of the County Borough, and the higher flexibility allowance in the Adopted LDP was reflective of the greater uncertainty around the delivery of housing sites.

There has since been a significant change in national planning policy in respect of the evidence required to demonstrate the deliverability and viability of allocations and therefore only sites that are realistically likely to come forward in the plan period will

be allocated in the plan. Having regard for this, it is considered appropriate to apply a 10% flexibility allowance to the housing requirement, rather than the higher level included in the Adopted LDP.

Action:

No amendment required.

3874 Comment

3598 Comment

Summary of Representations:

Support for the level of growth proposed.

Response:

The comments made in support are noted.

Action:

No amendment required.

3280 Comment

3337 Support

Summary of Representations:

Finding allocations for nearly 3000 new homes that meet the requirements of the other ambitions, including them being close to employment opportunities whilst still following the 'town centre first' precept seems unachievable.

Response:

The Council acknowledges that it will be a challenge to identify new sites for allocation. However, the Candidate Sites that are currently being considered for inclusion in the 2RLDP will be the subject of a locational assessment that will assess their location in terms of proximity and access to the Principal and Local town centres and the Metro transport nodes. Those sites that are better located in these terms will be prioritised over sites that are more distantly located. Consequently, the sites that will be identified in the Deposit plan will be the most sustainably located sites for allocation.

Action:

No amendment required.

2365 Comment

Summary of Representations:

Concern over the lack of housing solutions that address homelessness.

Include a focus on specialist and accessible housing to meet the needs of older and other people with specialised accommodation needs.

Response:

The allocation of affordable housing is undertaken in line with the Council's Common Allocations Policy. However, the Council will consider including relevant information on the levels and provision

of homelessness services.

The Council recognises the need to support the delivery of housing for older people and those with specialised accommodation needs and further policy guidance on specialist housing will be provided at Deposit stage.

Action:

No Amendment required.

Provide further policy guidance on specialist housing at Deposit stage.

3673 Object

3737 Object

Summary of Representations:

The housing growth supports and is focused on Caerphilly County's main sustainable settlements and whilst none are near the boundary with Torfaen, there is a need to understand the regional picture and context in relation to housing growth.

Response:

The Council will continue to work with the other local authorities in the region to build on the evidence provided in Evidence Base Document EB21: Regional Assessment of Future Growth and Migration for the Cardiff Capital Region as it moves forward to Deposit. This work will demonstrate how the 2RLDP strategy has been developed within a wider regional context and how its spatial strategy relates to the rest of the region.

Action:

No amendment required.

3816 Comment

Policy PS12: Affordable Housing Target

Summary of Representations:

Despite the 25% affordable housing target, this may not be sufficient to meet the needs of the community. More targeted efforts are needed.

Response:

The affordable housing targets have yet to be determined. The targets will have regard to site viability and housing need as identified by the Local Housing Market Assessment.

Action:

No amendment required.

Provide further policy guidance on affordable housing and Include the updated LHMA as part of the evidence base for the Deposit plan.

3675 Object

Summary of Representations:

Need to ensure strong policy on affordable/social housing inclusion in new developments to ensure we meet this target. Provision of this target is probably more important than the overall housing provision target.

We require a high number of social/affordable housing so require very robust social/affordable housing clauses to ensure that our housing targets and community needs are met.

2018 LHMA is not the the new type of LHMA required by Welsh Government. Unclear as to the scale of affordable housing need over the plan period.

Response:

The affordable housing target will be reviewed as part of the preparation of the Deposit plan. It is intended that the LHMA, prepared using the latest methodology, will be included as part of the evidence base for the Deposit plan and the overall affordable housing target will therefore be revised for the Deposit LDP to take account of this as well as additional housing sites to be identified and to reflect updated viability evidence.

The target will reflect what the planning system can achieve. However, higher levels of affordable housing can be delivered through the Council's and RSL's own housebuilding programme.

Action:

No amendment required.

Provide further policy guidance on affordable housing and Include the updated LHMA as part of the evidence base for the Deposit plan.

3767 Comment

2227 Comment

2366 Comment

2908 Comment

3336 Comment

Summary of Representations:

Support the provision of housing and considers the redevelopment of existing Lidl in Risca could deliver housing, including affordable housing within a town centre location on previously developed land.

Response:

The comments made in support are noted.

Action:

No amendment required.

3282 Comment

Policy PS13: Sustainable Transport Hierarchy**Summary of Representations:**

fully support

Response:

The comments made in support are noted.

Action:

No amendment required.

3212 Support

Policy PS14: Modal Shift

Summary of Representations:

The aims of the plan and CCBC's actions appear contradictory. Progress against the active travel plans is painfully slow, and bus services are under threat from funding cuts.

Response:

The aims of the plan adhere to the approach required by Planning Policy Wales, as well as related areas of public policy and complementary initiatives. The strategy explicitly seeks to take account of the Metro proposals as a basis for policy formulation.

Action:

No amendment required.

2367 Support

Summary of Representations:

CCBC should strengthen countryside and active-travel policies and the presumption against 'unsustainably accessed development within the Green Belt'.

Response:

Suggestions noted. Whilst the formulation of detailed policies will be a matter for the Deposit plan, it will adhere to national policy and have regard to related areas of legislative and regulatory oversight in respect of environmental protection and modal shift.

Delineation of the green belt boundary is a matter for the Strategic Development Plan.

Action:

No amendment required.

2539 Comment

Summary of Representations:

I fully support this policy and hope to see more effective implementation than previously. The location of land for housing and employment will be crucial to this.

Response:

The comments made in support are noted.

Action:

No amendment required.

3137 Support**Summary of Representations:**

CCBC has taken amenities away from residents, who now have to travel farther than they once did (to jobs, shops and entertainment venues in Cardiff and Cwmbran, for example).

Response:

The approach taken by the strategy seeks to ensure that the spatial pattern of development adheres to the settlement hierarchy set out, and is in accordance with the identified role and function of specific settlements.

The strategy explicitly seeks to take account of the Metro proposals as a basis for policy formulation, which seek to increase accessibility and connectivity.

Action:

No amendment required.

3155 Object**Summary of Representations:**

There is a lack of specific plans for car use and traffic congestion mitigation, which is concerning given the importance of sustainable transport options.

Response:

The Regional Transport Plan (for the Cardiff Capital Region), which is still in draft form, will consider these issues in more detail. In terms of detailed policies and the identification of specific sites, these will be a matter for the Deposit plan.

The approach taken by the strategy seeks to ensure that the spatial pattern of development adheres to the settlement hierarchy set out, and is in accordance with the identified role and function of specific settlements.

The strategy explicitly seeks to take account of the Metro proposals as a basis for policy formulation, which seek to increase accessibility and connectivity.

The overall objective of these considerations is to reduce the need to travel by car and to encourage modal shift, including use of active travel.

Action:

No amendment required.

3676 Object**Policy PS15: Transport Improvement****Summary of Representations:**

Without these improvements, modal shift simply isn't possible.

Response:

The comments made in support are noted.

Action:

No amendment required.

2368 Support**Summary of Representations:**

Where development is likely to promote the use of the rail network, developers may have to contribute to station improvements (parking for people with disabilities, additional bike parking, improvements to wayfinding, ticket offices, station forecourts, and so on).

Response:

Noted. The use of planning obligations is subject to specific regulatory and legislative oversight and will be considered on a site by site basis.

Action:

No amendment required.

3033 Comment**Policy PS16: Safeguarding Former Rail Lines****Summary of Representations:**

Without this provision modal shift simply isn't possible.

Response:

The comments made in support are noted.

Action:

No amendment required.

2369 Support**Summary of Representations:**

Fully support

Response:

The comments made in support are noted.

Action:

No amendment required.

3138 Support**Policy PS17: Protecting Strategic Transport Improvement Routes****Summary of Representations:**

This is a very ambitious policy.

The Caerphilly/machen/newport route should be actively protected and supported, and should include a cycleway. Opening this route will allow for the development of the Waterloo site, which is currently not connected to any sustainable transport links.

Response:

The comments made in support are noted. The formulation of detailed policies, and the identification of sites, will be a matter for the Deposit plan.

Action:

No amendment required.

2370 Support**Summary of Representations:**

Fully support.

Response:

The comments made in support are noted.

Action:

No amendment required.

3139 Support**Policy PS19: Hierarchy of Commercial Centres****Summary of Representations:**

Consideration should be given to moving Rhymney up the hierarchy of commercial centres.

Response:

The collation and review of evidence is an iterative and continual process undertaken in parallel with plan preparation. However, the approach taken with regard to the identification of commercial centres is justified by the exercise set out in the Evidence Base Document EB17 Retail Capacity Study.

Action:

No amendment required.

2371 Object**Summary of Representations:**

Lack of spending on our town centres, which sometimes look shabby and unappealing. Treorchy has a successful town centre. Local people are proud of it.

CCBC should take a similar approach to its main town centres.

Response:

The 2RLDP will promote a mix of compatible uses, including retail, in commercial centres, as required by national policy and the 'town centre first' approach enshrined in Future Wales.

Detailed policies and the identification of specific sites and designations will be a matter for the Deposit plan.

Action:

No amendment required.

3160 Comment

Summary of Representations:

Blackwood Gate Retail Park should not have 'retail centre' status, because it does not have the diverse range of services required by PPW and TAN 4 (see paragraph 4.6).

Response:

While TAN 4 states that out of centre retail parks should not normally be included in local hierarchies. National policy requires the categorisation of centres (on the basis of their range of uses or catchment areas, for example) and permits the assessment of such sites against locally-set criteria on the range and choice of services and the scale and nature of the retail floorspace. This allows consideration of whether retail parks have matured into retail and commercial centres in their own right, offering the same level of service provision and being as accessible as traditional centres. There is also a need to distinguish between higher and lower order centres.

Blackwood Gate Retail Park (BGRP) is an established shopping centre, and it is within walking distance of the town centre and bus stops that receive frequent services. Along with Gallagher Retail Park, Caerphilly, it constitutes a clearly established retail centre of a higher order nature, and should be categorised as such. While out of centre, these sites are not out of, or edge of, settlement and clearly benefit from sustainable locations within close proximity to public transport. Certainly, they have stronger credentials from a retail perspective than the 'other defined/neighbourhood centres' listed and should continue to be regarded as such. Their position within the hierarchy, relative to the other categories listed, is considered appropriate.

Action:

No amendment required.

3166 Object

Summary of Representations:

-Risca/Pontymister should remain a 'principal town centre' in the 2RLDP.

-The town centre's boundary should be extended to include the former Bird Factory site.

Response:

The identification of sites and delineation of boundaries will be a matter for the Deposit plan. The designation of particular retail centres can be reassessed in conjunction with a boundary review.

Action:

No amendment required.

Town centre boundaries to be reviewed for Deposit stage. Reassess designation of Risca-Pontymister if justified.

3283 Object**Summary of Representations:**

Whilst the hierarchy is sensible for larger proposals, consideration needs to be given to the accommodation of smaller commercial schemes in sustainable locations.

Response:

The proposed hierarchy of commercial centres does not rule out small commercial schemes outside the defined centres. Detailed policies and the identification of sites and designations will be a matter for the Deposit plan.

Action:

No amendment required.

3867 Comment**Policy PS20: Gypsy and Traveller Accommodation****Summary of Representations:**

We have a real issue with housing in the area, underused grey field sites, and yet all these proposals seem to be on green field sites. This is the icing on the cake that we need to provide areas for Gypsy and Travellers. People who rarely come from the area or contribute to it. If anything a grey field site should be sufficient for this to happen. It would be absolutely wrong to prioritize this ahead of sustainable housing for local residents.

Gypsies and travellers need to pay for services provided.

Response:

The Housing (Wales) Act 2014 requires the Council to carry out an assessment of the accommodation needs of Gypsies and Travellers within its area by way of a Gypsy and Traveller Accommodation Assessment (GTAA). Where a need is identified, the Housing (Wales) Act 2014 and the Mobile Homes (Wales) Act 2013 direct that the local authority must exercise its powers so far as may be necessary to meet those needs and Planning Policy Wales (Edition 12 February 2024) paragraph 4.2.36 directs that where a need is identified within a GTAA, the planning authority should allocate sufficient sites within their development plan (RLDP) to ensure that this need can be met. The Council is therefore statutorily required to consider and provide for gypsy and travellers when a need is identified within the GTAA.

Action:

No amendment required.

2154 Object**3165 Comment****Policy PS21: Minerals****Summary of Representations:**

Tarmac support the overall aim of this policy and welcome the inclusion of safeguarding mineral resource, a requirement to maintain a minimum 10-year land bank, reference to the efficient use of high-quality mineral and safeguarding of mineral infrastructure within the emerging Local Development Plan. To ensure the emerging LDP adequately protects and promotes the extraction of HSA, a clear distinction should be made between HSA and general construction-grade aggregates. This ensures that policies acknowledge the difference between these resources and reinforces the national importance of HSA as advocated in PPW.

Response:

The policy, as drafted, refers to the efficient and appropriate use of high-quality minerals. The importance of HSA is therefore recognised, and balanced against the need to consider potential constraints.

Action:

No amendment required.

3268 Comment**Summary of Representations:**

As referenced in our response of November 2022, the Council should include reference to the HSA in para. 7.35 (also known as high PSV aggregate) and ensure such materials remain available in the national interest. In addition, whilst Policy PS6 makes reference to local materials, this should also be reflected in Policy PS21.

Response:

PPW affords significant weight to the need for HSA aggregates and requires potential HSA resources to be identified. However, it is considered that this can be accomplished within the existing terms of the policy. There is no requirement for a 10-year land bank of HSA aggregates as distinct from the land bank required for crushed rock. Therefore, it is considered that any reference to HSA within the supporting text is unnecessary.

A reference to local materials within Policy PS21 would duplicate this element of Policy PS5.

Action:

No amendment required.

3304 Object**Summary of Representations:**

The Council needs to consider the implications of the February 2042 expiry date for several extant planning permissions in its evidence base and ensure there is policy support in the plan to maintain supply and production capacity.

Response:

Comment is noted.

Action:

No amendment required.

3305 Comment**Summary of Representations:**

Amend the wording of Policy PS22 to read:

“The Council will contribute to the local, regional and national demand for a continuous supply of minerals by:

A Safeguarding known resources of sand and gravel, crushed rock and minerals infrastructure

B Maintaining a minimum 10-year land bank of permitted aggregate reserves throughout the plan period

C. Maintaining a minimum 10-year land bank of nationally

important high specification aggregate reserves throughout the plan period

D. Maintaining the supply of local building stone

E. Encouraging the efficient and appropriate use of high-quality minerals safeguarding minerals infrastructure and maximising the potential for the use of secondary and recycled aggregates as an alternative to primary land won resources.

Response:

The proposed amendment to Policy PS22 (PS21 in the up-to-date version) concerns specific reference being made to the safeguarding of minerals infrastructure, as well as minerals themselves; the maintenance of HSA reserves; and the supply of local

construction materials. PPW requires that minerals infrastructure is safeguarded and therefore the suggested wording of criterion 1 is considered acceptable.

PPW affords significant weight to the need for HSA aggregates and requires potential HSA resources to be identified. However, it is considered that this can be accomplished within the existing terms of the policy. There is no requirement for a 10-year land bank of HSA aggregates as distinct from the land bank required for crushed rock. Therefore, it is considered that the inclusion of proposed criterion 3 is unnecessary.

Proposed criterion 4 concerning the supply of local construction materials does not take account of the fact that the aggregates market operates on a regional or national basis, and therefore while LDP policy can help ensure a local supply of aggregates, it cannot intervene with respect to the geographical distribution of market-led transactions.

Consequently, it is not considered that the inclusion of this criterion would be particularly effective in practical terms, either in its own right or by means of influencing more detailed policies/proposals that might be set out in the Deposit plan. However, the importance of local vernacular is not to be diminished, and placemaking/design policies will be able to consider how best it might be incorporated.

Action:

Amend criterion 1 of PS21 to read as follows:

1) Safeguarding known resources of sand, gravel, crushed rock and minerals infrastructure

3306 Object

Summary of Representations:

Hafod Fach Quarry is an extremely important site within South Wales, due to its ability to supply a resource (HSA with a PSV of 68+) that is essential for the road surfacing industry.

Therefore, policies within the emerging Local Development Plan need to support applications for HSA as well as appropriately safeguarding sites which extract and process HSA.

Response:

Comment is noted. The safeguarding of sites will be a matter for the Deposit plan.

Action:

No amendment required.

3477 Comment

Summary of Representations:

Tarmac support the overall aim of this policy and welcome the inclusion of safeguarding mineral resource, a requirement to maintain a minimum 10-year land bank, reference to the efficient use of high-quality mineral and safeguarding of mineral infrastructure within the emerging Local Development Plan.

Response:

Comment in support is noted.

Action:

No amendment required.

3478 Support

Summary of Representations:

To ensure that the emerging Local Development Plan adequately protects and promotes the extraction of HSA, a clear distinction should be made between HSA and general construction-grade aggregates in the Local Plan (currently referenced as 'crushed rock' in the PS21 'Minerals' strategy). This distinction would ensure that policies acknowledge the difference between these resources and reinforces the national importance of HSA as advocated in PPW (paragraph 5.14.23).

Response:

The policy, as drafted, refers to the efficient and appropriate use of high-quality minerals. The importance of HSA is therefore recognised, and balanced against the need to consider potential constraints.

Action:

No amendment required.

3483 Object

Summary of Representations:

The wording within Policy CW22 is supported by Tarmac as it is positive in its approach, aligning with the PPW. Tarmac would welcome safeguarding areas to be shown on Proposals Maps.

Response:

Comment in support is noted. The proposals map will be a matter for the Deposit plan, but as with the adopted plan, it is the Council's intention to publicise minerals safeguarding areas via this medium.

Action:

No amendment required.

3487 Comment**Summary of Representations:**

Should the Council consider site specific buffer zones around mineral sites, some amendments are suggested to CW23:

No new mineral development will be permitted within the buffer zone to prevent encroachment towards the sensitive land uses. No new sensitive development will be permitted both to prevent any encroachment but also to prevent an additional constraint for the mineral working'.

Whilst it is acknowledged that the current adopted buffer zone policy (Policy CW23) is likely to be reproduced to some extent in the emerging Local Development Plan, consideration should be given to the defined buffer zone boundaries. These should not be arbitrary/standardised boundaries but should be flexible, and drawn in consultation with operators/land owners.

Response:

Buffer zones are a requirement of national policy, as the respondent points out. While the suggestion is noted, countywide policies will be a matter for the Deposit plan.

Action:

No amendment required.

3489 Comment**Policy PS21: Minerals****Summary of Representations:**

Comment on Policy PS21 seeking continuing discussion in respect of meeting the RTS2 apportionment within the sub- region.

Response:

Comment is noted. While the issue of RTS2 apportionment underpins policy PS21, it does not impact on the proposed text of the policy. The Council will continue to liaise with adjoining local authorities in respect of minerals.

Action:

No amendment required.

3541 Comment**Summary of Representations:**

An objection to the washing over of land as part of the minerals safeguarding is raised, particularly in terms of existing Housing Allocation HG1.40 Land at Gellideg

Heights and the surrounding land as per Candidate Site GB021.

Given the existing allocation and the

development within the settlement boundary then it is highly unlikely that extraction would take place and the site should no longer form part of the policy requirement.

Response:

While the allocation of sites and delineation of minerals safeguarding areas will be a matter for the Deposit plan, national policy advises that safeguarding does not necessarily indicate an acceptance of mineral working, but that the location and quality of the mineral is known and that the environmental constraints associated with extraction, including the potential for extraction of mineral resources prior to undertaking other forms of development, should be considered. Safeguarding areas will be demarcated in such a way as not to contradict the principle of development established by the allocation of a site for a particular use.

Action:

No amendment required.

3599 Object**Pre-Deposit Plan Key Diagram****Summary of Representations:**

The map clearly shows that Bedwas has no transport links. The number 11 bus is being removed and there is a development planned for west Bedwas. This will all increase cars on the road and congestion in the greenway industrial estate. Bedwas is a 45 minute walk to Caerphilly towncentre so not close enough to prevent car travel

Response:

In accordance with the Development Plans Manual, the Pre-Deposit Plan contains a key diagram which illustrates the strategic approach. It is not a map setting out detailed proposals.

A more detailed Proposals Map will be published alongside the Deposit plan.

Action:

No amendment required.

2192 Object

8Next Steps

Summary of Representations:

Further Work Required by Deposit stage

- Undertake further regional collaboration to demonstrate how the emerging LDP aligns with the broader approach in the region of other LPAs
- Publish the most recent LHMA, identify an affordable housing need target over the plan period and assess any potential implications arising from the current and most recent assessments
- Breakdown the scale and spatial distribution of housing for each settlement tier
- Clearly articulate the spatial distribution of housing and other key land uses
- Specify a housing trajectory
- Identify the outstanding number of Gypsy & Traveller pitches with spatial allocations as per Policy PS20 (the evidence suggest it could be 8 pitches, less if permissions are granted)
- Specify the minerals landbank, identify any future requirements (if necessary) including buffer zones
- Undertake viability assessments to demonstrate sites can be delivered in line with the identified infrastructure requirements
- Identify infrastructure required for development
- Consider the need for masterplans for larger sites, where appropriate
- Include policies for all types of renewable energy generation both inside and outside pre-assessed areas
- The core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' should be followed.

Response:

The comments in relation to further work are noted. These will be addressed in the process of preparing the Deposit plan.

Action:

No amendment required.

The additional evidence suggested by Welsh Government will be considered in the preparation of the Deposit plan.

3781 Comment

Appendix 2: Evidence Base and Supporting Documents for the Revised Preferred Strategy

Summary of Representations:

Lidl GB Ltd disagrees with the LPA's assessment of Candidate Site RNC105 – Land South of Commercial Street, Risca. The reasoning for discounting the site for further consideration at Stage 2 is not justified.

Response:

This comment relates to a candidate site. Due consideration will be given to the issues raised.

Action:

No amendment required.

3284 Object

Annex 2b: Evidence Base Document Representations Integrated Sustainability Appraisal (ISA), Interim ISA Report

Summary of representations:

CB025 Nant y Calch Farm, Warren Drive, Caerphilly

Objection to Housing Plans due to extremely unsafe access and egress, pollution, 'green belt' land, ecological concerns.

Response:

This comment relates to a candidate site. Due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2070 Object

Summary of representations:

The WG does have concerns with the comments under bullet point 6, on p76 of the ISA; 'The majority of land in the county borough is not suitable for agricultural uses due to its lower quality agricultural grading...'. This statement is factually incorrect and should be amended or removed. The ALC grading reflects the capability of land for a wide variety of agricultural cropping choices, not for its suitability for agricultural use.

Response:

The comment is acknowledged. This point will be amended to reflect the nature of the ALC grading system.

Action:

Amend bullet point in question to read:

"The majority of land in the County Borough is of limited value in terms of the range and yield of crops that can be sustained, due to its lower quality agricultural grading. However, there are some small areas of higher quality land at Draethen."

3776 Object

Support

Summary of representations:

We welcome the screening report and agree with the scope of the sites identified and agree that a 15 km buffer area is appropriate.

Response:

Comment in support is noted.

Action:

No amendment required.

3804 Support

Integrated Sustainability Appraisal (ISA), ISA Scoping Report

Summary of representations:

CB025 Nant y Calch Farm, Warren Drive, Caerphilly

Objection to Housing Plans due to extremely unsafe access and egress, pollution, 'green belt' land, ecology.

Response:

This comment relates to a candidate site. Due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2071 Object

Summary of representations:

The Integrated Sustainability Appraisal in Chapter 9 considers archaeology, the historic environment and heritage, which are noted as objectives to preserve and enhance, and are key issues to be taken into consideration relating to understanding and mitigation in the development process. The themes dealing more specifically with the historic environment and landscapes, note, as we have previously stated, that all forms of planned activity will have an impact on the historic environment, including large scale infrastructure works of all types. The support of a range of Policies within the Plan reduces adverse impact on the historic environment and therefore should ensure compliance with Welsh Government Legislation and Policy.

Response:

Comments are noted.

Action:

No amendment required.

3858 Comment

Summary of representations:

The Habitats Regulations Assessment refers to the protected areas of the natural environment. The Historic Environment Record shows there are features and sites

relating to the historic environment which are within the areas of importance to the natural environment, and these should be considered not in isolation from each other. The threats to the natural environment are those faced by the historic environment.

Response:

Comments are noted.

Action:

No amendment required.

3859 Comment

Evidence Base, EB1 Strategy Options Assessment

Summary of representations:

I strongly object to any development of these areas for many reasons including the need to protect our sacred countryside and species for future generations.

The ability to access green spaces is vital for mental health and wellbeing and these proposals would damage future generations. The climate crisis means it's more imperative than ever to respect nature. To lose these green spaces and ancient species would be utterly devastating .

Response:

While the allocation of specific sites will be a matter for the Deposit Plan, this process, including the assessment of candidate sites, will be undertaken in compliance with national policy. This includes the approach set out with regard to the development of non-previously developed land and the protection of biodiversity.

Action:

No amendment required.

3178 Object

Evidence Base, EB2.1 Pre-Deposit Engagement (Addendum)

Summary of representations:

Objection to CB025 Nant y Calch Farm, Warren Drive, Caerphilly.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2072 Object**Evidence Base, EB3 Settlement Role, Function and Sustainability Analysis****Summary of representations:**

CB025 Nant y Calch Farm, Warren Drive, Caerphilly

Objection to Housing Plans due to extremely unsafe access roads, pollution and other issues explained above

Response:

This comment relates to a candidate site. Due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2073 Object**Summary of representations:**

Alternative proposals for the Twyn, Caerphilly.

Response:

The allocation of sites for specific uses will be a matter for the Deposit Plan. For representations relating to candidate sites, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

3131 Comment

Evidence Base, EB4 Population and Housing Growth Options

Summary of representations:

Census data gathered in 2021, (with a 98% return value) shows a decrease in population of some 3k and substantial increase in over 65-year-olds, a decline in children and decline in those in work or employment. Coupled to this fact that the area had in 2001 the highest level of out commuting in Wales, (Experian 2001). With more than 43% of the current workforce commuting out in 2021. Double the Wales average. So, if we step back from these facts the policy is likely to create further commuting out as family homes are built, with no marked increase in job opportunities within the area. Increasing pressure on existing communities' way of life and pressure on failing or absent infrastructure. All making the area less attractive to investors. Simply increasing the number of residents is not likely to address the current imbalance, creating more impacts on the environment, increased commuting and travel disruption and not creating balanced sociable places.

The majority of the people migrating into CCBC area are for personal financial reasons. They then commute outwards, have family and social networks elsewhere and many socialise elsewhere. Such behaviour although fully understandable does not build a circular economy. The potential is that if this continues throughout the period of the plan wages locally will remain low mainly in manufacturing or service industries with higher paid workers commuting and spending outside the CCBC area. Potentially increasing a low wage economy and increased poverty in CCBC. This is not a sustainable position for socio-economic betterment and inconsistent with PPW.

Response:

The Revised Preferred Strategy is based upon population and housing projections that were prepared as part of its identification and preparation. The 2018 based Welsh Government Mid-Year Estimates (MYE) identified Caerphilly County Borough as having a declining population for the first time in its history, predominantly based on natural change (births in relation to deaths). The issue of a declining population raises very significant issues for the County Borough, not least the loss of population would mean that there would be a reducing working age population that would result in a decline in the County Borough's economy. This would mean that the Council would need to plan for economic recession. This would be at odds with the regional economic aspirations of the Cardiff Capital Region (CCR) that is seeking a 3.5% growth in jobs over the CCR City Deal period. The Council did not consider the option of recession to be one that it should pursue, and a range of alternative population projections were considered as options for the Preferred Strategy. These are set out in Evidence Base Document EB4 - Population & Housing Growth Options. The Council considered the best projection for the County Borough to be one that addresses the need to ensure an economically active population to ensure that there are sufficiently economically active people to deliver the level in growth that the CCR are expecting across the region, namely an approximate 3.5% increase in jobs. The proposed level of growth underpinning the Revised Preferred Strategy is above the Welsh Government MYEs for clear and obvious reasons, and the

projections have been specifically selected to address the issues facing the County Borough, particularly to increase the number and level of jobs in the County Borough.

Action:

No amendment required.

3418 Object

Evidence Base, EB4.1 Population and Housing Growth Options (Addendum)

Summary of representations:

Objection to CB025 Nant y Calch Farm, Warren Drive, Caerphilly

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2074 Object

Evidence Base, EB5.1 Housing Land Supply and Affordable Housing Target (Addendum)

Summary of representations:

Objection to CB025 Nant y Calch Farm, Warren Drive, Caerphilly.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2075 Object

Evidence Base, EB6 Local Housing Market Assessment

Summary of representations:

Objection to CB025 Nant y Calch Farm, Warren Drive, Caerphilly.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2076 Object

Evidence Base, EB11 Transport Evidence Paper

Summary of representations:

CB025 Nant y Calch Farm, Warren Drive, Caerphilly

Objection to housing plans due to extremely dangerous access roads, pollution and other reasons listed above.

Response:

Whilst the comments relate more specifically to Candidate Site CB025, they are noted. In its assessment, after taking advice from highways officers, the site has been determined to be 'suitable for further consideration'. Additional information about the site will be assessed before deciding whether to allocate it for development in the 2RLDP. No change to Evidence Base Document EB11 is required.

For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2077 Object

Evidence Base, EB12 Strategic Flood Consequences Assessment

Summary of representations:

CB025 NantyCalch Farm, Caerphilly, Green Belt Agricultural Land, proposed for housing use.

This site was originally scoped for housing as part of the Ness Tar Plant where a new road would be built for access. Nant y Calch Part B and C (Tar Plant) are no longer being considered so the road will not be built.

This site cannot in any way be safely accessed from Warren Drive, Corbett Crescent, Princes Avenue, King Edward Avenue or Railway Terrace if looking to bring a road through allotments. This area is already dangerous to current residents due to traffic, parking and driving issues, also off Mountain Road and across the King Edward Avenue junction this is used daily by hundreds of school children and is already a dangerous junction, as are all the junctions leading onto Mountain Road. An accident last year on King Edward Avenue junction caused a child to have life changing injuries. As well as this issue there is the issue of pollution, green belt land being disregarded in a site which is of specific ecological interest, and had the clay pits and surround areas saved from building some years ago. There is a water course running through the farm and back of Dan y Coed which already runs high when it rains, if buildings we put in this area, this could increase the risk of flooding to Dan y Coed. The housing at the St Ilan School on Pontygwindy Road was stopped I believe due to access and pollution issues, this land should be looked at in the same way. Also the plan showing this land is wrong it encroaches on private property at Dan y Coed and the rear of Princes Avenue. This site simply cannot be built as it would endanger local residents both via pollution and traffic access and egress.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2078 Object

Summary of representations:

We recognise your authority is part of the Southeast Wales SFCA group developing a regional assessment. However, at the time of writing, only Stage 1 of the SFCA has been completed for your administrative boundary. If site allocations for the RLDP are shown to be at risk of flooding (based on the FMfP), for the Plan to be sound we would expect the SFCA to progress to Stage 2 and, if necessary, Stage 3. Further guidance on preparing SFCAs can be found on our website.

Response:

Comments submitted in regard to EB12 Strategic Flood Consequence Assessment are noted. The council will consider the points raised as it moves towards the Deposit stage.

Action:

Evidence base document to be updated to inform the Deposit stage.

3788 Comment**Evidence Base, EB13 Renewable and Low Carbon Energy Assessment****Summary of representations:**

It is therefore unclear how impact to peat soils and peatland habitats (in the context of Chapter 6 of PPW 12) has been considered in the Renewable and Low Carbon Energy Assessment paper (2022), specifically in respect of Local Search areas proposed for wind generation (Fig 2). It is unclear how BMV policy has been considered in respect of local search areas proposed for solar PV generation (Fig 1). The WG will expect clarification for deposit stage on the above points regarding renewable energy search areas.

Response:

The comments from Welsh Government in regards to EB13 Renewable and Low Carbon Energy Assessment are noted. The Council acknowledges these comments and will update the evidence base for the Deposit stage of the plan.

Action:

No amendment required.

Evidence base document to be updated to inform the Deposit stage.

3779 Comment**Evidence Base, EB14 Employment Background Evidence Paper****Summary of representations:**

The 2RLDP allocates and safeguards more land than is necessary for the Plan period. Furthermore, the evidence base fails to recognise the definition of 'economic development' set out in PPW and TAN 24 (ie "offices, research and development, industry and warehousing, as well as uses such as retail, tourism, and public services") and the weight given to the foundational economy in Future Wales (which

includes retail). Such uses should be allowed on secondary employment sites and Penmaen secondary employment site specifically.

Response:

The approach used in formulating the employment land requirement complies with national policy, in terms of the methodology suggested by TAN 23 (and the practice guidance) for the undertaking of employment land reviews. The ELR process summarised in Evidence Base Document EB14 considered past building completions and labour demand forecasting, as well as the resident workforce forecast. The approach taken was, therefore, robust. The proposed allocations set out are considered to meet the forecast requirement, rather than the other way around, and the view that this amounts to an oversupply is refuted. Additional sites are safeguarded by virtue of their existing uses; they do not contribute to the supply of employment land in the same manner as allocated sites, and should not be viewed in this regard.

The role of non-class B uses in economic terms, including elements of the 'foundational economy' that lie outside this range, is recognised. However, TAN 23 is clear that classes B1-B8 must be planned for in a sustainable way, and that the ELR process, by extension, deals principally with uses in these classes.

As with the Adopted plan, the policy framework will continue to seek a flexible approach regarding the range of permissible uses, particularly on secondary sites. Whilst the importance of uses such as retail are recognised, it does not necessarily follow that they constitute suitable co-habitants of class B-dominated environments, especially given the requirement of the national policy to direct such uses to town centres.

This is not to say that there is not a need to reconsider parts of safeguarded sites in terms of their continued suitability for class B use, in conjunction with the site assessments taken by the ELR and the tests set out within TAN 23 in terms of the release of land for alternative uses, but this will be a matter for the Deposit plan.

Action:

No amendment required.

3158 Object

Evidence Base, EB20 Green Infrastructure Assessment

Summary of representations:

Objection to CB025 Nant y Calch Farm.

Response:

This comment relates to a Candidate Site. For representations relating to Candidate Sites that raise particular matters of concern, due consideration will be given to the issues raised in the next stage of the process.

Action:

No amendment required.

2079 Object**Summary of representations:**

Support for the recognition of natural areas and the importance of safeguarding areas of importance for enhancement and connectivity.

Response:

The comments made in support are noted.

Action:

No amendment required.

3230 Support**Summary of representations:**

Advise amendments to the Green Infrastructure Assessment to include two newly designated Sites of Special Scientific Interest (SSSIs).

Response:

The Council has published its initial Green Infrastructure Assessment to support the Revised Preferred Strategy. Following the publication of the GIA, Natural Resource Wales has designated two additional SSSIs within the county borough. The GIA will be updated to include all additional sites and will map them accordingly. The results of which will inform the Deposit plan and Candidate Sites process.

Action:

No amendment required.

Evidence Base Documents to be updated to inform the Deposit stage.

3786 Object

Summary of representations:

Support for the GIA and the initial baseline review of green and blue infrastructure assets within the county borough.

Response:

The comments made in support are noted.

Action:

No amendment required.

4047 Support

Summary of representations:

We would be grateful if you could ensure all Regionally Important Geological Sites in your area are identified on your systems and considered an essential part of Green Infrastructure Assessments.

Response:

The Green Infrastructure Assessment will be updated to include all RIGS, which will inform the Deposit stage of the plan.

Action:

No amendment required.

Evidence Base Documents to be updated to inform the Deposit stage.

2166 Comment

Summary of representations:

The GIA and accompanying map (GI4.3) provide detail on the amount and distribution of BMV in the LPA area. The GIA provides some information on importance of peatland and information on location and distribution in the LPA area.

However, the source of this information is not clear. The WG considers the Peatlands of Wales Evidence Score map should be used as the evidence base.

Response:

The GIA outlines Peatland areas within the county borough. Supporting map GI4.3 includes the Peatlands of Wales Evidence data. This will be updated further to support the Deposit Plan.

Action:

No amendment required.

3778 Comment**Summary of representations:**

NRW are a partner in a grant award to deliver Resilient Ecological Networks for Gwent, with the work fully funded over the next two years, starting in April 2025. This will provide policy planners to use collaboratively designed RENs in the production of their LDPs. Therefore, this is a great opportunity for the GIA to link into, and be informed by, this new evidence base.

Response:

The Council has developed its Green Infrastructure Assessment in line with Guidance Note 42: GIAs produced by NRW. As part of this work the GIA has set out a strategic level baseline review of green and blue infrastructure assets within the county borough. The Council will continue to work closely with external stakeholders to develop the evidence base further for the Deposit stage of the plan, which will include incorporating new and updated datasets as and when they become available.

Action:

No amendment required.

3787 Comment**Summary of representations:**

The amount of BMV agricultural land within the LPA boundary is low, and therefore the risk is small. However, the Authority has demonstrated that the BMV Policy has been considered from the outset and throughout the process of developing the Preferred Strategy.

Response:

The GIA provides an overview of BMV land based on Welsh Governments 2019 ALC classifications. The Council acknowledges the comments made by Welsh Government in respect of the consideration of the best and most versatile agricultural land within the GIA.

Action:

No amendment required.

ANNEX 3: COMMENTS RELATING TO CANDIDATE SITES

In total 1,606 representations were duly made in respect of Candidate Sites during the statutory consultation period.

Table 1 identifies the number of representations made in support, the objections raised and the comments made to sites within each Masterplan area.

Table 1 - Masterplan Areas

Masterplan Area	Support	Object	Comment	Total
Caerphilly Basin (CB)	21	763	41	825
Greater Blackwood (GB)	5	98	35	138
Heads of the Valleys (HOV)	1	4	31	36
Lower Ebbw and Sirhowy Valleys (RNC)	1	98	32	131
Ystrad Mynach (YM)	16	430	30	476
Total	44	1,391	171	1,606

The following tables detail all sites, by area:

- Table 2 - Caerphilly Basin (CB)
- Table 3 - Greater Blackwood (GB)
- Table 4 - Heads of the Valleys (HOV)
- Table 5 - Lower Ebbw and Sirhowy Valleys (RNC)
- Table 6 - Ystrad Mynach (YM)

Table 2 – Caerphilly Basin (CB)

Caerphilly Basin (CB)	Support	Object	Comment	Total
CB001 - Land south of Cefn Ilan, Abertridwr	0	0	1	1
CB002 - Ness Tar, Caerphilly	1	4	1	6
CB003 - Land at The Oaks, Rudry	0	4	1	5

CB004 - Land at Energlyn, Caerphilly	1	62	1	64
CB005 - Catnic, Caerphilly	1	0	1	2
CB006 - Gwaun Gledyr, Caerphilly	0	1	1	2
CB007 - Land at Starbuck Street, Rudry	0	2	1	3
CB008 - Land at Ty Nula, Rudry	0	1	1	2
CB009 - Land at Lower Brynhyfryd Terrace, Senghenydd	0	1	1	2
CB010 - Welsh Egg Farm, Caerphilly	1	2	1	4
CB011 - Land at Colliery Road, Llanbradach	0	1	1	2
CB012 - Windsor Colliery, Abertridwr	0	0	1	1
CB013 - Land at Pandy Mawr Road. Bedwas	0	1	1	2
CB014 - Ty Isaf Farmlands (Site 1), Caerphilly	0	0	1	1
CB015 - Ty Isaf Farmlands (Site 2), Caerphilly	0	2	1	3
CB016 - Former Tinworks, Waterloo	1	0	1	2
CB017 - Land at Pandy Road (phase 2), Bedwas	3	15	1	19
CB018 - Land at Watford Road, Caerphilly	0	17	1	18
CB019 - Land west of Mill Close, Caerphilly	0	0	1	1
CB020 - Land at Watford Park, Caerphilly	0	4	1	5
CB021 - Land west of Colliery Road, Llanbradach	0	1	1	2
CB022 - Gwern y Domen, Caerphilly	1	10	1	12
CB023 - Land south of Rudry Road, Caerphilly	1	327	1	329

CB024 - Land at Porset Row, Caerphilly	0	4	1	5
CB025 - Land at Nantycalch Farm (Option A), Caerphilly	3	167	1	171
CB026 - Land at Garth View, Bedwas	0	1	1	2
CB027 - Land near Van Mansion, Caerphilly	1	8	1	10
CB028 - Land East of Railway Terrace, Caerphilly (Former Ness Tar and Pesci Sites)	2	22	1	25
CB029 - Land East of School Street, Llanbradach	0	1	1	2
CB030 - Land north of James Street, Trethomas	0	14	1	15
CB031 - Land at Bedwas Colliery, Bedwas	0	9	1	10
CB032 - Land at Nantycalch Farm (Option B), Caerphilly	1	23	1	25
CB033 - Land at Nantycalch Farm (Option C), Caerphilly	0	19	1	20
CB034 - Gelli Wastad Farm, Machen	0	0	1	1
CB035 - Land to the south of Sunnybank Terrace, Machen	1	2	1	4
CB101 Former Water Treatment Works, Land east of Rudry	1	0	1	2
CB102 Land to the south of Sunnybank Terrace	2	0	1	3
CB103 Gwaun Gledyr	0	4	1	5
CB104 Land off Colliery Road, Bedwas	0	1	1	2
CB105 Land off Colliery Road, Bedwas	0	3	1	4
CB106 Land near Van Mansion	0	30	1	31
Total	21	763	41	825

Table 3 - Greater Blackwood (GB)

Greater Blackwood (GB)	Support	Object	Comment	Total
GB001 - Land and garage buildings north of Main Road, Maesycwmmmer	0	0	1	1
GB002 - Land adjoining Old Junction House, Commercial Street, Pontllanfraith	0	0	1	1
GB003 - Trinant Sports & Social Club, Trinant	0	0	1	1
GB004 - Land west of Seda, Hawtin Park	0	1	1	2
GB005 - Land at The Gwrhay, Argoed	0	0	1	1
GB006 - Land at Oakdale Terrace, Oakdale	0	2	1	3
GB008 - Land at Ty Mawr, Croespenmaen	0	0	1	1
GB009 - Land at Gellideg, Maesycwmmmer	0	11	1	12
GB010 - Land at Nant Gau, Oakdale	0	12	1	13
GB011 - Land at Gellideg Heights, Maesycwmmmer	0	7	1	8
GB012 - Land at Heol y Cefn, Blackwood	1	9	1	11
GB013 - Land east of Oakdale Golf Club,	1	7	1	9
GB014 - Land off Summerfield Hall Lane, Gellihaf	0	1	1	2
GB015 - Trelyn Scrapyard, Blackwood	0	0	1	1
GB016 - Land at Parkway, Penyfan, Croespenmaen	0	0	1	1
GB017 - Pen Rhiw Fields, North of Central Avenue, Oakdale	0	6	1	7

GB018 - Land at St David's Avenue, Blackwood	0	0	1	1
GB019 - 1 Pentref-Y-Groes Farm, Croespenmaen	0	0	1	1
GB020 - 1 Pentref-Y-Groes Farm, Croespenmaen	0	0	1	1
GB021 - Former Gellideg Industrial Estate, Maesycwmmmer	1	11	1	13
GB022 - Land at Parc Gwernau, Maesycwmmmer	2	2	1	5
GB023 - Pantysgawen Farm, Croespenmaen	0	0	1	1
GB024 - Tir Filkins Colliery	0	0	1	1
GB025 - Land South of Heol Y Dderwen, Blackwood	0	0	1	1
GB026 - Land East of Heol Y Dderwen, Blackwood	0	0	1	1
GB027 - Brierly House, Aberbeeg, Abertillery	0	0	1	1
GB028 - Former Pontllanfraith School	0	1	1	2
GB029 - Former Oakdale Comprehensive	0	0	1	1
GB030 - Land at Cwmgelli Farm, Blackwood	0	13	1	14
GB031 - Land off Woodfield Park Lane	0	0	1	1
GB032 - Land at Penrhiw Bengi Lane, Oakdale	0	0	1	1
GB033 - Land at Pencoed Fawr Farm, off Beaumaris Way, Blackwood	0	11	1	12
GB101 Lower Lodge, Woodfield Park, Penmaen	0	4	1	5
GB102 Land east of Heol y Dderwen	0	0	1	1

GB103 Tyllwyd Quarries, Cwm-nant-yr-odyn	0	0	1	1
Total	5	98	35	138

Table 4 - Heads of the Valleys (HOV)

Heads of the Valleys (HOV)	Support	Object	Comment	Total
HOV001 - Land adjacent to McLaren Cottages, Abertysswg	0	0	1	1
HOV002 - Land at Markham Colliery, Markham	0	0	1	1
HOV003 - Land south of Springfield Terrace, Hollybush	0	0	1	1
HOV004 - Land at Coed-y-Brain House, Aberbargoed	0	0	1	1
HOV005 - Land at 60 Abernant Road, Markham	0	0	1	1
HOV006 - Land at Coed-y-Brain House (site 2), Aberbargoed	0	0	1	1
HOV007 - Land at Coed-y-Brain House (site 3), Aberbargoed	0	0	1	1
HOV008 - Land north of Carno Street, Rhymney	0	0	1	1
HOV009 - Land at former Station House, Rhymney	0	0	1	1
HOV010 - Land at Abernant Road, Markham	0	0	1	1
HOV011 - Land to the east of the A4048, Hollybush	0	0	1	1
HOV012 - Land at Heol Pen Rhiw'r Eglwys, Bedwellty	1	0	1	2
HOV013 - Land at Gelliwen Farm, Markham	0	0	1	1

HOV014 - Land south of Hillside Park, Bargoed	0	0	1	1
HOV015 - Land at Park Estate, Bargoed	0	0	1	1
HOV016 - Land opposite Heolddu Grove, Bargoed	0	0	1	1
HOV017 - Land East of Brynhyfryd, Pontlloftyn	0	0	1	1
HOV018 - Land south of Greensway, Abertysswg	0	0	1	1
HOV019 - Aberbargoed Plateau, Aberbargoed	0	1	1	2
HOV020 - Former Aldi Site, Rhymney	0	0	1	1
HOV021 - Land off Manmoel Road, Manmoel (South of Village Hall)	0	0	1	1
HOV101 Land west of Carn y Tyla Terrace	0	0	1	1
HOV102 Maerdy Crossing	0	0	1	1
HOV103 Land at Heol Fargoed	0	2	1	3
HOV104 Land east of John Street	0	0	1	1
HOV105 Argoed Fawr Farm, The Rock	0	0	1	1
HOV106 Land adjacent to Ty Rhosyn, Graig y Bedw, Elliots Town	0	0	1	1
HOV107 Land south of Heol Pen-Rhiw'r Eglwys	0	0	1	1
HOV108 Land south-east of Sunny View	0	0	1	1
HOV109 Heolddu Comprehensive School, Mountain Road	0	1	1	2
HOV110 Land at Coed-y-Brain	0	0	1	1
Total	1	4	31	36

Table 5 - Lower Ebbw and Sirhowy Valleys (RNC)

Lower Ebbw and Sirhowy Valleys (RNC)	Support	Object	Comment	Total
RNC001 - Land adjoining 66 Llanfach Road, Abercarn	0	1	1	2
RNC002 - Land at Gelli-Unig Place, Pontywaun	0	1	1	2
RNC003 - Land between Twyn Gwyn Road & Mount Pleasant, Ynysddu	0	0	1	1
RNC004 - Land at Sofrydd Road, Hafodyrynys	0	0	1	1
RNC005 - Former Cwmcarn High School	0	0	1	1
RNC006 - Former allotments, Wattsville	0	1	1	2
RNC007 - Land at Inn on the Park, Fields Park, Newbridge	0	0	1	1
RNC008 - Land west of Albertina Road, Newbridge	1	38	1	40
RNC009 - Land north of Ramping Road, Cwmcarn	0	0	1	1
RNC010 - Land north of Tribute Avenue, Cwmcarn	0	0	1	1
RNC011 - Penyfan Farm, Risca Road, Risca	0	17	1	18
RNC012 - Penyfan Farm (site 2), Risca Road	0	3	1	4
RNC013 - Glanhowy Road, Wyllie	0	0	1	1
RNC014 - Land south of the Glade, Wyllie	0	0	1	1
RNC015 - Land at cycle path, Wyllie	0	0	1	1
RNC016 - Land west of Pen y Cwarel Road, Wyllie	0	0	1	1
RNC017 - Land at Snowdon Close, Ty Melyn, Risca	0	8	1	9

RNC018 - Land North of Holly Road, Penrhiw, Risca	0	5	1	6
RNC019 - Land south of Holly Road (West), Risca	0	0	1	1
RNC020 - Land south of Holly Road (East), Risca	0	0	1	1
RNC021 - Land at Tynewydd Park, Risca	0	0	1	1
RNC022 - Land at Ty Darren, Risca	0	0	1	1
RNC023 - Council Service Site, Brookland Road, Risca	0	5	1	6
RNC024 - Land next to Risca Leisure Centre	0	6	1	7
RNC025 - Land at Elm Drive, Pontymister	0	6	1	7
RNC026 - Twyn Gwyn Farm, Newbridge	0	0	1	1
RNC027 - Land rear of Holly Road flats, Risca	0	0	1	1
RNC028 - Land at Pen-y-Cwarel Road, Wyllie	0	2	1	3
RNC101 Commercial Street, Ynysddu	0	0	1	1
RNC102 Land adjacent to 1 Pontgam Terrace	0	0	1	1
RNC104 Land at Homeleigh	0	0	1	1
RNC105 Land to the south of Commercial Street, Risca	0	0	1	1
RNC106 Land south of Chapel Farm Ind Est	0	0	1	1
RNC107 Upper Mount Pleasant Farm, Rogerstone	0	3	1	4
Total	1	96	34	131

Table 6 - Ystrad Mynach (YM)

Site Name	Support	Object	Comment	Total
YM001 - Land north of Cae Ysbugar, Cefn Hengoed	0	3	1	4
YM002 - Land North of Brooklands, Nelson	0	0	1	1
YM003 - Land West of Bwl Road, Nelson	0	0	1	1
YM004 - Land adjacent to 18 Haulwen Road, Pedpedairheol	0	3	1	4
YM005 - DCWW Depot, Pentwyn Road, Nelson	0	0	1	1
YM006 - Land at Caerphilly Road, Tredomen	0	0	1	1
YM007 - Land south of Gelligaer Court, Penpedairheol	0	7	1	8
YM008 - Land at Mountain Way, Nelson	0	0	1	1
YM009 - Land off Twyn Road, Ystrad Mynach	0	0	1	1
YM010 - Land at Rhos Farm, Penpedairheol	1	231	1	233
YM011 - Land north of A472, Tredomen	1	6	1	8
YM012 - Land south of A472, Tredomen	1	7	1	9
YM013 - Land at Glyngaer Road, Penpedairheol	4	18	1	23
YM014 - Gelligaer Uchaf Farm, Gelligaer	1	0	1	2
YM015 - Land to north and east of Cefn Hengoed, Cefn Hengoed	0	2	1	3

YM016 - Gelligaer Uchaf Farm, Gelligaer (Site 2)	0	0	1	1
YM017 - Land at Cefn Llwynau Farm, Penallta Road, Penybryn	1	20	1	22
YM018 - Land at Forest Avenue, Cefn Hengoed	0	20	1	21
YM019 - Land at Hengoed Avenue, Cefn Hengoed	0	22	1	23
YM020 - Land at Myrtle Grove, Hengoed	0	30	1	31
YM021 - Land East of Maes-y-Onen, Maes Mafon Estate, Nelson	0	0	1	1
YM022 - Land south of Gwaun Fro, Penpedairheol	0	10	1	11
YM023 - Land South of Kestrel View, Hengoed	0	12	1	13
YM024 - Land West of West Road, Penallta	0	0	1	1
YM025 - Land east of Penybryn Tce, Penybryn	0	0	1	1
YM026 - Land at Ty Du Farm, Nelson	0	1	1	2
YM027 - Land adjacent to Tir y Berth Farm, Hengoed Road, Penpedairheol, Hengoed	0	22	1	23
YM028 - Land at Tir Jack Farm, Penpedairheol	0	16	1	17
YM029 - Partmart Automotive Recycling	7	0	1	8
YM101 Ty Du	0	0	1	1
Total	16	430	30	476

ANNEX 4: 3rd CALL FOR CANDIDATE SITES

In total 63 sites were submitted as part of the 3rd Call for Candidate Sites. These are listed as follows:

CB201	Land west of Gwaun Gledyr, Caerphilly
CB202	Ty Draw, Penrhiw Lane, Machen
CB203	Ysgubor Fach Stables, Machen
CB204	Gwaun Gledyr, Caerphilly
CB205	Land at Alexander Court, Caerphilly
CB206	Land at Attlee Court, Caerphilly
CB207	Land at Buxton Court, Caerphilly
CB208	Land at Haldane Court, Caerphilly
CB209	Land at Hartshorn Court, Caerphilly
CB210	Land at Wedgewood Court, Caerphilly
CB211	Land at Graham Court, Caerphilly
CB212	Land at Snowden Court, Caerphilly
CB213	Former Tinworks, Waterloo
CB214	Ty Fry, Nantgarw
CB215	Mill Road, Caerphilly
CB216	Ty-Llwyd, Groeswen Road, Caerphilly
CB217	Land at Ysuborwen, Groeswen Road, Caerphilly
CB218	Crown Building, Claude Road, Caerphilly
CB219	Land to rear of Morgan Street, Caerphilly
CB220	Park and ride, Caerphilly
CB221	Twyn car park, Caerphilly

CB222	Former Virginia Park Golf Club, Caerphilly
CB223	Buildings 6-10, Cardiff Road, Caerphilly
CB224	Castle Court, Caerphilly
CB225	Land at Pontygwindy Road, Caerphilly
CB226	Glyn Gwyn Farm, Trethomas, Caerphilly
CB227	Land north of 7 Pentwyngwyn Road, Rudry
CB228	Land south of Pentwyngwyn Stables, Rudry
CB229	Land south of Bedwas Industrial Estate, Bedwas
GB201	Pentref y Groes Farm, Croespenmaen
GB202	Land north of Brynheulog Cottages, Pontllanfraith
GB203	Bryn Meadows Golf Club, Maesycwmmmer
GB204	Former Stagecoach Depot, Penmaen Industrial Estate, Pontllanfraith
GB205	Land north of Blackwood, Blackwood
GB206	Land at A472, Maesycwmmmer
GB207	The Boot Field, Maescwmmmer
GB208	Land at the Crown roundabout, Pontllanfraith
GB209	Land at Rhiw Fields, Oakdale
GB210	Land south of Maesycwmmmer
HOV201	Land at Bryn-Oer Patch, Rhymney
HOV202	Green Meadow Farm (Site 1), Rhymney
HOV203	Green Meadow Farm (Site 2), Rhymney
HOV204	Land east of War Memorial Park, Rhymney
HOV205	Land next to Evans Road, Markham
HOV206	Land at 60 Abernant Road, Markham
HOV207	Bedwellty Greyhound Track, Bedwellty
HOV208	Castle Fields, Rhymney (Site 1), Rhymney

HOV209	Castle Fields, Rhymney (Site 2), Rhymney
RNC201	Land south of Ty Glyn, Risca
RNC202	Ty Glyn, Commercial Street, Ynysddu
RNC203	Land at Darran Road, Risca
RNC204	Land off Commercial Street, Pontymister, Risca
RNC205	Land north of Eppynt Close, Risca
RNC206	Land south of GLJ Recycling, Cwmcarn (site 1)
RNC207	Commercial Street, Risca
RNC208	Land south of the Glade, Wyllie
RNC209	Land east of Glanhowy Road, Wyllie
RNC210	Land south of GLJ Recycling, Cwmcarn (site 2)
YM201	Land at Pengam Road, Pengam
YM202	Land north of Bryncoed Terrace, Penpedairheol
YM203	Land west of Penallta Road, Penallta, Ystrad Mynach
YM204	Land west of Penybryn Football Ground, Penybryn
YM205	Land south west of Penallta Road, Penallta, Ystrad Mynach

Annex 5

Planning Aid Wales Community Engagement

Caerphilly 2nd Replacement LDP Preferred Strategy

Engagement Events Report

1.0 CONTEXT

1.1 Planning Aid Wales has been instructed by Caerphilly County Borough Council (CCBC) to support the engagement activity for the Caerphilly 2nd Replacement Local Development Plan (LDP) – Revised Preferred Strategy (2RLDP) consultation

1.2 Our instructed brief was to prepare and deliver a series of community and stakeholder engagement events between 15 January 2025 – 26 February 2025, in accordance with CCBC's Delivery Agreement. The events were targeted at identified stakeholders living or operating within the Caerphilly Council area. A mixture of online and face to face events were carried out. The online events were carried out remotely using the Microsoft Teams platform.

1.3 To deliver the brief, our work involved:

- Analysis and understanding of the current position of the 2RLDP.
- Review of key documents including the Delivery Agreement, past LDP engagement activity, identifying previous barriers, key stakeholder contacts etc. Discussions with Planning Officers as required.
- Selecting, defining objectives for and programming methods of engagement for events in line with our brief from CCBC.
- Attend events as facilitators for discussions and understanding the current plan working together with CCBC Officers. The broad purpose of the events will be to identify issues and attempt to achieve consensus on such issues.
- The purpose of the events was to raise awareness and encourage responses to the Preferred Strategy consultation which had a deadline on Wednesday 26 February 2025.

1.4 In relation to the events our role was:

- To arrange suitable dates and venues, where applicable, for the events. Send invitations to interested parties to attend events.

- Introduce the purpose, aims and key stages involved in the 2RLDP preparation process.
- Explain the key themes and proposals put forward in the Revised Preferred Strategy consultation document.
- Facilitate a discussion to capture initial feedback on the Revised Preferred Strategy consultation document.
- Explain the Candidate Sites Register and process for comments.
- Advise on next steps and how communities / stakeholders can input into the process.
- Prepare a report of feedback and issues raised for CCBC Strategic Planning Team.

1.5 As part of the process the following work was carried out by the Council:

- Provision of all relevant planning documents and stakeholder list.
- Provision of details of the Preferred Strategy consultation document.

1.6 The role of Planning Aid Wales in drafting the issues report is to report back the issues and comments raised by attendees at each event. Therefore, the issues and comments listed within this report are solely those of the attendees who attended each event and do not represent the views of Planning Aid Wales.

2.0 About Planning Aid Wales (PAW)

2.1 Planning Aid Wales is a registered charity that advocates and supports community involvement in planning in Wales. Founded in 1978, we have over 40 years' experience of helping individuals and community groups to understand and engage with the planning system. Our core services include delivering planning training to a range of audiences, developing easy read planning guidance and a free planning advice helpline. We are an organisation that has been commissioned for many community engagement planning projects in Wales; we have built a significant repository of engagement methods, tools and techniques and regularly publish news on good engagement practice.

2.2 We recognise LDP preparation is an important avenue for securing more effective public involvement in planning; our current business plan identifies LDP review as one of the three elements in the planning process on which we focus our engagement efforts.

2.3 Planning Aid Wales is an advocate of meaningful community engagement in planning. Through our work, we seek to raise the knowledge and capacity of communities to engage, but not just in the activity at hand - we seek to enable people to effectively participate in planning activities on an ongoing basis.

2.4 As an independent third party organisation, we have found time and again that communities are willing to engage with us, even where Local Planning Authorities have encountered barriers to engagement in the past. As part of our process, we

encourage active collaboration between Local Planning Authority (LPA) staff and community groups, thereby building better relationships for future engagement. We take no view on any local policy or specific development; we only support individuals and communities to express their own views effectively.

2.5 We recognise that the planning system can be complex and the needs / wants of communities do not always align with other interests. We manage expectations by helping our beneficiaries understand that planning is a holistic system that seeks to address a wide variety of priorities and clearly explain the scope and limitations of what the planning system (or particular activity) can achieve.

3.0 Stakeholder Preferred Strategy Engagement Events

3.1 Given the number of individuals and organisations listed on the Council's Stakeholder list, at the time of the current engagement work, and the additional organisations identified, it was decided to invite all to attend any of the advertised events. It was considered that this would provide a cross section of views and discussion. The following is a broad list of the groups that make up the stakeholders:

- Community Councils
- Gypsy and Traveller Organisations
- Heritage and Cultural Organisations
- Transport and Utilities
- Environment and Rural Organisations
- Developers and Development Consultants
- Community and Amenity Groups and Organisations
- Individuals/ Residents

3.2 The events were advertised using an online booking system. In addition, the engagement activities were advertised on the Council's website, social media posts, newsletters and also promoted by other organisations. Stakeholders were also contacted by email and letter (sent by CCBC), where requested, with details of the events. A copy of the invite is included in Appendix 2.

3.3 Six events were held, and stakeholders were invited to attend any of these six events. A mixture of online and face to face events were held, two events being online and four face to face events. The timing of the events was chosen to maximise attendance and provide a mix of times i.e. morning, afternoon and evening sessions. The date and format of the events is listed below:

- Wednesday 22 January 2025: 10am –12pm Online
- Wednesday 29 January 2025: 6 –8pm Risca Primary School, Dan-y-Graig Road, Risca, NP11 6DB
- Monday 3 February 2025: 6 -8pm Cwrt Rawlin School, Cae Croes Heol, Caerphilly CF83 1SN
- Wednesday 5 February 2025: 6 -8pm Bargoed YMCA, 12, Aeron Place, Bargoed,

- Thursday 13 February 2025: 2 -4pm Twyn Community Centre, Twyn Square, Caerphilly CF83 1JL
- Wednesday 19 February 2025: 6 –8pm Online

3.4 It was agreed with CCBC at the outset of the project that Officers from the Strategic Planning Team would not attend the events to allow for an independent discussion of issues.

Format of events

3.5 All events followed a similar format, Mark Jones, Planning Engagement Officer, Planning Aid Wales, introduced the event and provided an explanation of Planning Aid Wales and their role as independent facilitators for the event. The main presentation covered:

- Introduction
- What are your issues?
- 2RLDP Process and Pre-Deposit Plan (Revised Preferred Strategy) Summary
- Caerphilly CB Council Revised Preferred Strategy
- Candidate Sites
- How to get involved in the consultation process.

3.6 At the end of the initial part, a brief question and answer session took place to address any issues on the process. Mark Jones then delivered a more detailed presentation on the content of CCBC 2RLDP Preferred Strategy consultation document. In addition, there was also a discussion on wider issues raised by the attendees and an explanation of the candidate sites process and register. Questions were invited and where possible responded to, the issues raised were also noted for inclusion within this report. Planning Aid Wales participated in all the discussions to listen to the issues raised and also to pose queries to facilitate discussion.

3.7 The event concluded with Planning Aid Wales repeating the deadline for comments on the Preferred Strategy consultation of 26th February 2025. It was emphasised that this was an appropriate time to make meaningful comments to influence the 2RLDP as once the document moves forward the opportunity to influence the plan will become less. Attendees were also advised that an independent inspector would examine the plan on behalf of the Welsh Government and prepare a report on the soundness of the plan.

3.8 The objectives of the engagement events were as follows:

- Explain the 2RLDP process and timetable.
- Raise awareness of the importance of an LDP.
- Raise awareness of the Preferred Strategy Consultation.
- Highlight the main points of the consultation document.
- Explain what the candidate sites register is.

- Explain how people can respond and engage in the consultation process.
- Advise the deadline for comments.

Event attendance

3.9 A total of 1409 invites were initially sent by email and 396 by letter to stakeholders who registered their interest on the Council's database before the conclusion of the events. In addition, the advertisements of the engagement work via other sources also attracted interest and attendance. Follow up contact was also made with stakeholders to highlight the events. The table below summarises the bookings and attendance at each event:

Event	Numbers Attending
22 January 2025	25
29 January 2025	10
3 February 2025	17
5 February 2025	39
13 February 2025	17
19 February 2025	23

4.0 Summary of Issues Raised

4.1 The events generated a number of views and identified a number of issues from all participants, and these are listed in Appendix 1 of this report. There were a number of common issues which are summarised below under the following broad headings.

- Housing Growth
- Affordable Housing
- Employment Growth
- Settlement Hierarchy
- Infrastructure
- Transport

4.2 It is noted that some respondents made comments on specific candidate sites, and these are addressed and referred to in Appendix 1.

Housing

4.3 Whilst one venue focussed most of their comments on the candidate sites, others looked at the broader housing issue.

4.4 On the whole there was a general acceptance that more housing was needed and there were no overwhelming objections to the housing growth identified in the Preferred Strategy. Some questions were raised as to whether the overall figure and the additional housing would simply lead to further commuting out of the Borough and whether the housing figures would provide for workers in neighbouring authorities and even across the border in the Bristol area.

4.5 Attendees often raised concerns that current infrastructure may not be acceptable for increased housing provision. This includes road and congestion issues but also drainage and sewerage and community and social facilities. The majority of opinions were that infrastructure should be provided first before the housing.

4.6 Another regular comment related to the need to consider existing buildings first, such as bringing empty properties back into use and matters such as retrofit. It was accepted that such matters are often influenced by fiscal matters and difficult for planning policy to fully address. However, attendees felt the 2RLDP could be a vehicle to assist in this process.

4.7 The type of houses. It was suggested that they are often too big and too expensive. There is a need for a mix of housing from small 1 bed units to 4 bed units depending on the local need. Smaller units may also allow an ageing population to downsize and release more family units onto the market and avoid the need for new larger houses. Affordable housing is important, see below.

Affordable Housing

4.8 The overriding issue that came out of all sessions was that the affordable housing should make up a significant amount of new housing. Whilst there were comments that house prices are lower in some parts of the Borough it was considered that prices were still outside the reach of many, including first time buyers. With regard to the Council target to seek 1360 affordable dwellings there was a consensus of attendees was that this figure should be increased.

4.9 Similarly, many delegates suggested there was a need for robust policies in relation to Section 106 agreements and affordable housing. Attendees felt that in a number of cases developers simply come back and reduce this requirement. It was suggested that there may be a need for more detailed valuation advice to the Council in considering such requests to allow the Council to resist developer claims.

Employment Growth

4.10 Similar to the proposed housing growth there was little argument against the need for more employment land in the Borough and there was little adverse reaction to the provision of 44.5 Ha of employment land. Indeed, there were some comments in relation to the difficulty in finding appropriate employment sites at present. This

included one respondent detailing how this led them to locate their business outside the Borough albeit their workforce lived across the Borough. This had led to commuting issues and in their opinion unsustainable modes of transport.

4.11 The type of employment uses was considered important, with the need for a mix of uses. It was felt the days of heavy industry had now passed and there should be high tech businesses and employment that is skilled and provides higher levels of income. To accompany this there should be adequate provision for education and training to upskill workers and provide opportunities for younger people to stay in their home areas and work in skilled jobs. This was also considered to be a means to assist with commuting issues. The size of employment uses important, to provide a range of options from start-up businesses to larger established operations. Could the north of the Borough provide more suitable locations due to the completion of the Heads of the Valleys Road.

4.12 There was also a broad view that there were currently a number of vacant or redundant sites. Are these sites being considered? and would it be better to redevelop these brownfield sites than look for new ones, particularly if greenfield sites. The use of vacant town centre properties and other office properties to provide alternative employment uses.

4.13 Whilst the principle of additional employment was not considered unreasonable a number of constraints were put forward:

- Road infrastructure and congestion issues may deter employment businesses from coming to the Borough.
- Public transport may be a constraint.
- Are there means to encourage investment similar to former WDA operations?
- How can it be ensured that the land allocated will lead to the increase in jobs and economic population.

Preferred Strategy

4.13 There were no objections or negative observations in relation to Policy PS2 and that the 2RLDP adopts a hybrid strategy, comprised of Strategy Option 4: The Metro Investment Focus and Strategy Option 5: Town Centre First.

Settlement Hierarchy

4.14 Overall, there was an understanding of the principles behind the proposed settlement hierarchy in policy PS3. However, a frequent response from the events was that development and planning policies were too south centric. There was a feeling that development should be spread across the Borough.

4.15 Responses suggested that the needs of communities particularly in the northern part of the Borough were missing out. There were housing and employment needs in the north that should be considered. Whilst it was accepted that road infrastructure may be an issue in the north it was felt that the current development approach leads to more commuting from north to south and hence contributing to

congestion. The completed Heads of the Valleys Road also provided the opportunity for more development particularly employment.

4.16 In relation to the list of settlements in each category there were many respondents who felt Oakdale could not accommodate any more development and was “full”.

Transport

4.17 Various comments were made in relation transport. However, one common theme was in relation to adequate public transport. Attendees questioned whether public transport was adequate to meet the Preferred Strategy aims. This could lead to more car dependency and knock on impacts to matters such as congestion.

4.18 Parking was also raised as an issue. Whilst it was acknowledged that there was a desire to reduce the use of cars and this could lead to the reduction of parking spaces associated with new development. However, as mentioned above it was not considered that public transport or alternative modes of transport were adequate to meet this need. Therefore, there will still be a need for cars and if inadequate parking is provided for new development this will lead to further on street parking and associated issues.

Infrastructure

4.19 Concerns were raised that current infrastructure including roads, medical facilities and education were already oversubscribed and therefore new development would only exacerbate these issues. It was accepted that infrastructure could be provided to facilitate new development, but it was felt that such matters were often challenged by developers and subsequently reduced. In addition, infrastructure, if provided, always followed the development e.g. housing. Therefore, there was a general opinion that infrastructure should be provided before the particular development is provided be it housing or employment.

Conclusion

4.20 In conclusion, it is considered that the engagement events reached out to many people and a number of people took advantage of these events to understand more about the CCBC 2RLDP process. It is considered that the events not only met the objectives outlined in paragraph 3.8 but also provided the opportunity for members of the public to discuss their views of development and planning policy giving their own knowledge and opinion of local issues.

Appendix 1: Issues Raised at Each Event

Online Event 22 January 2025

General Comments

- What plans are there to upskill and provide training of staff to meet the vision and objectives? What support will be available to assist with this?

- Why is CCR so involved? Why does Cardiff suck everything in from Caerphilly to Newport etc. It is turning into a one large conurbation and most assets drift to Cardiff.
- Will the growth be at odds with biodiversity and drainage issues? we are already seeing significant floods.
- Impact from large power lines in the uplands which has an impact upon peat.
- Development is always approved with conditions but there is no staff or resources to police them.
- Will the LDP fund these new developments?
- Withdrawal of funding for services is impacting upon communities.
- My concerns: I live in Oakdale, there has been an onslaught of developments, there are currently two underway - the load on the area is increasing yet infrastructure is not. The planners do not consider the impact to the existing communities and are effectively creating resentment which in turn will have a detrimental effect. From the point of view of Oakdale and Penmaen as our councillor is chair of the committee we are underrepresented and undefended.
- When liaising with planning and referring to their own planning documentation there is a lack of adherence to their own policies and plans.
- It all sounds good, but how will CCBC police developments to ensure they adhere to agreed conditions?
- Enforcement is a huge problem!
- I agree enforcement is severely underfunded.
- Developers view LDP as much easier route to gain planning than a direct planning application with its full consideration, which risks the implementation of the conditions.

Objectives

- Promoting leisure and health is good.
- How many objectives- and is there an easy short table of the issues they cover?
- I hope the protection etc. of the historic environment and nature at the end of the list is not an indication of priorities.
- Objectives always sound fine. Unfortunately, the policies and their implementation have not always met them in the past. How will Council make it different this time?
- Specific to leisure and health - closure of leisure centres rather than open spaces.
- Good to see the Historic Environment is within the Objectives. It's important to note that brownfield development proposals often (especially in S Wales) impact industrial archaeological remains.

- How will the success of these objectives be measured, and how will they be held accountable if they fail to meet them?

Housing

- What data is being used to identify needs e.g. Oakdale and North of the Borough. In Rhymney, the last affordable housing was in the 1970s and there is currently long housing waiting lists.
- There is a need to put development where the need is and not in areas where housing has occurred. There needs to be more housing in areas that need it.
- In the north of the Borough there is a lot of assisted living housing which is disproportionate to housing for young mums and families – New Tredegar to Rhymney.
- There are also a lot of HMO sites and development does not want to be in these areas.
- Infrastructure issues at present without more development e.g. there is a loss of libraries and services, Doctors and dentists are oversubscribed, schools are oversubscribed.
- Crosspenmaen - infrastructure is not there.
- People do not want to walk uphill in relation to development e.g. Oakdale.
- Development occurs in locations where people have no cars and there is no supporting infrastructure. Therefore, they are isolated as they have no alternative modes of transport.
- More town centre development – this would reduce car use and the less need for greenfield sites and its associated implications.
- There is a need to rethink the ideas of town centres and more local shops rather than solely in the town centres.
- Oakdale is full.
- Rhymney Growth – impact upon existing houses – overcrowding. There is a need for a joined-up community view particularly from the population that is already there.
- Need a mix of houses and not just 5-bedroom executive houses. Smaller houses are needed.
- Space for employment land was not there, one company could not find suitable land and had to move out of the Borough. Although workforce live in Caerphilly area they need to travel. This then exacerbates the infrastructure issues particularly road system. Also leads to unsustainable modes of transport.
- Employment needs to consider new opportunities in the town and settlement centres. There are many empty shops, therefore, there is a need for a more unified thinking to consider this option.
- Mixed use developments in the town centre. Empty town centre buildings suitable for redevelopment. This can also play a role for residential needs.

- Use the town centres for housing and some other uses and focus solely on retail or retail type uses rather than putting these other commercial uses on the outskirts of the town or settlement.
- Design of new housing important need to respect character, some new developments appear to be out of character with existing area.
- Oakdale cannot accommodate more growth – no land left except complex construction project – last greenfield site is being sold to developers for flats.
- Reuse of existing units above shops.
- It's the change of use of playing fields and leisure centres for housing but I understand it is also funding.
- We've encountered a similar issue, where planning applications near transport links and schools have been rejected, yet affordable housing is expected to focus on rural areas (so I was advised). This approach seems counterintuitive, as rural settlements often lack the infrastructure, public transport, and access to essential services like schools, healthcare, and employment opportunities that residents of affordable housing rely on. Placing affordable housing in rural areas can isolate residents, increase their cost of living, and create pockets of disadvantage.
- Our local neighbourhood has been flooded with new development, size is not compatible to the area and these are very much social housing and not so much affordable for first time buyers to buy.
- What has been the average delivery of housing per annum for the last 10 years in Caerphilly?
- Currently two developments of affordable housing underway - Linc Cymru and Caerphilly Homes sites. Affordable housing is required, but due to lack of infrastructure and support services - it creates social isolation. Apologies - one development is affordable / social - the other is social housing. It seems that as a borough we are lining the pockets of developers and social landlords - the social landlords openly admit that the developments are done on massing and profitability.
- Has the council managed to deliver the required social housing up until now? My concern is that it's very dependent on developers and their choice of geography.
- Are we still talking about affordable housing? it's all very well building 5 bed executive homes, but not much good to local people.
- All land left in Oakdale is affordable / social (more social than affordable).
- Smaller housing and apartments are needed.
- What are the plans for sustainable transport for around Oakdale area? Are they really encouraging new housing for people not to drive?
- There is a high focus on one bed, due to the massing element for social landlords - but this doesn't fit the general life cycle of a person - single person, meets another person, may want a child and then has no suitable home.

- Starter homes, 2 bed, community focused - with spaces for people to physically interact.
- This is the challenge in Rhymney. Lot of HMOS and one bed flats.
- Longevity of design - supporting the heritage of Wales.
- Is there any more information on the candidate sites - expected numbers etc.

Employment

- How does Wales attract businesses in general, and then specifically to the area. Are rates competitive - again, is the infrastructure there to support?
- Lack of employment land means business are located outside the Borough.
- Anecdotally there are some very run-down industrial estates round the Cwmcarn/ Cross Keys area that could be developed.
- There are 2 empty office spaces in Caerphilly town ideal for housing development, former Thomas Carroll building , Crescent Road and former DSS office Denscombe.
- I work in Bristol - better opportunities and better pay unfortunately.
- We moved our business employing 50 people from Caerphilly due to no suitable premises for growth.
- This starts way before we get to housing, we need to provide skills for our children and young people.
- Is there consultation happening with business owners on this objective?
- Repurposing existing structures is so important to help retain the character of the centre and to help reach net zero targets plus connecting easily with existing infrastructure.
- Newport for example- the business rates were so high that M&S moved out and many businesses moved or closed.
- Bargued town centre is dying worse than Caerphilly, again empty properties there could be used for housing, these are on main transport lines and help revive the town centre.

Infrastructure

- Roads and infrastructure are problematic. There are pinch points e.g. Blackwood to Treforest.
- Road infrastructure within basin is a concern.
- Lack of Public transport infrastructure - focusing housing sites and places where new / existing residents can travel without use or reliance on the car.
- The transport statements submitted currently are not realistic and contradict CCBC's own reports. People do not fly - so using crows does not fit the bill.
- Are there sufficient school spaces available in the areas where new housing is envisaged?

- Is there data regarding people moving into the area from external? i.e. over the bridge?

Settlement hierarchy

- I'm concerned about the expansion of the settlement boundaries and eventually urban sprawl reaching Cardiff and Newport.
- Engagement and understanding of the community need in the north of the Borough.
- Oakdale - they have extended the settlement boundary to maximise development.
- How can that disparity exist in one borough? North, we have had very little development and it sounds like Oakdale has the opposite.
- Due to the topography of the landscape there are limitations - for example travelling via Maesycymmer to Caerphilly - cross valley transport is still difficult - easy to go up and down a valley.
- What does local settlements mean?

Landscape and environmental issues.

- Landscape and environment conflict are an issues giant energy sites and environmental impact.
- Green farmland site should not be considered when there are plenty of other brown sites already owned by the authority or in the area that could be used in line with Planning Policy Wales.
- Also, the protection of historic and natural assets.
- Need to preserve the natural environment.
- Brownfield sites as a focus when viability allows.
- I feel the environmental objectives are at odds - how are huge windfarm complexes compatible with enhancing biodiversity and reducing flood risk?
- If CCBCs vision is based on greener attitudes, why are they looking to build on green sites going against Planning Policy Wales policies and the legal duty to enhance biodiversity under Environment Wales 2016, such as Nant y Calch Farm CB025, Caerphilly, when the housing provision of 49 houses on this site could be built on many other sites around the town. I can provide a list of other candidate sites near transport and employment.
- We also need to consider what these outlined areas on the LDP represent on the ground. While they might appear as green or brown belt areas on a map, the reality can sometimes differ significantly. For example, there are some areas marked as green spaces that, in practice, are not environmental or landscaped but are instead used for activities like illegal motorbike tracks or have become hotspots for anti-social behaviour. It's important we account for this reality to ensure accurate planning and decision-making.
- Net biodiversity is the new element in this LDP. The method and resources of assessing this right from design stage is crucial to delivery. I do not have

confidence in the council in this. without expertise, developers will run rings around planners.

- We're in climate breakdown and everybody will have to change behaviours and limit impacts, so we need to stop encouraging long journeys to retail parks etc. unless there is adequate transport links.
- A major problem last time which seems partly repeated is that there are some big brownfield sites which are suitable except that they have very high remediation costs. So, developer will only do it if they can get high value housing in return. So not developed thus far as other cheaper sites available, tricky for affordable targets.

Risca Primary School, 29 January 2025

General Issues

- Two places Ty Darren – Old petrol station with hardstanding on site. Silver Street a gated OAP house building on grassed area. Why are these sites not considered for development.
- Brownfield sites first before consideration of greenfield sites particularly where brownfield sites have services.
- Brooklyn Road cannot accommodate new development. Pipework and infrastructure are old and cannot cope. There are flood issues. No more intense drainage possible.
- These areas and other similar areas are not suitable for development, there is a need to assess these aspects before considering any development in such areas.
- Entrance and access in this area also an issue.
- There is a need to balance what is needed for towns and a balance of the issues.

Housing

- Increase and additional housing ok in principle but where will it go.
- Where will the houses go?
- What size will the houses be there needs to be an appropriate mix of houses, tenures, and size.
- Ageing society how many of this population are in large houses need encouragement to downsize and provide appropriate smaller units.
- Provide homes in the town centres. Also, village centre
- Need more affordable housing with a range of sizes, mix and tenures.
- Income will dictate the type of affordable housing that is required – there are “horses for courses” across the Borough.
- Older people need choice of houses.

Employment

- Town centres are tired and need a new vision.
- Need more jobs but there are also flooding issues to consider.
- A number of current sites are vacant or dilapidated.
- High Street is empty impact of internet and covid.
- Overall need for employment is agreed.
- Infrastructure will be a major constraint.
- Employment further up the Valleys may be better than in Caerphilly and Risca or south of the Borough.

Infrastructure

- Shortage of parking this will conflict with the need to reduce car use. Insufficient alternatives and there will always be a need to use cars. This can lead to on street parking problems across a wider area. Developments need to provide adequate car parking.
- Risca needs a car park.
- More housing equals more parking and more issues including illegal parking on yellow lines.
- Lack of and increased stress on services e.g. doctors - more houses will exacerbate this.
- More police needed if more people living here.
- Education will struggle to meet the needs of new families.
- There are not enough parks and we are losing green space. All new development would need to address these needs.
- Consultation has identified an ageing population but there is a shortage of public toilets.
- No public transport across the Borough, particularly in the north of the Borough.
- There are no facilities for teenagers or younger people.

Settlement Hierarchy

- There needs to be a wider spread of development, Caerphilly gets everything, and other parts of the Borough are forgotten.
- The west and east are forgotten everything is always south centric focussed.
- Development leads to merging of settlements there is a need for green space and gaps between them.
- Developers do not want to go north they only want to build in Caerphilly.
- Locations up in the valleys can feel isolated due to lack of and poor infrastructure. This increases commuting to the south of the Borough – this is unsustainable.

- Development and economy are not shared evenly across the Borough – South is affluent, and the north is forgotten.
- Hierarchy of settlements objected to.
- Villages are merging – where are the green spaces.
- Oakdale is full to capacity and cannot accommodate any more development.

Landscape and Environmental Issues

- Green policies implications of wind turbines, loss of countryside, “you can’t eat the countryside.”

Cwrt Rawlin Primary School, 3 February 2025

General Issues

- Greenfield sites on the edge of settlements and towns may be appropriate but needs to be clearly on the edge and not divorced by a significant distance.
- Housing
- Access on Railway Terrace and Warren Drive are an issue - 50 houses.
- Encourage housing within the town centre not all social housing as this will not boost the town centre there is a need for a mix of uses in the town centre.
- Total housing figures are not considered bad although affordable housing is a key requirement.
- In relation to affordable housing developers just build what they want.
- There needs to be a mix of housing delivery relation to size and 10 years and again infrastructure needs to be provided alongside these new developments.

Employment

- The type of employment is important we now experience more work from home how is this addressed housing is therefore important for work from home.
- Development sites should be brownfield site close to infrastructure for employment.
- Any development that gives children opportunities is good.
- There needs to be a mixture including high tech businesses.
- There needs to be a reduction in reliance on manufacturing which provides cheap labour.
- How do you attract businesses and investment for example Aston Martin left town centre is in decline accept that business rates is a major issue.
- Seems to be only attracting businesses that already exist and does not attract new businesses.
- No private entrepreneurs coming forward.
- Accept fiscal issues are a major constraint as well as planning.

- Service industries will need parking there is a shortage of parking in Caerphilly this also applies to other settlements.
- CCBC policy to try and increase town centre footfall but how can the planning and LDP encourage this?
- The definition of a town centre affects resource is and there is a need for a new vision for the town centre.
- Is retail such an important factor given close proximity to Cardiff for availability of retail.
- Blackwood facilities can be really reasonable foot fall is bigger than Caerphilly.
- There is a need for a regeneration strategy to get investment into the county.

Infrastructure

- Traffic is gridlocked around Caerphilly.
- There is a need for play spaces.
- Caerphilly is too built up.
- The schools are full and any new development will make this worse.
- There is also a shortage of medical services.
- Public transport is sporadic.
- Caerphilly only has one road in and one road out.
- Access is a major problem.
- Infrastructure already stressed before any new development infrastructure must come first.
- Lack of railway connections throughout the borough.
- Currently there are no hotels no theatres no nighttime economy this is an issue in providing a thriving town centre should also include community facilities however it is noted that we are losing key players.
- The suggestion to reduce parking when there is no public transport is an issue there is a need for greater public transport and only then will this allow for less parking.
- Towns don't have adequate infrastructure.
- Transport issues around Cardiff Road and St Martins Road, this is already a problem any new development will make this worse also leads to pollution issues.
- There are sewage issues in a strict manner including Victorian pipe work this is not considered to be able to cope with new development.
- What is happening on the road from the park and ride to Green Chapel.
- Upper Rhymney valley employment is in Merthyr Tydfil no public transport to Merthyr Tydfil.
- South Wales Metro - greater links are needed not just North and South.

Settlement Hierarchy

- Planning is too south centric, north of the borough keeps getting left out no investment elsewhere.
- No identified sites in Ystrad Mynach.
- Seems to be a lot of development for Caerphilly but Caerphilly is full.

Landscape and Environmental Issues

- LDP brownfield sites not attractive can promote edge of settlement greenfield sites.
- Right sites in the right place.
- Are there enough brownfield sites?
- Need access to green space in Caerphilly.
- Existing sites could be used.
- Nant Y Calch application - take down farm buildings - access is the major issue.

Bargoed YMCA, 5 February 2025

Housing

- Penpedairheol lots of objections to the candidate site.
- No problem overall with the housing numbers being suggested brownfield sites should be considered first or in all cases, if possible, there is no opposition to housing within the borough the key issue is where it will go there is a need for development in the right places needs to avoid clearly identified constraints such as environmental biodiversity and infrastructure issues.
- Previously legal issues in relation to culverts and drainage at Penpedairheol area.
- If there has an ageing population, why is there the need for all these new housing.
- Size of development should not be disproportionate to the size of the particular settlement.
- Penpedairheol drainage is a major issue streams causes problems there are sinkholes in mine shafts.
- With regard to affordable housing more social rent is a priority.
- It is important to ensure that affordable housing remains affordable too often developers seem to be able to reduce this or lose the affordable housing quarter of new developments.
- Developments can lead to a change in character.
- What are the affordable housing targets? Are these realistic?
- With regard to residential dwellings higher density development for residential would be appropriate.

Employment

- Employment - many of the current sites are empty.
- Same with employment there are transport infrastructure issues which would undermine businesses setting up.
- How are you going to encourage investment even if there is land available for employment.
- There is a need to look at redundant buildings and redundant sites first.
- Is any employment land or investment futile due to Welsh government approach?
- Why would you want to put more money into this area is it not better to make use of what is already there?
- There are lots of empty businesses at present why is there a need for more land development sites need to be sustainable.

Infrastructure

- Traffic and infrastructure problems already, new development will exacerbate this and air pollution is also a major issue.
- Surface water and flooding issues currently exist for example behind Hengoed Road.
- There's a need for appropriate traffic strategies.
- It is considered that the LDP has previously used out of date information in relation to highways and traffic issues have these now being updated? Are the current LDP considering up-to-date information?
- Infrastructure issues traffic schools, medical services all inadequate at the minute new development will cause further problems.
- Houses always come first before infrastructure the cart is put before the horse and infrastructure sometimes does not arrive.
- Setting of parks needs to be considered.
- A472 is a major road building in relation to this road which is already congested will lead to a problem.

Settlement Hierarchy

- No capacity for further development at Oakdale sites
- Landscape and Environmental Issues
- Need for protection on wildlife sites.
- Biodiversity issues how can building on Greenfield sites enhance biodiversity development is leading to the merging of villages losing distinctiveness of particular village.

Heritage

- Loss of heritage sites.

Twyn Community Centre, 19 February 2025

General Issues

- What has happened to the Caerphilly Town Council consultation has this been taken into consideration

Housing

- In relation to candidate sites do we get the names of who put forward the sites can other council departments submit sites.
- Who will provide the social housing on developments.
- There has been no loss of population there is a case that the LDP area is overpopulated.
- Conversion of empty town centre buildings to residential would also be a positive contribution.
- What is the justification for the current housing does this really identify housing needs or does it address in migration and commuting.
- Viability of schemes in relation to affordable housing, developers will often argue that it can't be provided there is a need to be providing adequate affordable housing there needs to be a clear definition of what is affordable housing and who it is for.
- Caerphilly is an attractive area to move into therefore attracting commuting and inward migration not attracting people from Wales attracting people to commute possibly across the border.
- Housing in the Borough is not addressing the needs of local people.
- Council is not managing the existing housing stock there are many vacant properties in the borough not being considered.
- Planning policy is trying to increase the economic population needs to go hand in hand with housing local jobs and local housing needs.

Employment

- With regard to employment, there is a need for some land for employment on retail etc.
- The provision of employment can help restrict commuting.
- There have been previous issues for example Pontypandy Road.
- All existing sites should be considered.
- Government offices are currently empty there is a need for the council to look at what buildings are vacant before looking at any new building.
- What will be the nature of the employment provided important to be mix of employment and training etc.
- There has been a loss of employment land to housing sites elsewhere.

Infrastructure

- What about social care needs to meet current and any future demands the plan should address this - age related and also learning disability etc.
- Poor public transport therefore there is difficult to be a modal shift away from cars there will always be a need for cars and development needs to be providing adequate parking spaces for these at the same time recognising the traffic congestion issues that can rise from extra development.

Settlement Hierarchy

- In relation to the settlement hierarchy Caerphilly has no services, no cinema no theatre etc.
- The north is forgotten, and the plan is too south centric.
- Accepted that infrastructure of north may not be as good however there is a need to look for the needs of residents and employees at the north of the borough.
- There is a case for more development including employment elsewhere up north in the South Wales valleys Heads of the Valleys Road is coming to completion surely this is a good means of bringing industry and employment to the north to allow access onto the road topography will dictate where the development should be
- Development tends to be pushed more towards the M4 corridor and links to Cardiff.

Landscape and Environmental Issues

- Former agricultural land has pollution issues in relation to agriculture.
- Water courses have been polluted by previous residential development this should be avoided.
- Water level has risen in local water courses and now floods occur whenever there's runoff, in addition, it erodes the bank leading to extra costs for landowners to repair.
- Before a new development there's a clear need for anti-flood measures to be put in place infrastructure has to come first historically development has come and the necessary infrastructure has not been provided.

Online, 19 February 2025

General Issues

- With regards to growth, census shows a reduction in population.
- The LDP needs to ensure it meets the placemaking agenda and the government policies of PPW and the Future Generations Act, it appears to just dip in and dip out.
- There is a greater need to work with the community.
- Need for sustainable development PPW clearly says this should occur, development should occur around transport hubs when you need to reduce car

use when you are building without a car but this does not seem to be followed. Cheaper options always pursued on greenfield sites.

- Needs to be encouragement to come out of car, there needs to be a mixed approach in how we achieve this given the public transport availability.
- We need to consult with pupils in the high school what do they want these people will be grownups at the time the plan progress is through are you discussing with this age group at present planning policies just seem to be sending people to Cardiff.
- Asking young people is important.
- The principles of PPW must be followed - need to consider and add to the sense of place better to use what is already here than new build.
- Once the vision is achieved it all becomes more to do with placemaking.
- Caerphilly is just one of five authorities in the Gwent area how do the other LDP developments relate to what is being proposed in Caerphilly and does CCBC take account of what's going on elsewhere so that there is no competition between local authorities.

Housing

- Who will be building all this housing for, we're building three to four bedroom houses not affordable houses and not providing the infrastructure that is needed for new development in particular housing or providing sufficient support social housing this is leading to a deteriorating standard of life.
- Flats above and behind shops small units can be a positive approach in meeting the housing needs of the Borough.
- The Maesycymmer development can provide several thousand houses which is the reason that developers are keen on this.
- Brownfield sites should be pursued first however contaminated land from number of the industries has implications e.g former pink works at Machen could accommodate 500 houses and school but developers are reluctant due to the pollution of the land.
- How many can be accommodated from windfall sites, so candidate sites are not needed, neither are Greenfield sites needed.
- There is a need for more affordable housing again, how can it be provided developers often look to try to reduce the amount they can provide there is a need for a robust policy to ensure what is being asked is provided and comes to fruition.
- Design is important there is a need for good high-quality housing, there is a need for a mix of houses to meet the housing need a range of sizes and 10 years not built on Greenfield sites.
- Residential settlements in Caerphilly can accommodate one and two-bedroom apartments. Parking - there is no parking available this is an issue across all wards of the Borough, there is a need to rely on public transport but this doesn't happen as it is not frequent or reliable. Fewer parking spaces won't put people

on trains, it's the cost that will put them off all will happen is people will continue to use cars leading to even greater congestion.

- There is a proposed site near me in Penpedairheol, I am concerned about the impact of additional vehicles on an already busy road and the impact of the infrastructure i.e. drainage etc.
- Existing LDP has about 5K houses not built. By my calculation over period of plan given population levels we need about 1.5K extra houses. So, land management and candidate sites over-exuberant again.

Employment

- Employment needed - more employment locations therefore this is a positive thing, housing should follow on.
- There is a need for jobs to bring younger people then you need premises for people to live there is currently a throw out of business places not just small start-ups or SMS but larger bigger businesses as currently this leads to people moving out the Borough.
- With regard to the workforce in an area it is important to look at the quality of the training and the skill mix of that area what type of employment is being looked at. At the present time are we looking to fit and grow on what we already have or look at new forms of employment.
- Need to look at the type of work as it is cheaper to live here.
- Therefore, infrastructure and training would be the key for any employment success what incentives are there for employers to come to seek to there is a need for future opportunities to allow career progression. Education can gear to that for example the old WDA role needs to be brought back a coordinated approach to ensure jobs and progression through life.
- Generally accepted there is a need for more jobs.
- There is a need to make the best use of the assets we've got - there is plenty of office building which is empty for example the old WLGA building are we using these existing spaces appropriately before we look at new development.
- Ageing population growth - young people needed therefore employment before housing.
- If housing comes first, simply means people move away to work.
- Does the borough want to become a service economy.
- Need a WDA to assist growth across region.
- There is a need for a new role for the town centre so it needs to provide a range of uses. The High Street as we know it has changed and is continually changing this could include housing restaurants more entertainment with some smaller retail less retail as it is more of an experience to attract people to the town centre rather than simply come to shop it is acknowledged that business rates are an issue.
- Need to utilise existing buildings and new build side by side not simply look at a new build answer.

- Market demand will be a big issue in how employment and commercial activities progress.
- The requirement for small employment units craft workshops etc all need to have a different plan.
- Use heritage and its surroundings as a catalyst for new development. Tourism could be a major player within an economic strategy for example what is the strategy what do you want marketplace etc or commuter location needs to decide what settlements and towns are and then plan accordingly.

Infrastructure

- The road system is poor and leads to bottlenecks possibility to relieve congestion.
- Development with a spine road still needed.
- Caerphilly gridlocked - bypass is not being built.
- Anything north converges on a single bypass road leading to rat runs which are becoming more and more frequent and compounded by more building the latest census results reduces the need for housing within the borough.
- The Borough has the largest commuting population - greater than 55% commute out of the county, some out of Wales. It is considered that this will drive jobs down as people are commuting out.
- Infrastructure is a major issue this needs to be in place prior to development.
- How can we manage the highways and the traffic congestion.
- Infrastructure is not just roads there's a shortage of doctors' appointments, dentists, school education, all these are major issues - new development must have appropriate infrastructure and that infrastructure must come first any new development has an impact on the services provided for both new people and existing residents.
- Caerphilly town and area gridlocked frequently. Southern by-pass never built.

Settlement Hierarchy

- North of the valley there's the Heads of the Valleys Road but developers are not going up there and it is much harder to push developers north, there is a need for homes up north including Rhymney.
- Top of the valley needs to be addressed with regard to its needs. Village centres - large number of void properties need to look at different uses to provide a mixed economy in both towns and village centres.
- This relates to the boundary alterations and how change of representation has occurred.

Landscape and Environmental Issues

- Flooding is a major issue across the borough across the borough this will only be exacerbated with any new development it is important that developments meet suds to ensure there is not just river flooding but surface water flooding.

- Another concern is the impact on the environmental landscape, we already are seeing a decrease in green spaces this will add to it.
- Heritage
- Are we making most of the heritage assets in particular Caerphilly castle at present coaches just arrive and leave there is a need to encourage the visitors to stay in use other facilities within Caerphilly, thereby making the town more attractive for restaurants entertainment matters such as this there needs to be a blend of employment and housing to make it more attractive for people to want to come and stay in work in Caerphilly.

Appendix 2 Invitation to Events

Dear RLDP Consultee

Caerphilly County Borough 2nd Replacement Local Development Plan Up to 2035

Pre-Deposit Plan (Revised Preferred Strategy)

2il Gynllun Datblygu Lleol Newydd Bwrdeistref Sirol Caerffili Hyd at 2035

Cynllun Cyn-Adneuo (Y Strategaeth a Ffeirir wedi'i Diwygio)

Dweud eich dweud ar Ddyfodol Bwrdeistref Sirol Caerffili!

Mae Cyngor Bwrdeistref Sirol Caerffili yn lansio Strategaeth a Ffeirir wedi'i Diwygio y Cynllun Datblygu Lleol Newydd. Mae hwn yn cynnwys targedau ar gyfer tai newydd, swyddi yn ogystal â materion amgylcheddol, hinsawdd a diwylliannol. Y cyfnod ymgynghori yw dydd Mercher 15 Ionawr 2025 - dydd Mercher 26 Chwefror 2025.

I ategu'r broses ymgynghori rydym ni wedi cael ein comisiynu i hwyluso cyfres o ddigwyddiadau gweithdy ymgysylltu cymunedol yn ystod Ionawr a Chwefror. Mae manylion y digwyddiadau hyn fel a ganlyn:

Dydd Mercher 22 Ionawr 2025 10am -12pm Ar-lein

Dydd Mercher 29 Ionawr 2025

6 – 8pm Ysgol Gynradd Rhisga, Heol Dan-y-Graig, Rhisga NP11 6DB

Dydd Llun 3 Chwefror 2025,

6 - 8pm Ysgol Cwrt Rawlin, Heol Cae Croes, Caerffili CF83 1SN

Dydd Mercher 5 Chwefror 2025

6 - 8pm YMCA Bargoed, 12, Aeron Place, Bargoed CF81 8JA

Dydd Iau 13 Chwefror 2025

2 - 4pm Canolfan Gymunedol Twyn, Sgwâr Twyn, Caerffili CF83 1JL

Dydd Mercher, 19 Chwefror 2024 6 - 8pm Ar-lein

Nid yw'r digwyddiadau wedi'u targedu i drafod meysydd y lleoliad yn unig ond byddant yn edrych ar y Sir yn ei chyfanrwydd ac mae croeso i chi fynychu unrhyw un o'r digwyddiadau hyn.

Er mwyn ein galluogi i gael syniad o niferoedd gofynnwn i chi chi gadw lle drwy ddefnyddio'r ddolen ganlynol a dewis eich dyddiad o ddewis yma>>

Os oes gennych chi unrhyw ymholiadau neu os nad ydych chi'n gallu mynychu unrhyw un o'r digwyddiadau uchod cysylltwch â mark@planningaidwales.org.uk

Rydym yn gofyn i drigolion ag unrhyw anghenion penodol fel mynediad, dolen glyw, angen cyfleusterau cyfieithu neu'n dymuno defnyddio'r Gymraeg yn y digwyddiad gysylltu â'r mark@planningaidwales.org.uk

Caerphilly County Borough 2nd Replacement Local Development Plan Up to 2035

Pre-Deposit Plan (Revised Preferred Strategy)

Have your say on the Future of Caerphilly County Borough!

Caerphilly County Borough Council is launching the Replacement LDP Pre Deposit Revised Preferred Strategy. This includes targets for new housing, jobs as well as environmental, climate and cultural matters. The consultation period is Wednesday 15 January 2025 – Wednesday 26 February 2025.

To supplement this consultation process we have been commissioned to facilitate a series of community engagement workshop events during January and February. The details of these events are as follows:

- Wednesday 22 January 2025 10am – 12pm Online
- Wednesday 29 January 2025
- 6 – 8pm Risca Primary School, Dan-y-Graig Road, Risca NP11 6DB
- Monday 3 February 2025
- 6 - 8pm Cwrt Rawlin School, Cae Croes Heol, Caerphilly CF83 1SN
- Wednesday 5 February 2025 6 - 8pm Bargoed YMCA, 12, Aeron Place, Bargoed CF81 8JA
- Thursday 13 February 2025

2 - 4pm Twyn Community Centre, Twyn Square, Caerphilly CF83 1JL

Wednesday 19 February 2024 6 – 8pm Online

The events are not solely targeted to discuss the area of the venue but will be looking the County as a whole and you are welcome to attend any of these events.

To allow us an indication of numbers please can you reserve / book a place by using the following link and selecting your preferred date here>>

If you have any queries or are unable to attend any of the above events, please can you contact mark@planningaidwales.org.uk.

We ask that residents with any specific needs such as access, a hearing loop, need translation facilities or wish to use Welsh at the event to contact mark@planningaidwales.org.uk

APPENDIX 2: KEY DATES FOR THE PREPARATION OF THE DEPOSIT PLAN

Pre-Deposit Consultation Close	Wed 26 February
3rd call for Candidate Site submission deadline	Wed 26 February
Sites and additional information circulated for assessment	Fri 14 March
Deadline for addressing reps	Fri 11 April
Service area assessment of Candidate Sites deadline	Fri 25 April
Additional information requested from Site Promoters	Mon 28 April
Cabinet Briefing on Candidate Sites	Mon 19 May
Full Council meeting on Initial Consultation Report	Tue 20 May
Members Candidate Sites Seminars – Heads of the Valleys	Tue 27 May
Members Candidate Sites Seminars – Lower Ebbw and Sirhowy Valleys Masterplan Area	Thu 29 May
Commence drafting Deposit Plan & Maps	Thu 29 May
Members Candidate Sites Seminars – Caerphilly Basin Masterplan Area	Mon 02 June
Members Candidate Sites Seminars – Ystrad Mynach Masterplan Area	Wed 04 June
Members Candidate Sites Seminars – Greater Blackwood Masterplan Area	Thu 05 June
Deadline for submission of additional evidence For Candidate Sites (not ecology)	Fri 06 June
Circulation of additional evidence for Service Area assessment	Mon 09 June
Deadline for Service Area assessment of additional evidence	Fri 04 July
Deadline for submission of ecological evidence on Candidate Sites	Fri 04 July
Deadline for Service Area assessment of ecological evidence	Sat 02 August
Finalise Candidate Sites assessment	Fri 15 August
Deadline for identifying plan allocations	Fri 22 August
Cabinet Briefing on Sites and Deposit Plan	Mon 20 October
LDP Focus Group Meeting on Sites and Deposit Plan	Thu 30 October
Deposit Council Meeting	Tue 13 January
Deposit Consultation Start	Wed 28 January
Deposit Consultation Close	Wed 11 March