



# **MERTHYR TYDFIL COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN 2006 - 2021**

## **ADOPTED PLAN**

### **SUSTAINABILITY APPRAISAL (SA) STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)**

## **Final Sustainability Appraisal Report May 2011**

### **Appendix 14**

#### **SA of Proposed Changes arising from the Programme of Further Work (Volume 3: July 2010)**

Prepared by:

*enfusion*



**MERTHYR TYDFIL COUNTY BOROUGH COUNCIL**  
**LOCAL DEVELOPMENT PLAN 2006-2021**  
**ADOPTED PLAN**

**SUSTAINABILITY APPRAISAL (SA) incorporating**  
**STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)**

**Final Sustainability Appraisal Report**

**Appendix 14**  
**SA of Proposed Changes arising from the**  
**Programme of Further Work**  
**(Volume 3: July 2010)**

*For and on behalf of Enfusion Ltd*

<i>date:</i>	<i>May 2011</i>	
<i>prepared by:</i>	<i>Barbara Carroll</i> <i>Toney Hallahan</i> <i>Liz Payne</i> <i>Alastair Peattie</i>	
<i>checked by:</i>	<i>Barbara Carroll</i>	

*enfusion*  
environmental planning and management for sustainability



Treenwood House  
Rowden Lane  
Bradford on Avon  
BA15 2AU  
t: 01225 867112  
[www.enfusion.co.uk](http://www.enfusion.co.uk)

## Examination of Merthyr Tydfil Local Development Plan 2006-2021

### Programme of Further Work - Sustainability Appraisal of Proposed Changes

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#### 1.0 Purpose of the Report

- 1.1 Merthyr Tydfil County Borough Council has prepared policy changes in response to the programme of further work identified in relation to the Examination of the Merthyr Tydfil Local Development Plan. This programme was agreed with the Inspector after the Examination Hearing Sessions which took place between November 2009 and February 2010. The changes were forwarded to Enfusion Ltd to determine if there were likely to be any significant sustainability effects arising from those changes to the plan. A screening assessment of each proposed policy change was undertaken; this considered the significance of the policy change and whether there was likely to be a significant sustainability effect as a result of the change.
- 1.2 The Screening Assessment is provided at Appendix 1 and summarised below. It was considered that most of the changes were minor in nature and/or provided clarification of policies and the supporting text or made changes which improved the overall sustainability of the relevant policies.
- 1.3 Policy AS24: Employment Site Protection and Policy TB13: Exception Sites for Affordable Housing are new policies, and as such, detailed appraisals have been carried out which can be found in Appendix 2. The findings of the appraisals are summarised in section 2 below.
- 1.4 **Policies Screened**
- Policy BW14: Managing Employment Growth
  - Policy AS14: Employment allocations in the Primary Growth Area.
  - Policy AS24: Employment site protection
  - Buffer strips and Policy TB9: Buffer Zones
  - Policy BW10 and Safeguarding Areas
  - Policy TB8: Minerals Proposals
  - Policy AS19: Merthyr Tydfil Town Centre
  - Policy BW6: Townscape And Built Heritage
  - Policy BW7: Sustainable Design And Place Making
  - Policy BW16: Protecting /Enhancing The Network Of Leisure Facilities
  - Policy BW17: Securing Community Infrastructure Benefits
  - Policy BW18: Contaminated Land
  - Policy AS6: Local Nature Conservation Designations
  - Policy AS7: Waste Management Facilities – Locations Of Choice
  - Policy AS9: Strategic Highway Improvement
  - Policy AS12: Public Transport



- Policy AS13: Life-Long Learning Facilities
- Policy AS16: New Leisure Developments
- Policy TB2: Unallocated sites within settlement boundaries
- Policy TB3: Changes of use within settlement boundaries
- Policy TB5
- Policy TB10: Waste Management Sites
- Policy TB11: Access, Parking And Accessibility Of Local Facilities
- Policy BW19: Affordable Housing Target
- Policy AS22: Affordable Housing Contributions
- Policy TB13: Exception Sites for Affordable Housing
- Policy AS20: Retail allocations
- New Paragraphs: Unstable Land

## 2.0 **Summary of Screening Assessment**

### ***Policy BW14: Managing Employment Growth***

- 2.1 The Council have carried out a thorough review of the employment land requirement for the County Borough and have adjusted the total of land allocated accordingly. The intent and purpose of the policy has not changed and an adequate supply of land is still proposed. It is considered that no further SA is required.

### ***Policy AS14: Employment allocations in the Primary Growth Area.***

- 2.2 As noted above, the Council have carried out a thorough review of the employment land requirement for the County Borough and have adjusted the total of land allocated accordingly. Concurrently the Council have also carried out a review of their allocated sites for employment use and reassessed their deliverability. The changes to this policy reflect the review undertaken and propose the deletion and inclusion of sites for reasons which are clearly set out in the Proforma. The purpose of the policy has not changed and it is not considered that further SA is required. Changes to appendices 3, 5 and 7 simply alter the data to reflect the policy changes above.

### ***Policy AS24: Employment site protection***

- 2.3 The Council have decided that a new policy to protect existing employment sites is necessary to ensure the economic and employment prospects for the Borough. The SA (Appendix 2) found that beneficial effects are predicted for most SA objectives through the protection and retention of existing employment premises and the opportunity presented to achieve a wide range of employment opportunities within the Borough. No negative or adverse effects were identified.

### ***Buffer strips and Policy TB9: Buffer Zones***



- 2.4 Consideration has been given to the introduction of a policy for buffer strips and clarification of the role of buffer strips in relation to designations of national importance, the requirement for prior extraction and the issue of flexibility as raised in MTAN2. However it was decided that the buffer strips are not necessary and that the current policy TB9 is sufficient with minor changes to wording. The original SA found Policy TB9 to be “a very specific policy which seeks to ensure that mineral resources are not sterilised through inappropriate development. The policy will have a positive impact with no identified adverse impacts.” The minor changes to the wording further improve the policy through the omission of the word “normally”.
- 2.5 Deletion of the buffer zones on the proposals map will not have a significant effect on the performance of the policy as the supporting text has now been altered to refer to MTAN2 and buffer zones are still clearly specified. It is considered that no further SA is required.

#### ***Policy BW10 and Safeguarding Areas***

- 2.6 Policy BW10 has been re-worded in order to make clear that its role is to safeguard minerals. The policy justification has also been revised to provide a clearer and more succinct explanation behind the safeguarding policy and proposals. Finally, to maintain consistency with national policy and aid the plan user, explicit cross reference is made to other related plan policies and national mineral policy and guidance. The changes to the policy wording clarify the purpose of Policy BW10 and have no significant effect on the SA of the original policy. No further adverse effects are identified through the change. Deletion of the national designations of environmental and cultural importance from the mineral safeguarding areas illustrated on the proposals map is not deemed to have any significant adverse effect as Policy TB8 (see below) has been made more robust and specifically protects such areas from adverse impact. It is considered that no further SA is required.

#### ***Policy TB8: Minerals Proposals***

- 2.7 In response to matters raised by the Inspector at the LDP Hearing session held on 4<sup>th</sup> February 2010, the Council accepts that revisions are necessary to Policy TB8 in order to make it more robust. Removal of the word “normally” and the more positive restrictive wording of Policy TB8 have strengthened the policy as requested. As such there is an improvement on the performance of the policy against the SA Framework objectives, particularly in respect of landscape, biodiversity, transport and access objectives. It is considered that no further SA is required.



### **Policy AS19: Merthyr Tydfil Town Centre**

- 2.8 The Inspector requested that the boundary to the primary shopping frontage be justified and it has been amended to concur with the boundary in the Retail Study. Policy AS19 has been strengthened to protect the primary shopping area. The original policy performed well against the SA Framework objectives with no adverse effects identified. The additions to the policy clarify the proposals which will be permitted in the primary shopping area and will further protect the retail function of the town centre. Alterations to the illustrated town centre have been made to bring about compatibility with the area defined in the retail study. These changes will have no identified adverse impact on the continuing development of the retail and civic roles of the town centre.
- 2.9 Paragraph 4.19.10 has included support for residential development proposals in the town centre which will bring key architectural and historic buildings back into use. This will progress housing, culture and heritage and built environments SA objectives.
- 2.10 A new section (paras. 4.9.11) has been added to the justification and refers to the potential for a multi storey car park. Provision of car parking can encourage the use of the car rather than trips to the town centre being made by foot, bicycle or public transport. Alternatively, provision of car parking can assist the vitality and viability of town centres and in the long term reduce the number of car borne trips to other retail centres. However as there are currently no definitive plans for this development and as the overall balance of benefits and disbenefits is unclear, it is not considered that this suggestion presents the potential for a significant adverse or positive effect.
- 2.11 It is considered that the changes to Policy AS19 and the policy justification generally represent an improvement in the SA performance and no further SA is required.

### **Policy BW6: Townscape And Built Heritage**

- 2.12 The potential of the policy to progress SA objectives is improved by the revised wording clear statement that the "LDP will protect and enhance" and the removal of the phrase "unacceptable damage". Both these amendments strengthen the policy in terms of protecting the historic built environment.

### **Policy BW7: Sustainable Design And Place Making**

- 2.13 The policy now incorporates the word "sustainable" in the first paragraph which clarifies the intention of the policy. There is also clarity that contributions will be expected towards the provision of open space and outdoor play space, thereby improving the performance against health and



community objectives. Although the policy has been reworded and reordered the content and intent of the policy remains the same and it is not considered that further SA is required.

***Policy BW16: Protecting /Enhancing The Network Of Leisure Facilities***

- 2.14 The policy now states that the Council “will” protect leisure facilities rather than seeking to protect and this improves the performance of the policy. Equally the removal of the word “normally” strengthens the policy and the intention to protect leisure facilities. The policy justification now makes it clear that developers will be required to provide facilities in accordance with policies BW17 and AS17. The intention of the policy remains the same as the original but the amendments improve the performance of the policy against SA objectives, particularly those related to health, access and design. Therefore it is not considered that nay further SA is required.

***Policy BW17: Securing Community Infrastructure Benefits***

- 2.15 The policy now reflects the threshold of development at which planning obligation will be sought. Formerly this was only referred to in the reasoned justification. The threshold has also been reduced from 20 to 10 units which will have a beneficial effect on the provision of infrastructure. The inclusion of nature conservation progresses biodiversity objectives and further improves the policy. The intention of the policy remains unchanged and therefore there is no requirement for further SA.

***Policy BW18: Contaminated Land***

- 2.16 The amendments to the policy wording do not affect the intention of the policy and the deletion of the phrase “will normally require” improves the performance of the policy against the SA objectives for health. It is considered that no further SA is required.

***Policy AS6: Local Nature Conservation Designations***

- 2.17 The policy now makes it clear that planning conditions or agreements will be used to safeguard nature conservation interests and provide mitigation or compensatory measures where required. These changes strengthen the policy and better progress the biodiversity objectives of the LDP. Policy within the supporting text is removed as requested and is now embodied within the policy. It is considered that no further SA is required.

***Policy AS7: Waste Management Facilities – Locations Of Choice***

- 2.18 Although the policy and justification are presented as being deleted in their entirety, there are few differences between the original policy and justification the proposed replacement wording. Policy AS7 now includes a



final paragraph which imposes a requirement to illustrate why development for waste management facilities should be allowed outside the identified areas of search i.e. the existing B2 employment sites. This will progress landscape and land and soils objectives by ensuring that land already in industrial/employment use is used before greenfield sites. The policy justification now cross references to Policy TB10 in paragraph 4.7.6 and introduces management of green waste in paragraph 4.7.7. The amendments improve the performance of the policy against SA objectives and it is considered that no further SA is required.

***Policy AS9: Strategic Highway Improvement***

- 2.19 The minor amendment clarifies that the policy refers to only one strategic highway improvement. Paragraph 4.9.2 is amended to provide factual information on the strategic highway routes in the County Borough. These changes do not affect the original SA and no further SA is required.

***Policy AS12: Public Transport***

- 2.20 The wording of the policy is now more robust through the deletion of the word “normally” and replacement of “favoured” with “supported”. These amendments improve the progression of SA transport objectives and no further SA is considered necessary.

***Policy AS13: Life-Long Learning Facilities***

- 2.21 The amendments comprise minor alterations to the policy which do not alter the Intention or meaning of the policy or the justification. It is not considered that further SA is required.

***Policy AS16: New Leisure Developments***

- 2.22 The Inspector directed that reference to the Trago Mills (Swansea Road site) be deleted from the plan as an allocation. As the existing consent granted on the Swansea Road retail and leisure site has now been implemented, the site is a commitment rather than an allocation and as such is removed from the plan. The removal of reference to Swansea Road makes no difference to the outcome of implementation of the policy. Therefore it is considered that no further SA is required.

***Policy TB2: Unallocated sites within settlement boundaries***

- 2.23 The policy was deleted as a consequence of amendments to policy BW4 – Settlement Boundaries which now covers this issue. In terms of the sustainability of the LDP, which should be read and used as a whole, the deletion has no significant effect and no further SA is required.



**Policy TB3: Changes of use within settlement boundaries**

- 2.24 The proforma provides a table illustrating how proposals for changes of use can be assessed and managed by the use of other plan policies. In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect and no further SA is required.

**Policy TB5**

- 2.25 The policy removes reference to design, landscape, biodiversity and water environment interests in response to the request to remove duplication with other plan policies and as such this specific policy will not perform as well as the earlier version. However, In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect and no further SA is required.

**Policy TB10: Waste Management Sites**

- 2.26 Neither the revised Policy AS7 or this policy refer to character, landscape, water or nature conservations interests as in the deleted policy TB10. Therefore this specific policy does not perform as well against these specific interests. In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect due to other plan policies which will be material considerations when assessing planning applications for this type of development. Therefore it is considered that no further SA is required although reinstatement of the deleted criteria would improve the revised policy. This is particularly relevant in relation to the water environment which can be polluted by waste management activities.

**Policy TB11: Access, Parking And Accessibility Of Local Facilities**

- 2.27 The amendments update the policy to refer to the most recent guidance contained in the Manual for Streets. There are no significant changes to the content or intent of the policy and as such, it is considered that no further SA is required.

**Policy BW19: Affordable Housing Target**

- 2.28 Policy AS22 replaces the former Policy TB4 which was deleted as part of the focussed changes. The SA report on the Proposed Focussed Changes, (October 2009) found that although the affordable housing target figure was reduced in the new policy AS22, the figure reflected the number of units considered to be deliverable and still brought about benefits for housing and communities. This new revision to the affordable housing target increases the



target figure from that assessed in the October report and therefore the comments made above with reference to benefits for housing and communities are still relevant. No further SA work is required.

**Policy AS22: Affordable Housing Contributions**

- 2.29 Policy AS22 replaces the former Policy TB4 which was deleted as part of the focussed changes. These amendments now further update the policy and reflect deliverable targets in the current economic climate. Whilst reduced from earlier targets for percentage provision of affordable housing units, the policy will still bring forward the benefits identified in the SA of the earlier Policy TB4. Concern was always expressed that the 25% target could render developments unviable and therefore indirectly undermine the delivery of affordable housing. The recommendation in the Focussed Proposed Changes Report of October 2009, that the threshold number of units be incorporated in the policy has also been taken up. Therefore it is considered that there is no need for further SA.

**Policy TB13: Exception Sites for Affordable Housing**

- 2.30 As this is a new policy it has been subject to a detailed SA which can be found in Appendix 2 attached to this report. The SA found that beneficial effects are predicted for SA objectives relating to housing, health and communities with potential indirect benefits for employment objectives. Whilst potential for some adverse effects has been identified in relation to transport, landscape and biodiversity objectives, the anticipated level of development will be small and some mitigation will be possible. Therefore these effects are not considered to be significant and the overall impact to be neutral.

**Policy AS20: Retail allocations**

- 2.31 The changes to the plan are supported by evidence on the retail needs of the Borough. As the consent granted on the Swansea Road retail and leisure site has now been implemented, the site is a commitment rather than an allocation and as such is removed from the plan. The removal of reference to Swansea Road makes no difference to the outcome of implementation of the policy. Therefore it is considered that no further SA is required.

**New Paragraphs: Unstable Land**

- 2.32 The new paragraphs include direct reference to paragraphs 13.9.1 and 13.9.2 of Planning Policy Wales. This strengthens the section on unstable land in the LDP in terms of sustainability and as such no further SA is required.





## Appendix 1: Screening of Proposed Changes

(SA/SEA Screening commentary provided in right-hand column)

Deleted text in red, new text in green.

REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
<b>Policy BW14: Managing Employment Growth</b>				
Proforma 10	Policy BW14  Amendments to Appendices 3,5,& 7	<p>3.14 <b>Policy BW14: Managing Employment Growth.</b>  <b>During the plan period, 2006-2021,</b>  <del>30</del> <b>16.3 hectares of land is allocated to provide a suitable range of sites to accommodate the anticipated business and employment needs of the County Borough.</b></p> <p><u>Policy Justification</u></p> <p>3.14.1 The LDP's aspirations for growth are supported primarily by its housing strategy in conjunction with its employment <del>policies</del> strategy. <del>The Plan will seek to assist</del> Employment policy sets out to secure in the delivery of a strong and diverse economy; quality, well-paid jobs;</p>	The Council were requested to consider whether the allocated employment sites are realistic and deliverable and do they adequately reflect the requirements of the market?	The Council have carried out a thorough review of the employment land requirement for the County Borough and have adjusted the total of land allocated accordingly. The intent and purpose of the policy has not changed and an adequate supply of land is still proposed.  It is considered that no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>and help address problems of economic inactivity. The success of policy will depend on many factors, not least, future national economic trends, the success of indigenous small and medium enterprises and the level of inward investment that can be attracted to the area.</p> <p><b>Allocations</b></p> <p>3.1.4.2 One of the primary roles for the Plan is to ensure that there is a continuous, adequate supply of land to meet the future needs of business to provide the necessary employment opportunities. <del>Also, to ensure that there is a sufficiently diverse range of businesses in the area so that all local people have access to a variety of local jobs and do not need to travel too far to work. Ultimately, the intention is to achieve a situation whereby everyone is able to contribute to increasing prosperity on which improved standards of living depend. In order to accommodate the level of growth proposed by the</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>Plan, 30</del> this respect, 16.3 hectares of land has been allocated for employment <del>purposes</del> uses categorised as B1, B2 or B8 under the Town and Country Planning Use Classes Order 1987 (as amended) at locations identified in Policy AS14 and listed at Appendix 5. <del>Full</del> Details on how the employment land requirements were derived is contained in the <i>LDP Background Paper: Population, Dwelling and Employment Land Forecasts</i> (April 2007) and the <i>Merthyr Tydfil Employment Land Review</i> (July 2010) although a summary is also provided at Appendix 3 of this written statement. The <del>slight</del> over allocation of <del>2.0</del> 7.1 hectares compared to the Background Paper is to <del>make provision</del> provide a degree of flexibility and to make an allowance for land that could be given over to accommodate appropriate waste management facilities on B2 employment sites in accord with Policy AS7 and Appendix 7.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>3.1.4.3—Given the level of growth being proposed by the LDP, the allocation is considered realistic and reflects the findings of recent work undertaken for the South East Wales Economic Forum which compared land developed for employment purposes between 2000-2005, with development plan allocations and annual requirements.</del></p> <p><b>Using accessible, previously developed land</b></p> <p>3.1.4.3 Most new allocations continue to follow historical patterns whereby developments have concentrated at locations peripheral to the main Merthyr settlement and adjacent to the core highway network / strategic transport routes. The reasons for doing this are:-</p> <ul style="list-style-type: none"> <li>• <i>Accessibility</i>, in relation to the main transport corridors.</li> <li>• <i>Marketability</i>, related primarily to accessibility and potential links to customers and markets.</li> </ul>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<ul style="list-style-type: none"> <li>• Proximity of sites to complementary or sympathetic land uses including the larger centres of population / workforce.</li> <li>• Availability of suitable land for development.</li> <li>• Sustainability principles.</li> </ul> <p><del>3.14.6—Particular emphasis has been placed on using previously developed sites with 100 per cent of the total land allocated being regarded as brownfield. Identified locations are accessible by a variety of transport modes where it is considered that there will not be unacceptable impacts on people or the environment. In an effort to further diversify the type of business accommodation available, the Council will favour the construction of smaller scale units than has perhaps been the case in the past. The new Orbit Business Centre at</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Rhydycar has been set up with the intention of fostering new local and community based enterprise, thus contributing to overall levels of sustainability.</p> <p><b>High-tech and light industry</b></p> <p><del>3.14.7</del> Inward investment and international business often require highly attractive, readily available sites situated within a quality environment. In general, such business prefers locations along primary transportation corridors such as that provided by the M4. However, as the pressure to develop in these areas continues to increase, there remains a greater prospect of business being attracted to sites along secondary growth corridors such as those provided by the County Borough's strategic highway network.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>3.1.4.8 Two sites identified for employment purposes in the LDP (allocations E5 and E6) have therefore been reserved exclusively for high quality B1 uses. Both sites are ideally located alongside the strategic road system with access being achieved off existing roundabouts at Mountain Hare and Rhydyer respectively. Whilst the latter site is already available for development, the potential of the former site to accommodate a modern business development will only be realised following completion of the first phase of the ongoing land reclamation scheme at Ffos-y-Fran.</del></p> <p><b>Other employment opportunities</b></p> <p><del>3.1.4.4 Land allocations are made within the context that employment opportunities are now to be found in sectors and at locations far beyond traditional manufacturing and</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>business sites.</del> Aside from the allocated B-space sites, the Council acknowledges that the retail sector, commercial and entertainment sectors, service sector and tourism sector all play an important role in the composition and functioning of a modern <del>post industrial</del> society and this has been factored into the aforementioned employment requirement calculations. Merthyr Tydfil Town Centre particularly makes an invaluable contribution to the economic, social and cultural life of the County Borough, accounting for significant employment opportunities for local residents and accessible local services that are a focus for community activity. <del>The Council considers that a thriving town centre is therefore essential to the aim of building a strong and sustainable local economy.</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		Related strategic objectives: SO1; SO2; SO3; SO4; SO7 Complementary policies: BW13; AS7; AS14		
<b>Policy AS14: Employment allocations in the Primary Growth Area.</b>				
Proforma 10		<p><b>Policy AS14: Employment allocations in the Primary Growth Area.</b></p> <p><b>During the plan period, 2006 – 2021, land is allocated for employment purposes in the Primary Growth Area at the following locations as shown on the LDP Proposals Map:-</b></p> <ul style="list-style-type: none"> <li>• <del>E1</del> — Pengarnddu 1</li> <li>• <del>E2</del> — Pengarnddu 2</li> <li>• <del>E3</del> — Pant Industrial Estate</li> <li>• E4 — Goatmill Road</li> <li>• <del>E5</del> — Ffos-y-Fran</li> <li>• E6 — Rhydycar</li> <li>• <del>E7</del> — Dragon-parc</li> <li>• E8 — Car Park, Hoover</li> </ul>	<p>The Council were requested to consider whether the allocated employment sites are realistic and deliverable and do they adequately reflect the requirements of the market?</p>	<p>As noted above, the Council have carried out a thorough review of the employment land requirement for the County Borough and have adjusted the total of land allocated accordingly. Concurrently the Council have also carried out a review of their allocated sites for employment use and reassessed their deliverability.</p> <p>The changes to this policy reflect the review undertaken and proposes the deletion and</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p style="text-align: center;"><b>Factory</b> <u>Policy Justification</u></p> <p>4.14.1 The justification of the above policy is provided through the spatial priorities of the LDP together with the overall development strategy, which incorporates a requirement to effectively manage employment growth according to anticipated needs and the capacities available. Policy BW1 and BW14 are also relevant and reference to Appendix 5 is necessary for individual site details.</p> <p>Related strategic objectives: SO1; SO3; SO7; SO8.</p> <p><b>Complementary policies: BW1; BW7; BW14; BW18; AS7; TB11; AS24</b></p>		<p>inclusion of sites for reasons which are clearly set out in the Proforma. The purpose of the policy has not therefore changed and it is not considered that further SA is required.</p> <p>Changes to appendices 3,5 and 7 simply alter the data to reflect the policy changes above.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
<b>Policy AS24: Employment Site Protection</b>				
Proforma 10	New Policy AS24 and paragraphs 4.24.1 – 4.24.4	<p><b>Policy AS24: Employment site protection</b></p> <p><b>In order to protect the employment function of the County Borough's business and employment sites, development proposals will be restricted as follows:-</b></p> <p><b>At Rhydycar Business Park, development will only be permitted if:</b></p> <p><b>It falls within use class B1; or</b></p> <p><b>It provides an ancillary facility or service to the primary employment use.</b></p> <p><b>At Pengarnddu, Pant Industrial Estate, Goatmill Road, Willows/Dragon Park, Triangle Business Park and Merthyr Tydfil Industrial Park, development will only be permitted if:</b></p> <p><b>It is within use classes B1, B2 or B8; or</b></p>	The Council felt that the justification is self explanatory.	The detailed SA of this new policy can be found in Appendix 2. Beneficial effects are predicted for most SA objectives through the protection and retention of existing employment premises and the opportunity presented to achieve a wide range of employment opportunities within the Borough. No negative or adverse effects are identified.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>It is an appropriate Sui Generis use; or</b></p> <p><b>It provides an ancillary facility or service to the primary employment use, or</b></p> <p><b>It is an acceptable commercial service unrelated to class B uses.</b></p> <p>Policy justification</p> <p>4.24.1 The LDP recognises that today's jobs are provided by a wide range of different activities and that the economy of Merthyr is now more diverse and less reliant on employment opportunities within large business sites or estates. However, the LDP also considers it crucial that sufficient and suitable sites are retained for business purposes in order to continue offering an appropriate range of properties to the market, and to meet the ongoing regeneration objectives of the Plan. It is acknowledged that B1 uses particularly, can play a significant role in helping to foster innovation</p>		

REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>and enterprise.</p> <p>4.24.2 For these reasons, the above policy sets out to protect all business and employment sites identified on the LDP Proposals Map including existing / functioning sites, and sites proposed for development through LDP allocations. Ancillary land uses may be acceptable where those uses complement the broader employment activities and address the wider needs of people employed on those sites.</p> <p>4.24.3 Examples of appropriate Sui Generis uses include a builder's merchant; a freight contractor's yard; and a vehicle depot. Examples of commercial activities unrelated to use class B, which might be considered acceptable include indoor health, fitness and play facilities; day nurseries; and a commercial vehicle repair and maintenance facility.</p> <p>4.24.4 With the exception of the Rhydycar</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Business Park, which is B1 only, all business and employment sites identified in the LDP comprise uses that can be categorised as B1, B2 or B8 under the Town and Country Planning Use Classes Order 1987 (as amended). Under the waste management policies of the Plan, existing and proposed B2 sites are identified as areas of search for appropriate new waste management facilities.</p>		
<b>Buffer strips and Policy TB9: Buffer Zones</b>				
Proforma 31	Policy TB9: Buffer Zones Proposals MAp	<p>Deletion of buffer strips from the proposals maps.</p> <p style="text-align: center;"><b>Mineral buffer zones</b></p> <p><b>Policy TB9 Buffer Zones (200m for aggregates / 500m for coal) have been established between <del>permitted</del>, active and inactive mineral operations in the County Borough and other</b></p>	<p>In response to matters raised by the Inspector at the LDP hearing session on 4<sup>th</sup> February 2010, consideration has been given to the introduction of a policy for buffer strips and clarification of the role of buffer strips in relation to designations of national importance, the requirement for prior extraction and the issue of</p>	<p>The original SA found that Policy TB9 to be “a very specific policy which seeks to ensure that mineral resources are not sterilised through inappropriate development. The policy will have a positive impact with no identified adverse impacts.” The minor changes to the wording further improve the policy through the omission of</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>sensitive land uses. Within these zones, proposals for new development will normally only be allowed where:-</b></p> <ol style="list-style-type: none"> <li><b>1) They would not unacceptably affect operations within the mineral site.</b></li> <li><b>2) They would not be unacceptably affected by operations within the mineral site.</b></li> </ol> <p><del>5.9.4 All mineral resources advanced for safeguarding on the LDP proposals map have been determined with due cognisance to the mineral resource zones present within the County Borough. Where safeguarded mineral resources abut settlement boundaries, buffer strips (see Addendum LDP Background Paper: Minerals) have been imposed to identify the areas of land where future mineral extraction will not generally be acceptable.</del></p> <p>5.9.4 Mineral resources commonly abut the settlement boundary and any proposals to work such resources would be expected</p>	<p>flexibility as raised in MTAN2. However it was decided that the buffer strips are not necessary and that the current policy TB9 is sufficient.</p>	<p>the word "normally"</p> <p>Deletion of the buffer zones on the proposals map will not have a significant effect on the performance of the policy as the supporting text has now been altered to refer to MTAN2 and buffer zones are still clearly specified.</p> <p>It is considered that no further SA is required.</p>

REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		to maintain an appropriate separation distance from sensitive land uses. In respect of coal, the principle of coal working not generally being acceptable within 500 metres of settlements as set out in paragraph 29 of Minerals Technical Advice Note 2:Coal (2009) will be adhered to. Where exceptional circumstances are considered to exist, regard will also be had to paragraph 49-51 of Minerals Technical Advice Note 2:Coal (2009).		
<b>Policy BW10 and Safeguarding Areas</b>				
Proforma 32	Policy BW10 and paragraphs 3.10.1 – 3.10.11 Proposals Maps	<p><b>Deletion of policy and all original policy justification.</b></p> <p>Deletion of national designations of environmental and cultural importance from the mineral safeguarding areas illustrated on the proposals map.</p> <p><b>Policy BW10</b></p>	In response to matters raised by the Inspector at the LDP Hearing Session held on 4 <sup>th</sup> February 2010, the Council accepts that revisions are necessary to Policy BW10 and the Proposals Map. In respect of the former, the policy has been re-worded in order to make clear that its role is to safeguard minerals. The policy justification has	<p>The changes to the policy wording clarify the purpose of Policy BW10 and have no significant effect on the SA of the original policy. No further adverse effects are identified through the change.</p> <p>Deletion of the national designations of environmental and cultural importance from</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>The LDP contributes to meeting society's need for a continuous and secure supply of minerals by:</b></p> <ol style="list-style-type: none"> <li><b>1) Safeguarding mineral resources from permanent development which would sterilise them or hinder their extraction.</b></li> <li><b>2) Safeguarding mineral reserves from development which would prevent their extraction in order to maintain a minimum 10 year land bank of permitted aggregate reserves.</b></li> </ol> <p><u>Policy Justification</u></p> <p><b>Mineral Resources</b></p> <p>3.10.1 Since mineral resources are finite, it is necessary to ensure that resources, which could be of future economic importance, are safeguarded from other types of permanent development. In accordance with</p>	<p>also been revised to provide a clearer and more succinct explanation behind the safeguarding policy and proposals. Finally, to maintain consistency with national policy and aid the plan user, explicit cross reference is made to other related plan policies and national mineral policy and guidance.</p>	<p>the mineral safeguarding areas illustrated on the proposals map is not deemed to have any significant adverse effect as Policy TB8 (see below) has been made more robust and specifically protects such areas from adverse impact.</p> <p>It is considered that no further SA is required.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p data-bbox="763 448 1227 986">national minerals policy guidance and using evidence from an analysis of British Geological Survey resource maps and digital data, the LDP safeguards Primary and Secondary Coal resources and Limestone and Sandstone resources which lie outside settlement limits and do not contain National Designations of environmental and cultural importance. Cross reference to the LDP Constraints Map should also be made in order to identify all National Designations, particularly Scheduled Ancient Monuments.</p> <p data-bbox="674 1023 1227 1342">3.10.2 The act of safeguarding does not indicate an acceptance of future mineral working in these areas. All identified resources lie outside defined settlement limits where significant historic and environmental designations often exist and any proposal to extract the safeguarded mineral resource would</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>need to be fully considered through policy TB8.</p> <p>3.10.3 The need to consider pre-extraction where development is proposed on a mineral resource as set out in paragraph 13 of Mineral Planning Policy Wales (2000) and paragraph 42 of Minerals Technical Advice Note 2:Coal (2009) will also be applied.</p> <p><b>Mineral Reserves</b></p> <p>3.10.4 The <i>South Wales Regional Aggregates Working Party Regional Technical Statement (2008)</i> indicates that the region is largely self sufficient in aggregates at the present time. Based on recent shares of production between Merthyr Tydfil and Caerphilly, the statement concludes there is sufficient landbank in the two areas to last beyond the plan period. This takes into account the need to take alternative provision for aggregates currently being extracted in the</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Brecon Beacons National Park. As Merthyr Tydfil's landbank provides for more than 20 years of extraction, no new aggregate extraction sites are allocated in the LDP area.</p> <p>3.10.5 The two existing sources of aggregates in the LDP area are:-</p> <ul style="list-style-type: none"> <li>• Vaynor Quarry, which is the only active (though temporarily mothballed) limestone quarry and is located to the north of the main Merthyr settlement straddling the boundary with the Brecon Beacons National Park, and</li> <li>• Gelligaer Quarry, which is the only active sandstone quarry and is situated west of the County Borough near Gelligaer Common.</li> </ul> <p>The extent of the safeguarded permitted reserves at both quarries is shown on the LDP proposals map.</p> <p>3.10.6 The long-term inactive quarry at Morlais Castle has seen no mineral extraction since the early 1960s and</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>further extraction remains both extremely unlikely and undesirable for economic and environmental reasons respectively. As such, the quarry is not expected to contribute to meeting the future regional demand for aggregates and the Council will consider the drawing up of a prohibition order.</p> <p>3.10.7 Despite a long history of association with the mining industry, there is only one coal mining facility in operation within the LDP area. Nevertheless, this is of a significant scale and forms part of the 400 ha land reclamation scheme at Ffos-y-Fran which entails the extraction of approximately 11 million tonnes of coal by 2025. Two small underground mines also exist to the north of Bedlinog and though both have planning permission for the extraction of coal up to 2028, neither is currently operational or</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>licensed.</p> <p>With regard to the Proposals Map, all National Designations of environmental and cultural importance, including scheduled ancient monuments, have been removed from the mineral safeguarding areas. The updated Proposals Map reflects this change. An illustrative plan has also been prepared which shows cross boundary designations, including mineral safeguarding areas. The Plan does not currently include information from the Brecon Beacons National Park due to the current level of progress made on the preparation of their Local Development Plan. Notwithstanding this, the Authority has liaised with the National Park and an agreement has been reached to share this information when it is finalised and available.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
<b>Policy TB8 – Minerals Proposals</b>				
Proforma 34	Policy TB8	<p><b>Deletion of policy TB8 and all original policy justification.</b></p> <p><b>Policy TB8</b></p> <p><b>Proposals for mineral extraction and associated development will only be allowed where:-</b></p> <ol style="list-style-type: none"> <li><b>1. They would not result in unacceptable environmental impacts.</b></li> <li><b>2. They would not result in an unacceptable impact on the health and amenity of neighbouring land uses including the effects of dust, noise, vibration and traffic.</b></li> <li><b>3. They are acceptable in terms of geological, hydrological and hydrogeological factors.</b></li> </ol>	<p>In response to matters raised by the Inspector at the LDP Hearing session held on 4<sup>th</sup> February 2010, the Council accepts that revisions are necessary to Policy TB8 in order to make it more robust. The following revised policy is considered to be more precise with a number of the original ambiguous words and phrases removed. Certain policy issues explicitly referred to, such as landscape quality and nature conservation, have been removed as these fall under environmental impacts and can also be addressed through Policy BW5. Reference to 'site and wider safety' has also been removed as this is not a planning consideration.</p>	<p>Removal of the word "normally" and the more positive restrictive wording of Policy TB8 have strengthened the policy as requested. As such there is an improvement on the performance of the policy against the SA Framework objectives, particularly in respect of landscape, biodiversity, transport and access objectives.</p> <p>It is considered that no further SA is required.</p>

REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>4. They would not conflict with transportation considerations including access, parking, traffic generation, and enjoyment of public rights of way.</p> <p>5. They would not have an unacceptable impact on land stability</p> <p>6. They include acceptable proposals for progressive and final restoration, aftercare and beneficial after-use.</p> <p>7. They maximise opportunities to re-use and recycle mineral waste.</p> <p>The production and use of alternative and recycled materials will be supported as substitutes for naturally occurring aggregates.</p> <p>Complementary policies: BW4, BW5,</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>BW6, BW12, BW16 and BW18</p> <p><u>Policy Justification</u></p> <p>5.8.1 Mineral extraction can have significant consequences for the environment and the health and amenity of local communities. The need for a particular mineral must therefore be weighed against the impact of its extraction and associated operations. Account will be taken of the extent to which amenity and environmental impacts can be mitigated and of any positive benefits that can be achieved.</p> <p>5.8.2 Whilst individual characteristics of mineral working may vary, there are many common factors that need to be considered in assessing proposals. The above policy is applicable to new or extended mineral workings and associated</p>		



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		<p>development, including aggregate recycling facilities; review of existing operations; and coal bed methane extraction.</p> <p><b>Coal</b></p> <p>5.8.3 The demand for coal is difficult to predict and unexpected proposals for coal extraction may come forward over the plan period. Such proposals will need to be carefully considered against environmental and amenity issues, taking into account the cumulative impacts of similar schemes in the area, be they existing or proposed.</p> <p>5.8.4 Policy TB8 should be read in conjunction with national minerals policy particularly with regard to the need for Environmental Impact Assessments and Health Impact Assessments. The requirements of paragraph 62 of Minerals Planning</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Policy Wales (2000) will be considered alongside Policy TB8 and where coal working is not environmentally acceptable a Social Impact Assessment will need to be prepared to enable an assessment of the benefits and disbenefits to the community. Community benefits will be considered in line with the examples identified in paragraph 46 of Minerals Technical Advice Note 2: Coal (2009).</p> <p><b>Aggregates</b></p> <p>5.8.5 The Council is satisfied that with the continued working at current production levels, the existing quarries in the County Borough will continue to meet Merthyr's proportional level of contribution to the estimated regional need for aggregate minerals. As the aggregates landbank provides for more than 20 years of extraction, further extensions to existing sites or</p>		



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		new extraction sites are only likely to be justified in rare and exceptional circumstances.		
<b>Policy AS19: Merthyr Tydfil Town Centre</b>				
Proforma 16	Policy AS19 and paragraphs 4.19.1 – 4.19.13  Redrawing of the primary shopping area on the proposals map to accord with changed wording of Policy AS19.  Paragraph 2.5.16	Amendments to Policy AS19 and the proposals map.  <b>The Town Centre boundary is defined as shown on the LDP Proposals Map. Development proposals will be favoured where they maintain or enhance the retail, business, leisure, tourism, entertainment, arts and cultural functions of the centre particularly with regard to improving its viability and attractiveness.</b>  <b>In order to protect the vitality and viability of the Primary Shopping Area, proposals for changes of use to ground floors of class A1 retail premises will only be permitted</b>	The Inspector requested that the boundary to the primary shopping frontage be justified and it has been amended to concur with the boundary in the Retail Study.  Policy AS19 has been strengthened to protect the primary shopping area.	The original policy performed well against the SA Framework objectives with no adverse effects identified. The additions to the policy clarify the proposals which will be permitted in the primary shopping area and will further protect the retail function of the town centre. Alterations to the illustrated town centre have been made to bring about compatibility with the area defined in the retail study. These changes will have no identified adverse impact on



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		<p><b>where:-</b></p> <ul style="list-style-type: none"> <li>• <b>The proposal is for class A2 or class A3 retail use.</b></li> <li>• <b>The proposal does not lie adjacent to a non-A1 retail unit.</b></li> <li>• <b>The proportion of A1 retail units will not fall below 85 per cent of the total number of commercial premises in the Primary Shopping Area.</b></li> </ul> <p><b>Policy Justification</b></p> <p><del>4.19.1—The Council recognises the contribution made by Merthyr Tydfil Town Centre to the ongoing regeneration of the County Borough. Consequently, the LDP seeks to maintain a strong, attractive and dynamic town centre that is highly accessible and offers a good degree of choice and quality services and facilities. The plan acknowledges that the town centre has the physical capacity for further growth and a proven development potential but importantly, it also benefits from willingness for positive change through</del></p>		<p>the continuing development of the retail and civic roles of the town centre.</p> <p>Paragraph 4.19.10 has included support for residential development proposals in the town centre which will bring key architectural and historic buildings back into use. This will progress housing, culture and heritage and built environments SA objectives.</p> <p>A new section (para. 4.9.11) has been added to the justification and refers to the potential for a multi storey car park. Provision of car parking can encourage the use of the car rather than trips to the town centre being made by foot, bicycle or public transport. Alternatively, provision of car parking can assist the vitality</p>



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		<p><del>partnership.</del></p> <p>4.19.1 The Council recognises the significant contribution made by Merthyr Tydfil Town Centre to the ongoing regeneration of the County Borough. Since 2005, over £9m of new investment has taken place as part of town centre regeneration initiatives including award-winning public realm improvements; enhancements to the central river corridor; improvements to the town's principal gateways and approaches; and improved signage coupled with better links to local heritage and amenities. Significant capital infrastructure improvements have been complemented by revenue investment, which together have resulted in an overall increase in the amount of retail floorspace present, an increase in the number of retail outlets available, and an increase in visitor numbers / town centre footfall.</p> <p><del>4.19.2 The above characteristics combined with past development patterns and more recent regeneration initiatives have led numerous independent studies and</del></p>		<p>and viability of town centres and in the long term reduce the number of car borne trips to other retail centres. However as there are currently no definitive plans for this development and as the overall balance of benefits and disbenefits is unclear, it is not considered that this suggestion presents the potential for a significant adverse or positive effect.</p> <p>It is considered that the changes to Policy AS19 and the policy justification generally represent an improvement in the SA performance and no further SA is required.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>strategies to conclude that new investment should continue to concentrate on the town centre. Particularly, the town centre should:</del></p> <p>4.19.2 The LDP seeks to maintain a strong, attractive and dynamic town centre that is highly accessible and offers a good degree of choice and quality services and facilities. The plan acknowledges the town centre has a proven development potential and a capacity for further growth, but importantly, that it also benefits from willingness for positive change through a well established Town Centre Partnership and Chamber of Trade. Consequently, the town centre should:</p> <ul style="list-style-type: none"> <li>• be a major attraction in retaining population and encouraging new people to move into the County Borough</li> <li>• offer a full range of shops and services thus encouraging multiple trips and minimising car dependency</li> <li>• be the catalyst for encouraging the birth and growth of small business</li> </ul>		



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		<ul style="list-style-type: none"> <li>• be used to capitalise on Merthyr's associations with the past</li> <li>• see the re-use of empty space and vacant properties (particularly key buildings) and seek to benefit from the recent refurbishment of its environs.</li> </ul> <p><b>Retail uses</b></p> <p>4.19.3 The town centre is one of the main shopping destinations in the Capital Network Zone of south east Wales. Ranking alongside Bridgend, Merthyr Tydfil is secondary only to the national centres of Cardiff, Swansea and Newport in the shopping floorspace hierarchy.</p> <p>4.19.4 In accord with the continuing momentum towards establishing more sustainable shopping patterns, the LDP seeks to ensure that the town centre remains the preferred shopping destination for the people of the County Borough. The Plan is facilitating further opportunities for new retail development within the town centre boundary (see Policy AS20) and envisages</p>		



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		<p>the <del>expansion</del> continued improvement of services and facilities so that only periodic trips remain necessary to <del>one of the national</del> retail centres elsewhere.</p> <p>4.19.5 Whilst the town centre is for the most part trading successfully, the Council considers that further new development and environmental improvements must occur if the potential to attract further expenditure is to be realised. In the longer term, larger scale redevelopment must take place if the centre's position in the retail hierarchy of south-east Wales is to be maintained. Particularly, the <i>Retail &amp; Commercial Leisure Capacity Study</i> has identified that St. Tydfil's Square Shopping Centre is in need of redevelopment, not only to improve its physical attractiveness, but also to allow for an intensification of uses and the construction of modern, larger footprint stores. <del>Overall, the town centre must retain a greater proportion of residents' expenditure in order to reinforce</del></p>		



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		<p><del>its status as a regional shopping destination.</del></p> <p><b>Protecting the retail function of the Primary Shopping Area</b></p> <p>4.19.6 The primary shopping area is defined as those frontages on both sides of High Street between <del>Church Street</del> John Street in the north and Swan Street in the south together with <del>these</del> properties in <del>Glebeland Street, John Street,</del> Victoria Street, Market Square, <del>Beacons Place,</del> and the St. Tydfil's Square Shopping Centre. The area, which is shown on the LDP proposals map, is largely pedestrianised with most of the major multiple retailers being located here.</p> <p>4.19.7 The vitality of primary shopping areas can sometimes be compromised by the proliferation of non-primary retail uses such as food and drink outlets, offices, professional services and amusement arcades. It is considered that the present mix of uses in Merthyr's primary shopping area is finely balanced and that loss of retail uses over the plan period could lead to a detrimental effect on the area's main retail function. Whilst it is acknowledged that</p>		



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		<p>certain non-primary uses can generate pedestrian movement in their own right and may contribute to an area's vitality and viability (particularly outside usual shop opening times), frontages with little or no display can often detract from the shopping environment.</p> <p>4.19.8 Whilst the LDP does not seek to prevent changes of use taking place, it does seek to ensure that the cumulative effect of such proposals is not to disperse retail activities nor erode the overall character and function of the primary shopping area. <del>An appropriate criterion has therefore been incorporated within Policy TB3.</del></p> <p><b>Other uses</b></p> <p>4.19.9 The Council acknowledges the town centre's role in the economic and social life of the community and is committed to enhancing its diversity of activity. In addition to its retail function, the town centre, together with the adjacent Rhydycar leisure site, will be promoted as the principal focus for commercial leisure and entertainment pastimes across the</p>		



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		<p>County Borough and beyond.</p> <p>4.19.10 The LDP recognises the centre's regional role together with the scope that exists to reinforce this role by developing evening cultural pursuits and creating additional arts, tourism, leisure and entertainment employment in line with the sequential approach. Utilising vacant and under-used town centre space and premises is seen as fundamental to this approach and should pay particular regard to those buildings of key architectural and historic importance whose poor condition detracts from the street scene and the general attractiveness of the centre. Though their future improvement lies beyond the direct influence of the LDP, the plan will, wherever possible, support appropriate development proposals, including residential, to bring these properties back into beneficial use.</p> <p><del>4.19.11 Development proposals incorporating a mixture of uses are considered one of the most effective ways of ensuring diversity of activity. A combination of uses, including residential, can promote increased viability for the</del></p>		



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		<p><del>development itself and can help deliver increased vitality for the area concerned.</del></p> <p><b>Car Parking</b></p> <p>4.19.11 LDP policy sets out to secure easy access to all the town centre's services and facilities by the most sustainable means. This entails the promotion of an energy-efficient land use / transportation strategy which includes an accessible public transport network, but also means providing adequate public parking where there remains no realistic alternative to the use of the private car.</p> <p>4.19.12 It is acknowledged that opportunities for town centre parking at certain times of the day are sometimes insufficient to readily cater for demand and that there is a need for provision to be improved. The LDP recognises there is potential to develop a new multi-story car park within the town centre boundary, particularly, on the site of the existing Castle</p>		



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		<p>Car Park. Such development would provide opportunities to concentrate parking in a modern, secure environment whilst reducing the number of vehicles driving around the town centre searching for a space in surface-level car parks.</p> <p>4.19.13 Whilst there are currently no definitive plans to provide a multi-storey car park, it is envisaged that new parking provision will come forward as an integral part of wider town centre redevelopment over the longer term, allied to other uses.</p> <p>In light of the proposed change to the above policy, criterion 11 of Policy TB3 should also be changed so that it relates to the County Borough's local shopping centres. It is not considered that the principles associated with protecting the Primary Shopping Area should be applied to the local retail centres as certain uses (e.g. food and drink establishments) often contribute to the viability and the vitality of those centres. However, the Council is</p>		



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		<p>aware of the importance of maintaining healthy local centres as an integral part of the defined hierarchy and will resist changes of use that would fail to maintain or enhance the vitality of the centres concerned. More information on this change is included within Proforma 25.</p> <p><b>Related Task</b> <i>Clarify Para. 2.5.16</i></p> <p>Policy TB3 is proposed for deletion from the LDP under Proforma 25. However, the following changes are proposed to Para 2.5.16 to ensure consistency within the remainder of the Plan:-</p> <p>2.5.16 The centre of Treharris, <del>retains the characteristics of a district level shopping centre and</del> along with the other local shopping centres identified in the Plan, has an important role to play in helping to maintain the vitality of the wider community. Through policies such as BW15 and AS18, the LDP aims to assist in revitalising the centre</p>		



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		<p>Treharris by <del>focusing efforts on improving the viability of retail and commercial uses and encouraging a greater diversity of uses within the centre. In turn, policies will aim to prevent the loss of existing shops and business premises and facilitate the use of redundant buildings for alternative uses including service, entertainment, cultural, or residential purposes</del> protecting the services and community facilities that already exist, facilitating appropriate improvements and enhancements, and safeguarding the centre's retail function as part of a clearly defined retail hierarchy.</p>		
<b>Policy BW6: Townscape And Built Heritage</b>				
Proforma 25	Policy BW6 and paragraphs 3.6.1 to 3.6.2	<p><b>POLICY BW6: TOWNSCAPE AND BUILT HERITAGE</b></p> <p><b>The LDP will protect and enhance the unique built heritage of the County Borough. <del>Will be safeguarded and,</del></b></p>	The Council were requested to remove duplication with other policies and remove any ambiguity in the wording.	The potential of the policy to progress SA objectives is improved by the clear statement that the "LDP will protect and enhance" and the removal of the phrase



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		<p><del>wherever possible, enhanced.</del> Development proposals will only be permitted where <del>their use, siting and design will not have an unacceptable impact on</del> it can be demonstrated they would preserve or enhance the architectural quality, character and setting of any of the following:</p> <ul style="list-style-type: none"> <li>• Listed Buildings;</li> <li>• Scheduled Ancient Monuments; <del>and their setting</del></li> <li>• Conservation Areas;</li> <li>• Registered Historic Parks and Gardens <del>and their setting</del> of Special Historic Interest;</li> <li>• Townscape character, and the local distinctiveness <del>and setting</del> of settlements.</li> <li>• Other historic, <del>archaeological</del> and cultural features of acknowledged importance.</li> </ul> <p>3.6.1 <u>Policy Justification</u> The historic growth of Merthyr Tydfil as a consequence of early industrial activity, particularly in</p>		<p>“unacceptable damage”. Both these amendments strengthen the policy in terms of protecting the historic built environment.</p>



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		<p>coal mining and iron making, has dictated the urban form and character in evidence today. <del>The townscape still reflects the industrial past particularly that of the 19<sup>th</sup> Century when the main Merthyr settlement grew to the height of its industrial prominence. Much of the town's heritage is a direct result of this revolutionary period in history and, though many historic buildings and features were lost in the drive to alleviate the ecutely poor living conditions that ensued, what remains is an irreplaceable resource that provides a unique insight to the past. The individual valley communities also have their own distinct architectural characteristics arising from a history allied to coal mining.</del> Whilst it is essential that, in future, the County Borough is allowed to adapt and</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>prosper, it is also necessary that this should not be done at the expense of its rich architectural heritage. The LDP therefore considers the historic built environment as a precious resource that can be harnessed in a sustainable manner for the purposes of regeneration and integrated with new development as part of a vibrant local economy.</p> <p>3.6.2 The above policy, in conjunction with the relevant area-specific policies contained in Chapter 4, seeks to <del>conserve</del> preserve and enhance the best elements of the built environment not only for the variety it offers in terms of its townscape and architectural character, but for its contribution to defining the distinctive physical characteristics of the area in combination with its landscape and biodiversity. In formulating Policy BW6, full account has been</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>taken of the draft <i>Merthyr Tydfil Heritage Strategy (2008)</i> and in implementing the policy's provisions, regard will be given to the fact that towns and villages must function fully as places for social and economic activity to be truly successful.</p> <p><del>3.6.3</del> The distribution of existing townscape and built heritage designations such as Listed Buildings, Scheduled Ancient Monuments and Conservation Areas is illustrated on the LDP Constraints Map. A corresponding list of heritage features is included at Appendix 2. <del>Policy AS4 on the Historic Landscape is also relevant.</del></p> <p>Related strategic objectives: SO11 Complementary policies: BW5; AS4</p>		
<b>Policy BW7: Sustainable Design And Place Making</b>				



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
Proforma 25	Policy BW7 and paragraphs	<p><b>Policy BW7: Sustainable design and place making</b></p> <p><del>The design of new development must be of good quality and should:</del></p> <p><b>The Council will support good quality sustainable design and require new developments to:</b></p> <ul style="list-style-type: none"> <li>• <b>Be appropriate to its local context in terms of scale, height, massing, elevational treatment, materials and detailing, layout form, mix and density.</b></li> <li>• <b>Integrate effectively with adjacent spaces and the public realm to enhance the general street scene and create good quality townscape.</b></li> <li>• <b>Not result in unacceptable impact on local amenity in terms of visual impact, loss of light or privacy, disturbance and traffic movements</b></li> <li>• <b>Incorporate a good standard of landscape design</b></li> </ul>	The Council were requested to remove duplication with other policies and remove any ambiguity in the wording.	<p>The policy now incorporates the word “sustainable” in the first paragraph which clarifies the intention of the policy. There is also clarity that contributions will be expected towards the provision of open space and outdoor play space, thereby improving the performance against health and community objectives.</p> <p>Although the policy has been reworded and reordered the content and intent of the policy remains the same and it is not considered that further SA is required.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<ul style="list-style-type: none"> <li>• Sensitively relate to existing settlement patterns and take account of natural heritage and the historic environment on-site and in terms of potential impact on neighbouring areas of importance.</li> <li>• Foster 'inclusive design' by ensuring the development allows access for the widest range of people possible</li> <li>• Contribute <del>where appropriate,</del> to the provision of usable <b>open and</b> outdoor play space, ensuring its accessibility and connectivity to other green infrastructure, footpaths and cycleways</li> <li>• <del>Contribute to national and local energy efficiency targets through the promotion of energy and resource efficient / adaptable buildings and layouts using sustainable design / construction techniques and materials</del></li> <li>• <b>Incorporate resource efficient / adaptable buildings and</b></li> </ul>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>layouts using sustainable design and construction techniques, including the re-use and recycling of construction and demolition waste on site, and energy and water conservation / efficiency measures</p> <ul style="list-style-type: none"> <li>• Minimise the demand for energy and utilise the renewable energy resource through appropriate layout, orientation, mix of uses, density of development, landscaping, optimal use of local topography and incorporation of renewable energy technologies</li> <li>• Incorporate facilities for the segregation, recovery and recycling of waste</li> <li>• Provide a safe environment by addressing issues of security, crime prevention, and the fear of crime in the design of buildings and the space and routes around them</li> </ul> <p><del>• Have regard to the desirability</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>of preserving the setting of any listed building</del></p> <ul style="list-style-type: none"> <li><del>• Encourage sustainable waste management techniques such as the re-use and recycling of construction and demolition waste and the incorporation of provision for segregation, recovery and recycling of waste</del></li> <li><del>• Minimise water use, promote water conservation and provide for water efficiency including opportunities for water recycling.</del></li> </ul> <p>3.7.1 <u>Policy Justification</u> Sustainability is closely linked to stewardship and responsibility in the use and management of resources. The LDP reflects this principle through the general thrust of its policies and in its focus on regeneration, which also recognises that new development is necessary to adapt Merthyr</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Tydfil to meet its changing needs and secure its continued wellbeing. <del>Whilst new development is encouraged in areas where it is beneficial, it is important to ensure that such development employs design that has regard to the environmental context in which it is located; helps promote public safety; helps promote inclusiveness; and is energy and resource efficient.</del> The above policy, which has been formulated with regard to <i>Planning Policy Wales (2010)</i> and <i>TAN 12: Design (2002)</i>, <del>and MIPPS 01/2008: Planning for Good Design.</del> It sets out the fundamental considerations that are necessary to achieve good quality design in all forms of built development, and <del>to</del> will ensure that the best elements of the existing built form continue to be integrated with</p>		



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		<p>quality new development as part of a vibrant local economy. <del>The Council will issue supplementary planning guidance to amplify the themes of the above policy after the LDP's adoption. However, design guidance on certain householder developments, developments in conservation areas, and shop fronts is already available.</del></p> <p><del>3.7.2 Buildings and the spaces around them contribute greatly to the individual character of our towns and villages. The topography, setting and historical influences of an area are often expressed in the design of its buildings. The Council would not normally wish to prescribe the design of new buildings but, it is concerned, that where new development or alterations to existing buildings take place, the design should be sympathetic and of a good standard.</del></p>		



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		<p>3.7.2 The Council welcomes discussions with prospective developers or their agents early on in the planning process. Specific information, for example, plans; elevations; perspectives; photographs; and written material such as design and access statements may often be required to clarify intentions and consider a proposal's relationship to the wider area. <del>The latter</del> Early discussions also allow developers to demonstrate the extent to which their proposals meet the sustainability and environmental performance criteria set out in the <i>Code for Sustainable Homes (2008)</i> and /or the <i>Building Research Establishment Environmental Assessment Method (BREEAM)</i> standards, against which, the Council affords due regard.</p> <p>3.7.3 Reducing energy demand, energy efficiency and the</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>generation of energy from renewable sources in new developments is a key element of the LDP strategy that aims to make a valid contribution to achieving carbon neutral development and combating the effects of climate change. The Renewable Energy Capacity Study (2008) undertaken as part of the LDP process identifies renewable energy opportunities <del>i.e. solar thermal / solar photovoltaic; biomass; combined heat and power (CHP); and ground sourced heat pumps (GSHP) and the extent of their</del> potential for different technologies to be <del>realised</del> used across the County Borough. <del>In setting out to maximise that potential, specific renewable energy technologies have been identified as potentially feasible technologies for some of the LDP's key strategic allocations.</del> Feasibility studies for low and zero carbon technologies will be assessed in part against the</p>		



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		<p>findings of the <del>aforementioned</del> Capacity Study.</p> <p>3.7.4 <del>Due to locational variations and the fact that the market potential for power generation using technology that harnesses local resources needs to be explored further, making site specific recommendations on other site allocations has not proved possible. Instead,</del> Developers will be required to investigate <del>these issues</del> power generation using technology that harnesses local resources as part of the Design and Access Statement submitted with individual planning applications. Technologies and measures that might be incorporated into building design to achieve sustainable buildings include biomass heating; biomass combined heat and power; green roofs /biodiversity roofs; ground sourced heat pumps; external and internal insulation; solar water heating; solar photovoltaics; passive solar design; rainwater</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>recycling; and, micro-wind turbines.</p> <p>Related strategic objectives: SO5; SO8; SO9; SO10; SO11; SO12</p> <p>Complementary policies: BW4; BW5; BW6; BW8; BW11; BW12; BW15; BW16; BW17; AS1; AS2; AS3; AS4; AS5; AS6; AS7; AS8; AS12; AS13; AS14; AS15; AS16; AS17; AS19; AS20; AS21; AS23; TB5; TB6; TB7; TB8; TB10; TB11;TB13</p>		
<b>Policy BW16: Protecting /Enhancing The Network Of Leisure Facilities</b>				
Proforma 25	Policy BW16 and paragraphs 3.16.1 to 3.16.6	<p><b>Policy BW16: Protecting /enhancing the network of leisure facilities</b></p> <p><b>The Council will <del>seek to</del> protect and enhance the County Borough's network of leisure facilities including outdoor play space, public open space and public rights of way in order to ensure their continued use for recreation and amenity. Development proposals that result in the loss of an existing facility will not <del>normally</del> be permitted unless:-</b></p>	The Council were requested to remove any ambiguity in the wording and update references in supporting text.	The policy now states that the Council "will" protect leisure facilities rather than seeking to protect and this improves the performance of the policy. Equally the removal of the word "normally" strengthens the policy and the intention to protect leisure facilities. The policy justification now makes it clear that developers <b>will</b> be



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<ul style="list-style-type: none"> <li>• <b>Alternative provision of at least equivalent value to the local community can be provided nearby, or</b></li> <li>• <b>It can be demonstrated that existing provision is inappropriate or surplus to the needs of the community and is no longer required, or</b></li> <li>• <b>In the case of commercially based leisure facilities, it can be demonstrated there is no longer a viable leisure use for the facility.</b></li> </ul> <p><u>Policy Justification</u></p> <p>3.16.1 <i>The Health, Social Care and Wellbeing Strategy (2008)</i> recognises the importance of regular exercise as part of everyday activity and the valuable benefits that are likely to arise. Ready access to leisure facilities is therefore considered essential, and the Council recognises the importance of</p>		<p>required to provide facilities in accordance with policies BW17 and AS17.</p> <p>The intention of the policy remains the same as the original but the amendments improve the performance of the policy against SA objectives, particularly those related to health, access and design.</p> <p>Therefore it is not considered that any further SA is required.</p>

REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>balancing the provision of leisure facilities to ensure that the widest range of local needs is met.</p> <p><del>Raising levels of fitness, tackling widespread problems of obesity and reducing the likelihood of ill-health remain priorities for the Council alongside the need to improve education and awareness of health related issues.</del></p> <p><del>3.16.2 Leisure opportunities can also be a social resource for those less advantaged in society with low cost or free access to sporting activities considered to be a possible means of helping reduce rates of crime and vandalism. Leisure activities may also bring welfare benefits to the elderly and special needs groups by increasing their mobility and reducing potential for social exclusion.</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>3.16.3 Whilst it is intended to provide as many facilities within the County Borough as possible, it is also recognised that because of the physical and demographic characteristics of the area, a minority of activities will continue to be catered for in other areas of the Capital Network Zone, principally Cardiff. Traditionally, this has occurred where commercially based leisure operations are involved although it is anticipated this trend will gradually cease over the Plan period as the prospect of new leisure developments at Rhydycar and Swansea Road come to fruition (see Policy AS16) and the County Borough capitalises on its status as the primary key settlement within the Heads of the Valleys area.</del></p> <p>COMMERCIAL LEISURE</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>3.16.2 Most existing commercially-based leisure uses are located in and around the town centre and include a cinema, <del>ten pin bowling alley</del>, bingo halls, a gymnasium /fitness centre, hotels, restaurants, public houses and nightclubs. Such uses bring advantages to the town centre not only in leisure/ recreation terms but also through the economic benefits they deliver. For this reason, they will continue to be favoured as a means of increasing town centre vitality and viability (see Policy <del>AS16 and</del> AS19).</p> <p><i>FORMAL LEISURE</i></p> <p>3.16.3 Formal leisure and recreational facilities are provided by a range of agencies although the majority of facilities are owned and operated by the Council (see Appendix 6). Facilities, which often vary in quality, are distributed</p>		



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		<p>widely throughout the County Borough and range from basic sports pitches and playgrounds to more diverse establishments such as sports halls and community/leisure centres. <del>One of the deficiencies identified in the existing provision of public sector leisure facilities is that they operate at varying degrees of quality and effectiveness owing to the dissipation of limited resources across many sites. The Council will therefore continue to seek to target resources more effectively and will, for instance, pursue partnership working with the private and voluntary sector (including community groups and local organisations) in order to help broaden the quality and range of facilities available. The Council</del> Where new residential development places an added</p>		



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		<p>burden on Council maintained facilities, the LDP will <del>also seek leisure</del> require improvements to be delivered through the implementation of Policies BW17 and AS17. These policies <del>which aim</del> are designed to secure community infrastructure benefits that will help alleviate additional demands arising from those <del>through the</del> new housing developments identified at Appendix 4.</p> <p><b>Informal leisure</b></p> <p>3.16.4 Aside from the land and facilities used for commercial and formal leisure pursuits, there are many other areas in the County Borough <del>both within and outside the settlement limits</del> that are regularly used for more informal types of recreational activity. As <del>draft</del> TAN 16: Sport, Recreation and Open Space (2009) confirms, <del>these</del> such areas may be of at least equal</p>		



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		<p>value to the community and may also have additional visual amenity and /or conservation importance. <del>Indeed, the County Borough's woodlands, parks, greenspaces, rivers and other water features are often some of its greatest assets and the Council recognises that the more attractive they become, the more people are likely to use them.</del></p> <p>3.16.5 Large tracts of open space between and within Merthyr Tydfil's urban areas are recognised as possessing significant leisure and amenity importance. The most expansive of these are highlighted on the LDP proposals map on the basis of their perceived recreational value in accord with the Council's 'Coed Merthyr' recreational, access and landscape strategy. <del>However, there are a</del></p>		



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		<p><del>considerable number of smaller sites throughout the County Borough, which it is not possible to show on the LDP Proposals map, but which have a similar or complementary value. Many of these sites are listed at Appendix 6 for completeness, although, the list is not intended to be exhaustive.</del> However, there are a considerable number of smaller sites throughout the County Borough which have a similar or complementary value, but which it is not possible to show on the LDP Proposals map for reasons of clarity. All Council owned / maintained sites are listed at Appendix 6, and whilst the list is considered comprehensive, it is not completely exhaustive of the situation in Merthyr Tydfil owing to the fact that there are also privately owned sites, which may</p>		



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		<p style="color: green;">serve a similar function, but for which reliable data is not currently available.</p> <p>3.16.6 In addition, the County Borough has an extensive rights of way network centred around the strategic routes of the Taff Trail, Celtic Trail, Trevithick Trail, Abermorlais Trail, Taff Bargoed Trail and Heads of the Valleys Cycle Route (all shown on the LDP Proposals Map). This network will be developed further during the LDP period and integrated with the ongoing preparation of a definitive rights of way map for the County Borough so that safe access to physical recreation opportunities is made available to all and overall standards of health and wellbeing improve.</p> <p style="color: red;"><del>3.16.7 The above policy is designed to ensure that, in all cases, leisure</del></p>		



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		<p><del>sites and facilities are not given over to development or inappropriate redevelopment and that their value as a resource for leisure, recreation and amenity is protected and enhanced unless strict criteria can be met. LDP Policies AS17 and TB3 are also relevant in this regard.</del></p> <p>Related strategic objectives: SO8; SO9</p> <p>Complementary policies: BW17; AS16; AS17; AS19</p>		
<b>Policy BW17: Securing Community Infrastructure Benefits</b>				
Proforma 25	Policy BW17 and Paragraphs 3.17.1 to 3.17.6	<p><b>Policy BW17: Securing Community Infrastructure Benefits</b></p> <p><b>Development proposals will only be permitted where adequate community</b></p>	The Council were requested to rationalise the supporting text.	The policy now reflects the threshold of development at which planning obligation will be sought. Formerly this was only referred to in the reasoned



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		<p>infrastructure capacity exists or where additional capacity is capable of being provided as part of the development without unacceptable impacts on people or the environment. In order to address the impacts of particular developments, the Council will seek to secure community infrastructure benefits through planning obligations on developments of 10 units or more. Such obligations may relate to:</p> <ul style="list-style-type: none"> <li>• Affordable housing</li> <li>• Suitably designed and located public open space and play, recreation, sport and leisure facilities</li> <li>• Education provision</li> <li>• Specialist social care accommodation</li> <li>• Other community facilities</li> <li>• Highway works, pedestrian and cycling facilities, and public transport improvements</li> <li>• Improvements to the public realm</li> <li>• Waste management and</li> </ul>		<p>justification. The threshold has also been reduced from 20 to 10 units which will have a beneficial effect on the provision of infrastructure. The inclusion of nature conservation progresses biodiversity objectives and further improves the policy. The intention of the policy remains unchanged and therefore there is no requirement for further SA.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<ul style="list-style-type: none"> <li>recycling</li> <li>• Drainage and sewerage works</li> <li>• Flood risk mitigation measures</li> <li>• Nature conservation</li> </ul> <p><u>Policy Justification</u></p> <p>3.17.1 For the purposes of the LDP, community infrastructure is considered to be the structural elements that provide the framework for supporting the activities of society. It can be represented by any of the categories stipulated in Policy BW17 above but may also extend into other topic areas.</p> <p><b>Existing infrastructure provision</b></p> <p>3.17.2 The implications of infrastructure capacity were considered as part of the early stages of the LDP process and led to the emergence of a preferred option from three strategic alternatives. In taking forward the spatial elements of the <i>Preferred Strategy</i></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>preferred option, the <del>deposit</del> Plan <del>makes</del> has made land use allocations in accord with the level of existing infrastructure provision or where <del>it considers that</del> additional capacity can realistically be provided as part of <del>any new</del> development. <del>Proposals under consideration. In a small number of cases, the Plan has directed development to areas where there are known inadequacies with existing infrastructure provision (e.g. play space) so that improvements can be promoted, funded and introduced through subsequent development proposals.</del></p> <p><b>New or improved infrastructure</b></p> <p>3.17.3 As new developments often place a burden on existing infrastructure and create requirements for new or enhanced facilities, it is only appropriate that a proportion of the increased value of the land should be returned to the community through appropriate</p>		

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		<p>benefits. These benefits should be reasonably related in scale and kind to the development proposed. This does not mean however, that they have to be restricted to the site itself. For example, where a major development is proposed, this may have a significant impact on potential traffic generation. It may therefore be appropriate for the developer to contribute to investment in public transport enhancement or highway improvements. <del>Developers may also be expected to make a contribution towards the provision of improved education facilities, drainage enhancement, the provision of open space and play space or affordable housing.</del></p> <p><b>Planning obligations</b></p> <p>3.17.4 The LDP sites that are expected to generate planning obligations are those housing allocations of <del>20</del> 10 units or more included in the schedule of housing sites at</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Appendix 4. It should be noted however, that obligations which may not be solely limited to <del>those allocated sites.</del> <del>Are justified by the fact that it is primarily new housing development which places the greatest burden on existing infrastructure and the threshold of 20 dwellings applies owing to the fact that the majority of residential site allocations in the LDP carry the capacity for at least this number of units.</del> <del>An indication of the particular requirements (what, how and when) is given where possible and cross-reference to Policy AS17 and Policy TB4 may also be necessary.</del></p> <p>3.17.5 Individual Council departments will be responsible for <del>elaborating on</del> stating the precise level and nature of their requirements as part of the planning application process with obligations only being sought where <del>they remedy</del> there is an identified need <del>identified planning constraints as</del></p>		



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		<p>outlined in Appendix 4. The level of provision required will be based on <del>the particular</del> recognised formulae <del>of these</del> used by individual departments, for example, the Fields In Trust 6 acre standard. <del>According to their priorities at any given time and do not therefore form part of the LDP.</del> However, <del>in setting requirements,</del> when finalising Section 106 agreements, a balance will need to be struck <del>between departmental priorities,</del> ensuring that development remains viable and <del>realising</del> the strategy of the LDP is realised.</p> <p><b>Utilities</b></p> <p>3.18.4 In relation to infrastructure provided by the utility companies, <del>consultation</del> engagement has taken place throughout the LDP process to confirm the appropriateness of land allocations and to ascertain their compatibility with existing <del>and,</del> where known, future public</p>		



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		<p>investment strategies. <del>Where possible, consideration of the long-term investment implications has also been made with positive outcomes.</del> Where allocated sites have been identified as requiring essential infrastructure works that may not be funded through the public purse, the need for planning obligations has been identified as part of the schedule of housing sites at Appendix 4. <del>Reference to Policy BW8 may also be relevant.</del></p> <p>Related strategic objectives: SO6; SO8; SO9; SO10 Complementary policies: BW7; BW8; AS17; AS22; TB10</p>		
<b>Policy BW18: Contaminated Land</b>				
Proforma 25	Policy BW18 and Paragraphs 3.18.1- 3.18.4	<b>Policy BW18: Contaminated Land</b> <b>Where Development is proposed on a site</b>	The Council was requested to provide clarification of the policy.	The amendments to the policy wording do not affect the intention of the policy and the



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		<p>known or reasonably believed to be contaminated, <del>a site assessment will be required</del> <b>a site assessment</b> to establish the nature and extent of the contamination prior to determining the application. Development will not be permitted unless <b>it is demonstrated that</b> effective measures <b>can be</b> taken to treat or control any contamination in order not to:</p> <ul style="list-style-type: none"> <li>• Expose occupiers of the development land and neighbouring land to unacceptable risk</li> <li>• Contaminate any watercourse, water body or aquifer</li> <li>• Cause the contamination of adjoining land or allow the contamination to continue.</li> </ul> <p><b>Permission for development will normally require that Where</b> suitable remedial measures are agreed with the authority, <b>these</b> must be completed before the development commences.</p> <p><b><u>Policy Justification</u></b></p> <p>3.18.1 One of the requirements of the planning system is to guide</p>		deletion of the phrase "will normally require" improves the performance of the policy against the SA objectives for health. It is considered that no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>development in order to lessen the risk from both natural and man-made hazards including risks from land contamination. Whilst the system should not necessarily prevent the development of such land (although this could be the most appropriate response in some cases), it should ensure that any development undertaken is suitable for the land concerned and that the physical constraints of the land are fully taken into account.</p> <p>3.18.2 The responsibility for determining the extent of contamination rests with the developer who must also ensure that the land is suitable for the proposed development. However, the Council must take into account any implications on public health and ensure that new development is not undertaken without an understanding of the risks involved; also that development does not take place without appropriate remediation, having regard to both the natural</p>		



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		<p>and <del>historic</del> built environment.</p> <p>3.18.3 The LDP recognises that primarily because of Merthyr Tydfil's industrial legacy, certain areas of land in the County Borough remain potentially contaminated. Furthermore, that the remediation of such land may be required before it can be brought back into beneficial use. As a means of alerting interested parties to the potential of contamination, the Council is required to maintain a register of contaminated land and this has been taken into account in preparing the LDP. The register is also used to inform developers whether potential risks are known to exist and to what extent further investigations may be necessary.</p> <p>3.18.4 The above policy <del>has been formulated in order to reflect the fact that where contamination is</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>known or is reasonably believed to exist, a site assessment will be required prior to the determining of a planning application. In this way, it</del> is intended to protect public safety whilst helping to realise one of the primary aims of the LDP i.e. to promote regeneration through the use of suitable and appropriate brownfield land rather than greenfield sites. Within this context, it is recognised that on some sites, in order to successfully fund decontamination works, a phased approach to remediation may be necessary.</p> <p>Related strategic objectives: SO3</p> <p>Complementary policies: BW1; BW2; BW3; BW5; BW6; BW7; BW8</p>		
<b>Policy AS6: Local Nature Conservation Designations</b>				



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
Proforma 25	Policy AS6 and paragraphs 4.6.1 - 4.6.5	<p><b>Policy AS6: Local Nature Conservation Designations</b></p> <p><b>Using published scientific criteria, Sites of Importance for Nature Conservation have been designated as shown on the LDP Proposals Map. Applications for development affecting these sites and /or the Cwm Taff Fechan Local Nature Reserve, will not be permitted unless full account has been taken of the relevant features so as to prevent unacceptable damage to their conservation value. Where <del>planning permission is contemplated</del> appropriate, planning conditions or the seeking of a planning agreement <del>may</del> will be necessary employed to safeguard and /or enhance features, or to provide appropriate mitigation and /or compensatory measures.</b></p> <p>4.6.1 <u>Policy Justification</u> Sites of Importance for Nature Conservation (SINCs) are sites of substantive nature conservation value and are the most important</p>	The Council was requested to remove duplication of policy within the supporting text and remove any ambiguity in the wording.	The policy now makes it clear that planning conditions or agreements will be used to safeguard nature conservation interests and provide mitigation or compensatory measures where required. These changes strengthen the policy and better progress the biodiversity objectives of the LDP. Policy within the supporting text are removed as requested and is now embodied within the policy. It is considered that no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>places for wildlife outside legally protected land such as Sites of Special Scientific Interest (SSSIs). Their importance is significant in a more localised context than internationally or nationally designated sites but unlike SSSIs, SINC designations are non-statutory. They can, however, add value to the planning process in appropriate areas where more mainstream planning policies do not provide the necessary protection.</p> <p><b>SINC proposals</b></p> <p>4.6.2 A successful SINC system requires rigorous scientific criteria to enable sites to be identified. The criteria used for the LDP are the <i>Criteria for the Selection of Sites of Importance for Nature Conservation in the County Borough Councils of Caerphilly, Merthyr Tydfil and Rhondda-Cynon-Taff (Mid Valleys Area) (2008)</i> which have resulted in 60</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>areas being designated across the LDP area for their particular local nature conservation interest. <del>These include a wide variety of habitats ranging from ancient semi-natural woodlands, wetlands, and unimproved species rich grassland to rock outcrops.</del> All SINC are shown on the LDP proposals map and are also listed at Appendix 1. A <i>SINC Survey Summary Report</i> has also been produced as supporting documentation to the Plan.</p> <p>4.6.3 The distribution of SINC accords with the spatial priorities of the LDP and in making planning and development decisions, the Council will afford appropriate weight to SINC in order to secure the well-being of individual features and to maintain or enhance the character and integrity of the wider designation.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>SINCs are not intended to unduly restrict acceptable development - rather, their primary role is to ensure that development proposals affecting a SINC site receive proper consideration at the planning application stage.</p> <p><b>Development affecting SINCs</b></p> <p>4.6.4 In the cases where landowners are not currently aware of SINC designations, the presence of a SINC in a proposed development site will usually be identified during a pre-application enquiry to the Council. At that stage, the extent and type of development will be considered against the features of the SINC and requirements for ecological survey and assessment work will be identified to the planning applicant. Advice will be given on the extent and scope of work required in order to help</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>inform the Councils' final planning decisions.</p> <p><del>4.6.5 Where planning permission for development is contemplated, it may be necessary to use planning conditions and /or planning agreements to safeguard the nature conservation value of the site or provide appropriate compensatory measures by enhancement of existing habitats and the creation of new ones (either on site and /or elsewhere).</del></p> <p>4.6.5 The above policy is intended to apply to development proposals affecting all sites with non-statutory nature conservation designations. For this reason, it is also relevant to the existing Cwm Taf Fechan Local Nature Reserve, which is managed by the Council.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		Related strategic objectives: SO5; SO11  Complementary policies: BW5; AS4; AS5; AS15; TB13		
<b>Policy AS7: Waste Management Facilities – Locations Of Choice</b>				
Proforma 25	Policy AS7 and paragraphs 4.7.1. – 4.7.11	<p><b>Deletion of Policy AS7 and all policy justification and replacement with :</b></p> <p><b>Policy AS7: Waste Management Facilities – locations of choice</b></p> <p><b>The LDP adopts a hierarchical approach to waste management whereby the preferred option is waste minimisation/avoidance; followed by product re-use; then recovery, firstly through recycling and composting and secondly through energy from waste; and finally safe disposal.</b></p> <p><b>Using regional search criteria, the following locations are identified in order to help meet regional and local waste management needs:-</b></p> <ul style="list-style-type: none"> <li>• <b>B2 employment sites – as areas of search for appropriate waste</b></li> </ul>	The Council were requested to Consider the relationship of this policy to Policy TB10.	<p>Although the policy and justification are presented as being deleted in their entirety, there are few differences between the original policy and justification the proposed replacement wording.</p> <p>Policy AS7 now includes a final paragraph which imposes a requirement to illustrate why development for waste management facilities should be allowed outside the identified areas of search i.e. the existing B2 employment sites. This will progress landscape and land and soils objectives by ensuring that land already in</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>management facilities to meet the estimated land requirement of up to 3.2 hectares.</b></p> <ul style="list-style-type: none"> <li><b>Trecatty – safeguarded for continued necessary landfill of residual and unavoidable wastes.</b></li> </ul> <p><b>Where new waste facilities fall outside B2 employment sites, applicants will be required to demonstrate why these identified areas of search are unsuitable for the development proposed.</b></p> <p><u>Policy Justification</u></p> <p>4.7.1 The land use planning framework for the sustainable management of waste including the recovery of resources is provided by the South-East Wales Regional Waste Plan 1<sup>st</sup> Review (2008), which has been prepared in accordance with the provisions of TAN 21 (2001). These documents require that sufficient and appropriate waste management facilities are put in place to achieve</p>		<p>industrial/employment use is used before greenfield sites.</p> <p>The policy justification now cross references to Policy TB10 in paragraph 4.7.6 and introduces management of green waste in paragraph 4.7.7.</p> <p>The amendments improve the performance of the policy against SA objectives and it is considered that no further SA is required.</p>

REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p data-bbox="824 448 1227 635">Landfill Directive targets by 2013 and that, in doing so, a hierarchical approach to waste management is followed, incorporating the best practical environmental option.</p> <p data-bbox="685 671 1227 986">4.7.2 The LDP takes forward the two primary elements embedded in the Regional Waste Plan 1<sup>st</sup> Review (i.e. the Technology Strategy and the Spatial Strategy) in deciding what additional waste management facilities are required in Merthyr Tydfil and where they should be located.</p> <p data-bbox="685 1023 1227 1334"><b>In-building facilities – B2 employment sites</b> 4.7.3 Policy AS7 sets out the locations of choice for the siting of new in-building waste management facilities in the County Borough in order to help realise the Preferred Options of the Regional Waste Technology Strategy. All such areas are shown on LDP proposals map as</p>		



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		<p>4.7.4 Areas of Search for Waste Management Facilities and are listed at Appendix 7.</p> <p>B2 'general industrial' employment sites are widely acknowledged to be suitable locations for the new generation of in-building waste management facilities. The Regional Waste Plan's Spatial Strategy estimates that the total land area required in Merthyr Tydfil for new in-building facilities by 2013 ranges from between 1.1 to 3.2 hectares depending on the type of waste management /resource recovery facility involved. There is, however, approximately 10 hectares of new B2 'general industrial' employment land allocated within the LDP which is considered sufficient to allow both choice and flexibility to the waste management industry and to meet the County Borough's future employment</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>needs. For additional choice and flexibility, existing Class B2 'general industrial' employment sites are also identified as areas of search for waste management facilities.</p> <p>4.7.5 Whilst the Plan gives an 'in principle' commitment to new facilities being established, it is acknowledged that actual provision must be subject to the most rigorous evaluation. As such, development proposals for new and expanded in-building waste management facilities will also be assessed against criteria-based policy TB10.</p> <p><b>Open-air facilities</b></p> <p>4.7.6 No new land allocations for open-air facilities, which serve municipal waste streams, have been made within the local development plan due to collaborative arrangements with other local authorities. For</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>instance, the Authority is currently working in partnership with Rhondda Cynon Taff County Borough Council to secure waste treatment facilities that will process municipal waste, including green waste, for both local authorities. Following an earlier evaluation of potential sites, it is anticipated that these waste treatment facilities will be accommodated at a preferred location within Rhondda Cynon Taf.</p> <p>4.7.7 Unforeseen development proposals for open-air waste management facilities that serve other waste streams will be assessed against criteria-based policy TB10.</p> <p><b>Trecatty Landfill</b> 4.7.8 Trecatty landfill at Dowlais Top continues to form the principal destination for much of the residual and unavoidable waste</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>generated in Merthyr Tydfil. As a regional open-air waste management facility, the site also imports material from certain neighbouring authorities in accord with the best practical environmental option and the proximity principle. The current Waste Management Licence permits the disposal of household waste together with industrial and commercial wastes including residual treated solid waste. The site has a remaining capacity of 7Mm<sup>3</sup>, which gives a life expectancy to 2022-2024 depending on the level of input.</p> <p>Related strategic objectives: SO3; SO5; SO7 Complementary policies: TB10</p>		
<b>Policy AS9: Strategic Highway Improvements</b>				
Proforma 25	Policy AS9 and Paragraphs 4.9.1 4.9.4	Minor amendment to Policy AS9 and deletion and replacement of paragraph 4.9.2	The Council was requested to rectify the situation whereby additional policy was contained	The amendment clarifies that the policy refers to only one strategic highway



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>Policy AS9: Strategic Highway Improvements</b></p> <p><b>Land will be safeguarded from development where it would prejudice the implementation of the A465 (T) strategic highway improvement scheme.</b></p> <p><u>Policy Justification</u></p> <p>4.9.1 The highway strategy of the LDP is set out within the context of the draft <i>Regional Transport Plan</i> and the <i>Local Transport Plan</i> which seek to ensure that an effective and readily accessible road system is provided and maintained as a fundamental part of an integrated network of national transport infrastructure.</p> <p><del>4.9.2 In order to facilitate the most efficient use of the highway network and in order that acceptable environmental, amenity and safety conditions can be created/maintained, a road hierarchy has been established</del></p>	within the text.	<p>improvement. Paragraph 4.9.2 is amended to provide factual information on the strategic highway routes in the County Borough.</p> <p>These changes do not affect the original SA and no further SA is required.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>whereby traffic generation and development access will only be permitted adjacent to roads within the appropriate level of the hierarchy. The hierarchy consists of strategic highway routes, the core highway network, roads of local importance and, finally, minor and access roads.</del></p> <p>4.9.2 In Merthyr Tydfil, the <b>strategic highway routes</b> are :-</p> <ul style="list-style-type: none"> <li>• the A 470(T), which runs in a north-south direction throughout the entire length of the County Borough.</li> <li>• the A 465(T), which runs east-west across the head of the Taff Valley.</li> <li>• the A 4060(T), which provides a direct connection between the A 470(T) and the A465(T) on the eastern flank of the main Merthyr settlement.</li> </ul> <p>4.9.3 The LDP anticipates that the</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>strategic highway network will continue to play a crucial part in improving overall levels of accessibility and promoting sustainable economic growth in the County Borough. Dualling of the section of the A465(T) between Abergavenny and Hirwaun has long been identified as a strategic highway improvement scheme by the National Assembly for Wales. It is considered that upgrading this important route is fundamental in achieving successful regeneration in the Heads of the Valleys and is especially important for Merthyr Tydfil if its role as the key primary settlement in that area is to be fully realised.</p> <p>4.9.4 The section of the A465 that traverses the County Borough will be improved through the construction of an additional</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>carriageway. The road will continue to follow the line of the existing route with only marginal widening to the north or south and improved intersections with other highways. Appropriate land will be safeguarded from development where it would have the effect of prejudicing this scheme.</p> <p>Related strategic objectives: SO4; SO7</p> <p>Complementary policies: BW1; BW8; BW11; BW12; AS4; AS6; AS10; AS12; TB11</p>		
<b>Policy AS12: Public Transport</b>				
Proforma 25		<p><b>Policy AS12: Public transport - road</b></p> <p><b>Development proposals that lead to the improvement of bus services in the County Borough will normally be supported. The remodelling of Merthyr Tydfil Central Bus Station will be favoured</b></p>	The Council were requested to remove duplication of policy and remove ambiguity in the wording of the policy justification.	The wording of the policy is now more robust through the deletion of the word normally replacement of <i>favoured</i> with supported. However the amendments have no significant effect and no further SA is considered necessary.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>supported as part of town centre regeneration.</b></p> <p><u>Policy Justification</u></p> <p>4.12.1 The above policy complements Policy BW11 and aims to provide an accessible bus network throughout the County Borough as a realistic alternative to the use of the private car. This is especially important as, in Merthyr Tydfil, the proportion of households with no car is higher than the Wales and the UK average at 44 per cent. Reliance on public transport is therefore relatively high.</p> <p>4.12.2 The County Borough Council already subsidises certain services that are not seen as commercially viable by Merthyr's private bus operators. Such services are deemed to be socially necessary by the Authority and tend to be evening and Sunday operations.</p> <p><del>Support for bus services will continue wherever possible and where proposed improvements to</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>services have land use implications they will generally be considered favourably by the Authority providing that detailed planning considerations can be met.</del></p> <p>4.12.3 In the town centre, it will be necessary to <del>maintain</del> provide a bus station of sufficient quality and capacity to meet likely future demands. It is therefore proposed that the facilities presently available be improved through the remodelling/reconstruction of the existing site. Whilst a new bus station could be provided in its own right, it is much more likely to be provided as part of a wider development scenario utilising vacant land to the immediate west. In respect of the latter, opportunities exist for a combined transport /retail development and cross-reference to Policy AS20 (retail allocations) is relevant in this regard.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		Related strategic objectives: SO4; SO8  Complementary policies: BW11; BW12; BW17; AS9; AS10; AS11; AS20		
<b>Policy AS13: Life-Long Learning Facilities</b>				
Proforma 25	Policy AS13 and Paragraphs 4.13.1 – 4.13.8	<p><b>Policy AS13: Life-long learning facilities</b></p> <p><b>Land use allocations have been made on the LDP Proposals Map <del>to help facilitate</del> in order to support the delivery of life-long learning improvements as follows:-</b></p> <ul style="list-style-type: none"> <li>• the expansion of campus facilities at the University of Glamorgan (Merthyr Tydfil) (LL1)</li> <li>• the construction of a new Welsh language primary school at Penyard (LL2)</li> <li>• the construction of a new primary school at Aberfan (LL3)</li> <li>• <del>the relocation of Cyfarthfa Lower School to Cae Mari Dwn will also be supported.</del></li> </ul>	The Council was requested to provide clarity in the policy and rationalise the supporting text.	The amendments comprise minor alterations to the policy which do not alter the intention or meaning of the policy or the justification. It is not considered that further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>The relocation of Cyfarthfa Lower School to Cae Mari Dwn will also be supported.</b></p> <p><u>Policy Justification</u></p> <p>4.13.1 The Council considers that raising standards of education will be a major factor in making Merthyr Tydfil a more desirable place in which to live and will help facilitate the process of regeneration through providing increased future demand for quality accommodation, services and facilities.</p> <p><i>UNIVERSITY CAMPUS</i></p> <p>4.13.2 In 2006, Merthyr Tydfil College became affiliated to the University of Glamorgan as part of a move to increase the number and diversity of courses available. The Council fully supported this move</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>as it helped fulfil particular Council priorities relating to:-</p> <ul style="list-style-type: none"> <li>• Increasing life-long learning opportunities</li> <li>• Providing much needed local skills and training</li> <li>• Improving prospects for the local job market</li> <li>• Facilitating regeneration.</li> </ul> <p><del>4.13.3 Whilst certain, largely cosmetic improvements have been affected to the structure of the university buildings since the affiliation took place, the physical expansion of facilities that might unlock the true potential of the campus has yet to be fully realised.</del></p> <p>4.13.3 Therefore, in order to help maintain recent momentum and derive greater benefits from a university presence in the town,</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>the LDP has allocated land as shown on the LDP Proposals Map to help facilitate the required improvements. Though the exact nature of expansion remains to be finalised, the Plan offers 'in principle' support for the establishment and promotion of a 'Merthyr Learning Quarter' the need for which will arise from:-</p> <ul style="list-style-type: none"> <li>• the setting up of a sixth form tertiary college</li> <li>• enhanced opportunities for vocational training</li> <li>• 'natural' growth resulting from successful realisation of the LDP's strategy.</li> </ul> <p><i>SCHOOLS</i></p> <p>4.13.4 The Council's priorities for putting the physical infrastructure in place to deliver an modern and effective schools service is provided through the <i>School Organisation Plan 2004-2009</i> and</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>will be taken forward in future through the <i>Children and Young Peoples Plan</i>. As part of the drive to ensure improved opportunities for Welsh language education in Merthyr Tydfil, a new facility for Ysgol Santes Tudful primary school will be provided at a site in Penyard <del>A corresponding land use allocation has been made on the LDP proposals map and it is anticipated that development will be completed</del> during the <b>early first</b> part of the plan period.</p> <p>4.13.5 The need for a new primary school at Aberfan arises from the reorganisation of primary and secondary education to deliver long-term improvements across the County Borough. The new school, <b>which will be provided during the first part of the plan period</b>, will also help facilitate the regeneration of Aberfan and</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Merthyr Vale as part of the Project Riverside development. <del>The LDP land use allocation reflects the Council's intention to provide a new facility during the early part of the plan period. Though located in a C1 flood zone, outline planning consent for development was granted in January 2008 following a public inquiry that considered the wider Project Riverside scheme including a detailed flood consequence assessment.</del></p> <p>4.13.6 The <del>proposal to</del> relocation of Cyfarthfa Lower School to Cae Mari Dwn is a long-standing commitment of the Council owing to the inappropriate nature of Cyfarthfa Castle for continued educational use. It is considered that bringing together both Upper and Lower Schools on a single site will help deliver resource</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>efficiencies as well as freeing up a large proportion of Cyfarthfa Castle for leisure and tourism related uses as set out at LDP Policy AS15.</p> <p><del>4.13.8 In order to assist in the continuous improvement of education provision across the County Borough during the plan period, the Council will seek financial contributions from developers through the implementation of Policy BW17. This aims to secure the provision of community infrastructure benefits through the developments identified at Appendix 4.</del></p> <p>Related strategic objectives: SO1; SO3; SO8</p> <p>Complementary policies: BW7; BW8; BW12; BW15; BW17; AS15;</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		TB11		
<b>Policy AS16: New Leisure Developments</b>				
Proforma 25		<p><b>Policy AS16: New leisure developments</b></p> <p><b>Land required for the completion of a major leisure developments at Rhydycar (L1) and Swansea Road (L2) is delineated on the LDP Proposals Map. Development proposals that enhance the leisure potential of these this sites will be favoured subject to satisfying other relevant policies of the LDP.</b></p> <p><b>Policy Justification</b></p> <p>4.16.1 For many years, the Council has sought to bring a wider variety of contemporary leisure opportunities to the County Borough. By delivering a broader choice in the facilities and pastimes available, the Council intends to demonstrate its commitment to increasing the community's</p>	The Council was requested to update references in the policy and supporting text and add references to national policy.	<p>As the consent granted on the Swansea Road retail and leisure site has now been implemented, the site is a commitment rather than an allocation and as such is removed from the plan.</p> <p>The removal of reference to Swansea Road makes no difference to the outcome of implementation of the policy. Therefore it is considered that no further SA is required.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>participation in physical activity and securing improvements in lifestyle and health. It also intends to make the County Borough a more sustainable place to live with facilities worthy of 21<sup>st</sup> Century expectations.</p> <p><b>Rhydycar</b></p> <p>4.16.2 <del>A land use allocation to help facilitate the redevelopment of the existing Rhydycar Leisure Centre site was originally made in the Merthyr Tydfil Borough Local Plan in 1994. The site</del> A land allocation has been made at Rhydycar which measures 9.60 hectares. The site is strategically located on one of the main approaches to the town centre, is highly accessible, being situated adjacent to the strategic highway network and is close to all major public transport facilities. It therefore has an extensive catchment area and has the potential to develop a regional</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>leisure role during the LDP period.</p> <p>4.16.3 Physical redevelopment of the leisure centre and the adjacent playing fields commenced in 2007 following the granting of outline planning consent. On completion, the site will provide a state-of-the-art swimming pool, a gymnasium/fitness centre, an 8-screen cinema, <del>a bowling alley</del>, a hotel and a number of restaurants. Detailed proposals to complete the early redevelopment of this site will be favoured so that Rhydycar not only offers a wider range of sports and fitness-based activities for all abilities but also provides more commercially orientated leisure and entertainment opportunities serving the Heads of the Valleys.</p> <p><b>Swansea Road</b></p> <p><del>4.16.4 The Swansea Road site measures approximately 18.5 hectares and</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>occupies an area of previously developed land between the communities of Gollideg and Heolgorrig to the west of the main Merthyr Tydfil settlement.</p> <p><del>4.16.5 The site is readily accessible from the A470(T) /A4102 and benefits from outline planning consent which includes the construction of a retail development on the adjacent land (see Policy AS20). Implementation of the consented scheme which includes ornamental gardens, a miniature railway, a boating lake and a go-cart track is expected to occur during the middle part of the plan period further diversifying the strategic leisure opportunities available in the County Borough.</del></p> <p><b>Other major leisure proposals</b></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>4.16.4 As part of the process of preparing the LDP, the Council commissioned a <i>Retail &amp; Commercial Leisure Capacity Study</i> (2008) to help ascertain the likely need for further commercially based leisure opportunities to be established in the County Borough during the plan period. Whilst the study concluded that there will be little need for further facilities over and above those schemes allocated in the LDP, the Council recognises that proposals may still come forward for new or replacement facilities as part of the development process.</p> <p>4.16.5 Developers proposing major commercial leisure developments on land unallocated by the Plan are directed to adopt a sequential approach, as set out in <i>Planning Policy Wales (2010)</i> paras 10.2.9 to 10.2.13, in their selection of sites</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>with first priority being given to suitable town centre sites where land or buildings for conversion are available; then edge of centre sites and, finally, out of centre sites in locations accessible by a variety of means. This is to avoid such facilities being developed at locations outside of existing centres where the commercial advantages of large scale, purpose built facilities and extensive car parking might exist but where there is little or no contribution to regeneration or maintaining the vitality and viability of existing centres or reducing the need to travel and levels of dependency on the car.</p> <p>Related strategic objectives: SO1; SO3; SO7; SO8; SO9</p> <p>Complementary policies: BW1; BW7; BW8; BW12; BW16; AS1; TB11</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
<b>Policy TB2: Unallocated sites within settlement boundaries</b>				
Proforma 25	Policy TB2 and policy justification	<b>Deletion of Policy TB2 and policy justification</b>	The Council was requested to Remove duplication with other policies, principally TB1 and TB3	The policy was deleted in consequence of amendments to policy BW4 – Settlement Boundaries which now covers this issue. In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect and no further SA is required.
<b>Policy TB3: Changes of use within settlement boundaries</b>				
Proforma 25	Policy TB3 and policy justification	<b>Deletion of Policy TB3 and policy justification</b>	The Council was requested to remove duplication with other policies, principally TB1 and TB2.	The proforma provides a table illustrating how proposals for changes of use can be assessed and managed by the use of other plan policies. In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect and no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
<b>Policy TB5</b>				
Proforma 25	Policy TB5 and paragraphs 5.5.1 – 5.5.3	<p><b>Deletion of criteria 2-6 of the policy.</b></p> <p><b>POLICY TB5</b></p> <p><b>Development proposals for special needs such as community care provision, institutional, residential and nursing homes will be permitted subject to consideration against the following criteria:-</b></p> <ol style="list-style-type: none"> <li><b>1) The proposal <del>must be</del> is located within identified settlement boundaries unless it can be demonstrated that no appropriate site exists to accommodate a facility for which there is <del>qualitative and quantitative</del> identified need.</b></li> <li><b><del>2) The proposal must be acceptable in terms of its siting, scale, design and materials.</del></b></li> <li><b><del>3) The proposal must not have an unacceptable impact on the character and amenity of immediate neighbourhood.</del></b></li> <li><b><del>4) The proposal must not have an</del></b></li> </ol>	The Council were requested to remove duplication with other policies, principally TB6.	The policy removes reference to design, landscape, biodiversity and water environment interests and as such this specific policy will not perform as well as the earlier version. However, In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect and no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>unacceptable impact on the character, amenity and landscape quality of the area including any historical features present.</del></p> <p><del>5) The development must not pose an unacceptable risk to nature conservation interests including habitats and species present within the site and within the vicinity of the site.</del></p> <p><del>6) The development must not pose an unacceptable risk to the water environment including watercourses, groundwater catchment areas and river quality.</del></p> <p>7) The proposal must not conflict with transportation considerations including access, parking, traffic generation, accessibility to public transport and enjoyment of public rights of way.</p> <p>8) The proposal must be capable of being provided with the relevant utility services and infrastructure.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><u>Policy Justification</u></p> <p>5.5.1 Many people have housing needs that cannot be adequately satisfied by conventional housing stock. Since it is important that all people are able to live as independently as possible in their own homes or in homely surroundings as part of the community, the Council, where appropriate, will encourage the development of special needs housing to meet the requirements of specific groups within the local population. This might include:</p> <ul style="list-style-type: none"> <li>• people with physical, or mental health problems,</li> <li>• those with learning difficulties,</li> <li>• the elderly,</li> <li>• groups dependent on state benefits and residing</li> </ul>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<ul style="list-style-type: none"> <li>• in multiple occupation, vulnerable mothers with children,</li> <li>• young people and those at risk from violence,</li> <li>• ex offenders and people with alcohol and drug rehabilitation problems.</li> </ul> <p>5.5.2 Special needs housing can be provided through a diverse range of development for example residential/nursing homes, sheltered housing schemes, housing estates of adapted units etc. Consequently, their physical form can be markedly different from conventional homes and it is important that any proposals for development of such housing have regard to the <del>surrounding</del> environmental context, ensuring that development is sensitively integrated with <del>the existing urban</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>form</del> its surroundings.</p> <p>5.5.3 Where conversion of existing buildings takes place, for example, to allow for multiple occupation, the <del>County Borough</del> Council will adopt a sympathetic approach to the new use but will still require that the above criteria and <del>that of Policy TB3</del> other relevant policies of the Plan are <del>not</del> satisfied.</p> <p>Related strategic objectives: SO6</p> <p>Complementary policies: BW5; BW6; BW7; BW8; AS4; AS5; AS6; TB11; TB13</p>		
<b>Policy TB10: Waste Management Sites</b>				
Proforma 25	Policy TB10 and paragraphs 5.10.1 – 5.10.4	<p><b>Deletion of original Policy TB10 and all policy justification.</b></p> <p><b>Policy TB10 Waste Management Facilities</b></p> <p><b>Development proposals for new and</b></p>	The Council was requested to consider the relationship of this policy to Policy AS7.	Policy AS7 has been revised (see page 89 of this document). Neither the revised Policy AS7 or this policy refer to character, landscape, water or nature conservations



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b>expanded in-building and open air waste management facilities other than those involving new landfill capacity/sites will be permitted subject to consideration against the following criteria:-</b></p> <ol style="list-style-type: none"> <li><b>1. There is demonstrable need for the proposal within the context of the County Borough's waste management requirements and/or regional need.</b></li> <li><b>2. The proposal must not have an unacceptable impact on the health and amenity of neighbouring land uses including the effects of dust and other emissions, noise and odours.</b></li> <li><b>3. The proposal must not conflict with transportation considerations including access, parking, traffic generation, accessibility to public transport and enjoyment of public rights of way.</b></li> </ol>		<p>interests as in the deleted policy TB10. Therefore this specific policy does not perform as well against these specific interests. In terms of the sustainability of the LDP, which should be read and used a whole, the deletion has no significant effect due to other plan policies which will be material considerations when assessing planning applications for this type of development. Therefore it is considered that no further SA is required although reinstatement of the deleted criteria would improve the revised policy. This is particularly relevant in relation to the water environment which can be polluted by waste management activities.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>5.10.1 The demanding requirements of the National Waste Strategy and EU Directives may result in proposals for waste management facilities coming forward during the Plan period. The Council recognises the importance of facilitating a fully integrated waste management network and will strive to assist in the drive to a more sustainable future.</p> <p>5.10.2 Policy TB10 has been formulated to ensure that this is achieved without harm to amenity and the environment and will enable a detailed assessment of the impacts of new and expanded in-building and open-air waste management facilities.</p> <p>5.10.3 Other Borough Wide and Area Specific policies will need to be applied depending on site and waste management facility characteristics. Independent</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>surveys and assessments will also be required in certain circumstances.</p> <p>5.10.4 As a necessary component of an integrated approach to waste management in the region, the use of Trecatty landfill will continue throughout the plan period. Given there is no identified shortfall in landfill capacity over the plan period, new and expanded landfill facilities are not currently considered necessary. The reduction in landfill capacity will be monitored as part of the Plan's monitoring framework.</p> <p>Related strategic objectives: SO5; SO11 Complementary policies: BW4; BW5; BW6; BW7; BW8; BW12; BW18; AS7</p>		
<b>Policy TB11: Access, Parking And Accessibility Of Local Facilities</b>				
Proforma 25	Policy TB11 and paragraphs 5.11.1 – 5.11.4	<p><b>Policy TB11</b></p> <p><b>Proposals for the development, redevelopment and improvement of land</b></p>	The Council was requested to provide clarity in the policy and rectify the situation whereby policy is contained within the supporting	The amendments update the policy to refer to the most recent guidance contained in the Manual for Streets. There



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>and buildings</del> should normally ensure that:-</p> <ul style="list-style-type: none"> <li>any new highways are <b>designed and</b> constructed in accordance with the <del>Council's adopted</del> Manual for Streets <del>or Design Guide for Residential, Commercial and Industrial Estate Roads as appropriate,</del> and include operational and non-operational parking provisions according to adopted standards set out in CSS Wales - Wales Parking Standards and the land use, density and location proposed.</li> <li>the access needs and mobility requirements of all sections of the community, particularly those with special needs and disabilities, are met.</li> </ul> <p><b>Should it be proposed to use reduced standards of highway design or construction, the proposal must be fully explained and justified.</b></p>	text.	are no significant changes to the content or intent of the policy and as such, it is considered that no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b><u>Policy Justification</u></b></p> <p><del>5.11.1 The LDP has successfully achieved the majority of its land allocations near to public transport routes. Most allocations are also adjacent to highways considered appropriate to serve such development and, in the limited number of instances where this is not the case, the Council considers that the necessary highway and access improvements can be delivered as part of future proposals for development.</del></p> <p>Highway design and parking provision</p> <p>5.11.2 The above policy has been formulated to ensure that the principles of sustainability and inclusiveness embodied in LDP's pattern of land allocation are applied to all future proposals for development and to ensure that development incorporates sufficient and appropriate access</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>infrastructure to successfully serve that development. In this regard, it is important that highways and parking provision included as part of new development are constructed in accord with adopted standards. <del>Where it is proposed for a development to use reduced standards of road design, or layout for a non-adopted road, a comprehensive Transport Assessment and Travel Plan will be required to fully explain and justify the proposal, including an assessment of highway and pedestrian safety. Where appropriate, a Section 106 Agreement may be sought to ensure satisfactory future maintenance of a non-adopted road.</del></p> <p>5.11.3 Access arrangements The inaccessibility of land, buildings and other facilities can put the safety of certain members of the community at risk and may also prevent the disabled, the</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>elderly and those with young children from playing a full role in society. Therefore, the Authority requires that all new development intended for use by employees and members of the public should be designed to be safe and fully accessible. <del>Furthermore, that wherever possible, applications for alterations or changes of use to similar existing land and buildings provide suitable access arrangements and facilities for people with special needs.</del></p> <p>5.11.4 Design and access statements are a useful way of explaining the principles and concepts that have informed a particular proposal and convey how access issues have been integrated into the development process. Much of the preliminary work that needs to be done for the design component of the statement will help inform the access component and vice versa, with the result that a more inclusive</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>approach to development should be achieved. <del>The Council will require design and access statements to accompany most non-householder types of development as means of ensuring unimpaired access for the broadest cross-section of the community.</del></p> <p>Related strategic objectives: SO4; SO8</p> <p>Complementary policies: BW4; BW7; BW11; BW12; BW17; AS9; AS10; AS11; AS12</p>		
<b>Policy BW19: Affordable Housing Target</b>				
Proforma 27	Policy BW19 and paragraphs 3.20- 3.20.4	<p>New policy and justification as below.</p> <p><b>Policy BW19: Affordable Housing Target</b></p> <p><b>During the Plan period, the Local Development Plan will provide 410 affordable dwellings across the County Borough in order to contribute to the identified level of housing need.</b></p>	The council was requested to ensure that LDP policy would effectively deliver affordable housing.	Policy AS22 replaces the former Policy TB4 which was deleted as part of the focussed changes. The SA report on the Proposed Focussed Changes, (October 2009) found that Policy AS22 was



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>3.20.1 The delivery of affordable housing is a key issue both locally and nationally. The most recent Local Housing Market Assessment (LHMA) for Merthyr Tydfil, dated February 2010, has identified that of the overall dwelling requirement in the County Borough up to 2021, 930 dwellings need to be in the form of affordable housing. The precise level of need differs between the 3 market areas identified and currently stands at 540 units in Merthyr Tydfil, 330 units in the Mid Valleys and 60 units in Treharris/Trelewis.</p> <p>3.20.2 The LDP target of 410 units is below the level of need identified within the LHMA but is nevertheless considered to be ambitious, and represents a target that is both realistic and deliverable when development viability is taken into consideration. Approximately 300</p>		<p>“considered to be a significant policy change. In the previous Policy TB4, Council sought the delivery of 950 affordable homes across the County Borough between 2006-202, representing 25 per cent of dwellings on housing sites larger than 20 dwellings. This figure has since been revised to 370 affordable homes representing 15 per cent of homes in the Primary Growth area and 10 per cent in the secondary growth area.</p> <p>This would appear to be a substantial reduction in affordable housing provision, therefore the original appraisal has been reconsidered in light of these changes. Whilst the sustainability benefits identified in the appraisal of Policy TB 4 may in theory be somewhat</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>units will be delivered through Policy AS22, which sets targets and a threshold for planning contributions on new housing development. A Rural Exceptions policy (Policy TB13) is expected to deliver the remaining 110 units.</p> <p>3.20.3 The Social Housing Grant (SHG) programme (as well as other sources of funding) is likely to deliver an additional 300 units over the Plan period with the remainder of the affordable housing requirement being met through the re-use of empty homes (funded by Section 106 Agreements and other funding streams such as recently secured SCIF).</p> <p>3.20.4 The delivery of affordable housing is dependent on a number of factors and the Council recognises that securing affordable housing must be balanced against the other policy requirements of the Plan. For further information on affordable housing, reference should be made to the</p>		<p>reduced when considering the new policy, (particularly for the SA objectives on housing and communities), the overall sustainability effect remains the same as the new policy is more reflective of the level of affordable housing that is deliverable; with consequent benefits for housing and communities."</p> <p>This new revision to the affordable housing target increases the target figure from that assessed above and therefore the comments made above with reference to housing and communities are still relevant. No further SA work is required.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>LDP Background Paper: Affordable Housing and the most recent Local Housing Market Assessment referred to above.</p> <p>Related Strategic objectives: SO2, SO6, SO10</p> <p>Complimentary policies: AS22, TB13</p>		
<b>Policy AS22: Affordable Housing Contributions</b>				
Proforma 27	Policy AS22 and paragraphs 4.22.1 – 4.22.4	<p>Policy AS22 and supporting text.</p> <p><b>Policy AS22: Affordable Housing Contributions</b></p> <p><b>In order to ensure the delivery of affordable housing across the County Borough, the LDP will require, on sites of 10 units or more, the provision of:</b></p> <ul style="list-style-type: none"> <li>• <b>10% affordable housing in the Primary and Secondary Growth</b></li> </ul>	The policy has been revised to reflect findings of the updated LHMA and LDP Background Paper.	Policy AS22 replaces the former Policy TB4 which was deleted as part of the focussed changes. These amendments now further update the policy and reflect deliverable targets in the current economic climate. Whilst reduced from earlier targets for percentage provision of affordable housing units, the policy will still bring



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p style="text-align: center;"><b>Areas</b></p> <ul style="list-style-type: none"> <li>• <b>5% affordable housing in the Other Growth Areas.</b></li> </ul> <p><b>Where applicants for planning permission can demonstrate that on-site provision of affordable housing is not possible, the Council will require a financial contribution towards the provision of affordable housing elsewhere in the County Borough.</b></p> <p>4.22.1 A considerable need for affordable housing has been identified across the County Borough and seeking appropriate levels of affordable housing in appropriate locations is an important factor in the Council's drive to achieve more sustainable communities. It is therefore important that the Council maximises affordable housing provision wherever possible.</p> <p>4.22.2 The percentage targets included in the above policy recognise that development viability in the County</p>		<p>forward the benefits identified in the SA of the earlier Policy TB4. Concern was always expressed that the 25% target could render developments unviable and therefore indirectly undermine the delivery of affordable housing. The recommendation in the Focussed Proposed Changes Report of October 2009, that the threshold number of units be incorporated in the policy has also been taken up. Therefore it is considered that there is no need for further SA.</p>



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		<p>Borough is a major consideration. These targets should therefore be treated as indicative, and negotiation will be necessary on the exact type and amount of affordable housing to be delivered on a site-by-site basis. The result of negotiations will depend on information such as viability assessments, the most up to date Local Housing Market Assessment, and other relevant information from housing stakeholders including Registered Social Landlords and the Councils' Housing Department.</p> <p>4.22.3 Where an on-site housing contribution is demonstrated not to be possible, a commuted sum of an equivalent value to the cost of providing the on-site affordable housing will be required by the Council. The decision to accept a commuted sum will be taken on the grounds that it provides a housing and planning solution, and will not</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>be in response to viability issues.</p> <p>4.22.4 For further information on the targets, thresholds and commuted sums, reference to the LDP Background Paper: Affordable Housing should be made.</p> <p>Related strategic objectives: SO2, SO6, SO10</p> <p>Complimentary policies: BW19, AS1, AS2, AS3</p>		
<b>Policy: Exception Sites for Affordable Housing</b>				
Proforma 27	New policy TB13 and policy justification	<p><b>Policy TB13: Exception Sites For Affordable Housing In The Countryside</b></p> <p><b>Development proposals for the provision of affordable housing outside and adjoining settlement boundaries identified in the LDP will be permitted where it can be demonstrated that:</b></p>	The Council was requested to consider the option of securing affordable housing in rural areas through an exceptions sites policy,	As this is a new policy it has been subject to a detailed SA which can be found in Appendix 2 attached to this report. The SA found that beneficial effects are predicted for SA objectives relating to housing, health and communities with potential



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<ul style="list-style-type: none"> <li>• <b>The proposed development cannot be accommodated within defined settlement boundaries;</b></li> <li>• <b>The site does not exceed 10 dwellings or 0.5 hectares;</b></li> <li>• <b>The proposed development is solely for the provision of affordable housing to meet an identified local need;</b></li> <li>• <b>The development is compatible with other relevant plan policies and material planning considerations.</b></li> </ul> <p>5.13.1 The purpose of Policy TB13 is to allow affordable housing to be provided in areas where there is an identified local need that cannot be met within defined settlement limits. The Council's preference will always be for development to take place within residential settlement boundaries, however, it is recognised that factors such as the</p>		<p>indirect benefits for employment objectives. Whilst potential for some adverse effects has been identified in relation to transport, landscape and biodiversity objectives, the anticipated level of development will be small and some mitigation will be possible. Therefore these effects are not considered to be significant and the overall impact to be neutral.</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>availability of land and high land values may dictate that it is not always possible to deliver affordable housing in such locations.</p> <p>5.13.2 In permitting the development of affordable housing outside settlement limits, the Council will require developers to demonstrate why development cannot take place within them, and that appropriate mechanisms are in place to ensure all dwellings are secured in perpetuity.</p> <p>5.13.3 Exception sites shall not be larger than 10 units as this fulfils the intention of national policy that rural exception sites should be "small" in size. Setting the limit at 10 dwellings also accords with the definition of a small site in both the LDP itself and the Annual Joint Housing Land Availability Study.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>Related strategic objectives: SO2, SO6, SO10</p> <p>Complimentary policies: BW4, BW19</p>		
<b>Policy TB13: Exception Sites for Affordable Housing in the Countryside</b>				
Proforma 27	New policy TB13 and paragraphs 5.13.1 – 5.13.3	<p>New policy TB13 and policy justification</p> <p><b>Policy TB13: Exception Sites For Affordable Housing In The Countryside</b></p> <p><b>Development proposals for the provision of affordable housing outside and adjoining settlement boundaries identified in the LDP will be permitted where it can be demonstrated that:</b></p> <ul style="list-style-type: none"> <li>• <b>The proposed development cannot be accommodated within defined settlement boundaries;</b></li> <li>• <b>The site does not exceed 10</b></li> </ul>	The Council was requested to consider a policy securing affordable housing through rural exception sites.	As a new policy this has been the subject of detailed appraisal which can be found in Appendix 1 below.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><b> dwellings or 0.5 hectares;</b></p> <ul style="list-style-type: none"> <li>• <b>The proposed development is solely for the provision of affordable housing to meet an identified local need;</b></li> <li>• <b>The development is compatible with other relevant plan policies and material planning considerations.</b></li> </ul> <p>5.13.1 The purpose of Policy TB13 is to allow affordable housing to be provided in areas where there is an identified local need that cannot be met within defined settlement limits. The Council's preference will always be for development to take place within residential settlement boundaries, however, it is recognised that factors such as the availability of land and high land values may dictate that it is not always possible to deliver affordable housing in such locations.</p> <p>5.13.2 In permitting the development of</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>affordable housing outside settlement limits, the Council will require developers to demonstrate why development cannot take place within them, and that appropriate mechanisms are in place to ensure all dwellings are secured in perpetuity.</p> <p>5.13.3 Exception sites shall not be larger than 10 units as this fulfils the intention of national policy that rural exception sites should be "small" in size. Setting the limit at 10 dwellings also accords with the definition of a small site in both the LDP itself and the Annual Joint Housing Land Availability Study.</p> <p>Related strategic objectives: SO2, SO6, SO10</p> <p>Complimentary policies: BW4, BW19</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
<b>Policy AS20: Retail allocations</b>				
Proforma 28	Policy As20 and paragraphs 4.20.1 -	<p><b>Policy AS20: Retail allocations</b></p> <p><b>During the plan period 2006-2021, land will be allocated for retail development at the following locations as shown on the LDP Proposals Map:-</b></p> <ul style="list-style-type: none"> <li>• <b>Merthyr Tydfil Central Bus Station (R1)</b></li> <li>• <del>Swansea Road (R2)</del></li> </ul> <p><u>Policy Justification</u></p> <p>4.20.1 As an integral part of the LDP process, the Council commissioned a <i>Retail &amp; Commercial Leisure Capacity Study</i> to ascertain the likely future retail requirements of the County Borough. This assessment concludes that, whilst there is</p>	<p>An update of the Retail and Commercial Leisure Capacity Study has been undertaken and is issued as an Addendum to that study. The Addendum is attached to Proforma 25 as Appendix 3 and concludes that there is no need for further retail commitments if aspirations for expenditure retention remain constant. Any scenario that involves increasing the retention rate by more than 2 percentage points over the plan period is unrealistic / too ambitious, especially as residents living outside the main settlement of Merthyr Tydfil (i.e. toward the edges of the County Borough) have continuing easy access to surrounding centres in</p>	<p>The changes to the plan are supported by evidence on the retail needs of the Borough.</p> <p>As the consent granted on the Swansea Road retail and leisure site has now been implemented, the site is a commitment rather than an allocation and as such is removed from the plan.</p> <p>The removal of reference to Swansea Road makes no difference to the outcome of implementation of the policy. Therefore it is considered that</p>



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>currently a very good level of convenience goods expenditure retention within Merthyr Tydfil, taking into account the LDP's strategy for enhanced growth, an additional 789 sq. metres (net) of convenience retail floorspace is likely to be required by 2021.</p> <p>4.20.2 It is envisaged that the requirement for additional convenience floorspace is sufficiently small to be met through the provision of one small supermarket, or a range of local provision, or a store extension in accord with the sequential test and, consequently, the LDP does not make specific allocations in this regard.</p> <p><del>4.20.2 In terms of comparison goods, a leakage of expenditure to other centres has been identified, in particular, to Cardiff. Whilst occasional visits the Capital are</del></p>	<p>neighbouring authority areas.</p> <p>The Council considers that allowing for a constant retention rate is the most appropriate approach at the time of writing, resulting in a requirement for 660 sq metres (net) of additional comparison floorspace. However, this stance should be reviewed during the course of the Plan period taking account of potentially improving conditions for investment.</p> <p>This being the case, overall requirement is sufficiently small to be met by a range of local provision or a store extension in accord with the sequential test. Notwithstanding, a degree of flexibility can be provided by the allocation of the bus station site which comprises the existing, consented area (already taken into account as a retail commitment) plus the remainder of the bus station itself which has</p>	no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>accepted as an integral part of a regional retail scenario, the Council considers it imperative that a proportion of this annual net outflow is clawed back if Merthyr Tydfil is to become a more self-sufficient and sustainable County Borough, especially as overall comparison expenditure is likely to remain strong. Consequently, up to 9,827 sq. metres (net) of additional comparison retail floorspace will be required by 2021.</del></p> <p><del>4.20.4</del> In terms of the requirement for additional comparison floorspace, it is intended that this be achieved by:-</p> <ul style="list-style-type: none"> <li><del>• the intensification of existing uses in Merthyr Tydfil Town Centre (see justification for Policy AS19)</del></li> <li><del>• the implementation of existing permissions at St. Tydfil's Square Shopping Centre (Merthyr Tydfil Central Bus Station) and land north-west of the town centre (Swansea</del></li> </ul>	<p>become outdated as a transport facility and needs to be remodelled to make a more efficient use of valuable town centre space.</p>	



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>Road), both shown as allocations on the LDP proposals map.</del></p> <p><b>Merthyr Tydfil Central Bus Station</b></p> <p><del>4.20.5— St. Tydfil's Square Shopping Centre opened in 1970 and has, since that time, exhibited positive characteristics that could justify its future expansion. An extension of the precinct is physically feasible using an area of land to the immediate north and planning consent for a combined retail and leisure scheme incorporating approximately 1463 sq. metres (net) of retail floorspace and an 8-screen cinema was granted in 2007. Whilst the consent has yet to be implemented, the LDP supports this or a similar scheme (see Para. 4.20.6 below) as a means of strengthening and diversifying the town centre's retail and leisure offer.</del></p> <p><del>4.20.6— An alternative development scenario</del></p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>that also utilises the above land, but additionally includes the adjacent bus station, could increase the overall retail floorspace at this location to around 4,000 sq. metres (gross). This option would entail remodelling the existing central bus station in order to help deliver public transport improvements as set out in Policy AS12.</del></p> <p><del>4.20.7</del> The retail allocation on the LDP proposals map reflects the larger of the two above options.</p> <p><del>SWANSEA ROAD</del></p> <p><del>4.20.8</del> The site, also known as Trago Mills, is situated to the immediate west of the A470(T) and approximately 1 kilometre to the north-west of Merthyr Tydfil Town Centre. It is highly accessible from the strategic highway network and acts as an important gateway to the town.</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p><del>4.20.9—Measuring approximately 35.0 hectares in total, the site has been reclaimed to include several distinct development plateaux. It is intended that approximately 18.5 hectares will accommodate leisure opportunities as set out in Policy AS16, with the remaining 16.5 hectares being given over to 13,935 sq. metres (net) of non-food retail floorspace.</del></p> <p><del>4.20.10 The LDP land use allocations in this area reflect the previous granting of outline planning consent by the Council. Though basic infrastructure works have been carried out following local land reclamation, the main components of the scheme remain to be realised.</del></p> <p>4.20.3 In terms of comparison goods, and taking into account existing retail commitments through planning consents granted on land adjacent to Merthyr Tydfil Central Bus Station</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>and land at Swansea Road, there is no requirement for additional floorspace over the plan period. This takes into account the fact that occasional visits to other centres, principally Cardiff, will remain an integral part of a regional retail scenario.</p> <p>4.20.4 Whilst the Council is accepting of the above, it also considers that during the lifetime of the Plan, it will be desirable to retain a greater proportion of net out-flowing expenditure. This being the case, the <i>Retail and Commercial Leisure Capacity Study</i> concludes that between 660 and 4000 sq metres (net) of new retail floorspace will be required for comparison goods by 2021, depending on which retention scenario the LDP sets out to follow.</p> <p>4.20.5 The Council considers that a constant retention rate is the most appropriate approach at the time of writing (resulting in a requirement for 660 sq metres) but that this stance should be reviewed during the course of the Plan period taking</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>account of likely improving conditions for investment, particularly in the town centre, where the Council's intention is for significant redevelopment over the longer term as mentioned at Para 4.19.5.</p> <p>4.20.6 In terms of specific allocation in the LDP, the overall requirement is sufficiently small to be met by a range of local provision or a store extension in accord with the sequential test. However, the Council recognises that opportunities also exist for floorspace to be provided at the site of the Hollies Health Centre upon cessation of activities during the mid-part of the plan period, and also at Merthyr Tydfil Central Bus Station in addition to the floorspace already granted planning permission.</p> <p>4.20.7 The latter option would entail the use of the bus station itself and could increase the overall retail floorspace at this location by around 3,000 sq. metres (gross) to 5000 sq. metres (gross). It would entail remodelling the existing, outdated facility in order to assist in the delivery of public</p>		



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>transport improvements as set out in Policy AS12, and would help to realise one of the key aspirations for the area set out in the <i>Merthyr Tydfil Town Centre Strategic Review (2009)</i>.</p> <p>4.20.8 Policy AS20 above, and the retail allocation on the LDP proposals map, reflect the preference for bus station redevelopment.</p> <p>Related strategic objectives: SO1; SO3; SO7; SO8; SO9</p>		
<b>New Paragraphs: Unstable Land</b>				
Proforma 33	Paragraphs 3.19.1 – 3.19.2	<p><b>Unstable Land</b></p> <p>3.19.1 Areas of potentially unstable land are known to exist in certain parts of the County Borough as a result of historical coal mining activity. Such areas of land lie both inside and outside the settlement boundary and are identified as Coal Mining Referral Areas on the LDP Constraints Map.</p>	The Council was requested to further consider the need to address land stability. To this end the Council has inserted a new paragraph to make clear that National development control policy will be applied to proposed developments affected by unstable land.	The new paragraphs includes direct reference to paragraphs 13.9.1 and 13.9.2 of Planning Policy Wales. This strengthens the section on unstable land in the LDP in terms of sustainability and as such no further SA is required.



REF. NUMBER	POLICY/ PARAGRAPH/ OTHER	PROPOSED CHANGE	JUSTIFICATION	SA/SEA SCREENING
		<p>The Coal Mining Referral Areas are not necessarily exhaustive, and the responsibility for determining the extent and effects of such constraints lie with the developer. Where development is proposed in these areas, the developer should consult with The Coal Authority.</p> <p>3.19.2 Development proposals on land affected by instability will be assessed against development control policy within paragraphs 13.9.1 and 13.9.2 of Planning Policy Wales (2010).</p>		

## Appendix 2: Sustainability Appraisal of new Policy AS24 and new Policy TB13

### Key:

DG	Development actively encouraged as it would resolve an existing sustainability problem
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LG	No sustainability constraints and development acceptable
B	Neutral or unknown effect
Y	Potential sustainability issues; mitigation and /or negotiation possible
O	Problematical and improbable because of known sustainability issues; mitigation or negotiation difficult and /or expensive
R	Absolute sustainability constraints to development

**Policy AS24: Employment site protection**

In order to protect the employment function of the County Borough's business and employment sites, development proposals will be restricted as follows:-

At Rhydyar Business Park, development will only be permitted if:

It falls within use class B1; or

It provides an ancillary facility or service to the primary employment use.

At Pengarnddu, Pant Industrial Estate, Goatmill Road, Willows/Dragon Park, Triangle Business Park and Merthyr Tydfil Industrial Park, development will only be permitted if:

It is within use classes B1, B2 or B8; or

It is an appropriate Sui Generis use; or

It provides an ancillary facility or service to the primary employment use, or

It is an acceptable commercial service unrelated to class B uses.

<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>



SA Objective	Assessment of Effects		Evidence and Reference (where available)	Proposed and Potential Mitigation
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
<b>1 HOUSING</b>  <i>TOPIC AREA IN SEA DIRECTIVE:</i>  <i>POPULATION AND HUMAN HEALTH</i>	No direct impact as the housing allocation requirement has been met in the LDP.	B		
<b>2 CULTURE AND HERITAGE</b>  <i>TOPIC AREA IN SEA DIRECTIVE: CULTURAL HERITAGE</i>	Retention of employment uses on appropriate sites will assist in protecting the historic value of the town.	LG		
<b>3 COMMUNITIES</b>  <i>TOPIC AREA IN SEA DIRECTIVE: POPULATION</i>	Retention of employment premises will help meet the requirement for employment opportunities in accessible locations. Positive effect.	LG		



SA Objective	Assessment of Effects		Evidence and Reference (where available)	Proposed and Potential Mitigation
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
<b>4 HEALTH</b>  <i>TOPIC AREA IN SEA DIRECTIVE: HUMAN HEALTH</i>	Protection of existing industrial sites which are appropriate for uses which may have noise, traffic or odour pollution issues will protect residential areas from uneighbourly uses. This will have positive impacts for health as does the availability of a wide range of employment opportunities.	LG		
<b>5 ECONOMY AND EMPLOYMENT</b>  <i>TOPIC AREA IN SEA DIRECTIVE: POPULATION, MATERIAL ASSETS AND HEALTH</i>	The policy caters for a wide range of employment uses from B1 – B8 and the policy justification explains where SUI Generis uses can be accommodated.  Protecting land which is already in employment/economic use increases the range of employment opportunities available.  Positive effect in the short and long term.	LG		
<b>6 TRANSPORT</b>	Protecting land with adequate infrastructure to serve the needs of industrial processes and in	LG		

<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>
<i>TOPIC AREA IN SEA DIRECTIVE: POPULATION AND CLIMATIC FACTORS</i>	appropriate locations will reduce the potential for such uses in locations which could cause pollution or congestion. Positive effects.		
<b>7 BUILT ENVIRONMENT</b>  <i>TOPIC AREA IN SEA DIRECTIVE: MATERIAL ASSETS</i>	Protection of existing sites for employment use will prevent unsuitable development in locations which could have adverse impacts on the built environment.  Positive effect.	LG	
<b>8 LANDSCAPE</b>  <i>TOPIC AREA IN SEA DIRECTIVE: LANDSCAPE</i>	Resisting residential proposals on land in employment use will protect the landscape from new industrial development which could result from a loss of existing appropriate sites. Positive effect.	LG	



SA Objective	Assessment of Effects		Evidence and Reference (where available)	Proposed and Potential Mitigation
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
<b>9 BIODIVERSITY</b>  <i>TOPIC AREA IN SEA DIRECTIVE: BIODIVERSITY, FAUNA AND FLORA</i>	Resisting residential proposals on land in employment use will protect the landscape and biodiversity from new industrial development which could result from a loss of existing appropriate sites. Positive effect.	LG		
<b>10 WATER</b>  <i>TOPIC AREA IN SEA DIRECTIVE: WATER</i>	No significant effect.	B		
<b>11 CLIMATE CHANGE</b>  <i>TOPIC AREA IN SEA DIRECTIVE: CLIMATIC FACTORS</i>	Loss of employment premises in the Borough could result in increased commuting for work. This policy, by retaining local employment potential, supports aims to reduce carbon output. Positive effect,	LG		



SA Objective	Assessment of Effects		Evidence and Reference (where available)	Proposed and Potential Mitigation
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
<b>12 ENERGY</b>  <i>TOPIC AREA IN SEA DIRECTIVE: CLIMATIC FACTORS AND AIR</i>	No significant effect. .	B		
<b>13 LAND AND SOILS</b>  <i>TOPIC AREA IN SEA DIRECTIVE: SOIL</i>	No direct impact.	B		
<b>14 Waste</b>  <i>TOPIC AREA IN SEA DIRECTIVE: WATER, SOIL, HUMAN HEALTH AND POPULATION</i>	The policy justification indicates that waste management facilities will be acceptable in the B2 locations which will enable local recycling management to take place. Positive effect.	LG		



<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>
<b>15 MINERALS</b>  <i>TOPIC AREA IN SEA DIRECTIVE: MATERIAL ASSETS</i>	No direct or indirect effect.	<div style="background-color: #000080; color: white; padding: 5px; display: inline-block;">LG</div>	
<p><b>Summary</b></p> <p>Beneficial effects are predicted for most SA objectives through the protection and retention of existing employment premises and the opportunity presented to achieve a wide range of employment opportunities within the Borough. No negative or adverse effects are identified.</p>			

**Policy TB13: Exception Sites For Affordable Housing In The Countryside**

Development proposals for the provision of affordable housing outside and adjoining settlement boundaries identified in the LDP will be permitted where it can be demonstrated that:

- The proposed development cannot be accommodated within defined settlement boundaries;
- The site does not exceed 10 dwellings or 0.5 hectares;
- The proposed development is solely for the provision of affordable housing to meet an identified local need;
- The development is compatible with other relevant plan policies and material planning considerations.

SA Objective	Assessment of Effects		
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)	Evidence and Reference (where available)	Proposed and Potential Mitigation
<p><b>1 HOUSING</b></p> <p><i>TOPIC AREA IN SEA DIRECTIVE:</i></p> <p><i>POPULATION AND HUMAN HEALTH</i></p>	<p>The policy addresses the need for rural affordable housing across the Borough due to recent substantial increases in house prices. There should be a positive, long term impact.</p>		

SA Objective	Assessment of Effects		Evidence and Reference (where available)	Proposed and Potential Mitigation
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
<b>2 CULTURE AND HERITAGE</b>  <i>TOPIC AREA IN SEA DIRECTIVE: CULTURAL HERITAGE</i>	Affordable housing can be of a high design standard and there should be no specific adverse impact on historic buildings. Care will be needed to avoid impact on the historic landscape when considering developments outside, rather than adjacent to, settlement boundaries. However the small scale of such developments will reduce their potential impact.			
<b>3 COMMUNITIES</b>  <i>TOPIC AREA IN SEA DIRECTIVE: POPULATION</i>	Will promote the retention of mixed and strong communities through the provision of housing designed to meet recognised needs. May go some way to addressing then depopulation of the Borough by creating housing opportunities for young people in rural areas. Positive short to long term impact.			
<b>4 HEALTH</b>	Should have a positive and long-term impact on health through the improvement of housing		Merthyr Tydfil has the highest proportion of	



SA Objective	Assessment of Effects		Evidence and Reference (where available)	Proposed and Potential Mitigation
	Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)			
<i>TOPIC AREA IN SEA DIRECTIVE: HUMAN HEALTH</i>	conditions and the provision of high standard affordable housing.		people with a limiting long term illness in Wales and the second highest in England and Wales. Office of National Statistics (Various Dates), Registrar General's Mid Year Population Estimates for Merthyr Tydfil	
<b>5 ECONOMY AND EMPLOYMENT</b>  <i>TOPIC AREA IN SEA DIRECTIVE: POPULATION, MATERIAL ASSETS AND HEALTH</i>	May have an indirect and positive impact on the economy through retention of a young employment base. Potential for a positive impact on the rural economy in the long-term.			
<b>6 TRANSPORT</b>	New development, especially in the countryside, inevitably increases the use of the private vehicle			



<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>
<i>TOPIC AREA IN SEA DIRECTIVE: POPULATION AND CLIMATIC FACTORS</i>	in any location or of any type or tenure. Inevitable adverse impact to some degree and dependent on the availability of public transport and alternative provision for walking and cycling.		
<b>7 BUILT ENVIRONMENT</b>  <i>TOPIC AREA IN SEA DIRECTIVE: MATERIAL ASSETS</i>	Affordable housing can be of a high design standard and there should be no specific adverse impact on the built environment.		
<b>8 LANDSCAPE</b>  <i>TOPIC AREA IN SEA DIRECTIVE: LANDSCAPE</i>	Care will be needed to avoid impact on the landscape when considering developments outside, rather than adjacent to, settlement boundaries. However the small scale of such developments will reduce their potential impact		
<b>9 BIODIVERSITY</b>	Care will be needed to avoid impact on biodiversity when considering developments		



<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>
<i>TOPIC AREA IN SEA DIRECTIVE: BIODIVERSITY, FAUNA AND FLORA</i>	outside and adjacent to settlement boundaries. However the small scale of such developments will reduce their potential impact.		
<b>10 WATER</b>  <i>TOPIC AREA IN SEA DIRECTIVE: WATER</i>	As with any other development sustainable water management should be deployed to manage increased water use and there should be no other specific impacts. Impact will be dependent on the standards required for all new housing which has now been raised to level 3 of the Code for Sustainable Homes.	■ WAG	
<b>11 CLIMATE CHANGE</b>  <i>TOPIC AREA IN SEA DIRECTIVE: CLIMATIC FACTORS</i>	Most of the climate change issues relating to housing are covered in the transport, energy, waste and water sections. Overall impact neutral because of the small scale of development anticipated.	■	
<b>12 ENERGY</b>	As part of the general level of development it will	■ WAG	



<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>
<i>TOPIC AREA IN SEA DIRECTIVE: CLIMATIC FACTORS AND AIR</i>	inevitably involve increased carbon emissions both through embodied energy and future running of the dwellings. Impact will be dependent on the standards required for all new housing which has now been brought up to level 3 of the Code for Sustainable Homes.		
<b>13 LAND AND SOILS</b>  <i>TOPIC AREA IN SEA DIRECTIVE: SOIL</i>	The level of development of affordable homes in the countryside will be small scale and will have no significant effect on this objective.		
<b>14 Waste</b>  <i>TOPIC AREA IN SEA DIRECTIVE: WATER, SOIL, HUMAN HEALTH AND POPULATION</i>	Developments adjacent to settlement boundaries should be able to benefit from existing waste and recycling arrangements; however this may be a concern if developments are allowed too far outside the boundaries. However this is an issue which is covered at level 3 of the Code for Sustainable Homes.		
<b>15 MINERALS</b>	Depending on construction techniques there will be an increased demand for minerals but this is		



<b>Assessment of Effects</b>			
<b>SA Objective</b>	<b>Nature of the predicted sustainability effect (positive/negative, short/medium/long term, cumulative, scale, reversibility, likelihood)</b>	<b>Evidence and Reference (where available)</b>	<b>Proposed and Potential Mitigation</b>
<i>TOPIC AREA IN SEA DIRECTIVE: MATERIAL ASSETS</i>	part of the overall housing need and not specific to the provision of affordable housing.		
<p><b>Summary</b></p> <p>Beneficial effects are predicted for SA objectives relating to housing, health and communities with potential indirect benefits for employment objectives. Whilst potential for some adverse effects has been identified in relation to transport, landscape and biodiversity objectives, the anticipated level of development will be small and some mitigation will be possible. Therefore these effects are not considered to be significant and the overall impact to be neutral.</p>			

