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Your Ref: RM/KJM
21 January 2013

Dear Rob

**Torfaen Local Development Plan
- Consultation on Statement of Further Focussed Changes, (Dec2012)**

Thank you for your letter of 30 November and the related documentation you have provided. We note that the Statement of Further Focussed Changes (including minor changes) is accompanied by an updated SA Report which considers the proposed changes and HRA Screening Report.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. We have considered the proposed Further Focussed Changes in the light of the representations we made to both to the deposit plan (RepNo:0067) and to the Statement of Focussed Changes, and in accordance with the consistency and coherence & effectiveness tests (principally in accordance with whether satisfactory regard has been given to national planning policy - test C2).

The decisions by Council to revert to the Deposit Plan position with regard to the South Sebastopol Strategic Action Area and to include provision for Gypsies and Travellers based upon up-to-date evidence are supported. The enclosed annex provides the detail of our response.

Yours sincerely



Mark Newey
Head of Plans Branch
(enclosure – annex)

Annex to WG letter (21 January 2013) in response to the Torfaen LDP Statement of Further Focussed Changes (Dec2012)

The statement of Further Focussed Changes has been considered in the light of the representations we made to the deposit plan (RepNo:0067) and to the focussed changes, and in accordance with the consistency and coherence & effectiveness tests (principally in accordance with whether satisfactory regard has been given to national planning policy - test C2).

1. South Sebastopol

- 1.a. Our representation to Focussed Change FC16 (policy SAA6 South Sebastopol Strategic Action Area) has been adequately met by the proposed changes:

With regard to the **South Sebastopol SAA**, we note that:

- the introduction contained in the Statement of Further Focussed Changes advises that on 23 October 2012 the Council resolved to **reverse FCs16a-16r** which sought to delete South Sebastopol from the LDP and revert to the original Deposit LDP position as being the Council's final opposition with regard to this site;
- proposed **FCs46a-46g** relate to consequential changes to reinstating South Sebastopol SAA6;
- with proposed minor amendments **MA26-29**.

We consider this action necessary given that there was no evidence/justification for the change in position with regard to South Sebastopol between deposit and focussed changes.

- 1.b. New representation: Minor Amendment MA28 proposes additional text to Appendix 1 of the Deposit LDP in relation to the South Sebastopol SAA refreshed planning application and appeal. Given that the LDP should reflect the position at adoption, the relevance of this information to the adopted plan is questioned. It is for the LDP examination to determine the appropriateness of the allocation and phasing based upon evidence for its deliverability. There is reference to a delayed commencement date yet with no change to the housing number to be delivered in the plan period (690). The Council need to evidence this optimistic position.

2. Gypsy & Traveller Sites

Our deposit plan representation relating to gypsy traveller sites (WG Deposit Rep0067/10-12 re WG Deposit Letter Rep B.iii. Gypsy Traveller Sites) has been adequately met in the main by the proposed changes (our FC response refers), (the exception being with regard to Rep 0067/13 (H8 proposals) – see our FC response).

With regard to **gypsy & traveller sites**, we note:

- proposed **FC47a-47b** relating to an updated evidence base with revised pitch need figures and the allocation of a new Gypsy & Traveller site (H7/2, on PM);
- proposed **FC48a-48b** relating to an allocation for a replacement playing field resulting from the H7/2 allocation.

3. Implementation & Monitoring

We would reiterate our FC response with regard to implementation and monitoring. -

WG Deposit Rep0067/18 re WG Deposit Letter Rep C.ii. Implementation & Monitoring;
(Report of Responses – Ch10, issues 1&2, page338).

We noted in response to the proposed focussed changes consultation that FC35 (monitoring framework – new Appendix) does provide improvements to the proposed monitoring framework; that Rep 0067/18 is maintained; that whilst FC35 does provide improvements to the proposed monitoring framework, we suggest that it is for the examination to consider the content.

We note that the Further FCs propose some detailed changes to the framework, the appropriateness of which should be considered at examination.

4. Housing Allocation Statistics

We note that minor amendment **MA29** of the Further FCs now provides the **Housing Sites table** proposed for **Appendix 11** of the Plan. This in principle meets part of our **Deposit Rep0067/24**; we suggest that it is for the examination to consider the content.

(See our FC response regarding WG Deposit Rep0067/24 re WG Deposit Letter Rep D.ii. Housing & Employment Allocation Statistics; (Report of Responses – AppA,), in which we maintained Rep0067/24, and noted that MA7b & MA7c proposes the provision of 2 tables at Appendix 11 of the Plan; however, these have not been made available for scrutiny).
