



Cyngor Bwrdeistref Sirol
MERTHYR TYDFIL
MERTHYR TYDFIL
County Borough Council

Merthyr Tydfil Local Development Plan 2006 – 2021



Review Report April 2016



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Contents

Section	Page
1.0 Introduction	2
2.0 Findings of the Annual Monitoring Report	4
3.0 Vision	5
4.0 Primary Aim and Strategic Objectives	7
5.0 LDP Strategy	9
6.0 LDP Policies	17
7.0 Sustainability Appraisal	25
8.0 Joint Plans	27
9.0 Conclusion	29
 Appendix 1: Annual Monitoring Report – Performance Summary	 30
Appendix 2: Delivery of LDP Allocations	43
Appendix 3: Review of LDP Policy Effectiveness	47

1.0 Introduction

- 1.1 The adopted Merthyr Tydfil Local Development Plan (LDP) sets out the Council's priorities for the development and use of land in the County Borough and its policies to implement them over the fifteen year plan period between 2006 and 2021. The LDP was adopted on 25th May 2011 and, in accordance with statutory requirements, has subsequently been monitored on an annual basis with the publication of four Annual Monitoring Reports (AMRs) to date. Each AMR assesses the extent to which the LDP's strategy, policies and development sites are being delivered.
- 1.2 Up-to-date LDPs are an essential part of a plan-led planning system and in order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council is required to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. Consequently, a full review of the adopted LDP commenced on 25th May 2015 and culminates with the production of this Review Report which sets out the extent of changes required to the LDP and the revision procedure to be followed. The recommended changes have been informed by the findings of preceding AMRs, updates to the evidence base and ongoing surveys¹.
- 1.3 Section 2 provides a brief overview of the most recent AMR (published in October 2015) and highlights the aspects of the Plan that are not working or not progressing towards their stated objectives.
- 1.4 Section 3 reviews the LDP's Vision in the context of its relationship with the Council's Single Integrated Plan (SIP). A comparison is also made with the well-being goals arising from the Well-being of Future Generations Act (2015). In both cases, a conclusion is made on whether the LDP's Vision should be revised in order to improve policy integration.
- 1.5 Section 4 reviews the LDP's Primary Aim and Strategic Objectives. The Primary Aim is considered against the most recent population statistics prepared by the Office of National Statistics, the priority outcomes of the SIP and the well-being goals. The Strategic Objectives are only assessed against the priority outcomes of the SIP and the well-being goals. Recommendations are also made on how the Primary Aim and Strategic Objectives should be revised.

¹ Ongoing surveys relate to the statutory obligation under section 61 of the Planning and Compulsory Purchase Act 2004, which requires the Council to keep under review matters affecting development within its area.

- 1.6 Section 5 reviews the LDP's Strategy and focuses on the key components of population, housing and employment. Each component is considered separately, with consideration given to whether the Strategy is currently being delivered and the reasons for the current situation. A view is also provided on whether the current strategy should be rolled forward to 2031 (the end of a 15 year plan period that commences in 2016) or whether it should be reconsidered.
- 1.7 Section 6 provides a general review of LDP policies based on the findings of previous AMRs and evidence of significant contextual changes². Relevant policies are considered under their respective topic headings and recommendations for revision are made where necessary.
- 1.8 Section 7 provides an overview of the monitoring of the sustainability objectives and highlights the changes to the environmental baseline and plans, policies and programmes since the work was originally undertaken in 2006.
- 1.9 Section 8 addresses the issue of preparing a joint plan with neighbouring authorities. This is undertaken within the context of the Welsh Government's preference for Merthyr Tydfil CBC to merge with Rhondda Cynon Taff and Bridgend County Borough Councils as part future local government re-organisation.
- 1.10 Section 9 concludes on the overall findings of the previous sections and recommends the revision procedure to be followed in preparing a replacement LDP.

² Please note that housing and employment policies are not included in this section as they were reviewed as part of the Strategy in Section 5.

2.0 Findings of Annual Monitoring Reports

- 2.1 National guidance set out in the Local Development Plan Manual (Edition 2, August 2015) states that a plan review should, amongst other things, draw on the findings of published AMRs. The most recent AMR was published in October 2015 and covers the period from 1st April 2014 to 31st March 2015. A summary of the Plans achievements can be found in Appendix 1.
- 2.2 Whilst the implementation of the Plan has been successful in a number of key areas, there are certain aspects of the Plan that are not working or are not progressing towards their stated objectives. The most recent AMR identifies the follow areas of concern:
- The supply of housing land;
 - The number of dwellings built in the Primary Growth Area;
 - The number of dwellings being built, particularly general market dwellings;
 - The amount of employment floorspace built in the Primary Growth Area;
 - The delivery of B1 employment floorspace;
 - The percentage of LDP land allocations delivered;
 - The percentage of total development permitted on allocated sites; and
 - The vacancy rate of retail premises in Merthyr Tydfil Town Centre.
- 2.3 With the exception of retail vacancy rates, all of the above indicators suggest that the LDP's development allocations are not coming forward as anticipated and the *Enhanced Growth Strategy* of the Plan is not currently being delivered. The lower than anticipated levels of housing and employment are significant contributing factors in not meeting the requirements of the Strategy, and the implications for continuing with this Strategy are considered in the more detail in Section 5 below. Appendix 2 also provides an overview of the delivery of all allocated development sites since the start of the plan period.
- 2.4 The vacancy rate of the retail premises in Merthyr Town Centre is a contextual indicator which reflects the general 'health' of the Town Centre. The indicator has failed to meet its target for all but one year since the adoption of the LDP and accordingly, has consistently been identified as an aspect of the Plan that is not working in AMRs. Whilst economic conditions have been identified as the principal cause behind the failure to improve vacancy rates, a broader reconsideration of the town centre strategy could assist in identifying policy interventions that could improve the vitality and viability of the Town Centre.

3.0 Vision

- 3.1 The vision of the LDP provides a clear view of what kind of place the County Borough should become in the future, and it is essential that it remains relevant to local needs and aspirations beyond the current plan period (2006 to 2021). The LDP vision was developed through a partnership approach and was informed by a range of plans and strategies, including the Council's Community Plan which was in existence at that time. The Vision states that:

“Between 2006 and 2021, the Local Development Plan will ensure that the development and use of land in Merthyr Tydfil is undertaken in a sensitive manner following a holistic approach with the concept of sustainability as its core. In this way, the ambition of the Plan is to reflect the expectations of the community to:-

- ***facilitate sustained growth;***
- ***promote social inclusion;***
- ***safeguard the environment; and***
- ***provide an excellent quality of life for all.”***

- 3.2 The relationship between the LDP and the Single Integrated Plan (SIP) is particularly important as the latter provides the overarching strategic policy framework for the County Borough. National guidance states that LDPs should complement SIPs by providing the land use expression of the shared vision of how an area will change.³

- 3.3 The current SIP for Merthyr Tydfil (revised and approved by the Local Service Board on 1st October 2015) contains the following vision:

“To strengthen Merthyr Tydfil’s position as the regional centre for the Heads of the Valleys and be a place to be proud of where:

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

- 3.4 The Vision is also supported by the underpinning principle of ***“Learning for Life”*** and four priority outcomes which are as follows:

- ***“People in Merthyr Tydfil have the opportunity and aspiration to learn and develop their skills to maximise their potential.***

³ Paragraph 5.2.3.1 of the Local Development Plan Manual Edition 2 (August 2015).

- ***People in Merthyr Tydfil benefit from a strong, sustainable and diverse economy.***
- ***People who live and work in Merthyr Tydfil are supported to enjoy a healthier and better quality of life.***
- ***People enjoy a vibrant, attractive, safe and sustainable environment in which to live, work, play and visit.”***

- 3.5 Whilst the visions of the LDP and SIP are broadly compatible, the LDP Vision should be revised to align more closely with the Vision of the SIP, particularly in respect of the emphasis on the development of people’s health, skills and life-long learning. In terms of health, the revised LDP should encourage healthier lifestyles through the protection and enhancement of accessible recreational and leisure facilities and the enhancement of active travel networks which encourage walking and cycling. It will also need to protect and provide adequate land for new or expanded health facilities.
- 3.6 In respect of skills and lifelong learning, the revised LDP will need to recognise the importance of modern education facilities and the role that they play in up-skilling the local population. It will therefore need to protect existing facilities and make sufficient land available for the provision of new or expanded educational facilities.
- 3.7 It should be noted that the SIP will shortly be replaced by a Local Well-being Plan (LWP) which is a requirement of the Well-being of Future Generations Act (2015). The Act places a duty on public bodies, including local authorities, to carry out sustainable development and to set objectives which maximise its contribution to achieving each of the seven well-being goals. Each public body must take all reasonable steps, in exercising its function, to meet those objectives. The Act also establishes Public Service Boards (PSB) for each local authority area in Wales who must improve economic, social, environmental and cultural well-being of its area by working to achieve the well-being goals. PSBs are responsible for preparing and publishing a LWP which sets out its objectives and the steps it will take to meet them.
- 3.8 Whilst the LWP for the County Borough is at an early stage of development, it is considered beneficial to undertake a brief assessment of whether the Vision of the LDP contributes to the achievement of the well-being goals. It has been found that the Vision generally aligns well with the well-being goals, but its contribution can be improved towards two of the well-being goals, namely “A healthier Wales” and “A globally responsible Wales”.

4.0 Primary Aim and Strategic Objectives

Primary Aim

- 4.1 The primary aim of the LDP is ***“to facilitate a reduction in current levels of out migration from the County Borough so that population levels stabilise by 2011 and a 10 year period of enhanced growth is achieved thereafter.”***
- 4.2 The population estimates⁴ that informed the formulation of the Primary Aim have been found to be incorrect as a result of the 2011 Census and revised mid-year population estimates produced by the Office of National Statistics. The population of County Borough is now estimated to have stabilised as early as 2003 and the Plan’s target of increasing the population to 59,000 has already been met. As a consequence, the Primary Aim of the LDP has been met and needs to be updated to reflect changes in population estimates. A more detailed analysis of the County Borough’s population is provided in Section 5 below.
- 4.3 The Primary Aim of the LDP has also been assessed against the priority outcomes of the SIP and the well-being goals, and it is been found that, in particular, it contributes to the achievement of two well-being goals, namely “A prosperous Wales” and “A Wales of cohesive communities”. Consideration should therefore be given to how a revised primary aim can make a greater contribution towards the achievement of the priority outcomes of the SIP and the well-being goals.

Strategic Objectives

- 4.4 The LDP sets out 12 strategic objectives covering social, economic, environmental and cultural matters. The existing objectives remain appropriate and collectively contribute to meeting the majority of the priority outcomes of the SIP and the well-being goals. Some revision will however be required to ensure that the objectives become more specific, recognising key local priorities which reflect both the priority outcomes of the SIP and the well-being goals. In particular, a revised strategic objective will need to address more clearly the aspiration of life-long learning and the development of skills, while Strategic Objective 12, which relates to reducing the impact of climate change, will need to be revised to reflect significant contextual changes and to contribute more fully towards the well-being goals by enabling a move towards

⁴ Population estimates were prepared in 2007 using Office for National Statistics Mid-Year Estimates and the Chelmer Population and Housing Model.

an innovative, productive and low carbon society which recognises the limits of the global environment and uses resources efficiently.

5.0 LDP Strategy

Population

- 5.1 The adopted LDP is based on an *Enhanced Growth Strategy* which aims to facilitate a reduction in current levels of outmigration so that population levels stabilise by 2011 and a 10 year period of enhanced growth is achieved thereafter. The *Enhanced Growth Strategy* applies a net in-migration rate of 0.85% per annum which results in a population increase of 4,400. At the time of preparing the enhanced growth forecasts in 2007, it was estimated that Merthyr Tydfil's population was 54,600 and as such, the population would increase to 59,000 by 2021. This contrasted with the trend based forecast⁵ at the time, which indicated that Merthyr Tydfil was experiencing net out migration of 300 persons per annum, resulting in a decline in population from 54,600 in 2006 to 50,200 by 2021.
- 5.2 The 2011 Census found that Merthyr Tydfil's population was actually higher than previously estimated by the Office for National Statistics, with a population of 58,851 in 2011. The revised mid-year population estimates⁶ based on the 2011 Census also indicate that Merthyr Tydfil's population was in fact over 2,000 people higher in 2006 (56,627) than previously estimated and that the population had actually been increasing since 2003. In addition, the LDP's target of increasing the population to 59,000 was actually met in 2013 based on the most recent 2014 mid-year population estimates⁷.
- 5.3 There are significant differences between the current population estimates produced by the Office for National Statistics and those used to inform the LDP's Strategy and it is evident that the level of population growth for the LDP needs to be reconsidered. The implications of rolling the LDP forward to 2031 also needs to be taken in to account, particularly in light of the Welsh Government population projections⁸ which indicate that Merthyr Tydfil will have a population of 62,316 in 2031.

Housing

- 5.4 The population growth planned for the adopted LDP is essential to the determination of the number of dwellings to be delivered over the plan period.

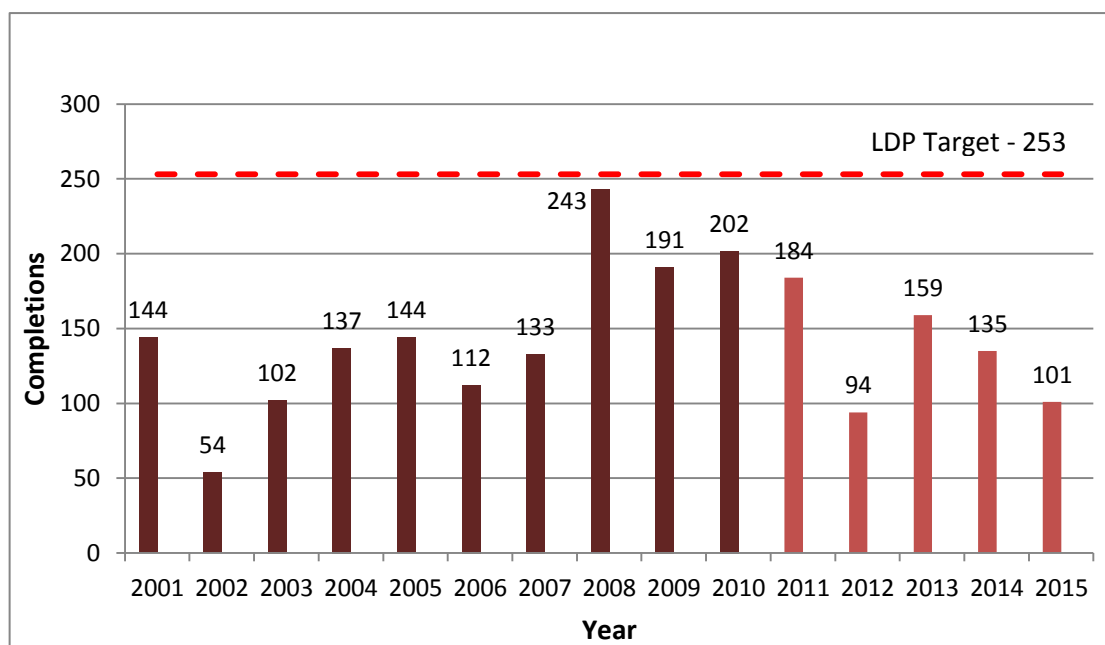
⁵ Also prepared in 2007 based on Office for National Statistics Mid-Year Estimates.

⁶ Published by the Office for National Statistics on 30th April 2013.

⁷ Published by the Office for National Statistics on 25th June 2015.

⁸ Taken from StatsWales website on 16th March 2016.

The LDP's Strategy seeks to deliver 3,800 dwellings⁹ in order to meet the increase in population. This equates to a building rate of 253 dwellings per annum, which is an ambitious level of growth compared to the level of dwelling completions experienced within the County Borough prior to the start of the plan period in 2006 (See Graph 1 below).



Graph 1: Dwelling Completions between 2001 and 2015

- 5.5 As of 31st March 2015, 1,536 out of the anticipated 3,800 dwellings required by the Strategy had been delivered. Whilst this represents a significant number of dwellings, the level of delivery is below that which is required to meet the requirements of the Strategy. This is illustrated through Graph 1 above, which shows that the requirement of delivering 253 dwellings per annum has not been met for a single year over the plan period to date.
- 5.6 The highest level of completions was reached in 2008 with 243 dwellings delivered. This figure was just short of the target and reflected the ongoing development of a number of large sites by four national housebuilders which commenced during the period of economic growth. Relatively high levels of dwelling completions were also experienced between 2009 and 2011 as these sites continued to be built out.
- 5.7 There is little doubt that the economic downturn has had a significant effect on the delivery of dwellings over recent years, due to the contraction of the housing industry and the tendency for housing developers to focus on the

⁹ The LDP actually allocates 3,964 dwellings to provide a degree of flexibility in meeting the identified level of growth.

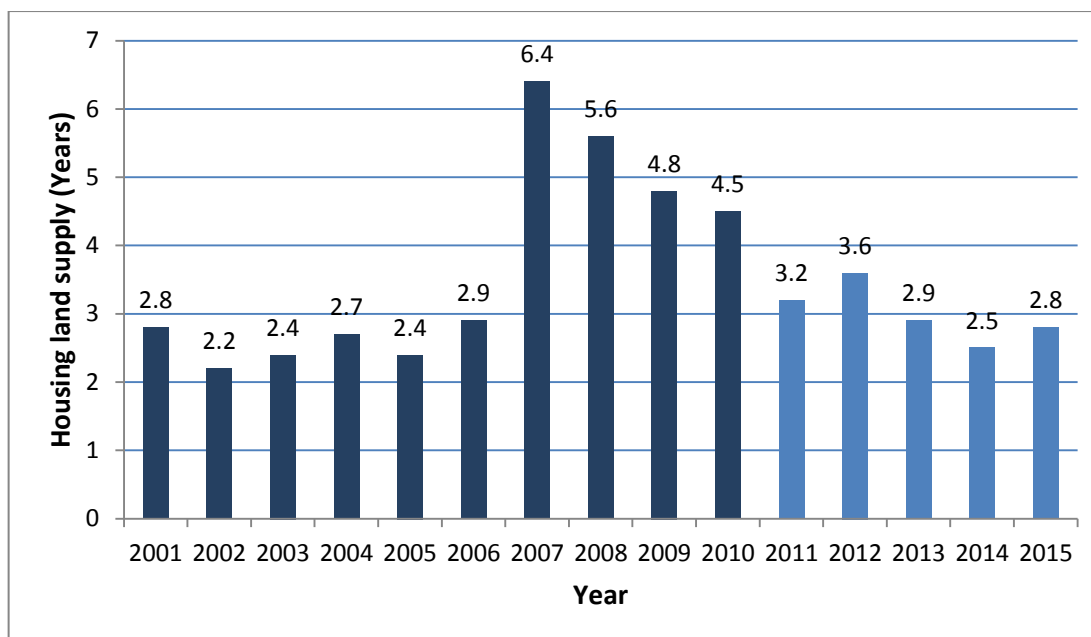
more secure prime market opportunities in areas such as Cardiff and the M4 Corridor. The effects have been most pronounced since 2011 with dwelling completions falling as low as 94 in 2012. Currently there are only two national house builders active within in the County Borough; Taylor Wimpey at Cwrt Aneurin Bevan and Redrow at Manor View. Whilst there is anecdotal evidence indicating that dwellings are selling well on these schemes, there are uncertainties over when dwelling delivery can increase to the level experienced in 2008 and whether that level of delivery can be sustained for a period of time. It is considered that a period of strong and sustained growth for the UK economy and housing market is necessary for this to occur.

- 5.8 There are a number of factors, both positive and negative, which have the potential to influence the recovery of dwelling delivery within the County Borough. In terms of positive factors, public sector funding through the Welsh Government's Vibrant and Viable Places regeneration programme is currently being used to stimulate private sector development on housing sites. In the medium to longer term, the Metro will also deliver new transport infrastructure which will improve the connectivity of Merthyr Tydfil within the region, and the Cardiff Capital Region City Deal, which consists of £1.2 billion of funding, will provide new infrastructure and targeted investment which will help the region unlock its growth potential over the next 20 years.
- 5.9 In respect of negative factors, the release of a significant amount of housing sites in more attractive housing market areas across the South East Wales region has the potential to draw national housebuilders away from the County Borough. In terms of the wider housing market, Merthyr Tydfil is not a primary development location with developers preferring to operate in areas, such as Cardiff and the M4 corridor, where larger profits can be realised. Recent, notable releases of significant amounts of land for housing include Cardiff's adopted LDP (41,415 dwellings allocated) and Caerphilly's deposit LDP (12,400 dwellings allocated) which is currently under consultation. The housing allocations of both LDPs include urban extensions on greenfield sites.
- 5.10 Planning Policy Wales Edition 8 (January 2016) is clear in that local planning authorities must ensure that sufficient land is genuinely available or will become available to provide a 5 year supply of the land for housing (paragraph 9.2.3). The Council has not achieved a 5 year land supply since 2008 (See Graph 2 below) and the most recent local housing market assessment has calculated a 2.8 year housing land supply in 2015. The calculation is based on the residual method, which is explained in Table 1 below.

THE RESIDUAL METHOD	
A.	Using the total number of dwellings needed over the plan period (as set out in the adopted LDP). 3800
B.	Calculate the residual requirement by subtracting the number of dwellings built since the start of the plan period from the total number of dwellings needed (A). $3800 - 1536 = 2264$
C.	Calculate the 5 year requirement by dividing the residual requirement (B) by the number of years of the plan period remaining and multiplying by 5. $(2264/6) \times 5 = 1887$
D.	Calculate the annual need by dividing the 5 year requirement (C) by 5. $1887/5 = 377$
E.	Work out how many houses could be built within a 5 year period (i.e. no physical constraints and the landowner or developer ready to bring site forward for development). 1070
F.	Calculate land supply in years by dividing the supply of dwellings (E) by the annual need (D). $1070/377 = 2.8$ years

Table 1: Residual method for calculating 5 year land supply

- 5.11 Technical Advice Note 1 Joint Housing Land Availability Studies (January 2015) states that where the local planning authority has a shortfall in housing land supply, consideration should be given to the reasons for the shortfall. As indicated above, the economic downturn has had a significant effect on the delivery of housing allocations and this is considered to be principal reason for not achieving a 5 year land supply since 2008. Notwithstanding this, there remains a need to review all undeveloped housing allocations in the LDP to ensure that development on these sites remains viable and the allocations will be delivered. This could result in certain housing allocations being removed from the LDP and new sites being allocated to meet local housing needs up to 2031. A formal 'call for candidate sites' inviting anyone to put forward potential sites for development will form part of this process.



Graph 2: Housing Land Supply Between 2011 and 2015 (years)

- 5.12 It is important to note that where the housing land supply figure is below the 5 year requirement, the need to increase supply should be given considerable weight when dealing with planning applications for housing provided that the development would otherwise comply with the development plan and national policies¹⁰. Given that the Council only has a 2.8 year housing land supply, considerable weight would have to be given to any speculative housing development that meets the aforementioned criteria. This situation therefore has the potential to undermine the plan-led approach which provides certainty for developers and the public about the type of development that will be permitted at a particular location.
- 5.13 In terms of the spatial distribution of housing, the *Enhanced Growth Strategy* focusses on three distinct areas: the *Primary Growth Area* (PGA), which comprises of the northern settlements; the *Secondary Growth Area* (SGA), which comprises of Edwardsville, Treharris and Quakers Yard; and the *Other Growth Areas* (OGA), which comprises of Troedyrhiw, Aberfan, Merthyr Vale and Bedlinog. The amount of housing allocations varies across the three areas with approximately 3,134, 550 and 250 dwellings allocated in the PGA, SGA and OGA respectively.
- 5.14 Since the start of the plan period, 1,212 new dwellings have been built in the PGR. Whilst the overall amount delivered is much higher than SGA and OGA, the delivery rate is currently not at a level sufficient to meet the dwelling requirement by 2021. A lower than anticipated dwelling delivery rate is also

¹⁰ Paragraph 6.2 of Technical Advice Note 1 – Joint Housing and Land Availability Studies (January 2015)

occurring in the OGA, with only 43 dwellings built since the start of the plan period. Approximately 60% of the housing allocations in the OGA are, however, on Project Riverside in Aberfan (H39), which has recently experienced significant infrastructure improvements. As a consequence, the site is now free from any physical constraints that would prevent housing development on the site, increasing the likelihood that the anticipated 150 dwellings will make a significant contribution to meeting the dwelling requirement by 2021.

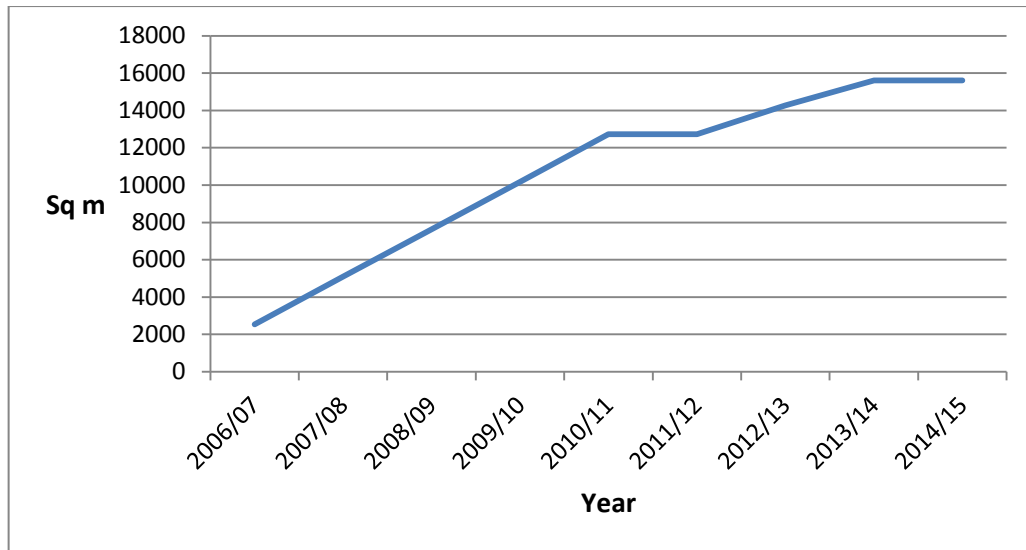
- 5.15 In contrast to the PGA and OGA, the rate of dwelling delivery in the SGA area is currently on target (281 dwellings delivered) to meet the dwelling requirement by 2021. This is primarily due to the on-going development of H48, a large housing allocation adjacent to the Shingrig Estate, alongside a number of smaller scale housing developments (H43, H46, H47 and H50).
- 5.16 In conclusion, the rate of dwelling delivery is not at a level sufficient to meet the requirements of the LDP's Strategy and, as a consequence, the Council does not have a 5 year land supply, leaving it vulnerable to speculative housing developments. Whilst economic conditions are improving, there remain uncertainties over when dwelling delivery rates will reach the level required to meet the needs of the Strategy and whether that rate can be sustained for a period of time. There are also variations in success of dwelling delivery between growth areas, with the SGA faring better than PGA and OGA. It is therefore considered that both the level and spatial distribution of growth needs to be reconsidered in order to establish whether the current strategy is the most appropriate for the delivery growth up to 2031.

Employment

- 5.17 Increasing employment opportunities within the County Borough is another key component of the *Enhanced Growth Strategy*, and accordingly, the Plan allocates 27.52 hectares of employment land entirely within the PGA. The amount of employment land actually required to meet the needs of the Strategy is 9.2 ha (0.7 ha for industrial/warehousing and 8.5 ha for office)¹¹. An over-provision was, however, considered necessary in order to take in to account the needs of the waste management sector and to provide choice and flexibility to the employment market.
- 5.18 In terms of industrial/warehousing (B2/B8) employment land, 15,601 sq m of floorspace has been delivered (See Graph 3 below) and as such, the needs of the Strategy and the interim B2/B8 floorspace targets (derived from the LDP allocations) have been met. However, the longer term target of delivering at least 56,500 sq m of B2/B8 floorspace by 2021 remains challenging and as

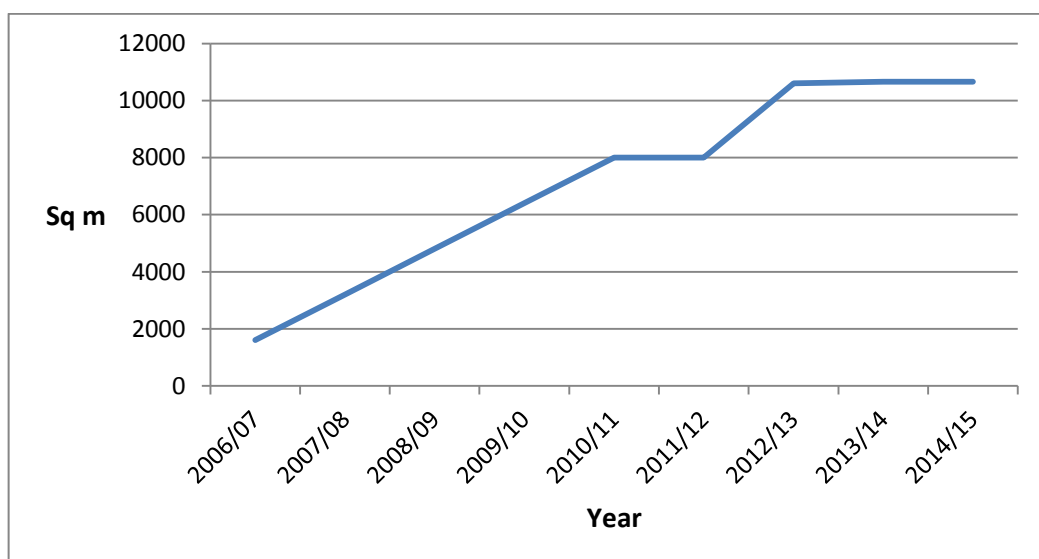
¹¹ Merthyr Tydfil CBC Employment Land Review, Roger Tym & Partners (July 2010)

such, all undeveloped employment allocations should be reviewed to ensure they remain deliverable.



Graph 3: Cumulative new B2/B8 floorspace delivered over the plan period

5.19 In respect of office (B1) employment land, 10,661 sq m of floor space has been delivered (See graph 4 below) which meets approximately 30% of the Strategy's need and is significantly below the forthcoming B1 floor space target of delivering between 28,500 and 30,790 sq m by 2016. Consequently, there are concerns over whether Strategic Objective 7, which seeks to 'improve and diversify the economy', is being met, particularly given that office based employment was predicted to be the main growth sector over the Plan period.



Graph 4: Cumulative new B1 floorspace delivered over the plan period.

- 5.20 The LDP allocates two employment sites, E6 (Rhydycar) and E8 (Former Hoover Car Park), exclusively for B1 uses based on their attractiveness for office type uses. Whilst LDP allocations E4 (Goatmill Road) and E5 (Ffos-y-Fran) also include B1 uses, their peripheral location make them more suitable for light industrial uses within the B1 land use classification. Two separate developments have been delivered on employment allocation E6, leaving only 1.77 hectares of land available for future office uses. A similar amount of land is available for office uses at employment allocation E8 (1.67 hectares). Together, these sites now offer a limited choice to the employment market, and it is considered that B1 employment allocations should be reviewed in order to ascertain whether the delivery of B1 floorspace can be stimulated through the identification of further employment sites that are attractive to office type uses.
- 5.21 The employment land requirement up to 2031 also needs to be considered, which will be based on revised population projections and a review of the employment rate of the working age population, and the new requirements of Chapter 7 Economic Development of Planning Policy Wales Edition 8 (January 2016), Technical Advice Note 23 Economic Development (February 2014) and the Welsh Government's recent guidance (August 2015) entitled *"Practice Guidance – Building and Economic Development Evidence Base to Support a Local Development Plan"*. A review of the general supply of employment land will also form part of this work to ensure that the level of flexibility is not out of sync with the employment market and that the development for other land uses is not being frustrated.

6.0 LDP Policies

- 6.1 A review all LDP policies has been undertaken based on the findings of previous annual monitoring reports¹² and evidence of significant contextual changes, such as changes in the local context and/or changes to national policy or legislation. A summary of whether a policy is functioning effectively and whether changes are likely to be necessary as part of plan revision is provided in Appendix 3. Policies that are significantly affected by contextual changes and are likely to require modification are discussed in more detail below under their relevant topic headings.

Affordable Housing

- 6.2 During the LDP Examination in 2010, the Council needed to produce an amended Local Housing Market Assessment (LHMA) taking into account several issues raised by the Inspector at the initial hearing sessions. The assessment identified an annual need in the County Borough of 34 affordable units per annum (20 in the Primary Growth Area; 2 per annum in the Secondary Growth Area; 12 per annum in the Other Growth Areas). These findings provided the evidence for both Policy BW19 (overall affordable housing target) and Policy AS22 (affordable housing contributions based on viability).
- 6.3 The Housing (Wales) Act 2014 required local authorities to produce an up to date LHMA by April 2015 and to update the assessment every two years. A revised LHMA was produced in March 2015, and following the methodology contained in Welsh Government guidance – which differs from the previous methodology used in 2010 – identified an annual need of 366 affordable units across the County Borough. This is more than ten times the need identified in the 2010 assessment.
- 6.4 Whilst the methodologies used in both LHMA's were broadly similar, there are some differences in the calculations that resulted in the findings of the most recent LHMA varying significantly from the 2010 assessment. The main difference in methodologies relates to the calculation of newly arising need from existing households. The 2010 assessment made an assumption of a fixed percentage of existing owner occupiers (0.37%) falling into housing need through financial difficulty, while the 2015 assessment calculates the need from existing households by taking an average of the annual number of homelessness presentations in the County Borough. The latter method presents a more accurate picture of need from existing households as it does not just take financial issues into consideration; it also considers other causes

¹² See Appendix 1 for a quick reference to policy achievements taken from the 2015 Annual Monitoring Report

of housing need such as personal circumstances, including the break-up of households, and other contextual changes, such as the 'bedroom tax'.

- 6.5 Given the significant increase in the affordable housing need within Merthyr Tydfil, it will be necessary to reconsider the aforementioned affordable housing policies in the LDP. Policy TB13 (affordable housing exception sites) may also need to be reconsidered in order to maximise affordable housing provision across the County Borough.
- 6.6 In addition to the level of need identified changing dramatically from the initial LHMA, there is evidence indicating that the viability of policy targets for affordable housing also need to be re-examined. For instance, both average house prices and average income have changed by more than 10% since the adoption of the LDP in 2011, and a Community Infrastructure Levy was adopted by the Council on 2nd June 2014. As a consequence, the whole issue of affordability needs to be reconsidered.

Gypsy Travellers

- 6.7 The Gypsy and Traveller Accommodation Assessment (GTAA) that informed the adopted LDP was produced in 2008 and identified a need of 10 additional pitches. This did not result in the need to allocate a new site for Gypsy and Traveller accommodation as there was sufficient capacity at the existing Glynmil site to bring decommissioned pitches back in to use. The study also made several other recommendations such as improving access to the site and implementing a resident's group. There was no identified need for a transit site in the 2008 assessment.
- 6.8 The assessment of Gypsy and Traveller accommodation needs, and the duty to make provision for sites where the assessment identifies need, became statutory requirements under the Housing (Wales) Act 2014. The Council has recently produced an updated GTAA which has found that while there is no need for additional pitches by the end of the 5 year period to 2020, there will be a need for an additional 4 pitches over the 15 year period to 2030. In respect of the latter, it is considered that there is sufficient space to accommodate this additional provision within the existing Glynmil site, and as such, no additional sites are likely to be required in Merthyr Tydfil.
- 6.9 In respect of the need for a transit site, caravan count data and local records do not show any evidence of unauthorised encampments or people stopping in Merthyr Tydfil. There is also no evidence of any substantive planning applications relating to transit sites. The GTAA therefore concludes that there is no identifiable need for a transit/stopping site within Merthyr Tydfil. It does,

however, recognise that there may be a need for regional site which requires further consideration with neighbouring authorities.

Community Facilities

- 6.10 The adopted LDP has been successful in delivering a range of community facilities, such as primary schools, Merthyr College, Merthyr Health Park and Treharris Primary Care Centre. As such, a number of area specific policies require removal from the LDP. In terms of future requirements, the local education authority has identified a need for a new welsh medium primary school in the Cefn area and consideration of the needs of other public service providers will also be required as part of LDP revision.

Waste

- 6.11 In February 2014, the Welsh Government published updated versions of Planning Policy Wales and Technical Advice Note (TAN) 21 to reflect changes in national policy and guidance on waste. In respect of development plans, PPW indicates that local development plans will need to have particular regard to the Collections, Infrastructure and Market Sector Plan (CIMS Plan), waste planning monitoring reports and waste management priorities relevant to the local area (paragraph 12.6.1). In addition, LDPs should identify suitable locations for accommodating sustainable waste management facilities (paragraph 12.6.2) and secure opportunities to reduce or recycle waste as part of the design, construction and operation of buildings (paragraph 12.6.3). These policies are expanded on in TAN21, which also sets out regional annual monitoring arrangements. While regional waste plans, which informed the adopted LDP, no longer have effect, regional 'areas of search maps' remain relevant to the identification of locations suitable for waste management facilities.
- 6.12 LDP Policy AS7 (Waste management facilities – location of choice) will need to be amended to take account of the changes to national policy, particularly in respect of the cancellation of regional waste plans. LDP policy AS8 (Replacement civic amenity site) also requires deletion due to the changes in local waste management priorities. Notwithstanding this, annual monitoring has shown that waste objectives are being achieved and the general thrust of waste management policies remain sound. Since the start of the Plan, waste management facilities have been delivered on locally identified 'areas of search' and sufficient void capacity remains at Trecatti landfill site. Regional arrangements are also in place to process food, residual and green municipal waste. LDP Policy BW7 and the Sustainable Design SPG (adopted July 2013) also provide an adequate policy framework for securing sustainable waste management objectives in the design of new developments.

Minerals

- 6.13 The Regional Technical Statement (RTS) on Aggregates 1st Review (25th July 2014) provides updated recommendations to mineral planning authorities regarding the quantities of aggregate which need to be supplied from their area (apportionments) and the total tonnage of any new allocations which may need to be made in their local development plan to ensure that adequate provision is maintained throughout the relevant plan period. In terms of joint apportionment¹³ for the future provision of land-won primary aggregates in Merthyr Tydfil and Brecon Beacons National Park, the annualised amount for crushed rock is 0.82 million tonnes per year. This equates to 20.5 million tonnes of crushed rock over the 25 year period covered by the RTS (up to 2036). A comparison with the joint existing land bank of 94 million tonnes for crushed rock indicates that there is a surplus of existing permitted crushed rock reserves, and as such, no further allocations for crushed rock are required to be identified within the Merthyr Tydfil or Brecon Beacons LDPs.
- 6.14 Aggregate safeguarding maps were updated by the British Geological Survey in 2012 on behalf of the Welsh Government. The updated maps have identified sand resources within the County Borough which are not currently safeguarded under Policy BW10 (Mineral Safeguarding). The policy justification of BW10 and the LDP proposals map therefore require revising to take account of this change.
- 6.15 The long term inactive quarry at Morlais Castle is also considered within the policy justification of BW10 (paragraph 3.10.6) where reference is made to the need for a prohibition order which would prohibit the resumption of mineral working. A prohibition for the quarry was confirmed by the Welsh Government on 26th November 2013 and as consequence, Morlais Castle quarry needs to be removed from the LDP proposals map and paragraph 3.10.6 requires deletion
- 6.16 The Ffos-y-Fran land reclamation scheme has been in operation throughout much of the Plan's life and restoration works on phase one of the scheme have commenced. Consideration therefore needs to be given to amending the buffer zone of Ffos-Y-Fran (Policy TB9: Mineral buffer zones) to reflect the progressive restoration of the scheme.
- 6.17 A South Wales Regionally Important Geodiversity Sites (RIGS) audit was published by the British Geological Survey in 2013 on behalf of the Welsh Government. The audit identifies two new sites within the County Borough,

¹³ Merthyr Tydfil and Brecon Beacon National Park have been joined together for commercial confidentiality reasons.

namely Llan Uchaf, Bedlinog and Nant Ffrwd, Merthyr Tydfil. These sites are not protected by any policies within the LDP and consideration therefore needs to be given to the requirement for a non-statutory designation relating to RIGS.

Transport

- 6.18 The five South East Wales Valleys Local Authorities of Blaenau Gwent, Caerphilly, Merthyr Tydfil, Rhondda Cynon Taf and Torfaen jointly developed the South East Wales Valleys Local Transport Plan (LTP), which was published in January 2015. The LTP replaces the Regional Transport Plan (SEWTA, 2009), which informed the preparation of the adopted LDP.
- 6.19 The priority transport schemes identified in the LTP are not fully reflected in the LDP and as such, further consideration needs to be given to the policy and land use implications of such schemes in order to ensure that they are deliverable in the context of local policy. The following transport schemes identified in the LTP require further consideration: the relocation of the town centre bus station, a park and ride scheme at Pentrebach railway station, additional pedestrian footpaths/cycleways as part of active travel schemes, and an alternative vehicular access to the village of Abercanaid.

Renewable and Low Carbon Energy

- 6.20 The Welsh Government sent a letter to local planning authorities on 10th December 2015 outlining the Minister for Natural Resources' expectations for energy policies in local development plans. In particular, it highlights the Welsh Government's desire to see more use of spatial policies in local development plans to reflect renewable energy aspirations, and its concern that elements of energy policy in Planning Policy Wales (PPW) are not being fully implemented by local planning authorities.
- 6.21 The adopted LDP was not influenced by the current energy policies in PPW as these were introduced just three months prior (February 2011) to the adoption of the LDP in May 2011. PPW states that local planning authorities should facilitate the development of all forms of renewable and low carbon energy by considering the contribution that their area can make; creating development plan policies that enable this contribution to be delivered; and ensuring that development management decisions are consistent with national and international climate change obligations, including contributions to renewable energy targets and aspirations.
- 6.22 A revised version of the Renewable Energy Toolkit was published by the Welsh Government in 2015 and Renewable Energy Assessments (REAs) are

expected to form part of the Local Development Plan (LDP) evidence base. The aforementioned letter clarifies that REAs should inform policies, areas of search and allocations which guide local-authority scale (5MW – 25MW) renewable energy schemes or other low carbon technologies to the most appropriate locations. It explains it is imperative that the planning system identifies and protects areas with renewable energy generation potential for the long term.

- 6.23 It is clear that significant contextual changes have occurred in respect of renewable and low carbon energy since the adoption of the LDP. This will be a key issue for a revised LDP and policy changes are anticipated.

Retail

- 6.24 Convenience and comparison retail floorspace requirements over the plan period were informed by a retail and commercial leisure capacity study commissioned at the time of LDP production. A relatively small amount of convenience retail floorspace (789 sqm) was estimated to be required by 2021, which was anticipated to be met through the provision of a small supermarket, or a range of local provision. As such, no LDP designation was considered necessary to meet the requirement for convenience retail.
- 6.25 In terms of comparison retail, a requirement of 2,300 sqm floorspace was estimated based on a 1% point increase in the retention rate of expenditure being lost from the County Borough. Accordingly, an appropriate amount of land was allocated to meet this requirement at the existing Merthyr Tydfil Central Bus Station site (Policy AS20: Retail allocations) as part of a wider scheme which would also involve the remodelling of the bus station.
- 6.26 The identified requirement for both convenience and comparison floorspace has been met, despite the retail allocation not coming forward. A number of alternative retail developments have been permitted at various locations across the County Borough based on the findings of their associated retail assessments. A revised retail capacity study therefore needs to be undertaken, taking into account the permitted retail developments within the County Borough and the need to project the plan forward to 2031.
- 6.27 The retail allocation at the Central Bus Station will also need to be reconsidered in light of the Council's decision to relocate the bus station to Swan Street on the combined sites of the former Hollies Health Centre and the former Central Police Station. These sites have been highlighted as being potentially suitable for future retail development (paragraph 40.20.6 of the LDP); however, future retail development in the town centre will now need to focus on the existing Central Bus Station site. The potential for a larger retail

allocation on the latter will therefore need to be considered as part a sequential approach to meeting future retail requirements up to 2031.

Open Space

- 6.28 A draft Open Space Strategy has been prepared by the Planning Division which is based on local assessments of need and audits of existing open space provision within County Borough. The Strategy identifies locally important open spaces (9 in total), sets the standards for different types of open space and establishes the need for further types of open space. Shortfalls in accessibility, quantity and quality are identified at a ward level for each type of open space.
- 6.29 It is evident from the draft Open Space Strategy that there are shortfalls in a number of types of open space. The situation does however vary across the County Borough, with some wards having better open space provision than others. It is also clear that there is much variation between wards in terms of the type of open space provided.
- 6.30 Overall, there is a clear need for additional open space within the County Borough and it is likely that this will be a key issue for a revised LDP given their role in improving peoples' health and wellbeing. As a consequence, the following policies will need to be reconsidered: BW16 (Protecting/enhancing the network of leisure facilities), BW17 (Securing community infrastructure benefits) and AS17 (New outdoor sport/play space).

Historic Environment

- 6.31 Annual monitoring of historic environment related policies indicates that there are currently no concerns over the effectiveness of their implementation. A number of contextual changes have however occurred since the adoption of the LDP, including the designation of new and revised conservation areas at Council Street and Urban Street and Thomastown, the designation of Cefn Cemetery Historic Park and Garden, and the publication of Cadw's urban characterisation study of Merthyr Tydfil¹⁴. These changes, along with the forthcoming update to the Buildings at Risk Register in 2016, will inform revisions to the LDP.

Natural Heritage

- 6.32 The LDP's natural heritage policies are currently meeting the annual monitoring targets and accordingly, they are considered to be functioning

¹⁴ Cadw (Welsh Government), *Merthyr Tydfil: Understanding Urban Characterisation* (2015).

effectively. Changes to the sites of importance for nature conservation (SINC) designations are however required in order to reflect surveys of coniferous woodland undertaken in 2013. As a result of the surveys, four new sites were found to meet the criteria for SINC designation and as such, require designation under Policy AS6 (Local Nature Conservation Designations) and adding to the Proposals Map. The inclusion of these sites will address the current lack of conformity with designations of coniferous woodlands as SINC in adjoining authorities.

- 6.33 A broader review of all SINC designations is also currently being undertaken by the Countryside Section in order to identify any changes to their ecological status since their initial survey and designation. This work will inform the re-designation of all existing SINC in a revised LDP.

Planning Obligations

- 6.34 A Community Infrastructure Levy (CIL) was adopted by the Council on 2nd June 2014. It is a compulsory charge that is levied against all new qualifying development.
- 6.35 The relationship between CIL and other planning obligations will need to be clarified in a revised LDP. In particular, some form of revision is likely to be required to LDP Policy BW17 (Securing community infrastructure benefits) and the planning obligation requirements of allocated development sites.

Proposals Map

- 6.36 The LDP Proposals Map contains a number of designations which are determined by mechanisms that sit outside the LDP process. Examples include areas of flood risk, listed buildings and sites of special scientific interest. The updated Local Development Plan Manual (Edition 2, August 2015) states that such designations no longer have to be included on the LDP Proposals Map and, as an alternative, can be identified on a Constraints Map (see Section 2.4, Page 16 of LDP Manual). Whilst a Constraints Map is not a statutory requirement and is not part of the LDP, the LDP should reference it and list the designations it includes.
- 6.37 The use of a Constraints Map would greatly improve the legibility of the LDP Proposals Map and would allow amendments to be made readily to take account of changes that are not determined by the LDP. A number of designations, including areas of flood risk, on the adopted LDP Proposal Map do not currently show the most up to date position and consideration will be given to the use of a Constraints Map as part of a revised LDP.

7.0 Sustainability Appraisal

- 7.1 The review of plans, policies and programmes and baseline data which informed the current adopted LDP were originally undertaken in December 2006 and reported as part of the Final Sustainability Appraisal Report (May 2011). The Habitats regulations assessment screening report was published in August 2008.
- 7.2 Since adoption of the LDP, the Council has monitored the state of the environment through monitoring sustainability objectives set out in the SEA/SA Report. The Council had found monitoring each of the indicators underpinning the sustainability objectives difficult owing to the availability and /or timeliness of various data sources, and so to present an assessment of sustainability performance in the most coherent and meaningful manner, the Council has restricted its AMR evaluation to a commentary on, and summary assessment of, each of the 15 SA Objectives.
- 7.3 Given the difficulties encountered in monitoring the state of the environment and the Plan's influence on it, and the length of time that has passed since the initial review of the environmental baseline and plans, policies and programmes in 2006, work has been undertaken to update these elements of the Sustainability Appraisal.
- 7.4 In terms of plans, policies and programmes, there has been significant contextual change since 2006. Of particular note are the introduction of the Well-being of Future Generations (Wales) Act 2015 and the Planning (Wales) Act 2015. The former introduces a definition of sustainable development and identifies well-being goals, while the latter introduces a national development framework and strategic development plans which sit above local development plans as part of the development plan system. Key national policy and guidance (Planning Policy Wales, Technical Advice Notes, Circulars and the Local Development Plan Manual) has also been revised and updated.
- 7.5 A review of the work done against current best practice and recent case law also indicates that there are areas of plan assessment which may be improved. Topics include soil, the historic environment and culture, and noise. Improvements can also be made in identifying plans at various tiers and more emphasis can be placed on identifying relevant funding programmes which help demonstrate delivery of the Plan's proposals.

- 7.6 With regard to environmental data, the baseline has changed since 2006 and the concept of an 'evolving' baseline¹⁵ whereby the evolution of the baseline is regularly monitored has been introduced. This has been undertaken as part of the annual monitoring of the SA objectives. Having reviewed the previously reported baseline against new and more recent information, it is clear the key environmental issues are not the same as in 2006. Initial observations are that a revised LDP will have different or altered environmental conditions and challenges to consider. There is also scope to refine the Sustainability Objectives against which the Plan is assessed in light of this updated information.

¹⁵ Guidance on integrating Climate Change and Biodiversity into Strategic Environmental Assessment, European Union, (2013).

8.0 Joint Plans

- 8.1 The Williams Report (January 2014) on Public Services in Wales recommends that the number of local authorities in Wales needs to be reduced to around 10 organisations in order to effectively deliver services in the future. A map published by Welsh Government indicates that, as part of this reorganisation, Merthyr Tydfil should merge with Rhondda Cynon Taff and Bridgend County Borough Councils.
- 8.2 The Planning and Compulsory Purchase Act 2004 makes provision for two or more local planning authorities to prepare a joint local development if they so wish. In addition to this, The Planning (Wales) Act 2015 now gives Welsh Ministers the power to direct local authorities to produce joint local development plans.
- 8.3 Given these contextual and legislative changes, consideration needs to be given to the issue of joint working and plan preparation with the aforementioned local authorities. While it could be argued that joint working with Caerphilly CBC should be explored based on the shared administrative boundary and related cross boundary issues, it is not considered that this would be appropriate given that Caerphilly CBC are at deposit stage in plan preparation and the fact that they are proposed to merge with other neighbouring authorities.
- 8.4 Bridgend CBC adopted its LDP in September 2013 and is not required to undertake a statutory, full review of the Plan until September 2017. They have produced two annual monitoring reports since adoption, which have concluded that the Plan is broadly working as intended and that there is no need to review the Plan at present. Consequently, working with Bridgend on LDP preparation is not an option at present, due to differing timescales in plan preparation.
- 8.5 Rhondda Cynon Taff adopted their LDP in March 2011 and accordingly, their statutory, full review was commenced in March 2015. Recent discussions with RCT CBC have indicated that they are still in the process of gathering evidence to inform which process they will follow in terms of full or short form revision of their LDP.
- 8.6 Given this current uncertainty, and the fact that the evidence contained in this Report supports a full revision of the Merthyr Tydfil LDP, a joint LDP is not considered a suitable option at present. However, as both authorities are likely to be preparing a revised LDP at a similar time, there may be scope to work

jointly on preparing key areas of evidence where there is common interest or a need to address cross boundary issues.

9.0 Conclusion

- 9.1 The findings of preceding AMRs together with the review of the evidence base and contextual changes indicate that a full revision procedure should be followed in preparing a replacement LDP.
- 9.2 The Development Strategy, which underpins the LDP, is not currently being delivered and while there are signs of improving economic conditions, there remains uncertainty over when delivery rates can reach the level necessary to meet the requirements of the Strategy. It is therefore considered that both the level and spatial distribution of growth needs to be reconsidered in order to establish whether the current Strategy is the most appropriate for delivering growth up to 2031.
- 9.3 Whilst many other aspects of the LDP are considered to be functioning effectively, contextual changes and changes to the evidence base have also resulted in the need to revise certain policies and allocations within the Plan and to reconsider the Plan's Vision, Primary Aim and Objectives.

Appendix 1: Annual Monitoring Report – Performance Summary

Quick reference to policy performance from the most recent annual monitoring report published in October 2015

Targets / objectives are being achieved.	
Targets have not been achieved but there are no concerns over the implementation of policy / objectives.	
Targets have not been achieved with resulting concern over implementation of policy / objectives.	

SO1: To capitalise on Merthyr's strategic position, further developing its role as the main commercial, service and employment centre in the Heads of the Valleys area by focusing development within the main town of Merthyr Tydfil.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Core</u> Number of new homes built in the primary growth area. (Linked to SO6)	Between 1,890 and 2,110 net completions by April 2016	1212 completions by end of March 2015		R
	At least 3,020 net completions by April 2021	--		N/A
<u>Core</u> New employment floorspace built in the primary growth area (Linked to SO7)	Between 36,490 and 40,470 sq m net floorspace by April 2016	25,494 sqm delivered at end of March 2015. 206 sqm delivered during 2013/14 0 sqm delivered during 2014/15	Greater than 14,700 sq m per annum or less than 1,834 sq m per annum for 2 consecutive years.	R R
	At least 110,080 sq m net floorspace by April 2021			N/A

<u>Core</u> New retail floorpace built in the town centre (sqm)	Approximately 1,460 sqm net floorspace by the end of 2016	No application registered	No application registered by the end of 2014	Y	
<u>Local - Town Centre Health Checks</u> i) Total annual vacant floor space in Town Centre (Vacancy rate currently at 13% - Retail, Commercial and Leisure Capacity Study, 2009)	Vacancy rate to reduce to 9% (UK average)	16.7% (2.1% increase)	Vacancy rate increasing for 1 year or remaining static above target for 2 consecutive years	R	R
ii) Percentage of A1 retail uses in primary shopping area	Maintain a percentage of at least 83%	82.3% (no change over monitoring period)	Percentage less than 83%	Y	Y
<u>Core</u> New social and community infrastructure i) Merthyr Tydfil Health Park ii) Merthyr College iii) Ysgol Santes Tudful (Linked to SO8)	Deliver by the end of 2013 Deliver by the end of 2016 Deliver by the end of 2010	Delivered Delivered Delivered	No planning application registered by the end of 2011 No planning application registered by the end of 2014	G	

SO2: To focus appropriate levels of development within the County Borough's smaller valley communities to create affordable and attractive places to live with good access to jobs and services.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Core</u> Number of new homes built in secondary growth area (Linked to SO6)	Between 280 and 320 net completions by April 2016	281 completions by end of March 2015		G
	At least 550 net completions by April 2021	--		N/A
<u>Core</u> Number of new homes built in other growth areas. (Linked to SO6)	Between 200 and 240 net completions by April 2016	43 completions by end of March 2015		Y
	At least 245 net completions by April 2021	--		N/A
<u>Core</u> New social and community infrastructure (i) Primary Health Care at Treharris (ii) Ynysowen Community Primary School (Linked to SO8)	Deliver by the end of 2010 Deliver by the end of 2010	Delivered Delivered		G

SO3. To promote regeneration through the use of suitable and appropriate brownfield land rather than greenfield sites.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Core</u> Amount of development permitted on previously developed land as a percentage of all development permitted (N.B. this would exclude householder applications and change of use from one non-residential use to another) (ha)	Maintain a percentage of at least 80% over the plan period	2014/15 – 92%	Less than 80% for 2 consecutive years	G
<u>Core</u> Amount of greenfield land lost as a result of inappropriate development on sites not allocated in the LDP	No land lost	No greenfield land lost	1 or 2 developments permitted for 2 consecutive years, or, 3 or more developments permitted in 1 year	G

SO4. To support the principle of sustainability via an energy efficient land use/ transport strategy.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Local</u> Percentage of new residential development within 400m of bus stop and 600m of primary facilities including a shop and school. (Linked to SO8)	Maintain a percentage of at least 80% over the plan period	95% of new residential developments that were granted planning permission over the monitoring period were within specified distances to local facilities	Less than 80% for 2 consecutive years	G
<u>Local</u> Percentage of new dwellings completed at: (1) less than 20 dph;	Approximately 12%	14%		

(2) 20 dph or greater and less than 25 dph; (3) 25 dph or greater and less than 30 dph; (4) 30 dph or greater and less than 50 dph; and (5) 50 dph or greater (Linked to SO6)	Approximately 13% Approximately 25% Approximately 48% Approximately 2%	0% 66% 16% 4%	More than 25% of new dwellings at less than 25 dph for 2 consecutive years	G	
<u>Core</u> Percentage of allocated sites developed (ha)	Approximately 65% of allocations developed by the end of 2016 Approximately 100% of allocations developed by the end of 2021	Approximately 32% of allocations developed by March 2015. Delivered approximately 6.7 ha over the monitoring period (Trigger level approximately 4.5 ha) --	Less than 25% of LDP phased delivery rate for 2 consecutive years	R	G
				N/A	
<u>Core</u> Percentage of total development permitted on allocated sites (ha)	Maintain a percentage of approximately 85% over the plan period	Approximately 11% of total development permitted on allocated sites over the monitoring period	Less than 80% for 2 consecutive years	R	

<u>Local</u>				
Highway network improvements				
(1) Aberfan – Merthyr Vale Link (T1)	Deliver by the end of 2011	Not delivered by end of 2011. Under construction during 2014/15	-	Y
(1) Pentwyn Road, Quakers Yard (T2)	Deliver by the end of 2021		No planning application registered by the end of 2019	N/A
(2) A472 at Fiddlers Elbow (T3)	Deliver by the end of 2021		No planning application registered by the end of 2019	N/A
<u>Local</u>				
Remodelling of Merthyr Tydfil Central Bus Station	Deliver by the end of 2016	No application registered as of March 2015	No planning application registered by the end of 2014	Y

SO5. To manage natural resources wisely avoiding irreversible damage in order to maintain and enhance their value for future generations.					
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level		
<u>Core</u> The tonnage (Mt) of primary land-won aggregates permitted in accordance with the Regional Technical Statement for Aggregates	Minimum of 3.3 Mt produced by the end of 2011	Approximately 2.9 Mt produced since 2011	Less than 1.1 Mt per annum for 2 consecutive years	Y	Y
	Minimum of 8.8 Mt produced by the end of 2016	Approximately 0.6 Mt produced in 2014			
	Minimum of 14.3 Mt produced by the end of 2021 (N.B. targets are based on joint production with Caerphilly CBC)			N/A	
<u>Core</u> Aggregates landbank	Minimum 10 year land bank maintained throughout the	Current land bank sufficient to maintain a minimum 10 year	Landbank falling below target	G	

	plan period	land bank throughout the plan period		
<u>Core</u> Amount of development (by TAN 15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN 15 tests (paragraph 6.2 i-v)	No developments permitted	No developments granted planning permission in C1 or C2 floodplain areas that do not meet all TAN 15 tests	1 or more developments permitted	G
<u>Local</u> Developments incorporating sustainable urban drainage systems (SuDS)	All developments to include SuDS where appropriate (N.B Excludes developments that have not incorporated SuDS for environmental or practical reasons)	All developments granted planning permission over the monitoring period incorporate SuDS where appropriate	1 or 2 developments permitted without SuDS for 2 consecutive years, or, 3 or more developments permitted without SuDS in 1 year	G
<u>Core</u> Amount of new licensed waste management facilities permitted	Between 1.1 and 3.2 hectares of B2 employment land developed for waste management facilities. (N.B. New facilities will be delivered in partnership with Rhondda Cynon Taf) New civic amenity site in the south of the Borough to be delivered by the end of 2016	Two new waste management facilities granted planning permission over monitoring period	No new facilities granted planning permission by the end of 2012 No planning application registered by the end of 2014	G
<u>Local</u> Landfill capacity at Trecatti	To maintain spare capacity over the Plan period	Input below maximum in 2013	Input at the maximum of 625,000 tpa for 3 consecutive years	G

SO6: To provide a range of dwelling sizes and types, including affordable and special needs housing, which support the need of the local community, attract new inhabitants to the area and create mixed and socially inclusive communities.

Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level		
<u>Core</u> Housing Land Supply	Maintain a minimum of 5 years supply (ha)	2.8 yrs	Less than a 5 year supply for 1 year	R	
<u>Core</u> Number of all dwellings built	Between 2,400 and 2,720 net completions by April 2016	1536 completions by end of March 2015	20% less or greater than LDP strategy build rate for 2 consecutive years	R	
	At least 3,800 net completions by April 2021	--		N/A	
<u>Core</u> Number of new general market dwellings built	Between 2,110 and 2,390 net completions by April 2016	1249 completions by end of March 2015	20% less or greater than LDP strategy build rate for 2 consecutive- years	R	
	At least 3,330 net completions by April 2021	75 completions during 2014/2015 --		N/A	
<u>Core</u> Number of affordable dwellings built	Between 225 and 255 net completions by April 2016	287 completions by end of March 2015	20% less or greater than LDP strategy build rate for 2 consecutive- years	Y	
	At least 350 net completions by April 2021	26 completions by during 2014/2015 --		N/A	
<u>Local</u> Number of affordable dwellings secured as a planning obligation	Approximately 130 by April 2016	39 dwellings by end of March 2015	10% Area: delivering less than 7.5% or more than 12.5% 5% Area: delivering less than 2.5% or more than 7.5%	Y	Y
		5% delivered in 10% Area.			G
	Approximately 240 by April 2021	5% delivered in 5% Area --		N/A	

<u>Local</u> Number of affordable dwellings secured through affordable housing exceptions policy	Approximately 10 by April 2016	No planning application submitted	No planning application submitted by the end of 2014	R
	Approximately 20 by April 2021	--		N/A
<u>Local</u> Average house price (Baseline: Approximately £86,900 at 2010, amended in line with Land Registry data to £73,153)	--	£63,152	+/- 10% change from base level	Y
<u>Local</u> Average income (gross weekly pay) (Baseline: Approximately £380 at 2009, amended in line with NOMIS data to £392)	--	£434.50 (+11%)	+/- 10% change from base level	Y
<u>Local</u> Vacancy rates of existing housing stock (Baseline: 6% at 2010)	--	4.5%	Vacancy rate increasing for 1 year or remaining static for 2 consecutive years	G
<u>Local</u> Preparation and adoption of Affordable Housing SPG Percentage of relevant planning applications complying with SPG	By the end of 2011 All (post SPG adoption)	SPG adopted March 2012 All applications complying		G

SO7. To improve and diversify the economy, safeguarding existing jobs and creating a range of new job opportunities in a sustainable manner.					
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level		
<u>Core</u> New B1 floorspace delivered	Between 28,500 and 30,790 sq m net floorspace delivered by April 2016	10,661 sq m delivered by end of March 2015 57 sq m delivered 2013/14 0 sq m delivered 2014/15	Greater than 7,120 sq m per annum or less than 890 sq m per annum for 2 consecutive years	R	R
	At least 53,400 sq m net floorspace delivered by April 2021			N/A	
<u>Core</u> New B2/B8 floorspace delivered	Between 7,920 and 9,680 sq m net floorspace delivered by April 2016	15,601 sq m delivered by end of March 2015 1,330 sq m delivered 2013/14 0 sq m delivered 2014/15	Greater than 7,540 sq m per annum or less than 940 sq m per annum for 2 consecutive years	Y	G
	At least 56,500 sq m net floorspace delivered by April 2021			N/A	
<u>Core</u> Minimum number of net additional jobs delivered	Between 1,800 and 1,980 jobs delivered by April 2016	1318 jobs delivered by end of March 2015 220 jobs delivered 2014/15	Greater than 592 jobs per annum or less than 74 jobs per annum for 2 consecutive years	G	G
	At least 4,440 jobs delivered April by 2021			N/A	
<u>Local</u> Developments granted planning permission that result in a loss of employment land within employment sites protected	No loss of employment land on protected employment sites except where justified within the terms of the policy	No unjustified loss of employment land	1 or 2 developments granted planning permission for 2 consecutive years, or, 3 or more developments granted planning permission in 1	G	

under Policy AS24			year		
<u>Local</u> Percentage of economically active people in employment (Baseline: 64% at 2009)	Approximately 74% by the end of 2016 Approximately 80% by the end of 2021	68.2% for 2014/15 (+3.3%)	Reduction of 5% or failure to increase for 2 consecutive years.	Y	G
				N/A	
<u>Local</u> Vacancy rates of existing employment buildings (Baseline vacancy figures as of 2009: B1 = 5.6%; B2/B8 = 9.7%)	Maintain vacancy rate within range of 5-10% of existing stock	17%	+ or – 2.5% beyond range for 2 consecutive years	Y	

SO8. To promote social inclusion and ensure equality of opportunity through reducing the need to travel and providing better access by sustainable means to employment opportunities, community facilities and services.					
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level		
<u>Local</u> Number of community facilities lost through change of use	No loss of viable community facilities below identified need (except where justified within terms of policy)	No unjustified loss of a community facility	1 or 2 community facilities lost for 2 consecutive years, or, 3 or more community facilities lost in 1 year	G	
<u>Local</u> Amount of planning obligations secured on allocated housing developments	Secure contributions on 33 (67%) of the allocated housing developments	No allocated sites failing to secure identified contributions.	1 or 2 sites failing to secure planning obligations for 2 consecutive years, or, 3 or more sites failing to secure planning obligations in 1 year	G	
Percentage of relevant planning applications complying with SPG	All (Post SPG adoption)	All applications complying	-	G	

SO9. To promote health and wellbeing by providing accessible and varied opportunities for leisure and recreational activities.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Local</u> Amount of public open space, including play space and informal recreational areas, lost to development (ha) which is not allocated in the development plan.	No loss below identified need.	0.05 ha loss	-	G
<u>Local</u> New leisure/recreational development ii) Parc Taf Bargoed	Deliver by the end of 2016	Development delivered	No planning application by the end of 2014	G

SO10. To ensure good quality design of new development and the creation of safer communities.				
SO12. To contribute towards reducing the impact of climate change through reduced carbon dioxide emissions in new developments.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Local</u> Percentage of relevant schemes incorporating "secured by design principles"	All major applications	All major applications granted planning permission incorporate "secured by design principles"	-	G
<u>Local</u> Preparation and adoption of Sustainable Design SPG	By the end of 2012	SPG adopted July 2013	-	G
<u>Local</u>	All (Post SPG	All relevant applications	-	G

Percentage of planning applications complying with sustainable design SPG	adoption)	complying with SPG		
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SO11. To ensure the continued protection and enhancement of the natural, cultural, built and historic environment.				
Core and Local Indicators	Policy Targets	Policy Achievement	Trigger Level	
<u>Local</u> Developments granted planning permission that do not preserve or enhance scheduled ancient monuments, registered historic parks and gardens, listed buildings or conservation areas	No developments that would fail to preserve or enhance heritage features granted planning permission	No developments granted planning permission failed to preserve or enhance heritage features	1 or 2 developments failing to preserve or enhance features for 2 consecutive years, or, 3 or more developments failing to preserve or enhance features in 1 year	G
<u>Local</u> Developments granted planning permission that cause harm to the overall nature conservation value of SINCs or the LNR	No developments that would cause harm to the overall nature conservation value of SINCs or the LNR granted planning permission	No development that would cause harm to the overall nature conservation value of SINCs of the LNR granted planning permission	1 or 2 developments resulting in overall harm for 2 consecutive years, or, 3 or more developments resulting in overall harm in 1 year	G
<u>Local</u> Developments granted planning permission that cause harm to a SSSI	No developments that would cause harm to a SSSI granted planning permission	No developments that would cause harm to a SSSI granted planning permission	1 or more developments resulting in harm to a SSSI	G

Appendix 2: Delivery of LDP Allocations

Allocation	Site Name	Number of Units	Status
H1	Sweetwater Park, Trefechan	26	Under construction - revised final phase increases number of units to 35. Development due to be complete by 2017.
H2	Trevor Close, Pant	28	Development of 28 allocated units yet to commence on site. Application recently received for additional 23 units on adjacent land.
H3	Beacon Heights	153	Under construction - lower density development has resulted in site accommodating 135 units in total. Final phase of permitted 15 units yet to commence on site.
H4	Bryngwyn Farm, Swansea Road	75	Delivered 2014/15
H5	Adj Twyncarmel Shop	11	Delivered 2009/10
H6	Clwydyfagwr, Swansea Road	50	No planning application received.
H7	Cyfarthfa Mews, Swansea Road	47	Under construction - due to be complete 2017.
H8	Gellideg Flats	53	Site has full permission for housing association offices and refurbishment of existing flats. Further land available for residential development, but will be of a smaller scale with 26 units anticipated.
H9	South of Castle Park, Tywncarmel	160	No planning application received.
H11	Winchfawr	30	Single unit delivered. No application received for the remainder of the site.
H12	Brecon View Park, Heolgerrig	150	Delivered 2010/11
H13	Cwmglo Road, Heolgerrig	50	Delivered 2013/14
H14	Brondeg, Heolgerrig	70	Part of site has outline permission.
H15	Upper Georgetown Plateau	70	No planning application received.
H16	Lower Georgetown Plateau	131	Delivered 2010/11
H17	Former Vulcan Brewery, Brecon Road	20	Delivered 2011/12 - 100% affordable housing site.
H18	Gwaelodygarth House	20	Under construction – due to be complete by 2016/17.
H19	Goitre Lane, Gurnos	190	No planning application received.

H20	St Tydfil's Hospital	60	Site has been cleared. No planning application has been received for residential development.
H21	Penydarren Reservoir	33	Delivered 2008/09 - 100% affordable housing site.
H22	r/o Haydn Terrace, Penydarren	70	No planning application received.
H23	Project Heartland, Dowlais	450	Site has outline permission – due to lapse September 2017.
H24	Dowlais Flats	38	Delivered 2008/09 - 100% affordable housing site.
H25	Goatmill Road	160	No planning application received.
H26	North of Bradley Gardens, Penyard	110	No planning application received.
H27	Queens Exchange, Penyard	260	Delivered 2012/13
H28	Former Twynyrodyn Junior School	24	Delivered 2009/10 - 100% affordable housing site.
H29	Twynyrodyn	180	No planning application received
H30	Former Mardy Hospital	125	Under construction – first phase (69 units) to be complete by end of 2017.
H31	Rhydyar Leisure Village	24	Site has outline planning permission in 2015.
H32	The Greenie, Penydarren	60	No planning application received.
H33	Gethin Tip, Abercanaid	150	No planning application received.
H34	Rocky Road, Penydarren	19	Delivered 2015/16
H35	Former Rugby Club, Ynysfach	13	Delivered 2010/11
H36	P & R Motors, Pentrebach	24	Outline application currently under consideration.
H37	Mount Pleasant, Troedyrhiw	10	No planning application received.
H38	r/o Oakfield Street, Aberfan	50	No planning application received.
H39	Project Riverside	150	Site has outline planning permission – currently being marketed.
H40	Grays Place, Merthyr Vale	10	No planning application received.
H41	r/o Pleasant View, Bedlinog	10	No planning application received.
H42	Cwmfelin, Bedlinog	18	Site has outline planning permission – due to lapse April 2016.
H43	North of Twynygarreg Road, Treharris	25	Under construction – final phase of 9 units to commence summer 2016.
H44	Oaklands, Treharris	85	No planning application received.
H45	Cilhaul, Treharris	50	No planning application received.
H46	Millbrook, Quakers Yard	54	Delivered 2008/09

H47	Ty Llwyd Parc, Quakers Yard	20	Delivered 2010/11
H48	adj Shingrig Estate, Trelewis	300	Under construction - approximately 130 units to be completed by April 2016.
H49	Maen Ganol, Trelewis	30	No planning application received.
H50	Rahbers Corner, Treharris	18	Delivered 2010/11- 100% affordable housing site.

Employment

Allocation	Site Name	Site Area (Hectares)	Status
E4	Goatmill Road	9.98	No planning application received.
E5	Ffos y Fran	11.2	No planning application received.
E6	Rhydycar Business Park	4.65	Predominantly delivered. Approximately 1.77 hectares of land remaining.
E8	Car Park, Hoovers		No planning application received.

Transport Network improvements

Allocation	Site Name	Status
T1	Aberfan - Merthyr Vale Link -	Delivered - December 2015
T2	Pentwyn Road, Quakers Yard -	No planning application received.
T3	A472, Fiddlers Elbow -	No planning application received.
-	Remodelling of central bus station	Planning application received for the relocation of the central bus station to Swan Street.

Life-long learning facilities

Allocation	Site Name	Status
LL1	Merthyr Tydfil College	Delivered - September 2013
LL2	Ysgol Santes Tudful, Penyard	Delivered - September 2010
LL3	Ynysowen Community School	Delivered - September 2010

Valleys Regional Park

Allocation	Site Name	Status
-	Cyfarthfa Park	Various projects have been delivered in both parks enhancing their leisure and tourism provision.
-	Parc Taf Bargoed	

New Leisure Development

Allocation	Site Name	Status
L1	Rhydycar Leisure Village	Delivered – initially opened 2008

Retail

Allocation	Site Name	Status
R1	Merthyr Tydfil Central Bus Station	No planning application received. Site will become available when new Bus Station is relocated to Swan Street.

Community Health Facilities

Allocation	Site Name	Status
CH1	Keir Hardie Health Park, Georgetown	Delivered - September 2012
CH2	Primary Health Care Centre, Treharris	Delivered – 2009

Appendix 3: Summary of whether policies are functioning effectively and whether changes are likely to be necessary

Borough Wide Policies		Comment
Policy BW1	Development Strategy – Primary Growth Area	Review as part of reconsideration of development strategy.
Policy BW2	Development Strategy – Secondary Growth Area	Review as part of reconsideration of development strategy.
Policy BW3	Development Strategy – Other Growth Areas	Review as part of reconsideration of development strategy.
Policy BW4	Settlement boundaries/locational constraints	Functioning effectively – minor amendments may be required.
Policy BW5	Natural Heritage	Functioning effectively – minor amendments may be required.
Policy BW6	Townscape and built heritage	Functioning effectively – minor amendments may be required.
Policy BW7	Sustainable design and placemaking	Functioning effectively – minor amendments may be required.
Policy BW8	Development and the water environment	Functioning effectively – minor amendments may be required.
Policy BW10	Mineral safeguarding	Functioning effectively – minor amendments required.
Policy BW11	Transport, cycling and pedestrian proposals	Functioning effectively – minor amendments required.
Policy BW12	Development proposals and transport	Functioning effectively – minor amendments may be required.
Policy BW13	Managing housing growth	Review as part of reconsideration of development strategy.
Policy BW14	Managing employment growth	Review as part of reconsideration of development strategy.
Policy BW15	Community Facilities	Functioning effectively – minor

		amendments may be required.
Policy BW16	Protecting/enhancing the network of leisure facilities	Functioning effectively – minor amendments may be required.
Policy BW17	Securing community infrastructure benefits	Functioning effectively – minor amendments required.
Policy BW18	Contaminated land	Functioning effectively – minor amendments may be required.
Policy BW19	Affordable housing target	Revise based on updated LHMA and viability assessments.

Area Specific Policies		Comment
Policy AS1	Housing allocations in the Primary Growth Area	Revise – Certain housing allocations delivered and a review of undeveloped sites required.
Policy AS2	Housing allocations in the Secondary Growth Area	Revise – Certain housing allocations delivered and a review of undeveloped sites required.
Policy AS3	Housing allocations in Other Growth Areas	Revise – A review of undeveloped sites required.
Policy AS4	Historic Landscape	Functioning effectively – minor amendments may be required.
Policy AS5	Green Wedges	Functioning effectively – minor amendments required.
Policy AS6	Local nature conservation designations	Functioning effectively – minor amendments required.
Policy AS7	Waste management facilities – locations of choice	Revise in light of changes to national policy.
Policy AS8	Replacement civic amenity site	Delete – no longer required.
Policy AS9	Strategic highway improvement	Functioning effectively – minor amendments may be required.
Policy AS10	Core highway network	Revise – development

	improvements	delivered.
Policy AS11	Public transport – rail	Functioning effectively – minor amendments may be required.
Policy AS12	Public transport – road	Revise – Central bus station to be relocated to Swan Street.
Policy AS13	Life-long learning facilities	Delete – developments delivered.
Policy AS14	Employment allocations in the Primary Growth Area	Revise – Certain employment allocations delivered and a review of undeveloped sites required.
Policy AS15	Key contributors to the Valleys Regional Park	Functioning effectively – minor amendments may be required.
Policy AS16	New leisure development	Delete – development delivered.
Policy AS17	New outdoor sport/play space	Revise – developments delivered.
Policy AS18	Retail hierarchy	Functioning effectively – minor amendments may be required.
Policy AS19	Merthyr Tydfil Town Centre	Functioning effectively – minor amendments may be required.
Policy AS20	Retail allocations	Review as part of updated retail requirements.
Policy AS21	Community health facilities	Delete – development delivered.
Policy AS22	Affordable housing contributions	Revise based on updated LHMA and viability assessments.
Policy AS24	Employment site protection	Functioning effectively – minor amendments may be required.

Topic Based Policies		Comment
Policy TB5	Special needs housing	Functioning effectively – minor amendments may be required.
Policy TB6	Static caravans, residential mobile homes and gypsy traveller accommodation	Functioning effectively – minor amendments may be required.
Policy TB7	Renewable energy	Review in light of changes to national policy.
Policy TB8	Mineral proposals	Functioning effectively – minor amendments may be required.
Policy TB9	Mineral buffer zones	Functioning effectively – minor amendments required.
Policy TB10	Waste management facilities	Functioning effectively – minor amendments may be required.
Policy TB11	Access, parking and accessibility of local facilities	Functioning effectively – minor amendments may be required.
Policy TB12	Freight traffic	Functioning effectively – minor amendments may be required.
Policy TB13	Exception sites for affordable housing in the countryside	Review based on updated LHMA and viability assessments.

*Please note that the above assessment is not definitive and further consideration will be given to amending local policies as part of the plan revision process, including consideration of their need alongside national development management policies contained in Planning Policy Wales (Edition 8, January 2016).



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