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Jeanette John – Programme Officer
Blaenau Gwent County Borough Council
Local Development Plan Examination
The Works Site,
Steel Works Road
Ebbw Vale
Blaenau Gwent
NP23 6YL

Ein cyf/Our ref:

Eich cyf/Your ref: ED.34

Dyddiad/Date:

14 September 2012

Annwyl /Madam / Dear Madam

**Blaenau Gwent County Borough Council's Local Development Plan Examination,
Consultation on Matters Arising Changes During Examination Hearings**

Thank you for consulting us on the above. Having reviewed the document, our comments are as follows:

MAC S04 SP10

Page 42 of the Written Statement (as amended by Focussed Changes) includes point (f) "Ensuring development proposals do not have an unacceptable adverse impact upon the water environment and contribute to improving water quality where practicable." This point has not been included as point (g) in MAC S04. MAC S04 should be amended to include this point, otherwise we consider that the Plan is unsound.

MAC S30 Appendix 2

Page 17 - **To ensure the protection, preservation and enhancement of the natural environment**, in order to facilitate effective monitoring, the Monitoring Source Indicator (Source Data) number 5 should relate to all water bodies not just groundwater. Therefore, number 5 should be amended to "Percentage of ~~groundwater~~ **water bodies** of good status".

Page 12 – **To avoid development in areas at high risk of flooding**. We note that one of the annual monitoring targets for the monitoring indicator on development permitted in DAM zones C1 and C2 has been removed (from that in the Written Statement as amended by Focussed Changes). The second target is necessary to provide a focus for monitoring less vulnerable development in C2 and all development in C1 which is permitted contrary to TAN15. Therefore, the second target should be reinstated as follows:

" 100% of those permitted to meet the just