



# **Cynllun Datblygu Lleol Amnewid (2016 - 2031)** **Replacement Local Development Plan (2016 - 2031)**

## Review Report February 2026

Miss J Jones  
*Cyfarwyddwr Gwasanaethau Cymdogaeth*  
Director of Neighbourhood Services  
*Cyngor Bwrdeistref Sirol Merthyr Tudful*  
Merthyr Tydfil County Borough Council  
*Uned 5 – Unit 5*  
*Parc Fusnes Triongl – Triangle Business Park*  
Pentrebach  
*Merthyr Tudful – Merthyr Tydfil*  
CF48 4TQ



**Cyngor Bwrdeistref Sirol**  
**MERTHYR TUDFUL**

**MERTHYR TYDFIL**  
County Borough Council



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# Review Report

## Section 1 – Introduction

1.0 The purpose of this Review Report is to consider the progress and implementation of the *Merthyr Tydfil County Borough Council First Replacement Local Development Plan, 2016-2031*, prior to drawing conclusions and presenting recommendations.

1.1 This report will provide consideration of:

- The LDP Strategy and associated Vision and Objectives.
- Contextual changes in the national, regional and local policy, guidance and legislative frameworks, alongside any significant changes to the LDP Evidence Base.
- The LDP's policy framework inclusive of allocated sites.
- All five Annual Monitoring Reports (AMRs) produced since the Plan's adoption in January 2020.

1.2 The structure of the report is, as follows:

**Section 2 – Issues Considered in the LDP Review.** This section provides a summary of the main findings of the five AMRs published post LDP adoption. It also assesses the key changes to the policy, guidance and legislative frameworks at a national, regional and local level, which are important considerations of the LDP review process.

**Section 3 – Joint Working Opportunities.** The section explores opportunities for joint working in relation to the production of the LDP and its associated Evidence Base.

**Section 4 – Review of the Vision and Objectives.** This section considers the Vision and Objectives of the adopted LDP and assesses the potential changes required, as part of the review process.

**Section 5 – LDP Strategy.** The section involves an assessment of the LDP Strategy. It looks at the supporting data, alongside the primary drivers of the Strategy and highlights where change is required.

**Section 6 – LDP Policy Review.** This section provides a review of the policy areas within the LDP, illustrating where revisions to national policy and the legislative framework will necessitate change at a local level. It also assesses the efficacy of the policies through analysis of the most recent AMR data.

**Section 7 – Evidence Base Requirements.** The section sets out where updates or new studies are required to support the review of the LDP.

**Section 8 – Review of Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA).** The section discusses the SA/SEA and HRA procedure. It looks at the potential of undertaking an Integrated Sustainability Appraisal (ISA) incorporating the Well-being of Future Generations Act, Equalities Act, Welsh Language, Health Impact Assessment and, where appropriate, the Environment Act. The HRA element explores the changes to legislation following the UK's exit from the European Union.

**Section 9 – Conclusions.** This section provides conclusions on the appropriate form of plan revision.

### **The Need for Review**

- 1.3 Section 69 of the *Planning and Compulsory Purchase Act, 2004* requires all Local Planning Authorities (LPAs) to undertake a review of their adopted Local Development Plan (LDP) and report the findings to the Welsh Government via a Review Report. Beyond four years, the Plan's Evidence Base is considered dated, consequently Regulation 41 of the *Town and Country Planning (Local Development Plan) (Wales) (Amendment) Regulations 2015*, mandates a review. The Manual is clear that up-to-date evidence is key to ensuring *effective and consistent planning decisions, supporting the objectives of a plan-led system.* (Welsh Government, 2020, p198).
- 1.4 The principal purpose of the Review Report is to establish an appropriate procedural route for the preparation of a replacement LDP. There are two avenues available when considering the options for review. The first is a full review, utilising the same procedure undertaken for the adopted LDP, resulting in a replacement plan. The second option is known as a short form review (SFR), whereby changes will not affect the strategy or go to the heart of the plan. The SFR procedure is very limited in its scope and focus and thus would likely not be an appropriate mechanism for addressing the issues identified in the AMR.
- 1.5 The outcomes of the AMR indicate that a full review of the plan is likely to be the most appropriate method, given the extent of changes required. This approach will be particularly pertinent for ameliorating those issues identified with employment and the supply of housing. A full conclusion is available at Section 9 of this report.

### **Current Adopted LDP**

- 1.6 The *Merthyr Tydfil County Borough Council, First Replacement Local Development Plan*, was adopted in January 2020 and is the Council's land use planning document for the period 2016-2031. The document presents the

Council's Aims, Objectives and Vision, alongside the Spatial Strategy and planning policy framework, integral to its delivery.

- 1.7 In line with statutory requirements, the First Replacement LDP has been monitored on an annual basis, principally via the production of five Annual Monitoring Reports (AMRs). The most recent of which was published in October 2025 and covers the period from the 1<sup>st</sup> of April 2024 to the 31<sup>st</sup> of March 2025.
- 1.8 The AMRs assess the extent to which the LDP's Strategy, policies and allocations are being delivered, by measuring their performance against specific targets and indicators. Furthermore, it encompasses annual survey data, updated Evidence Base documents and those contextual changes that could potentially affect the Plan's delivery.

## Section 2 – Issues Considered in the LDP Review

### Key Findings of the Annual Monitoring Reports

2.0 National planning guidance, as contained with the *Development Plan Manual* (ed. 3) (the Manual), states that the findings of the Annual Monitoring Reports (AMRs) should inform the review process.

2.1 The AMRs produced by Merthyr Tydfil County Borough Council (MTCBC) provide an insight into effectiveness of the LDPs implementation. Some of the key findings of the AMR are presented below.

- i. 827 dwellings have been built in the County Borough, since the beginning of the plan period (2016)
- ii. Of the 827 dwellings complete; 602 were market dwellings, whilst 225 were affordable.
- iii. 2016-2017 saw the highest number of dwelling completions at 173 units, with 2018-2019 providing the lowest figure of 44 dwellings for that year.
- iv. To date, 533 dwellings have been built within the Primary Growth Area whilst 294 have been erected in the Other Growth Area.
- v. The short and long-term need for Gypsy and Traveller accommodation is being met.
- vi. 0.6ha of allocated employment land has been developed.
- vii. A total of 243 Class B jobs have been created since the beginning of the plan period.
- viii. Merthyr Tydfil Town Centre had a vacancy rate of 16% during the latest survey, which was below the Welsh average vacancy rate of 16.9%.
- ix. The percentage of retail units in the Primary Shopping Area (PSA) has remained above 75% (77% in 2024-2025).

2.2 The evidence collated through the AMR process highlights that many key aspects of the Plan have been implemented successfully. Unfortunately, certain key elements are not progressing towards the stipulated targets, as anticipated. The latest AMR identifies the following areas as being of concern:

- Overall number of housing completions.
- Number of net additional new general market dwellings built in the Plan area.

- Total number of housing units permitted on allocated sites, as a percentage of all housing completions.
- Number of completions in the Primary Growth Area.
- Number of completions in the Other Growth Area.
- Employment land development (ha) on allocated sites, as a percentage of all employment allocations.
- Minimum number of additional jobs delivered.

2.3 A summary of the LDPs achievements can be found at Appendix A of this report.

### **Contextual Changes**

- 2.4 During the preparation of the Local Development Plan (LDP), the Plan must be in conformity with the latest planning guidance, policy and legislation, which governs the planning process. Once the LDP is adopted, subsequent changes to policy, guidance and legislation cannot be incorporated into the Plan's written statement. Consequently, the review process is fundamental to assessing whether identified changes are significant enough to warrant a full review or short-form revision of the Plan.
- 2.5 The following are considered the most significant changes to the policy, guidance and legislative framework, since the First Replacement LDP's adoption in January 2020.

#### **National:**

##### 2.6 Future Wales - the National Plan 2040:

This major, new national planning policy document was published in February 2021 and forms the national tier of the Development Plan framework. It sets the strategic direction for development in Wales up to 2040 and addresses key national priorities, through the planning system. This national framework will be built on by the Strategic Development Plans (SDP) at a regional level and LDPs or LDP 'Lites' at local authority level. SDPs and LDPs are required to be in conformity with *Future Wales* and must be kept up to date, to ensure that they and *Future Wales* work together effectively.

##### 2.7 Planning Policy Wales (PPW), Updates:

There have been two updated iterations of *Planning Policy Wales* (PPW) since the MTCBC replacement plan was adopted. PPW (ed. 11) and PPW (ed.12) have significantly altered the national framework for development plan production, since the first replacement LDP was produced.

PPW (ed.11) was published in February 2021 and featured revisions to align with *Future Wales*, in addition to reflecting the socio-economic impacts of the COVID-19 pandemic. Furthermore, it applied policy changes to housing supply monitoring, affordable housing-led sites and development quality standards, local energy planning, transport and active travel.

The latest iteration of PPW, (ed. 12), was published in February 2024. PPW 12 strengthens measures to address Wales's nature and climate emergencies, with key updates focused on biodiversity, Green Infrastructure (GI), and natural place-making. The principal changes involved:

- **Green Infrastructure Statement:** All planning applications should now include a proportionate GI Statement, explaining how Green Infrastructure has been incorporated into the proposal and how the Step-wise Approach has been applied.
- **Net Benefit for Biodiversity:** Applicants must demonstrate a clear net benefit for biodiversity, not just mitigate against the existing value and condition. This involves ensuring that a site is in a significantly better state for biodiversity than it was pre-development.
- **Stronger Protection for SSSIs:** Development affecting SSSIs has been controlled more stringently, with most development considered unacceptable, apart from minor works required for site management purposes.
- **Trees & Woodlands Requirements:** National policy requires that any development involving the removal of trees, replace at a ratio of 1:3. Therefore, for every tree removed, at least three should replace it. Emphasis is placed on planting the appropriate tree in the correct location.
- **Revised Chapter 6:** Chapter 6 has been renewed to embed nature recovery, Green Infrastructure and ecosystem resilience into the heart of place-making policy.
- **PPW 12 introduces requirements for planning authorities to consider localised issues, such as short-term lets and the prevalence of second homes.**

These updates need to be reflected in the future SDPs and replacement Local Development Plans to ensure conformity.

## 2.8 Development Plans Manual, Edition 3 (March 2020):

The *Development Plans Manual (ed. 3)* provides updated guidance for practitioners involved in the preparation, implementation, monitoring and revision of development plans. It is to be read in conjunction with PPW and other pertinent, national legislation, guidance and policy documents.

The Manual strengthens the regional tier of planning through the introduction of Strategic Development Plans (SDP) and regional-level, longer-term development strategies. Furthermore, it introduces the concept of LDP ‘Lites’; a shorter, more focused plan compiled by LPAs, following adoption of the SDP. The Manual also incorporates requirements from the *Planning (Wales) Act, 2015*, the *Well-being of Future Generations (Wales) Act, 2015* and requires more rigorous conformity with *Future Wales*.

## 2.9 Changes to Technical Advice Notes (TAN):

Revocation of TAN 1: *Joint Housing Land Availability Studies* (March 2020) – The TAN was revoked in March 2020, which removed the requirement to evidence a five-year housing land supply. The policy requirement was removed from both PPW and the *Development Plans Manual (ed.3)*.

Revocation of TAN 8: *Planning for Renewable Energy* (February 2021) – The revocation of TAN 8 resulted in the removal of Strategic Search Areas for planned large-scale wind energy developments. The introduction of *Future Wales* instead identified pre-assessed areas deemed to be most suitable for future wind energy proposals.

TAN 11: *Air Quality, Noise and Soundscape* – The revised TAN 11 was consulted on in 2022 and is currently being reviewed. The Welsh Government considered an update necessary to reflect the emphasis on soundscapes and ensure compliance with PPW, *Future Wales*, *The Noise and Soundscape Action Plan for Wales* and the *Clean Air Plan for Wales*. TAN 11 was published in 1997 and currently only covers noise.

TAN 14: *Coastal Planning* – The TAN, published in 1998, is now cancelled having been subsumed into TAN 15 (March 2025).

TAN 15: *Development, Flooding and Coastal Erosion* – The TAN, which came into force on the 31<sup>st</sup> of March 2025, supplements the policies within *Future Wales* and *Planning Policy Wales* in relation to flooding and coastal erosion. The introduction of the new TAN 15 replaces both TAN 14, published in 1998 and its predecessor TAN 15, published in 2004. Acknowledging that Wales’s climate is likely to become wetter in the future, the TAN aims to ensure that communities, infrastructure and the natural environment become more resilient, as flooding events increase. Furthermore, the TAN urges a more proactive approach to risk management, integrating flood mapping and climate science with planning policy. Moreover, the former Development Advice Maps have been replaced with an interactive spatial map, known as *The Flood Map for Planning*, hosted and managed by Natural Resources Wales (NRW).

TAN 19: *Telecommunications* (2002) – The Tan was revoked in February 2024. Current guidance on telecommunications planning can be found in *Future Wales*, *Planning Policy Wales*, and the *Code of Best Practice on Mobile Phone Network Development for Wales*.

## 2.10 LDP End Dates Letter (September 2020):

The letter produced by the Welsh Minister clarified the following:

Those plans adopted after the 04<sup>th</sup> of January 2016 cease to be the adopted development plan and expire on the date specified within the plan. Where a month is not specified, the plan ceases to be effective from the last day of the stipulated year. Consequently, the *Merthyr Tydfil Replacement LDP* will cease to apply after the 31<sup>st</sup> of December 2031. Conversely, those plans that were adopted prior to 04<sup>th</sup> of January 2016 will apply until a replacement plan is adopted.

## 2.11 Building Better Places, The Planning System Delivering Resilient and Brighter Futures – Place-making and the COVID-19 Recovery:

The plan, published in July 2020, sets out the Welsh Government's planning policy priorities for the post COVID-19 recovery. It emphasises the need for good, high-quality developments that are guided by the place-making principles. Furthermore, it identifies key issues, which bring individual policy areas together ensuring an effective, holistic approach to recovery. The Replacement LDP process provides the opportunity to respond to the priorities and issues identified nationally.

## 2.12 Planning and the Post COVID-19 Recovery:

The letter, produced by the Welsh Minister and sent to Local Planning Authorities (LPAs) in July 2020, required LPAs to reflect on the impact of the pandemic within their administrative areas. It invited them to consider the consequences for those LDPs under review or in the process of being implemented, particularly in relation to the Evidence Base. The opportunity for Merthyr Tydfil to embark upon a second Replacement LDP will enable a considered response regarding the impact of the pandemic on all elements of the Plan.

## 2.13 Socio-economic Duty:

The duty, set within the Equality Act 2010, came into force in Wales on 31<sup>st</sup> March 2021. It encourages better decision-making and aims to reduce inequalities resulting from socio-economic disadvantage. The duty requires relevant public bodies to consider how they would reduce inequalities when taking strategic decisions or engaging in policy formulation.

## 2.14 Securing Biodiversity Improvements (October 2019):

This Chief Planning Officer letter draws attention to the *Environment (Wales) Act, 2016* Section 6 duty, which provides the need for LPAs to *seek to maintain and enhance biodiversity in the exercise of their functions*. It continues by stating that LPAs should be *proactive and embed appropriate policies into LDPs to protect against biodiversity loss and secure enhancement*.

## 2.15 The Second State of Natural Resources (SoNaRR) Report (December 2020):

The *Environment (Wales) Act, 2016* requires LPAs to have regard to the SoNaRR, published by Natural Resources Wales (NRW) in December 2020. The SoNaRR provides an evidence base for LPAs when undertaking a revisions procedure. This second report builds on the evidence within the first SoNaRR, produced in 2016. The newest iteration illustrates some of the key challenges, priorities and opportunities for the sustainable management of natural resources in Wales.

## 2.16 Llwybr Newydd - The Wales Transport Strategy (2021):

The strategy sets out the Welsh Government's vision for how the transport system can help deliver the stipulated five-year and twenty-year priorities for Wales. *Llwybr Newydd* is comprised of nine component plans, explaining how each will be delivered for different transport modes and sectors. The strategy requires governments, local authorities, transport providers and colleagues in other policy areas, to work together to ensure that transport contributes to the current and future well-being of Wales. This national strategy sets the framework for the two tiers of transport plans in Wales: The *National Transport Finance Plan* and *Joint Local Transport Plans*.

## 2.17 Active Travel Act Guidance (2021):

Part 1 of the guidance provides an outline summary of the aims, processes and key considerations associated with the duties of the *Active Travel (Wales) Act, 2013*. Part 2 provides detailed technical advice on how infrastructure should be planned and designed. This guidance explains that Active Travel Network Maps should be used to inform the preparation and review of LDPs, with reference to the requirement in PPW for these maps to inform site allocations.

## 2.18 Manual for Streets 2 (Urban and Rural Streets), (May 2019):

The new document expands upon the *Manual for Streets* to include urban and rural situations, filling the gaps in advice between *Manual for Streets* and *The Standards for Trunk Roads*. *Manual for Streets (Residential Streets)* sets out how to design, construct, adopt and maintain new and existing residential streets.

## 2.19 Electric Vehicle Charging Strategy for Wales (March 2021):

The strategy sets out the Welsh Government's vision for electric vehicle charging in Wales. Its aims include that "*by 2025 all users of electric cars and vans in Wales are confident that they can access electric vehicle charging infrastructure when and where they need it.*" The strategy indicates that Wales currently has one of the lowest levels of electric vehicle ownership in the UK and the strategy aims to increase public confidence in the availability of charging infrastructure.

## 2.20 Clean Air Plan for Wales (August 2020):

This Plan aims to improve air quality and reduce the impacts of air pollution on human health, biodiversity, the natural environment and the economy. The Plan supports the delivery of commitments under *Prosperity for All: The Welsh Government National Strategy*. In particular, the strategy aims to reduce emissions, deliver vital improvements to air quality and to support healthier communities and better environments. In December 2020, the Welsh Government also published a report on the impact of COVID-19 on air quality.

## 2.21 Schedule 3 of the Flood and Water Management Act (2010) – Disposal of surface water through Sustainable Drainage Systems (SuDS) (January 2019):

The SuDS legislation has proved significant for the development industry and LPAs. The impact on LPAs has been substantial given that they have acquired the role of the Sustainable Drainage Approval Body (SAB) processing all applicable applications. The process provides a framework for the approval and adoption of surface water systems, serving new developments. The Welsh Government introduced statutory instruments to implement this requirement, mandating that from the 7<sup>th</sup> of January 2019, all new developments of more than one dwelling (or where the construction area is 100m<sup>2</sup> or greater) to dispose of surface water through SuDS.

## 2.22 Increasing The Supply of Affordable Homes Through Planning (July 2019):

The Welsh Government issued guidance to LPAs re-iterating the importance of addressing the affordable housing need, when reviewing LDPs. It highlights the importance of making provision for affordable housing-led sites, which must include at least 50% affordable housing, in line with the definition contained within TAN 2. In the first instance, affordable housing-led sites should make use of public land. Where public land is unavailable, privately owned land may be identified. The guidance is clear that sites for affordable housing-led development should be in no way inferior to sites promoted for market housing

## 2.23 Welsh Development Quality Requirements (WDQR 2021), Creating Beautiful Homes and Places:

This Welsh Government publication sets out that all affordable housing, including that provided through planning obligations and conditions, must meet the Welsh Government's development quality standards (DQR). The Welsh Government also harbour an ambition for private developers to adopt these standards by 2025. The new standards promote good design and generous space, so people live well within their homes. This aims to boost well-being and keep communities together, whilst simultaneously responding to the changing needs of residents.

## 2.24 Undertaking Local Housing Market Assessments Guidance:

In March 2022, the Welsh Government published Local Housing Market Assessment (LHMA) guidance, inclusive of a new methodology. The guidance is to be used as the basis for calculating housing need in Wales. As such, all

new LHMA contained within the LDP Evidence Base should be based on the outputs of the new methodology.

#### 2.25 A Healthier Wales (2021):

The plan sets out the Welsh Government's national plan for health and social care, to drive the changes needed to the health and social care system, so that it can meet the needs of current and future generations in Wales.

#### 2.26 Health Impact Assessment (Wales) Regulations 2025:

The Regulations introduce a legal requirement for specified public bodies in Wales to carry out a Health Impact Assessment (HIA) when making strategic decisions about how they exercise their functions. The Regulations were introduced on the 19<sup>th</sup> of November 2025 and are anticipated to come into force on the 6<sup>th</sup> of April 2027.

A HIA is defined as an assessment of the likely short and long-term impacts of a proposed action or decision on the physical and mental health of people in Wales. Public bodies listed under the *Public Health (Wales) Act 2017* must consider health risks, benefits and inequalities, prior to publishing an assessment to support transparency and informed decision-making.

#### 2.27 Net Zero Wales Carbon Budget (2021-2025):

This is the second emissions reduction plan for Carbon Budget 2 (2021-2025). It sets the foundations to make Wales net-zero by 2050. Additionally, the plan aims for an average of 37% reduction in emissions, compared with the 1990/1995 baseline, as well as accelerating renewable energy development, electric vehicle adoption and increasing building insulation.

#### 2.28 Beyond Recycling (March 2021) Strategy:

The strategy, published in March 2021, aims to ensure that Wales has a circular economy. The strategy aims for zero waste and net-zero emissions by 2050. To achieve this, there will be a continued focus on: ensuring that resources remain in use, preventing waste, encouraging repair and reuse where possible and introducing a ban on single use plastics and other items, to drive a green economy.

#### 2.29 Strategic Assessment for the future need for energy from waste capacity in the three economic regions of Wales (March 2021):

This confirms the moratorium on any future large-scale energy from waste developments of an installed capacity greater than 10MW. Proposals of between 10MW and 350MW will be determined by the Welsh Ministers alone. The assessment also updates and replaces the residual waste arisings estimates and forecast scenarios contained within the 2012 *Collections Infrastructure and Markets Sector Plan*, which *TAN 21: Waste* advises should be used in assessing

the level of need for energy from waste facilities and the extent of any capacity gap.

### 2.30 Noise and Soundscape Action Plan (2018-2023):

This outlines the Welsh public sector's strategic policy direction in relation to noise and soundscape management for the next five-years. It has a broader focus than just reducing noise levels alone, recognising the need to create appropriate soundscapes, meaning the appropriate acoustic environment in the correct location.

### 2.31 Infrastructure (Wales) Act (2024):

The Act streamlines the process for developing major infrastructure projects by establishing a single infrastructure consenting process for specified types of Significant Infrastructure Projects (SIPs) in Wales. SIPs are determined by the Welsh Ministers who issue an Infrastructure Consent Order (ICO) for approved proposals. Planning and Environment Decisions Wales (PEDW) handle the examination process on behalf of the Welsh Ministers.

### 2.32 The Historic Environment (Wales) Act 2023:

The consolidated legislation came into force on 4<sup>th</sup> of November 2024 and has repealed the following legislation in Wales:

- *The Historic Buildings and Monuments Act, 1953*
- *The Ancient Monuments and Archaeological Areas Act, 1979*
- *The Planning (Listed Buildings and Conservation Areas) Act, 1990*
- *The Historic Environment (Wales) Act, 2016*

*The Historic Environment (Wales) Act 2023* is concerned with the effective protection of the historic environment, although it does not change the way in which it is managed. The aim of the Act is to preserve Wales's historic environment and assets, to ensure that they contribute to the well-being of the country and its people.

### 2.33 Climate Adaptation Strategy for Wales (2024):

The Climate Adaptation Strategy for Wales outlines the national approach for adapting to the impacts of climate change, building resilience and ensuring a sustainable future for people, the economy and the environment. The strategy aims to provide a framework for addressing the impacts of climate change, mitigating against the risks posed and aligning with Wales's broader climate goals, inclusive of achieving net-zero emissions by 2050.

### 2.34 Natural Resources Wales (NRW) Phosphate Targets:

In January 2021, NRW introduced tougher new targets and guidance for phosphate pollution in riverine Special Areas of Conservation (SAC's) across Wales. As a result of these targets, it has become necessary to identify ways to ensure that new residential developments do not increase the nutrient load on SAC's, following discharge from sewage treatment networks. There are no affected riverine SACs within Merthyr Tydfil County Borough however the Replacement LDP will need to be aware of the situation within neighbouring authorities.

### 2.35 Natural Resources Wales – South Central Area Statement:

The NRW South Central Statement was published in March 2020 and subsequently revised in December 2024. The statement attempts to bridge the gap between the urban and natural environments, driven by five key themes to improve well-being, sustainability and resilience. The statement addresses the legacy of the area's industrial past, in addition to climate change, habitat degradation and healthier communities. The key themes for the area include:

- Building resilient ecosystems.
- Connecting people with nature.
- Working with water.
- Improving health.
- Improving air quality.

The statement facilitates the sustainable management of natural resources by fostering partnerships to deliver the identified goals.

### 2.36 Town and Country Planning (Strategic Development Plan) (Wales) Regulations 2021:

The Regulations came into force on 28<sup>th</sup> of February 2022 and set out the procedural requirements for the preparation of Strategic Development Plans (SDPs), which will govern the regional tier of planning.

## **Regional:**

### 2.37 Cardiff Capital Region City Deal:

This collaborative initiative aims to enhancing regional growth and sustainability, which involves a £1.2 billion investment fund, supported by the UK Government and the Welsh Government. The deal focuses on unlocking investment to build on the region's strengths, including its high skill base and universities to accelerate economic growth and productivity. Over its twenty-year lifetime, the

deal aims to deliver 25,000 new jobs and generate an additional £4 billion of private sector investment. The South Wales Metro is a key component of the deal, transforming rail and bus services to improve transport connectivity across the region.

#### 2.38 The Cardiff Capital Region Regional Transport Plan (RTP) 2025:

The Cardiff Capital Region RTP creates a competitive, connected, and resilient region. It focuses on establishing an efficient, affordable, low-carbon transport network that enhances quality of life, fosters shared prosperity and supports a carbon-neutral region. The plan emphasises the importance of active travel funding and aims to allocate it proportionately, according to the population of each local authority in the region.

#### 2.39 Cardiff Capital Region Energy Strategy (2021):

The strategy sets a clear pathway for the region to transition toward a carbon-neutral economy by 2035. This will be achieved by using clean energy to drive economic regeneration and environmental stewardship. The strategy outlines five core priorities, these being:

- Improving energy efficiency and low-carbon heat across homes and businesses.
- Enhancing electricity systems and flexibility, including storage and grid upgrades.
- Decarbonising transport by accelerating electric vehicle uptake and reducing private car use.
- Growing business and jobs through clean-energy innovation.
- Coordinated regional planning and governance to ensure consistent delivery.

The CCR modelling shows the need to cut regional energy-related emissions by 55% by 2035, to remain on track for net-zero by 2050. Key interventions include retrofitting tens of thousands of homes, installing 140,000 heat pumps, shifting 64% of vehicles to electric and expanding renewable energy, particularly onshore wind and solar, to meet around half of the region's total energy needs. The strategy emphasises that this transition will also support economic recovery, strengthen local supply chains, and align with Wales's wider sustainability duties under the *Well-being of Future Generations Act*.

#### 2.40 Corporate Joint Committees and the South-East Wales Strategic Development Plan:

*Future Wales* identifies four planning regions in Wales, requiring that each prepare a Strategic Development Plan (SDP), forming a regional tier of development plan. Matters relating to housing and economic growth, as well as digital connectivity and transport accessibility, should be co-ordinated and

planned across the entire region, via the SDP. Merthyr Tydfil is located within the South-East Wales region.

Over the past year, preparatory work has been undertaken on the Strategic Development Plan. Regulations were introduced in April 2021, enabling the South-East Wales Corporate Joint Committee (CJC) to exercise the strategic development planning function. The Welsh Government has also produced advisory notes in relation to the SDP regulations, inclusive of how to progress towards the new governance structure. A Delivery Agreement was consulted on in 2024-2025 and the CJC has now appointed a Head of Strategic Planning to take the SDP forward.

#### 2.41 South-East Wales Regional Economic Framework (REF):

The framework provides a shared strategic direction for achieving inclusive and sustainable economic growth across the Cardiff Capital Region. It recognises South-East Wales as Wales's most populous and economically diverse region, combining strong commercial centres with communities still affected by long-term industrial decline.

The framework sets out common regional priorities rather than prescribing delivery roles, focusing on creating alignment between the Welsh Government, the ten local authorities, businesses, academia, and the third sector. Its purpose is to tackle deep-rooted structural inequalities, support balanced prosperity and turn longstanding regional challenges into opportunities for a more dynamic and resilient economy.

Built on extensive partner engagement, the REF promotes a place-based, collaborative approach, emphasising sustainable development, long-term economic resilience, and greater coordination of regional policy and investment. It forms the foundation for future joint working under emerging regional governance models such as Corporate Joint Committees.

#### 2.42 Regional Technical Statement on Aggregates North and South Wales (Second Review), 2020:

The second revised Regional Technical Statement aims to ensure that an adequate and steady supply of aggregates can be maintained throughout Wales (and beyond, in the case of materials that are exported), considering the key objectives of sustainable supply outlined in MTAN 1.

### **Local:**

#### 2.43 Cwm Taf Morgannwg Well-being Plan 2023–2028:

The plan sets out how public sector partners across Merthyr Tydfil, Rhondda Cynon Taf and Bridgend will work together to improve sub-regional well-being, framed within the *Well-being of Future Generations (Wales) Act*. The plan is built on a comprehensive well-being assessment and extensive local engagement.

The plan's overarching theme of "A More Equal Cwm Taf Morgannwg", recognises that while the region has strengths, access to opportunities for many communities is disproportionate, affecting their well-being. It identifies two key well-being objectives:

- Healthy Local Neighbourhoods – creating inclusive, cohesive communities where people feel safe, supported, valued and able to live healthy lives.
- Sustainable and Resilient Local Neighbourhoods – helping communities understand and respond to climate risks, while valuing and managing green and blue spaces responsibly.

The plan aims to reduce inequalities, strengthen joint working across statutory partners and build a fairer future for current and future generations in the Cwm Taf Morgannwg area.

#### 2.44 Merthyr Tydfil Corporate Well-being Plan 2023–2028:

The plan outlines the Council's long-term strategy for improving the social, economic, environmental and cultural well-being of the County Borough, aligned with the *Well-being of Future Generations (Wales) Act, 2015*.

The plan is built around the Council's vision of *Acting Today for a Better Tomorrow* informed by updated local evidence and extensive involvement of residents and stakeholders. It sets out a series of well-being objectives designed to shape a resilient, healthier and more prosperous Merthyr Tydfil. These objectives focus on key areas such as learning and aspiration, health and well-being, community safety and prosperity and environmental quality, consistent with the themes outlined in the Council's wider *Statement of Well-being 2023–2028*.

The plan explains how these objectives will be delivered through corporate programmes, monitored through established performance frameworks and supported by clear links between strategic goals, service planning and individual responsibilities; the Council's strategic "golden thread."

It provides a structured, long-term framework for improving outcomes for communities, ensuring the Council's work is sustainable, citizen-focused and able to meet the needs of current and future generations.

#### 2.45 Merthyr Tydfil Strategic Valley Hub Placemaking Plan (2019–2035):

This plan sets out a long-term vision to transform Merthyr Tydfil Town Centre into a more connected, vibrant, and economically resilient regional hub. It provides a strategic framework for regeneration based on a shared ambition between Merthyr Tydfil County Borough Council, the Welsh Government and Transport for Wales.

The Plan identifies key issues and opportunities shaping the town's future, establishing core ambitions for 2035 and prioritising improved transport and mobility, which are central to successful redevelopment. Two "signature projects" consisting of the redevelopment of the Glebelands site and the Train Station/Interchange Corridor, are anticipated to be catalysts for change.

Supporting evidence, including transport appraisals, commercial analysis and an economic impact assessment, underpin a suite of recommended interventions that together form a blueprint for delivering a more successful, sustainable town centre, up to 2035.

#### 2.46 Town Centre Masterplan (Updated Iteration, 2020–2024):

This plan provides an updated framework for regenerating the town centre, building on earlier masterplans and aligning with the wider *Strategic Valley Hub Placemaking Plan (2019–2035)*. It outlines progress to date, identifies ongoing and emerging projects and guides future development priorities.

The Masterplan forms part of a suite of documents comprising the *Strategic Place-making Plan*, supporting evidence (including transport, commercial and economic assessments) and the *Delivery & Implementation Plan*. It focuses particularly on transport-led improvements, recognising that many regeneration projects depend on enhanced connectivity and infrastructure.

Furthermore, it acts as a live, evolving document, shaping a more connected, vibrant and sustainable town centre, while supporting long-term investment and funding opportunities.

#### 2.47 Communications & Engagement Strategy 2023-2028:

This strategy sets out how Merthyr Tydfil County Borough Council (MTCBC) will engage and communicate with its diverse audiences, ensuring that residents, partners, staff, businesses and community groups are kept informed and can meaningfully shape local services.

The Strategy explains the Council's commitment to providing high-quality, bilingual, accessible communication and fostering two-way engagement. It outlines the audiences it serves, the communication channels it uses (including digital communications, social media, consultation, media relations, events and crisis communications) and the importance of listening to feedback to inform future service delivery.

It is described as a "living document", reviewed regularly to stay aligned with new legislation and emerging needs. The strategy supports the Council's wider vision to strengthen Merthyr Tydfil's role as a regional centre and aligns with its corporate priorities across learning, health, prosperity, and the environment. It aims to help the Council communicate transparently, build trust, and increase public understanding of its work.

#### 2.48 Merthyr Tydfil Decarbonisation Plan 2023–2030:

The plan sets out the Council's pathway to achieving net-zero carbon emissions by 2030, responding to the Welsh Government's climate emergency declaration. The Plan acknowledges the growing local impacts of climate change and outlines a focused, structured approach to reducing emissions across Council operations.

The strategy is built around six key themes: buildings and energy use, travel and transport, procurement, outsourced services, land management and governance; with each theme supported by dedicated action plans. Significant progress has already been made through measures such as LED street lighting upgrades, energy-efficiency improvements in over 30 Council buildings, fleet electrification and biodiversity enhancement projects.

Upcoming major initiatives include large-scale retrofits, low-carbon heat feasibility work, renewable energy projects (including solar private-wire networks and regional wind farm partnerships) and enhanced energy monitoring. Recent efforts have already delivered a 36% reduction in emissions and around £1.2m in energy savings since 2015-2016.

The Plan is also a living document, reviewed regularly, and delivered through a programme-management approach, with the Council working towards accreditation such as ISO 50001 and the One Planet Standard.

#### 2.49 Local Area Energy Plan, Merthyr Tydfil, 2024:

The Local Area Energy Plan (LAEP), developed in conjunction with key stakeholders, was endorsed by the Council in 2024. The LAEP is an ambitious road map to decarbonise local energy systems, working towards achieving net zero. The plan has been developed specifically for the County Borough's landscape and has taken challenges and opportunities for practical, sustainable solutions into account, which encompasses a broad range of initiatives. These include enhancing energy efficiency in homes/businesses, increasing the deployment of renewable energy sources and exploring innovative technologies.

#### 2.50 Welsh Language Strategy 2022-2027:

The strategy sets out Merthyr Tydfil County Borough Council's plan to promote, increase and normalise the use of Welsh across the County Borough. It aims to strengthen the visibility and everyday use of the language, while supporting the Welsh Government's wider goal of one million Welsh speakers by 2050. The Strategy focuses on three key areas:

- Children and Young People – expanding opportunities for Welsh-medium learning and early language acquisition.
- Community – increasing the use of Welsh in cultural, social and community settings, supported by partners such as Menter Iaith Merthyr Tudful.

- The Workforce – improving bilingual capability within the Council to strengthen Welsh-medium service delivery.

It also sets a target to increase the proportion of Welsh speakers locally, delivered through strong partnership working and alignment with the *Welsh in Education Strategic Plan, 2022-2032*.

#### 2.51 Participation Strategy 2023-2028:

The strategy outlines how Merthyr Tydfil County Borough Council will encourage and support greater public involvement in local democratic processes and service delivery. It responds to new duties under the *Local Government and Elections (Wales) Act 2021*, aiming to make it easier for residents, staff, businesses and community groups to influence Council decisions.

The strategy promotes a shift toward ongoing, meaningful two-way engagement, clarifying how the Council communicates, consults and gathers feedback. It emphasises the principles of good engagement: integrity, visibility, accessibility and transparency, to ensure that participation is inclusive and effective.

It too is a living document, reviewed regularly and reliant on commitment from both Elected Members and staff to embed participation into everyday practice.

#### 2.52 Strategic Equality Plan 2024-2028:

The plan sets out Merthyr Tydfil County Borough Council's framework for promoting equality, reducing discrimination and fostering inclusive, cohesive communities. The Plan is shaped by the *Equality Act, 2010*, including the Public Sector Equality Duty, and outlines how the Council will advance equality through service delivery, employment, commissioning, leadership and partnership working. The strategy sets six core equality objectives for 2024–2028, these being:

- Inclusive Engagement and Participation – ensuring all citizens can participate, have their voices heard and influence decisions.
- Accessible Services – identifying and removing barriers to accessing Council services.
- Inclusive and Diverse Workforce – creating a workforce that reflects the community and supports equal opportunities.
- Equity of Pay – addressing gender and equal pay issues.
- Safe, Inclusive and Cohesive Communities – supporting safety, respect, community cohesion and tackling prejudice.
- Education, Skills and Employment – promoting fairness and opportunity through learning, training, and pathways into work.

The Plan aligns with the Council's corporate well-being objectives (2023–2028) and is informed by public consultation, local data and national evidence (including the *Is Wales Fairer?* reports). It emphasises ongoing monitoring, partnership working, and transparent review to ensure progress is measurable and meaningful.

#### 2.53 Merthyr Tydfil Local Housing Market Assessment (LHMA) 2022–2037:

The LHMA identifies a significant short-term need for additional affordable housing, driven by rising homelessness, legislative changes and wider socio-economic pressures. The assessment finds a requirement for 453 affordable homes per annum, however, after accounting for expected supply, this equates to a net need of 114 additional affordable homes annually until 2027. A very high proportion of this need is for one-bedroom social rented homes, reflecting pressure on single-person households.

Beyond 2027, the projected affordable housing need reduces to 11 homes per year, signalling stabilisation after the initial surge. The assessment also identifies a requirement for 35 market homes annually, with the majority (66%) needed in the private rented sector. A growing need for adapted and accessible homes is highlighted, with 9.4% of households on the register requiring adaptations.

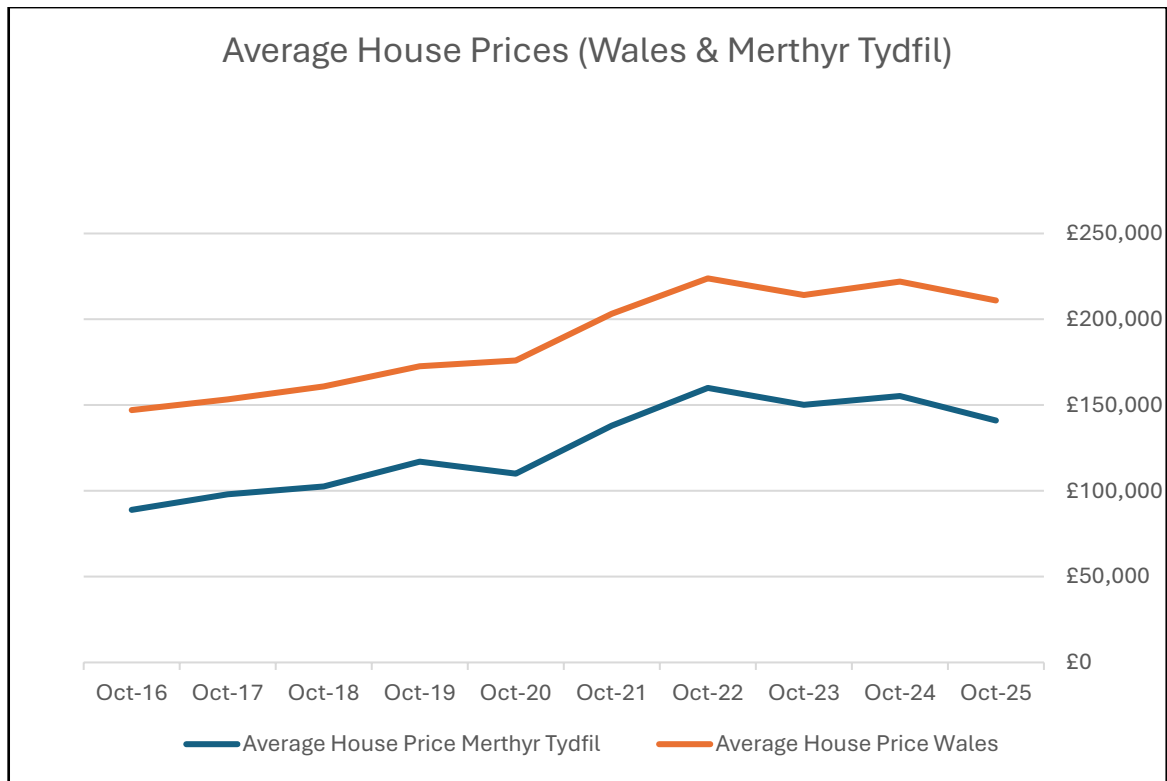
The LHMA is a key Evidence Base document for planning, policy development, funding bids and negotiation of affordable housing contributions, ensuring a mixed balance of homes is delivered to support sustainable and resilient communities.

#### 2.54 House Prices:

The most recent overview of the housing market within MTCBC is informed by the latest Land Registry *UK House Price Index (HPI)* dataset. The data highlights that average house prices within the County Borough have followed the same peaks and troughs as the national average, albeit at a significantly lower level.

The HPI dataset illustrates that the average house price within the County Borough is consistently below the Welsh national average. Whilst it is unlikely that prices within MTCBC will inflate to match the national average; it is anticipated that the national housing shortage and improved connectivity in relation to the South Wales Metro will continue to drive market growth, helping to meet need within the County Borough.

The graph below provides a visual representation of the HPI dataset.



Source: UK House Price Index

Over the period between October 2016 and October 2025, the average house price in County Borough rose from £88,930 to £141,000. The average house price peaked in October 2022 at £160,000, with October 2024 recording the second highest average price, at £155, 236. By contrast, the Welsh average in October 2016 was £147,065, rising to £211,000 in October 2025. In line with the trend witnessed in MTCBC, the average Welsh house price peaked in October 2022 at £223,824, with October 2024 witnessing the second highest average price, at £222,000.

2.55 The changes identified in this section will impact upon the LDP Strategy and policies, as well as highlighting that certain proposals may be out of step with the market. The volume of contextual changes that have occurred since the LDP’s adoption are of such significance that they warrant a review of the Plan.

## Section 3 – Joint Working Opportunities

- 3.0 *The Development Plan Manual (ed.3)* is clear that Local Planning Authorities (LPAs) should explore options for collaborative working, where possible. It makes clear that for LDP reviews, LPAs should:

*...consider and demonstrate they have exhausted all opportunities for joint working and collaboration on both plan preparation and the evidence base, maximising the opportunities and efficiencies of evidence gathering, consultation and co-operation in tandem, or through joint working arrangements. This will be particularly relevant for LDPs on similar preparation timescales and have strong geographical and/or functional linkages* (Welsh Government, p10, 2020).

- 3.1 It continues that the consideration of issues on a larger scale, place LPAs in a much stronger position to resolve planning issues, align with the five ways of working and comply with the Tests of Soundness.
- 3.2 As part of the review process, the Council has considered opportunities for joint working with neighbouring authorities. The present position of each LPA is set out below.
- 3.3 Bannau Brycheiniog National Park:

A consultation has been undertaken on the Delivery Agreement (DA) and it was intended that it should be submitted to the National Park Authority for approval, prior to being sent to the Welsh Government. There has however been a delay due to staffing issues, particularly in recruiting a Planning Policy Manager. Despite this, work is continuing on the preparation of the DA (and associated matters), as far as is possible. It has been suggested that the authority consider producing an LDP Lite (LDPDL) to align with the emerging SDP, as opposed to exploring a full replacement LDP. Given the overall uncertainty in regard to plan preparation within the National Park Authority, the relatively small area of the national park that is situated within Merthyr Tydfil and the end date of the current Merthyr Tydfil LDP, joint working is not considered to be a prudent option at this point in time.

- 3.4 Blaenau Gwent County Borough Council:

Work was being undertaken on the Deposit Plan, with the intention of undertaking Deposit consultation in early 2026. Despite this, Blaenau Gwent have instead opted to investigate the potential for joint working with Torfaen, inclusive of Evidence Base requirements and a joint LDP. A Special Council has been scheduled for March 2026, where the report on joint working will be presented. Blaenau Gwent intend to withdraw their Replacement LDP however work will continue with landowners and site promoters, although a new call for Candidate Sites will need to be undertaken. Given the geographical separation between Merthyr Tydfil and the County Boroughs of Blaenau Gwent and Torfaen, it is considered that it is unfeasible to explore joint working with these authorities.

### 3.5 Bridgend County Borough Council:

Bridgend adopted a full replacement LDP in March 2024. Bridgend will not look to review the plan until at least 2028. As a result of this, as well as a clear geographical separation, it is not possible to explore joint working opportunities with Bridgend County Borough Council at present.

### 3.6 Caerphilly County Borough Council:

Caerphilly intended to consult on their Deposit Plan in January 2026, although this has been delayed until later in the year, due to the Senedd elections in May. The local elections next year are also likely to have an impact on timescales. As Caerphilly are already compiling the Deposit LDP, it does not seem feasible to explore joint working opportunities at this time.

### 3.7 Cardiff City Council:

Cardiff submitted their Replacement LDP for Examination in late 2025. PEDW have informed them that Inspectors have been appointed. The pre-hearing meeting is scheduled for 24<sup>th</sup> of March 2026, with Hearings scheduled to commence on 9<sup>th</sup> of June. Therefore, it is not possible to explore joint working opportunities with Cardiff City Council at present.

### 3.8 Monmouthshire County Borough Council:

Monmouthshire submitted their Replacement LDP to PEDW for Examination in November 2025. There have been several initial queries from Inspectors however and additional work is required to specifically address the issues surrounding Phosphates. Consequently, the Examination procedure has been postponed until the 23<sup>rd</sup> of February 2026. Given that Monmouthshire are at the Examination stage and are geographically separated from Merthyr Tydfil, it is not considered feasible to explore joint working opportunities.

### 3.9 Newport City Council:

Newport is presently preparing their Deposit Plan, with consultation expected in 2026. This will however be contingent on the availability of consultants to undertake the requisite work. For this reason, in conjunction with geographical separation, it is not feasible to explore joint working opportunities with Newport City Council.

### 3.10 Rhondda Cynon Taf County Borough Council:

Rhondda Cynon Taf is preparing the Deposit Plan at present however it is unlikely that the plan will be go out to consultation prior to the Senedd elections. Given the progress of the Deposit plan, it is not possible to explore joint working opportunities with RCT presently.

### 3.11 Torfaen County Borough Council:

Torfaen are working in conjunction with Blaenau Gwent. Following a Special Council in March, there is an intention to progress a Joint Delivery Agreement in July 2006, with a view to officially commencing plan preparation in January 2007, working around local government elections. As alluded to above, due to geographical separation, it does not seem prudent to explore joint working opportunities with these authorities.

### 3.12 Vale of Glamorgan Council:

The Vale of Glamorgan Council have recently received approval to consult on their Deposit Plan. The Consultation commenced on 28<sup>th</sup> of January 2006, and the Delivery Agreement has been amended to reflect this. Consequently, there does not appear to be scope to explore joint working opportunities with the Vale of Glamorgan at present.

3.13 Despite a desire at national level for more integrated, joint working; at present it is unfeasible for Merthyr to consider joint studies, other Evidence Base documents or indeed a joint LDP. Immediate neighbouring authorities are either at the Deposit stage of plan preparation or have adopted their replacement LDPs. Blaenau Gwent and Torfaen are currently embarking upon a replacement plan however Merthyr Tydfil is separated geographically from these Council's administrative areas, making joint working impractical. The Council remains amenable to practicable joint working arrangements and will keep the situation under review, in case anything should change in the short-term.

## Section 4 – Review of the Vision and Objectives

4.0 This section considers how the findings of the previous section impact upon the *MTCBC First Replacement Local Development Plan*. It will involve an analysis of the LDPs Vision and Objectives.

### Vision

4.1 The LDP identified a number of key issues to be addressed that, alongside a partnership approach and stakeholder engagement, contributed to the Vision for the Plan. The Vision has also been informed by several key strategies and plans, inclusive of the Cwm Taf Well-being Plan.

4.2 The LDP's Vision provides a clear image of how the County Borough should look in the future. It is imperative that the Vision reflects community aspirations and local needs throughout the plan period and beyond. Together, the Vision and Objectives provide an over-arching context for the LDP, highlighting how those economic, social, cultural and environmental considerations are balanced to achieve the development of the County Borough, in a sustainable manner, up to 2031. The Vision for the County Borough aims:

*To strengthen Merthyr Tydfil's position as the regional centre for the Heads of the Valleys within the Cardiff Capital Region, to encourage a sustainable level of population growth and be a place to be proud of, where:*

- *People learn and develop skills to fulfil their ambitions.*
- *People live, work and have a safe, healthy and fulfilled life.*
- *People visit, enjoy and return.*

4.3 The introduction of the *Well-being of Future Generations (Wales) Act, 2015* (WBFGA) saw the initiation of a Public Service Board (PSB) for the Cwm Taf area, initially comprising Merthyr Tydfil and Rhondda Cynon Taf. The PSB is comprised of the Local Authorities and the Local Health Board, as well as various other professional, educational and third sector organisations. It is worth noting that the PSB area was amended in 2023 to include Bridgend, becoming known as Cwm Taf Morgannwg.

4.4 In accordance with *Planning Policy Wales (ed. 12)*, planning authorities must have regard to the Well-being Plan published by the PSB during LDP preparation and review. *The Cwm Taf Well-being Plan (2018-2023)* and its successor the *Cwm Taf Morgannwg Well-being Plan (2023-2028)* are key documents within the Evidence Base, as they cement the contribution that planning makes to achieving the well-being goals, set out in the WBFGA.

4.5 At the time the Merthyr Tydfil First Replacement LDP was adopted, the *Cwm Taf Well-being Plan, 2018-2023* was in place. The Plan was the result of two years' work, with community involvement being central to its production. The PSB produced the plan, viewing it as an opportunity to foster cohesion and strengthen its work as "one public service." As part of the Statement of Intent, the Plan sets out a clear ambition:

*To work as One Public Service, with communities, to support the development of resilient communities that are informed, connected, active and resourced and have the ability to adapt and influence change and improve well-being.*

*The Cwm Taf Well-being Plan's overarching objectives are to:*

- *promote safe, confident, strong and thriving communities improving the well-being of residents and visitors and building on our community assets;*
- *help people live long and healthy lives and overcome any challenges; and*
- *grow a strong local economy with sustainable transport that attracts people to live, work and play in Cwm Taf.*

4.6 Whilst the LDPs Vision and the *Cwm Taf Well-being Plan* are broadly compatible, the LDP Vision requires revision to align with the objectives set forth in the *Cwm Taf Morgannwg Well-being Plan (2023-2028)*. The most recent Well-being Plan has a stronger focus on inequality in relation to communities, lifestyle and the environment, improving well-being for all whilst building a fairer future. Furthermore, there is a greater emphasis on understanding and responding to the risks of climate change within local communities. It advocates that this approach should be centred around valuing, managing and enjoying green and blue spaces responsibly. The LDP will need to reflect these objectives by mitigating against the effects of climate change and providing opportunities for all to reduce inequality in our communities and environment. This will include protecting green and blue infrastructure and improving access to open spaces.

4.7 Whilst the LDP cannot deliver all identified local well-being outcomes, given that certain objectives extend beyond the remit of land-use planning, nonetheless the LDP aims to create the conditions to support their delivery. The LDP remains a mechanism for aiding delivery of these over-arching objectives, however, it is acknowledged that there are many other organisations, plans and strategies that make significant contributions to their delivery.

## **LDP Objectives**

4.8 The LDP has a set of eighteen objectives covering a range of social, economic, environmental and cultural matters. The objectives contain several cross-cutting themes and were developed to enable a move towards an innovative, productive and low carbon society that recognises the limits of the global environment and

manages resources efficiently. The list of the objectives contained within the LDP is presented below:

<b>LDP Objectives</b>	
LDP Objective 1 Sustainable Population Growth:	To encourage a sustainable level and distribution of population growth.
LDP Objective 2 Welsh Language and Culture:	To protect and enhance Welsh language and culture.
LDP Objective 3 Housing Provision:	To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.
LDP Objective 4 Regeneration:	To promote the suitable reuse of previously developed land and the continued regeneration of local communities.
LDP Objective 5 Infrastructure:	To ensure that community infrastructure and open space support the regeneration of local communities.
LDP Objective 6 Sustainable Design:	To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change.
LDP Objective 7 Transport:	To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.
LDP Objective 8 Community Facilities:	To support existing community facilities and suitable community led development.
LDP Objective 9 Heritage and Cultural Assets:	To protect, enhance and promote all heritage, historic and cultural assets.
LDP Objective 10 Biodiversity:	To improve ecosystem resilience and connectivity which support habitats and species of principal importance.
LDP Objective 11 Countryside and Landscape:	To protect and enhance the character and appearance of the landscape and the countryside.
LDP Objective 12 Economic Development:	To provide and safeguard appropriate land for economic and skills development.
LDP Objective 13 Rural Economy:	To strengthen and diversify the rural economy.
LDP Objective 14 Town and Local Centres:	To develop the town and local centres as accessible, attractive, viable and vibrant places.
LDP Objective 15 Leisure, Recreation and Tourism:	To support sustainable tourism, leisure and recreation developments and encourage an all-year-round tourism industry.
LDP Objective 16 Renewable Energy:	To promote renewable and low carbon energy.
LDP Objective 17 Minerals:	To ensure a sustainable supply of minerals.

LDP Objective 18 Sustainable Resources & Waste:	To promote the efficient use of materials and resources and ensure an integrated network of waste management facilities.
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4.9 These objectives remain largely appropriate in terms of contributing to the Well-being Goals and the objectives set out in the Well-being Plan. It is however acknowledged that some revision will be required to reflect the greater emphasis on equality and mitigating against the impacts of climate change. The significant contextual changes, including the new Technical Advice Note 15, will also necessitate a revision to the LDP's Objectives. Such changes will be fundamental to improving community, lifestyle and environmental inequality and responding to the risks of climate change locally.

## Section 5 – LDP Strategy

5.0 This section is concerned with the LDP Strategy. The Strategy is based on identifying:

*...growth and spatial options which seek to address a projected population decline by encouraging a sustainable level of population growth, by directing development primarily to Merthyr Tydfil and, in particular, to the 'Hoover Strategic Regeneration Area' (HSRA) in (Abercanaid/Pentrebach) as well as to other small sites across the County Borough.*

5.1 Additionally, the strategy is concerned with ensuring access to employment and recreational opportunities. It recognises the County Borough as the main retail and service centre within the Heads of the Valleys, with connections provided by the South-East Wales Metro and Active Travel routes to the Cardiff Capital Region, the Swansea Bay City Region and the Bannau Brycheiniog National Park.

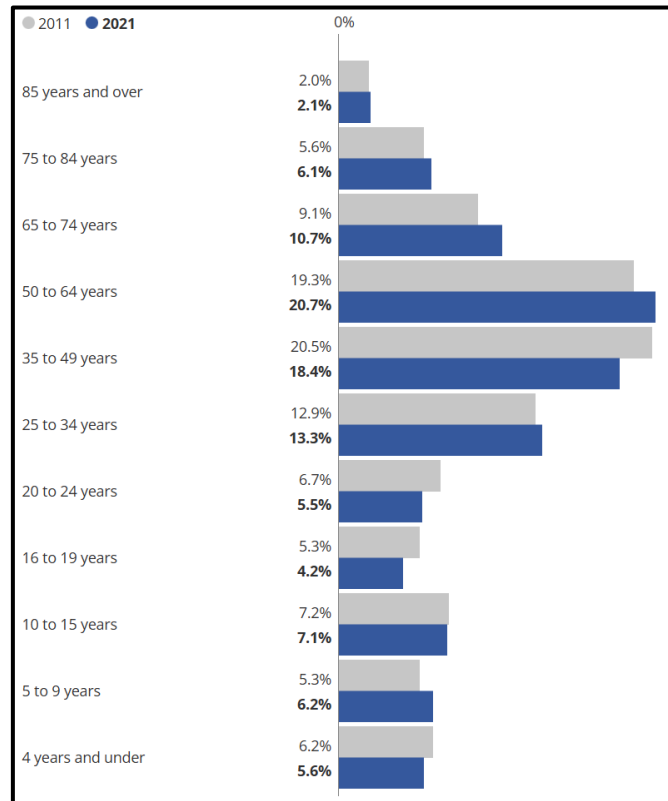
### Population

5.2 At the time of compiling the adopted LDP, the population of the County Borough was projected to decline, as such the Strategy sought to ameliorate this through targeted growth. By 2031, it was hoped that growth within the County Borough would correlate with a rise in population to 64,000 individuals. This target is unlikely to be met in light of the 2021 Census and Welsh Government mid-year estimate data.

5.3 The Census data from both 2011 and 2021 however told that the population has remained relatively stable. The 2021 Census records the population as 58,839, largely consistent with the 2011 Census figure of 58,851. Acknowledging that migration patterns across the UK can be complex; the Census data appears to indicate stable inward and outward migration levels within the County Borough.

5.4 Despite the relative stability in the population, some notable changes have occurred within its composition. Overall, there has been a 13.3% increase in persons aged 65 years and over. Additionally, the number of children aged 15 and under has also increased by 3.7%. In contrast however, the number of individuals aged between 15 and 64 years has witnessed a 4.3% decrease. Merthyr Tydfil County Borough has an aging population structure, which will need to be catered for through the LDP. In 2011, the working age population (age 16-64) was 64.7% of the total population. The 2021 Census data however indicates that this figure has fallen to 62.1%. The graph below shows the percentage of residents by age group:

## Percentage of Residents by Age Group 2011 and 2021 Census



Source: Office for National Statistics, 2011 and 2021 Census

5.5 The latest Welsh Government mid-year population estimates for Wales, released in November 2025, indicate that all twenty-two local authorities' populations are projected to increase up to 2032. Although it is noted that Merthyr Tydfil is set to have the smallest increase, at just 1%. Moreover, all local authorities are projected to witness a decrease in the number of children and young people, aged 15 and under (with Newport as the exception). Should trends continue, as anticipated, the LDP will require review to consider how the needs of older persons can be met, in terms of health, care and suitable housing.

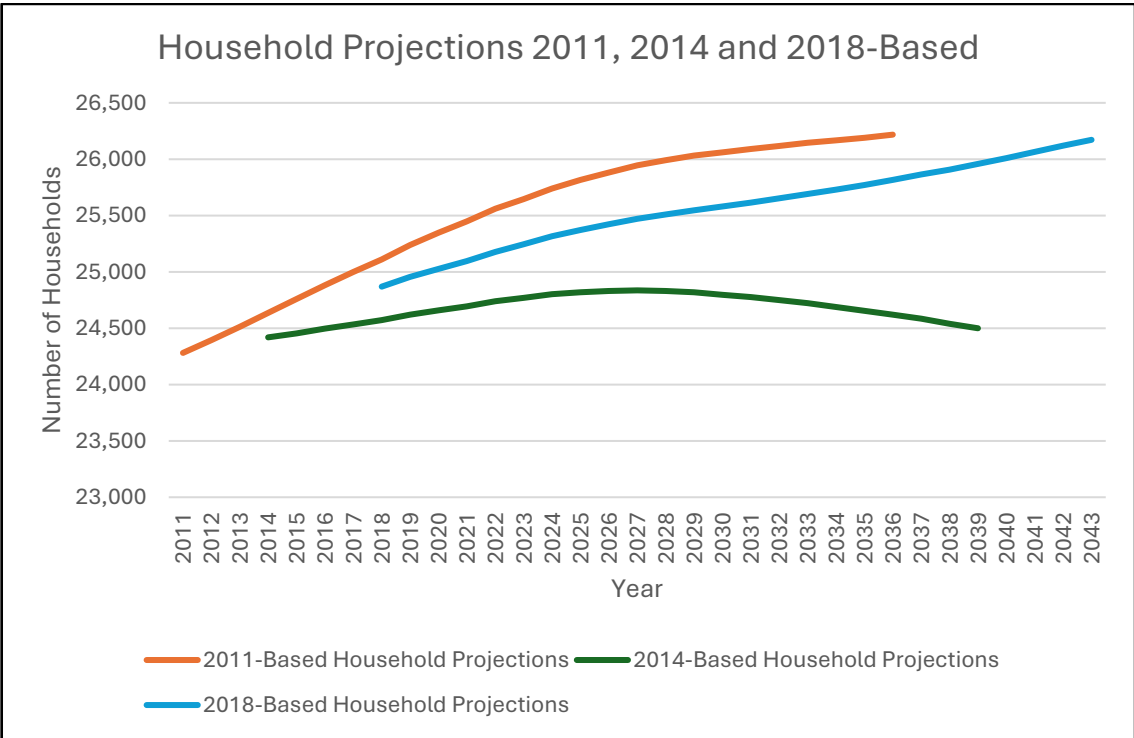
### **Housing Trajectory**

5.6 Following the adoption of the *Merthyr Tydfil First Replacement Local Development Plan* in January 2020, the Joint Housing Land Availability model and the associated Technical Advice Note (TAN 1: Joint Housing Land Availability Studies (JHLAS)) were cancelled (March 2020). *The Development Plans Manual (edition 3)*, published in March 2020, replaced the JHLAS process with a housing trajectory model.

5.7 The housing trajectory forms part of the LDP, providing a summary of development phasing for all housing sites within the Plan, inclusive of small and large windfall sites and land-bank sites. The trajectory model is the key

mechanism for demonstrating how sites will be delivered within the identified timescales, to meet the dwelling requirement (Welsh Government, 2020, p122).

- 5.8 The baseline data for the projected number of dwellings required over the plan period is provided by the Welsh Government’s household projections. These are linked to the population projections and together allow Local Planning Authorities (LPAs) to assess demand within their administrative area. The household projections are trend-based calculations that support longer-term strategic planning and inform the strategies of LDPs. Furthermore, they track household composition, which in turn helps to assess the need for certain house types. The projections are also supported by the decennial Census, which in 2021 held that Merthyr Tydfil had 25,785 households, of which 32% were one person households, 63.9% were single family households and 4.1% were comprised of ‘other’ dwelling types.
- 5.9 The graph below shows the Welsh Government household projections for the 2011, 2014 and 2018-based data. As can be seen, there were some discrepancies in estimates, which alongside errors in the population projections, led to an ambitious growth/housing target in the adopted LDP. This will need to be reviewed as part of the Replacement LDP to ensure an appropriate and realistic housing target is implemented.

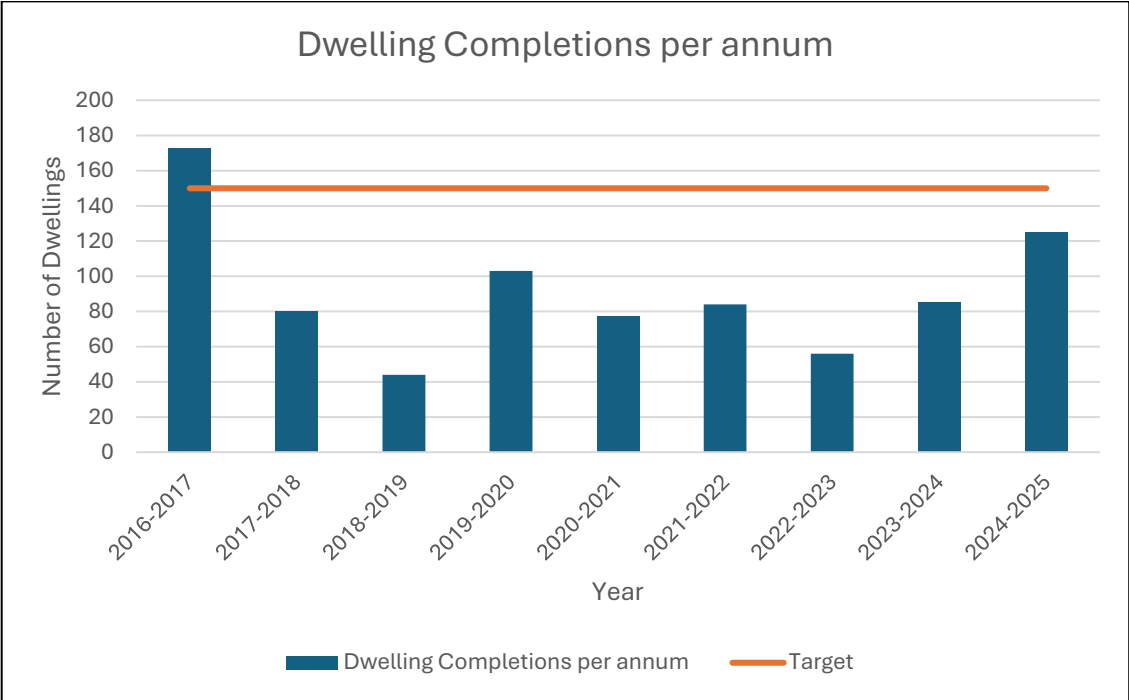


Source: StatsWales

**Housing**

- 5.10 Understanding changes in population is crucial to determining the requisite number of dwellings to be delivered over the plan period. The Strategy of the

adopted LDP seeks to deliver a total of 2,250 dwellings, from 2016 up to 2031, a build rate of 150 dwellings per annum (dpa). A 25% flexibility allowance is added to this figure, meaning a maximum of 2,812 dwellings over the plan period (188 dpa). Despite being lower than the ambitious build rate of the preceding plan (253 dpa), it is nonetheless a significant number given the County Borough’s lower land values and slender margins of viability. The graph below shows the number of dwellings complete per annum, since the commencement of the plan period, set against the 150 dpa target.



- 5.11 As of April 2025, the target dwelling requirement stated within the AMR, is 1,263 dwellings. The actual number of completions is 827 dwellings, as of the 31<sup>st</sup> of March 2025, meaning a deficit of 436 dwellings.
- 5.12 2016-2017 is the only time that the target has been met or exceeded, with 173 dwellings complete. Otherwise, 2024-2025 is the nearest to the target, with 125 completions. The lowest completion rate was witnessed in 2018-2019 when only 44 dwellings were erected, with 2022-2023 being the second lowest, with 56 completions.
- 5.13 Within the Primary Growth Area (PGA), 553 dwellings have been complete up to the 31<sup>st</sup> of March 2025, compared with a target of 889 dwellings by April 2025. Similarly, in the Other Growth Area (OGA), 293 dwellings have been complete up to the 31<sup>st</sup> of March 2025, compared with a target of 424 dwellings by April 2025. To date, this leaves a deficit of 356 dwellings within the PGA and 131 dwellings in the OGA, meaning that development is not being delivered as anticipated within these areas.
- 5.14 The wider economy has been a significant factor in not meeting the anticipated dwelling requirement to date. Since 2016, the decision to leave the European Union (Brexit) and the COVID-19 global pandemic have also contributed to a

downturn in the economy and a contraction in the housing industry. The national house builders are often drawn to areas where the market is typically more buoyant, and the margins of viability are higher. Such areas are typically focused within Cardiff and along the M4 corridor.

- 5.15 To provide context, Persimmon are currently the only national house builder operating within the County Borough, building out the Twynyrodyn housing allocation. There are also two small and medium enterprise (SME) builders present within the County Borough, with Davies Homes building on the Dragon Park allocation and W.D. Lewis Homes (WDL Homes) operating on a non-allocated site in Trefechan. Despite dwellings selling well on these schemes, uncertainties remain with regard to delivering a consistent level of provision commensurate with the levels witnessed in 2016-2017. While a downturn in the economy persists, it is increasingly unlikely that the housing market within the County Borough will witness a period of sustained growth in the near future.
- 5.16 Certain initiatives have the potential to increase the number of dwelling completions within the County Borough, over the coming years. These include further investment in the South-East Wales Metro scheme, in addition to investment from the £1.2billion Cardiff Capital Region City Deal, which will provide infrastructure and investment to unlock growth potential.
- 5.17 Conversely, development will continue to be a more attractive prospect to national house builders in Cardiff and along the M4 corridor, particularly on greenfield land. Cardiff City Council, who have published their Deposit Plan, have several large greenfield sites, with a total dwelling requirement of 24,000 new homes over the plan period (2021-2036). Rhondda Cynon Taf County Borough Council are concentrating large amounts of development on greenfield sites within the southern part of their Borough, that boast good strategic links to the M4.

## **Affordable Housing**

- 5.18 In relation to the delivery of net additional affordable housing, the policy target requires the delivery of 154 affordable dwellings by 2024-2025. The latest AMR analysis highlights that 225 net additional affordable houses have been delivered, which is 30% above the target level. Therefore, it is considered that the delivery of affordable housing has been successful and looks likely to exceed the target of 251 net additional affordable dwellings by April 2031.
- 5.19 Given that the above is only concerned with the net additional number of affordable dwellings, delivered as part of market housing schemes; the affordable housing strategy, market areas and the percentages sought through the policy requirement will need to be reviewed. Review is essential to ensuring that the Plan continues to meet the affordable housing requirement identified through the most recent Local Housing Market Assessment (LHMA), which has been updated subsequent to the adoption of the first replacement LDP.

5.20 In conclusion, the overall rate of dwelling completions is not sufficient to meet the housing requirement identified in the LDP. Consequently, the LDP Strategy is not being delivered, as envisaged. Furthermore, the stalled economy creates additional uncertainties concerning delivery of the dwelling requirement, within the remaining plan period (to 2031). As such, this issue needs to be reviewed to ensure that the Council can reconsider the level and spatial distribution of housing growth required.

## **Employment Land and the Economy**

5.21 An important element of the LDP Strategy involves ensuring individuals can access job opportunities, alongside services and recreational opportunities. Moreover, the Strategy acknowledges the County Borough's role as the main retail and service centre within the Heads of the Valleys.

5.22 The 2018 Employment Land Review (ELR) for the County Borough highlighted a desire for growth in existing businesses. Furthermore, it anticipated good prospects for securing inward investment opportunities, principally for Class B2 uses. The study did however illustrate a shortage of industrial and warehouse units of all sizes, throughout the County Borough. To secure sufficient access to employment opportunities, 30.65ha of employment land was allocated to meet the identified need in the LDP.

5.23 The latest Annual Monitoring Report (AMR) data (2024-2025) indicates that of the 30.65ha allocated for employment, only 0.6ha has been developed. This is significantly below the targets stipulated within the AMR of 4.82ha by April 2021 and 9.64ha by April 2026. It is acknowledged that employment developments do not tend to occur incrementally, instead being prone to sudden increases, as single companies occupy larger spaces. The 30.65ha was allocated to provide opportunities for inward investment that have not materialised, largely due to the stalling economy and a reluctance for speculative investment.

5.24 During the last decade, the poorer performance of employment development should be framed within the context of the performance of the UK economy. The economy, over the last ten years, has been characterised by low growth, high inflation (reaching a 41 year high in October 2022) and an under-performance in comparison with other G7 countries. As a result, the stalling economy (which has not recovered from the impacts of Brexit and COVID-19) has witnessed high debts, low business investments and has created a cost-of-living crisis for many within our local communities. These issues will need to be reviewed to ensure that:

- Local provision remains appropriate.
- The employment need/offer is not out-of-step with the market.
- The safeguarding of certain sites for employment purposes is not frustrating or stymying the development of other land uses.

5.25 Employment forms a fundamental part of the LDP Strategy and should be analysed in tandem with housing to ensure that issues such as housing forecasts, population change and sustainable modes of travel are fully considered. The *Development Plans Manual* is clear that employment forecasts should not be developed in isolation but should instead consider the relationship between economic and demographic projections. This in turn helps to inform the Spatial Strategy for the County Borough.

## **Section 6 – LDP Policy Review**

6.0 This section of the report is concerned with the LDP policy review. A review of all policies has been undertaken having due regard to:

- The findings of the five Annual Monitoring Reports (AMRs) published following the adoption of the Plan.
- The significant contextual changes that have occurred since the First Replacement LDP's adoption (listed in Section 2). This includes changes at the local and regional level, as well as amendments to national policy, guidance and legislation.
- Whether the topic-based policies have been implemented, as anticipated and are functioning effectively.

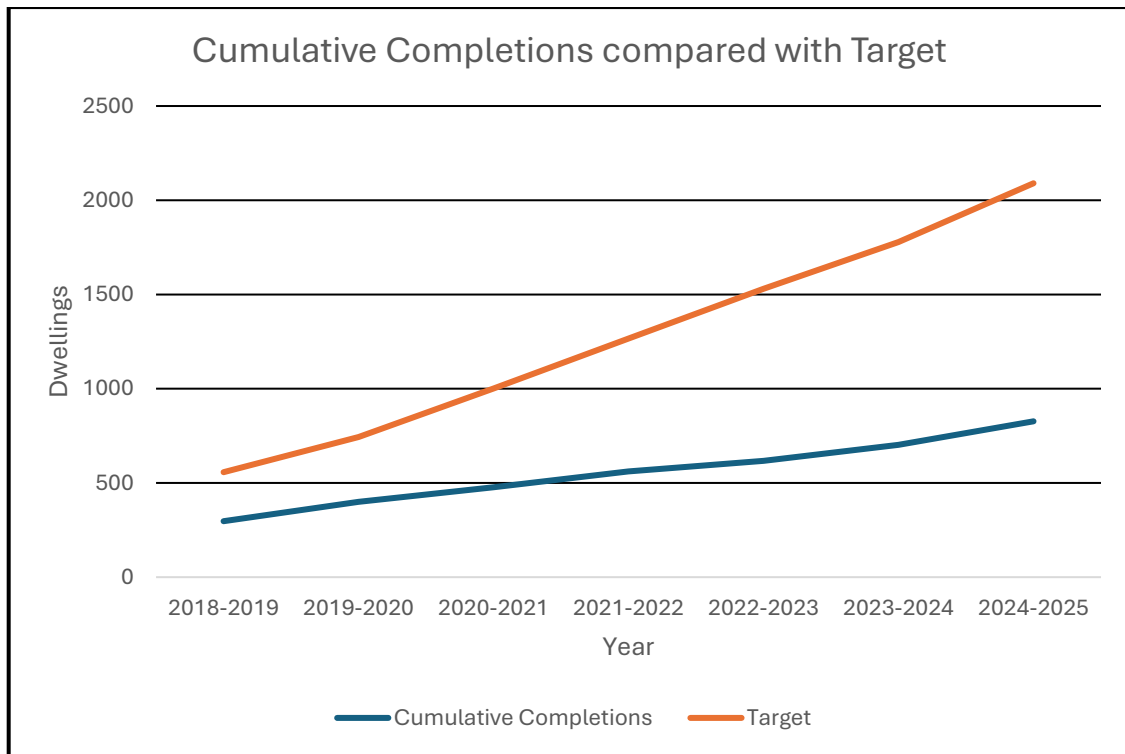
6.1 Appendix C provides an overview of the efficacy of the LDP policies and whether change is considered necessary, as part of the review procedure. The policies that are likely to require amendment, as a result of significant contextual changes, are detailed below under the relevant topic heading.

### Social Policies

#### **Housing**

6.2 Housing is one of the most substantial and important topics of the LDP, being fundamental to the successful delivery of the LDP Strategy. The policy governing the provision of housing is central in creating strong, sustainable communities with access to quality homes.

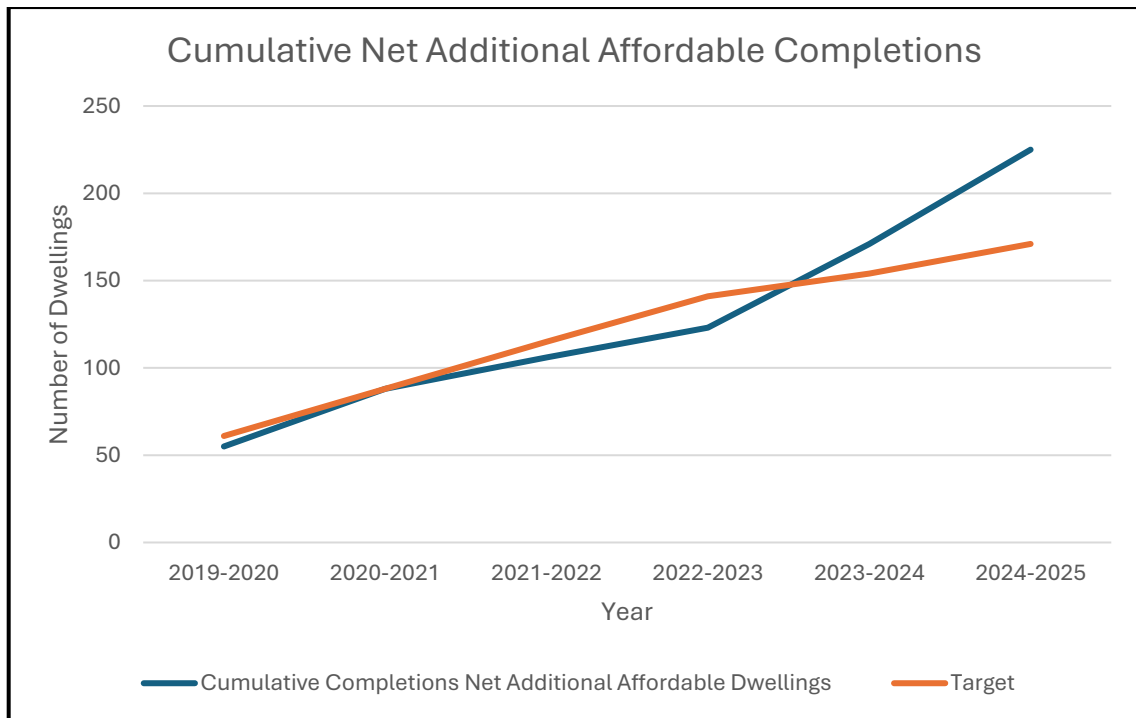
6.3 The level of housing provision is discussed in Section 5 of this report, using evidence from the five AMRs. To date, the adopted LDP has not delivered the anticipated level of housing provision (2,250 dwellings by 2031), with only 827 dwellings complete as of the 31<sup>st</sup> of March 2025, compared with a target figure of 1,263 dwellings for the same period. The graph below shows the cumulative rate of completions in comparison with the housing provision target.



- 6.4 As can be seen from the graph above, over time the level of provision continues to diverge from the target. There is a shortfall in housing provision that will necessitate review, to ensure that the level and spatial distribution of housing remains appropriate. The Strategy will similarly need to be examined to ascertain whether it remains the correct approach for the County Borough, particularly in light of the imminent commencement of the Strategic Development Plan (SDP) and the policy aspirations associated with the Cardiff Capital Region.
- 6.5 Consequently, it is likely that *Policy SW1: Provision of New Homes* will require revision to remedy the shortfall identified in the provision of housing. Furthermore, *Policy SW3: Sustainably Distributing New Homes*, which covers housing allocations in the Primary and Other Growth Areas, will also require review to ensure that allocations remain appropriate, viable and deliverable. Where sites are unlikely to be developed, they will not be considered for allocation in the replacement LDP. A detailed review of the current LDP allocations can be found at Appendix B.

### Affordable Housing

- 6.6 Affordable housing provision is detailed in Section 5, above, drawing on data from the AMR process. As stated, the delivery of net additional affordable housing is 30% above the target for the County Borough, as can be seen from the graph below.



- 6.7 The number of net additional affordable homes incorporates affordable properties delivered as a direct result of market housing delivery, through commitments, allocations (including 100% affordable housing sites) and windfall sites.
- 6.8 Since the adoption of the First Replacement LDP, there have been changes to the LDP Evidence Base, including the introduction of the Local Housing Market Assessment (LHMA), 2022-2027. In 2022, the Welsh Government issued a new methodology and accompanying guidance for undertaking LHMA. The findings of the 2022-2027 LHMA indicate a need for 453 affordable homes per annum, with a net additional requirement of 114 dwellings per annum. This a significant increase in comparison with the previous LHMA, which only required 366 affordable homes per annum.
- 6.9 Having regard to the above, it is likely that *Policy SW2: Provision of Affordable Housing* will require revision for several reasons. Principally, the latest LHMA is based upon a revised methodology and highlights a larger requirement for affordable housing provision. Moreover, the findings of the LHMA have the potential to impact upon the policy targets for affordable housing provision and will require further scrutiny. It is also worthy of note that the average house price has increased by over 30% since the adoption of the LDP, which also has the potential to affect the viability of affordable housing policy targets. Consequently, a full review of housing and affordable housing policy is necessary to reflect the most recent Evidence Base documents and changes to process and guidance.

### Affordable Housing Exception Sites

- 6.10 Policy SW5 of the LDP provides for sites of less than ten dwellings outside the defined settlement boundaries for affordable housing purposes, subject to certain

criteria. *Planning Policy Wales (ed. 12)* states that exception sites for affordable housing have the potential to help meet the identified requirement and contribute to the needs of local communities, therefore they must be considered. As such, *Policy SW5: Exception Sites* will require review, given that no affordable exception sites have been developed since the adoption of the LDP. It needs to be established why such sites have failed to materialise, recognising that issues such as the topography of available land and viability are likely contributory factors. This issue will need to be explored further.

## **Hoovers Strategic Regeneration Area**

6.11 The Hoovers Strategic Regeneration Site (HSRA) is identified in the First Replacement LDP as part of Policy SW 6, for the facilitation of a major mixed-use development comprising: 440 dwellings, 400sqm of retail provision, 1.5ha of employment land, a park and ride, a new foot/cycle bridge to Abercanaid, land for a new Metro station and a minimum of 1.79ha of open space. The HSRA is a key proposal in delivering the housing requirement and contributing to the supply of employment land and open space. These policy areas specifically, have hit trigger points within the latest AMR and need to be reassessed.

6.12 There have been several factors that have delayed the site's development, foremost amongst them has been the stalled economy, which is largely a result of the COVID-19 global pandemic. It is felt prudent to reassess this proposal in its entirety to ensure that it remains appropriate and in-step with the market. Interest remains in the site, with an outline application securing permission in January 2026. Remediation works are anticipated to occur throughout 2026 and into 2027, with potential for development from 2028.

## **Settlement Boundaries**

6.13 Settlement Boundaries will require analysis, as part of the LDP review process. They are performing effectively and are likely to only require minor amendment.

## **Provision for Gypsies and Travellers**

6.14 The latest Gypsy and Traveller Accommodation Assessment (GTAA) was produced in 2016, with an update provided in 2018 prior to the Examination of the *Merthyr Tydfil First Replacement LDP*. The *Development Plans Manual (ed. 3)* is unequivocal in its mandate for a GTAA to be up to date, identifying the requisite accommodation need over the plan period. It is noted that the assessment should detail current need, need at year five and overall need up to the end of the plan period. This will allow the Council to assess whether there is sufficient provision within existing sites or indeed whether a new site is required.

6.15 The GTAA and its associated update detail that the County Borough presently has twenty-six pitches, of which twenty-four are located on the existing public site (Glynmil), with the other two pitches being located on separate, authorised

private sites. Additionally, there are potentially fifteen Traveller households residing in bricks and mortar. The outcomes of the GTAA found that there would be a surplus of 8 pitches throughout the County Borough by 2023, reducing to a surplus of 4 at the end of the plan period (2031). The need to 2024-2025 was however revised to a surplus of seven pitches, due to household reformations. Consequently, the previous GTAA found that there was no requirement for additional pitches over the life of the Plan.

6.16 It should also be noted that the GTAA did not identify any Travelling Showpeople, meaning that there was no immediate or future need. Furthermore, the assessment and associated surveys with the Gypsy and Traveller communities did not highlight a need for a Transit Site within the County Borough.

6.17 Since the adoption of the LDP, the Welsh Government has published draft guidance in relation to undertaking GTAAs. The draft guidance proposes several changes, inclusive of:

- Updating references to those parts of the *Housing (Wales) Act*, which came into force in 2015.
- Updating references to the *Anti-racist Wales Action Plan*.
- Providing clarification on the descriptions of different Gypsy and Traveller sites.
- Providing a larger focus on assessing and meeting the communities' need.
- A need for engagement, with greater emphasis placed upon meaningful consultation with Gypsy and Travellers residents.
- Provision of stipulated formulas to calculate need.

6.18 It is envisaged that revised guidance will be finalised and published by the Welsh Government in 2026/2027. The proposed changes outlined above, alongside any further amendments, will require consideration as part of the LDP review.

6.19 *Policy SW8: Gypsy, Traveller and Showpeople Accommodation*, is the mandatory criteria-based policy for the LDP. Whilst it advocates a preference for Gypsy and Traveller accommodation needs to be met on the Glynmil site, it nonetheless acknowledges that there may be a desire for private sites elsewhere within the County Borough. Consequently, in line with Annex B of *Circular 005/2018* (concerned with accommodation provision for Gypsy and Travellers), the policy has very few criteria that would prohibit the development of new private sites. Paragraph 12 of the Circular further supports an increase in the number of private sites, which have the potential to release pitches on public sites for those most in need. As such, it is felt that the objective of the criteria-based policy remains wholly appropriate however it will be re-assessed as part of the review of the Plan.

6.20 Overall, there are several factors that will need to be given due consideration, as part a review of this topic area. Primarily the data within the latest GTAA is outdated and a new study is required, with a needs assessment covering the whole plan period. Additionally, the Welsh Government has recently commissioned research in relation to regional transit provision, with the report expected to reach completion during 2026. The findings will need to be incorporated into the Evidence Base, with local policy reflecting the outcomes, where necessary. Likewise, the updated guidance contained with the *Development Plans Manual (ed. 3)* and new draft guidance *Undertaking Gypsy and Traveller Accommodation Assessments*, means that further consideration of this topic area is essential to meet the needs of the Gypsy and Traveller communities, now and into the future.

### **Planning Obligations**

6.21 Existing LDP policy seeks to ensure that new development is accompanied by an appropriate level of infrastructure to support the growth and development of the County Borough. This is achieved by securing contributions through Section 106 of the *Town and Country Planning Act 1990* (as amended) or via levy receipts under the *Community Infrastructure Levy Regulations (CIL) 2010* (as amended).

6.22 The Community Infrastructure Levy (CIL) was adopted in MTCBC on the 2<sup>nd</sup> June 2014 and limits the scope of community infrastructure types that can be secured through S106 planning obligations. Following the adoption of CIL, planning obligations are primarily limited to the provision of affordable housing (on-site and financial contributions) and on-site provision of open space on sites of ten or more dwellings. Moreover, CIL covers highway improvements, strategic drainage, education provision, strategic waste management infrastructure, leisure improvements and facilities and public transport infrastructure. It is essential that there is no 'double counting' in relation to securing obligations.

6.23 The AMR indicates that the LDP has been largely successful in securing affordable housing via S106 since the adoption of the Plan. Despite viability being marginal within the County Borough, the delivery of affordable housing through S106 contributions has resulted in the securing of 112 units, up to March 2025. Therefore, the target of 118 units by March 2026 remains achievable. The delivery of open space has been more intermittent, as indicated in the section below regarding open space. Therefore, *Policy SW9: Planning Obligations* will require review, to ensure that contributions remain appropriate and do not exacerbate viability issues in combination with CIL.

### **Open Space**

6.24 The AMR indicates inconsistency in the delivery of public open space via the Community Infrastructure Levy (CIL) and/or Section 106 (S106) contributions. This method of provision is largely contingent on the successful delivery of housing or housing-led development within the County Borough (sites of ten or more dwellings). Private developers typically pay CIL on qualifying development

or otherwise, where applicable, enter into a S106 agreement to provide on-site open space. Since the adoption of the LDP, AMR results highlight that only two priority open spaces have benefitted from CIL/S106, over the plan period. As such, the trigger point has been met, requiring further assessment to establish the efficacy of the existing policies for open space.

- 6.25 In addition to the review of existing LDP policies, the Council's Open Space Strategy will also require review. The existing Open Space Strategy contains a comprehensive audit of 139 sites within the County Borough, totalling 493 hectares (ha) of publicly accessible open space. This equates to 8.38ha of public open space per 1,000 of the population. Furthermore, the study assesses the proximity of residents to the nine identified open space typologies, as well as assessing the accessibility, quantity and quality of open space on a ward basis. The study evidences a shortfall in a number of typologies, with certain wards experiencing better access than others. Overall, the study indicates a need for additional open space within the County Borough. The *Open Space Strategy* was produced in June 2016 meaning that the data is now outdated and requires revision, to ensure that it effectively contributes to health of residents.
- 6.26 The revised *Open Space Strategy* will be a key component of the LDP evidence base and a principal consideration of the LDP Strategy, ensuring residents' well-being via access to quality open space. It will also ensure a coordinated approach to the spending of funds secured through CIL. It is however noted that the requirement to produce a Green Infrastructure Assessment (GIA), as stipulated in *Planning Policy Wales (ed.12)* and the *Development Plans Manual (ed.3)*, will need to be considered alongside the revision to the *Open Space Strategy*. The Welsh Government, through the aforementioned planning documents, requires the strategic planning and mapping of Green Infrastructure, ensuring that it is integrated into new development from the outset. There is a requirement to keep the quantity of Green Infrastructure under review and provide a net benefit for biodiversity. There is an opportunity to produce both studies in tandem to maximise their benefit and effectiveness, which will be explored as part of the review process.
- 6.27 In relation to the protection of Open Space, the AMR shows that the *Policy SW10: Protecting and Improving Open Spaces* is operating effectively. No applications have been permitted contrary to the policy, meaning that there has not been a loss of open space. It is acknowledged that applications were made on areas of designated open space however these resulted in improvements to access and did not exacerbate public access. Despite the efficacy of this policy, it will nonetheless require review, in line with the national policy and legislative changes witnessed since the adoption of the LDP.

## **Improving the Transport Network**

- 6.28 *Policy SW12: Improving the Transport Network* focuses on a modal shift towards sustainable transport, inclusive of the enhancement of pedestrian, cycle, rail and bus facilities. It requires development proposals to evidence how they will reduce the need to travel by private vehicle and encourage the use of sustainable modes

of transport. The policy was principally concerned with improving bus and rail facilities within the County Borough but also explicitly details active travel integrated network route maps and safeguarding land for the dualling of the Heads of the Valleys.

- 6.29 The AMR suggests that the LDP is performing well in relation to its transport indicators. The new central bus station for the town centre has been built, in line with Policy SW12.2. Furthermore, all major applications have been accompanied by a Travel Plan, in addition to the levels of NO<sub>2</sub> within the designated Air Quality Management Area (AQMA) remaining below the 40µg/m<sup>3</sup> target. The only area identified as meeting the trigger point is the failure to adopt Supplementary Planning Guidance (SPG) on Parking Standards. It is however noted that since the adoption of the LDP, there have been significant changes to the policy and legislative context, which need to be considered.
- 6.30 The requirement for Local Authorities to produce a transport plan is set out in the *Transport (Wales) Act, 2006*. Prior to the commencement of the Merthyr Tydfil First Replacement LDP, the second Regional Transport Plan (2015-2031) was produced by the five South East Wales Valleys Local Authorities of Blaenau Gwent, Caerphilly, Merthyr Tydfil, Rhondda Cynon Taf and Torfaen. On the 30<sup>th</sup> of June 2022, this duty was transferred to the Corporate Joint Committees (CJCs) by the *Local Government and Elections (Wales) Act, 2021*. Consequently, in June 2025, the Cardiff Capital Region (CCR) published the CCR Transport Plan (2026-2031).
- 6.31 The CCR transport plan focuses on creating an efficient, sustainable, low-carbon network in service to the region's 1.5million residents. The principal element of the plan involves a modal shift from private vehicles, achieved by establishing an affordable, accessible, greener transport network. It is anticipated that such action will improve residents' quality of life and contribute to a fairer, more resilient and greener economy. Other key elements of the document include improving and enhancing connectivity across the region and between communities. In addition, it aims to support the region's net-zero targets, by decarbonising the regional transport system, acknowledging it is a primary source of carbon emissions.
- 6.32 Although the First Replacement LDP included a policy regarding the modal shift away from private vehicles, in line with the Transport Hierarchy contained in *Planning Policy Wales (PPW) edition 10*; the policy position contained within PPW ed.12 is more robust. The policy within PPW 12 has been influenced by the 2021 Wales Transport Strategy, *Llwybr Newydd* and the 2023 Roads Review. As such, the transport policy within the LDP will need to be reviewed to account for these changes in policy and guidance, at national level. For example, future policy will need to reflect targets from *Llwybr Newydd* for at least 45% of journeys to be made by sustainable modes of transport, by 2040.
- 6.33 Despite the existing policies performing well within the context of the LDP, it is concluded that they will require review in line with the contextual changes to planning policy, as outlined above. This will ensure that they reflect the general ethos and direction of the national and regional transport agenda, mirroring the

aims, objectives and policies outlined in national planning policy and national and regional transport strategies.

## **Community Facilities**

6.34 The First Replacement LDP has been successful in protecting community facilities. No permission has been granted contrary to policy, that would result in the loss of a community facility in an area of need. The trigger point of the loss of one community facility in an area of need, in any one year, has not been met and all applications were compliant with policies AW13, SW3 and SW5. Consequently, it is considered that this policy is working effectively, however it will be considered further during the review process, to ensure that it remains relevant and compliant with policy, guidance and legislation released subsequent to the publication of the LDP.

## Cultural Policies

### **The Historic Environment**

6.35 The indicators within the most recent AMR suggest that the plan is performing well in terms of the historic environment. All applications permitted have been policy compliant and have evidenced that they would preserve or enhance Registered Landscapes, Parks and Gardens, Scheduled Ancient Monuments (SAMs), Conservation Areas and/or Listed Buildings. Additionally, all applications permitted have had regard to special characteristics and the archaeological importance of Urban Character Areas and or Archaeologically Sensitive Areas.

6.36 Despite this, it is worth noting that there have been significant changes in the context of the historic environment legislation. *The Historic Environment (Wales) Act 2023* came into full effect in November 2024 and is concerned with the effective protection of the historic environment, although it does not change the way in which it is managed. The aim of the Act is to preserve Wales's historic environment and assets, to ensure that they contribute to the well-being of the country and its people. The Act and its suite of secondary legislation, replaces previous legislation inclusive of the *Ancient Monuments and Archaeological Areas Act 1979* and the *Planning (Listed Buildings and Conservation Areas) Act 1990*. Notwithstanding the performance of the indicators within the AMR, it is conceded that modifications to and the consolidation of the Historic Environment legislation needs to be observed in revised policy, to account for the changes and the strengthening of the terminology applied.

## Environmental Policies

### **The Natural Environment**

6.37 The LDP contains safeguarding policies on nature conservation and eco-system resilience (EnW1), internationally and nationally protected sites and species

(EnW2) and local designations/priority habitats and species (EnW3). Following the adoption of the LDP, in January 2021 the Welsh Government amended the terminology around European sites (Natura 2000), which are now known as the National Site Network. The change was a result of the UK's decision to withdraw from the European Union. The terminology within the LDP policies will need to be updated to reflect the present lexicon.

6.38 The AMR proves that LDP policy has been successful in protecting the natural environment. The indicators show that no applications have been approved that would cause harm to the overall conservation value of Sites of Importance for Nature Conservation (SINCs), Regionally important Geological Sites (RIGS) and Local Nature Reserves (LNRs). Additionally, no applications have been approved that would cause harm to legally protected species or habitats, nor have there been any applications granted contrary to policy EnW1. It is acknowledged that the natural environment policies will require a degree of modification to strengthen the emphasis on biodiversity enhancement, reflecting national policy, guidance and legislation. This will be addressed as part of the LDP review process.

6.39 *Planning Policy Wales (ed. 12)*, alongside the Biodiversity and Geodiversity policy contained within *Future Wales* strengthen the function and import of biodiversity considerations, building on the enhanced biodiversity and ecosystem resilience duty introduced in the *Environment (Wales) Act, 2016*. This duty requires local authorities to seek to maintain and enhance biodiversity in the exercise of their functions. Furthermore, national policy as contained within *PPW 12* and *Future Wales* mandate that Green Infrastructure Assessments (GIA) and associated policy must safeguard and pinpoint opportunities for maximising existing (and future) Green Infrastructure. Consequently, LDP policy will need to be revised to reflect the national policy position and have due regard to Green Infrastructure. Green Infrastructure networks will incorporate a variety of spaces that will form a cohesive network of, for example, woodland, wetlands, parks, gardens, waterways (blue infrastructure) and green roofs. A Green Infrastructure Assessment and associated policy will need to be produced, as part of the replacement Plan.

## **Landscape Protection**

6.40 The LDP designates five Special Landscape Areas (SLAs) within the Plan. These being:

- SLA1: Nant Morlais & Cwm Taf Fechan
- SLA2: Winchfawr
- SLA3: Merthyr West Flank
- SLA4: Pontygwaith
- SLA5: Gelligaer and Taf Bargoed.

- 6.41 The landscapes above are non-statutory designations that have been identified using Natural Resources Wales (NRW) latest methodology. The character and local distinctiveness of the landscape features provide a sense of place and contribute to resident's well-being, in line with local well-being objectives. SLAs do not preclude development however the LDP contains a criteria-based policy to ensure that development conforms to the highest possible standards of design.
- 6.42 PPW 12 states that local planning authorities should provide for the conservation and where appropriate, enhancement of local landscapes. This may include policies for landscape features, characteristics and qualities of local significance, and the designation of SLAs. *Planning authorities should state which features, characteristics or qualities require extra protection and explain how the policy or designation will achieve this protection* (Welsh Government, p142, 2024). It is not considered that there have been any significant changes to the fundamental characteristics of the SLAs over the plan period however they will be considered further, as part of the LDP review.
- 6.43 The indicators within the AMR highlight that the LDP is performing well in relation to the protection of SLAs. The indicator monitors the number of applications approved contrary to Policy EnW5, which would cause unacceptable harm to the SLAs. The latest AMR shows that no applications have been approved contrary to policy. Where applications have been approved within or in close proximity to a designated SLA, they have been accompanied by the requisite evidence to demonstrate that there were no adverse impacts.

## Economic Policies

### **Employment**

- 6.44 The First Replacement LDP allocated employment sites at the following locations:
- Hoovers Strategic Regeneration Area – 1.5ha (net)
  - Goatmill Road – 14.75ha (net)
  - Ffos-y-Fran – 11.3ha (net)
  - South of Merthyr Tydfil Industrial Estate – 3.1ha (net)
- 6.45 The latest data contained within the AMR indicates that only 0.6ha of the 30.65ha allocated for employment has been developed. This is significantly below the targets stated within the AMR of 4.82ha by April 2021 and 9.46ha by April 2026. The 0.6ha development comprised the construction of fourteen industrial units at Pant Industrial Estate at Paisley Business Park. Whilst it is acknowledged that employment developments do not typically progress on an incremental basis, the

lack of investment into the County Borough over the plan period to date suggests that the allocations are potentially out of step with the market. Undelivered allocations will be assessed as part of the review procedure and may result in certain existing allocations not being a feature of the Replacement LDP, although this is currently conjecture and evidence will be required to support any such decisions. The status of each employment allocation can be found at Appendix B.

- 6.46 As a result of the aforementioned development at Pant Industrial Estate; 125 Class B jobs were delivered during 2024-2025, bringing the total number of jobs from the start of the plan period to the 31<sup>st</sup> of March 2025, to 243 Class B jobs. This figure is significantly below the targets of 626 Class B jobs by March 2021 and 1,251 by March 2026. There would need to be a substantive change in circumstances to achieve the stipulated targets, consequently this area of the plan will need to be reviewed. Additionally, the employment land requirement will also need to be reconsidered, taking into account the small projected decrease in the working aged population and the lack of delivery on allocated sites.
- 6.47 In spite of a potential over-supply of employment land, the policies within the plan have been very successful in safeguarding employment uses for employment purposes. Proposals for alternative uses must demonstrate that the existing use is inappropriate or surplus to the requirements of the market. Where it is claimed that uses are surplus to market requirements, it must be substantiated with viability and marketing evidence. This applies to all existing and allocated sites displayed on the proposals map. The policy also offers a degree of protection to those sites outside the identified existing sites. This issue should be considered further, as part of the LDP review, as employment units are a scarce resource that are difficult to replace, once lost. It is however acknowledged that future policy will need to assess those sui generis uses akin to Class B employment uses, to consider the prospect of introducing a degree of flexibility for such complementary proposals, where appropriate. The issue will need to be considered in further detail, being mindful of the fact that complementary uses cannot count toward the employment land supply.
- 6.48 As part of the LDP review process, it will be necessary to commission an Employment Land Review (ELR), to establish the level of need within the County Borough and if required, provide sites for growth/inward investment opportunities. As alluded to, it will be essential that the employment study takes account of the housing requirement and population projections. The alternative growth scenarios detailed within the *Development Plans Manual (ed. 3)* encourage consideration of a variety of options, based on assumptions, both for jobs and homes (Welsh Government, p112, 2020). These include demographic-led, affordable housing led, jobs-led, dwelling-led and policy-led scenarios. These will need to be considered further as part of the future ELR study.

## **Retail**

- 6.49 The assessment of retail need for the First Replacement LDP was informed by the *Merthyr Tydfil Retail and Commercial Leisure Study* in June 2017. The study provided the requirements for convenience and comparison retail floorspace

over the entire plan period. The need for convenience floorspace was found to be minor, at 409sqm (to 2031), with capacity for a moderate 2,802sqm (net) of comparison floorspace needed towards the end of the plan period (2031). Consequently, it was concluded that there was no need for stand-alone retail allocations. Given that the study only covers the period up to 2031, a new retail study will be required to forecast retail need for the entirety of the revised LDP period. This will determine capacity within the market and dictate the potential need for additional retail floorspace.

- 6.50 Given the identified need within the study, it was decided that as part of the Hoovers Strategic Regeneration Area (HSRA), 400sqm of convenience floorspace should be allocated, as part of this housing-led mixed-use scheme. Furthermore, as part of the new central bus station scheme at Swan Street, a café and takeaway coffee shop have been developed. A study is required to take account of more recent developments and ascertain what remains likely to be developed and where capacity still exists.
- 6.51 It is worth noting that the County Borough has a significant amount of out-of-centre retail provision in the form of Cyfarthfa Retail Park, Dowlais Retail Park (Pengarnddu), Pentrebach Retail Park (at Triangle Business Park) and Trago Mills. The majority of these facilities have a large number of national retailers present and provide a different commercial offer to Merthyr Tydfil Town Centre. Cyfarthfa and Trago Mills have a significantly larger than local draw, making Merthyr Tydfil the premier shopping destination within the Heads of the Valleys area, supporting a substantial number of jobs. The Lichfields study indicates a high convenience and comparison retention rate within the County Borough of 73% and 85% respectively (Lichfields, p22, 2017). An updated study is required to account for the performance of Trago Mills, which opened after the study was produced.
- 6.52 The Retail Hierarchy within the County Borough consists of Merthyr Tydfil Town Centre as the Principal Centre, which is supported by the following local centres: Dowlais, Gurnos, Cefn Coed and Brecon Road/Morgantown, Troedyrhiw, Aberfan, Treharris. The AMR suggests that all centres are performing well, with a collective vacancy rate of 16%. Merthyr Tydfil Town Centre had a vacancy rate of 16.9% in 2024-2025, which was below the Welsh average (in accordance with data produced by the Welsh Retail Consortium and the Local Data Company). This is also down on the vacancy rate of 18.6% quoted within the 2017 retail study.
- 6.53 Despite the retail indicators performing well within the AMR, it is noted that a study is required to assess efficacy of the current policy approach and provide guidance on future policy direction. This is particularly important in view of the changes to guidance and legislation over the last five years. Post COVID-19, the Welsh Government encourages a diversification within town centres, so they become 'hubs' for the communities that they serve. It is anticipated that this approach will improve their economic output and continue to attract visitors into the centres. Moreover, it will help to combat against rising vacancy rates and the Wales-wide trend for decline in the number of Class A1 and A2 units. A study is required to assess this approach against the protectionist policy witnessed within

the adopted LDP. Within the Primary Shopping Area (PSA) of Merthyr Tydfil Town Centre, the percentage of Class A1 retail units has consistently remained above the 75% trigger point. This suggests that diversification, as advocated in *Building Better Places* could impact upon the vitality and viability of the centre. This issue will need to be considered further.

## **Tourism, Leisure and Recreation**

6.54 The 2017 study undertaken by Lichfields also included an in-depth look at commercial, leisure and recreational uses. The study found that there was theoretical capacity within the County Borough for:

- A 3-5 screen cinema.
- 100 fitness stations for health and fitness facilities.
- One bingo hall.
- Food and beverage outlets: 1,235sqm to 2026 and 2,136sqm to 2031.

6.55 This suggests that there is capacity within the Borough up to 2031, however an up-to-date study is required to establish whether this remains the case, as well as to forecast beyond the existing plan period, into the early 2040s.

6.56 AMR indicators in relation of leisure and tourism uses appear to be performing well, with no loss of leisure or tourism facilities, as a consequence of applications granted planning permission.

6.57 In 2015, MTCBC developed a Destination Management Plan (DMP), to depict how tourism should grow within the County Borough over a four-year period. The DMP employed several strategies in a bid to increase tourism, including destination marketing, activity tourism development, town centre development, visitor economy, event management, training, perception change, quality accommodation and local and regional tourism development. It is anticipated that an updated DMP will be published later in 2026, which will need to be considered as part of the LDP review process.

6.58 Prior to the COVID-19 global pandemic, tourism in Merthyr Tydfil witnessed a steady increase in economic growth, year on year. Between 2014 and 2019, the economic impact increased from £63.5m to £103.09m, the number of visitors annually went from 1.21m to 1.71m and the number of people staying within the County Borough increased from 160,000 to 210,000. These outputs plummeted, as a result of the pandemic, however as of 2022, there were signs of recovery. The economic impact rose to £113.4m, annual visitors reached 1.58m and staying visitors reached to 200,000. The County Borough is also becoming increasingly popular as an Air BNB location. Any future study will need to look closely at the growth in tourism within the County Borough and the Council will need to continue to encourage growth within the tourism sector. Merthyr Tydfil's rich industrial heritage should continue to be central to the tourism agenda.

## Renewable Energy

- 6.59 *Policy EcW8: Renewable Energy* is the criteria-based policy for renewable energy development within the adopted LDP. The policy supports various forms of renewable energy development, subject to several criteria. Whilst most remain relevant, certain criteria will require revision to reflect the changes in national policy, as detailed below, inclusive of demonstrating a net benefit for biodiversity.
- 6.60 *Policy EcW9: District Heating* identifies heat priority areas where the development of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged. This technology is encouraged by the Welsh Government, with the second update of their biannual renewable energy recommendations containing a target of 5.5GW of renewable energy capacity to be provided by heat pumps by 2035. It is worth mentioning that this target was not incorporated into the *Energy Use in Wales* report, as it is contingent on funding from the UK government and other viability issues concerning the cost of the technology. As such, the evidence behind this policy will need to be updated and analysed to reflect the changes at national level and concerns regarding the affordability of the technology.
- 6.61 The AMR highlights the efficacy of local renewable energy policy, as contained within the adopted LDP. The capacity indicator contained a target of securing 12.5MWe of electricity generation from renewable energy developments by 2021 and 25MWe by 2026. The target for 2021 has been met, with current capacity at 16.2MWe. Whilst this contributes towards the 2026 target, it does not meet it, although it remains above the trigger point of 14.33MWe. Furthermore, the heat capacity indicator contained a target of securing 13.27MWth heat generation by 2021 and 26.53MWth by 2026. The current installed capacity stands at 6.86MWth, meaning that whilst the trigger point of 6.5MWth was not met in 2021, it is likely that the sixth AMR for 2025-2026 will hit the trigger point. As such, it will need to be established why the heat capacity target is not being met.
- 6.62 The policy contained within the adopted LDP was based on the Welsh Government's renewable energy generation targets for Wales, 2017. The *Energy Use in Wales* (third edition) report, published in 2024, updates these targets, to:
- Produce 100% of our electricity needs from renewable resources by 2035.
  - Ensure that at least 1.5GW of renewable energy capacity is locally owned by 2035.
- 6.63 Furthermore, the policies in the adopted plan were based around the national policy contained within *Planning Policy Wales* (ed. 10). Revisions to PPW (now ed. 12) have introduced more stringent requirements to achieve net-zero targets and address the climate emergency. PPW 12 also includes requirements for renewable energy projects to demonstrate a net benefit for biodiversity.

- 6.64 The changes to policy, guidance and legislation within this topic area have been significant. The revocation of Technical Advice Note (TAN) 8 *Planning for Renewable Energy*, which has been replaced by *Future Wales (2020-2040)* means that there are no longer Strategy Search Areas for wind energy development. *Future Wales* instead identifies pre-assessed areas deemed to be acceptable for wind energy, having already assessed their impact on the landscape. Merthyr Tydfil does not fall within these pre-assessed areas however this does not mean that capacity for smaller renewable energy developments does not exist. Capacity will need to be assessed as part of the LDP review.
- 6.65 It should be noted that all onshore proposals with a generation capacity between 10MW and 350MW, are now under the jurisdiction of the Welsh Ministers, with Local Planning Authorities only permitted to determine proposals below the 10MW capacity threshold. Therefore, it will be important to commission a study to assess potential areas for smaller-scale renewable energy development within the County Borough, which will help to inform future LDP policies and proposals. It is imperative that future policy addresses a need to reduce energy demand and promotes energy efficiency. The issues detailed above will need to be considered further, as part of the LDP review.

## **Minerals**

- 6.66 The adopted First Replacement LDP utilised the Regional Technical Statement (RTS) first review (July 2014) to inform the policies within Plan. The RTS provides updated recommendations to mineral planning authorities regarding the amount of aggregate that needs to be provided from each local authority area (apportionments), as well as the total tonnage of any new allocation that may be required within the LDP, to ensure adequate provision.
- 6.67 The joint apportionment recommendations for the provision of land-won primary aggregates in Merthyr Tydfil and (then) Brecon Beacons National Park was 0.82 million tonnes per annum of crushed rock. This equated to 20.5 million tonnes of crushed rock over a period of twenty-five years (to 2036). As such, the adopted LDP contains no allocations, as a ten-year landbank could be evidenced.
- 6.68 Since the adoption of the LDP, *The Second Regional Technical Statement (RTS)* on Aggregates has been published (September 2020) and covers a twenty-five-year period up to 2041. The document was produced on behalf of the North and South Wales Regional Aggregate Working Partnerships (RAWPs), by Cuesta Consulting Ltd. and is kept under review every five years.
- 6.69 Regarding the joint apportionment of future primary won aggregates for Merthyr Tydfil and Bannau Brycheiniog National Park, the overall preferred apportionment for sand and gravel and crushed rock is 0.567 million tonnes per annum (mtpa). The total joint apportionment required over the twenty-five years is 14.175 million tonnes (mt) and the existing landbank evidences a 211.8 year, with a surplus of 105.925mt.

- 6.70 Furthermore, the AMR indicators evidence that the existing LDP is performing well and maintaining a minimum ten-year landbank. With the latest evidence suggesting a 211.8-year land bank, there is presently no concern regarding provision. This, alongside the scheduled review of the Second RTS, will need to be considered further during the LDP review process, to ensure that the Plan is based on the most up-to-date evidence.
- 6.71 It should also be noted that the opencast mining operations to remove 11 million tonnes of coal, at the Ffos-y-Fran site, concluded in 2023. Following commencement of works on the First Replacement LDP, the Welsh Government via national policy removed the requirement to safeguard coal mineral resource areas. Planning Policy Wales (ed.12) is clear that proposals for deep-mine, opencast or colliery spoil disposal should no longer be permitted. Consequently, any future LDP safeguarding or criteria-based policy will need to be revised to ensure that references to coal are removed. It will also require removal from the Proposals Map.

## **Waste**

- 6.72 The waste policy contained within the AMR is concerned with waste facilities and the criteria where they would be deemed acceptable. It also stipulates those areas within the County Borough, which are the preferred areas of search for waste management facilities. The policy framework contained within the LDP was compiled following the publication of the Welsh Government's waste strategy *Towards Zero Waste – the Waste Strategy for Wales* (2010), as such it takes account of the waste hierarchy.
- 6.73 In 2021, the Welsh Government published *Beyond Recycling – A strategy to make the circular economy in Wales a reality*, which contains eight headline priorities to reduce waste further. These include phasing out unnecessary single-use plastics, eradicating avoidable food waste and striving to achieve the highest rates of recycling in the world. Alongside this, the Welsh Government also published the *Strategic Assessment for the future need for energy from waste capacity in the three economic regions of Wales* in 2021. The document confirms the moratorium on future large-scale (greater than 10MW installed capacity) energy from waste developments. Moreover, it replaces the strategic assessment for the new energy from waste capacity provided in section 2.3.4 of the *Collections, Infrastructure and Markets Sector Plan* published in 2012, which is the starting point for the determination of need for future capacity. The LDPs waste policy will need to be reconsidered to reflect the contextual changes identified above. There will need to be a stronger emphasis on minimising waste and contributing to the circular economy, in line with the aforementioned documents.

6.74 Whilst the AMR indicates that the County Borough is performing well in terms of its capacity to cater for waste generation, the changes outlined above are deemed to be significant enough to necessitate a review of waste policy.

## Section 7 – Evidence Base Requirements

- 7.0 The Council will need to update several elements of the LDP Evidence Base to inform the preparation of a replacement plan. This will involve compiling/commissioning new evidence and updating various other studies, where appropriate. This approach will ensure compliance and conformity with the most recent national plans, policies, guidance, strategies and legislation, as outlined in Section 3 of this report.
- 7.1 The table below provides a list of the studies, plans and assessments likely to be required, alongside the rationale for the evidence. The list below is not definitive and should not be interpreted as such. It is acknowledged that the requirement for additional new or updated evidence may emerge, as the replacement LDP progresses.

New/Updated Evidence Required	Rationale
Local Housing Market Assessment (LHMA)	The study requires updating to forecast demand and to evidence the housing requirement over the plan. It will also inform the Strategy, affordable housing need and policy.
Gypsy and Traveller Accommodation Assessment (GTAA)	Provide an updated assessment of accommodation needs for Gypsies and Travellers over the entire plan period, to inform LDP provision. Any identified unmet need must be provided for.
Population and Housing Requirements Paper	An assessment will be necessary to establish the existing and likely population growth over the plan period. This will be necessary to establish the housing requirement.
Settlement Hierarchy Paper/ Settlement Assessment	This is necessary to assess the role and function of existing settlements. It will also identify issues such as whether settlements have insufficient or surplus: capacity, services and facilities, access to green and play space, community facilities, educational opportunities and the like. This will be used to inform the LDP Strategy, policies and proposals.
Viability Assessment	The plan requires an up-to-date, high-level viability assessment of potential housing and other allocations, to ensure that they are viable and deliverable. This will inform the LDP's Strategy, allocations and policies.
Employment Land Review (ELR)	An ELR will be required to assess the supply of and demand for sites for employment purposes. It will involve property market assessments, auditing existing and allocated sites, assessing past trends and labour demand to forecast need and make policy recommendations. This will inform the LDP's Strategy and policies.

Retail Study (incorporating commercial leisure and recreational opportunities).	This Study will be multi-faceted, identifying retail need for potential additional floorspace requirements, a review of the retail hierarchy inclusive of the Primary Shopping Area and capacity for leisure services and facilities (wider than Class D2).
Green Infrastructure Assessment (GIA)	A GIA is necessary to provide an inventory of existing Green Infrastructure within the County Borough, as well as ecological networks and assets; all of which require mapping. This will be used to inform the LDP Strategy, proposals and policies.
Open Space Assessment	An Open Space Assessment will assess the current provision of open space and its quality and accessibility. It will also identify areas that require protection and identify opportunities for future provision. This study will inform LDP policies and proposals.
Infrastructure Plan	This study will highlight the level, quantum, capacity, location and timing of the infrastructure deemed necessary to support the development and delivery of the LDP.
Integrated Sustainability Appraisal (ISA), inclusive of Sustainability Appraisal/ Strategic Environment Assessment and Habitat Regulations Assessment	The ISA will provide a comprehensive assessment and evaluation of the social, environmental, cultural and economic impacts of the emerging LDP and its associated policies. The study will also look at impacts upon the Welsh language. The HRA will determine whether the LDP or a specific proposal or policy therein, could significantly harm a site within the National Site Network.
Renewable Energy Assessment	A study is required to establish the potential for renewable energy developments of less than 10MW within the County Borough. This will involve identifying the most appropriate technologies and locations, to inform LDP policies and proposals.
Strategic Flood Consequences Assessment (SFCA)	SFCAs are required to assess present and future flood risk. The SFCA will be a significant factor in selecting potential allocations and informing LDP policy.

7.2 Given that the vast majority of Local Planning Authorities are at different stages of plan preparation, much of the evidence compiled and/or commissioned will look at the larger than local, cross boundary issues, which could impact on upon requirements, need, provision or delivery of the LDP.

## **Section 8 – Review of Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA)**

8.0 This section looks at the Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) within the context of the LDP review process.

### **Sustainability Appraisal (SA)/Strategic Environmental Assessment (SEA)**

- 8.1 The *Planning and Compulsory Purchase Act 2004 S. 39 (2)* and *SEA Regulations 5(2) and 5(4)* mandate a statutory requirement to produce a Sustainability Appraisal and Strategic Environmental Assessment to provide the rationale for spatial and policy choices. Whilst the scope of the SEA is limited to the environmental effects of the Plan, the SA has a broader remit covering social, economic and cultural well-being effects (in addition to environmental). The *Development Plan Manual (ed.3)* is clear that the requirements of the SEA Regulations are best incorporated into a Sustainability Appraisal to avoid unnecessary repetition.
- 8.2 The previous SA/SEA was undertaken between 2016-2018 and included a review of plans, policies and programmes, as well as baseline data to inform the adopted LDP. As part of the replacement LDP process, the current SA/SEA framework will be reviewed; this will include the monitoring framework to account of the contextual changes within national policy, guidance and legislation, in addition to changes and updates to the baseline information.
- 8.3 The findings of the SA monitoring process are summarised annually, via the monitoring of 18 sustainability objectives contained within the AMR. This provides an indication of the impacts of the implementation of LDP policies and help to determine whether they are contributing to the achievement of sustainable development. It is acknowledged that there have been difficulties in qualifying indicators that underpin the sustainability objectives. Therefore, the AMR restricts evaluation to commentary only, in contrast to the ‘traffic light’ system employed elsewhere. This approach allows for an evolving baseline, although it is accepted that a review provides the opportunity to refine the sustainability objectives for the LDP. As a result of this, as well as the duration of time that has elapsed since the initial baseline of 2016-2018 and contextual changes; it is imperative that a review is undertaken to ensure that these elements are updated.
- 8.4 Additionally, the review will need to consider the recommendation within the *Development Plan Manual (ed. 3)* of an Integrated Sustainability Appraisal (ISA) in preparing the LDP. The integration of the Well-being of Future Generations Act, Equalities Act, Welsh Language, Health Impact Assessment and the Environment Act (Section 6) (where relevant) will ensure a more holistic, transparent and well-rounded assessment of the “*sustainability implications of growth options, objectives, policies and proposals,*” (Welsh Government, p63,

2020). This will need to be form part of deliberations to establish whether it is the most appropriate approach.

### **Habitats Regulations Assessment (HRA)**

- 8.5 The *Development Plan Manual (ed. 3)* stipulates that the HRA should not be integrated into the SA, as it uses a different precautionary testing mechanism. The SA should however summarise the HRA findings, as part of its assessment of its effects on biodiversity.
- 8.6 The adopted LDP was subject to a HRA to ascertain whether its implementation would have any impacts on any European sites of nature conservation importance (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites), close to Merthyr Tydfil. Whilst Merthyr Tydfil does not have any European sites within the administrative area, the HRA screening assessment focuses on the ten sites within 15km of the County Borough.
- 8.7 Further to the *Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019*, the European Union's Natura 2000 ecological network no longer includes SACs and SPAs within the United Kingdom. In its place, a National Site Network (NSN) has been created, which includes SACs and SPAs. Ramsar sites, designated under the *Ramsar Convention on Wetlands of International Importance*, have not been incorporated in the NSN and will not form part of the HRA. The planning system nonetheless treats Ramsar sites in the same way as SACs and SPAs.
- 8.8 The adopted LDP will be subject to HRA, which will necessitate both the HRA screening process and methodology to be reviewed. The HRA will continue to be an iterative process, running in parallel with the development of the LDP. It will ensure compliance with the relevant regulations and legislation, in addition to addressing the issues identified.

## Section 9 – Conclusions

- 9.0 The review of evidence in combination with the findings of the five AMRs published post adoption of the LDP, indicate that a full revision procedure should be employed in the preparation of a Replacement Plan. Therefore, the Replacement LDP will be prepared for the period 2026-2041, ensuring effective local decision-making beyond the adopted LDP's end date of 2031.
- 9.1 Whilst 71% of indicators are being met within the AMRs, increasingly indicators are beginning to fall short of their targets. Housing is one of the principal areas of concern, alongside employment land provision, heat generating renewable energy provision and priority open space. Housing and employment are particularly affected by external factors inclusive of COVID-19 and the wider stalling economy. Key aspects of the LDP Strategy have been affected by issues such as increasing development costs, increasing interest rates, inflation and the availability of mortgages impacting housing demand. These will need to be considered in the preparation of the Replacement LDP.
- 9.2 Furthermore, the LDP will require an update of the existing Evidence Base, including the compilation and commissioning of new studies. Such updates will ensure the most recent, robust evidence to inform the Replacement Plan. Updated evidence around population and household projections have been published since the adoption of the LDP. This evidence, in addition to the contextual changes to policy, guidance and legislation at national level highlight the need for a full review. The replacement Plan will result in revision to policies and allocations, as well as reconsideration of the Vision, Aims, Objectives and Strategy (growth and spatial).

## Appendix A – Annual Monitoring Report, Performance Summary

Appendix A provides an indication of the efficacy of LDP policy, as contained within the most recent Annual Monitoring Report, published in October 2025. The table provides a quick reference point, utilising the ‘traffic light’ system present within the AMR document.

<b>TABLE 1: MONITORING ACTIONS</b>		
Where indicators are suggesting the LDP Policies are being implemented effectively.	There is no cause for review.	Continue Monitoring
Where indicators are suggesting that LDP Policies are not being implemented as intended.	Further officer or Member training may be required.	Training Required.
Indicators may suggest the need for further guidance to be provided.  Where key sites are not coming forward as envisaged.	In addition to those already identified in the Plan.  The Council will actively engage with developers/landowners to bring forward Development Briefs to kick start the development process.	Supplementary Planning Guidance and or Development Briefs required.
Where indicators are suggesting the LDP Policies are not being as effective as they should.	Further research and investigations are required, which may include the use of contextual indicators and comparisons with other local authorities and national statistics where appropriate.	Policy Research Required.
Where indicators are suggesting the LDP Policies are failing to implement the strategy a formal review of the Policy is required.	Further investigation and research may be required before a decision to formally review is confirmed.	Policy Review Required.
Where indicators are suggesting the LDP strategy is failing and a formal review of the Plan is required.	This option to fully review the Plan will need to be fully investigated and undertaken following serious consideration.	Plan Review Required.

SUSTAINABLE POPULATION GROWTH					
LDP Objective 1: <i>To encourage a sustainable level and distribution of population growth.</i>					
WELSH LANGUAGE AND CULTURE					
LDP Objective 2: <i>To protect and enhance Welsh language and culture.</i>					
HOUSING PROVISION					
LDP Objective 3: <i>To ensure the sufficient provision of land for the delivery of a range and choice of housing and affordable housing to address local housing needs.</i>					
Policy Reference:		SW1, SW2, SW3, SW4 & SW5			
SA Objective Reference:		2, 3, 5, & 17			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
1.1	<u>Core</u> Housing land supply, taken from the current Joint Housing Land Availability Study (JHLAS) supply (TAN1).	Maintain a minimum 5-year housing land supply for each year following plan adoption.	N/A	Less than a 5-year supply of housing land recorded in any 1 year following plan adoption.	N/A  TAN 1 revoked March 2020
1.2	<u>Core</u> Overall number of housing completions.  (As indicated in the Housing Trajectory at Appendix 2 of the AMR).	260 completions by April 2019. 344 completions by April 2020. 524 completions by April 2021. 705 completions by April 2022. 913 completions by April 2023. 1076 completions by April 2024. 1263 completions by April 2025. 1446 completions by April 2026. 1621 completions by April 2027. 1775 completions by April 2028. 1953 completions by April 2029.	400 completions by April 2020. 477 completions by April 2021. 561 completions by April 2022 617 completions by April 2023 702 completions by April 2024 827 completions by April 2025	20% less or greater than the monitoring target over 2 consecutive years.	

		2106 completions by April 2030. 2250 completions by April 2031.			
1.3	<u>Core</u> Number of net additional new general market dwellings built in the Plan area.	260 completions by April 2019. 336 completions by April 2020. 494 completions by April 2021. 653 completions by April 2022. 841 completions by April 2023. 993 completions by April 2024. 1166 completions by April 2025. 1335 completions by April 2026. 1499 completions by April 2027. 1644 completions by April 2028. 1809 completions by April 2029. 1951 completions by April 2030. 2000 completions by April 2031.	345 completions by April 2020. 389 completions by April 2021. 455 completions by April 2022 494 completions by April 2023 531 completions by April 2024 601 completions by April 2025	20% less or greater than the housing targets over 2 consecutive years	
1.4	<u>Core</u> Number of net additional affordable dwellings built in the Plan area.	47 completions by April 2019. 61 completions by April 2020. 88 completions by April 2021. 115 completions by April 2022. 141 completions by April 2023. 154 completions by April 2024. 171 completions by April 2025.	55 completions by April 2020. 88 completions by April 2021. 106 completions by April 2022 123 completions by April 2023 171 completions by April 2024 225 completions by April 2025	20% less or greater than the affordable housing targets over 2 consecutive years.	

		190 completions by April 2026. 203 completions by April 2027. 214 completions by April 2028. 229 completions by April 2029. 242 completions by April 2030. 251 completions by April 2031.			
1.5	<u>Core</u> Total number of housing units permitted on allocated sites as a percentage of overall housing provision.	78% of housing units permitted on allocated sites as a percentage of overall housing provision.	26% of total housing units permitted were permitted on allocated sites.	20% less or greater than the monitoring target over 2 consecutive years.	
1.6	<u>Local</u> Total number of housing units completed on allocated sites.	228 completions by April 2019. 289 completions by April 2020. 470 completions by April 2021. 652 completions by April 2022. 868 completions by April 2023. 1028 completions by April 2024. 1218 completions by April 2025. 1403 completions by April 2026. 1577 completions by April 2027. 1726 completions by April 2028. 1904 completions by April 2029. 2051 completions by April 2030.	284 completions by April 2020. 344 completions by April 2021. 403 completions by April 2022 406 completions by April 2023 407 completions by April 2024 448 completions by April 2025	20% less or greater than the monitoring target over 2 consecutive years.	

		2196 completions by April 2031.			
1.7	<u>Core</u> Number of completions in Primary Growth Area (As indicated in the Housing Trajectory at Appendix 2 of the AMR).	221 completions by April 2019. 272 completions by April 2020. 372 completions by April 2021. 473 completions by April 2022. 607 completions by April 2023. 742 completions by April 2024. 889 completions by April 2025. 1045 completions by April 2026. 1177 completions by April 2027. 1281 completions by April 2028. 1408 completions by April 2029. 1534 completions by April 2030. 1600 completions by April 2031.	260 completions by April 2020. 278 completions by April 2021. 301 completions by April 2022 344 completions by April 2023 417 completions by April 2024 533 completions by April 2025	20% less or greater than the monitoring target over 2 consecutive years.	
1.8	<u>Core</u> Number of completions in Other Growth Area (As indicated in the Housing Trajectory at Appendix 2 of the AMR).	89 completions by April 2019. 121 completions by April 2020. 201 completions by April 2021. 281 completions by April 2022. 356 completions by April 2023. 384 completions by April 2024. 424 completions by April 2025. 452 completions by April 2026. 494 completions by April 2027. 544 completions by April 2028.	140 completions by April 2020. 199 completions by April 2021. 260 completions by April 2022 273 completions by April 2023 285 completions by April 2024	20% less or greater than the monitoring target over 2 consecutive years.	

		594 completions by April 2029. 620 completions by April 2030. 650 completions by April 2031.			
1.9	<u>Local</u> Average house price (Baseline: 2019 average Source: Land Registry).	N/A – contextual indicator.	2019 average: £107,943. 2024 average: £145,599	+/- 10% change from base level.	
1.10	<u>Local</u> Average house price (Baseline: 2019 average Source: Land Registry).	N/A – contextual indicator.	2019 average gross weekly pay: £502.80. 2024 average gross weekly pay: £631.50	+/- 10% change from base level.	

REGENERATION					
LDP Objective 4: <i>To promote the suitable reuse of previously developed land and the continued regeneration of local communities.</i>					
Policy Reference:		SW6, SW7 & SW8			
SA Objective Reference:		5, 15 & 18			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
4.1	<u>Local</u> Amount of development permitted on previously developed land as a percentage of all development permitted (Ha). (NB. excluding householder development and changes of use).	Maintain a percentage of at least 75% of new development permitted on previously developed land over the plan period.	2023-2024: 91.6% of all development permitted on previously developed land.  2024-2025: 1.9% of all development permitted on previously developed land.	Less than 75% over 2 consecutive years.	
4.2	<u>Core</u> Meeting short-term needs for authorised Gypsy, Traveller and Showpeople sites to 2024.	Adequate provision is made to meet short-term for Gypsy and Traveller accommodation needs.	Short-term Gypsy and Traveller accommodation need being met.	Failure to meet the short-term Gypsy, Traveller and Showpeople accommodation needs to 2024.	
4.3	<u>Core</u> Meeting longer-term need for authorised Gypsy, Traveller and Showpeople sites to 2031.	Adequate provision is made to meet longer-term Gypsy and Traveller accommodation needs.	Longer-term Gypsy and Traveller accommodation need being met.	Failure to meet the long-term Gypsy, Traveller and Showpeople accommodation needs by 2031.	

INFRASTRUCTURE					
LDP Objective 5: To ensure that community infrastructure and open space supports the regeneration of local communities.					
Policy Reference:		SW9 & SW10			
SA Objective Reference:		1, 2, 4 & 9			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
5.1	<u>Local</u> Number of on-site affordable housing provision secured through S106/condition in association with new development.	59 units by March 2021.  118 units by March 2026.  177 units by March 2031.	112 affordable units secured by March 2025.	10% Requirement Area: delivering less than 7.5% or more than 12.5%.  5% Requirement Area: delivering less than 2.5% or more than 7.5%.	
5.2	<u>Local</u> Amount of Public Open space provision secured through S106/CIL in association with new development.	Net increase in open space (Ha).	2023-2024: 4.95ha increase in open space  2024-2025: 0ha net increase in open space	No net Bi-annual increase in open space (Ha).	
5.3	<u>Local</u> Number of Priority Public Open Space sites benefitting from S106/CIL in association with new development	5 sites by March 2021.  13 sites by March 2026.  21 sites by March 2031.	No further Priority Open Spaces benefitting from S106/CIL funding during the monitoring period.	Failure to improve Priority Open Space in accordance with trigger level.	

5.4	<u>Local</u> Number of applications approved that would result in the loss of Open Space.	No permission granted for development contrary to Policy SW10.	No applications were permitted contrary to Policy SW10.	1 or more planning permissions granted not in accordance with Policy SW10.	
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## SUSTAINABLE DESIGN

LDP Objective 6: To promote high quality, sustainable and inclusive design and support measures, which mitigate the predicted effects of climate, change.

Policy Reference: SW11 & EnW4

SA Objective Reference: 4, 6, 7, 10, 11, 13, 14 & 18

Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
6.1	<u>Local</u> Permissions granted not in accordance with Policy SW11 Sustainable Design and Placemaking.	No applications permitted contrary to Policy SW11.	No applications permitted contrary to Policy SW11.	1 application permitted contrary to Policy SW11.	
6.2	<u>Local</u> Amount of development permitted within C1 Floodplain areas that do not meet all TAN 15 tests.	No applications approved within C1 Floodplain areas unless all TAN 15 tests are met.	No applications approved within C1 floodplain that do not meet TAN 15 tests.	1 application permitted for development in any 1 year that does not meet all TAN 15 tests.	
6.3	<u>Core</u> Amount of development permitted for highly vulnerable development within C2 Floodplain area.	No relevant applications approved within C2 Floodplain areas.	9 applications for highly vulnerable development permitted in C2 floodplain.	1 application permitted in any 1 year for highly vulnerable development, within C2 Floodplain.	

TRANSPORT					
LDP Objective 7: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.					
Policy Reference:		SW12 & EnW4			
SA Objective Reference:		4, 8, 9 & 11			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
7.1	<u>Local</u> Development of the New Merthyr Tydfil Central Bus Station.	Start development by end of 2022.	Target Met.	Failure to meet monitoring target.	
7.2	<u>Local</u> Number of major applications accompanied by a Travel Plan, above the relevant Transport Assessment (TA) thresholds identified in TAN 18 (Annex D).	All relevant planning applications to be accompanied by a Travel Plan.	All relevant applications were accompanied by a travel plan.	1 or more relevant planning application not accompanied by a travel plan or secured by conditions.	
7.3	<u>Local</u> Preparation of Supplementary Planning Guidance (SPG) relating to Parking Standards.	To prepare a Parking Standards SPG within 2 years of adoption.	Initial scoping work has been carried out in regard to preparing a Parking Standards SPG.	Failure to prepare a Parking Standards SPG within 2 years of adoption.	
7.4	<u>Local</u> Number of Air Quality Management Areas (AQMAs).	No new or extended AQMA designations.	There have been no new or extended AQMA designations.	An extension to the existing AQMA or designation of a new AQMA.	

7.5	<u>Local</u> Nitrogen dioxide levels within the designated Twynyrodyn Road AQMA.	Reduce the number of locations above the statutory level for nitrogen dioxide within the AQMA.	All sites are well below the AQS objective of 40µg/m3.	Two consecutive years with no reduction in the number of locations above statutory nitrogen dioxide levels within the AQMA.	
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## COMMUNITY FACILITIES

LDP Objective 8: To support existing community facilities and suitable community led development

Policy Reference:		SW13			
SA Objective Reference:		1, 2, 4 & 17			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
8.1	<u>Local</u> Number of community facilities lost through development.	No permission granted for development contrary to Policy SW13 that has the potential to result in the unacceptable loss of community facilities in areas of need.	No applications permitted contrary to Policy SW13.	The loss of 1 community facility in an area of identified need in any 1 year contrary to Policy SW13.	

HERITAGE AND CULTURAL ASSETS					
LDP Objective 9: To protect, enhance and promote all heritage, historic and cultural assets					
Policy Reference:		CW1 & CW2			
SA Objective Reference:		16 & 18			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
9.1	<u>Local</u> Number of applications approved that do not preserve or enhance Registered Landscapes, Parks and Gardens, Scheduled Ancient Monuments (SAMs), Conservation Areas or Listed Buildings.	No permission granted for development contrary to Policy CW1 that has the potential to impact upon Registered Landscapes, Parks and Gardens, Scheduled Ancient Monuments (SAMs), Conservation Areas or Listed Buildings.	No applications permitted contrary to Policy CW1.	1 or more applications permitted contrary to Policy CW1.	
9.2	<u>Local</u> Number of applications approved that do not have regard to the special character and archaeological importance of Urban Character Areas and or Archaeologically Sensitive Areas.	No permission granted for development contrary to Policy CW1 that has the potential to impact on Urban Character Areas and or Archaeologically Sensitive Areas.	No applications permitted contrary to Policy CW1.	1 or more applications permitted contrary to Policy CW1.	

## BIODIVERSITY

LDP Objective 10: To improve ecosystem resilience and connectivity which support habitats and species of principle importance.

Policy Reference:		EnW1, EnW2 & EnW3			
SA Objective Reference:		11, 12, 13 & 15			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
10.1	<u>Local</u> Number of applications approved that would cause harm to the overall conservation value of Sites of Importance for Nature Conservation (SINCs), Regionally Important Geological Sites (RIGS) and Local Nature Reserves (LNRs).	No permission granted for development contrary to Policy EnW3.	No applications permitted contrary to Policy EnW3.	1 or more planning permissions granted not in accordance with Policy EnW3.	
10.2	<u>Local</u> Number of applications approved that do not have regard to the special character and archaeological importance of Urban Character Areas and or Archaeologically Sensitive Areas.	Number of applications approved that would cause harm to legally protected Habitats or Species.	No applications permitted contrary to Policies EnW2 or EnW3.	1 or more planning permissions granted not in accordance with Policies EnW2 or EnW3.	
10.3	<u>Local</u> Number of applications requiring enhancements to biodiversity interests	No permission granted contrary to Policy EnW1.	No applications permitted contrary to Policy EnW1.	1 or more planning permissions granted not in accordance	

	through mitigation and compensation measures.			with Policy EnW1.	
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COUNTRYSIDE AND LANDSCAPE					
LDP Objective 11: To protect and enhance the character and appearance of the landscape and the countryside.					
Policy Reference:		EnW5			
SA Objective Reference:		2, 7 & 18			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
11.1	<u>Local</u> Number of applications approved contrary to Policy EnW5 that would cause unacceptable harm to Special Landscape Areas.	No permission granted for development contrary to Policy EnW5 that would cause unacceptable harm to Special Landscape Areas.	No applications permitted contrary to Policy EnW5.	1 or more planning permissions granted not in accordance with Policy EnW5.	
11.2	<u>Local</u> Preparation of Supplementary Planning Guidance (SPG) in relation to Landscape Design, Management and Protection.	To prepare a Landscape Design, Management and protection SPG within two years of Plan adoption.	A draft Landscape Design, Management and Protection SPG has been prepared.	Failure to prepare A Landscape Design, Management and Protection SPG within two years of Plan adoption.	

ECONOMIC DEVELOPMENT					
LDP Objective 12: To provide and safeguard appropriate land for economic and skills development.					
RURAL ECONOMY					
LDP Objective 13: To strengthen and diversify the rural economy.					
Policy Reference:		EcW1 & EcW2			
SA Objective Reference:		2, 3, 4 & 7			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
12.1	<u>Core</u> Employment land development (ha) on allocated sites as a percentage of all employment allocations.	Development of 33% (4.82 Ha) of employment land by 2021.  Development of 67% (9.64 Ha) of employment land by 2026.  Development of 100% (14.46 Ha) of employment land by 2031.	0.6 ha of allocated employment land developed.	20% less or greater than the monitoring target over 2 consecutive years.	
12.2	<u>Local</u> Number of applications approved that would result in the loss of employment land protected under Policy EcW2	No permission granted contrary to Policy EcW2 that would result in the unjustified loss of land protected for employment.	No applications permitted contrary to Policy EcW2.	1 or more applications permitted contrary to Policy EcW2.	
12.3	<u>Core</u> Minimum number of additional jobs delivered.	626 jobs by March 2021.  1251 jobs by March 2026.  1877 jobs by 2031.	125 class B jobs during 2024-25.  Total of 243 class B jobs by March 2025.	20% less or greater than the monitoring target over 2 consecutive years.	

TOWN AND LOCAL CENTRES					
LDP Objective 12: <i>To provide and safeguard appropriate land for economic and skills development.</i>					
Policy Reference:		EcW3, EcW4, EcW5 & EcW6			
SA Objective Reference:		1, 2, 7 & 8			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
14.1	<u>Core</u> Amount of major retail and office development (sqm) permitted within established town and local centre boundaries.	All major retail and office applications submitted within established town and local centre boundaries.	There were no major retail or office development applications submitted, within the County Borough Boundary, during the monitoring period.	Less than 90% of all major retail and office applications granted permission over 2 consecutive years within established town and local centre boundaries.	
14.2	<u>Core</u> Amount of major retail development (sqm) permitted outside established town and local centre boundaries.	No major retail, development (sqm) permitted outside established town and local centre boundaries.	No applications permitted contrary to Policy ECW3.	1 or more applications permitted for major retail development contrary to Policy ECW3 in any 1 year.	
14.3	<u>Core</u> Amount of major office development (sqm) permitted outside established town and local centre boundaries.	No major office development (sqm) permitted outside established town/local centre and Protected Employment Sites.	No applications permitted contrary to Policies EcW1, EcW2 and EcW3.	1 or more applications permitted for major office development outside established town and local centre boundaries or contrary to Policies EcW1, EcW2 and ECW3 in any 1 year.	

14.4	<u>Local</u> New retail floorspace (sqm) built in HSRA.	400 sqm net floorspace completed by the end of 2031.	No new retail floorspace built in HSRA.	No application registered by the end of 2026.	
14.5	<u>Local</u> Town Centre Health Check: Total annual amount of vacant units in the Town Centre.	On par with Annual Welsh Town Centre Vacancy Rate.	The Town Centre Vacancy Rate was 16% in July 2025, below the Welsh Average of 16.9% (in 2024, according to the Welsh Retail Consortium and Local Data Company).	Vacancy Rate above Annual Welsh Town Centre Vacancy Rate over 2 consecutive years.	
14.6	<u>Local</u> Town Centre Health Check: Percentage of retail units in the Primary Shopping Area (PSA).	Maintain at least 75% of the commercial units at street level within the PSA as A1 in accordance with Policy EcW5.	The percentage of retail units in the Primary Shopping Area (PSA) during the monitoring period was 77%.	Percentage drops below 75% in any 1 year.	
14.7	<u>Local</u> Local Centre Health Check: Amount of non-retail uses in Local Centres.	No permission granted for Non-retail development that is contrary to Policy EcW5.	120 Non-Retail Units in the Local Centres	1 or more non-retail developments permitted contrary to Policy EcW5 in any 1 year.	

TOURISM, LEISURE AND RECREATION					
LDP Objective 15: To support sustainable tourism, leisure and recreation developments and encourage an all-year-round tourism industry.					
Policy Reference:		EcW7 & SW13			
SA Objective Reference:		1, 7, 16 & 17			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
15.1	<u>Core</u> Amount of major leisure development (sqm) permitted within established town and local centre boundaries.	All major leisure applications submitted within established town and local centre boundaries.	There were no major leisure development applications permitted, within the County Borough Boundary, during the monitoring period.	Less than 90% of all major leisure applications granted permission over 2 consecutive years within established town and local centre boundaries.	
15.2	<u>Core</u> Amount of major leisure development (sqm) permitted outside established town and local centre boundaries.	No major leisure development (Sqm) permitted outside established town and local centre boundaries.	No applications permitted contrary to Policy EcW5.	1 or more applications permitted for major leisure development in any 1 year outside established town and local centre boundaries contrary to Policy EcW5.	
15.3	<u>Local</u> Number of applications approved that would result in the loss of tourism or leisure or recreation facilities.	No permission granted contrary to Policy SW13 that would result in the unjustified loss of tourism, or leisure or recreation facilities.	No applications permitted contrary to Policy SW13.	1 or more applications permitted contrary to Policy SW13.	

RENEWABLE ENERGY					
LDP Objective 16: To promote renewable and low carbon energy.					
Policy Reference:		EcW8 & EcW9			
SA Objective Reference:		4, 6, 9, 10 & 11			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
16.1	<u>Local</u> The capacity of renewable energy developments (electricity) permitted (MWe).	<p>To secure planning permissions for 12.5 MWe of electricity generation by 2021.</p> <p>To secure planning permissions for 25 MWe of electricity generation by 2026.</p> <p>To secure planning permissions for 37.4 MWe of electricity generation by 2031.</p>	0MWe permitted during the monitoring period.	<p>Failure to secure planning permissions for 7.17 MWe of electricity generation by 2021 by 10%.</p> <p>Failure to secure planning permissions for 14.33 MWe of electricity generation by 2026 by 10%.</p> <p>Failure to secure planning permissions for 21.5 MWe of electricity generation by 2031 by 10%.</p>	
16.2	<u>Local</u> The capacity of renewable energy developments (heat) permitted (MWth).	<p>To secure planning permissions for 13.27 MWth of heat generation by 2021.</p> <p>To secure planning permissions for 26.53 MWth of heat generation by 2026.</p>	0MW permitted during the monitoring period.	Failure to secure planning permissions for 6.5 MWth of heat generation by 2021 by 10%.	

		To secure planning permissions for 39.8 MWth of heat generation by 2031.		<p>Failure to secure planning permissions for 13 MWth of heat generation by 2026 by 10%.</p> <p>Failure to secure planning permissions for 19.4 MWth of heat generation by 2031 by 10%.</p>	
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MINERALS					
LDP Objective 17: To ensure a sustainable supply of minerals.					
Policy Reference:		EcW10, EcW11 & EcW13			
SA Objective Reference:		9 & 15			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
17.1	<u>Core</u> The extent of primary land-won aggregates permitted in accordance with the Regional Technical Statement for Aggregates expressed as a percentage of the total capacity required as identified in the Regional Technical Statement (MTAN).	Maintain a minimum 10-year land bank of permitted aggregate reserves over the entire plan period.	Landbank: 211.8 years	Less than a 10-year land bank of permitted aggregate reserves in any 1 year.	
17.2	<u>Local</u> Amount of development permitted within a Minerals Buffer Zone.	No permission granted for development within a Minerals Buffer Zone contrary to Policy EcW12.	No applications permitted contrary to Policy EcW12.	1 or more applications permitted for development within a Minerals Buffer Zone contrary to Policy EcW12 in any 1 year.	
17.3	<u>Local</u> Amount of permanent sterilising development permitted within a Minerals Safeguarding Area.	No permission granted for development within Minerals Safeguarding Areas contrary to Policy EcW13.	No applications permitted contrary to Policy EcW13.	1 or more applications permitted for development within a Minerals Safeguarding Area contrary to Policy	

				EcW13 in any 1 year.	
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WASTE MANAGEMENT					
LDP Objective 18: To promote the efficient use of materials and resources and ensure an integrated network of waste management facilities.					
Policy Reference:		EcW14			
SA Objective Reference:		4, 9 & 11			
Indicator		Target Outcome:	Policy Achievement	Trigger Point	Action
18.1	<u>Local</u> Capacity to cater for the County Borough's waste.	Maintain sufficient capacity to cater for the County Boroughs waste (To be confirmed at a regional level) in accordance with TAN 21.	Sufficient capacity to cater for the County Borough's waste has been maintained.	Triggers to be established at a regional level in accordance with TAN 21.	

## Appendix B – Delivery of LDP Allocations

The table below provides the status of the current LDP allocations.

### Residential

Allocation	Site Name	Number of Units	Status
<b>Primary Growth Area</b>			
SW3.1	Hoover Factory Site	440	Outline planning permission P/25/0165 granted Jan 2026. Demolition & remediation works due 2026-2027. First completions anticipated in 2028.
SW3.2	Sweetwater Park, Trefechan	10	Delivered in 2019.
SW3.3	Upper Georgetown Plateau	50	No planning application received.
SW3.4	Brondeg, Heolgerrig	50	The first phase of 9 units is nearing completion. No planning application has been received for the remainder of site.
SW3.5	Beacon Heights, Swansea Road	20	Delivered in 2021.
SW3.6	Winchfawr, Heolgerrig	20	No planning application received.
SW3.7	South of Castle Park	160	No planning application received.
SW3.8	Cyfarthfa Mews, Swansea Road	19	Delivered in 2019.
SW3.9	Trevor Close, Pant	20	A revised scheme is currently being considered by the developer. A planning application is pending.
SW3.10	East Street, Dowlais	10	Delivered in 2025.
SW3.11	St Johns Church, Dowlais	20	Delivered in 2020.
SW3.12	Victoria House, Dowlais	19	Delivered in 2017.
SW3.13	Pen y Dre Fields, Gurnos	40	No planning application received.
SW3.14	Goetre Primary School, Gurnos	120	No planning application received.
SW3.15	Former General Hospital	20	Planning permission was granted for 30 units in 2023. Development has yet to commence.

SW3.16	Haydn Terrace, Penydarren	40	A planning application for 47 units was approved in February 2026
SW3.17	Former St Peter and Paul Church, Abercanaid	13	Delivered in 2017.
SW3.18	Twynyrodyn	120	The site is under construction and is due for completion in 2028.
SW3.19	Former Mardy Hospital, Twynyrodyn	114	The first phase was delivered in 2018 (69 units). No planning application has been received for phase two.
SW3.20	Bradley Gardens, 2 Penyard	90	MTCBC approved the sale of the site to a Registered Social Landlord (RSL) (Merthyr Valleys Homes) in January 2026. A planning application is expected to be submitted by end of the year.
SW3.21	Former St. Tydfil's Hospital	50	Demolition of the existing buildings is complete. Planning permission is in place with the developer hoping to commence construction works in 2026.
SW3.22	Former Miners Hall	12	No planning application received.
SW3.23	Former Ysgol Santes Tudful	10	Construction of the site has commenced, with completion expected in 2027.
SW3.24	Sandbrook Place	12	Delivered in 2021.
SW3.25	Clwydyfagwr, Swansea Road	40	The site is being developed for 42 units by an RSL (Merthyr Valleys Homes) and is due for completion in 2028.
SW3.26	P and R Motors Pentrebach	22	No planning application received.
SW3.27	Land South of Bryniau Road, Pant	26	Delivered in late 2025.
SW3.28	Land North of Ty Llwyd, Incline Top	11	No planning application received.
<b>Sub Total</b>	<b>1578</b>		
<b>Other Growth Areas</b>			
SW3.29	Project Riverside, Merthyr Vale	153	Delivered in 2022.
SW3.30	Walters Terrace, Aberfan	23	Delivered in 2018.
SW3.31	Opposite Kingsley Terrace, Aberfan	12	Planning permission granted in 2023 and conditions have been discharged. Construction is due to commence in 2026.

SW3.32	Adjacent to Manor View, Trelewis	248	Phase 1 was delivered in 2018 (173 units). No planning application has been received for the remaining phases.
SW3.33	Stormtown, Trelewis	80	No planning application received.
SW3.34	Cilhaul, Treharris	30	No planning application received.
SW3.35	Oaklands, Treharris	50	No planning application received.
SW3.36	Y Goedwig, Edwardsville	22	Planning permission was granted in 2018 but has now lapsed.
<b>Sub Total</b>	<b>618</b>		
<b>Total Policy SW3 Allocations</b>	<b>2196</b>		

## Employment

Allocation	Site Name	Size ha (Gross/Net)	Status
EcW1.1	Former Hoover Factory Car Park	1.5/1.5	The site is part of an outline application (P/26/0165) approved in January 2026.
EcW1.2	Goatmill Road	16.98/14.75	A pre-application enquiry was submitted in late 2025 for the comprehensive redevelopment business park.
EcW1.3	Ffos-y-fran	18.85/11.3	The site will not be delivered until the final restoration scheme for the wider site is determined.
EcW1.4	Land South of Merthyr Tydfil Industrial Estate	3.1/3.1	The site was used as a temporary depot during construction of the Metro scheme but has recently been vacated. MTCBC is intending to market the site for employment purposes in the near future.
<b>Total</b>		<b>30.65 ha (Net)</b>	

## Project Heartland

Allocation	Site Name	Status
Policy SW7	The Former Ivor Steel Works Regeneration Site	The top plateau is currently being marketed for residential purposes. MTCBC are in the process of undertaking feasibility work for an

		education facility on the lower plateau.
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## Appendix C – Summary of Policy Efficacy and Necessary Changes

Policy		Comments
<b>Improving our Social Well-being</b>		
Policy SW1	Provision of New Homes	Revise based on updated LHMA and changes to national policy and guidance. Certain housing allocations delivered; a review of undeveloped sites required.
Policy SW2	Provision of Affordable Housing	Revise based on updated LHMA, changes to national policy and guidance and viability assessment.
Policy SW3	Sustainably Distributing New Homes	Review as part of the reconsideration of the development strategy.
Policy SW4	Settlement Boundaries	Functioning effectively – minor amendments may be required.
Policy SW5	Affordable Housing Exception Sites	Revise, the policy has not delivered exception sites during the plan period.
Policy SW6	Hoover Strategic Regeneration Area	Review as part of the reconsideration of the development strategy.
Policy SW7	The Former Ivor Steel Works Regeneration Site	Review as part of the reconsideration of the development strategy.
Policy SW8	Gypsy, Traveller and Showpeople Accommodation	Revise based on updated LHMA and viability assessment.
Policy SW9	Planning Obligations	Functioning effectively however revise based on updated viability assessment.
Policy SW10	Protecting and Improving Open Spaces	Revise, policy efficacy imprecise.
Policy SW11	Sustainable Design and Placemaking	Functioning effectively – minor amendments may be required.
Policy SW12	Improving the Transport Network	Functioning effectively however revision required in view of changes to national policy and guidance.
Policy SW13	Protecting and Improving Local Community Facilities	Functioning effectively – minor amendments may be required.
<b>Improving our Cultural Well-bring</b>		
Policy CW1	Historic Environment	Functioning effectively however revision required in view of changes to national policy, legislation and guidance.

Policy CW2	Cyfarthfa Heritage Area	Functioning effectively – minor amendments may be required.
<b>Improving our Environmental Well-being</b>		
Policy EnW1	Nature Conservation and Ecosystem Resilience	Functioning effectively however revision required in view of changes to national policy, legislation and guidance.
Policy EnW2	Internationally and Nationally Protected Sites and Species	Functioning effectively however revision required in view of changes to national policy, legislation and guidance.
Policy EnW3	Regionally Important Geological Sites, Sites of Importance for Nature Conservation, Local Nature Reserves and Priority Habitats and Species	Functioning effectively however revision required in view of changes to national policy, legislation and guidance.
Policy EnW4	Environmental Protection	Functioning effectively – minor amendments may be required.
Policy EnW5	Landscape Protection	Functioning effectively – minor amendments may be required.
<b>Improving our Economic Well-being</b>		
Policy EcW1	Provision of Employment Land	Revise, employment offer potentially out of step with the market, leading to under-delivery of allocations. Will be reconsidered as part of the development strategy.
Policy EcW2	Protecting Employment Sites	Functioning effectively – minor amendments may be required.
Policy EcW3	Retail Hierarchy – Supporting Retailing Provision	Functioning effectively – minor amendments may be required.
Policy EcW4	Retail Allocation	Review, to ensure that the quantity of retail floorspace allocated remains appropriate. Reconsider following production of a retail study.
Policy EcW5	Town and Local Centre Development	Functioning effectively – minor amendments may be required. Reconsider following production of a retail study.

Policy EcW6	Out-of-Town Retailing Areas	Functioning effectively – minor amendments may be required. Reconsider following production of a retail study.
Policy EcW7	Tourism, Leisure and Recreation Development	Functioning effectively – minor amendments may be required. Reconsider following production of a retail study, inclusive of leisure and recreational analysis.
Policy EcW8	Renewable Energy	Functioning effectively however revision required in view of changes to national policy and guidance.
Policy EcW9	District Heating	Revise, policy efficacy imprecise due to wider viability concerns.
Policy EcW10	Sustainably Supplying Minerals	Functioning effectively – minor amendments may be required. RTS shows a sufficient supply of minerals and 211.8-year landbank (in conjunction with Bannau Brycheiniog National Park).
Policy EcW11	Minerals Development	Functioning effectively – minor amendments may be required.
Policy EcW12	Minerals Buffer Zones	Functioning effectively – minor amendments may be required.
Policy EcW13	Minerals Safeguarding	Functioning effectively – minor amendments may be required.
Policy EcW14	Waste Facilities	Functioning effectively – minor amendments may be required.

**Note:** The above assessment is not definitive; further consideration will be given to amending local policies, as part of the LDP revision process. This will include considerations regarding policies' efficacy, intention and in certain instances, whether they are still deemed necessary. Furthermore, national policies will be analysed, inclusive of development management policies, as contained within *Planning Policy Wales (ed. 12)*. It will be ensured that the local policy framework is in conformity with the plans above it, in the development plan hierarchy.