

# **Merthyr Tydfil County Borough Council Local Development Plan (2016 – 2031)**

## **PRE-DEPOSIT PROPOSALS DOCUMENT 2 INITIAL SUSTAINABILITY APPRAISAL REPORT NON-TECHNICAL SUMMARY**

June 2017



**Planning and Countryside Department**  
Merthyr Tydfil County Borough Council  
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## **1. Introduction**

- 1.1 This document is the Non-Technical summary of Merthyr Tydfil County Borough Council's Initial Sustainability Appraisal (SA). The SA tests what are the likely economic, environmental and social effects of employing the Preferred Strategy and seeks to minimise any negative effects and maximise any positive effects.

## **2. The Local Development Plan**

- 2.1 All Local Planning Authorities (LPAs) must prepare an up-to-date Local Development Plan (LDP) for their area. The plan should provide the context for how communities will grow and develop in the future. They aim to offer certainty for communities and investors alike about where development and the types of development should and should not take place on land in the area.
- 2.2 LDPs are monitored annually to establish if they are working as intended. Up to date LDP's 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 the plan remains up-to -date, the Council is required to undertake a full review of the adopted LDP every four years. The Merthyr Tydfil LDP 2006 -2021 was adopted in May 2011<sup>1</sup>. In April 2016, the Council approved the preparation of a replacement LDP to cover the period 2016 – 2031. When adopted by the Council it will provide the policy framework for the development and use of land within the County Borough. However, before the plan can be finalised, a draft (Pre-Deposit) Plan, known as the Preferred Strategy (PS)<sup>2</sup> must be written and agreed.

## **3. The Preferred Strategy**

- 3.1 The Council has prepared a PS, which sets out the broad approach that the LDP intends to take in order to ensure that the County Borough is developed in a sustainable manner. This means providing the best way to make land use decisions. Such decisions can affect the lives of people living and visiting the County Borough. The strategy tries to balance the necessity for growth against the necessity to sustain finite resources needed to meet the needs of future generations.

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<sup>1</sup> The Merthyr Tydfil Local Development Plan 2006 -2021, May 2011

<sup>2</sup> The Merthyr Tydfil Local Development Plan – Preferred Strategy 2016-2031, July 2017

### 3.2 The PS includes:

- ◆ **A Vision<sup>3</sup>:** a description containing social, economic, environmental and cultural goals;
- ◆ **Objectives:** for providing land-use opportunities to improve people's economic social, environmental and cultural well-being;
- ◆ **Growth Options:** Options for different amounts of future growth in population, housing and employment up to 2031;
- ◆ **Spatial Options:** Options for where to locate housing and employment and
- ◆ **Policies:** measures needed to achieve the vision and objectives and help guide future land- use development decisions.

## 4. Candidate Sites Register and Joint Housing Land Availability Study (JHLAS)

- ◆ **Candidate Sites:** sites put forward by anyone for consideration by the LPA, which are included on a Candidates Sites Register but may or may not be included as development sites in the LDP.
- ◆ **The Merthyr Tydfil JHLAS for 2016** presents the housing land supply for the area at the base date of 1st April 2016 and assesses the likelihood of housing completions occurring in the next 5 years on 45 sites throughout the County Borough.

## 5. SA & Strategic Environmental Assessment (SEA)

- 5.1 As part of the LDP process, the Council must carry-out a SA of the Plan<sup>4</sup>, which must also include a Strategic Environmental Assessment (SEA)<sup>5</sup>. This combined SA and SEA process, is known as the SA.
- 5.2 As part of the SA process, the Council has looked at the likely significant economic, environmental and social effects of the PS and has aimed to minimise any likely negative effects and maximise any positive ones. The process also includes Health, Equalities and Welsh Language Impact Assessments. A separate Habitats Regulations Assessment (HRA)<sup>6</sup> has also been carried out.

<sup>3</sup> Taken from the emerging Local Well-being Plan – prepared by the Local Service Board as required by the Well-being of Future Generations (Wales) Act 2015

<sup>4</sup> As required by the Compulsory Purchase Act 2004 and Town and Country Planning (LDP) (Wales) Regulations 2005.

<sup>5</sup> As required by the SEA Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004)

<sup>6</sup> The Conservation of Habitat and Species Regulations 2010

## 6. The Stages of the SA

- 6.1 The SA must be carried out in five stages as set out in the Welsh Government LDP Manual<sup>7</sup> as follows:

<b>Table 1:</b> SA stages: The five main stages in conducting an SA that need to be integrated into LDP preparation	
<b>Stage 1</b>	Setting the context and objectives, establishing the baseline and deciding on the scope
<b>Stage 2</b>	Developing and refining options and assess effects
<b>Stage 3</b>	Preparing the SA Report
<b>Stage 4</b>	Consultation on the PS and SA Report
<b>Stage 5</b>	Monitoring the significant effects of implementing the LDP

- 6.2 The Council has completed Stage 1, with publication of the SA Baseline Scoping Report<sup>8</sup>. The report was sent out to Statutory Consultees, in November 2016 and amended in the light of comments received. The full version of the Initial SA Report completes Stage 2, and consultation on that document completes Stage 3 and the early part of Stage 4.

## 7. The SA Baseline Scoping Report

- 7.1 During 2016, the Council began gathering data about the County Borough's economic, social, environmental and cultural condition, from key policies, programmes and plans produced at International, national and local level. This information was put together in the SA Baseline Scoping Report. All the evidence gathered for the report was assessed and the following key sustainability issues and opportunities, affecting the County Borough identified are set out in Table 2.

<sup>7</sup> Local Development Plan Manual 2015

<sup>8</sup> Sustainability Appraisals (incorporating Strategic Environmental Assessment, Health Impact Assessment and Equalities Impact Assessment) – Final SA Baseline Scoping Report, January 2017

**TABLE 2:** Key Sustainability Issues/Opportunities for Merthyr Tydfil County Borough Council

✱	Existing community services and facilities such as education, health and leisure will need to manage the changes in population, or new services and facilities will be needed.
✱	Development proposals could lead to coalescence of settlements or significantly change the characteristics of a community.
✱	The latest Welsh Government population projections indicate that population is set to decline from 2024 onwards and that working aged people are moving elsewhere in the UK.
✱	The level of deprivation is higher in the north of the County Borough and some wards do not have enough access to quality open space.
✱	The need for more social, affordable and older persons housing. .
✱	The quality and energy efficiency of the existing housing 'stock'. Better quality housing will need to be built.
✱	Very little new development has been built on employment land over the past 5 years. The number of vacant commercial units is above the Wales average.
✱	The number of people who walk or cycle for trips of less than 5km is low, walking and cycling routes are not well connected and east-west travel is difficult.
✱	A new central bus station is proposed. The South Wales Metro project will improve access to Cardiff. Rail could be used to transport raw materials. A good network of waste facilities exists.
✱	Home energy use is the primary cause of local GHG <sup>9</sup> , emissions. More renewable energy sources are needed.
✱	Climate change puts pressure on species, habitats and water resources. Transport fuel use is the secondary cause of local GHG; Twynrodyn Hill has been declared an Air Quality Management Area (AQMA). Longer summers have increased the tourist season.
✱	The presence of a wide range of threatened species and habitats. Some green corridors and green spaces do not link together.
✱	Improvement is needed to ground, surface and water bodies in particular The Nant Morlais, due to a decline in water quality.
✱	Parts of the Town Centre are identified as being at risk from flooding.
✱	National and local heritage designations based on past iron and coal industries need sensitive conservation.
✱	Mineral resources located outside of settlements are protected. The Ffos-y-fran land reclamation scheme is on-going and some other mineral reserves still have permission.
✱	At less than 10%, the number of people that can communicate in Welsh is below the Wales average.
✱	High quality landscape areas, prominent views and traditional field boundaries need to be protected.

<sup>9</sup> Greenhouse Gas (GHG) - a gas that traps heat in the atmosphere, like glass in a greenhouse, (by absorbing and emitting radiation within the thermal infrared range) and thereby making the earth warmer

## 8. The SA Framework

8.1 From the above issues, 18 sustainability objectives were created. These formed the basis of the SA and were used to assess whether the PS is likely to have a significant effect on the social, economic, environmental and cultural issues as follows:

1. To ensure that the community and social infrastructure needs of all residents and communities are met.
2. To maintain and enhance community and settlement identities.
3. To support a sustainable level of population growth.
4. To improve human health and well-being and reduce inequalities.
5. To meet the housing needs of all through a mix of dwelling tenures and types.
6. To improve the overall quality and energy efficiency of the housing stock.
7. To enhance the attractiveness of the County Borough to support economic development.
8. To reduce the need to travel and encourage sustainable modes of transport.
9. To ensure essential utilities and infrastructure are available to meet the needs of all.
10. To minimise energy use and optimise opportunities for renewable energy generation.
11. To minimise the contribution to climate change whilst maximising resilience to it.
12. To maintain and enhance biodiversity and ecosystem connectivity.
13. To minimise the demand for water and improve the water environment.
14. To minimise the risk of flooding.
15. To protect and conserve soil and safeguard mineral resources.
16. To protect and enhance heritage assets which define the County Borough as the most significant Welsh town of the Industrial Revolution.
17. To facilitate services and facilities that support distinctive local culture and the Welsh language.
18. To protect and enhance the quality of designated areas of landscape value and good quality townscapes.

## 9. What has been assessed so far?

- ◆ Vision
- ◆ Objectives
- ◆ Growth Options
- ◆ Spatial Options
- ◆ Policies and
- ◆ Candidate and Joint Housing and Land Availability (JHLAS) Sites.

## 10. The Appraisal Methodology

10.1 The SA of the draft PS Strategy was carried out in-house by officers of the council by using a set of Matrices.

10.2 Matrix 1 was used to assess the likely significant effects of the objectives.

10.3 Matrix 2 was used to assess the likely effects of the Growth and Spatial options, together with a set of 'decision –aiding' questions (see Full Initial SA Report) created as part of the Baseline Scoping Report.

10.4 Matrix 3 was used to assess the likely significant effects of the policies.

10.5 Matrix 4 is used to assess the likely effects of the Candidate and JHLAS Sites.

Matrix 1: SA of PS Objectives																		
Compatibility of PS Objectives with SA Objectives																		
Symbol	++ Positive				+ Compatible				0 Neutral	? Uncertain		- Potential c		-- Incompatible				
SA Objec	PS Social Objectives,							PS Cultural Objectives		PS Environmenta Objectives		PS Economic Objectives						
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
1																		
2																		
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Matrix 2: SA of Growth & Spatial Options				
Categories of Significance				
Symbol	Meaning	Sustainability Effect	Assessment	
++	Major Positive	Would resolve existing sustainability issues	Actively encouraged	
+	Minor Positive	No sustainability constraints	Acceptable	
0	Neutral	Neutral effect		
?	Uncertain	Potential sustainability issues	Mitigation/compensation possible	
-	Minor Negative	Would result in sustainability issues	Mitigation/ compensation likely to be difficult and/or expensive	
--	Major Negative	Known sustainability issues/constraints	Problematical and improbable	
Summary Assessment Table SA of Growth & Spatial				
SA Objective	Assessment of effects	Option		
		Description of Option 1	Description of Option 2	Description of Option 3
1	Narrative describing likely significant effects; possibilities for mitigating negative effects & enhancing positive effects; residual effects; comparative assessment; supported by baseline evidence where available; uncertainty and any key gaps in information; and any recommendations for plan-making.			
2				
3				
4				
5				
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10				
11				
12	Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty.			
13				
14				
15				
16				
17				
18				

Matrix 3: SA of PS Polices																												
Compatibility of PS Policies with SA Objectives																												
Symbol		++ Positive				+ Compatible				0 Neutral				? Uncertain				- Potential conflict				-- Incompatible						
SA Objectives	PS Social Policies														PS Cultural Policies	PS Environmental Policies				PS Economic Policies								
	1	2	3	4	5	6	7	8	9	10	11	12	13	14		15	16	17	18	19	20	21	22	23	24	25	26	27
1																												
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Matrix 4: SA of Candidate and JLHAS Sites - Cluster of site options by Ward																			
Symbol	++ Positive			+ Compatible			0 Neutral			? Uncertain			- Potential conflict			-- Incompatible			
Candidate Sites by Ward	SA Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
	Bedlinog: 1-7																		
	Cyfarthfa: 8-30																		
	Dowlais: 31-41																		
	Gurnos:42-43																		
	Merthyr Vale:44-48																		
	Park:49-57																		
	Penydarren: 58-59																		
	Plymouth: 60-78																		
	Town:79-93																		
	Treharris: 94-97																		
	Vaynor: 98																		
Appraisal Summary: Narrative reporting of significant effects for individual sites, cumulative effects, any uncertainties, mitigation and SA.																			

10.6 The results of the each assessment can be found in the Initial SA Report where the detailed completed matrices are attached as Appendices.

## 11. SA of the Vision

11.1 Broadly speaking, the vision performs well against the majority of the SA Objectives, particularly against those relating to Communities, Housing and Economy and Employment.

## 12. SA of the PS Objectives

12.1 The purpose of the PS objectives is to set out how the vision will be delivered by providing overarching guiding principles to guide land-use opportunities to improve people's economic social, environmental and cultural well-being.

They set the context for the development of the Growth and Spatial Options, and provide the framework from which the PS policies can be built.

- 12.2 The objectives contained in the Merthyr Tydfil LDP 2006 – 2021, were revised and up-dated in the light of the latest version of Planning Policy Wales<sup>10</sup> and specifically target key sustainability issues raised in the Baseline Scoping Report, as outlined above.
- 12.3 The PS contains 17 objectives grouped under the headings Social, Cultural, Environmental and Economic. The objectives were tested against the SA objectives which found that all of the PS objectives have successfully integrated sustainability principles. Therefore, none of them are incompatible when tested against the SA objectives, in particular in relation to the social and economic objectives of the PS and where PS and SA objectives deal with the same specific issues such as landscape and biodiversity.

### 13 SA of the Growth and Spatial Options

- 13.1 Several options were considered as part of the preparation of the PS and their impacts were identified using the SA framework.

Different levels for future growth:

- ◆ High: Continuation of the Existing Enhanced Growth Strategy<sup>11</sup>: building over 200 homes a year (increasing the population by 15% by 2021)
- ◆ Low: Planning for decline: building approximately 20-30 dwellings per annum (lowering the population by 0.5% 2031).
- ◆ Medium: Sustainable population growth: building along the lines of historic build rates of 150 dwellings per annum (increasing the population by 8% by 2031).

- 13.2 It is considered that continuing with the enhanced growth strategy could result in increased pressure on facilities, natural resources and undeveloped land. Additionally, it could result in the loss of open space, habitat fragmentation, increased congestion and reduction in air quality.
- 13.3 Planning for decline could result in the inefficient use of land, loss of facilities, a lack of investment and of housing choice and isolation of communities. In the longer term this could mean increases in unemployment, and deprivation.

<sup>10</sup> Planning Policy Wales (PPW) – edition 9 November 2016

<sup>11</sup> In the Merthyr Tydfil LDP -2006 -2021, May 2011

- 13.4 The preferred sustainable growth option would support retention of the working aged population, retention of community identities and facilities and is likely to provide a range of dwelling types and jobs. It would also offer investment, town centre regeneration and opportunities for sustainable transport modes.

Different broad locations for housing and employment growth:

- ◆ Urban extension and other small sites;
- ◆ Dispersal of small sites cross the County Borough.
- ◆ Strategic large brownfield site and other small sites.

- 13.5 Although the urban extension option could retain working aged people and deliver a range of housing and facilities, it would require more infrastructure, a greater need to travel and higher energy use. In addition it would adversely affect a Site of Scientific interest (SSSI), Landscape of Historic Interest and access to coal reserves.

- 13.6 The dispersal option would enable the right amount of housing and employment to be built but it could be more costly and more work would be needed to create a sustainable transport network. There would also be more negative impacts on the natural environment.

- 13.7 The preferred large brownfield site option would act as a hub for transport and transport links throughout the County Borough. Spreading small developments throughout the area would enable new facilities in existing communities, and improvements to existing facilities such as schools.

## **14 SA of Policies**

- 14.1 The council developed 28 General Policies structured under topic headings linked to the Objectives. The policies were tested against the SA objectives and were considered to be positive overall. In particular the distribution and location of housing sites is likely to result in a lesser effect on greenfield land, and may actually result in some contaminated, previously developed land being remediated. Surprisingly, environmental policies scored well since growing the population sustainably ensures that the population has access to good quality open space and improvements to the natural environment makes it more attractive to investment.

- 14.2 Some of the more uncertain findings of the assessment were on policies that proposed some form of built development, and their effect on issues such as water, climate change, ecology and landscape. For example, policies promoting renewable energy technology and mineral extraction conflict with objectives relating to ecology, countryside and landscape. Therefore the key in ensuring that any conflict with environmental considerations is minimised and can be mitigated/compensated will be the precise wording of the policies covering these issues in the Deposit Plan.
- 14.3 However, the actual success of the policies will be related to how robustly and effectively they are implemented once the LDP has been adopted. This will be an issue that will need to be closely monitored throughout the life of the Plan.

## **15 Summary of SA of Candidate and JHLAS Sites**

- 15.1 There is a relatively high number of Candidate & JHLAS sites located in Cyfarthfa, Plymouth and Town wards resulting in potentially high development pressure. However, due to their proximity to services and facilities they score well on social objectives.
- 15.2 The sites generally proposed for housing are located within an area experiencing Multiple Deprivation, or nearby existing urban areas in Dowlais, Gurnos and Merthyr Vale and generally score favourably with regard to social objectives.
- 15.3 There is an element of uncertainty in relation to potential negative effects on landscape in some sites outside settlement limits in Merthyr Vale and greenfield land in Gurnos and Cyfarthfa ward in particular their proximity to SSSIs & SINCs and as such score negatively on environmental objectives.
- 15.4 Sites in Park, Penydarren and Vaynor Wards generally score favourably due to their proximity to schools, good bus services, local services and facilities nearby such as Cyfarthfa Park, the Taff Trail, Merthyr Tydfil town centre and active travel routes, existing built development and the brownfield nature of the sites.

## **16 Analysis of the Appraisals**

How the SA has influenced the PS

- 16.1 The systematic appraisal of the various components that make up the PS assisted in the development of the series of strategic objectives consistent with the sustainability framework set out in the SA Scoping Report. This included the appraisal of the strategic options that informed the identification of the Draft PS so that the LDP will be best placed to address the likely key economic, social,

environmental and cultural issues affecting the Merthyr Tydfil County Borough area. At this stage, the SA has assisted in the development of core strategic policies for the LDP and seeks to mitigate any likely significant negative impacts resulting from the PS.

#### Likely Significant Effects of the PS

- 16.2 As the plan progresses a better judgement can be made on any precise negative impacts of the LDP on the SA objectives and ways to mitigate or enhance them, although the precise detail of these measures will need to be fleshed out later in the Plan process. A summary appraisal of any LSEs identified by the Initial SA process is set out as follows:

<b>Table 3: Analysis of the Appraisals of the Preferred Strategy (PS)</b>		
Preferred Strategy	Likely Significant Effects	Consideration of ways to mitigate negative impacts
Vision	Broadly speaking, the vision performs well against the majority of the SA Objectives, particularly against those relating to Communities, Housing and Economy and Employment, which is to be expected for a plan proposing a sustainable level of population growth and the anticipated development associated with such a strategy.	Since the vision sets an overarching framework for development, ways to resolve conflicts and or mitigate any likely negative effects will be addressed through assessment of the PS policies and emerging LDP proposals.
Objectives	When tested against the SA objectives it was found that all of the PS objectives have successfully integrated sustainability principles. This means that none of them are incompatible, in particular in relation to the social and economic objectives of the PS and where PS and SA objectives deal with the same specific issues such as landscape and biodiversity.	Since the objectives form part of an overarching framework, ways to resolve conflicts and or mitigate any likely negative effects will be addressed through assessment of the PS policies and emerging LDP proposals.
Sustainable Growth option	There are uncertainties with issues such as climate change, and energy and water usage. This is to be expected with any plan proposing growth, particularly at this relatively early stage.	<ul style="list-style-type: none"> <li>◆ Safeguarding areas of land for renewable energy proposals.</li> <li>◆ Use of green infrastructure to mitigate climate change.</li> <li>◆ Protective water management methods could be put in place.</li> </ul>
One Strategic brownfield site and	There will be some conflict with environmental considerations. The level of development proposed will require mitigation in terms of the	Building and design standards have evolved in a way which will help to minimise the impact on the

other small sites Spatial Option	effect on the water environment.	water environment. The dispersed nature of the small sites increases the likelihood that this mitigation can be achieved.
Policies	Some of the more uncertain findings of the assessment were on policies that proposed some form of built development, and their effect on issues such as water, climate change, ecology and landscape.	The key in ensuring that any conflict with environmental considerations is minimised and can be mitigated / compensated will be the precise wording of the policies covering these issues in the Deposit Plan.
Conclusion	Broadly speaking when tested against the SA objectives the PS successfully integrates sustainability principles. However, there are some conflicts with environmental considerations.	As the plan process moves forward, greater levels of detail will be known which will enable a better judgement to be made on the precise impact of the LDP on the SA objectives.

## 17 The Next Steps

- 17.1 The Initial Sustainability Appraisal Report will be used to inform preparation of a full SA report and Deposit version of the Replacement LDP 2016 – 2031. On adoption of the final version of the replacement plan, Merthyr Tydfil County Borough Council will publish an 'SEA Statement' which will explain how the SA has influenced the LDP.



## 18 How to comment on the Initial Sustainability Report

- 18.1 The consultation period runs from 14<sup>th</sup> July to 25<sup>th</sup> August 2017. Consultation on the initial Sustainability Appraisal of the Candidate Sites will take place later in 2017.
- 18.2 Comments made on the Initial Sustainability Report must be made in writing and received by the County Borough Council by 12 midday 25th August 2017.
- 18.3 All comments made by the deadline will be acknowledged and considered, however the Council cannot guarantee that comments received after this date will be considered.
- 18.4 Comments forms and all pre-deposit documents are available at the following locations:
- ◆ Council Offices, Civic Centre, Castle Street, Merthyr Tydfil, CF47 8AN
  - ◆ Council Offices, Unit 5, Triangle Business Park, Pentrebach, Merthyr Tydfil, CF48 4TQ
  - ◆ Merthyr Tydfil Central Library, High Street, Merthyr Tydfil, CF47 8AF
  - ◆ Dowlais Library, Church Street, Dowlais, Merthyr Tydfil, CF48 3HS
  - ◆ Treharris Library, Perrott Street, Treharris, Merthyr Tydfil, CF46 5ET
  - ◆ Aberfan Community Library, Pantglas Road, Aberfan, Merthyr Tydfil, CF48 4QE
  - ◆ Rhydycar Library Hub, Merthyr Tydfil Leisure Centre, Merthyr Tydfil, CF48 1UT
- 18.5 Or they can be downloaded from the Council's website at:  
[www.merthyr.gov.uk](http://www.merthyr.gov.uk) or from the Cwm Taf Hub [www.cwmtafhub.co.uk](http://www.cwmtafhub.co.uk)
- 18.6 You can either email completed comment forms to:  
[devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or post them to:
- The Head of Planning & Countryside  
Planning & Countryside Department  
Merthyr Tydfil County Borough Council  
Unit 5, Triangle Business Park  
Pentrebach  
Merthyr Tydfil  
CF48 4TQ
- 18.7 If you have any queries about how to submit your comments please:

Email the LDP team @ [devplanning@merthyr.gov.uk](mailto:devplanning@merthyr.gov.uk) or  
Telephone 01685 726279