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This Statement of Common Ground has been prepared to identify the areas of agreement between Countryside Council for Wales (CCW) on matters relating to the Blaenau Gwent Deposit Local Development Plan and the representations submitted by the Countryside Council for Wales concerning that document. A meeting was held on 27th October 2011 between CCW and Blaenau Gwent to discuss the main objections raised by CCW.

The changes and the Council's agreed response to each are included in Appendix 1 attached. The outstanding issues between Blaenau Gwent and Countryside Council for Wales are set out below.

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The Council have agreed to amend objective 12 as set out in FC5.A. Although the Countryside Council for Wales welcome the amended objective CCW recommend that FC5.A is amended to read 'The valuable landscape of Blaenau Gwent has been protected, enhanced and managed and together with

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To address this representation the Council agreed to amend Policy DM15 as set out in FC5.F. Whilst CCW welcome the intention to amend the policy to ensure that the Plan makes provision for protecting species, it is not considered that the proposed changes adequately reflect national planning policy. It is recommended that the policy is amended by:

- (i) Replacing priority habitats and species in the last line of criterion 2 with 'habitats and species of principle importance for biodiversity in Wales'
- (ii) Inserting a new criterion 3 which clarifies that proposals which are likely to result in disturbance or harm to a protected species or its habitat will be assessed in accordance with national planning policy.
- (iii) Additional text should be added to the policy amplification to expand on this and state that national policy is as set out in Chapter 5 of Planning Policy Wales and Chapter 6 of Technical Advice Note 5.

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The Council have agreed to make this change as set out in MC19. However CCW require an additional statement at the end of the paragraph to confirm that there is no difference in the status of river SINC's and terrestrial SINC's. It is considered that this is best dealt with through a written representation to the focussed changes consultation.

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APPENDIX 1 – BLAENAU GWENT AND COUNTRYSIDE COUNCIL FOR WALES AREAS OF AGREEMENT TO THE DEPOSIT LOCAL DEVELOPMENT PLAN

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			<p>application discussion stage. It should also be recognised that the following factors will assist in delivering the 50 ha of employment land:- The new Convergence Programme of EU funding 2015-2020 which is likely to provide funding for business property development · The recent designation of Blaenau Gwent as an Enterprise Zone with a combination of measures and funding which will prove attractive to businesses· Major improvements planned for the A465 Heads of the Valleys Dualling which will improve connectivity for the area. It will run through Rassau Industrial Estate and is therefore very close to some of the employment designations.</p>	
205	SP1	<p>Emphasis on regeneration and growth in Northern Corridor giving perception that the Plan is all about development not sustainability. No reference to natural environment i.e. 2 SINCs in Northern Corridor.</p>	<p>Agree. Para 6.6 amended (see FC5.B)</p>	<p>Agree to the proposed focussed change (FC5.B)</p>

Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
207	SP2	Suggests improved wording for criterion (f) of SP2. It should be amended to read ' by protecting and enhancing the built heritage and natural environment'	Agree. SP2, criterion f amended (see MC.5)	Agree. We consider that the proposed changes meets ToS CE1.
210	SP4 & SP5	Concerns regarding the proposed level of housing provision and its delivery during the plan period. Annual average completion rate from 1980 - 2009 was 140 units but 244 units required per annum to meet target of 3,666 houses for LDP period	It is accepted that the housing level is challenging but unless the Council plans to meet these higher levels the area will continue to decline. It should be noted that	

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218	SP10	To provide greater clarity to the text 'compensatory provision equivalent....' in the 9th line should be amended to read 'compensatory provision equivalent in value to that lost...'. (To meet ToS C2)	Agree. Paragraph 6.68 has been amended (See FC5.E)	Agree We consider that the proposed change meets Test of Soundness C2.
223	SP13	Given that national policy seeks to minimise the amount of waste being generated, such a high allocation of land (above RWP requirement) appears to contradict national policy, and be contrary to Test of Soundness C2.	Disagree. The idea that a high level of land for waste recycling facilities contradicts national policy is incorrect. The availability of land will not create waste generation, as in determining any future planning application Policy DM21 requires there is a proven local and regional need for any facility. The Plan is required to provide 4ha to accord with the Regional Waste Plan requirement for land to meet the needs of more than one authority. The site identified has been selected as part of the HoV organics project to be offered as an optional site for use for a facility(ies). It should be noted that the n t the 8 be oaeet tnq'7Rt9BB'Re9-Rt9BVR 9BMVRt9BVRU·R AS [Ro9-RRo9·RB'Re9--VVR R8	

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Rep No	Chapter / Policy	Summary of Countryside Council for Wales Representation	Councils Response	Countryside Council for Wales Response
242	DM15	Welcomes its general intention but recommend, for improved clarity, that the second sentence of this paragraph is amended by inserting at its start: "Proposals which are likely to have a significant effect on"	Agree. Para 7.82 amended (see FC5.G)	Agree We consider that the proposed change meets Test of Soundness CE1.
248	DM19	Paragraph 52 of the Minerals Planning Policy Wales (2001) also identifies nature conservation as an appropriate after-use. This should be reflected in paragraph 7.96	Agree. Para 7.96 amended (see MC.20)	Agree We consider that the proposed change meets of Test of Soundness C2.
251	DM21	Recommends that criterion 6(a) is amended by replacing "alternative transport modes" with "sustainable transport modes" (to meet Test of soundness CE1)	Agree. Policy DM21 criterion 6a amended (See MC.21)	Agree We consider that the proposed change meets Test of Soundness CE1.

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252		<p>The plan contains no policies on landscape Protection and enhancement; Historic landscape, or developments in proximity to the BBNP and no logical flow from the plan's vision through to its policies, or recognition of cross boundary issues -</p>	<p>Disagree. There is already a policy in the LDP which deals with the protection and enhancement of the Natural Environment. This covers the landscape (including historic landscapes) of Blaenau Gwent. Policy SP10 Protection and Enhancement of the Natural Environment states that ...' designated landscapes will be protected and, where appropriate, enhanced'. It is acknowledged that there was no specific reference to BBNP previously in the Deposit Plan but policy SP10 paragraph 6.66 has been amended (see below) to refer to BBNP in response to another representation (46D.44). Designated landscapes include local designations such as Special Landscape Areas as well as national designations such as national parks. Relevant authorities have a legal duty under section 62(2) of the Environment Act 1995 to have regard to the purposes for which National Parks are designated. Thus any development within Blaenau Gwent should not have an unacceptable impact on the setting of Brecon Beacons National Park which is in close proximity. It should be noted that objective 12 has been amended (see below) in response to another CCW representation (10D.184) regarding a failure for the objectives failing to flow logically overall from the plan's Vision. "The valuable landscape and natural heritage of Blaenau Gwent has</p>	<p>Agree Subject to the focussed changes being taken forward, we consider that landscape is addressed in various parts of the plan.</p>

Rep No	Chapter / Policy	Summary of Countryside

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258	MU1	Concerned about the potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 and T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC into countryside to the W & S of Ebbw Vale	Disagree. Chapter 9.0 identifies the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations. The change requested is therefore not appropriately located in this table. This issue is to be addressed in the survey requirement table where we identify that a project level HRA will be required.	We welcome the proposed changes to Chapter 9 to clarify the need for a project level HRA.
259	R1.1	In combination with the Rhyd y Blew SINC, the site provides an important link within the area for ecological connectivity. Concerns raised about cumulative loss of connectivity resulting from this and the proposed allocations MU1 and EMP1.8.	Disagree. This issue is to be addressed in the survey requirement table where we identify that a project level HRA will be required.	We welcome the proposed changes to Chapter 9 to clarify the need for project level HRA.

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271	EMP1.8	Consider that development at this site & the proposed roadside services (part of allocation 'MU1') will undermine the existing physical separation between Tredegar & Ebbw Vale & increase the potential for & perception of coalescence between them.	Following a meeting with CCW it has been agreed to widen the green wedge in this area. The boundary of the green wedge should be amended to extend to the HoV Road, incorporate part of EMP1.8 employment allocation, an area of open space immediately south of the HoV Road, together with land identified as open space at Bryn Serth. The revised boundary will reinforce the buffer between the two settlements of Ebbw Vale and Tredegar and improve connectivity. The amendments to the employment allocation and green wedge boundary is shown on the Maps 5 and 6 attached at Appendix 3. See FC10B & FC10.C	Agree.
272	EMP1.8			

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273	EMP1.8	Concerned about potential cumulative impact of development identified in allocations MU1, EMP1.5, EMP1.8 & T6.1 on the commuting and foraging opportunities of any bats moving from the Usk Bat SAC to area W and S of Ebbw Vale.	Following a meeting with CCW it has been agreed that the green wedge will be widened in this area. (see FC10.A, B & C).It was also agreed that amendments to the survey requirements table in chapter 9 are made to indicate that a project level HRA is required for this site, MU1, EMP1.5 and T6.1. These changes together with the wording changes being suggested to MU1 (see FC10.B) addresses the concerns raised by CCW.	Agree.
274	EMP2.13	To ensure ecological connectivity, consistent with DM16, it is recommended that any development at this allocation (Cwm Draw Industrial Estate) should avoid the area of woodland within the site.	Disagree. The purpose of policy EMP2 is to protect sites for employment use in line with their status in the employment hierarchy. The sites are therefore not listed within Chapter 9.0 or the site descriptions document. Any future development within the site boundary of EMP2.13 will be subject to the development management policies of the Plan. DM16 and DM17 cover the protection and enhancement of the green infrastructure and trees, woodland and hedgerow. Therefore the suggested amendment is considered unnecessary.	Agree.

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275	EMP2.14	Any development at EMP2.14 (Marine Street Industrial Estate) should seek to maintain the integrity of the adjacent 'Ebbw River South Section' SINC, and retain landscape features which also provide ecological connectivity.	Disagree. The purpose of policy EMP2 is to protect sites for employment use in line with their status in the employment hierarchy. The sites are therefore not listed within Chapter 9.0 or the site descriptions document. Any future development within the site boundary of EMP2.14 will be subject to the development management policies of the Plan. DM15 and DM16 cover the protection and enhancement of the natural environment. Therefore the suggested amendment is considered unnecessary. .	Agree.
276	ED1.2	With reference to policies DM15 and DM16, recommends that any development at 'Lower plateau Six Bells Colliery Site' should avoid the River Ebbw Fach SINC, and ensure that a landscape buffer is retained along the edge of the SINC.	Disagree. The part of the site that is designated as a SINC is the River Ebbw Fach, therefore development is not appropriate in this location. However in terms of providing appropriate landscaping buffering this should be reflected in the site description of ED1.2. The purpose of Chapter 9.0 is to identify the infrastructure needs, phasing of development, funding sources and who is responsible for the delivery of the allocations rather than specific site requirements such as landscaping.	Agree.

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295	M3	<p>Recommends that the LDP states that although outside a site designated for its national or international importance, development can still have a significant impact on such sites & any proposals will need to be considered for environmental impact.</p>	<p>Disagree. This policy identifies the areas where coal working is not acceptable. Policy DM19 will be used to guide where coal working may be acceptable and the impact on designated sites will be taken into consideration at this stage. An additional sentence within the reasoned justification of this policy will not improve the soundness of the Plan.</p>	<p>Agree. Subject to the retention of DM19 and a clear statement that the Plan should be read as a whole.</p>
297	M4.2	<p>There are a number of issues with the access to the site within Torfaen, which is likely to result in the loss of an area of ancient woodland. Additional detail outlining the constraints of the site more fully is provided in the LDP.</p>	<p>Disagree. CCW request that the issues regarding the access of the site which involve the loss of an area of ancient woodland should be covered in the reasoned justification. The reasoned justification makes it clear that the development of this site is dependent on Torfaen granting planning permission although it is accepted that this is one outstanding issue to be addressed there may be other issues which may lead to a refusal by Torfaen County Borough Council. It is therefore suggested that no additional information should be included.</p>	<p>We agree that no additional information is required.</p>

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298		Recommend that the trigger point (in Appendix 1 Objective 12) to consider review of the policy for Indicator 'LI19' should be lowered to a figure that more accurately recognises the significance of biodiversity losses in the County Borough.	Agree. Reduce the trigger point in LI 19 from '-25%' to '-10%'.	Agree.
299		Recommends that the trigger point to consider review for Indicator 'LI20' should be amended to:- any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010.	Agree. Delete 'no trigger' and replace with 'any permission granted under Regulation 62 of the Conservation of Habitats and Species Regulations 2010''	Agree. We consider that the proposed change meets Tests of Soundness C2.