

**Cynllun Datblygu Lleol Newydd Cyngor Bwrdeistref Sirol Merthyr
Tudful (2016-2031)
Merthyr Tydfil County Borough Council Replacement Local
Development Plan (2016-2031)**

**COFRESTR SYLWADAU SAFLEOEDD YMGEISYDD
CANDIDATE SITES REPRESENTATIONS REGISTER**

Mehefin2018 | June 2018



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Introduction

This register contains the representations relating to Candidate Sites received during the Replacement Local Development Plan Preferred Strategy public consultation (from 14th July 2017 to 6th October 2017) and the Candidate Sites public consultation (from 13th October 2017 to 24th November 2017).

The register is organised in three sections: 1. General representations in relation to Candidate Sites; 2. Representations which refer to multiple sites; and 3. Representations which refer to specific sites.

Section 1 and Section 2 are organised by Representor Reference Number (which can be referenced against the list of Representors who responded overleaf).

Section 3 is organised by Candidate Site Reference Number which can be referenced against the list of Candidate Site number provided overleaf, or against the Candidate Sites Register October 2017, which is available on the Council's website: www.merthyr.gov.uk/ReplacementLDP

Please note that some representations make reference to ancillary documents or appendices. These can be viewed upon request.

If you require information please contact the Planning Policy Team at:

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LIST OF REPRESENTORS	
101	WELSH GOVERNMENT
103	NATURAL RESOURCES WALES
105	BOYER - PLANNING CONSULTANTS
107	THEATRES TRUST
108	GLAMORGAN - GWENT ARCHAEOLOGICAL TRUST
115	WHITE YOUNG GREEN
116	HOME BUILDERS FEDERATION
119	DWR CYMRU WELSH WATER
122	MINERAL PRODUCTS ASSOCIATION WALES
123	SOUTH WALES POLICE
124	COAL AUTHORITY
129	CAERPHILLY COUNTY BOROUGH COUNCIL – PLANNING DIVISION
132	MERTHYR INITIATIVE GROUP
134	ALAN REES
136	ALAN JAMES
142	CHARLOTTE CONNOLLY
154	RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL- PLANNING POLICY
157	COUNCILLOR PAUL BROWN
158	MERTHYR ANTI-OPENCAST CAMPAIGN
159	RHYDYCAR WEST REGENERATION PARTNERSHIP
161	LEWIS LEWIS
166	RURAL ACTION CWM TAF
184	GEORGE DESIGN CONSULTANTS
206	CPR CONSULTANCY
207	MERTHYR TYDFIL HERITAGE TRUST
244	PUBLIC HEALTH WALES
248	TRAGO MILLS
250	CAERPHILLY COUNTY BOROUGH COUNCIL - LLANCIACH FAWR MANOR
255	ANTHONY COUSINS
257	STUART POUND
258	ELAN HOMES
261	EFS SYSTEMS (UK) LTD
262	HAMMERSON LTD
268	CWM TAF UNIVERSITY HEALTH BOARD - HEALTH AND WELL-BEING
271	CWM TAF UNIVERSITY HEALTH BOARD - ADMINISTRATION MANAGER
279	RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL - COUNTRYSIDE TEAM
280	CYFARTHFA BRANCH LABOUR PARTY
281	DAVID DAVIES
282	RHIANNON THOMAS

LIST OF CANDIDATE SITES		
1	Gilfach Maen Isaf Farm & Tir William Morgan Farm	Bedlinog
2	Land to rear of Bedw Road Bedlinog	Bedlinog
3	Land adjoining 30 Pleasant View Bedlinog	Bedlinog
4	Land adjacent to Craig-y-Hendre	Bedlinog
5	Land off Gelligaer Road, Llancaiach, CF46 6ER	Bedlinog
6	Land to the East of Trelewis	Bedlinog
7	Land at Taff Merthyr Garden Village (Storm Down)	Bedlinog
8	Land between Swansea Road and A465	Cyfarthfa
9	Land North of A465	Cyfarthfa
10	Land to the West of Winchfawr Road	Cyfarthfa
11	Land South of Moodies Field, Heolgerrig Site 1	Cyfarthfa
12	Land South of Moodies Field, Heolgerrig Site 2	Cyfarthfa
13	Trago Mills (Site 1)	Cyfarthfa
14	Trago Mills (Site 2)	Cyfarthfa
15	Land at Erw Las, Gellideg	Cyfarthfa
16	Rhydycar/Orbit	Cyfarthfa
17	Brondeg	Cyfarthfa
18	Upper Georgetown Plateau	Cyfarthfa
19	Land at Rhydycar West - Site 1	Cyfarthfa/Plymouth
20	Land at Rhydycar West - Site 2	Cyfarthfa
21	Land at Rhydycar West - Site 3	Cyfarthfa
22	Land at Rhydycar West - Site 4	Cyfarthfa
23	Land at Rhydycar West - Site 5	Cyfarthfa
24	Land at Rhydycar West - Site 6	Cyfarthfa
25	Land at Rhydycar West - Site 7	Cyfarthfa/Plymouth
26	Land at Rhydycar West - Site 8	Cyfarthfa/Plymouth
27	Land South of College Car Park	Cyfarthfa
28	West Merthyr	Cyfarthfa/Plymouth
29	Rhydycar	Cyfarthfa
30	South Merthyr Tydfil Regeneration Area	Cyfarthfa/Plymouth/Town
31	Land adjacent to Trevor Close, Pant	Dowlais
32	East Street, Dowlais	Dowlais
33	Goatmill Road (Industrial)	Dowlais
34	Former Dowlais MUE Sub Depot	Dowlais
35	Trevor Close, Pant	Dowlais
36	Land east of A4060 at Ffos Y Fran	Dowlais
37	Pengarnddu	Dowlais
38	Land at Pant Industrial Estate	Dowlais
39	Land at East Street, Dowlais	Dowlais
40	Heartlands	Dowlais
41	Blaen y Garth Farm	Dowlais
42	Gurnos Farm	Gurnos
43	Pen-y-dre	Gurnos
44	Colliery Site, Merthyr Vale, Aberfan	Merthyr Vale
45	Land at Hafod, Tanglwys	Merthyr Vale
46	Riverside	Merthyr Vale

47	Taff and Crescent Streets and Railway Sidings	Merthyr Vale
48	Land opposite Kingsley Terrace, Aberfan	Merthyr Vale
49	Cyfarthfa Heritage Area Site 1	Park
50	Cyfarthfa Heritage Area Site 2	Park
51	Cyfarthfa Heritage Area Site 3	Park
52	Former Merthyr Care Home, Penydarren Road	Park
53	YMCA, Penydarren Road, Pontmorlais	Park
54	Pontycafnau	Park
55	Land at Chapel Banks/adj. Joseph Parry's Cottage	Park
56	Ty Keir Hardie/ Martin Evans House	Park/Town
57	Cyfarthfa Park and Heritage Area	Park
58	The Greenie	Penydarren
59	Hillcrest Park/Haydn Terrace	Penydarren
60	Land at Rhydycar West - Site 9	Plymouth
61	Land at Rhydycar West - Site 10	Plymouth
62	Land at Rhydycar West - Site 11	Plymouth
63	Land off Aberfan Road, Site 1 - Option 1	Plymouth
64	Land off Aberfan Road, Site 1 - Option 2	Plymouth
65	Land off Aberfan Road, Site 2 - Option 1	Plymouth
66	Land off Aberfan Road, Site 2 - Option 2	Plymouth
67	Ardagh Site, Dragon Parc, Abercanaid	Plymouth
68	Land West of Gethin Road, Abercanaid	Plymouth
69	Land known as The Lowes, Abercanaid	Plymouth
70	Hoover Site 1	Plymouth
71	Hoover Site 2	Plymouth
72	Hoover Site 3	Plymouth
73	Hoover Factory Sports Grounds	Plymouth
74	Hoover factory facade, gatehouse & sports ground	Plymouth
75	Hoover Factory Site, Pentrebach	Plymouth
76	Land south of Merthyr Tydfil Industrial Park/Sekis	Plymouth
77	West Bank - Land across river from Afon Taf	Plymouth
78	Ski Slope	Plymouth
79	Goatmill Road (Residential)	Town
80	Land at Queens Road (Former School)	Town
81	Theatre Royal and Thespian House, Park Place	Town
82	Former School Site, Queens Road	Town
83	Former Night Club, Church Street	Town
84	Queens Road, Former Ysgol Santes Tydfil Site	Town
85	Central Bus Station and Land Adjacent	Town
86	Bradley Gardens Two	Town
87	Glasier Road	Town
88	Penheolferthyr, Twynyrodyn	Town
89	Former Miners Hall	Town
90	Former St Tydfils Hospital	Town
91	Former Hollies/Police Station site	Town
92	Tax Office	Town
93	Oldway House	Town

94	Land at Treharris	Treharris
95	Commercial Field, Treharris	Treharris
96	Twynygarreg	Treharris
97	Cilhaul	Treharris
98	Taf Fechan River Bank	Vaynor
99	Land west of Coedmeyrick Close	Cyfarthfa
100	Land adjacent to 24 Gelligaer Road	Bedlinog
101	Land at Ty Beili Glas	Cyfarthfa
102	Six Bells, Heolgerrig	Cyfarthfa
103	Land at Oakfield Street, Aberfan	Merthyr Vale

1. General Representations in relation to Candidate Sites

103 – General (Protected Species) - Recommendation

We have carried out an initial site analysis of environmental constraints relevant to Natural Resources Wales remit in the planning system. We have provided you with a spreadsheet containing the candidate sites and potential constraints. Where we have detailed and specific advice on sites, this is set out in the attached Annex 1: NRW's Individual Site Specific Comments. Below is general policy advice regarding some of the environmental constraints.

Candidate sites may contain European Protected Species (EPS) or contain habitats with potential to support populations of (EPS).

EPS are given the highest legal protection through British and European legislation and include species such as the dormouse, otter, great crested newt and all our bat species. They are protected under Regulation 41 of the Conservation of Species and Habitats Regulations 2010 (as amended) (The Habitat Regs), which translates the European 'Habitats' Directive (92/43/EEC) into UK law. Where an EPS is present, and a development proposal is likely to contravene the protection afforded to it, a development may only proceed under a licence currently issued by Natural Resources Wales (NRW) under Section 53 of the above Regulations. This licence can only be issued for the purposes of:

'preserving public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature, and beneficial consequences of primary importance for the environment.'

Furthermore, the licence can only be issued by NRW on condition that there is 'no satisfactory alternative', and that 'the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range'. Additionally, Regulation 9 of the Habitat Regulations requires public bodies in exercise of their functions, to have regard to and, in respect of enactments relating to nature conservation, to secure compliance with the requirements of the 1992 'Habitats' Directive.

Therefore, we strongly recommend that candidate sites with EPS or EPS potential are subject to appropriate assessments and if after due consideration allocated, detailed survey and master planning proposals to ensure compliance with the regulations.

103 – General (Biodiversity) – Advice

We have carried out an initial site analysis of environmental constraints relevant to Natural Resources Wales remit in the planning system. We have provided you with a spreadsheet containing the candidate sites and potential constraints. Where we have detailed and specific advice on sites, this is set out in the attached Annex 1: NRW's Individual Site Specific Comments. Below is general policy advice regarding some of the environmental constraints.

PPW (5.4.3) also recognises the importance of non-statutory sites which provide links from one habitat to another. This makes an important contribution to the conservation and enhancement of biodiversity and quality of local environment, including enabling adaption to climate change.

Ancient Woodland

PPW 5.2.9 states Ancient and semi-natural woodlands are irreplaceable habitats of high biodiversity value which should be protected from development that would result in significant damage. We have indicated those candidate sites that maybe potentially damaging to woodland listed on the ancient woodland inventory in the attached spreadsheet Annex 3.

These candidate sites, if allocated, should be carefully designed and configured appropriately, incorporating adequate buffer areas to prevent impacts on the woodland while helping to preserve connectivity as far as possible.

Semi Natural Habitat

We have also identified 15 sites that may impact on areas of semi-natural habitat of ecological importance to the local area. This should not be considered exhaustive; other appropriate advisors such as the Local Authority ecologist will have further knowledge and information on areas with ecological value.

These sites are indicated within the attached spreadsheet Annex 3. These sites should take account of the semi-natural habitats present and seek to minimise impacts while retaining as much of the habitats as possible through careful design and implementation. More detailed advice can be provided if these sites are to be allocated and more information is put forward.

103 – General (Development & Flood Risk) – Information

We have carried out an initial site analysis of environmental constraints relevant to Natural Resources Wales remit in the planning system. We have provided you with a spreadsheet containing the candidate sites and potential constraints. Where we have detailed and specific advice on sites, this is set out in the attached Annex 1: NRW's Individual Site Specific Comments. Below is general policy advice regarding some of the environmental constraints.

Planning Policy Wales (13.2.3) describes Welsh Government's sustainable development objectives which require a move away from flood defences and mitigation of flooding consequences towards a more positive avoidance of development in areas at risk of flooding. It states planning authorities should adopt a precautionary approach when formulating development plan policies.

This is supported by Technical Advice Note 15: Development and Flood Risk (TAN15) which provides a precautionary framework to guide decision making. This framework includes the planning tests contained within section 6 of TAN15.

Section 6 states that highly vulnerable development in Zone C2 should not be permitted. This is echoed in paragraph 10.8 of the TAN which states that sites in Zone

C2 should not be allocated for highly vulnerable development. We refer you to Welsh Government's Chief Planning Officer letter - Planning Policy on Flood Risk and Insurance Industry Changes (9th January 2014) which affirms this policy direction.

Allocations for less vulnerable development in C2 and allocations in C1 should only be made if it can be justified that the development or use is in accordance with the tests in section 6, including whether the consequences of flooding are acceptable in accordance with Appendix 1 of TAN15. It is for the planning authority to fully explain and justify the reasons for allocating a site within Zone C. A proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed.

The sites that fall within flood zones are indicated in the attached spreadsheet Annex 3.

Further detailed and site specific advice on flood risk for individual sites is provided in Annex 1. This includes the candidate sites proposed for highly vulnerable development – residential – which fall within or partially within Zone C2.

103 – General (Foul Water Disposal) – Information, Recommendation

We have carried out an initial site analysis of environmental constraints relevant to Natural Resources Wales remit in the planning system. We have provided you with a spreadsheet containing the candidate sites and potential constraints. Where we have detailed and specific advice on sites, this is set out in the attached Annex 1: NRW's Individual Site Specific Comments. Below is general policy advice regarding some of the environmental constraints.

The attached spreadsheet Annex 3 broadly identifies whether each candidate site is in, or close to a public mains sewer, i.e. Dwr Cymru Welsh Water catchment area. It is essential that there is evidence to demonstrate that suitable infrastructure exists for both water and wastewater in the Plan period. This will help to ensure the delivery of a sustainable strategy and development options for sites/proposals.

The first option for developments discharging 'domestic' sewage is to connect into the public mains sewer where it is reasonable and practicable to do so. The installation of private sewage treatment facilities within publicly sewered areas is not normally considered environmentally acceptable because of the greater risk of failures leading to pollution of the water environment compared to public sewerage systems. This hierarchical approach is supported by government guidance on non-mains drainage in Welsh Office Circular 10/99 (paragraphs 3 and 4), which stresses that the first presumption must be to provide a system of foul drainage discharging into a public sewer.

Where it is not possible to connect into a public sewer, and private sewage treatment/disposal facilities to the environment are proposed, they must be installed and maintained in accordance with British Standard 6297 and Approved Document H of the Building Regulations 2000. They will also require our consent.

We will not normally consent a private sewage treatment system where it is reasonable to connect to the public mains sewer. Likewise, discharges of trade effluent will be expected to connect into the public mains sewer where it is reasonable to do so and agreement can be reached with the sewerage undertaker to issue a trade to sewer consent.

We recommend that DCWW should be consulted to establish whether there is sewerage capacity in that area. Planned upgrades to sewerage infrastructure also need to be taken into consideration and developers should consult with DCWW regarding their Asset Management Plan (AMP) programme. If improvements are needed that are not planned, or if improvements are needed in advance of when they are planned, we recommend that you discuss this with DCWW, as this Plan provides an opportunity to address this at a strategic level by way of developer contributions.

103 – General (Land Contamination and Sensitive Groundwaters) – Recommendation, Information

We have carried out an initial site analysis of environmental constraints relevant to Natural Resources Wales remit in the planning system. We have provided you with a spreadsheet containing the candidate sites and potential constraints. Where we have detailed and specific advice on sites, this is set out in the attached Annex 1: NRW's Individual Site Specific Comments. Below is general policy advice regarding some of the environmental constraints.

Planning Policy Wales takes a precautionary approach to land affected by contamination. Before the principle of development can be determined, land contamination should be investigated to see whether it could preclude certain development due to environmental risk or cost of clean-up (remediation).

Where contamination is known or strongly suspected, a desk study, investigation, remediation and other works may be required to enable safe development, for example on historic landfill sites. Minimum requirements for submission with a planning application are a desk study and preliminary risk assessment, such as a site walkover or conceptual model. Site Investigation and Remediation Strategy reports may also be required for submission with a planning application for sensitive land use types or where significant contamination or uncertainty is found. The Local Authority Environmental Health team (Contaminated Land Officer) will hold detailed records on known/potential land contamination. We recommend any potentially contaminated sites provide further information in the form of a desk study as minimum.

Given the lack of detailed information relating to past uses, proposed uses and potential risk, it is not possible for us to provide detailed comments for proposed candidate sites.

We are likely to have concerns where development is proposed in an area known or is likely to be affected by land contamination, particularly where there are sensitive controlled waters close by, for example close to a surface water body or over a

Principal aquifer. We have identified some sites in the attached spreadsheet Annex 3 that may fall into this category.

103 – General (Statutory Nature Conservation Designations

Sites of Special Scientific Interest (SSSI)) – Information

We have carried out an initial site analysis of environmental constraints relevant to Natural Resources Wales remit in the planning system. We have provided you with a spreadsheet containing the candidate sites and potential constraints. Where we have detailed and specific advice on sites, this is set out in the attached Annex 1: NRW's Individual Site Specific Comments. Below is general policy advice regarding some of the environmental constraints.

SSSIs are of national importance and there is a duty on all public bodies to take reasonable steps to further the conservation and enhancement of the SSSIs special interest. PPW (5.5.8) states that SSSIs can be damaged by developments within or adjacent to their boundaries, and in some cases, by development some distance away. There is a presumption against development likely to damage a SSSI.

We have initially identified 17 sites within or adjacent to a SSSI boundary which may have the potential to damage a SSSI. There are also some sites that may have potential to damage areas of species rich grassland of national significance, which should be considered a candidate SSSI.

These are indicated on the attached spreadsheet Annex 3. Further detailed site specific advice on potential impacts to SSSIs is provided in Annex 1.

108 – General (Archaeological Impact RAG) – Information, Advice

Our comments relating to the candidate sites for the LDP are enclosed. The Archaeological Impact RAG is based on the type and nature of archaeological remains and historic assets within each candidate site, and the likely impact of any proposed development on the assets within the area, and particularly those of a large scale which are likely to have an impact on the wider character areas within as part of the Registered Landscapes of Merthyr Tydfil and Gelligaer Common.

The Red equates to those where ASIDOHL, Cadw consultation and pre-determination archaeological work such as an initial desk-based assessment would be necessary; and where Scheduled Ancient Monuments are within the candidate site area. The results of these may lead to objection to a development, or to further archaeological work.

The Amber equates to those sites where archaeological work will be required, which may be pre-determination or which can be conditioned, but which will require undertaking to mitigate the impact of any development.

The Green equates to where there is unlikely to be any adverse impact on historic assets or the historic environment that would require mitigation.

Responses were made following a study of the Historic Environment Record data, and Historic OS mapping sequences. It should be noted that these are initial responses only, and that details of particular individual developments may lead to more detailed and differing responses in order to protect the archaeological resource, historic assets and historic environment in line with current legislation, policy and guidance.

119 – General (Water mains & public sewers) – Information, Recommendation, Advice

Notes: Owing to the number of sites, the below comments constitute a high level desk based assessment and are subject to update when the sites are refined.

1. The whole of the LPA area is served by our Cilfynydd wastewater treatment works (WwTW). There are no issues with this WwTW accommodating foul-flows at present, though there may come a time where improvements will be required in order to accommodate the full level of growth proposed.
2. Based on an anticipated adoption date of late 2019, the remainder of the LDP plan period up to 2031 will be over two of Welsh Water's Capital Investment Programmes (AMP7 – 2020-2025 and AMP8 – 2025-2030). Should reinforcement works be required at the Works, an investment scheme will be considered for inclusion within these future AMP programmes.
3. Notwithstanding the below comments, off-site water mains / public sewers may be required in order to provide a connection to the existing networks.
4. With regard to water supply, there are generally no issues as the majority of the LPA is generally fed off the large diameter trunk mains that are served by the reservoirs in the Brecon Beacons. However we can provide a more thorough assessment when the sites are refined.
5. If assets need to be laid over private land, developers can serve a requisition notice on Welsh Water to undertaken the works, the cost of which can be offset by the income generated from the development over a period of 12 years, with a contribution required if the income falls short of the cost.
6. With regard to the public sewerage network, there are generally no issues although there are certain points on the network where there are incidents of flooding that may need to be resolved or alternative connection points will be required.
7. Hydraulic modelling assessments (HMA) may be required for the larger sites or in order to determine connection points on the water supply

and/or public sewerage networks in order to understand potential connection points and/or any improvements required.

8. For employment proposals, we are only obliged to take domestic foul flows and should the end user require a trade discharge to the public sewer then Welsh Water's consent is required. Further assessments will be required as and when potential demands are known. If a discharge of trade effluent is required, then a Discharge Consent will be required under Section 118 of the Water Industry Act 1991.
9. Where there are assets crossing the site, protection measures will be required in the form of an easement width or diversion in order to maintain the integrity of the asset and allow for access if required. This will be at the developer's cost.

See Table in Appendix 1

124 – General (Minerals & Mining) – Requirement, Recommendation

The Coal Authority would expect all proposed site allocations to be considered against the data we provide to the LPA in respect of surface coal resource and development risk plans. It would therefore be prudent to include a criterion which assessed coal mining data. This would be a due diligence check to ensure that potential development sites do not contain any mine entries or other coal related hazards which would require remediation or stabilisation prior to development.

124 – SA (Minerals – Comment

Comments on the Replacement Merthyr Tydfil Local Development Plan 2016-2031: Candidate Sites Register Consultation

The comments which The Coal Authority would like to make in relation to the above document are as follows:

The Coal Authority is pleased to see that the Candidate Site Sustainability Appraisal includes consideration of whether or not the site is in an area of mineral resource worthy of safeguarding, by using BGS data safeguarding maps to inform these decisions.

We are however disappointed that consideration does not appear to have been given, when reviewing the candidate sites, to the issue of land stability. The Coal Authority previously noted that we would expect all proposed site allocations to be considered against the data we provide to the LPA in respect of surface coal resource and development risk plans. Prior to any sites being moved forward to allocation we would request that a criterion is included which assesses the available coal mining data. This would be a due diligence check to ensure that potential development sites do not contain any mine entries or other coal related hazards which would require remediation or stabilisation prior to development and would enable such issues to be identified an early stage.

154 – Welsh medium school education provision – Requirement

Development of all and any of the Candidate Sites would need to contribute to the provision of Welsh medium secondary education and directly help fund the expansion of Ysgol Gyfun Rhydywaun, in line with the response to question 3 above.

166 – SSSIs – Objection

Any loss of SSSIs is unacceptable.

184 – New Candidate Site (Heolgerrig) – Submission

The site looks to accommodate 40 new dwellings, depending on ground conditions & MTCBC LPA attitude to density.

207 – West Merthyr, Town Centre heritage sites & open space

The Heritage Trust has reviewed and discussed the 98 candidate sites and has comments to make on a number of these.

The Heritage Trust has comments and also objections for a number of candidate sites. In some other cases the Heritage Trust gives its support.

The main points are that the Heritage Trust objects to all 12 of the proposals for West Merthyr / Rhydyar West. This area is outside the settlement boundary and should be reserved for future use as a heritage country park – the proposal first put forward by the local authorities in the 1970s.

These were detailed in the replies given on the official consultation form with site reference numbers and in order.

Broadly, the Heritage Trust objects to:

- all the West Merthyr / Rhydyar West site proposals (a heritage country park is the project that should be adopted/supported).
- any development on the Hoover Sports Ground – which must be retained
- any redevelopment at Hoover that does NOT lead to the retention of the original factory entrance and façade (main block), gatehouse and office/canteen building
- any more housing development at or next to the key heritage sites at Chapel Row
- any development on 'St Tydfil's Park' – the old cholera cemetery site.

There is qualified support for projects including the YMCA, General Hospital, Theatre Royal and Miners Hall if these structures are conserved and restored (albeit in some case façade only).

Some sites seem to be just pockets of land in the community (or not even in the community) and setting up these boundaries could leave other natural green open space nearby open to development.

Many sites in the candidate sites register are add-ons or infill in difficult terrain or potentially conflict with existing amenities.

257 – New Candidate Site (Swansea Road) – Submission

I would like to propose a new candidate site for allocation for residential housing in the new LDP.

I apologise for the late submission, but I wasn't made aware of the new LDP until recently when I discovered it by chance.

- Plan attached.
- Very occasional grazing
- Highways have previously agreed in principle to an access road to the site from Swansea Road.
- None at this stage.
- The site is between the Bellway site and other established housing. There is a bus route alongside the site. There are services alongside the site. I understand that it is within the current Settlement Limit boundary.

281 – New Candidate Site (Aberfan) – Submission, Recommendation

We the co-owners of the former allotment gardens at the rear of Oakfield Street Aberfan (which remain in an overgrown vegetative state and substantively unused) wish to propose this site, which was previously granted outline planning consent for residential development on 24 September 2009, for inclusion within any settlement boundary within the LDP and to continue as suitable for residential development.

From the previous planning history, Council will be aware of the infrastructure and mitigation measures envisaged.

The land has been, and is still being, marketed for sale by Cooke & Arkwright. The main reason for lack of success to date has been the economic downturn which occurred very soon after planning consent was obtained. That has largely remained the case to date, though this may change going forward and there may be economies of scale available for a developer taking on this site together with some of the others locally under consideration.

2. Representations in relation to multiple Candidate Sites

103 - Sites 35,42,55,76&90 – Recommendation

The SA assessment of Strategic Options for the mid growth option concluded:

Development at this level is likely to have some impact on open space provision across the County Borough. However, given that the level of development proposed is lower than what has been proposed in the past, and the fact the Council now has an adopted Open Space Strategy, built development should be able to be planned in conjunction with improvements to the quality and access to important areas of open space. Also, the scope for improvement to the open space network will be higher than if lower levels of development were proposed, due to funding becoming easier to access, particularly in respect of CIL and Section 106 agreements.

The Open Spaces Strategy indicates that one candidate site (Site 35) is located directly adjacent to a 'Priority open space', and five other sites (27, 42, 55, 76 & 90) are located on 'Other open spaces'.

Policy SW9 states: 'Designated open space will be protected unless its loss is mitigated or compensated by improvements to the quality of other open space'. Section 4.8 of Merthyr Tydfil's Open Spaces Strategy states: 'No open space should be lost from the Strategy until full consideration has been given to the potential alternative open space uses for the site in order to redress identified shortfalls in that ward'.

We recommend allocated sites (or specific Plan policies) are assessed against both policies.

105 – Sites 1, 6, 7, 96 & 97 – Requirement

The LDP Manual states that it is important to be able to demonstrate that there are no fundamental impediments to the development of the sites allocated in the plan and it is therefore important that in assessing candidate sites the Council are satisfied that they will be delivered in the plan period. PPW also states that local planning authorities must ensure that sufficient land is available or will come available to provide a five year supply of land for housing and one of the criteria for sites to be included in the five year supply is agreement amongst the Study Group that it is financially viable to develop the site. The latest Joint Housing Land Availability Study identifies a 1.6 year supply of housing land and the Council has not achieved a 5 year supply since the LDP was adopted in 2011 and before that not since 2008. It is therefore essential that the Review of the LDP gives adequate consideration to the viability of sites to ensure that a 5 year housing supply will be achieved in future.

The candidate site submitted by AW Properties (land to the east of Trelewis) is in a single ownership, has a suitable access and has no constraints. It is also in an area

where there is a proven market demand as demonstrated by the large number of completions on the adjacent LDP allocated H48 site. In considering the submitted candidate sites consideration should be given to whether the sites are developable and will contribute to the 5 year housing land supply. For example:-

Two candidate sites have been submitted adjacent to Taff Merthyr Garden Village (Nos.1&7) which already has an allocation in the LDP (H49) which has not come forward to date and is categorised in Category 4 in the 2016 JHLAS.

In Treharris two of the candidate sites (96 and 97) are allocated in the LDP (sites H44 and H45) and have not come forward to date and are categorised in Category 4 in the 2016 JHLAS.

If these sites were to be allocated in the LDP Review then it is unlikely that they would make a contribution to the 5 year housing land supply.

The Council is also proposing to delete the Green Wedges from the LDP and designate 5 Special Landscape Areas (SLAs). Whilst many of the submitted candidate sites are included within the proposed SLAs the land to the east of Trelewis is not and will no longer be within a Green Wedge.

In this situation it is considered that the land to the East of Trelewis should be allocated for housing in the Review of the LDP as it is in a sustainable location and will provide a valuable contribution to the 5 year housing land supply.

115 – Sites 20-23, 28, 61 & 62 - Objection

Sustainability Appraisal

The Candidate sites register contains the assessment of the various sites put forward as part of the call for candidate sites and, in respect of the sites submitted in December 2016, largely (though not wholly) repeats the assessment set out at Table 8.1 of the Initial Sustainability Appraisal Report.

- It is our client's view that the SA has not been consistently applied to the Candidate Sites and does not, in all cases, take account of the position on the ground.
- We observe a clear contradiction in approach where our client's sites have been rated poorly compared to other sites with very similar characteristics (e.g. see in particular Appendix D).
- The table at page 9 of the CSR is not a fair representation, noting sites with 'uncertain' or 'minor negative' ratings as according with the LDP Strategy whilst unfairly dismissing others in particular all eleven Candidate Sites put forward by our client (site numbers 19-26 and 60-62) and site no.28 (put forward by the Regeneration Department of MTCBC). This approach is prejudicial, inconsistent and open to challenge.
- As set out in our representations dated 5th October 2017, certain appraisal criteria are considered not to be well conceived. Accordingly, we have re-evaluated the above sites at Appendix A and B to this letter.

- We consider the sustainability Appraisal Objectives in more detail, below and highlight where we believe our client's sites have been unfairly or incorrectly assessed. If one applies a simple numeric scoring system to the sites (+1 for a Major Positive, -1 for a Major Negative etc), each of our client's Candidate sites moves from a negative score to a positive score as a result of our analysis. In many cases, the positive score exceeds that of other sites which the LPA consider to be compliant with the Preferred Strategy. The Comparative Sustainability Appraisal scoring sheet at Appendix B provides further detail in this regard. Accordingly, we consider the table at page 9 of the CSR is not a fair representation of which sites accord with the LDP Strategy and which do not.

Sustainability Appraisal Objectives

As noted in our letter of 5th October 2017:

1. The Hoover Strategic Regeneration Area (HSRA) is earmarked for the provision of 800 homes, shops, parkland, greenspace and public open space, community facilities, at least one new school, new metro station and park and ride facility as well as employment land for new businesses. Given the constraints of the site, these requirements are likely to exceed the quantum of developable land within the HSRA and accordingly additional housing and employment land will need to be found elsewhere as a consequence. Continuing to rely on the site as a key growth area in the Preferred Strategy could render that strategy, and the Plan as a whole, unsound (soundness tests 2 and 3).
2. Our client's residential candidate sites (specifically LDP site numbers 20, 21, 22 or 23 and 62, within Cyfarthfa ward, where the demand for housing is highest) can provide a useful contribution towards meeting the number required homes and meeting the gap left by the potential shortfall at the Hoover Strategic Regeneration Area (failure to consider these as real alternatives fails soundness test 2).
3. No reference is made in the Preferred Strategy to the role the tourism and leisure industries can play in providing sustainable growth, including economic growth, in the County Borough. Hotels and more adventurous forms of leisure are not considered at all, despite the success of Bike Park Wales and Rock UK and the recognition given to these types of leisure pursuit and the need for additional hotel accommodation given in the Destination Management Plan (2015-2018). This is a serious omission which should be addressed in the emerging LDP (failing soundness test 2).
4. Furthermore, the role that leisure development and opening up public access to currently closed areas can play in improving health and wellbeing, in line with the Wellbeing of Future Generations Act (particularly the goal of achieving "a healthier Wales") has not been recognised (failing soundness test 1).

5. It is a requirement that the LDP reflects other plans and strategies, including the Merthyr Tydfil Destination Management Plan (2015 - 2018). One of the aims of this plan is to contribute toward an increase in quality attractions and accommodation providers in the region whilst building upon increasing overnight stays across the County Borough and adding to high number day visitors. However, these matters have been completely overlooked in the Preferred Strategy (failing soundness test 1).
6. the SA has not been consistently applied and does not, in all cases, take account of the position on the ground. Furthermore, certain appraisal criteria are considered not to be well conceived. For example:
 - a) Adopting a rigid 800m walking distance fails to recognise that walking offers the greatest potential to replace short car trips particularly those under 2 km. The Institution of Highways and Transport confirms that 80% of trips under 1.6k are undertaken by foot and 80% of trips under 8k are undertaken by cycle (SA Objective 1);
 - b) Likewise, a rigid 100m distance from Active Travel routes is illogical. It is common sense that people wishing to access an Active Travel route would not be put off from doing so by having to travel >100m to access that route (SA Objective 8);
 - c) No justification has been provided for considering why proposals have been considered to have a negative effect on the character of the community leading to lack of transparency and subjective judgements (SA Objective 2);
 - d) Certain criteria which are applicable to residential sites have been applied blindly to all candidate sites, including those proposing non-residential use (SA Objective 4);
 - e) Despite reference being made to the desirability of sites to better connect Merthyr Tydfil and Aberdare via the Abergare Tunnel, no mention is made of this in the individual scoring criteria nor, apparently, in how sites have been scored/assessed (SA Objective 8);
 - f) Scoring criteria necessitates a number of unwarranted assumptions being made, particularly regarding ecological value in the absence of surveys (SA Objective 12) and the potential reduction of flood risk (Objective 14) and heritage impact (SA Objective 16) in the absence of any detailed schemes.

SA Objective 1 (To ensure that the community and social infrastructure needs of all residents and communities are met)

This relates to the distance of the site from existing services and facilities. According to the SA Framework, "Reasonable walking distance" for this purpose is informed by Manual for Streets (Department for Transport, 2007). We note that paragraph 4.4.1 of Manual for Streets states that:

"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS134 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km. MfS encourages a reduction in the need to travel by

car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents."

Notwithstanding the underlining above, the SA adopts a ridged 800m as comprising reasonable walking distance which we consider is unsound. This unsound threshold will affect the scoring of many Candidate Sites.

The Institution of Highways and Transport (IHT) guidance document 'Planning for Walking' (April, 2015) states that 80% of journeys shorter than 1.6km are made wholly on foot with 20% for journeys that are 1.6km to 3.2km long also being undertaken on foot.

The Welsh Government Walking and Cycling in Wales - Active Travel in Wales 2014-15 (WCW 2015) recorded that 38% of pedestrians primarily use walking to access local shops, 10% to travel to work, 9% for a leisure activity, 8% for town centre shopping and 7% going to school / walking a child to school. The data shows that pedestrians use walking for a variety of day to day needs and purposes.

The WCW 2015 also recorded the following statistics:

- 38% of all trips to local shops are undertaken by walking;
- 30% of all trips to GPs are undertaken by walking;
- 14% of all trips to work are undertaken by walking;
- 32% of all trips to educational facilities are undertaken by walking;
- 70% of trips within 800m of a primary school are undertaken on foot, with 47% of walking trips within 800m to 1.6km and 22% within 1.6km to 3.2km; and,
- 89% of trips within 800m of a secondary school are undertaken on foot, with 79% of walking trips within 800m to 1.6km and 27% within 1.6km to 3.2km.

The WCW 2015 has recorded that walking is a practical mode of travel when accessing key day to day services and facilities.

Furthermore, no account is taken in SA Objective 1 of cycling. The Institution of Highways and Transport (IHT) guidance document 'Planning for Cycling' (April, 2014) states the majority of cycling trips are for short distances, with 80% being less than 8kms and with 40% being less than 3.2km.

Furthermore, we note that the appraisal of site 23 against this objective has changed since the publication of the Initial Sustainability Appraisal report. It was initially rated as minor positive (being within reasonable walking distance of most key services) but is now rated as major negative (apparently due to the majority of the site being beyond reasonable walking distance), despite there being no change on the ground to justify this.

Accordingly, Appendix C provides a "Sustainable Travel Appraisal Report" (WYG, September 2017) which considers what key services and facilities are located within genuinely reasonable walking and cycling distances, taking account of barriers to such movement (i.e. not straight line distances). The SA scoring of our client's residential sites 20, 21, 23 and 62 has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A).

Furthermore, the same considerations appear to have been applied to all potential uses proposed on candidate sites. Sites 28 and 61 propose tourism and leisure uses and accommodation. The proximity of such uses to, say, primary schools or GP surgeries is not a relevant or informative consideration. Accordingly, the enclosed Sustainable Travel Appraisal Report considers the distance of these sites from existing residential areas, and thus the ability of the leisure/tourism facilities to serve the local 'walk-in' population and the ability of the tourist accommodation to provide employment opportunities for the local 'walk-in' population. The SA scoring of sites 28 and 61 has been adjusted on the enclosed Revised Sustainability Appraisal sheets.

SA Objective 2 (To maintain and enhance community and settlement identities)

No justification has been provided for considering why proposals have been considered to have a negative effect on the character of the community. While reference is made in the SA Framework to coalescence and scale of change, no criteria have been set, leading to lack of transparency and subjective judgements (with those judgements often being made on the basis of scant information). Sites 20, 21 and 22 would provide c.112, c.170 or c.340 homes which would comprise a relatively modest addition to Heolgerrig and would not result in any coalescence. The Minor Negative rating, suggesting a significant change in the character of the settlement, is wholly unjustified in this regard.

Furthermore, site 23 is rated as 'Major Negative' suggesting it would lead to coalescence or would subsume the existing community. As a south-eastern extension to the existing settlement of Heolgerrig, which is currently separated from Merthyr Tydfil only by the A470 and would continue to be so, we do not consider that any settlement would be subsumed or coalesced with another.

Site 28, albeit relating to a large area, need not be subject of site wide development. It is open to the LPA to limit development within any given Candidate Site, thus limiting any fears that the leisure/tourism development proposed would lead to coalescence. The economic benefits of such development would help maintain and enhance the settlement, and would certainly not subsume it.

Site 61 comprises a pocket of hotel/tourist accommodation adjacent to the roundabout access off of the A470. Notwithstanding this, the SA scores this proposal as Minor Negative, suggesting a significant change in the character of the community. We do not believe that any change to the character of the community would result from this development beyond providing a source of local employment. The appraisal rating appears to be wholly unjustified.

Sites 61 and 28 have the potential to create a major new leisure destination of national significance, focused around two new hotels, spa and conference facilities, heritage and nature trails, indoor bike and skate park (to complement the activities of neighbouring Bike Park Wales) and the UK's largest indoor water park. We understand from MTCBC that there is also a requirement for hotels and visitor accommodation. Facilities that would enable visitors to stay in Merthyr would have significant economic benefits and also create longterm jobs.

Site 62 proposes just 15 units on the edge of Abercanaid, within the Hoover Strategic Regeneration Area; an area actively promoted for development in the Preferred Strategy. The Minor Negative rating, suggesting a significant change in the character of the settlement from these 15 units, is wholly unjustified in this regard.

The SA scoring of sites 20, 21, 22, 23, 28, 61 and 62 has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A).

SA Objective 4 (To improve human health and wellbeing and reduce inequalities)

The SA Framework notes that development proposals will be assumed to make appropriate and timely provision but then goes on to differentiate sites on the basis of their proximity to appropriate existing provision. This seems illogical as if the assumption is correct (that all sites will make appropriate and timely provision) then all sites will be sufficiently served. Only if it could be demonstrated that a site was incapable of making appropriate and timely provision or would actively reduce the open space provision in an area with a deficiency of such provisions should anything less than a wholly positive score be attributed. Certainly it is true that each of the sites on our client's land is capable of making appropriate provision.

We note that sites 20 and 21 are both assessed to be 'Minor Positive' as those sites are located within reasonable walking distance (taken as being 400m) of open space/leisure facilities. However, site 23, the northern part of which overlaps with sites 20 and 21, is rated as Minor Negative, being over 400m.

This assessment is difficult to reconcile as clearly large parts of site 23 should be rated identically to sites 20 and 21. The southern part of this site (or, indeed, any part of the site) could provide on-site open space sufficient not only to serve residents of the site but also to resolve the deficiencies in existing provision within Heolgerrig, as identified in the Open Space Assessment and associated Action Plan, and thus should be rated as Major Positive.

Furthermore, the same considerations appear to have been applied to all potential uses proposed on candidate sites. Sites 28 and 61 propose leisure uses, either in their own right (site 28) or as part of hotel destination complex (site 61 - e.g. spa/well-being centre/gym, water park, biking and state etc). Unlike residential uses, the proximity of leisure facilities to other leisure facilities/open space has no effect on wellbeing or inequality. Notwithstanding this, both sites have been rated as Minor Negative by virtue of being located more than 400m from existing provision. In fact, the provision of additional facilities will boost health and well-being. This is a clear deficiency in the SA framework and the appraisal of sites 28 and 61 in particular.

The SA scoring has been adjusted on the enclosed Revised Sustainability Appraisal sheets to account for the above (Appendix A).

SA Objective 8 (To reduce the need to travel and encourage sustainable modes of transport)

Similar comments are made in respect of this SA Objective as to SA Objective 1. The imposition within the assessment criteria of a rigid 800m distance from a train station fails to acknowledge Institution of Highways and Transport (IHT) guidance documents 'Planning for Walking' and 'Planning for Cycling (April, 2015)' and the fact that 80% of journeys shorter than 1.6km are made wholly on foot and cycling extending that distance. Likewise, a rigid 100m distance from Active Travel routes is illogical given this IHT guidance and, indeed, common sense (people wishing to access an Active Travel route would not be put off from doing so by having to travel >100m to access that route). It is entirely feasible for our client's sites to be readily accessible to Merthyr and/or Pentrebach rail stations within these reasonable

distances. Note also that the site under Marvel's ownership has the benefit of two footbridges over the A470 and one underpass under the A470 accessible by cycle and foot providing quick and easy access to the Town Centre and Abercanaid.

Furthermore, a number of the sites are within 400m of bus stops within Heolgerrig and/or Abercanaid. However, given the range and number of day-to-day facilities within IHT reasonable walking distances of the sites, the existence of bus stops is not a determinative matter. In any event, the SA Framework notes that "The SA assumes that larger strategic development options have greater potential for enhancements to existing infrastructure and services/provisions". This appears not to have been taken into account. For example, site 28 has the potential to provide the re-opening of the Abernant Tunnel (which would comprise a 'key cycling route') and to provide additional bus stops as part of and to serve the proposed tourism/leisure development. Notwithstanding this it achieves a major negative rating.

Indeed, despite reference being made in the SA Framework to the ability of sites to better connect Merthyr Tydfil and Aberdare via the Abernant Tunnel, no mention is made of this in the individual scoring criteria nor, apparently, in how sites have been scored/assessed.

The enclosed Sustainable Travel Appraisal Report (Appendix C) considers these matters in more detail and the SA scoring has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A) to account for the findings.

SA Objective 10 (To minimise energy use and optimise opportunities for renewable energy generation)

While the site is not promoted for renewable or low carbon energy, the mining legacy of the Marvel Ltd land provides clear potential to integrate with renewable technologies. For example, recovered minewater generally has a higher geothermal gradient than natural groundwater and therefore provides the potential for using ground water as part of a geothermal heating scheme for the site. This could be utilised for heating or cooling for the hotel and leisure development options (sites 61 and 28).

The SA scoring has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A).

SA Objective 12 (To maintain and enhance biodiversity and ecosystem connectivity)

We consider there are a number of significant inconsistencies in approach, unwarranted assumptions and false certainties which draw the more positive gradings awarded to the South Merthyr Tydfil Regeneration Area options, in comparison to the Land at Rhydycar West options, into question. A fuller critique is attached at Appendix D. In particular, the absence of an equivalent level of information about ecological constraints beyond mere designations pertaining to the South Merthyr Tydfil Regeneration Area (Site 30 and its constituent sites) appears to have been taken as an absence of constraint, with in some cases neutral or only minor negative gradings attributed where, at best, 'uncertain' gradings would be more appropriate and justifiable. An inconsistent approach to the treatment of proximity to SSSI land and to effects on SINCLAND is also revealed by the attached critique. As well as rendering the appraisal processes vulnerable to challenge, this inconsistency is likely to have implications for the veracity of assumptions made about development capacity within the South Merthyr Tydfil Regeneration Area.

On the other hand, while the negative Objective 12 gradings attached to the Rhydycar West options (sites 20, 21, 22, 23, 61 and 28) are in some instances an inevitable and broadly accepted consequence of these affecting land subject to SSSI designation, it is not always the case that SSSI land is affected by these options and therefore the across the board Major Negative rating masks the reality. To some extent this is an inherent weakness in the SA methodology, but here it has led to options that involve more land take from the SSSI being graded equally negatively to options that involve de minimis land take from the SSSI, or even none at all. The case of Site 20 is instructive in this regard.

In combination, the result is an overly negative and in some instances inherently challengeable portrayal of the performance of the Land at Rhydycar West options against Objective 12, which is then compounded as a systemic weakness in the overall SA by this being set against a far less negative and equally challengeable portrayal of the performance of the South Merthyr Tydfil Regeneration Area. The overall consequence is that the SA fails to pay due regard to significant uncertainties about the capacity of the South Merthyr Tydfil Regeneration Area and its constituent sites to deliver the intended quotient of residential and other forms of development in a suitably sustainable manner.

SA Objective 13 (To minimise the demand for water and improve the water environment)

Work has been carried out in this regard, albeit it is recognised that the Council has not been provided with a copy of WYG's assessment report in advance of categorising the proposed sites (see attached note). It is considered likely that the majority of the proposed options will require some form of supporting ground investigation and further assessment before final conclusions can be drawn, however, sufficient is known now to confirm a Minor Positive rating for all but site 28 (albeit comprehensive development of the whole of site 28 is not envisaged and a Minor Positive may be appropriate there too).

Surface water features present on the site largely drain eastwards towards the River Taff which is situated within the Confluence with the Taf Fechan to the Confluence with the R Cynon' catchment area. The River Taff currently has a WFD overall status of 'moderate' and a WFD Cycle 2 (2015-2021) objective of 'Good'.

Further detail is provided at Appendix E.

Based on the existing information known for the sites the SA scoring has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A).

SA Objective 14 (To minimise the risk of flooding)

The SA Framework makes clear that the scoring of sites against this objective depends wholly on (1) whether the site is within an area of flood risk which the NRW flood risk plan will determine and (2) whether the site has the potential to reduce flood risk. In respect of the latter, much will depend on development design and detailed drainage proposals. We consider there are a number of significant inconsistencies in approach and unwarranted assumptions in how this objective has been applied.

We note that sites 61 and 62 were previously rated as neutral (in the initial Sustainability Appraisal document) and are now rated as uncertain. The reasons for this are unclear as the NRW flood risk maps confirm that none of the sites are located within a flood risk zone (in TAN 15 terms) and, while parts of the sites are affected by surface water flooding, development could readily avoid these areas or mitigation could be provided.

The SA scoring has been adjusted to neutral for all sites on the enclosed Revised Sustainability Appraisal sheets (Appendix A) to account for the above.

SA Objective 15 (To protect and conserve soil and safeguard mineral resources)

Each of the sites have been rated as major negative as the sites are greenfield and there is considered to be no clear mitigation for the impact on soil. However, there is at least uncertainty regarding the quality of the soil, certainly in respect of the two sites which do not impact upon SSSI (sites 20 and 62). Furthermore, the extent of our client's land holding gives rise to significant opportunity for mitigation.

The SA scoring has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A) to account for this.

SA Objective 16 (To protect and enhance heritage assets which defines the County Borough as the most significant Welsh town of the Industrial Revolution)

The SA framework seeks to assess the effects of development on designated heritage assets. The specific scoring criteria considers the "potential" to have a positive or negative effect. It is not at all clear how such judgements have been made without a greater amount of information and analysis than currently exists – a site including a scheduled monument could quite easily deliver either enhancement or an adverse impact, which could only be determined at the detailed design stage.

In many respects those sites which have the greatest potential to cause harm also (by implication) have the potential to bring forward the greatest benefits by actively embracing the historic environment and working with relevant stakeholders to improve conservation, management, interpretation and access. Only detailed investigation and master planning will establish whether a site is wholly constrained in heritage terms or whether it brings forward important opportunities for enhancement. A key feature of Marvel Ltd's current proposals for development of the land is a desire to preserve and enhance the historic environment.

Accordingly, it is not clear how the Rhydycar West sites have been negatively scored, while other sites have received neutral or positive scores. Indeed, the justification for down-grading the scoring of sites 20, 21 and 23 since the publication of the Initial Sustainability Appraisal appears to be wholly unjustified.

More particularly, the wholly neutral or positive scores for the Hoover site at Abercanaid are questioned, given the concentration of statutorily protected listed buildings in this area of the town, and particularly in view of relevant case law which places an emphasis on the avoidance of harm, either in terms of an asset's physical form and fabric, or in terms of its setting.

The continued dereliction of the on-site heritage structures and their deterioration through scrub and tree growth, ground instability, and human action is actively

detracting from their heritage significance and contribution to the surrounding Landscape of Outstanding Historic Interest. The proposed development options offer an opportunity to not only stabilise the condition of the monuments, but also to improve the management, presentation and public enjoyment of them. Development will mitigate potential impacts by providing suitable buffer areas and standoff distances as well public interpretation information to help tell the rich story of Merthyr and its contribution to world history. Given this potential (and, indeed, stated objective) to integrate, enhance and showcase this heritage, a more positive score has been recorded on the enclosed Revised Sustainability Appraisal (Appendix A).

SA Objective 18 (To protect and enhance the quality of designated areas of landscape value and good quality townscapes)

The SA Framework notes that consideration will be given to the emerging SLAs. As noted in our 5th October representations, we have serious concerns regarding the methodology used to define the SLAs, as set out in the SLA Background Paper. At the same time, we note that the proposed policy EnW20 does not preclude development within SLAs but requires development proposals to be "sensitive to their special characteristics". Therefore the apparent downgrading of potential within the Western Flank SLA on the basis of their location is not comprehensible.

The candidate sites for residential development in the north of Rhydyar West, sites 20, 21, 22 and 23, are all described as greenfield sites, although it is apparent even from the mapping used in the Register that this is an area of former mining and tipping, with some traces of remnant field pattern, and some woodland. The candidate sites all adjoin existing settlement, with good connectivity for foot and cycle access. The landscape/ townscape character is not "well defined", as asserted and overall LANDMAP evaluation in the Visual and Sensory aspect is Moderate. In these candidate sites, development could be designed to integrate with landscape features and character of the site and in turn with its surroundings, without significant adverse effects on landscape or visual amenity, and with potential to improve the landscape/ townscape character. The CSR assessment of major negative effect is not substantiated by any evidence or rationale.

Candidate site 62 is located inside the Hoover Strategic Regeneration Area between the A470 to its west and existing built up/ industrial area of Abercarnaid to its east. It is bounded by a minor road followed by Taf Trail and crossed by a minor road followed by a bridleway connecting under A470. The land use is mainly rough grazing with existing buildings and hardstanding on the part south of the minor road. Overall LANDMAP V&S evaluation is Moderate. The site could accommodate carefully designed residential development, which would have the potential to avoid adverse effects on landscape features important to its character and, indeed, to improve the landscape/ townscape character.

In regard to the candidate Hotel/ Tourist Accommodation site, 61, its location in the proposed SLA does not preclude development, which, as already noted, should be "sensitive to their special characteristics" (EnW20). The candidate site is located largely in an area of relatively modern tip (associated with the construction of the A470) - it is not a greenfield site. Most of the area surrounding it is disused tips. Careful site planning and design could integrate the development proposed with the landscape features, features of industrial heritage interest, with the opportunity to enhance the character of area. The CSR assessment of major negative effect is not substantiated by any evidence or rationale.

Candidate site 28 puts forward the area for a Leisure/ Tourism development. The assessment in the Background Paper for this part of the proposed SLA of "distinctly rural character" and "woodland and natural regeneration which look like natural habitat from a distance" is based upon the appearance of the site from a distance. In fact, much of the naturally regenerating vegetation is occurring on features of industrial heritage, masking the need for treatment and stabilisation of the remnant features. Development on select parts of the site could deliver the required treatment as well as an interesting and desirable Leisure & Tourism development maximising use of the site features. Careful site planning and design could integrate the development with the areas of industrial heritage interest, woodlands and remnant field features, with the opportunity to enhance the landscape character of the site and establish an appropriate character for the development. The proposed development options take into account all of the above and provide a genuine opportunity to improve and enhance the site. The CSR assessment of major negative effect is not substantiated.

Based on the existing information known for the sites the SA scoring has been adjusted on the enclosed Revised Sustainability Appraisal sheets (Appendix A).

Given the above comments and the Revised Sustainability Appraisal sheets attached at Appendix A, we consider the table at page 9 of the CSR is not a fair representation of which sites accord with the LDP Strategy and which do not. If one applies a simple numeric scoring system to the sites (+1 for a Major Positive, -1 for a Major Negative etc), each of our client's Candidate sites moves from a negative score to a positive score as a result of our analysis. In many cases, the positive score exceeds that of other sites which the LPA consider to be compliant with the Preferred Strategy. The Comparative Sustainability Appraisal scoring sheet at Appendix B provides further detail in this regard.

A revised Sustainability Appraisal, a Comparative SA Scoring Sheet, a Sustainable Travel Appraisal Report, a Review of Site Performance against SA Objective 12, and a review of the above sites against SA Objective 13 were included with this representation as Appendices A, B, C, D & E respectively.

132 – Cyfarthfa Ward Sites – Comment

In respect of sites within the settlement of Heolgerrig, please note that there has been a significant deterioration in the bus service to/from Heolgerrig provided by the current contract holder, First Call, since my last response.

The service has recently been reduced from half hourly to hourly, with no service prior to 9am or between 2.30pm and 4pm Monday to Saturday.

This needs to be reflected in your comments about availability and accessibility of public transport in relation to these candidate sites.

142, 157, 158, 159, 161, 255 – Sites 11, 12, 17, 19, 21, 22, 23, 24, 25, 26 & 28 – Objection

We object to proposal/site number 28 and proposals 11, 12, 17, 19, 20, 21, 22, 23, 24, 25 and 26. Since the latter proposals are constituent parts to site 28, the following reasons for objection are applicable either wholly or in part.

1. It does not accord with the Environment Wales Act 2016, Policies EW1 and EW2 as it will destroy both heritage and biodiversity of the site.
2. Does not accord with the Future Generations Act 2015 in as much as a number of interests of acknowledged importance would be harmed by these proposals. Historic landscape, natural habitats and protected species are all acknowledged as crucial aspects of sustainability. Inspectors report 18/09/2006.
3. The whole area proposed is outside the Settlement boundary of Merthyr Tydfil County Borough Council.
4. The total land area comprises 80% protected SSSI and 20% SINCL.
5. The total land area includes 146 public rights of way for which the Council has made Definitive Map Modification Orders.
6. Much of the land is covered by TPO 15.
7. There are 5 Scheduled Ancient Monuments and a further unconfirmed, but consideration, 3 Scheduled Ancient Monuments.
8. Historic Landscape Character Areas 14, 69, 70 and 71 containing 483 sites of historic and archaeological interest, as catalogued by GGAT would be at risk of destruction. The Inspector in 2007 commented "*the proposed development would have a highly severe adverse impact on the Merthyr Tydfil registered historic landscape and on the important archaeological features within it.*"
9. The proposed housing development is not required to make up the housing needs for the Borough as there are other sites to come on line including the old Hoover site and Dowlais steel works. The site is also, as mentioned above outside the settlement boundary. The Inspector commented in 2007 "*...the scale of housing proposed and its location would do nothing for the existing fabric of the town and the housing regeneration needs...Moreover, to permit such a large amount of new housing outside the existing built up area would seriously undermine the prospects for identified housing sites in more accessible and sustainable location within the settlement boundary.*"
10. Proposed retail development on the site would be in direct competition with the current Cyfarthfa Retail Park and Trago Mills development that combined with other retail development around the Borough more than provides for retail use. Any additional retail development would also compromise the town Centre Regeneration Strategy.
11. Any proposed development would require coal reserves to be extracted prior to built development to prevent the sterilisation of coal reserves.
12. The proposal would have a serious adverse impact on the important nature conservation and historic interests of the site and would be unduly harmful to

the visual quality of the landscape to the public amenity value of the site (see attached sheet with alternative use of land at Rhydycar West for the potential development of a World Heritage Site).

13. Development of this has been refused on 2 separate occasions. The latter in 2007 by Planning Inspector because of:-Visual effects – “I conclude that proposals under consideration would have **a significant visual impact on the land...the development would have an unduly harmful visual impact on the landscape.**” Ecology, wildlife and habitats – “the ecology, wildlife and habitat value of the site and locally would be significantly diminished as a consequence of proposals. This is a material consideration which carries significant weight in assessing their overall merits”. Conformity with the Development Plan – “the proposals **fundamentally conflict** with the provisions of the development plan.” Conformity with National Planning Policy “the proposals do not accord with the overall thrust of National Planning policy Guidance...The proposals are clearly contrary to plan-led system and on the use of most appropriately located sites in sustainability terms to meet identified housing, retail and leisure needs.”
14. The principle of proposed development is not considered acceptable and would be contrary to both Planning Policy Wales and the relevant policies in the LDP. It is not considered that any material considerations put forward would outweigh the inappropriate location of the development and development and its subsequent adverse impact on the landscape, nature conservation. Biodiversity, historic interest and the public amenity value of the site.
15. Other legislation to be considered in protecting site 28 are:-
- The Conservation of Habitats and Species regulation 2010 (as amended);
 - EU Birds Directive 2009;
 - Countryside and Rights of way (CROW) Act 2000: 9/28G Duty of Authorities to “Conserve and Enhance SSSI”;
 - EU Habitats Directive 1992;
 - Wildlife and Countryside Act 1981 (as amended) and
 - Merthyr Tydfil Local Development Plan 2006 - 2021 (Adopted May 2021) tree Preservation Order No 15 (1983) Cwm Glo (MTCBC).

244, 268, 271 – Sites 18, 19, 24-27, 31, 35, 40, 42, 43, 55, 58, 59, 68, 76, 86, 87, 89, 90, & 94-97 – Objection, Information and Recommendation.

A review of Merthyr Tydfil's candidate sites in relation to its Open Spaces Strategy shows that one site (35) is located directly adjacent to a 'Priority open space', and five sites (27, 42, 55, 76 & 90) are located on 'Other open spaces'.

Policy SW9 of Merthyr Tydfil's Preferred Strategy states: 'Designated open space will be protected unless its loss is mitigated or compensated by improvements to the quality of other open space'.

Section 4.8 of Merthyr Tydfil's Open Spaces Strategy states: 'No open space should be lost from the Strategy until full consideration has been given to the potential alternative open space uses for the site in order to redress identified shortfalls in that ward'.

Further information on these sites is included below.

Priority open spaces

Site 35: Trevor Close, Dowlais

This candidate site is directly adjacent to a space identified in Merthyr Tydfil's Open Spaces Strategy as a 'Priority open space'. On the Ordnance Survey map, the site is highlighted as a playground.

Merthyr Tydfil's Open Spaces Strategy (section 3.7) states: 'There is no civic space within the ward of Dowlais', and 'Children and young people's play space is also significantly under represented with on only 10% of the population having access to this type of open space.'

Other open spaces

Site 27: Land south of College car park, Cyfartha

This natural/semi-natural greenspace is identified as an 'Other open space' in Merthyr Tydfil's Open Spaces Strategy.

Merthyr Tydfil's Open Spaces Strategy (section 3.5) highlights there are six types of open space within Cyfartha ward to which more than 50% of the ward's population do not have access, and 100% of the ward's population do not have access to amenity greenspace.

Site 42: Gurnos Farm, Gurnos

This natural/semi-natural greenspace is identified as an 'Other open space' in Merthyr Tydfil's Open Spaces Strategy.

Merthyr Tydfil's Open Spaces Strategy (section 3.9) states that amenity greenspace is the least accessible space within the Gurnos ward, with the entire ward's population failing to meet the accessibility standard set for this type of open space.

Site 55: Land at Chapel Banks/Adj to Joseph Parry's Cottage, Park

This amenity greenspace is identified as an 'Other open space' in Merthyr Tydfil's Open Spaces Strategy.

Site 76: Land south of Merthyr Tydfil Industrial Park/Sekis

This multifunctional greenspace is identified as an 'Other open space' in Merthyr Tydfil's Open Spaces Strategy.

Site 90: Former St Tydfils Hospital, Town

This is identified as an 'Other open space' in Merthyr Tydfil's Open Spaces Strategy.

Merthyr Tydfil's Open Spaces Strategy (section 3.20) states there is no provision of allotment and community growing space within the ward, and there is poor accessibility to children and young people's play space with almost 60% of Town's ward population not having access to this type of space within the recommended distance.

A number of developments contained in this register propose a change of use from green space/recreational amenities as follows:

Numbers 18, 19, 24, 25, 26 – loss of green space to residential

Number 31 – there is no green space evident in this area and the proposed residential area is adjacent to a playground. Number 35 also proposes the loss of the playground to residential development.

Number 40 – already a dense residential area with no green space

Number 43 – this area is adjacent to school playing fields (was this part of the school field) and again restricts green space.

Numbers 58 59 – represent loss of green space/playing fields in dense residential areas.

Number 68 – this site is adjacent to the Glamorgan Canal – is there potential for alternative development to enhance walking/cycling/leisure opportunities?

Numbers 86 & 87 – represent the loss of recreational space/ playground/amenities

Number 89 – Could this be an opportunity to re-purpose the Miner's Hall for alternative community use/amenities?

Numbers 94, 96, 97 - represent the loss of green space/ informal recreation in areas that already have dense housing development, but the most striking example of this is Number 95, where the football ground is the only green space in this area of dense housing and is a potential community asset/amenity.

255 – Sites 11,12, 17, 19-26 & 28 – Objection

Candidate Sites Register Comment

We object to proposal/site number 28 and proposals 11, 12, 17, 19, 20, 21, 22, 23, 24, 25 and 26. Since the latter proposals are constituent parts to site 28, the following reasons for objection are applicable either wholly or in part.

16. It does not accord with the Environment Wales Act 2016, Policies EW1 and EW2 as it will destroy both heritage and biodiversity of the site.
17. Does not accord with the Future Generations Act 2015 in as much as a number of interests of acknowledged importance would be harmed by these proposals. Historic landscape, natural habitats and protected species are all acknowledged as crucial aspects of sustainability. Inspectors report 18/09/2006.
18. The whole area proposed is outside the Settlement boundary of Merthyr Tydfil County Borough Council.
19. The total land area comprises 80% protected SSSI and 20% SIN.
20. The total land area includes 146 public rights of way for which the Council has made Definitive Map Modification Orders.
21. Much of the land is covered by TPO 15.
22. There are 5 Scheduled Ancient Monuments and a further unconfirmed, but consideration, 3 Scheduled Ancient Monuments.
23. Historic Landscape Character Areas 14, 69, 70 and 71 containing 483 sites of historic and archaeological interest, as catalogued by GGAT would be at risk of destruction. The Inspector in 2007 commented *"the proposed development would have a highly severe adverse impact on the Merthyr Tydfil registered historic landscape and on the important archaeological features within it."*
24. The proposed housing development is not required to make up the housing needs for the Borough as there are other sites to come on line including the old Hoover site and Dowlais steel works. The site is also, as mentioned above outside the settlement boundary. The Inspector commented in 2007 *"...the scale of housing proposed and its location would do nothing for the existing fabric of the town and the housing regeneration needs...Moreover, to permit such a large amount of new housing outside the existing built up area would seriously undermine the prospects for identified housing sites in more accessible and sustainable location within the settlement boundary."*
25. Proposed retail development on the site would be in direct competition with the current Cyfarthfa Retail Park and Trago Mills development that combined with other retail development around the Borough more than provides for retail use. Any additional retail development would also compromise the town Centre Regeneration Strategy.
26. Any proposed development would require coal reserves to be extracted prior to built development to prevent the sterilisation of coal reserves.

27. The proposal would have a serious adverse impact on the important nature conservation and historic interests of the site and would be unduly harmful to the visual quality of the landscape to the public amenity value of the site (see attached sheet with alternative use of land at Rhydycar West for the potential development of a World Heritage Site).
28. Development of this has been refused on 2 separate occasions. The latter in 2007 by Planning Inspector because of: Visual effects – “I conclude that proposals under consideration would have **a significant visual impact on the land...the development would have an unduly harmful visual impact on the landscape.**” Ecology, wildlife and habitats – “the ecology, wildlife and habitat value of the site and locally would be significantly diminished as a consequence of proposals. This is a material consideration which carries significant weight in assessing their overall merits”. Conformity with the Development Plan – “the proposals **fundamentally conflict** with the provisions of the development plan.” Conformity with National Planning Policy “the proposals do not accord with the overall thrust of National Planning policy Guidance...The proposals are clearly contrary to plan-led system and on the use of most appropriately located sites in sustainability terms to meet identified housing, retail and leisure needs.”
29. The principle of proposed development is not considered acceptable and would be contrary to both Planning Policy Wales and the relevant policies in the LDP. It is not considered that any material considerations put forward would outweigh the inappropriate location of the development and development and its subsequent adverse impact on the landscape, nature conservation. Biodiversity, historic interested and the public amenity value of the site.
30. Other legislation to be considered in protecting site 28 are:-
- The Conservation of Habitats and Species regulation 2010 (as amended);
 - EU Birds Directive 2009;
 - Countryside and Rights of way (CRoW) Act 2000: 9/28G Duty of Authorities to “Conserve and Enhance SSSI”;
 - EU Habitats Directive 1992;
 - Wildlife and Countryside Act 1981 (as amended) and
 - Merthyr Tydfil Local Development Plane 2006 - .2021 (Adopted May 2021) tree Preservation Order No 15 (1983) Cwm Glo (MTCBC).

280 – Site 19-26 – Objection

Cyfarthfa 19-26 inclusive.

Proposed usages: Residential/Mixed Use Built Developments. Not Recommended.

All candidate sites are outside the settlement boundary in “open countryside” and are integral elements of the Cwmglo/Glyndyrys SSSI. Residential and Mixed Use Built Development would undermine the integrity of the SSSI and is contrary to National

and Local Planning Policy. Previous plans on this site have been turned down due to the harm they would cause.

3. Representations in Relation to Specific Candidate Sites

282 – Site 4 – Objection

Introduction

Both my husband and I are the owners and residents of Garthgynydd Farm, Bedlinog. As residents, we are taking close interest in the preparation of the First Replacement Merthyr Tydfil Local Development Plan 2016-2031. This includes the Pre-deposit (Preferred Strategy) Consultation currently being undertaken.

Of particular interest is the land adjacent to Craig-y-Hendre (Site Number 4, measuring 0.56 ha in size). The land immediately adjoins our established access road to the farm. We have reviewed the documentation in the candidates sites register and the assessment of the land carried out to date. Having done so, we wish to object to the proposed modification described in the amended Candidate Sites Register for the land.

Our objection is put forward on the basis that the site (and assessment of it) do not address the following area of concern and as such do not make this proposal acceptable as a sustainable and deliverable housing allocation:

- The impact of the proposal on the surrounding landscape and open space.
- Lack of the infrastructure supporting future developments.

The paragraphs below set out our objection in more detail.

The impact of the proposal on the surrounding landscape and open space

The site is located immediately adjacent to the settlement boundary of Bedlinog. Significantly, it adjoins an area of well-maintained public open space and sports provision enjoyed by residents in this area of the village. It is considered that the open nature of the site, its relationship with the nearby open space and the views afforded across the wider area make a significant contribution to the landscape quality and amenity of this area of the village. Collectively, they result in soft and effective transition between the built edge of the village and the surrounding countryside.

The combination is integral to the character and function of the eastern edge of the village. It ensures the gradual transition from urban to rural landscape character. Moreover, the fine grain of the urban area and narrow nature of the residential streets (George Street and Lewis Street) accessing this area of the village contrast nicely to the open nature of the site and surrounding land. The relatively low density of the modern housing facing the public open space at the end of the access road contributes to this transition.

The land in question forms part of the open space. It is open, affords views down the valley and across to the higher ground. It offers functional open space adjacent to

the more formally laid out open space. This variety and openness is a vital element in the functionality of the space for local residents in the village. It is a vital element in the character of the immediately locality, contributing successfully to the effective transition between the urban area of the village and accessible countryside beyond.

Additional residential development on the site would destroy the effective function of the space to its significant detriment in terms of:

- Function as effective open space serving the people of the village.
- Landscape character and the soft transition between the settlement edge and the accessible local countryside.
- Long range views across the local area and a sense of openness that would significantly undermine the quality and character of the landscape and, importantly, the public open space that is so vital in this area of the village.
- Infrastructure – increased road widths, volume and speed of traffic will be evident along the access lane should additional housing be developed in this location.

The introduction of additional development would result in a far stronger barrier between the built and natural environment. It is demonstrated above that this would result in a series of detrimental landscape impacts that are unacceptable in this location.

On this basis, it is considered that the Initial Sustainability Appraisal (June 2017) and its assessment of the Candidate Site should be revised, as follows:

- LDP Objective 4 – development on the site would be incompatible (red and -2) with the objective of ensuring the provision of infrastructure and open space is the basis for the regeneration of communities.
- LDP Objective 9 – development on the site would be incompatible (red and -2) with the objective of improving habitats which contribute to ecosystem resilience and connectivity. It would be far better to utilise the space as part of the soft landscape connective with the urban edge, open space and wider countryside.
- LDP Objective 10 – development on the site would be incompatible (red and -2) with the objective of protecting and enhancing the character and appearance of the landscape and countryside.
- LDP Objective 12 - development on the site would be incompatible (red and -2) in that it would make no contribution to the strengthening and diversification of the rural economy.

On this basis, it is evident that there are more suitable, sustainable and deliverable Candidate Sites for development in this area of the County Borough. Such sites are preferable as they would not result in the significant adverse impacts on landscape and open space.

Lack of the infrastructure supporting future developments

As there is a limited public transport, footpaths and cycle paths, it is likely that the primary mode of transport from the site will be car.

There is no direct car access to the site apart from a narrow, tarmacked lane, which was provided and maintained by a private owner of the property nearby. Any development would require providing the necessary infrastructure to the site, including the significant improvement of the access road.

The increase in road width and standard will impact adversely on the area in terms of:

- Safety – the access road is narrow and slow at present, offering a natural traffic calming measure that suits the open space and landscape function of the area. Widening the road would erode this benefit of the access road, change its character and is likely to increase safety concerns owing to higher volume and speed of traffic.
- Services – it is known that water services cross the land in question to service our property. Any development of the land could impact negatively on this provision. Moreover, any development should take into account such provision and the need for it to be maintained. In turn, this could well undermine the deliverability of the site going forward. It will be important for the Council to address this matter prior to the Deposit stage of the plan.

Summary and Conclusion

On the basis of the foregoing analysis, it is considered that the Candidate Site 4 should not be taken forward as a development allocation in the Deposit Plan. The likely adverse environmental and social impacts of doing so are significant.

129 – Site 6 – Objection

Caerphilly CBC would raise an objection to the allocation of Bedlinog Site 6 Land East of Trelewis due to the potential detrimental and damaging impact of such development on the setting of Grade I listed building Llancaiach Fawr.

129 – Site 6 – Objection

As part of the Preferred Strategy consultation held earlier this year, Caerphilly CBC raised concerns in respect of Site Number 6 – Land to the East of Trelewis, due to the potential detrimental and damaging impact of such development on the rural setting and wider historic environmental context of Grade I listed Llancaiach Fawr Manor. Caerphilly CBC continues to object to the principle of housing on this site.

The assessment in relation to SA Objective 16 regarding the protection and enhancement of heritage assets makes reference to the proximity of Llancaiach Fawr Manor as a Grade 1 building, but does not reference the Grade 2 listed Barn

adjacent to Llancaiach Fawr as another asset. The score given to the sustainability effect of this allocation is 'Uncertain' as further surveys and assessments are deemed necessary to establish the impact. It is considered that it would be appropriate to carry out a Heritage Impact Assessment and prepare a heritage impact statement along the lines of paragraphs 2-6 of 2.3 page 4 of the WG/Cadw's Heritage Impact Assessment Wales document (May 2017). Caerphilly CBC would welcome the opportunity to comment on any Assessments that are submitted for this site.

250 – Site 6 – Objections, Recommendations

Site number 6- Land to the east of Trelewis:

It is difficult to understand how a decision can be reached whereby the value of the green wedge which previously designated has been recognised, regarded as having done its 'job' in limiting development and then deciding that it is no longer necessary and therefore it is appropriate to build houses on it instead. It is not a logical argument.

In your review document of Green wedges- you clearly state in 7.4.2 on page 17 that the benefit of the green wedge designation includes maintaining the integrity of the distinctive and rare landscape and helping to protect biodiversity interests, such as the Nant Caeach SINC. You now propose to disregard these concerns for a landscape which, once lost, will never be recovered.

Land to the west of the Afon Caiach was required to be kept clear of buildings and light pollution in the Redrow development of Manor View due to the use of the river as an environmental corridor for bats and otters. If MTCBC is arguing that 'BW5: Natural Heritage' achieves the same aim to maintain valuable open spaces between settlements then you must take into account the habitat needs of the flora and fauna of the natural heritage along the river line south of the B4254 as you did to the north of the road- and prevent the modern development of the western bank of the river.

The designation of the candidate site takes no regard for the setting of the grade 1 listed building which it borders on the Caerphilly CBC side of the local authority boundary. Any development in the candidate site would have a serious and detrimental effect upon the setting of the Manor House and its immediate landscape and would be in contravention of paragraph 6.5.11 of Planning Policy Wales, Edition 9, November 2016- chapter 6- The Historic Environment

'6.5.11 There should be a general presumption in favour of the preservation of a listed building and its setting, which might extend beyond its curtilage. For any development proposal affecting a listed building or its setting, the primary material consideration is the statutory requirement to have special regard to the desirability of preserving the building, its setting or any features of special architectural or historic interest which it possesses. The aim should be to find the best way to protect and enhance the special qualities of listed buildings, retaining them in sustainable use.'

I also refer you to the whole of the WG's Best-Practice Guidance document 'Setting of Historic Assets in Wales May 2017' which is also relevant to the submission and determination of any planning application to build houses in such close proximity to the manor. The loss of the remaining western portion of the original 16th and 17th century estate land will have a material and detrimental effect of the interpretation of the manor and its operation as a leading 'Living History Museum' which provides employment for many MTCBC residents and brings considerable visitor spend to the businesses in the locality.

103 - Site 8 – Recommendation

Nature Conservation:

The eastern boundary of the site is located immediately adjacent to nationally important habitats forming a potential candidate SSSI. Development within this site will require careful consideration to avoid impacts on this area/ candidate SSSI. The type and nature of the development, as well as detailed design and configuration will be important to avoid adverse effects. Further discussions with us will be required if this site is considered further.

132 – Site 8 – Objection

Cyfarthfa 8 Land between Swansea Road & A465 - 7.15ha.

Proposed use:- Residential. Not Recommended. It is a large greenfield site which suffers from poor access and a lack of adjacent community facilities.

Given the amount of land within Zone C2 we recommend amending the site boundary in the first instance. If not, further information/flood consequences assessment will be required to establish whether the risks and consequences of flooding can be found to be manageable in line with TAN15 criteria.

207 – Site 8 – Objection

Objection: The Heritage Trust does not wish to see the loss of open countryside at this side – which will be affected by the A465 widening. Access seems inadequate. A footpath would be lost. There are potentially heritage and archaeological features here. Development would be outside the settlement area. The impact on the historic landscape would be very high.

280 – Site 8 – Objection

Cyfarthfa 8 Land between Swansea Road & A465 - 7.15ha.

Proposed use:- Residential. Not Recommended.

This is a large greenfield site which suffers from poor access and a lack of adjacent community facilities. Some of the site may be required as part of the A465 Dualling work between Dowlais Top and Hirwaun both during construction phase and once work is completed.

103 – Site 9 – Recommendation

Flood Risk

The site has a very small area on the northern boundary within Zone C2. The flood risk is from the Nant Ffrwd. The flood map is based on generalised Flow modelling and not detailed flood risk modelling.

The proposal includes highly vulnerable development in C2 which should not be permitted.

132 – Site 9 – Objection

Residential. Not Recommended. A greenfield site outside the current settlement boundary. Access via subway under the A465 and Cyfarthfa originally built for farm animals. Lack of adjacent facilities.

207 – Site 9 – Objection

Objection: This site borders the Brecon Beacons National Park and will be affected by the Heads of the Valleys Road. It is outside the settlement boundary. The Heritage Trust is of the view that impact on the historic and national landscapes would be massive. The site will be affected by the A465 development and the access seems to be totally inadequate.

280 – Site 9 – Objection

Cyfarthfa 9 Land North of A465- 3.16ha.

Proposed Use: Residential. Not Recommended.

A greenfield site outside the current settlement boundary.

Access is via a subway under the A465 which was originally built for farm animals. Lack of adjacent facilities.

132 – Site 10 – Objection

Residential. No Recommended. A proposed Special Landscape Area. Poorly serviced by Public Transport. A area of great ecological, archaeological and cultural interest. Outside existing settlement boundary. A lack of adjacent community facilities.

207 – Site 10 - Objection

Objection: This is a proposal for substantial housing development on the heritage landscape of Winchfawr. It is outside the settlement boundary. A large number of heritage sites and assets are located here – details are in the Environmental Statement documents for the A465 Sections 5 & 6 project (published in July 2017). There would be a substantial adverse impact on both the historic landscape and the natural landscape if development went ahead. Miners Hall if these structures are conserved and restored (albeit in some case façade only).

The A465 Environmental Statement also indicates that there will be a substantial impact on the natural environment and proposals to mitigate the impact of the widened highway. The Heritage Trust has pointed out that the area is likely to contain a number of shallow workings – as evidenced by the number of spoil tips. Both tips and workings can be part of the historic heritage landscape and environment.

280 – Site 10 – Objection

Cyfarthfa 10 Land to the West of Winchfawr Rd (77.69ha).

Proposed Use: Residential. Not Recommended.

This is a proposed Special Landscape Area. It is poorly serviced by Public Transport. It is an area of great ecological, archaeological and cultural interest. Indeed in the EIA submitted as part of the Bryn-y-Gwyddell opencast planning application in 1990's, the site met SSSI status. A subsequent application for what was then called West Winchfawr opencast mine planning application stated that the landowner had allowed the land to become degraded, which meant it narrowly missed out on being classified as a SSSI. It is outside existing settlement boundary. There is a lack of adjacent community facilities.

103 – Site 11 – Requirement

Nature Conservation

Development within this site will require. The type and nature of the development, as well as detailed design and configuration will be important to avoid adverse effects on the SSSI. Further discussions with us will be required if this site is considered further.

113 – Site 11 - Support

To ensure that the community and social infrastructure needs of all residents and communities are met

Reported: The site is located within 800m of the local shops, pub, post office and Primary School in Heolgerrig

Response: The site has a bus stop at the end of the lane which affords transportation to all GP surgeries and Cyfarthfa Retail Park, through sustainable transport. Additionally, the lane is a claimed right of way which affords the opportunity for walking, cycling and horse riding.

To maintain and enhance community and settlement identities.

Reported: The development of the site would result in a significant number of new dwellings in a location that is physically separated (at least 100m) from the existing settlement.

Response: This separation is created by the presence of a football field. It is not unusual in Merthyr for properties to be separated by this amount of open space, when that open space is for recreational use, and for the community to encircle it. e.g Thomastown and Cyfarthfa Park.

To improve human health and well-being and reduce inequalities

Reported: The site is located adjacent to an area of open space as identified by the Open Space Strategy, however, most open space and sports/leisure facilities are over 400m away.

Response: The site lies on the boundary line of an area of higher deprivation (LSOA W01001293: Cyfarthfa 3). Other sites have been scored more favourably due to their proximity of Cyfarthfa 3. Therefore this site should also be weighed against that merit.

To reduce the need to travel and encourage sustainable modes of transport

Reported: The majority of the site is not within reasonable walking distance (100m), without impediment, to an active travel or a key pedestrian or cycling route, nor is it within 800m of a train station or a bus stop (400m) with a frequent service (every half hour).'

Response: A claimed right way runs along the bottom edge of the site, and is currently in use as a cycle and footpath route. Therefore all of the site is within 100m of a key pedestrian and cycle route. While greater than 400m, the nearest bus stop is 643m away and runs a very frequent service every 15 mins. Therefore sustainable modes of transport are evident within the area of this site.

To ensure essential utilities and infrastructure are available to meet the needs of all

Reported: There is an element of uncertainty, most likely until more detailed assessments have been carried out through planning applications. While utility providers have not indicated any major issues with the provision of new housing within the County Borough, given the size of the site, and the potential number of new dwellings it could accommodate, it is considered that more detailed assessments are required in this respect.

Response: Site 11 is adjacent to my other site submission site 12. Therefore the finding for both sites in terms of infrastructure should be the same. Heolgerrig service and infrastructure has received considerable upgrading over the last five years to accommodate new builds that have been granted planning permission. It would seem reasonable to expect that planning for future development has been incorporated into these recent upgrades.

To minimise efficiency use and optimise opportunities for renewable energy generation.

Reported: The site is not promoted for renewable or low carbon energy and it is unclear whether it has the potential to support renewable technologies.'

Response: The application is merely a submission of sites for proposed inclusion in the development boundary. Renewable and low carbon energies can be considered and mitigated at planning consent stage as part of that process. Practical constraints to the delivery of renewable and low carbon energy have not been identified. However, due to its proximity to the Cwm Glo a Gynderys SSSI it is viewed more sensible to identify the merits of renewal energy against the cost to the environment in other forms at detailed planning stage.

To minimise the contribution to climate change whilst maximising resilience to it

Reported: The site is green field and does not contain any best and most versatile agricultural land

Responded: The site is private land with no rights of way registered or unregistered having access across it. Therefore is cannot be identified an Open Space for recreation. Most of the land is poor quality grass which struggles to maintain livestock. Neither is the grassland of quality or quantity to currently or future house important habitats. Under Agricultural Subsidy Classification this ground is deemed as rough grazing and consequently previously attracted subsidy in recognition of that.

To maintain and enhance biodiversity and ecosystem connectivity.

Reported: The site is directly adjacent to and partially within the Cwm Glo a Glyndyrys SSSI (CCW 2008 Notification) and the Cwm Glo SINC. Development at the site has the potential for negative effects on a nationally designated site

Responded: The site is adjacent to the Cwm Glo a Glyndyrys SSSI and Cwm Glo SINC but is **NOT** partially within it. The SSSI adjoins two sides of the site. Planning had been actualised close to this site where Nant Pant Bach was built (rear of Heolgerrig Club). In that development the building of houses next to the SSSI was mitigated to a point where planning was granted and the properties were built.

Within this site a barn and stables has been built and negative possible impacts were successfully mitigated. Any potential future negative effects can also be mitigated through the detailed planning application process.

To minimise the risk of flooding.

Reported: Parts of the site are located within an areas at risk of surface water flooding (intermediately susceptible according to EA guidance). Further detailed assessment work is considered necessary.

Response: NRW Flood Map for Planning and Risk of Flooding from Surface Water indicates a risk from flooding from the stream. However this stream runs through an area with high sided ravines on both side of the stream. Therefore the risk is unlikely.

Surface water run off has been successfully mitigated and drainage options passed through the planning application on this site for the barn and stables which have since been built. Consequently this is not a risk that cannot be overcome, providing neighbouring owners of water sources and drainage uphold their responsibility under the Council's Flood Risk Management Plan.

To protect and conserve soil and safeguard mineral resources.

Reported: The site is mainly green field and there is no clear mitigation for the impact on soil. The site is within a coal safeguarding area (MTAN 2 Coal 2009, & Minerals Resources Map for South East Wales, 2010).

Response: As explained above under farming classification the site is rough grazing. The majority of the sites on the candidate site list are within a coal safeguarding area. However, since the birth of this document significant developments have been built in spite of the safeguarding. Therefore by precedent there must be opportunity to mitigate the safeguarding of a primary shallow coal resource against the need for the built environment.

To protect and enhance the quality of designated areas of landscape value and good quality townscapes.

Reported: The site is within the draft Merthyr West Flank SLA where the landscape or townscape character is well defined. Potential for major residual negative effect.

Response: This site does not sit within a Conservation Area nor is it near a Scheduled Monument; Listed Building; Registered Historic Parks and Gardens and/ or their setting. Mitigation for development already has precedent as a barn and stables have been successfully built without any detriment to the adjoining SSSI. Development of this site would encircle a designated open space which would fit with existing townscape character already in existence in the Borough and within the Merthyr West Flank SLA.

132 – Site 11 & 12 – Objection

Residential. Not Recommended. Both sites are outside the Settlement Boundary. Greenfield, suffer from poor access and adjacent community facilities. Part of Cwmglo/Glyndyrys SSSI and West Merthyr Flank of Special Landscape Area.

207 - Site 11 - Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

280 – Site 11&12 – Objection

Cyfarthfa 11 & 12 Land to the South of Moodies Field.

Proposed Use: Residential. Not Recommended.

Both sites are outside the Settlement Boundary. They are both greenfield sites, and suffer from poor access and adjacent community facilities.

The site forms part of the Cwmglo/Glyndyrys SSSI and West Merthyr Flank of Special Landscape Area.

103 – Site 12 – Recommendation

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

113 – Site 12 – Support

To ensure that the community and social infrastructure needs of all residents and communities are met

Reported: The site is located within 800m of the local shops, pub, post office and Primary School in Heolgerrig

Response: The site has a bus stop at the end of the lane which affords transportation to all GP surgeries and Cyfarthfa Retail Park, through sustainable transport. Additionally, the lane is a claimed right of way which affords the opportunity for walking, cycling and horse riding.

To maintain and enhance community and settlement identities.

Reported: The development of the site would result in a significant number of new dwellings in a location that is physically separated (at least 100m) from the existing settlement.

Response: This separation is created by the presence of a football field. It is not unusual in Merthyr for properties to be separated by this amount of open space, when that open space is for recreational use, and for the community to encircle it. e.g Thomastown and Cyfarthfa Park.

To improve human health and well-being and reduce inequalities

Reported: The site is located adjacent to an area of open space as identified by the Open Space Strategy, however, most open space and sports/leisure facilities are over 400m away.

Response: The site is also situated within Cyfarthfa 3 which would deliver new development in an area of higher deprivation (LSOA W01001293: Cyfarthfa 3).

To reduce the need to travel and encourage sustainable modes of transport

Reported: The majority of the site is not within reasonable walking distance (100m), without impediment, to an active travel or a key pedestrian or cycling route, nor is it within 800m of a train station or a bus stop (400m) with a frequent service (every half hour).'

Response: A claimed right away splits at the top end of the site and runs down either long end of the site merging along the bottom edge. The claimed ROW is currently in use as a cycle and footpath route. Therefore all of the site is within 100m of a key pedestrian and cycle route. While greater than 400m, the nearest bus stop is 643m away and runs a very frequent service every 15 mins. Therefore sustainable modes of transport are evident within the area of this site.

To minimise efficiency use and optimise opportunities for renewable energy generation.

Reported: The site is not promoted for renewable or low carbon energy and it is unclear whether it has the potential to support renewable technologies.'

Response: The application is merely a submission of sites for proposed inclusion in the development boundary. Renewable and low carbon energies can be considered and mitigated at planning consent stage as part of that process. Practical constraints to the delivery of renewable and low carbon energy have not been identified. However, due to its proximity to the Cwm Glo a Gynderys SSSI it is viewed more sensible to identify the merits of renewal energy against the cost to the environment in other forms at detailed planning stage.

To minimise the contribution to climate change whilst maximising resilience to it

Reported: The site is green field and does not contain any best and most versatile agricultural land

Responded: The site is private land with no rights of way registered or unregistered having access across it. Therefore is cannot be identified an Open Space for recreation. Most of the land is poor quality grass which struggles to maintain livestock. Neither is the grassland of quality or quantity to currently or future house important habitats. Under Agricultural Subsidy Classification this ground is deemed as rough grazing and consequently previously attracted subsidy in recognition of that.

To protect and conserve soil and safeguard mineral resources.

Reported: The site is mainly green field and there is no clear mitigation for the impact on soil. The site is within a coal safeguarding area (MTAN 2 Coal 2009, & Minerals Resources Map for South East Wales, 2010).

Response: As explained above under farming classification the site is rough grazing. The majority of the sites on the candidate site list are within a coal safeguarding area. However, since the birth of this document significant developments have been built in spite of the safeguarding. Therefore by precedent there must be opportunity to mitigate the safeguarding of a primary shallow coal resource against the need for the built environment.

To protect and enhance the quality of designated areas of landscape value and good quality townscapes.

Reported: The site is within the draft Merthyr West Flank SLA where the landscape or townscape character is well defined. Potential for major residual negative effect.

Response: This site does not sit within a Conservation Area nor is it near a Scheduled Monument; Listed Building; Registered Historic Parks and Gardens and/ or their setting. Development of this site would encircle a designated open space which would fit with existing townscape character already in existence in the Borough and within the Merthyr West Flank SLA.

132 – Site 13 – Objection

Residential. Not Recommended. The site is not well connected to Public Transport. Is greenfield and would result in the loss of important wetland habitat/site if development took place. Reduction in open green space between Twyncarmel and Heolgerrig.

207 – Site 12 - Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

207 – Site 13 - Comment

Comment: although there appear to be no heritage assets on this site access appears to be a concern.

280 – Site 13 – Objection

Cyfarthfa 13 Trago Mills Site 1 (2.58ha)

Proposed Use: Residential. Not Recommended.

The site is not well connected to Public Transport and access would be an issue. It is a greenfield site and its use for housing would result in the loss of important wetland habitat/site if development took place. The site is home to the European Protected Species The Great Crested Newt. A relocation scheme as part of the neighbouring Beacon Heights development resulted in a loss of the relocated Newt population. It would also lead to a reduction in open green space between Twyncarmel and Heolgerrig.

132 – Site 14 – Objection

Retail. Not Recommended. Allocation of additional retail site will undermine the Retail Town Centre Hierarchy and the vitality and viability of The Merthyr Tydfil Town Centre.

207 - Site 14 - Comment

Comment: although there appear to be no heritage assets on this site access appears to be a concern.

248 – Site 14 – Recommendation

The site listed in the Candidate Sites Register as site 14 – Trago Mills site 2, was nominated as an extension to the existing permitted retail development which is currently under construction. Specifically, the development proposed was most likely to be as a garden centre which would be a low density, low impact development which would be well related to the existing retail offer.

It is not appropriate to extend the Trago Mills development by way of a Town centre store, and the proposed area for expansion represents the best and only realistic expansion area for the store.

280 - Site 14 - Objection

Cyfarthfa 14 Trago Mills Site 2 (2.07ha)

Proposed Use Retail. Not Recommended.

Allocation of additional retail site will undermine the Retail Town Centre Hierarchy and the vitality and viability of The Merthyr Tydfil Town Centre. There is already major congestion on the Cyfarthfa Retail park Roundabout. The Welsh Government is currently studying options to improve this but further retail development off this roundabout is likely to undermine any potential solution due to restricted access to the Trago Mills site.

132 - Site 15 – Support

Residential. Recommended. This site is conveniently located near to a well serviced bus route and affordable housing in Erw Las, Gellideg.

207- Site 15 – Objection

Objection: development of this site would have an impact on the neighbouring chapel and the loss of green open space.

280 – Site 15 - Support

Cyfarthfa 15 Land at Erw Las Gellideg (0.35ha)

Proposed Use: Residential. Recommended.

This site is conveniently located near to a well serviced bus route and affordable housing in Erw Las, Gellideg. There are shops on the estate as well as a Wellbeing Centre being constructed which will further enhance opportunities for the community.

132 - Site 16 – Support

Employment. Recommended. The development of this vacant site would complement the existing adjacent employment Sites of The Orbit Business Centre Police Bridewell Suite and the EE Complex.

207 – Site 16 – Comment

Comment: the Heritage Trust is aware of parking problems in the area – but development of some units might also leave scope for improved parking. The Heritage Trust is not aware of any heritage assets on this reclaimed site.

280 – Site 16 – Support

Cyfarthfa 16 Rhydycar/Orbit (1.31ha)

Proposed Use: Employment. Recommended.

The development of this vacant site would complement the existing adjacent employment Sites of The Orbit Business Centre, South Wales Police Bridewell Suite, Welsh Government Building and the EE Complex. Parking may be an issue if not carefully planned as inadequate parking was allowed for at the Welsh Government building which has led to parking issues in the area.

132 - Site 17 – Support

Residential. Recommended. The site is adjacent to the Brondeg Estate and a well-designed extension could meet the need for additional affordable housing.

207 – Site 17 – Comment

Comment: the Heritage Trust is concerned that development may encroach onto the old ironworks tramways – and also impact on the highway developed along the line of the Cyfarthfa Works Railway. Access also seems problematic. This site has the potential to be a key location for gateway facilities to Rhydycar West / West Merthyr for a heritage country park. Unsympathetic development might conflict with this potential countryside access.

280 – Site 17 – Support

Cyfarthfa 17 Brondeg (0.77ha)

Proposed Use: Residential. Recommended.

The site is adjacent to the Brondeg Estate and if well-designed, could meet the need for additional affordable housing. Care will need to be taken due to the sites proximity to Upper Colliers Row, the Cwmglo/Glynryys SSSI and West Merthyr Flank of Special Landscape Area.

132 – Site 18 – Support

Residential. Recommended. The site is allocated for residential development in the current adopted LDP.

207 – Site 18 – Comment

Comment: the Heritage Trust is of the view that high quality landscaping would be needed. Also that the existing ramp access to the A470 footbridge is not up to the latest standards and needs improvement. Even in its present state it may conflict with residential development close by (with overlooking).

280 – Site 18 - Support

Cyfarthfa 18 Upper Georgetown Plateau (2.15ha)

Proposed Use: Residential. Recommended.

The site is allocated for residential development in the current adopted LDP.

103 – Site 19 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

132 – Site 19-26 – Objection

Proposed usages Residential/Mixed Use Built Developments. Not Recommended. All candidate sites are outside the settlement boundary in “open countryside” and are integral elements of the Cwmglo/Glyndyrys SSSI. Residential and Mixed Use Built Development would undermine the integrity of the SSSI and is contrary to National and Local Planning Policy.

136 – Site 19 – Request

You will recall that there is considerable correspondence within your department regarding my application for the construction of a single dwelling resting immediately on the proposed boundary line.

1. Will you as part of the consultation exercise, reconsider my application and marginally alter the proposed boundary line to the road above my land?
2. May I respectfully refer you to Policy SW4 which is highlighted in your Development Plan, which is to encourage development within the urban areas?

I have taken the opportunity to discuss the development plan with all the neighbours surrounding my land and am pleased to inform you that nobody would put forward an objection.

103 – Site 20 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

207 – Site 19 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydyar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

115 – Site 20 - Support

Key benefits of Site 20 – residential:

- Well located to existing settlement (Heolgerrig) and associated shops and services;
- Highly accessible by foot and cycle including footbridge over A470;
- Good and sustainable vehicle access;
- Overlaps with and extends existing Unitary Development Plan (UDP) housing allocation;
- Able to provide Public Open Space to serve development and existing surrounding population;
- Avoids sensitive ecology;
- Deliverable, constraint-free site for c.112 homes.

207 – Site 20 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydyar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 21 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

115 – Site 21 – Support

Key benefits of Site 21 – residential:

- Well located to existing settlement (Heolgerrig) and associated shops and services;
- Highly accessible by foot and cycle including footbridge over A470;
- Good and sustainable vehicle access;
- Overlaps with and extends existing UDP housing allocation;
- Able to provide Public Open Space to serve development and existing surrounding population;
- Avoids sensitive ecology;
- Deliverable, constraint-free site for c.170 homes.

207 – Site 21 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 22 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

115 – Site 22 – Support

Key benefits of Site 22 – residential:

- Well located to existing settlement (Heolgerrig) and associated shops and services;
- Highly accessible by foot and cycle, including footbridge over A470;
- Good and sustainable vehicle access;
- Overlaps with and extends existing UDP housing allocation;

- Able to provide significant Public Open Space to serve development and existing (underprovided)
- surrounding population;
- Minimises impact on sensitive ecology and allows for appropriate mitigation, as required;
- Deliverable site with few constraints for c.340 homes.

207 – Site 22 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr/Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 23 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

115 – Site 23 – Support

Key benefits of Site 23 – residential:

- Well located to existing settlement forming a natural extension in the 'corner' between Merthyr
- Tydfil and Heolgerrig;
- Highly accessible by foot and cycle, including footbridge over A470;
- Good and sustainable vehicle access;
- Overlaps with and extends existing UDP housing allocation;
- Able to provide significant Public Open Space to serve development and existing (underprovided)
- surrounding population;
- Allows for appropriate mitigation, as required;
- Deliverable site with manageable constraints for c.650 homes.

207 – Site 23 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 24 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

207 – Site 24 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydyar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 25 - Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

207 – Site 25 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydyar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed 5 structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 26 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

207 – Site 26 - Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydydar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 27 – Requirement, Advice

Flood Risk

The site has an area adjacent to the banks of the river Taff which falls within Zone C2. Most of the site is raised above predicted flood levels and flood risk is constrained to the immediate riverbank.

The proposal could include highly vulnerable development in C2 which should not be permitted.

Given the amount of land within Zone C2 we recommend amending the site boundary in the first instance. If not, further information/flood consequences assessment will be required to establish whether the risks and consequences of flooding can be found to be manageable in line with TAN15 criteria.

132 – Site 27 – Support

Proposed use Mixed Use. In Principle Recommendation.

An edge of town centre site. The car park is under used. Built development at this location was abandoned due to poor site conditions. Remains of the former Glamorgan Canal and other archaeological sensitive remains are present in this area. A development plan and site investigations should be carried out to determine the viability of a mixed use development here.

207 – Site 27 – Objection

Objection: the Heritage Trust would object to development on this site because of the heritage assets along the Glamorganshire Canal, conflict with the Taff Trail and loss of green open space close to the town centre.

280 – Site 27 – Objection

Cyfarthfa 27 Land South of College Car park 4.34ha

Proposed use Mixed Use. Not Recommended.

An edge of town centre site. Whilst the car park is under used, built development at this location was abandoned due to poor site conditions. The remains of the former Glamorgan Canal and other archaeological sensitive remains are present in this

area. A development plan and site investigations must be carried out to determine the viability of a mixed use development here.

103 – Site 28 – Advise

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

115 – Site 28 – Support

Key benefits of Site 28 – leisure/tourism:

- Provides an opportunity for low density tourism development. The majority of the Candidate Site area would remain undeveloped;
- Potential to attract and retain expenditure and investment in Merthyr Tydfil;
- Development would dovetail with national and local tourism strategies;
- Creation of significant number of long term jobs within easy reach of existing population;
- Good and sustainable vehicle access;
- Can create a major new leisure destination of national significance, focused around two new hotels, spa and conference facilities, heritage and nature trails, indoor bike and skate park (to complement the activities of neighbouring Bike Park Wales) and the UK's largest indoor water park.

132 - Site 28 - Objection

Proposed use Leisure/Tourism.

The majority of this area (181.3ha) is made up of the Cwmglo/Glyndyrys SSSI. Whilst Leisure/Tourism is considered to be an acceptable use, built development in support of this designation is prohibited in Open Countryside, outside of the settlement boundary.

The site is criss-crossed with numerous claimed Rights of Way which have been confirmed by the Council's Rights of Way Committees. It is anticipated that these claimed Rights of Way will be forwarded to the Welsh Government Planning Inspectorate in late October 2017 and their validity determined at Public Inquiry.

In addition to the ecological importance of the area, the site contains archaeological remains of National/International importance.

The cultural value of the site and its importance to the Cyfarthfa Heritage Area and its association with the Crawshays of Cyfarthfa is highly significant to the development of Merthyr Tydfil. As such the area should be designated as a Countryside/Heritage Park and also an ASA site.

207 – Site 28 – Objection

The Heritage Trust objects to any development in West Merthyr / Rhydygar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

280 – Site 28 - Objection

Cyfarthfa 28 West Merthyr 232.48ha

Proposed use: Leisure/Tourism.

The majority of this area (181.3ha) is made up of the Cwmglo/Glyndyrys SSSI. Whilst Leisure/Tourism is considered to be an acceptable use, built development in support of this designation is prohibited in Open Countryside. It sits outside of the settlement boundary. The site is criss-crossed with numerous claimed Rights of Way which have been confirmed by the Council's Rights of Way Committees. It is anticipated that these claimed Rights of Way will be forwarded to the Welsh Government Planning Inspectorate in late October 2017. In addition to the ecological importance of the area, the site contains archaeological remains of National/International importance. Because of this, previous planning applications for this site have been declined. The cultural value of the site and its importance to the Cyfarthfa Heritage Area and its association with the Cyfarthfa Mineral Lease is highly significant to the development of Merthyr Tydfil. Our view is that the area should be designated as a Countryside/Heritage Park and also as a candidate site for ASA status.

103 – Site 29 – Requirement, Advise

Flood Risk

The site falls partially within Zone C2. Most of the site is raised above predicted flood levels and flood risk is constrained to the immediate riverbank.

Proposal is for highly vulnerable development in C2 which should not be permitted.

Recommend amending site boundary or further information/flood consequences assessment is provided to establish the risks and consequences of flooding.

132 – Site 29 – Support

Proposed use Residential. Recommended. The designation accords with the current LDP for the area and represents the final built development of 29 units of accommodation for completion of the site.

207 – Site 29 – Objection

Objection: the Heritage Trust objects because development on this site would conflict with the Taff Trail and lead to the loss of open green space in an area already burdened with commercial development. There are parking problems

around the commercial and leisure facilities and these are exacerbated with a range of public and private parking enforcement regimes. Access would be problematic through the 'leisure village' and crossing the Taff Trail.

280 – Site 29 – Support

Cyfarthfa 29 Rhydyar Leisure Centre Site (0.43ha)

Proposed use: Residential. Recommended.

The designation accords with the current LDP for the area and represents the final built development of 29 units of accommodation for completion of the site.

103 – Site 30 - Information, Requirement, Requirement

Flood Risk

The site has large areas which fall within Zone C2. The flood risk is primarily from the River Taff and Nant Canaid and runs through the centre of the site.

The proposal is for mix-use and could include highly vulnerable development within Zone C2 which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. We also refer you to our comments on SFCA set out above.

The regeneration area includes Dragon Parc, Hoover factory and The Willows/Abercanaid Industrial Estate. We have recently requested FCAs (and detailed flood risk modelling) for some of these sites. There could be opportunity for this modelling to cover the entire Regeneration Area.

115 – Site 30 – Objection

Note on Candidate Site 30

Following through the process of SLA definition set out in the Background Paper, it is notable that much of Candidate Site 30 falls within the broad search area for SLA3, defined by the LANDMAP scoring method as above the threshold score of 10 (see Boundary Definition Plan 13: Merthyr West Flank proposed SLA). The Stage 3 Review (field verification and boundary definition) does not indicate the reasons for omitting the land to the east of the A470 from the candidate SLA, nor does the justification for the boundary definitions in Table 3 Evaluation of Proposed SLAs against Strategic Criteria. The Stage 4 Statement of Value and Significance accepts the areas defined in Stages 1 – 3 of the process.

The scoring system used was tailored so that a large proportion of the areas in the Borough outside of the settlements would qualify for SLA designation;

notwithstanding this, the large areas of Candidate Site 30 have been omitted from the Stage 3 Review (field verification and boundary definition) without any given justification.

207 – Site 30 – Objection & Comment

Objection: the Heritage Trust objects to any development (eg residential, industrial or parking) on Hoover Sports Ground.

Comment: the Heritage Trust is supportive of redevelopment of the Hoover sites provided that this is around a new Metro hub (train, bus, parking, cycling and pedestrian interchange) at the north end of the Hoover site near Brandy Bridge. The Heritage Trust also notes that redevelopment should include a 6 'second crossing' of the River Taff as part of the scheme (for access to the Metro hub) as the single road bridge crossing (Brandy Bridge) would be overburdened with substantial residential development at Abercanaid / the west bank of the riverbank.

207 – Site 31 – Comment

Comment: the Heritage Trust is concerned about development on this green, open space because of the loss of amenity and informal play space to the community. These concerns also apply to sites 35 and 36.

207 – Site 32 – Objection & Comment

Objection: the Heritage Trust objects to the loss of Dowlais Library car park – a small part of this site.

Comment: the Heritage Trust would be concerned about possible heritage and archaeological remains but more so that any development should integrate into the historic landscape of the library, St John's Church and nearby Dowlais Stables.

207 – Site 33 – Comment

Comment: the Heritage Trust noted that this was a substantial site that might still have the capacity to attract public sector facilities such as a prison or fire station.

207 – Site 34 – Comment

Comment: the Heritage Trust noted that this site includes old railway line and an associated building (Station House) and development should be sympathetic to the heritage assets.

207 – Site 35 - Comment

Comment: the Heritage Trust is concerned about development on this green, open space because of the loss of amenity and informal play space to the community. These concerns also apply to sites 31 and 36. In this case there would be the loss of a children's playground.

207 – Site 37 – Comment

Comment: the Heritage Trust would be concerned at any further development outside of this site because of the impact on heritage and archaeological assets and the extension of development into the countryside.

207 – Site 39 – Comment

Comment: the Heritage Trust would be concerned about possible heritage and archaeological remains but more so that any development should integrate into the historic landscape of the library, St John's Church and nearby Dowlais Stables.

207 – Site 40 – Comment

Comment: the Heritage Trust would like to see proposals for residential development on the large Ivor Works site go ahead with the surviving historic buildings renovated but is aware of potential site contamination. Green paths and open spaces should be retained as part of any development.

103 – Site 41 - Advice

Nature Conservation

This site contains species-rich grassland of national significance and as such is a candidate SSSI designation. Though not yet benefitting from the formal legal protection afforded by SSSI designation, the habitats present on the site are nonetheless of national conservation importance.

We advise this site is not considered further.

207 – Site 41 – Objection

Objection: the Heritage Trust objects to tourism proposals for this site (possibly camping and caravan pitches) because of the gross intrusion into the green countryside on the border of the Brecon Beacons and because of the impact on the landscape views. Access to the site also seems problematic and development might lead to interference with Brecon Mountain Railway's facilities.

207 – Site 42 – Comment

Comments: the Heritage Trust is aware that the A465 is to be re-routed through this area of green pasture. Any development would be outside the settlement area and overdevelopment.

207 – Site 43 – Comment

Comments: the Heritage Trust has concerns about the potential loss of green open space (currently used for grazing). Also part of the area appears to have been used as playing fields in the past – and there should be no development if the land might be used again by either the school or the community for sport.

103 – Site 44 – Information, Requirement

Flood Risk

The site falls within Zone C2. The flood risk is primarily from the River Taff.

The proposal is for highly vulnerable development within Zone C2 which should not be permitted.

We are aware of previous FCA being prepared for the road project which has recently been finished. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information will be required to establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. In the first instance the previous flood risk modelling work should be submitted to us as a flood map challenge to establish whether the flood outlines have changed.

207- Site 44 – Comment

Comments: the Heritage Trust is concerned that any heritage assets in this area or at the perimeter of the site – in particular those linked to the former colliery railway link – should be protected. There should be adequate mitigation against flood risks.

103 – Site 45 – Requirement

The proposal is for a cemetery. A risk assessment should be carried out which demonstrates that the location is suitable for this type of development/proposal. We should be consulted to provide further specific advice on the scope of this risk assessment. Please note that a risk assessment is normally tiered. Further advice on this can be found at <https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk-assessments>.

103 – Site 46 – Information, Requirement

Flood Risk

The site falls within Zone C2. The flood risk is primarily from the River Taff.

The proposal is for highly vulnerable development within Zone C2 which should not be permitted.

We are aware of previous FCA being prepared for the road project which has recently been finished. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information will be required to establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. In the first instance the previous flood risk modelling work should be submitted to us as a flood map challenge to establish whether the flood outlines have changed.

207 – Site 46 – Comment

Comments: the Heritage Trust is concerned that any heritage assets in this area or at the perimeter of the site – in particular those linked to the former colliery railway link – should be protected. There should be adequate mitigation against flood risks.

103 – Site 47 – Information, Advice

Flood Risk

The site falls within Zone C2. The flood risk is primarily from the River Taff.

The proposal is for highly vulnerable development within Zone C2 which should not be permitted.

We are aware of previous FCA being prepared for the road project which has recently been finished. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information will be required to establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. In the first instance the previous flood risk modelling work should be submitted to us as a flood map challenge to establish whether the flood outlines have changed.

207 – Site 47 – Comment

Comments: the Heritage Trust is concerned that any heritage assets in this area or at the perimeter of the site – in particular those linked to the former colliery railway link – should be protected. There should be adequate mitigation against flood risks.

207 – Site 49 – Comment

Comment: the Heritage Trust welcomes the addition of this important area of river bank and its heritage assets – including the line and probable archaeological remains of the Gurnos Tramroad and Pontycafnau Leat as well as the Cyfarthfa Limekilns (a listed structure). However, the previously well-used community route and claimed right of way from Cefn Coed Old Bridge to Pontycafnau has been blocked and access from the Brecon Road by motor vehicle, on foot or bicycle to Pontycafnau also needs intervention and improvement.

207 – Site 50 – Comment

Comment: the Heritage Trust welcomes the addition/inclusion of this important stretch of the River Taff and its banks at the Cyfarthfa Ironworks site. This should be followed by projects to restore the walled banks, the original bridge and improve public access to the east bank walk.

207 – Site 51 – Comment

Comment: the Heritage Trust welcomes the addition/inclusion of this important part of the Cyfarthfa Ironworks – which includes a traditional community route that should be reclaimed as a right of way from Williamstown Bridge through what was the site of some of the earliest ironworks buildings (from 1766-67) as well as the late 20th century access road. River bank improvements will be needed in the long term. There are probably archaeological remains in this area.

207 – Site 52 – Comment

Comment: the Heritage Trust supports the restoration of the main front hospital buildings (or at the very least the façade) and would oppose redevelopment if it entailed loss of the original façade and other main features.

207 – Site 53 – Comment

Comment: the Heritage Trust supports the restoration of the YMCA.

207 – Site 54 – Comment

Comment: the Heritage Trust supports the protection of the Pontycafnau area including Cyfarthfa Furnaces and two Scheduled Ancient Monuments (as designated candidate site 54) for heritage and outdoor activities projects that are part of proposals for the wider Cyfarthfa Heritage Area. However, the heritage area / Pontycafnau should be extended to include the Finger Tip, Tai Mawr Leat and land around the Taff Trail up to and including Cefn Coed Viaduct.

103 – Site 55 – Information, Requirement

Flood Risk

The site falls within Zone C2 and the proposal is for highly vulnerable development which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 - Site 55 – Objection

Objection: the Heritage Trust objects to any development of housing on the Chapel Row / Chapel Banks site. The chapel remains themselves are an important heritage site. So is Chapel Row, the head of the Glamorgan Canal and the Rhydycar canal

bridge. House building would severely impact on this heritage site and on access to the heritage assets and on the Joseph Parry Museum at 4 Chapel Row. This site should be protected for heritage and tourism. There are possible archaeological remains on site and it is used by anglers to fish the River Taff.

207 - Site 56 – Comment

Comment: the Heritage Trust would like to see the Taff Trail on the river bank adjoining Martin Evans House protected and safeguarded. The Taff Trail in this area needs improvement as it does not appear to meet the Active Travel (Wales) Design Guidance at several points close to this site and Chapel Row.

207 – Site 57 – Comment

Comment: the Heritage Trust supports the designation of site 57 as the Cyfarthfa Heritage Area and would like to see its north-eastern boundary extended to include the Taf Fawr west bank, the Finger Tip, Tai Mawr Leat and Cefn Coed Viaduct.

207 – Site 59 – Comment

Comment: the Heritage Trust does not have any heritage concerns but warns there may be overdevelopment on the site, access to the site is likely to be problematic and there is a need for community facilities.

103 – Site 60 – Recommendation

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

103 – Site 61 – Recommendation

Nature Conservation

Development within the site will involve direct damage to the features of Cwm Glo a Glyndyrys Site of Special Scientific Interest (SSSI). There is a presumption against development likely to damage a SSSI.

We advise this site is not considered further.

115 – Site 61 – Support

Key benefits of Site 61 – hotel/tourism:

- Deliverable site to provide much needed tourist accommodation;
- Located to take advantage of natural beauty, proximity to significant tourist draw (Bike Park Wales) and yet still accessible from surrounding residential

areas and Merthyr town e.g. via two footbridges over the A470 and one underpass under the road;

- Creation of significant number of long term jobs within easy reach of existing population;
- Minimises impact on sensitive ecology and allows for appropriate mitigation, as required;
- Easy access from A470 including dedicated spur off Rydycar roundabout;
- Can create a major new leisure destination of national significance, focused around two new hotels, spa and conference facilities, heritage and nature trails, indoor bike and skate park (to complement the activities of neighbouring Bike Park Wales) and the UK's largest indoor water park.

207 – Site 61 - Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

115 – Site 62 – Support

Key benefits of Site 62 – residential:

- Well located to existing settlement (Abercanaid/Merthyr Tydfil) and associated shops and services;
- Highly accessible by foot and cycle;
- Good and sustainable vehicle access;
- Avoids sensitive ecology;
- Small, deliverable, constraint-free site for c.15 homes;
- Located within the Hoover Strategic Regeneration Area.

207 – Site 62 – Objection

Objection: The Heritage Trust objects to any development in West Merthyr / Rhydycar West – the principle reasons include development outside the settlement area, negative impacts on access (including prospective rights of way), on the natural environment (SSSI area, TPOs), on heritage SAMs, listed structures, prospective listed structures, heritage features and assets and on the historic landscape.

103 – Site 63 – Requirement

Flood Risk

The site falls within Zone C1. We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be

required. This should establish whether the risks and consequences of flooding can **be acceptably managed in line with TAN15 criteria.**

207 – Site 63 - Comment

Comment: the Heritage Trust has concerns about the impact of development on the historic River Taff landscape and on the historic cottages neighbouring the site. There are also concerns about development on the flood plain and the dangers of flooding.

103 – Site 64 - Requirement

Flood Risk

The site falls within Zone C1. We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 64 – Comment

Comment: the Heritage Trust has concerns about the impact of development on the historic River Taff landscape and on the historic cottages neighbouring the site. There are also concerns about development on the flood plain and the dangers of flooding.

103 – Site 65 – Requirement

Flood Risk

The site falls within Zone C1. We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 65 - Comment

Comment: the Heritage Trust has concerns about the impact of development on the historic River Taff landscape and on the historic cottages neighbouring the site. There are also concerns about development on the flood plain and the dangers of flooding.

103 – Site 66 - Requirement

Flood Risk

The site falls within Zone C1. We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 66 - Comment

Comment: the Heritage Trust has concerns about the impact of development on the historic River Taff landscape and on the historic cottages neighbouring the site. There are also concerns about development on the flood plain and the dangers of flooding.

103 – Site 67 – Information, Requirement, Requirement

Flood Risk

The site has large areas which fall within Zone C2. The flood risk is primarily from the River Taff and Nant Canaid and runs through the centre of the site.

The proposal is for mix-use and could include highly vulnerable development within Zone C2 which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. We also refer you to our comments on SFCA set out above.

The regeneration area includes Dragon Parc, Hoover factory and The Willows/Abercanaid Industrial Estate. We have recently requested FCAs (and detailed flood risk modelling) for some of these sites. There could be opportunity for this modelling to cover the entire Regeneration Area.

207 – Site 67 - Comment

Comment: the Heritage Trust is supportive of redevelopment of the Hoover sites provided that this is around a new Metro hub (train, bus, parking, cycling and pedestrian interchange) at the north end of the Hoover site near Brandy Bridge. The Heritage Trust also notes that redevelopment should include a 'second crossing' of the River Taff as the single road bridge crossing (Brandy Bridge) would be overburdened with substantial residential development at Abercanaid / the west bank of the riverbank. The Hoover Sports Ground should be protected for sports / community green open space.

258 – Site 68 – Support

The inclusion of Candidate Site Number 68 (Land West of Gethin Road, Abercanaid) for residential development as part of the Hoover Strategic Regeneration Area is fully supported and represents a sustainable and deliverable option in assisting with the future growth of the County Borough.

68 Land west of Gethin road, Abercanaid

Objection: the Heritage Trust has concerns about the legacy of mine shafts and shallow workings that may render the area unsuitable for housing development. In addition, the Heritage Trust is concerned that there may be an adverse impact on the Taff Trail which follows the Glamorganshire Canal. The negative effect would be in visual terms where the canal banks borders the main site but in physical terms at the north-eastern location where site access would cross the trail route.

103 – Site 69 – Information, Requirement, Requirement

Flood Risk

The site has large areas which fall within Zone C2. The flood risk is primarily from the River Taff and Nant Canaid and runs through the centre of the site.

The proposal is for mix-use and could include highly vulnerable development within Zone C2 which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. We also refer you to our comments on SFCA set out above.

The regeneration area includes Dragon Parc, Hoover factory and The Willows/Abercanaid Industrial Estate. We have recently requested FCAs (and detailed flood risk modelling) for some of these sites. There could be opportunity for this modelling to cover the entire Regeneration Area.

207 – Site 69 – Objection

Objection: the Heritage Trust has concerns about a mine shafts and shallow workings that may render this area (also included as part of site 61) as unsuitable for housing development. In addition, the Heritage Trust is concerned that there may be an adverse impact on the Taff Trail which follows the Glamorganshire Canal.

207 – Site 70 – Objection

Comment: the Heritage Trust is supportive of redevelopment of the Hoover sites provided that this is around a new Metro hub (train, bus, parking, cycling and pedestrian interchange) at the north end of the Hoover site near Brandy Bridge. The Heritage Trust also notes that redevelopment should include a 'second crossing' of

the River Taff as the single road bridge crossing (Brandy Bridge) would be overburdened with substantial residential development at Abercanaid / the west bank of the riverbank. The Heritage Trust objects to development on the Hoover Sports Ground which must be protected for sports / community green open space.

207 – Site 71 – Comment

Comment: the Heritage Trust is supportive of redevelopment of the Hoover sites provided that this is around a new Metro hub (train, bus, parking, cycling and pedestrian interchange) at the north end of the Hoover site near Brandy Bridge. The Heritage Trust also notes that redevelopment should include a 'second crossing' of the River Taff as the single road bridge crossing (Brandy Bridge) would be overburdened with substantial residential development at Abercanaid / the west bank of the riverbank. The Heritage Trust objects to development on the Hoover Sports Ground which must be protected for sports / community green open space.

103 – Site 72 – Information, Requirement, Requirement

Flood Risk

The site has large areas which fall within Zone C2. The flood risk is primarily from the River Taff and Nant Canaid and runs through the centre of the site.

The proposal is for mix-use and could include highly vulnerable development within Zone C2 which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. We also refer you to our comments on SFCA set out above.

The regeneration area includes Dragon Parc, Hoover factory and The Willows/Abercanaid Industrial Estate. We have recently requested FCAs (and detailed flood risk modelling) for some of these sites. There could be opportunity for this modelling to cover the entire Regeneration Area.

207 – Site 72 – Comment

Comment: the Heritage Trust is supportive of redevelopment of the Hoover sites provided that this is around a new Metro hub (train, bus, parking, cycling and pedestrian interchange) at the north end of the Hoover site near Brandy Bridge. The Heritage Trust also notes that redevelopment should include a 'second crossing' of the River Taff as the single road bridge crossing (Brandy Bridge) would be overburdened with substantial residential development at Abercanaid / the west bank of the riverbank. The Heritage Trust objects to development on the Hoover Sports Ground which must be protected for sports / community green open space.

207 – Site 73 – Objection

Objection: the Heritage Trust opposes this proposal (note comments for other Hoover sites and for the Hoover Regeneration Area) as redevelopment would lead to the loss of Merthyr Tydfil's premier sports and cricket ground as well as ancillary facilities including a sports pavilion, bowls green, (disused) tennis courts and a football pitch as well as open green space. There would also be the loss of the offices/canteen building, gatehouse and factory access. Any development on this small part of the Hoover site would impact severely on views of the original Hoover factory building (and make a conversion scheme less viable). The sports ground – together with the offices/canteen and gatehouse – were all part of Hoover's pioneering vision for their first manufacturing operation outside the United States and both in landscape and building design a good example – and sadly one of few remaining – of post-war reconstruction design.

207 – Site 74 – Comment

Comment: the Heritage Trust fully supports the proposal to maintain the Hoover sports ground as green open space and as a sports/cricket ground for community use and to retain the main 1948 original factory façade (south-eastern corner), the gatehouse and canteen/office building (also 1948). Any development on this small part of the Hoover site would impact severely on views of the original Hoover factory building (and make a conversion scheme less viable). The sports ground – together with the offices/canteen and gatehouse – were all part of Hoover's pioneering vision for their first manufacturing operation outside the United States and both in landscape and building design a good example – and sadly one of few remaining – of post-war reconstruction design. Prior to that there was community use (in the form of allotments) for at least part of the site and it was always understood by the workforce that Hoover had made a commitment to creating and maintaining the sports ground for the benefit of its employees.

103 – Site 75 – Information, Requirement, Requirement

Flood Risk

The site has large areas which fall within Zone C2. The flood risk is primarily from the River Taff and Nant Canaid and runs through the centre of the site.

The proposal is for mix-use and could include highly vulnerable development within Zone C2 which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria. We also refer you to our comments on SFCA set out above.

The regeneration area includes Dragon Parc, Hoover factory and The Willows/Abercanaid Industrial Estate. We have recently requested FCAs (and detailed flood risk modelling) for some of these sites. There could be opportunity for this modelling to cover the entire Regeneration Area.

207 – Site 75 – Comment & Objection

Comment: the Heritage Trust is supportive of redevelopment of the Hoover sites provided that this is around a new Metro hub (train, bus, parking, cycling and pedestrian interchange) at the north end of the Hoover site near Brandy Bridge. The Heritage Trust also notes that redevelopment should include a 'second crossing' of the River Taff as the single road bridge crossing (Brandy 14 Bridge) would be overburdened with substantial residential development at Abercanaid / the west bank of the riverbank.

Objection: the Heritage Trust opposes the redevelopment of the Hoover Sports Ground, original Hoover factory façade, Hoover canteen/offices and gatehouse. This redevelopment would lead to the loss of Merthyr Tydfil's premier sports and cricket ground as well as ancillary facilities including a sports pavilion, bowls green, (disused) tennis courts and a football pitch as well as open green space. There would also be the loss of the offices/canteen building, gatehouse and factory access. Any development on this small part of the Hoover site would impact severely on views of the original Hoover factory building (and make a conversion scheme less viable). The sports ground – together with the offices/canteen and gatehouse – were all part of Hoover's pioneering vision for their first manufacturing operation outside the United States and both in landscape and building design a good example – and sadly one of few remaining – of post-war reconstruction design.

103 – Site 76 – Recommendation

Flood Risk

The site has a very small area within Zone C2. The site appears to be raised above the flood levels and the risk is constrained to the immediate riverbank.

The proposal is for less vulnerable development in C2. Given the amount of land within Zone C2 we recommend amending the site boundary in the first instance.

76 Land south of Merthyr Tydfil Industrial Park/Sekisui – vacant to employment

Comment: the Heritage Trust is concerned that redevelopment of this site (a playing field and park extension) for industrial use could have a serious impact on the adjoining residential and municipal park areas. Access would need to be from the existing industrial park ie through the Sekisui site. A boundary area should be reserved with landscaping and a pedestrian/cycling route.

103 – Site 77 – Information, Requirement, Requirement

Flood Risk

The site falls within Zone C2 and the proposal is for highly vulnerable development which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 77 – Comment

Comment: although this site is described as vacant, it has been used as a school transport drop-off and pick-up point for Afon Taf High School over many years. The Heritage Trust is concerned that any present or future school use is not compromised.

207 – Site 78 - Comment

Objection: the Heritage Trust objects to development on an area which still has heritage assets and, far from being 'vacant land', has seen a 'return to nature' since the demise of the ski venture.

207 – Site 80 - Comment

Comment: the Heritage Trust is concerned that the setting of the neighbouring Gorsedd stones – which includes wall and steps – should be protected and also that there is appropriate and safe access onto Queens Road.

103 – Site 81 – Information, Requirement, Requirement

Flood Risk

These buildings are entirely within Zone C2. The risk is from the Nant Morlais. The proposal is for highly vulnerable development which should not be permitted.

We are not aware of detailed flood risk information for this area. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then further information in the form of detailed 1D/2D flood risk modelling and a FCA will be required. This should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 81 - Comment

Comment: the Heritage Trust is concerned that the theatre's façade should be preserved and incorporated into any new residential project.

207 – Site 82 - Comment

Comment: the Heritage Trust is concerned that the setting of the neighbouring Gorsedd stones – which includes wall and steps – should be protected and also that there is appropriate and safe access onto Queens Road.

207 – Site 83 - Comment

Comment: the Heritage Trust would object to any development that did not incorporate the restoration and renovation of the existing structure – the former Miners Hall.

207 – Site 84 - Comment

Comment: the Heritage Trust is concerned that the setting of the neighbouring Gorsedd stones – which includes wall and steps – should be protected and also that there is appropriate and safe access onto Queens Road.

103 – Site 85 – Information, Requirement

Flood Risk

The site falls within Zone C2. The risk is from the Nant Morlais. The proposal is for mixed-use development. If highly vulnerable development is proposed, then this should not be permitted in C2.

We are not aware of detailed flood risk information for this area. This was prepared by Captia (May 2016) to inform the new Merthyr Bus Station application. If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then a FCA will be required using the latest flood risk modelling (note that this model requires a re-run of Hydrological flows). The FCA should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 86 - Objection

Objection: the Heritage Trust would object to residential development at this site which is currently a green open space crossed by footpaths/cycle routes following its reclamation under the East Merthyr Phase 1 scheme – and, effectively, an extension to Newlands Park (itself a reclaimed site that has been nominated as a nature reserve). Development would be detrimental to the landscape and to the recovering wildlife. Access would be problematic unless through Bradley Gardens. The site was not reclaimed as a housing site – so that additional groundworks and foundations would be needed.

207 – Site 87 - Objection

Objection: the Heritage Trust objects to development on this site which is a green open park area with children's play facilities. The local road network is already

difficult to negotiate making vehicle, cycle and pedestrian passage awkward and potentially unsafe.

207 – Site 88 - Objection

Objection: the Heritage Trust is concerned that housing on this site will amount to overdevelopment, the loss of green open space and the loss of informal play area for the residents of the adjoining Gellideg Estate and new housing at Oak Tree Rise off Penheolferthyr. There would also be the loss of a green corridor from Twynyrodyn to the larger green open space that extends southwards and downhill to Pentrebach (and includes 'The Oval' and alternative Trevithick Trail routes).

207 – Site 89 - Comment

Comment: the Heritage Trust supports the proposal to restore, renovate, rebuild and convert to residential use the Miners Hall.

207 – Site 90 - Objection

Objection: the Heritage Trust objects to any proposal to redevelop St Tydfil's Park (a traditional park area included in site 90). The Heritage Trust notes that this is a former cholera cemetery and has long been a public park (and not just a hospital garden). The Heritage Trust also objects to any redevelopment of the remaining workhouse buildings – including the chapel and the gateway arch. The listed structures and associated buildings that have survived the wholesale demolition work should be renovated as part of a residential scheme with new build only on the footprint of the remainder of the former hospital and its infirmary.

103 – Site 91 – Requirement, Information

Flood Risk

The site falls within Zone C2. The risk is from the Nant Morlais. The proposal is for less vulnerable development. Notwithstanding the extant planning permission, your Authority is required to justify this type of development in this location (refer to our policy advice under Development and Flood Risk above). We are aware that a site specific FCA, prepared by Captia (May 2016) has been submitted to your Authority.

103 – Site 91 – Advice

Site Number 91 – Former Hollies/Police Station has been confirmed as Allocation T1 for the site of the new central bus station. You will be aware that we have provided advice on this proposal through planning permission P/16/0048. Although site 91 benefits from planning permission the site remains partially within DAM C2 (as defined by the Development Advice Maps referred to in TAN15). We advise you that the location of this allocation within the Plan will need to be justified in accordance with section 6 of TAN15.

The FCA that was submitted as part of the permission could be used as evidence to support the site if it were to be included as an allocation in the Plan.

103 – Site 92 – Requirement, Information

Flood Risk

The site falls within Zone C2. The risk is from the Nant Morlais. The proposal is for less vulnerable development.

We are aware of a detailed flood risk modelling for this area. This was prepared by Captia (May 2016) to inform the new Merthyr Bus Station application.

If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then a FCA will be required using the latest flood risk modelling (note that this model requires a re-run of Hydrological flows). The FCA should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 92 - Comment

Comment: the Heritage Trust supports the retention of this 1960s offices building including the tax office entrance way. Any change of use should respect this so that conversion and renovation does not lead to commercial visual intrusion into the townscape of Castle Street.

103 – Site 93 – Requirement, Information

Flood Risk

The site falls within Zone C2. The risk is from the Nant Morlais. The proposal is for less vulnerable development.

We are aware of a detailed flood risk modelling for this area. This was prepared by Captia (May 2016) to inform the new Merthyr Bus Station application.

If your Authority can justify this type of development in this location (refer to our policy advice under Development and Flood Risk above) then a FCA will be required using the latest flood risk modelling (note that this model requires a re-run of Hydrological flows). The FCA should establish whether the risks and consequences of flooding can be acceptably managed in line with TAN15 criteria.

207 – Site 93 - Comment

Comment: the Heritage Trust supports the retention of this 1960s offices building. Any change of use should respect this so that conversion and renovation does not lead to further commercial visual intrusion (noting long-standing shop and salon use) into the townscape of Castle Street and Penderyn Square.

103 – Site 94 – Recommendation

Flood Risk

The site has a very small area on the western boundary within Zone C2. The site is mostly raised above the flood levels and risk is constrained to low-lying ground adjacent to the Bargoed Taff.

The proposal includes highly vulnerable development in C2 which should not be permitted.

Given the amount of land within Zone C2 we recommend amending the site boundary in the first instance. If not, further information/flood consequences assessment will be required to establish whether the risks and consequences of flooding can be found to be manageable in line with TAN15 criteria.

207 – Site 94 – Objection

Objection: the Heritage Trust notes that this site adjoins Mill Street which is on the Treharris and Quakers Yard heritage trail but lacks a pedestrian footway and is potentially hazardous to motor vehicle, cycle and pedestrian traffic. There are footpaths and rights of way across the site which need protection.

Any development of this site should be linked to road and footway improvements to Mill Street – likely to be a considerable engineering operation. There are probably other historic and archaeological features on the site. Any development should not be a visual intrusion into the historic landscape of Quakers Yard.

207 – Site 96 – Comment

Comment: the Heritage Trust notes that there are footpaths and rights of way across this site and these need to be incorporated into any residential development or diverted and laid out so that they are accessible for pedestrians and non-motorised users.

207 – Site 98 – Comment

Comment: the Heritage Trust notes that this site is along part of the east bank of the River Taf Fawr and should be correctly named Taf Fawr River Bank. The Heritage Trust is of the view that this site should be protected for its heritage and natural environment as should be continuation of the river bank southwards (past Teddingtons football field) to the confluence of the Rivers Taf Fawr and Taf Fechan and up the western river bank of the Taf Fechan to Cefn Coed Bridge.

132 – Site 99 – Support

Proposed Use: Residential. Recommended

Whilst there are a limited number of negative criteria which point to rejection of the site for a proposed residential development, on balance these are outweighed by positive criteria in support of the proposed use.

Care will need to be taken with drainage as the covers do “pop” lower down the Swansea Road near Trago Mills in heavy rain.

129 – Site 100 – Objection

It is noted that an additional Candidate Site has been submitted in the Bedlinog ward – Site Number 100 Land adjacent to 24 Gelligaer Road. This site is located directly west of Site Number 6 and is therefore also in close proximity to the listed buildings at Llancaich Fawr. Caerphilly CBC object to the principle of housing on this site.

The SA in respect of Objective 16 on cultural heritage assets scores the site as having a ‘neutral’ impact. In light of the proximity to the listed buildings and potential impact on their rural setting, we consider that it would be more appropriate to score the site as ‘Uncertain’ or ‘Negative’ as it has not been demonstrated that any harm to the setting of Llancaich Fawr can be mitigated.

132 - Site 101 – Objection

Proposed use: Residential. Not Recommended

This is a greenfield site, outside of the settlement boundary, in open countryside.

Development would negatively impact on the Open Spaces Strategy in a Ward where there is an identified deficiency of open space/informal amenity.

A lack of key services and facilities within reasonable walking distance is a negative consideration.

There is evidence of previous coal mining activity which could make this site both difficult and costly to develop.

It may also be in the habitat range of Great Crested Newt which is known to be on adjacent land.

132 - Site 102 - Objection

Proposed Use: Residential Not Recommended

There is limited access to the site along substandard road which would require the demolition of existing properties to improve.

See comments above on deterioration in public transport provision.

Heolgerrig suffers from overdevelopment and is dependent on an increased use of private transport.

It is a greenfield site, subject to former coal mining activity which has naturally regenerated and is outside the existing settlement boundary, in open countryside.